

## CHAPTER 4 ALTERNATIVES

### 4.1 Introduction

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

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

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

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

The State CEQA Guidelines require that the EIR include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. If an alternative would cause 1 or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative must be discussed, but in less detail than the significant effects of the project as proposed (Section 15126.6(d)).

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

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

Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects

with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.

In determining what alternatives should be considered in the EIR, it is important to consider the objectives of the project, the project's significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a). Although, as noted above, EIRs must contain a discussion of "potentially feasible" alternatives, the ultimate determination as to whether an alternative is feasible or infeasible is made by the lead agency's decision-making body—here, the San Diego County Board of Supervisors (Board). (See PRC Sections 21081.5, 21081(a)(3).) The Board, for example, may conclude that a particular alternative is infeasible (i.e., undesirable) from a policy standpoint and may reject an alternative on that basis provided that the Board adopts a finding, supported by substantial evidence, to that effect and provided that such a finding reflects a reasonable balancing of the relevant economic, environmental, social, and other considerations supported by substantial evidence.

As described in Chapter 1, "Project Description, Location, and Environmental Setting," this Draft PEIR evaluates the following 5 alternatives at an equal level of detail:

- Alternative 1: No Project—Retention of Current Cannabis Regulations
- Alternative 2: Proposed Project—Cannabis Program Consistent with State Requirements
- Alternative 3: Cannabis Program with Expanded County Regulations
- Alternative 4: Cannabis Program with Outdoor Cannabis Cultivation Prohibition
- Alternative 5: Cannabis Program with Maximum 1 Acre of Outdoor Cannabis Cultivation Canopy

This chapter compares the environmental impacts of the 5 program alternatives and identifies the environmentally superior alternative.

## **4.2 Rationale for Alternative Selection**

### **4.2.1 Attainment of Project Objectives**

As described above, one factor that must be considered in selection of alternatives is the ability of a specific alternative to attain most of the basic objectives of the project (State CEQA Guidelines, Section 15126.6(a)). Chapter 1, "Project Description, Location, and Environmental Setting," articulated the following project objectives, which are repeated below:

- develop a regulated and legal cannabis industry that allows for greater economic opportunity and safe access to cannabis;
- provide consistency with state law and County regulations associated with commercial cannabis operations;
- prioritize social equity, economic access, and business opportunities for those who have been impacted by cannabis-related criminalization and the War on Drugs;

- develop an efficient and user-friendly cannabis licensing and permitting system;
- develop a regulatory program that will assist in protecting public health, safety, and welfare;
- minimize the effects of commercial cannabis activities on sensitive populations and land uses;
- minimize the potential adverse effects of cannabis activities on the environment, natural resources, and wildlife, including wetlands and sensitive habitats, narrow endemic species, and vernal pools, as well as effects on water supply, water quality, and instream flows; and
- develop and implement a program designed to support and encourage farming in San Diego County, preserve agricultural land, and create new opportunities for farmers.

Alternative 1, the No-Project Alternative, would not meet any of the project objectives because it would not involve implementation of a cannabis program in San Diego County; rather, development and operation of new cannabis facilities would continue to be prohibited. Alternatives 2, 3, 4, and 5 differ in regard to the definition and buffer distance from sensitive uses, allowed license types, and allowed maximum outdoor cultivation canopy. However, these 4 alternatives would develop a cannabis program generally consistent with the project objectives listed above.

