2.18 Utilities and Service Systems

This section provides an overview of stormwater drainage, wastewater, municipal water, natural gas, electricity capacity, telecommunications, and solid waste services in the unincorporated areas of San Diego County and a discussion of how adoption and implementation of the proposed Cannabis Program would affect capacity and ability to provide these services. The analysis is based on a review of existing documents and studies that address water resources in the vicinity of the project. The reader is referred to Section 2.11, "Hydrology and Water Quality," for the analysis of groundwater use.

Comments received in response to the notice of preparation (NOP) pertained to adequate water supply and infrastructure impacts. These issues are discussed below. 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 2.18.1.

Table 2.18.1 Utilities and Service Systems Summary of Impacts

Issue Number	Issue Topic	Project Direct Impact	Project Cumulative Impact	Impact after Mitigation
1	Adequate Water Supplies	Alternative 1: Less than Significant Alternatives 2–5: Significant	Alternative 1: Less than Significant Alternatives 2–5: Significant	Alternative 1: Less than Significant Alternatives 2–5: Significant and Unavoidable
2	Adequate Wastewater Treatment Facilities	Alternatives 1–5: Less than Significant	Alternatives 1–5: Less than Significant	Alternatives 1–5: Less than Significant
3	Sufficient Landfill Capacity and Solid Waste Regulations	Alternatives 1–5: Less than Significant	Alternatives 1–5: Less than Significant	Alternatives 1–5: Less than Significant

2.18.1 Existing Conditions

Public utilities in the program area are provided by various entities, as discussed in detail below.

2.18.1.1 *Water Supply*

Water Supply Provision

There are several independent districts and agencies that share the responsibility for the planning and management of the potable water delivery system in San Diego County. Potable water resources in the county are primarily provided by the Metropolitan Water District (MWD), San Diego County Water Authority (SDCWA), and SDCWA Member Water Districts; groundwater dependent water districts; and groundwater dependent users. Section 2.11, "Hydrology and Water Quality," contains a detailed description of surface water and groundwater resources in the county.

MWD provides approximately 14 percent of the total water supply for the entire San Diego County, including the incorporated cities. SDCWA is one of MWD's 23 member agencies and is the largest MWD member agency in terms of deliveries. SDCWA provides water supplies to 3.3 million people within 23 member agencies that deliver water across the metropolitan San Diego region. The SDCWA member agencies include 6 cities, 5 water districts, 3 irrigation districts, 7 municipal water districts, and 1 federal agency (Camp Pendleton Marine Corps Base) (SDCWA n.d.).

The *2013 Regional Water Facilities Optimization and Master Plan Update* (2013 Master Plan) provides a comprehensive evaluation of future infrastructure needs based on projections of water supplies and demands (SDCWA 2014). The 2013 Master Plan also considers system improvements necessary for the safe and reliable operation of the aqueduct system and identifies risk areas where the future improvements may be needed to assure continuous operation following natural or human-made events that interrupt water deliveries to the member agencies. Lastly, the 2013 Master Plan evaluates opportunities for development of renewable energy resources that could provide a new revenue source and mitigate greenhouse emissions. Results from the evaluations showed that while the SDCWA's system of conveyance, treatment, and storage facilities is robust, new infrastructure improvements are needed to alleviate potential conveyance constraints and supply shortages resulting from projected demand increases as the region's population grows throughout the 20-year planning horizon of the 2013 Master Plan.

SDCWA also has a Water Shortage Contingency Plan (May 2021), which provides its member agencies with a series of progressive steps to take when faced with a shortage of imported water supplies. Such actions help avoid or minimize impacts of shortages and ensure an equitable allocation of supplies throughout the San Diego region.

Several water districts serve the unincorporated area of the county, which import the majority of their water from SDCWA through its supplier, MWD. The location and boundaries of the SDCWA member districts that would serve the proposed Cannabis Program are shown on Figure 2.18.1. SDCWA Member Water Districts that serve the unincorporated county include the following:

- Helix Water District,
- Lakeside Water District,
- Olivenhain Municipal Water District,
- Otay Water District,
- Padre Dam Municipal Water District,
- Ramona Municipal Water District,
- Rincon Del Diablo Municipal Water District,
- Santa Fe Irrigation District,
- Sweetwater Authority,
- Vallecitos Water District,
- Valley Center Municipal Water District,
- Vista Irrigation District, and
- Yuima Municipal Water District.

The California Urban Water Management Planning Act (UWMPA) requires that each urban water supplier providing water for municipal purposes either directly or indirectly to more than 3,000 customers or supplying more than 3,000 acre-feet of water annually, shall prepare, update and adopt an Urban Water Management Plan (UWMP) at least once every 5 years on or before December 31 in years ending in 5 and 0. This applies to MWD, SDCWA, and its member agencies that serve the unincorporated area of the county. The intent of a UWMP is to present important information on water supply, water usage, recycled water, and water use efficiency programs in a respective water district's service area. A UWMP also serves as a valuable resource for planners and policy makers over a 25-year timeframe. The UWMP process ensures that water supplies are being planned to meet future growth.

UWMPs are developed to manage the uncertainties and variability of multiple supply sources and demands over the long term through preferred water resources strategy adoption and resource development target approvals for implementation. Water districts update their demand forecasts and supply needs based on the most recent SANDAG forecast approximately every 5 years to coincide with preparation of their UWMPs. The most current supply and demand projections for water districts are contained in their respective 2020 UWMPs. SDCWA member districts rely heavily on the UWMPs, Integrated Resources Plans of MWD, and the Regional Water Facilities Master Plan of SDCWA for documentation of supplies available to meet projected demands.

The UWMPs describe the reliability of the water supply and vulnerability to seasonal or climatic shortages, to the extent practical. Normal water years are considered to be years that experience average rainfall for the respective district. Single dry water years are considered 1-year events of less than average rainfall, surrounded by average rainfall years. Multiple dry water years refer to a series of below average rainfall for particular areas. Projections for multiple dry years are made in 5-year increments. In the 2020 UWMPs, MWD, SDCWA, and all SDCWA member agencies that serve the unincorporated county determined that adequate water supplies would be available to serve existing service areas under normal water year, single dry water year, and multiple dry water year conditions through the year 2045 (Helix Water District 2021; Lakeside Water District 2021; Metropolitan Water District of Southern California 2021; Olivenhain Municipal Water District 2021; Otay Water District 2021; Padre Dam Municipal Water District 2021;Ramona Municipal Water District 2021; Rincon del Diablo Municipal Water District 2021; SDCWA 2021; Santa Fe Irrigation District 2021; Sweetwater Authority 2021; Vallecitos Water District 2021; Valley Center Municipal Water District 2021; Vista Irrigation District 2021). Future demand would be met (and in some cases water supply would exceed demand in some districts, as noted below) by the supply in each 5-year increment through 2045, including in normal, single dry year, and multiple dry years as identified below:

- MWD (supply would exceed demand),
- SDCWA (supply would exceed demand),
- Helix Water District (supply would exceed demand),
- Lakeside Water District (supply would exceed demand),
- Olivenhain Municipal Water District,
- Otay Water District,
- Padre Dam Municipal Water District,

- Ramona Municipal Water District,
- Rincon Del Diablo Municipal Water District,
- Santa Fe Irrigation District,
- Sweetwater Authority,
- Vallecitos Water District,
- Valley Center Municipal Water District,
- Vista Irrigation District, and
- Yuima Municipal Water District.

The water demand and supply projections identified in each UWMP account for the additional demand from updated population projections and housing allocations identified in SANDAG's 2050 Regional Growth Forecast. These water supply and demand projections are reevaluated for the reasonably foreseeable future (i.e., 20-year planning period) as part of the UWMP update process, which occurs every 5 years as required by the UWMPA.

Surface Water Supply

The regional surface water yield is supported by 24 surface reservoirs with a combined capacity of 722,793 acre-feet. SDCWA seasonal, drought, and emergency storage capacity currently includes 24,774 acre-feet of in-region surface water storage at the Olivenhain Reservoir, 157,100 acre-feet at the San Vicente Dam, and 70,000 acre-feet of out-of-region leased groundwater storage in the San Joaquin Valley. Surface water supplies can represent the largest single local resource in SDCWA's service area. However, annual surface water yields can vary substantially due to fluctuating hydrologic cycles. Since 1990, annual surface water yields have ranged from a low of 4,100 acre-feet in fiscal year 2015 to a high of 140,300 acre-feet in fiscal year 1984. SDCWA member agencies' projected average annual surface water use is anticipated to increase slightly, from 44,237 acre-feet in 2020 to 44,659 acre-feet in 2045 (SDCWA 2021).

Groundwater Dependent Water Districts

The coastal zone of San Diego County is mostly supplied with imported water from member agencies of SDCWA. The remaining portion of the county (approximately 65 percent in area) is completely dependent on groundwater resources. Groundwater-dependent properties within San Diego County, if not served by a water district such as those listed above, are either served by on-site private wells or by groundwater provided by a small or community water system, such as a small water company.

The groundwater-dependent water districts listed below serve the unincorporated areas of San Diego County without the ability to receive imported water directly from SDCWA. Each of these districts relies on groundwater as the only source of their water supply. The reader is referred to Section 2.11, "Hydrology and Water Quality," for information regarding groundwater resources in the county.

- Borrego Water District,
- Campo Water Maintenance District,

- Canebrake County Water District,
- Cuyamaca Water District,
- Descanso Community Services District,
- Jacumba Community Services District,
- Julian Community Services District,
- Majestic Pines Community Services District,
- Questhaven Municipal Water District,
- San Luis Rey Municipal Water District, and
- Wynola Water District.

Small and State Water Systems

Small and community water systems are regulated by the County of San Diego Department of Environmental Health and Quality (DEHQ) Land Use Program. In July 2022, San Diego County's community water systems, non-transient non-community water systems, and transient noncommunity water systems returned to the State Water Resources Control Board (SWRCB) Division of Drinking Water for oversight and regulation (County of San Diego n.d.-b).

2.18.1.2 *Wastewater and Stormwater*

The Metro Wastewater Joint Powers Authority (JPA) is a state-authorized JPA representing 12 agencies and approximately 800,000 people in the San Diego region. The Metro JPA is a coalition of the municipalities and special districts that share the use of the City of San Diego's wastewater facilities. Its member agencies include the cities of Chula Vista, Coronado, Del Mar, El Cajon, Imperial Beach, La Mesa, National City, and Poway; the Lemon Grove Sanitation District; the Padre Dam Municipal and Otay Water Districts; and the County of San Diego Sanitation District. These agencies collectively pay for approximately 35 percent of the system's upkeep and capital costs. Usage rates are based on the percentage of wastewater flow they generate (Metro Wastewater JPA n.d.).

The Metropolitan Wastewater System (Metro), which is owned and operated by the City of San Diego's Public Utilities Department (PUD), provides regional wastewater treatment and disposal services for the San Diego region. Metro serves 16 cities and wastewater districts with a service area of approximately 450 square miles and service population of approximately 2.2 million (Metro Wastewater JPA n.d.).

Wastewater districts are generally responsible for providing collection, transmission, and disposal of sewage. On May 2, 2006, SWRCB adopted Order Number 2006-0003-DWQ, the Waste Discharge Requirements (WDRs), which requires all federal and state agencies, municipalities, counties, districts, and other public entities that own or operate a wastewater collection system greater than 1 mile in length to develop and implement a system-specific Sewer System Management Plan (SSMP). An SSMP must document how an agency manages its wastewater collection system. The most recent SSMP was prepared by the San Diego County Sanitation District (District) in August 2020 to comply with the WDRs.

San Diego County Sewer Service Areas managed by the District include Alpine, Campo, Lakeside, East Otay Mesa, Spring Valley, Winter Gardens, and Julian Pine Valley, which are described below (County of San Diego 2020; San Diego County LAFCO 2019). All wastewater infrastructure, including pipeline sizes, are designed toward aligning with capacity at the Point Loma Wastewater Treatment Plant (WWTP).

- Alpine Sanitation District/Lakeside Sanitation District. The Alpine Sanitation District provides wastewater service to portions of the Alpine Community Plan Area. The Alpine Sanitation District serves an area of approximately 1.4 square miles and owns 21 miles of pipelines and 2 lift stations. The largest sewer main in the collection system is 12 inches in diameter. Wastewater collected within Alpine flows directly into Lakeside with the aid of 2 public pump stations (Galloway and Harbison Canyon).
- The Lakeside Sanitation District maintains the public sewer system for the unincorporated community of Lakeside, which is conveyed to the City of San Diego's JPA system for treatment. The Lakeside Sanitation District service area is approximately 7.9 square miles. The District operates 103 miles of pipelines and 2 lift stations. The majority of the collection system consists of 8-inch diameter pipe. The largest collection trunk is 42 inches in diameter.
- The Alpine-Lakeside service area's maximum daily wastewater capacity to convey collected sewage to the Point Loma WWTP for subsequent treatment and disposal is 4.841 million gallons. This amount is specific to the District share allocated to Alpine-Lakeside and equals 27.7 percent of the total daily capacity contracted to the District as a signatory of Metro. The District is currently operating with sufficient and excess capacity within the Alpine-Lakeside service area.
- Campo Water and Sewer Maintenance District. The Campo Water and Sewer Maintenance District is located in the southeastern portion of San Diego County and provides sewer service to local residents. The Campo service area currently consists of approximately 6.5 miles of sewer pipelines that range between 4 and 12 inches in diameter. A gravity conveyance line transports sewage to the adjacent Rancho Del Campo Facility for secondary treatment and discharge into percolation ponds. The Campo service area's maximum daily wastewater treatment and discharge capacity at the Rancho Del Campo Facility is 0.113 million gallons.
- East Otay Mesa Sewer Maintenance District. The East Otay Mesa Sewer Maintenance District serves the unincorporated East Otay Mesa area. The East Otay Mesa Sewer Maintenance District operates 4 miles of pipeline and 1 sewer outfall. The East Otay Mesa service area's maximum daily wastewater capacity to convey collected sewage to the Point Loma WWTP for subsequent treatment and disposal is 1,000 million gallons. This amount is specific to the District share allocated to East Otay Mesa and equals 5.7 percent of the total daily capacity contracted to the District as a signatory of Metro. The District is currently operating with sufficient and excess capacity within its East Otay Mesa service area.
- Spring Valley Sanitation District. Spring Valley Sanitation District serves the unincorporated communities of Spring Valley, Casa de Oro, and Sweetwater. The Spring Valley Sanitation District's service area is approximately 20 square miles in area. The majority of the collection system consists of 8-inch diameter pipe. The largest collection trunk is 54 inches in diameter. In addition to the Spring Valley Outfall, the District also operates and maintains 271 miles of sewer collection and transmission

facilities and 4 lift stations. The Spring Valley Sanitation District service area's maximum daily wastewater capacity to convey collected sewage to the Point Loma WWTP for subsequent treatment and disposal is 10.353 million gallons. This amount is specific to the District share allocated to Spring Valley and equals 59.1 percent of the total daily capacity contracted to the District as a signatory member of Metro. The District is currently operating with sufficient and excess capacity within the Spring Valley service area.

- Winter Gardens Sewer Maintenance District. The Winter Gardens Sewer Maintenance District serves the unincorporated Winter Gardens area. The Winter Gardens Sewer Maintenance District operates 23 miles of pipelines that range in diameter between 6 and 15 inches and 1 flow meter station. The Winter Gardens Sewer Maintenance District is close to build-out with little area remaining for future growth. Sewage flows are collected and conveyed to the City of San Diego's JPA system for treatment. The Winter Gardens service area's maximum daily wastewater capacity to convey collected sewage to the Point Loma WWTP for subsequent treatment and disposal is 1,200 million gallons. This amount is specific to the District share allocated to Winter Gardens and equals 6.9 percent of the total daily capacity contracted to the District as a signatory of Metro. An additional capacity consideration also applies to Winter Gardens and involves a separate agreement with the City of El Cajon to allow the District to wheel its wastewater through the city to a connecting JPA trunk line leading to Point Loma WWTP. This wheeling agreement prescribes the maximum average day flow from Winter Gardens into El Cajon at 1,000 million gallons. The District is currently operating with available capacity within the Winter Gardens service area.
- Julian Sanitation District. The Julian Sanitation District serves the unincorporated community of Julian. The Julian Sanitation District's service area is approximately 0.189 square miles, or 119 acres. The Julian Sanitation District sewer collection system consists of 6-inch and 8-inch sewer mains and primarily serves the Julian central business district area. The sewer collection system includes approximately 3 miles of sewer pipe and a gravity conveyance line, which transports sewage to the Julian Sanitation District Wastewater Treatment Facility. The Julian service area's maximum daily wastewater treatment and discharge at the Julian Wastewater Facility is 0.040 million gallons. The District is currently operating with sufficient and excess capacity within its Julian service area.
- Pine Valley Sanitation District. Pine Valley Service District's service area is approximately 0.04 square miles and consists of approximately 0.5 miles of 8-inch sewer collection pipe, which conveys wastewater to a treatment plant. The Pine Valley service area's maximum daily wastewater treatment and discharge at the Pine Valley Wastewater Facility is 0.040 million gallons. All of the Pine Valley Service District's capacity is either committed or allocated.

Generally, those districts located near the City of San Diego use the PUD's system for treatment and effluent disposal. Unincorporated areas not serviced by wastewater districts typically utilize septic systems for wastewater disposal. The most common type of septic system found in San Diego County is an on-site wastewater treatment consisting of a septic tank connected to leach lines.

Wastewater Treatment and Disposal

The Wastewater Branch of Metro JPA's Public Utilities Department treats the wastewater generated in a 450-square-mile area stretching from Del Mar and Poway to the north, Alpine and Lakeside to the east, and south to the Mexico border. There are 3 wastewater treatment facilities that accept wastewater, and additional capacity is available at each facility (City of San Diego n.d.) (Table 2.18.2, presented at the end of this section).

Average daily flow at the Point Loma WWTP is 175 million gallons per day (mgd), and the capacity is 240 mgd. Effluent produced at this plant is discharged through the Point Loma Ocean Outfall into the Pacific Ocean. The SDCWA Biosolids Center processes organic material produced from material collected in the wastewater treatment process. The biosolids may be used to promote growth of agricultural crops, to fertilize gardens and parks, or to reclaim and replenish worn and nutrient-depleted land. The North City Water Reclamation Plant has a treatment capacity of 30 mgd and distributes reclaimed water throughout the northern region of San Diego via an extensive reclaimed water pipeline system. The North City Water Reclamation Plant processes 30 mgd with a planned expansion to 52 mgd capacity by 2035 (City of San Diego 2019). The South Bay Water Reclamation Plant has a capacity of 15 mgd. Effluent produced at this facility is distributed for beneficial reuse through recycled water distribution systems operated by the Otay Water District or discharged through the South Bay Ocean Outfall into the Pacific Ocean (City of San Diego n.d.).

Stormwater Drainage Facilities

A stormwater conveyance system, as defined by the County of San Diego Watershed Protection, Stormwater Management, and Discharge Control Ordinance, means "private and public drainage facilities other than sanitary sewers within the unincorporated areas of the county by which urban runoff may be conveyed to receiving waters, and includes, but is not limited to, roads, streets, constructed channels, aqueducts, storm drains, pipes, street gutters, inlets to storm drains or pipes, and catch basins." The stormwater conveyance system is designed to prevent flooding by transporting water away from developed areas.

2.18.1.3 *Energy*

Electricity and Natural Gas

San Diego County is served by San Diego Gas and Electric Company (SDG&E), which provides energy service to over 3.7 million customers (i.e., 1.49 million accounts) in the county and portions of southern Orange County. The utility has a diverse power production portfolio, composed of a variety of renewable and nonrenewable sources. Energy production typically varies by season and by year. Regional electricity loads also tend to be higher in the summer because the higher summer temperatures drive increased demand for air-conditioning. In contrast, natural gas loads are higher in the winter because the colder temperatures drive increased demand for natural gas heating.

In 2022 (most recent year for which California Renewables Portfolio Standard data are available), 55 percent of the electricity SDG&E supplied was from renewable sources (CPUC 2022).