#### **4.2.2 Environmental Impacts of the Cannabis Program**

Sections 2.2 through 2.19 of this Draft PEIR identify the environmental impacts of the proposed Cannabis Program and contain an equal-level evaluation of Alternative 1, the No-Project Alternative; Alternative 2, the proposed project; and Alternatives 3, 4, and 5, the program alternatives. A summary of the impacts of each alternative, compared to the existing conditions, can be found within each resource section (in the “Conclusion” subsection within Sections 2.2 through 2.19). Of the issues evaluated in Chapter 2, “Significant Environmental Effects of the Proposed Project,” of this Draft PEIR, implementation of the Cannabis Program would result in the following significant and unavoidable impacts:

- Aesthetics, Issue 2: Substantially Degrade Visual Character or Quality (Alternatives 2, 3, 4, and 5)
- Air Quality, Issue 3: Result in Emissions of Odors Adversely Affecting a Substantial Number of People (Alternatives 2, 3, and 5)
- Hydrology and Water Quality, Issue 2: Substantial Decrease of Groundwater Supplies or Interfere Substantially with Groundwater Recharge (Alternatives 2, 3, 4, and 5)
- Noise, Issue 1: Excessive Temporary (Construction-Related) Noise Levels (Alternatives 2, 3, 4, and 5)
- Transportation, Issue 2: Exceed the Threshold for Vehicle Miles Traveled (VMT) (Alternatives 2, 3, 4, and 5)
- Utilities and Service Systems, Issue 1: Adequate Water Supplies (Alternatives 2, 3, 4, and 5)

The remaining environmental effects of the program alternatives were determined not to be significant or could be reduced to a less-than-significant level after implementation of feasible

mitigation measures. As discussed throughout Chapter 2 of this Draft PEIR, Alternative 1 would result in no significant environmental impacts. The development potential under Alternatives 3 and 5 would be the same as under Alternative 2; thus, impacts related to development area, operational demand for resources, earth-moving activities, and canopy area would generally be similar because the potential to affect these resources areas would be the same. In contrast, because the development potential of commercial cannabis cultivation sites under Alternative 4 would be less than proposed under Alternative 2, impacts related to development area, operational demand for resources, earth-moving activities, and canopy area would be less compared to Alternative 2 because the potential to affect these types of impacts would be less. Impacts related to development area, operational demand for resources, earth-moving activities, and canopy area consist of the following resource areas:

- aesthetics (with the exception of Issue 2, discussed in more detail below);
- air quality (with the exception of Issue 3, discussed in more detail below);
- biological resources;
- cultural and paleontological resources;
- energy;
- geology, soils, and mineral resources;
- greenhouse gas emissions and climate change
- hazards and hazardous materials;
- hydrology and water quality (with the exception of Issue 2, addressed in more detail below);
- noise (with the exception of Issue 1, addressed in more detail below);
- transportation (with the exception of Issue 2, addressed in more detail below);
- tribal cultural resources;
- utilities and service systems (with the exception of Issue 1, addressed in more detail below); and
- wildfire.

None of the alternatives would induce substantial unplanned population growth in the county because employment levels for potential cannabis facilities would be within regional growth projections; thus, the impacts would be similar among the program alternatives compared to Alternative 2. With respect to public services, compliance with state and local regulations applicable to the program alternatives would ensure that sufficient fire and law enforcement services are available to serve new cannabis facilities, such that no new fire or law enforcement facilities would need to be constructed to support new cannabis facilities; thus, impacts related to public services would be similar under the program alternatives compared to Alternative 2. Because the application requirements and performance standards of the Cannabis Program would be the same among the program alternatives, impacts to land use and planning would be similar under the program alternatives compared to Alternative 2. Finally, because cannabis would be considered an agricultural use, there would be no impacts to agricultural resources under any of the alternatives; thus, impacts under the program alternatives would be similar to Alternative 2.

### **4.3 Alternatives Considered but Not Evaluated Further**

As described above, State CEQA Guidelines Section 15126.6(c) provides that the range of potential alternatives for the project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen 1 or more of the significant effects. Alternatives that fail to meet the fundamental project purpose need not be addressed in detail in an EIR. The EIR should also identify any alternatives that were considered by the lead agency but were rejected during the planning or scoping process and briefly explain the reasons underlying the lead agency's determination.

The following alternative was considered by San Diego County but is not evaluated further in this Draft PEIR for the reasons described below.