Community Choice Aggregation (CCA) is a program that permits cities, counties, and other authorized entities, called Community Choice Aggregators, to purchase or generate electricity

for residents and businesses located within the boundaries of their jurisdiction. Two CCA providers, Clean Energy Alliance and San Diego Community Power, currently serve more than 80 percent of customers within SDG&E's service territory.

Natural Gas

Through a network of transmission pipelines, SDG&E and the Southern California Gas Company (SoCalGas) deliver natural gas across an approximately 20,000-square-mile service area that includes the San Diego region. SDG&E provides natural gas through 873,000 natural gas meters in San Diego County (SDG&E n.d.).

2.18.1.4 *Solid Waste*

The Solid Waste Local Enforcement Agency (LEA) is certified by the California Department of Resources Recycling and Recovery to enforce state solid waste laws and regulations in San Diego County, excluding the City of San Diego. The LEA has the primary responsibility for ensuring the proper operation, permitting, and closure of solid waste facilities, operations, and disposal sites. The LEA also has responsibilities for ensuring the review and approval of post-closure land use activities at closed solid waste disposal sites.

Until 1997, the solid waste management system in San Diego County was serviced by 8 landfill facilities. In October 1997, the County sold its active landfills and other solid waste collection assets to a private company, Allied Waste Industries, Inc. Currently, there are 6 active landfills in the San Diego region that serve residents, businesses, and military operations in both incorporated and unincorporated areas: Borrego, Miramar, Otay, Sycamore, Las Pulgas, and San Onofre. Solid waste is disposed of at the landfill of the hauling contractor's choice. The San Onofre and Las Pulgas landfills are owned and operated by the US Marine Corps and are not available for public disposal, and Miramar Landfill is operated on land leased from the US Navy by the City of San Diego. Table 2.18.3, presented at the end of this section, shows the maximum permitted capacity at each of the County's landfills.

Siting of a new solid waste disposal facility or expansion of an existing solid waste facility is often a controversial and lengthy process. All potential disposal facilities in the county must be included in a Countywide Siting Element Amendment to the San Diego County Integrated Waste Management Plan. However, discussion of proposed sites in the Siting Element is only one step in the review and approval process. In addition, each proposed facility in the county is considered through the local jurisdictional land use permitting processes. The *Five-Year Review Report for the Countywide Integrated Waste Management Plan for the County of San Diego* was most recently published in September 2022 and determined that the County has enough daily permitted disposal capacity until 2060, including the state-mandated 15-year period of 2022 to 2037. The Five-Year Review Report concluded that an amendment to the Countywide Siting Element is not warranted (County of San Diego 2022).

2.18.2 Regulatory Framework

2.18.2.1 *Federal*

There are no federal plans or programs that address utilities and service systems that would apply to the Cannabis Program.

2.18.2.2 *State*

Section 2.11, “Hydrology and Water Quality,” contains further descriptions of water resources policies and regulations.

State Water Resources Control Board

In California, SWRCB is responsible for ensuring the highest reasonable quality of waters of the state, while allocating those waters to achieve the optimum balance of beneficial uses. SWRCB’s current challenge is exacerbated by California’s rapid population growth and the continuing struggle over precious water flows. It faces tough new demands, which include fixing ailing sewer systems, building new wastewater treatment plants, and tackling the cleanup of underground water sources impacted by the very technology and industry that has catapulted California into global prominence. In addition, SWRCB will continue to focus on its most vexing problem of nonpoint source pollution, or polluted runoff, which is difficult to categorize, isolate, and resolve.

Urban Water Management Plan

In 1983, the California Legislature enacted the UWMPA (California Water Code Sections 10610–10656). The UWMPA states that every urban water supplier that provides water to 3,000 or more customers or that provides more than 3,000 acre-feet of water annually should make every effort to ensure the appropriate level of reliability in its water service sufficient to meet the needs of its various categories of customers during normal, dry, and multiple dry years. This effort includes the adoption of a UWMP by every urban water supplier and an update of the plan every 5 years on or before December 31 of every year ending in a 5 or 0. The UWMPA has been amended several times since 1983 with the most recent amendment occurring with Senate Bill (SB) 318 in 2004.

California Safe Drinking Water Act

The SWRCB Division of Drinking Water is responsible for implementing the federal Safe Drinking Water Act (SDWA) and its updates, as well as California statutes and regulations related to drinking water. State primary and secondary drinking-water standards are promulgated in California Code of Regulations (CCR) Title 22, Sections 64431–64501.

The California SDWA was passed in 1976 to build on and strengthen the federal SDWA. The California SDWA authorizes the Department Health Services to protect the public from contaminants in drinking water by establishing maximum contaminant levels that are at least as stringent as those developed by the US Environmental Protection Agency, as required by the federal SDWA.

California Water Code

The California Water Code contains provisions that control almost every consideration of water and its use. Division 2 of the California Water Code provides that the SWRCB shall consider and act upon all applications for permits to appropriate waters. Division 6 of the Water Code controls conservation, development, and utilization of the state water resources. Division 7 addresses water quality protection and management.

Commercial Cannabis Cultivation Licensing Requirements

The following cannabis cultivation regulations are associated with water supply and solid waste:

CCR, Title 4, Division 19, Section 15049.1: Additional Requirements for Recording Cultivation Activities

(b) The following information shall be reported in the track and trace system for each harvest batch:

(2) A cannabis waste management plan developed in accordance with section 17223.

CCR, Title 4, Division 19, Section 16309: Cultivation Plan Requirements

(a) Licensed cultivators shall establish and maintain a cultivation plan that includes all of the following:

(2) The weight of cannabis waste associated with each harvested plant.

CCR, Title 4, Division 19, Section 16311: Supplemental Water Source Information

The following information shall be provided for each water source identified by the applicant:

(a) Retail water supply sources:

(1) If the water source is a retail water supplier, as defined in section 13575 of the Water Code, such as a municipal provider, provide the following:

(A) Name of the retail water supplier; and

(B) A copy of the most recent water service bill or written documentation from the water supplier stating that service will be provided at the premises address.

(2) If the water source is a small retail water supplier, such as a delivery service, and is subject to section 26060.1(a)(1)(B) of the Business and Professions Code and the retail water supplier contract is for delivery or pickup of water from a surface water body or an underground stream flowing in a known and definite channel, provide all of the following:

(A) The name of the retail water supplier under the contract;

(B) The water source and geographic location coordinates, in either latitude and longitude or the California Coordinate System, of any point of diversion used by the retail water supplier to divert water delivered to the commercial cannabis business under the contract;

(C) The authorized place of use of any water right used by the retail water supplier to divert water delivered to the commercial cannabis business under the contract;

(D) The maximum amount of water delivered to the commercial cannabis business for cannabis cultivation in any year; and

(E) A copy of the most recent water service bill.

(3) If the water source is a small retail water supplier, such as a delivery service, and is subject to section 26060.1(a)(1)(B) of the Business and Professions Code and the retail water supplier contract is for delivery or pickup of water from a groundwater well, provide all of the following:

(A) The name of the retail water supplier under the contract;

(B) The geographic location coordinates for any groundwater well used to supply water delivered to the commercial cannabis business, in either latitude and longitude or the California Coordinate System;

(C) The maximum amount of water delivered to the commercial cannabis business for cannabis cultivation in any year;

(D) A copy of the well completion report filed with the Department of Water Resources pursuant to section 13751 of the Water Code for each percolating groundwater well used to divert water delivered to the commercial cannabis business. If no well completion report is available, the applicant shall provide evidence from the Department of Water Resources indicating that the Department of Water Resources does not have a record of the well completion report. When no well completion report is available, the State Water Resources Control Board may request additional information about the well; and

(E) A copy of the most recent water service bill.

(b) If the water source is a groundwater well, provide the following:

(1) The groundwater well's geographic location coordinates, in either latitude and longitude or the California Coordinate System; and

(2) A copy of the well completion report filed with the Department of Water Resources pursuant to section 13751 of the Water Code. If no well completion report is available, the applicant shall provide evidence from the Department of Water Resources indicating that the Department of Water Resources does not have a record of the well completion report. If no well completion report is available, the State Water Resources Control Board may request additional information about the well.

(c) If the water source is a rainwater catchment system, provide the following:

(1) The total square footage of the catchment footprint area(s).

(2) The total storage capacity, in gallons, of the catchment system(s).

(3) A detailed description and photographs of the rainwater catchment system infrastructure, including the location, size, and type of all surface areas that collect rainwater. Examples of rainwater collection surface areas include a rooftop and greenhouse.

(4) Geographic location coordinates of the rainwater catchment infrastructure in either latitude and longitude or the California Coordinate System.

(d) If the water source is a diversion from a waterbody (such as a river, stream, creek, pond, lake, etc.), provide any applicable water right statement, application, permit, license, or small irrigation use registration identification numb/er(s), and a copy of any applicable statement, registration certificate, permit, license, or proof of a pending application issued under part 2 (commencing with section 1200) of division 2 of the California Water Code as evidence of approval of a water diversion by the State Water Resources Control Board.

CCR, Title 4, Division 19, Section 17223: Waste Management

(a) A licensee shall dispose of all waste in accordance with the Public Resources Code and any other applicable state and local laws. It is the responsibility of the licensee to properly evaluate waste to determine if it should be designated and handled as a hazardous waste, as defined in Public Resources Code section 40141.

(b) A licensee shall establish and implement a written cannabis waste management plan that describes the method or methods by which the licensee will dispose of cannabis waste, as applicable to the licensee's activities. A licensee shall dispose of cannabis waste using only the following methods:

(1) On-premises composting of cannabis waste.

(2) Collection and processing of cannabis waste by a local agency, a waste hauler franchised or contracted by a local agency, or a private waste hauler permitted by a local agency in conjunction with a regular organic waste collection route.

(3) Self-haul cannabis waste to one or more of the following:

(A) A staffed, fully permitted solid waste landfill or transformation facility;

(B) A staffed, fully permitted composting facility or staffed composting operation;

(C) A staffed, fully permitted in-vessel digestion facility or staffed in-vessel digestion operation;

(D) A staffed, fully permitted transfer/processing facility or staffed transfer/processing operation;

(E) A staffed, fully permitted chip and grind operation or facility; or

(F) A recycling center as defined in title 14, California Code of Regulations, section 17402.5(d) that meets the following:

(i) The cannabis waste received shall contain at least ninety (90) percent inorganic material;

(ii) The inorganic portion of the cannabis waste is recycled into new, reused, or reconstituted products that meet the quality standards necessary to be used in the marketplace; and

(iii) The organic portion of the cannabis waste shall be sent to a facility or operation identified in subsections (b)(3)(A)-(E).

(4) Reintroduction of cannabis waste back into agricultural operation through on-premises organic waste recycling methods including, but not limited to, tilling directly into agricultural land and no-till farming.

(c) The licensee shall maintain any cannabis waste in a secured waste receptacle or secured area on the licensed premises until the time of disposal. Physical access to the receptacle or area shall be restricted to the licensee, employees of the licensee, the local agency, waste hauler franchised or contracted by the local agency, or private waste hauler permitted by the local agency only. Nothing in this subsection prohibits licensees from using a shared waste receptacle or area with other licensees, provided that the shared waste receptacle or area is secured and access is limited as required by this subsection.

(d) A licensee that disposes of waste through an entity described in subsection (b)(2) shall do all of the following:

(1) Maintain and make available to the Department upon request the business name, address, contact person, and contact phone number of the entity hauling the waste; and

(2) Obtain documentation from the entity hauling the waste that evidences subscription to a waste collection service.

State Water Resources Control Board, Cannabis Cultivation Policy

Attachment A of SWRCB Order WQ 2023-0102-DWQ establishes surface water diversion standards that are designed to protect surface water flow conditions and associated aquatic resources under Section 3, “Numeric and Narrative Instream Flow Requirements.” Sections 2.5, “Biological Resources,” and 2.11, “Hydrology and Water Quality,” contain further discussion of the Numeric and Narrative Instream Flow Requirements.

SWRCB’s Cannabis Cultivation Policy provides requirements for the treatment of wastewater associated with indoor cannabis cultivation, as well as wastewater created from the processing of cannabis (as defined in Attachment A of SWRCB Order WQ 2023-0102-DWQ as industrial wastewater). Indoor cannabis cultivation structure must either (1) discharge all industrial wastewaters generated to a permitted wastewater treatment collection system and facility that accepts cannabis cultivation wastewater, or (2) collect all industrial wastewater in an appropriate storage container to be stored and properly disposed of by a permitted wastewater hauler at a permitted wastewater treatment facility that accepts cannabis cultivation wastewater (Term 38 of Attachment A, Section 1 of SWRCB Order WQ 2023-0102-DWQ). Term 27 of Attachment A of SWRCB Order WQ 2023-0102-DWQ prohibits discharges of wastewater from cannabis manufacturing activities defined in Business and Professions Code Section 26100, indoor grow operations, or other industrial wastewater to an on-site wastewater treatment system (e.g., septic tank and associated disposal facilities), to surface water, or to land. Section 2.8, “Geology, Soils, and Mineral Resources,” provides further details regarding on-site wastewater treatment system regulations.

California Health and Safety Code

A public water system is defined in California Health and Safety Code Section 116275(h) as “a system for the provision of water for human consumption through pipes or other constructed

conveyances that has 15 or more service connections or regularly serves at least 25 individuals daily at least 60 days out of the year." Human consumption is defined in Section 116275(e) as "the use of water for drinking, bathing or showering, hand washing, oral hygiene, or cooking, including, but not limited to, preparing food and washing dishes."

California Integrated Waste Management Act

The California Integrated Waste Management Act of 1989 (Assembly Bill [AB] 939, Chapter 1095, Statutes of 1989) requires state, county, and local governments to substantially decrease the volume of waste disposed of at landfills by 2000 and beyond. The act requires each county to submit an integrated waste management plan that includes an adopted source reduction and recycling element from each of its cities, as well as a county-prepared source reeducation and recycling element for the unincorporated area. The element identifies existing and future quantities and types of solid waste, an inventory of existing disposal sites, a determination of the plan's economic feasibility, enforcement programs, and implementation schedule.

SB 1383 (Chapter 395, Statutes of 2016) and AB 1826 (Chapter 727, Statutes of 2014) have established additional waste reductions for organic waste. SB 1383 was placed in code and requires 50-percent reduction in organic waste levels in landfills from 2014 levels by 2020 and 75-percent reduction by 2025. AB 1826 requires businesses to recycle organic waste and requires local jurisdictions to implement an organic waste recycling program to divert organic waste generated by businesses.

California Code of Regulations, Energy Efficiency Standards

Energy consumption in new buildings in California is regulated by State Building Energy Efficiency Standards (CALGreen) contained in the CCR, Title 24, Part 2, Chapter 2-53. 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. The 2016 Building Energy Efficiency Standards have improved efficiency requirements from previous codes, and the updated standards are expected to result in a statewide consumption reduction.

2.18.2.3 *Local*

San Diego County General Plan

The following General Plan Update policies are applicable to the proposed Cannabis Program:

- **Policy COS-17.1: Reduction of Solid Waste Materials**. Reduce greenhouse gas emissions and future landfill capacity needs through reduction, reuse, or recycling of all types of solid waste that is generated. Divert solid waste from landfills in compliance with State law.
- **Policy COS-17.3: Landfill Waste Management**. Require landfills to use waste management and disposal techniques and practices to meet all applicable environmental standards.
- **Policy COS-17.4: Composting**. Encourage composting throughout the County and minimize the amount of organic materials disposed at landfills.

- **Policy LU-12.1: Concurrency of Infrastructure and Services with Development.** Require the provision of infrastructure, facilities, and services needed by new development prior to that development, either directly or through fees. Where appropriate, the construction of infrastructure and facilities may be phased to coincide with project phasing.
- **Policy LU-12.2: Maintenance of Adequate Services.** Require development to mitigate significant impacts to existing service levels of public facilities or services for existing residents and businesses. Provide improvements for Mobility Element roads in accordance with the Mobility Element Network Appendix matrices, which may result in ultimate build-out conditions that achieve an improved LOS but do not achieve a LOS of D or better.
- **Policy LU-13.1: Adequacy of Water Supply.** Coordinate water infrastructure planning with land use planning to maintain an acceptable availability of a high quality sustainable water supply. Ensure that new development includes both indoor and outdoor water conservation measures to reduce demand.
- **Policy LU-13.2: Commitment of Water Supply.** Require new development to identify adequate water resources, in accordance with State law, to support the development prior to approval.
- **Policy LU-14.2: Wastewater Disposal.** Require that development provide for the adequate disposal of wastewater concurrent with the development and that the infrastructure is designed and sized appropriately to meet reasonably expected demands.
- **Policy LU-14.5: Alternate Sewage Disposal Systems.** Support the use of alternative on-site sewage disposal systems when conventional systems are not feasible and in conformance with State guidelines and regulations.

San Diego County Board Policy I-24: Establishment of Assessment Districts to Provide for Public Improvements and Facilities for Flood Control and Damage

The San Diego County Board of Supervisors (Board) Policy I-24 establishes conditions for the use of financing districts for the construction of flood control and drainage facilities that benefit property or when conditions of safety and general welfare in any particular area warrant such action. As used herein, financing districts can include districts that utilize assessments, special taxes, or property-related fees to fund improvements or services. This policy will be reviewed for continuance by December 31, 2026.

San Diego County Board Policy I-48: Extending Sewer Lines within the San Diego County Sanitation District

Board Policy I-48 requires all sewer extensions to be accomplished by private contract.

San Diego County Board Policy I-51: Connection to Interceptor Sewers within the San Diego County Sanitation District

Board Policy I-51 states no service connections to interceptor sewers will be allowed unless connection to sewer is required by the Department of Environmental Health and the land use is consistent with land use approved by the Board. If connection is required by the County and the land use seeking connection is determined to by County staff to be in conformance with the

General Plan, the director of the Department of Public Works is delegated the authority to approve interceptor connections on behalf of the San Diego County Sanitation District.

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

Board Policy I-84 requires the applicable agency to issue an availability letter for prospective discretionary projects as a condition of County approval. This is to ensure that adequate facilities and capacity will be available at the time it is needed. The policy will be reviewed for continuance by December 31, 2025.

San Diego County Department of Environmental Health and Quality

DEHQ is the primary agency overseeing retail food safety, public housing, public swimming pools, small state drinking water systems, mobile-home parks, on-site wastewater systems, recreational water, aboveground and underground storage tanks and cleanup oversight, and medical and hazardous materials and waste. In addition, the County DEHQ provides technical assistance to the small drinking water systems in San Diego County. The purpose of the DEHQ Small Drinking Water System Program is to protect public health by helping water system owners and operators provide pure and safe drinking water by preventing waterborne diseases, identifying risks of bacteriological or chemical contamination, conducting inspections, providing technical assistance, and working in partnership with the small drinking water systems in San Diego County. In July 2022, San Diego County's community water systems, nontransient noncommunity water systems, and transient noncommunity water systems returned to the SWRCB Division of Drinking Water for oversight and regulation. DEHQ currently regulates only state small water systems.

DEHQ also acts as the Solid Waste Local Enforcement Agency, working to prevent the spread of diseases caused by rats and mosquitoes.

County of San Diego Integrated Waste Management Plan

The Board adopted the County of San Diego Integrated Waste Management Plan (IWMP) on September 17, 1996. The plan discusses the need for a reduction in solid waste and includes a Source Reduction and Recycling Element, Household Hazardous Waste Element, Non-Disposal Facility Element, Countywide Siting Element, and the Countywide Summary Plan. The Countywide Siting Element of the 1996 IWMP was updated in 2005, as required by the UWMPA. It provides a description of the facilities and strategies that will provide adequate capacity for the disposal of solid waste within the county, including alternatives, such as additional waste diversion programs and waste export. The Countywide Siting Element presents a strategy to assist local governments and private industry in planning for integrated waste management and the siting of solid waste disposal facilities. The goals and policies listed in the Countywide Siting Element are intended to assist all jurisdictions to plan and implement a solid waste management program. The Five-Year Review Report for the Countywide Integrated Waste Management Plan was most recently published in September 2022 and determined that the County has enough daily permitted disposal capacity until 2060, including the state-mandated 15-year period of 2022 to 2037. The Five-Year Review Report concluded that an amendment to the Countywide Siting Element is not warranted (County of San Diego 2022).