#### **4.3.1 Ban on Commercial Cannabis Activities in the County**

Under this alternative, the County would implement a ban on commercial cannabis activities. No new commercial cannabis activities, including retail, cultivation, manufacturing, distribution, testing, microbusinesses, temporary events, and on-site consumption, would be allowed. This alternative would also result in the cessation of commercial cultivation cannabis operations currently allowed under the County Zoning Ordinance Section 6861 (Nonconforming Cannabis Facilities) and under Title 2, Division 1, Chapter 25 of the County Code of Regulatory Ordinances (Regulatory Code). Under this alternative, the 5 existing commercial cannabis facilities, which are located in the unincorporated areas of El Cajon, Escondido, and Ramona, would be restored to their preexisting conditions. Enforcement activities would be undertaken by the County and other agencies, if necessary, to ensure proper closure of existing commercial cannabis operations.

This alternative was determined early on to be infeasible. It would be inconsistent with the passage of state Proposition 64 (Marijuana Legalization in 2016) and with San Diego County voter passage of Measure A (Cannabis Business Tax in 2022), authorizing the County to impose a general tax on the square footage of cultivation, as well as the gross receipts of commercial cannabis, including manufacturing, testing, distribution, and retail sales in unincorporated San Diego County. This alternative also would not be consistent with any of the project objectives listed above; thus, it is not considered further.

### **4.4 Analysis of the Alternatives**

As described above, the Cannabis Program would result in significant and unavoidable impacts associated with aesthetics, air quality, hydrology and water quality, noise, transportation, and utilities and service systems. Thus, these topics are the focus of the below alternatives analysis. Conclusions for each alternative are characterized as "greater," "similar," or "less" to describe conditions that are worse than, similar to, or better than those of Alternative 2.

#### **4.4.1 Aesthetics, Issue 2: Substantially Degrade Visual Character or Quality**

Cannabis facilities associated with the Cannabis Program consist of cannabis storefront, non-storefront retail, and consumption lounges; cannabis cultivation facilities; cannabis manufacturing facilities; cannabis distribution facilities; cannabis microbusinesses; cannabis testing laboratories; and cannabis temporary events. Compliance with regulations and regulatory processes would reduce the likelihood that commercial cannabis facilities would degrade visual character or quality throughout the unincorporated county, particularly in

agricultural and rural areas, or conflict with applicable zoning and other regulations governing scenic quality in urbanized areas. Nevertheless, aesthetic impacts are subjective, and cannabis uses have distinctly recognizable visual characteristics as compared to other traditional forms of agriculture in the unincorporated county (e.g., security fencing), as well as the potential for concentration of cannabis facilities in some areas of the county.

This impact would be significant and unavoidable under Alternative 2.

#### **4.4.1.1 *Alternative 1 (Less than Significant)***

The Cannabis Program would have a less-than-significant impact on aesthetics resources under Alternative 1 because site expansion at each of the 5 sites would be limited to 10,000 square feet of building area and no new cannabis uses would be allowed in the county. Thus, impacts on visual character or quality under Alternative 1 would be less than under Alternative 2. (*Less, eliminates a significant and unavoidable impact*)

#### **4.4.1.2 *Alternative 3 (Significant and Unavoidable)***

Alternative 3 would expand the definition of “sensitive uses” and increase buffers from these uses from 600 to 1,000 feet. A 600-foot buffer, or the length of 2 football fields, would generally be sufficient to limit detailed view of a billboard or business storefront, and although 1,000 feet would further limit the visual impact through minimizing the potential of the clustering of commercial cannabis facilities together, it would not substantially decrease the impact because businesses would not appear substantially different. (*Similar*)