2.18.3 Analysis of Project Impacts and Determination of Significance

2.18.3.1 *Thresholds of Significance*

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

- require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects;
- have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years;
- result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments;
- generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; or
- comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

2.18.3.2 *Issues Not Discussed Further*

Water, Wastewater, Drainage, Energy, and Telecommunication Infrastructure

New commercial cannabis activities, including retail, cultivation, manufacturing, distribution, testing, consumption lounges, and microbusinesses, associated with the proposed Cannabis Program may construct or improve water, wastewater, stormwater drainage, electric power, natural gas (where available), and telecommunication facilities as needed based on site-specific conditions. Extension of these infrastructure facilities are expected to be limited because they are generally available along roadway frontage of the parcels or may be accommodated on the site. The potential environmental impacts of extending infrastructure off-site could be evaluated as part of subsequent application review by the County and the California Department of Cannabis Control (DCC). However, the overall environmental impacts for construction and operation of commercial cannabis uses (including those related to infrastructure facilities) have been programmatically evaluated in this Draft PEIR. Section 2.7, "Energy," analyzes energy use impacts, and Section 2.11, "Hydrology and Water Quality," analyzes drainage and water quality impacts. Implementation of the Cannabis Program would not trigger the need for the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. This issue is not further evaluated.

2.18.3.3 *Approach to Analysis*

Evaluation of potential utilities and service systems impacts is based on a review of existing documents and studies. Information obtained from these sources was reviewed and summarized to describe existing conditions and to identify potential environmental effects

based on the standards of significance presented in this section. In determining the level of significance, the analysis assumes that future commercial cannabis uses would comply with relevant state, and local laws, ordinances, and regulations.

The estimated water demands identified in Table 2.18.4, presented at the end of this section, were used in the water supply impact discussion below for future new licensed commercial cannabis uses by type for each alternative evaluated. This analysis addresses potential impacts to municipal water systems. The reader is referred to Section 2.11, "Hydrology and Water Quality," for an analysis of groundwater impacts.

2.18.3.4 *Issue 1: Adequate Water Supplies*

Guidelines for Determination of Significance

Based on Appendix G of the State CEQA Guidelines, the proposed Cannabis Program would have a significant impact if it would not have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.

Impact Analysis

Licensed commercial cannabis cultivation sites would require water supply for irrigation and operational demands. As described in Section 2.18.1, "Existing Conditions," available municipal water supply sources in the county consist of a variety of service providers located in the county. Water supply availability varies in the county based on local conditions and water sources.

SDCWA member districts would provide majority of water supplies for the Cannabis Program within the western portion of the county with groundwater as a secondary source. SDCWA water districts would provide water for both cultivation and operations. As identified in Table 2.18.4, future new cannabis uses in the county would demand approximately 668 acre-feet per year of water, a portion of which would be derived from municipal water sources. In the 2020 UWMPs, MWD, SDCWA, and all SDCWA member agencies that serve the unincorporated county determined that adequate water supplies would be available to serve existing service areas under normal water year, single dry water year, and multiple dry water year conditions through the year 2045. Future demand would be met (and in some cases water supply would exceed demand in some districts) by the supply in each 5-year increment through 2045, including in normal, single dry year, and multiple dry years.

To evaluate the potential impacts of the methods that may be used to obtain municipal water supply sources for the county, this document hereby incorporates by reference the impact conclusions identified in the Final Supplemental EIR for the SDCWA Regional Water Facilities Master Plan dated March 2013 (State Clearinghouse No. 2003021052). The EIR for the SDCWA Regional Water Facilities Master Plan evaluates a program of water supply projects. The Master Plan does not describe every proposed facility in detail but describes the types of facilities needed to meet the region's future water needs. The EIR for the SDCWA Regional Water Facilities Master Plan determined that multiple environmental impacts associated with the construction of water supply projects would potentially occur, including environmental impacts associated with the following environmental issues: land use, water resources, biological resources, transportation and traffic, noise, air quality, utilities and public services, aesthetics, geology and soils, cultural resources, public safety and hazardous materials, paleontological

resources, agricultural resources, and recreation. Of all the potential methods to ensure additional water supply, water conservation is the only approach that would not result in adverse environmental impacts.

Groundwater-dependent districts would be limited to the local groundwater resources in each service area. Section 2.11, “Hydrology and Water Quality,” contains further analysis of groundwater resources and impacts.

As described in Section 2.18.2, “Regulatory Framework,” licensed commercial cannabis cultivation uses are subject to the following regulation regarding water supply:

- CCR, Title 4, Division 19, Section 16311, which requires documentation of water supply sources to be used to be provided to the DCC.

The proposed Cannabis Zoning Ordinance Update includes the following requirements regarding water service provision in Section 6695(f)(5):

5. Water Source. Trucked water shall not be allowed except in case of emergency, as determined by the Director or their designee(s).

Water use for crop irrigation varies depending on weather factors, such as air temperature, relative humidity, wind speed, and solar radiation; soil factors, such as soil texture, structure, density, and chemistry; and plant factors, such as plant type, root depth, foliar density, height, and stage of growth. Water demand for agricultural activities can range from little to none for dry-land farmed areas to over 4 acre-feet per acre per year for irrigated alfalfa and other water-intensive plant types. The average applied water demand for San Diego agricultural uses is 2 acre-feet per year (County of San Diego 2011). For example, in 2023, 12,306 acres of avocados were harvested in San Diego County (County of San Diego 2023). According to agricultural groundwater demand estimates identified in a County-prepared groundwater study, avocados use 3.2 acre-feet per acre per year. Countywide, the Cannabis Program could result in up to 180 acres of cannabis cultivation canopy and future new cannabis uses in the county would demand up to 668 acre-feet per year of water (323 acre-feet per year for outdoor, mixed-light, and indoor cultivation facilities and 345 acre-feet per year for noncultivation facilities). In comparison to existing crops and water use associated with agricultural use, this would not be a substantial increase. However, it is unknown what amount of this projected water demand could be met by municipal water sources because commercial cannabis use water demands have not been specifically factored in the county UWMPs.

The UWMP prepared by SDCWA and its member agencies covers the next 20 years of water use in the county and anticipates changes in demand and circumstances that will affect supplies. However, uncertainty remains because commercial cannabis uses (i.e., cultivation) was not accounted for the in the projected demands. Because the proposed project would result in increased water demand for cultivation uses, it would contribute to the uncertainty of these plans. As a result, the effect on municipal water supply cannot be determined, but the project could contribute to the need to identify additional water supplies.

Noncultivation uses would likely obtain water supply from municipal water districts. As identified in Section 2.18.1, “Existing Conditions,” municipal water service providers in the county are anticipated to have sufficient water supply through 2045. The 2020 UWMPs concluded MWD, SDCWA, and all SDCWA member agencies that serve the unincorporated

county would have adequate water supplies that would meet or exceed water demand under normal water year, single dry water year, and multiple dry water year conditions through the year 2045. Depending on individual municipal water service provider capacity, this water could be available to licensed commercial cannabis noncultivation sites. It is assumed that noncultivation uses would likely be operated within existing commercial and industrial zones that are currently developed. Water demand would be similar for the underlying zoning types industrial, retail, and commercial uses. As noted in Table 1.4, it is anticipated that the majority of the uses would locate into existing industrial and retail buildings in the unincorporated area.

It is unknown to what extent cultivation uses under the Cannabis Program would obtain water supplies from municipal water districts. The analysis conservatively assumed the Cannabis Program, with an anticipated water demand of approximately 668 acre-feet per year of water would be served by municipal water sources. As identified previously, the 2020 UWMPs concluded MWD, SDCWA, and all SDCWA member agencies that serve the unincorporated county would have adequate water supplies that would meet or exceed water demand under normal water year, single dry water year, and multiple dry water year conditions through the year 2045. While noncultivation uses are similar to other nonresidential commercial uses, cultivation uses were not factored into water demand assumptions identified in the UWMPs. Therefore, water demand associated with the Cannabis Program would be in addition to water demands already identified. With respect to municipal water supplies, the Cannabis Program could result in significant impacts.

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 expand their existing facilities and operations to a total of 10,000 square feet of building area for each site. Assuming that these expansions involve new indoor cannabis cultivation uses, the potential expansion of the 5 sites could result as much as 5.6 acre-feet per year of total water demand (based on water demand ratios identified in Table 2.18.4).

As described in Section 2.18.1, “Existing Conditions,” the 2020 UWMPs concluded MWD, SDCWA, and all SDCWA member agencies that serve the unincorporated county would have adequate water supplies that would meet or exceed water demand under normal water year, single dry water year, and multiple dry water year conditions through the year 2045.

The impact on water supply 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 to certain state-defined sensitive uses, including schools, daycares, and youth centers.

As identified in Table 2.18.4, it is estimated that new commercial cannabis operations under Alternative 2 would have a total water demand of approximately 668 acre-feet per year. As described in Section 2.18.1, “Existing Conditions,” the 2020 UWMPs concluded MWD,

SDCWA, and all SDCWA member agencies that serve the unincorporated county would have adequate water supplies that would meet or exceed water demand under normal water year, single dry water year, and multiple dry water year conditions through the year 2045. However, water supply availability varies in the county based on local conditions and water sources of the service provider.

It is unknown to what extent cultivation uses under Alternative 2 would obtain water supplies from municipal water districts. While noncultivation uses are similar to other nonresidential commercial uses, cultivation uses were not factored into water demand assumptions identified in the UWMPs. Therefore, water demand associated with Alternative 2 would be in addition to water demands already identified.

The impact on water supply would be 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 expanded sensitive uses, including other cannabis facilities. Advertising of cannabis on billboards would also be prohibited within 1,000 feet of the expanded sensitive uses.

As identified in Table 2.18.4, it is estimated that new commercial cannabis operations under Alternative 3 would have a total water demand of approximately 668 acre-feet per year.

Similar to Alternative 2, it is unknown to what extent cultivation uses under Alternative 3 would obtain water supplies from municipal water districts. While noncultivation uses are similar to other nonresidential commercial uses, cultivation uses were not factored into water demand assumptions identified in the UWMPs. Therefore, water demand associated with Alternative 3 would be in addition to water demands already identified.

The impact on water supply would be 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 expanded sensitive uses, including other cannabis facilities. Advertising of cannabis on billboards would also be prohibited within 1,000 feet of the expanded sensitive uses.

As identified in Table 2.18.4, it is estimated that new commercial cannabis operations under Alternative 4 would have a total water demand of approximately 614 acre-feet per year.

Similar to Alternative 2, it is unknown to what extent cultivation uses under Alternative 4 would obtain water supplies from municipal water districts. While noncultivation uses are similar to other nonresidential commercial uses, cultivation uses were not factored into water demand

assumptions identified in the UWMPs. Therefore, water demand associated with Alternative 4 would be in addition to water demands already identified.

The impact on water supply would be 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 expanded sensitive uses, including other cannabis facilities. Advertising of cannabis on billboards would also be prohibited within 1,000 feet of the expanded sensitive uses. Alternative 5 also limits the size of outdoor cannabis cultivation canopy to 1 acre.

As identified in Table 2.18.4, it is estimated that new commercial cannabis operations under Alternative 5 would have a total water demand of approximately 668 acre-feet per year.

Similar to Alternative 2, it is unknown to what extent cultivation uses under Alternative 5 would obtain water supplies from municipal water districts. While noncultivation uses are similar to other nonresidential commercial uses, cultivation uses were not factored into water demand assumptions identified in the UWMPs. Therefore, water demand associated with Alternative 5 would be in addition to water demands already identified.

The impact on water supply would be significant under Alternative 5.

2.18.3.5 *Issue 2: Adequate Wastewater Treatment Capacity*

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 a determination by the wastewater treatment provider, which serves or may serve the project, that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

Impact Analysis

New commercial cannabis cultivation would require wastewater services, which may be provided using on-site systems, typically as septic tanks, or by connecting to a municipal wastewater treatment plant or facility. As described in Section 2.18.2, "Regulatory Framework," cannabis processing wastewater is defined as "industrial wastewater" under Attachment A of SWRCB Order WQ 2023-0102-DWQ. Term 27 of Attachment A, Section 1 of SWRCB Order WQ 2023-0102-DWQ prohibits discharges of wastewater from cannabis manufacturing activities defined in Business and Professions Code Section 26100, indoor grow operations, or other industrial wastewater to an on-site wastewater treatment system (e.g., septic tank and associated disposal facilities), to surface water, or to land. In addition, indoor commercial cannabis cultivation structure must either (1) discharge all industrial wastewaters generated to a permitted wastewater treatment collection system and facility that accepts cannabis

cultivation wastewater, or (2) collect all industrial wastewater in an appropriate storage container to be stored and properly disposed of by a permitted wastewater hauler at a permitted wastewater treatment facility that accepts cannabis cultivation wastewater (Term 38 of Attachment A, Section 1 of SWRCB Order WQ 2023-0102-DWQ). New licensed commercial cannabis operations would be required to receive approval for an individual septic facility and comply with the standards set forth in County Code Section 68.101, as well as SWRCB Order WQ 2023-0102-DWQ. Compliance with these standards would be consistent with applicable General Plan Policies LU-14.2 and LU-14.5, which support the use of alternative on-site sewage disposal systems when conventional systems are not feasible and in conformance with state guidelines and regulations. The County also requires that development projects (including commercial cannabis uses) proposing to use public wastewater systems include in their applications the necessary availability and commitment letters demonstrating sufficient wastewater treatment capacity and access to available wastewater conveyance facilities. This requirement is further enforced with Board Policies I-48, I-51, and I-84. Future development in the unincorporated county that would be allowed under the proposed Cannabis Program would be required to receive approval for individual septic use. Section 2.8, “Geology, Soils, and Mineral Resources,” contains further analysis of on-site wastewater disposal.

It is assumed that noncultivation uses would be operated within existing commercial and industrial zones that are currently developed. Sewer generation rates would be similar for the underlying zoning types, such as industrial and commercial uses, including retail and distribution. As noted in Table 1.4, it is anticipated that the majority of the uses would likely locate into existing industrial and retail buildings in the unincorporated area. Noncultivation uses would utilize existing connections to public wastewater conveyance systems, which would be required to comply with the standards set forth in the Zoning Ordinance (Sections 68.161 and 68.162), which specifies conditions and procedures for sewer facilities and sewer availability commitments from the provider, and County Fee Ordinances, which require annual sewer service, connection, and annexation fees. Wastewater treatment facility capacity in the county is shown in Table 2.18.2.

Through compliance with the regulations identified above, the proposed Cannabis Program would not result in a determination by the wastewater treatment provider, which serves or may serve the project, that it does not have adequate capacity to serve the subsequent commercial cannabis uses demands in addition to the provider’s existing commitments.

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 expand their existing facilities and operations to a total of 10,000 square feet of building area for each site that could result in additional wastewater generation.

As described above, compliance with SWRCB Order WQ 2023-0102-DWQ, the County’s Zoning Ordinance, and existing County wastewater requirements would ensure that wastewater generated by licensed commercial cannabis cultivation sites is treated properly and require demonstration that sufficient wastewater treatment capacity exists (Board Policy I-84). If adequate wastewater services are not available when factoring existing commitments, the commercial cannabis use would not be approved. Thus, no significant impacts to wastewater service capacity in addition to the provider’s existing commitments are expected.

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 to certain state-defined sensitive uses, including schools, daycares, and youth centers.

As described above, compliance with SWRCB Order WQ 2023-0102-DWQ, the County's Zoning Ordinance, and existing County wastewater requirements would ensure that wastewater generated by licensed commercial cannabis cultivation sites is treated properly and require demonstration that sufficient wastewater treatment capacity and access to available wastewater conveyance facilities exists (Board Policy I-84). If adequate wastewater services are not available when factoring existing commitments, the commercial cannabis use would not be approved. Thus, no significant impacts to wastewater service capacity in addition to the provider's existing commitments are expected

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 expanded sensitive uses, including other cannabis facilities. Advertising of cannabis on billboards would also be prohibited within 1,000 feet of the expanded sensitive uses.

Similar to Alternative 2, compliance with SWRCB Order WQ 2023-0102-DWQ, the County's Zoning Ordinance, and existing County wastewater requirements would ensure that wastewater generated by licensed commercial cannabis cultivation sites is treated properly and require demonstration that sufficient wastewater treatment capacity and access to available wastewater conveyance facilities exists (Board Policy I-84). If adequate wastewater services are not available when factoring existing commitments, the commercial cannabis use would not be approved. Thus, no significant impacts to wastewater service capacity in addition to the provider's existing commitments are expected.

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 expanded sensitive uses, including other cannabis facilities. Advertising of cannabis on billboards would also be prohibited within 1,000 feet of the expanded sensitive uses.

Similar to Alternative 2, compliance with SWRCB Order WQ 2023-0102-DWQ, the County's Zoning Ordinance, and existing County wastewater requirements would ensure that wastewater generated by licensed commercial cannabis cultivation sites is treated properly and require demonstration that sufficient wastewater treatment capacity and access to available wastewater conveyance facilities exists (Board Policy I-84). If adequate wastewater services are not available when factoring existing commitments, the commercial cannabis use would not be approved. Thus, no significant impacts to wastewater service capacity in addition to the provider's existing commitments are expected.

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 expanded sensitive uses, including other cannabis facilities. Advertising of cannabis on billboards would also be prohibited within 1,000 feet of the expanded sensitive uses. Alternative 5 also limits the size of outdoor cannabis cultivation canopy to 1 acre.

Similar to Alternative 2, compliance with SWRCB Order WQ 2023-0102-DWQ, the County's Zoning Ordinance, and existing County wastewater requirements would ensure that wastewater generated by licensed commercial cannabis cultivation sites is treated properly and require demonstration that sufficient wastewater treatment capacity and access to available wastewater conveyance facilities exists (Board Policy I-84). If adequate wastewater services are not available when factoring existing commitments, the commercial cannabis use would not be approved. Thus, no significant impacts to wastewater service capacity in addition to the provider's existing commitments are expected.

This impact would be less than significant under Alternative 5.

2.18.3.6 *Issue 3: Sufficient Landfill Capacity and Solid Waste Regulations*

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 generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; or not comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

Impact Analysis

Proposed commercial cannabis operations would generate solid waste from cannabis plant and product waste, as well as non-cannabis waste (e.g., vegetation clearing and other related solid waste). As described in Section 2.18.2, "Regulatory Framework," CCR, Title 4, Section 17223 requires cultivation facilities to have a cannabis waste management plan that identifies methods for managing cannabis waste, including on-premises composting, collection and processing by

an agency, or self-hauling to a permitted facility. Transportation of self-hauled cannabis waste shall be performed only by the licensee or employees of the licensee. A licensee must report all cannabis waste activities, up to and including disposal, into the state's track-and-trace system. CCR, Title 4, Division 19, Section 15049 requires that all disposed cannabis is entered into the track-and-trace system for disposal purposes is consistent with General Plan Policy COS-17.3. It is anticipated that some commercial cannabis cultivation operations would compost cannabis waste on-site consistent with General Plan Policy COS-17.4. Non-cannabis waste would be disposed of through existing transfer stations in the county, which would divert recyclable materials and dispose of remaining materials to available landfills.

New commercial cannabis noncultivation activities, including retail, cultivation, manufacturing, distribution, testing, and microbusinesses, would generate solid waste. New commercial cannabis cultivation sites would also be required to comply with CCR, Title 4, Section 17223 and 15049 regarding the implementation of a cannabis waste management plan and track and trace of cannabis product and materials to ensure proper transfer and disposal.

As noted above, several transfer station facilities in the county could accommodate non-cannabis waste. San Diego County operates 8 transfer stations that haul to 6 landfills. In addition, consistent with the availability of these facilities identified in Table 2.18.3 and through compliance with CCR, Title 4, Division 19, Section 17223 regulations, it is not expected that implementation of the Cannabis Program would generate solid waste in excess of state or local standards or in excess of the capacity of local infrastructure or otherwise impair the attainment of solid waste reduction goals. Furthermore, the Cannabis Program would comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

Alternative 1: No Project—Retention of Current Cannabis Regulations

Under Alternative 1, the Socially Equitable 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 expand their existing facilities and operations to a total of 10,000 square feet of building area for each site that could generate additional solid waste that may include additional cannabis waste.