#### **4.4.1.3 *Alternative 4 (Significant and Unavoidable)***

Alternative 4 would implement the same setback and buffer requirements as described above under Alternative 3 but would also prohibit outdoor cultivation. As discussed above, expansion of buffers from 600 to 1,000 feet would not substantially affect visual character or quality, although 1,000 feet would further limit the visual impact through minimizing the potential of the clustering of commercial cannabis facilities together. While aesthetics are generally considered subjective, elimination of outdoor cannabis cultivation landscape features, such as agricultural shade or crop structures, storage buildings, and enclosed fenced cannabis cultivation areas, would result in a lesser impact than under Alternative 2 because these features would not be developed in the county under Alternative 4. (*Less*)

#### **4.4.1.4 *Alternative 5 (Significant and Unavoidable)***

Alternative 5 would contain the same setback and buffer requirements as described above for Alternatives 3 and 4. As discussed above, expansion of buffers from 600 to 1,000 feet would not substantially affect visual character or quality, although 1,000 feet would further limit the visual impact through minimizing the potential of the clustering of commercial cannabis facilities together. While outdoor cultivation under Alternative 5 would be limited to 1 acre of total canopy area, or 25 percent of the lot size, whichever is less, landscape features such as agricultural shade or crop structures, storage buildings, and enclosed fenced cannabis cultivation areas would nevertheless be introduced into the county and would result in similar impacts to visual character and quality compared to Alternative 2. (*Similar*)

#### **4.4.2 Air Quality, Issue 3: Result in Emissions of Odors Adversely Affecting a Substantial Number of People**

Commercial cannabis uses have the potential to generate nuisance odors. Cannabis plants are known to emit odors, especially during the final stages of the growing cycle (i.e., typically beginning in August and continuing through the harvest season, in September and October for outdoor cultivation). The potential for detected odors to be considered objectionable and an adverse effect would depend on the size of the cannabis-related operation, the location of the receptor, the presence of nearby vegetation, and topographic and atmospheric conditions. There are no feasible mitigation measures to avoid the potential for occasional odor nuisance impacts because there is no reliable method to contain odors on-site under all atmospheric conditions during harvest season. Thus, there are no effective mitigation measures to ensure elimination of cannabis odors.

This impact would be significant and unavoidable under Alternative 2.

##### **4.4.2.1 Alternative 1 (Less than Significant)**

The Cannabis Program would have less-than-significant impacts associated with odors under Alternative 1 because existing commercial cannabis facilities will 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. However, no new commercial cannabis uses would be allowed. These expansions would not generate significant construction or operational odors beyond existing cannabis cultivation operations. Thus, odor-related impacts under Alternative 1 would be less than under Alternative 2. (*Less, eliminates a significant and unavoidable impact*)

##### **4.4.2.2 Alternative 3 (Significant and Unavoidable)**

Alternative 3 would expand the definition of “sensitive uses” and increase buffers from these uses from 600 to 1,000 feet. Although odor-related impacts would be significant and unavoidable under Alternative 3, the increased buffer for sensitive uses would minimize impacts. Thus, odor-related impacts would be less under Alternative 3 compared to Alternative 2. (*Less*)

##### **4.4.2.3 Alternative 4 (Less than Significant)**

Alternative 4 would prohibit outdoor cannabis cultivation. Thus, all cannabis cultivation operations would be contained within a building and would be subject to Cannabis Program and Regulatory Code requirements, which include the implementation of an odor mitigation plan and odor control requirements that prohibits cannabis odors from being detected outside of the cannabis premises. These requirements would reduce odor impacts to a less-than-significant level. Thus, impacts under Alternative 4 would be less than under Alternative 2. (*Less, eliminates a significant and unavoidable impact*)

##### **4.4.2.4 Alternative 5 (Significant and Unavoidable)**

Alternative 5 contains the same setback and buffer requirements as described above for Alternatives 3 and 4. Although odor-related impacts would be significant and unavoidable

under Alternative 5, the increased buffer for sensitive uses would minimize impacts. Thus, odor-related impacts would be less under Alternative 5 compared to Alternative 2. (*Less*)

#### **4.4.3 Hydrology and Water Quality, Issue 2: Substantial Decrease of Groundwater Supplies or Interfere Substantially with Groundwater Recharge**

New cannabis uses would increase water demand in the county, a portion of which would be derived from groundwater sources. The proposed zoning ordinance changes under the proposed Cannabis Program establish use types that would require issuance of a zoning verification permit that meet specified criteria. For zoning verification of use types that include cultivation less than 5,000 square feet or less in canopy area, distribution, manufacturing, testing laboratories and retail, this would require a letter report signed by a California Professional Geologist which concludes that extraction of groundwater is not likely to interfere with production and functioning of existing nearby wells and not likely to substantially decrease groundwater supplies. If a Cannabis Program applicant would require groundwater as a water supply for a discretionary permit, requirements would include evaluation of potential groundwater impacts. Although the Groundwater Ordinance contains standards for well construction, repair, reconstruction, and destruction, it does not place requirements on groundwater production rates or requirements concerning groundwater availability. Because of the uncertainty of available groundwater resources in fractured-rock aquifer conditions, additional groundwater draw down associated with a project approved under the proposed Cannabis Program may result in a groundwater overdraft condition, low well yield, or well interference. It cannot be known at this time where new wells may be constructed or where groundwater production may increase; thus, this impact would be potentially significant.

This impact would be significant and unavoidable under Alternative 2.

##### **4.4.3.1 *Alternative 1 (Less than Significant)***

No new cannabis uses would be allowed in the county under Alternative 1. However, the existing 5 sites could expand up to 10,000 square feet each. All of the existing sites are supplied water through municipal services districts; thus, there would not be site-specific wells used for these operations. Thus, impacts on groundwater supplies under Alternative 1 would be less than under Alternative 2. (*Less, eliminates a significant and unavoidable impact*)

##### **4.4.3.2 *Alternative 3 (Significant and Unavoidable)***

Under Alternative 3, future new cannabis uses in the county are projected to demand the same quantity of water (668 afy) and are estimated to require the same total building area as Alternative 2 (i.e., potential to affect groundwater recharge), as identified in Table 1.4; thus, there would be similar effects related to reduced groundwater supplies under Alternative 3 as under Alternative 2. (*Similar*)

##### **4.4.3.3 *Alternative 4 (Significant and Unavoidable)***

Under Alternative 4, future new cannabis uses in the county are projected to demand a smaller quantity of water (614 afy under Alternative 4 versus 668 afy under Alternative 2); thus, there would be lesser potential for reduced groundwater supplies under Alternative 4 than under Alternative 2. (*Less*)



#### **4.4.3.4 Alternative 5 (Significant and Unavoidable)**

Under Alternative 5, future new cannabis uses in the county are projected to demand the same quantity of water (668 afy) and are estimated to require the same total building area (i.e., potential to affect groundwater recharge); thus, there would be similar effects related to reduced groundwater supplies under Alternative 5 as under Alternative 2. (*Similar*)

#### **4.4.4 Noise, Issue 1: Excessive Temporary (Construction-Related) Noise Levels**

Depending on the existing ambient noise levels of the proposed cannabis site, construction noise could result in a substantial temporary noise increase (i.e., +10 decibels [dBA]) in the project vicinity. In accordance with Section 36.408 of the Regulatory Code, construction activities would occur during daytime hours (i.e., between 7:00 a.m. and 7:00 p.m.) when receptors are less sensitive to increased noise levels; however, the County has not adopted daytime construction noise exemptions. Commercial cannabis sites constructed under the Cannabis Program would be required to comply with Sections 36.408 and 36.409 of the Regulatory Code, which regulate construction-related noise to ensure that the applicable sound level standards would not be exceeded. However, considering that specific details of individual future commercial cannabis sites associated with the Cannabis Program—such as locations of future sites and their distance to sensitive receptors—are currently unknown, it cannot be guaranteed that construction noise would not result in a substantial temporary increase in noise at existing sensitive receptors as defined in the County's General Plan, which includes residential uses, either because the County's construction noise standard of 75 dBA equivalent continuous sound level ( $L_{eq}$ ) would be exceeded or because construction activity would increase the ambient noise level at sensitive receptors beyond 10 dBA.