As discussed above, commercial cannabis uses under the Cannabis Program would be required to comply with CCR, Title 4, Sections 17223 and 15049 regarding the implementation of a cannabis waste management plan and track and trace of cannabis product and materials to ensure proper transfer and disposal. Compliance with these standards would ensure cannabis waste is being handled consistent with state requirements and would not result in any foreseeable capacity issues at landfills serving San Diego County. Non-cannabis waste would be disposed of through existing transfer stations in the county, which would divert recyclable materials and dispose of remaining materials to available landfills. Consistent with the availability of these facilities identified in Table 2.18.3 and compliance with CCR, Title 4, Division 19, Section 17223 regulations, it is not expected that non-cannabis waste would generate solid waste in excess of state or local standards or in excess of the capacity of local infrastructure or otherwise impair the attainment of solid waste reduction goals. In addition, new commercial cannabis uses under the Cannabis Program would comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

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, new commercial cannabis uses under the Cannabis Program would be required to comply with CCR, Title 4, Sections 17223 and 15049 regarding the implementation of a cannabis waste management plan and track and trace of cannabis product and materials to ensure proper transfer and disposal. Compliance with these standards would ensure cannabis waste is being handled consistent with state requirements and would not result in any foreseeable capacity issues at landfills serving San Diego County. Non-cannabis waste would be disposed of through existing transfer stations in the county, which would divert recyclable materials and dispose of remaining materials to available landfills. Consistent with the availability of these facilities identified in Table 2.18.3 and compliance with CCR, Title 4, Division 19, Section 17223 regulations, it is not expected that non-cannabis waste would generate solid waste in excess of state or local standards or in excess of the capacity of local infrastructure or otherwise impair the attainment of solid waste reduction goals. In addition, new commercial cannabis uses under the Cannabis Program would comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

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 expanded sensitive uses, including other cannabis facilities. Advertising of cannabis on billboards would also be prohibited within 1,000 feet of the expanded sensitive uses.

As discussed above, new commercial cannabis uses under the Cannabis Program would be required to comply with CCR, Title 4, Sections 17223 and 15049 regarding the implementation of a cannabis waste management plan and track and trace of cannabis product and materials to ensure proper transfer and disposal. Compliance with these standards would ensure cannabis waste is being handled consistent with state requirements and would not result in any foreseeable capacity issues at landfills serving San Diego County. Non-cannabis waste would be disposed of through existing transfer stations in the county, which would divert recyclable materials and dispose of remaining materials to available landfills. Consistent with the availability of these facilities identified in Table 2.18.3 and compliance with CCR, Title 4, Division 19, Section 17223 regulations, it is not expected that non-cannabis waste would generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. In addition, new commercial cannabis uses under the Cannabis Program would comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

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 expanded sensitive uses, including other cannabis facilities. Advertising of cannabis on billboards would also be prohibited within 1,000 feet of the expanded sensitive uses.

As discussed above, new commercial cannabis uses under the Cannabis Program would be required to comply with CCR, Title 4, Sections 17223 and 15049 regarding the implementation of a cannabis waste management plan and track and trace of cannabis product and materials to ensure proper transfer and disposal. Compliance with these standards would ensure cannabis waste is being handled consistent with state requirements and would not result in any foreseeable capacity issues at landfills serving San Diego County. Non-cannabis waste would be disposed of through existing transfer stations in the county, which would divert recyclable materials and dispose of remaining materials to available landfills. Consistent with the availability of these facilities identified in Table 2.18.3 and compliance with CCR, Title 4, Section 17223 regulations, it is not expected that non-cannabis waste would generate solid waste in excess of state or local standards or in excess of the capacity of local infrastructure or otherwise impair the attainment of solid waste reduction goals. In addition, new commercial cannabis uses under the Cannabis Program would comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

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 expanded sensitive uses, including other cannabis facilities. Advertising of cannabis on billboards would also be prohibited within 1,000 feet of the expanded sensitive uses. Alternative 5 also limits the size of outdoor cannabis cultivation canopy to 1 acre.

As discussed above, new commercial cannabis uses under the Cannabis Program would be required to comply with CCR, Title 4, Section 17223 and 15049 regarding the implementation of a cannabis waste management plan and track and trace of cannabis product and materials to ensure proper transfer and disposal. Compliance with these standards would ensure cannabis waste is being handled consistent with state requirements and would not result in any foreseeable capacity issues at landfills serving San Diego County. Non-cannabis waste would be disposed of through existing transfer stations in the county, which would divert recyclable materials and dispose of remaining materials to available landfills. Consistent with the availability of these facilities identified in Table 2.18.3 and compliance with CCR, Title 4, Division 19, Section 17223 regulations, it is not expected that non-cannabis waste would generate solid waste in excess of state or local standards or in excess of the capacity of local infrastructure or otherwise impair the attainment of solid waste reduction goals. In addition, new commercial

cannabis uses under the Cannabis Program would comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

This impact would be less than significant under Alternative 5.

2.18.4 Cumulative Impacts

The cumulative context for utilities and service systems is the entire county, including incorporated areas, whose population is served by many individual utility, service system, and energy providers within specific service areas. Public utilities (water supply and wastewater services) provided by community service districts and other local service providers are limited to the local service districts and cumulative projects would not result in cumulative impact. Solid waste services are provided countywide and cumulative projects could result in a cumulative impact associated with insufficient capacity of landfill facilities.

2.18.4.1 *Issue 1: Adequate Water Supplies*

The San Diego County General Plan Update Draft EIR identified cumulatively considerable impacts regarding adequate water supplies from implementation of the General Plan (County of San Diego 2009).

As identified in the discussion of Issue 1, adequate water supplies generally exist in the unincorporated area of the county for Alternative 1. Expanded (Alternative 1) or new commercial cannabis cultivation uses would be subject to the water supply documentation, verification of adequate source of supply, and use restrictions requirements provided under CCR, Title 4, Section 16311.

According to SANDAG's forecasts, impacts related to water supply as a result of regional growth and land use change in 2050 would be significant. The UWMPs prepared by SDCWA and MWD indicate that there would be sufficient water supplies to provide for regional growth and land development through the year 2045. Subsequent to this time, however, documentation regarding sufficient supplies is unavailable, creating uncertainty about regional water supplies in 2050. This uncertainty means that there may be insufficient regional water supplies to meet regional water demand in 2050. The extent to which cannabis facilities approved under the proposed Cannabis Program under Alternatives 2, 3, 5, and 5 would rely on municipal water supply as the primary water source is unknown; however, the Cannabis Program may cause or contribute to reduced available water supply. Consequently, this impact would be cumulatively considerable under Alternatives 2, 3, 4, and 5.

2.18.4.2 *Issue 2: Adequate Wastewater Treatment Capacity*

The San Diego County General Plan Update Draft EIR identified no cumulatively considerable impacts regarding adequate wastewater services from implementation of the General Plan (County of San Diego 2009).

As identified in the discussion of Issue 2 for Alternatives 1 through 5, expanded (Alternative 1) or new commercial cannabis activities would be required to receive approval for an individual septic facility and comply with the standards set forth in County Code Section 68.101, as well as

SWRCB Order WQ 2023-0102-DWQ. The County also requires that development projects (including commercial cannabis uses) proposing to use public wastewater systems include in their applications the necessary availability and commitment letters demonstrating sufficient wastewater treatment capacity and access to available wastewater conveyance facilities. This requirement is further enforced with Board Policies I-48, I-51, and I-84. Future development in the unincorporated county that would be allowed under the proposed Cannabis Program would be required to receive approval for individual septic use. Section 2.8, "Geology, Soils, and Mineral Resources," contains further analysis of on-site domestic wastewater disposal. These requirements would offset any contributions to cumulative wastewater service impacts. Thus, the proposed Cannabis Program, in combination with the identified cumulative projects, would not result in a cumulatively considerable impact associated with wastewater service under Alternatives 1, 2, 3, 4, and 5.

2.18.4.3 *Issue 3: Sufficient Landfill Capacity and Solid Waste Regulations*

The San Diego County General Plan Update Draft EIR identified cumulatively considerable impacts regarding adequate landfill capacity from implementation of the General Plan (County of San Diego 2009).

Expanded (Alternative 1) or new commercial cannabis facilities would generate solid waste from cannabis plant and product waste, as well as non-cannabis waste. As described in Section 2.18.2, "Regulatory Framework," CCR, Title 4, Section 17223 requires cultivation facilities to have a cannabis waste management plan that identifies methods for managing cannabis waste, including on-premises composting, collection, and processing by an agency or self-hauling to a permitted facility. Transportation of self-hauled cannabis waste shall be performed only by the licensee or employees of the licensee. A licensee must report all cannabis waste activities, up to and including disposal, into the state's track-and-trace system. CCR, Title 4, Section 15049 requires that all disposed cannabis is entered into the track-and-trace system to ensure proper transfer and disposal. There are several transfer station facilities in the county could accommodate non-cannabis waste. The County of San Diego operates 8 transfer stations that haul to 6 landfills. In addition, consistent with the availability of these facilities identified in Table 2.18.3 and compliance with CCR, Title 4, Section 17223 regulations, it is not expected that implementation of the Cannabis Program would generate solid waste in excess of state or local standards or in excess of the capacity of local infrastructure or otherwise impair the attainment of solid waste reduction goals. The Cannabis Program would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Thus, the proposed Cannabis Program would not result in a cumulatively considerable impact associated with solid waste under Alternatives 1, 2, 3, 4, and 5.

2.18.5 Significance of Impact Prior to Mitigation

2.18.5.1 *Issue 1: Adequate Water Supplies*

The Cannabis Program would result in a less than significant impact to water supply under Alternative 1. The Cannabis Program would result in potentially significant direct impacts and significant cumulative impacts to water supply under Alternatives 2 through 5.