This impact would be significant and unavoidable under Alternative 2.

##### **4.4.4.1 Alternative 1 (Less than Significant)**

The Cannabis Program would have a less-than-significant impact on construction noise under Alternative 1 because site expansion at each of the 5 sites would be limited to 10,000 square feet of building area in areas where sensitive receptors would not be impacted and no new cannabis uses would be allowed in the county. Thus, construction noise impacts under Alternative 1 would be less than under Alternative 2. (*Less, eliminates a significant and unavoidable impact*).

##### **4.4.4.2 Alternative 3 (Significant and Unavoidable)**

Alternative 3 prohibits the development of cannabis facilities within 1,000 feet of sensitive uses beyond what is identified in Alternative 2. However, construction activities for future new cannabis uses in the county are anticipated to be similar to Alternative 2. Thus, there would be similar construction noise effects under Alternative 3 as under Alternative 2. (*Similar*)

##### **4.4.4.3 Alternative 4 (Significant and Unavoidable)**

Alternative 4 prohibits the development of cannabis facilities within 1,000 feet of sensitive uses beyond what is identified in Alternative 2 as well as prohibits the development of outdoor cannabis uses. However, construction activities for future new cannabis uses in the county are

anticipated to be similar to Alternative 2. Thus, there would be similar construction noise effects under Alternative 4 as under Alternative 2. (*Similar*)

#### **4.4.4.4 Alternative 5 (Significant and Unavoidable)**

Alternative 5 prohibits the development of cannabis facilities within 1,000 feet of sensitive uses beyond what is identified in Alternative 2. However, construction activities for future new cannabis uses in the county are anticipated to be similar to Alternative 2. Thus, there would be similar construction noise effects under Alternative 5 as under Alternative 2. (*Similar*)

#### **4.4.5 Transportation, Issue 2: Exceed the Threshold for VMT**

The County of San Diego Transportation Study Guidelines (adopted on September 2022) include a list of screening criteria for land use and transportation projects that are presumed to generate a less-than-significant VMT impact. Small projects that are estimated to generate less than 110 average daily vehicle trips (ADT) can be presumed to result in a less-than-significant VMT impact. For cannabis facilities located outside of a VMT efficient area, infill village area, or a transit accessible area, the VMT could exceed the allowable thresholds identified by the County and could potentially result in a significant VMT-related impact. However, cannabis projects that are not within a location-based screening criterion could still potentially be screened out via the Small Employment Project or the Locally Serving Retail Projects criteria, if they are within screening thresholds (i.e., facility size) presented in Table 2.16.2 in Section 2.16, "Transportation."

Therefore, the potential for the Cannabis Program to exceed the County's threshold for VMT under Alternative 2 would be significant and unavoidable.

#### **4.4.5.1 Alternative 1 (Less than Significant)**

The Cannabis Program would have a less-than-significant impact on transportation resources under Alternative 1 because site expansion at each of the 5 sites would be limited to 10,000 square feet of building area and no new cannabis uses would be allowed in the county. Thus, VMT impacts under Alternative 1 would be less than under Alternative 2. (*Less, eliminates a significant and unavoidable impact*).

#### **4.4.5.2 Alternative 3 (Significant and Unavoidable)**

As shown in Table 1.4, the development potential under Alternative 3 would be the same as under Alternative 2. Although commercial cannabis cultivation and noncultivation sites under Alternative 3 could potentially be screened out, there is a possibility that new cannabis facilities would not meet any of the screening criteria, and thus, their associated VMT output may exceed the allowable threshold identified by the County. This impact would be similar under Alternative 3 and Alternative 2. (*Similar*)

#### **4.4.5.3 Alternative 4 (Significant and Unavoidable)**

As shown in Table 1.4, the development potential under Alternative 4 would not include outdoor cultivation and would be greater for mixed-light and indoor cultivation than under Alternative 2. Although commercial cannabis cultivation and noncultivation sites under

Alternative 4 could potentially be screened out, there is a possibility that new cannabis facilities would not meet any of the screening criteria, and thus, their associated VMT output may exceed the allowable threshold identified by the County. This impact would be similar under Alternative 4 and Alternative 2. (*Similar*)

#### **4.4.5.4 *Alternative 5 (Significant and Unavoidable)***

As shown in Table 1.4, the development potential under Alternative 5 would be the same as under Alternative 2. Although commercial cannabis cultivation and noncultivation sites under Alternative 5 could potentially be screened out, there is a possibility that new cannabis facilities would not meet any of the screening criteria, and thus, their associated VMT output may exceed the allowable threshold identified by the County. This impact would be similar under Alternative 5 and Alternative 2. (*Similar*)

#### **4.4.6 Utilities and Service Systems, Issue 1: Adequate Water Supplies**

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 afy. The 2020 Urban Water Management Plans (UWMPs) concluded the Metropolitan Water District, the San Diego County Water Authority (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.

This impact would be significant and unavoidable under Alternative 2.

##### **4.4.6.1 *Alternative 1 (Less than Significant)***

No new cannabis uses would be allowed in the county under Alternative 1. The existing 5 sites could expand up to 10,000 square feet each. Assuming that these expansions would involve new indoor cannabis cultivation uses, the potential expansion of the 5 sites could result as much as 5.6 afy of total water demand. This increase in water demand would be less than significant. This would also be less than the water demand of Alternative 2 (668 afy). Thus, impacts on water demand under Alternative 1 would be less than under Alternative 2. (*Less, eliminates a significant and unavoidable impact*)

##### **4.4.6.2 *Alternative 3 (Significant and Unavoidable)***

Under Alternative 3, future new cannabis uses in the county are projected to demand the same quantity of water (668 afy). Thus, there would be similar effects related to municipal water supplies under Alternative 3 as under Alternative 2. (*Similar*)

#### **4.4.6.3 *Alternative 4 (Significant and Unavoidable)***

Under Alternative 4, future new cannabis uses in the county are projected to demand a smaller quantity of water (614 afy under Alternative 4 versus 668 afy under Alternative 2). Thus, there would be reduced effects related to municipal water supplies under Alternative 4 as under Alternative 2. (*Less*)

#### **4.4.6.4 *Alternative 5 (Significant and Unavoidable)***

Under Alternative 5, future new cannabis uses in the county are projected to demand the same quantity of water (668 afy). Thus, there would be similar effects related to municipal water supplies under Alternative 5 as under Alternative 2. (*Similar*)

### **4.5 Environmentally Superior Alternative**

The County is considering 5 alternatives to the Cannabis Program, including the No-Project Alternative. Alternatives 2, 3, 4, and 5 would involve the same 3 components of the Cannabis Program (Social Equity Program, Cannabis Ordinance amendments, and a cannabis licensing and permitting system). The program alternatives differ in regard to the definition and buffer distance from sensitive uses, allowed license types, and allowed maximum outdoor cultivation canopy. Alternatives 2, 3, 4, and 5 would comply with State Water Resources Control Board Cannabis Cultivation General Order (Order No. WQ 2023-0102-DWQ) and other state operation requirements for cannabis facilities siting and design. An evaluation of these alternatives against the existing conditions is presented in Chapter 2, "Significant Environmental Effects of the Proposed Project." Table 4.1, presented at the end of this section, summarizes the impact comparison to Alternative 2 (proposed project).