2.18.5.2 *Issue 2: Adequate Wastewater Treatment Capacity*

The Cannabis Program would not result in potentially significant impacts to wastewater facilities under Alternatives 1 through 5 and would not result in significant cumulative impacts associated with wastewater services for all alternatives.

2.18.5.3 *Issue 3: Sufficient Landfill Capacity and Solid Waste Regulations*

The Cannabis Program would not result in potentially significant impacts to solid waste services under Alternatives 1 through 5 and would not result in significant cumulative impacts associated with solid waste services for all alternatives.

2.18.6 Mitigation

2.18.6.1 *Issue 1: Adequate Water Supplies*

No mitigation is required for Alternative 1.

The following mitigation is identified for Alternatives 2, 3, 4, and 5.

M-UT.1-1: Obtain a Will Serve Letter to Demonstrate Adequate Water Supply

For municipal water use, project applicants shall obtain a will serve letter to provide verification that adequate water supplies are available as part of cannabis facility application submittals.

M-UT.1-2: Implement Water Conservation Measures

Applications for cannabis facilities shall include details on water conservation measures incorporated into the site design. Water conservation measures could include installation of water efficient plumbing fixtures and fittings and use of water-efficient landscaping, such as native plants and drip/subsurface irrigation. This shall include documentation of compliance with all applicable water conservation requirements associated with building features and landscaping.

2.18.6.2 *Issue 2: Adequate Wastewater Treatment Capacity*

No mitigation is required.

2.18.6.3 *Issue 3: Sufficient Landfill Capacity and Solid Waste Regulations*

No mitigation is required.

2.18.7 Conclusion

The discussion below provides a synopsis of the conclusion reached in each of the above impact analyses, and the level of impact that would occur after mitigation measures are implemented.

2.18.7.1 *Issue 1: Adequate Water Supplies*

Alternative 1 would result in a less than significant impact to water supply associated with municipal supplies. Implementation of the Cannabis Program under Alternatives 2 through 5 would result in the development of commercial cannabis facilities in some areas of the unincorporated county that would have the potential to increase municipal water demand. The proposed Cannabis Program would expand the extent of allowed commercial cannabis cultivation and noncultivation uses in the county. It is unknown to what extent cultivation uses would obtain water supplies from municipal water districts. Although noncultivation uses are similar to other nonresidential commercial uses, cultivation uses were not factored into water demand assumptions identified in the UWMPs. While mitigation measures have been identified to reduce water demand, they would not offset increases in total water demand. Therefore, water demand associated with Alternatives 2 through 5 would be in addition to water demands already identified, thus resulting in a water shortage under normal water year, single dry water year, and multiple dry water year conditions. Therefore, the impact would significant and unavoidable under Alternatives 2 through 5 under project and cumulative conditions.

2.18.7.2 *Issue 2: Adequate Wastewater Treatment Capacity*

Implementation of the Cannabis Program under Alternatives 1 through 5 would result in the development of commercial cannabis facilities in some areas of the unincorporated county that would have the potential to generate wastewater. Future commercial cannabis uses would be subject to County standards, as well as SWRCB Order WQ 2023-0102-DWQ, regarding public wastewater system adequacy and on-site wastewater disposal designed to protect public health and the environment. Therefore, the impact would be less than significant under Alternatives 1 through 5. In addition, the proposed Cannabis Program would not contribute to a significant cumulative impact.

2.18.7.3 *Issue 3: Sufficient Landfill Capacity and Solid Waste Regulations*

Implementation of the Cannabis Program under Alternatives 1 through 5 would result in the development of commercial cannabis facilities in some areas of the unincorporated county that would have the potential to generate solid waste. Because new commercial cannabis cultivation sites and noncultivation uses would comply with CCR, Title 4, Sections 17223 and 15049, the impact related to generating solid waste in excess of infrastructure capacity would be less than significant. Therefore, the impact would be less than significant under Alternatives 1 through 5. In addition, the proposed Cannabis Program would not contribute to a significant cumulative impact.

Table 2.18.2 Wastewater Treatment Plants in San Diego County

Facility Name	Facility Type	Treatment Capacity (mgd)
Point Loma Wastewater Treatment Plant	Wastewater treatment plant	240
South Bay Reclamation Plant	Recycled water plant	15
North City Water Reclamation Plant	Recycled water plant	30

Notes: mgd = million gallons per day.

Source: City of San Diego n.d.

Table 2.18.3 Active Solid Waste Facilities in San Diego County

Facility Name	Operator	Remaining Capacity (cubic yards)	Estimated Closure Date
Miramar	City of San Diego	11,080,871	2031
Otay	Republic Services	11,122,997	2030
Borrego	Republic Services	88,750	2046
Las Pulgas	US Marine Corps	5,657,717	2060
San Onofre	US Marine Corps	1,057,605	2031
Sycamore	Republic Services	105,064,991	2042

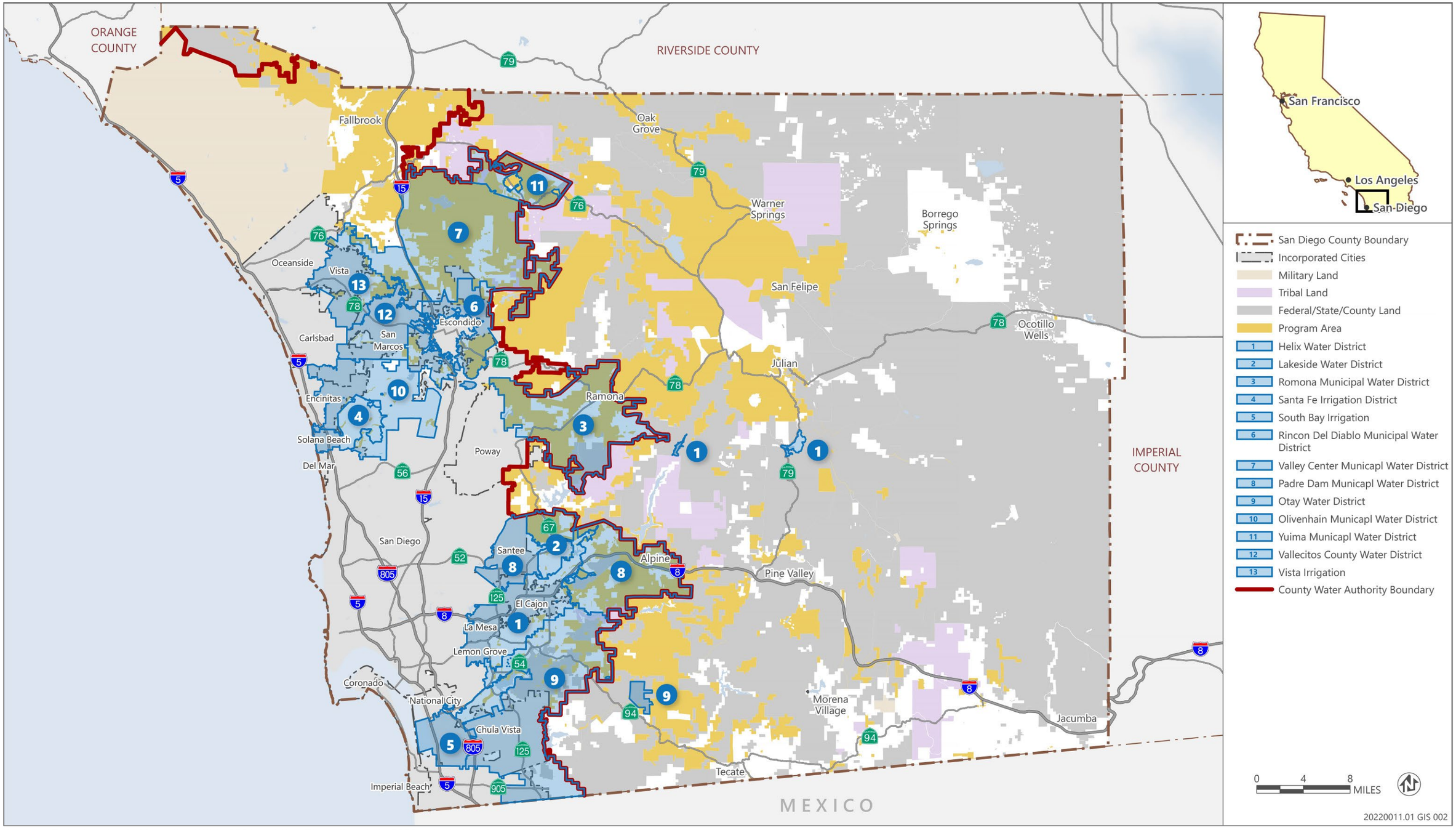
Source: County of San Diego 2022.

Table 2.18.4 Estimated Project Irrigation Water Demand for Future New Commercial Cannabis Cultivation, Processing, and Distribution Uses

Cannabis Facility Type	Demand Ratio	Estimated Demand for Alternatives 2, 3, and 5	Estimated Demand for Alternative 4
Outdoor	1.39 acre-feet per acre per year	181	0
Mixed-light	2.65 acre-feet per acre per year	122	186
Indoor	4.88 acre-feet per acre per year	20	83
Nursery	4.88 acre-feet per acre per year	188	188
Processing	0.35 acre-feet per site per year	2	2
Manufacturing	1.4 acre-feet per site per year	35	35
Testing	0.84 acre-feet per site per year	2	2
Distribution	0.18 acre-feet per site per year	9	9
Retail	1.44 acre-feet per site per year	89	89
Microbusiness	1.26 acre-feet per site per year	20	20
Total		**668**	**614**

Note: It is assumed that nursery water demands would be similar to indoor commercial cannabis cultivation water demands.

Sources: Compiled by Ascent in 2024. Acreages and associated square footages derived from Table 1.4. Demand ratio provided by Table 3.10-9 of the Yolo County Cannabis Land Use Ordinance Draft EIR (Yolo County 2019). These demand ratios were developed based on water demand factors were derived from information provided by existing cannabis cultivation operations in the in other counties in northern and central California (Yolo, Humboldt, Trinity, and Santa Cruz counties) and commercial and industrial water demand factors for noncultivation uses.



Sources: Data downloaded from SanGIS in 2021 and San Diego County in 2023; adapted by Ascent in 2024.

Figure 2.18.1 **Water Service Districts**