Under Alternative 1, the No-Project Alternative, the Cannabis Program would not be adopted. Alternative 1 would be the environmentally superior alternative because this alternative would reduce and avoid significant environmental impacts under Alternative 2. As discussed above, if the No-Project Alternative is the environmentally superior alternative, CEQA requires that the EIR "shall also identify an environmentally superior alternative among the other alternatives" (Section 15126.6(e)(2)). Of the remaining alternatives, Alternative 4 would eliminate significant impacts to odors associated with Alternative 2. In addition, Alternative 4 would reduce the severity of significant and unavoidable impacts related to hydrology and water quality and water supply compared to Alternative 2. Therefore, Alternative 4 is the environmentally superior alternative.

**Table 4.1 Summary of the Environmental Effects of the Alternatives Relative to Those of the Proposed Project**

<b>Environmental Topic</b>	<b>Alternative 2: Proposed Project—Cannabis Program Consistent with State Requirements</b>	<b>Alternative 1: No Project—Retention of Current Cannabis Regulations</b>	<b>Alternative 3: Cannabis Program with Expanded County Regulations</b>	<b>Alternative 4: Cannabis Program with Outdoor Cannabis Cultivation Prohibition</b>	<b>Alternative 5: Cannabis Program with Maximum 1 Acre of Outdoor Cannabis Cultivation Canopy</b>
Aesthetics	Significant and unavoidable	Less (LTS, eliminates SU impact)	Similar	Less	Similar
Agriculture and Forest Resources	No impact	Similar (NI)	Similar (NI)	Similar (NI)	Similar (NI)
Air Quality	Significant and unavoidable (odor impacts only)	Less (LTS, eliminates SU impact)	Less	Less (LTS, eliminates SU impact)	Less
Biological Resources	Less than significant (with mitigation)	Less	Similar	Less	Similar
Cultural and Paleontological Resources	Less than significant	Less	Similar	Less	Similar
Energy	Less than significant (with mitigation)	Less	Similar	Less	Similar
Geology, Soils, and Mineral Resources	Less than significant	Less	Similar	Less	Similar
Greenhouse Gas Emissions and Climate Change	Less than significant (with mitigation)	Less	Similar	Less	Similar
Hazards and Hazardous Materials	Less than significant	Less	Similar	Less	Similar
Hydrology and Water Quality	Significant and unavoidable (groundwater supply impacts only)	Less (LTS, eliminates SU impact)	Similar	Less	Similar
Land Use and Planning	Less than significant	Less (NI)	Similar	Similar	Similar
Noise	Significant and unavoidable (construction noise impacts only)	Less (LTS, eliminates SU impact)	Similar	Similar	Similar
Population, and Housing	Less than significant	Less	Similar	Similar	Similar
Public Services	Less than significant	Less (NI)	Similar	Similar	Similar

<b>Environmental Topic</b>	<b>Alternative 2: Proposed Project—Cannabis Program Consistent with State Requirements</b>	<b>Alternative 1: No Project—Retention of Current Cannabis Regulations</b>	<b>Alternative 3: Cannabis Program with Expanded County Regulations</b>	<b>Alternative 4: Cannabis Program with Outdoor Cannabis Cultivation Prohibition</b>	<b>Alternative 5: Cannabis Program with Maximum 1 Acre of Outdoor Cannabis Cultivation Canopy</b>
Transportation	Significant and unavoidable (vehicle miles traveled impacts only)	Less (LTS, eliminates SU impact)	Similar	Similar	Similar
Tribal Cultural Resources	Less than significant	Less	Similar	Less	Similar
Utilities and Service Systems	Significant and unavoidable (water supply impacts only)	Less (LTS, eliminates SU impact)	Similar	Less	Similar
Wildfire	Less than significant	Less	Similar	Less	Similar

Notes: NI = no impact; LTS = less than significant; SU = significant and unavoidable.

Source: Compiled by Ascent in 2024.