

ES-1 Introduction

The purpose of the Executive Summary and impact summary table is to provide the reader with a brief overview of the Commercial Cannabis Cultivation and Manufacturing Regulations and Licensing Program (Program) proposed by the County of Santa Cruz (County). The County Planning Department, as lead agency under the California Environmental Quality Act (CEQA), has prepared this Environmental Impact Report (EIR) in accordance with CEQA, Public Resources Code (PRC) Sections 21000 et seq., the State of California CEQA Guidelines, California Code of Regulations (CCR), and Title 14, Sections 15000 et seq. to address the potential environmental impacts of the Program, including two regulatory scenarios: the Project and the More Permissive Project, as further described herein.

This EIR is an informational document that may be used by the public and governmental agencies to review and consider the environmental effects of the Program as part of its decision-making process. The reader should not rely exclusively on the Executive Summary as the sole basis for judgment of the Program and its alternatives. The complete EIR should be consulted for specific information about the environmental effects and the implementation of required mitigation measures, consistent with CEQA.

This EIR can be characterized as a Program EIR prepared pursuant to §15168 of the state CEQA Guidelines. As a Program EIR, the level of detail included in the project description and methodology for impact analysis is relatively more general than a project-level EIR, as individual cultivation or manufacturing site-level details are not available for current license applications or would be considered too speculative for evaluation. This approach allows the County Board of Supervisors to consider broad implications and impacts associated with the Program while not requiring a detailed evaluation of individual properties. Methods to analyze the Program's environmental effects consider cumulative cannabis cultivation and manufacturing site development under the Program, or a reasonable worst-case scenario for a particular resource area (see also, Section 3.0, *Introduction and Approach to Analysis*). This EIR may be incorporated by reference in subsequent CEQA review documents to describe regional influences, secondary effects, cumulative impacts, and other broad factors that apply to the Program as a whole.

ES-2 Program Overview

Consistent with state law, the proposed Program would regulate commercial cannabis cultivation and cannabis product manufacturing within unincorporated areas of the County to balance the diverse demands for cannabis products with the health, safety, and welfare of the community, and address the range of demands on County services and adverse effects on the environment and local community. The Program would regulate how, where, and how much cannabis and cannabis products may be commercially cultivated and manufactured to provide a reliable and high quality supply, while also protecting the environment and neighborhood quality.

This EIR reviews potential environmental impacts of the repeal of Chapters 7.126 and 7.128 of the Santa Cruz County Code (SCCC), adoption of a new SCCC Chapter 7.128 regarding licensing of commercial cultivation of cannabis, and adoption of a new SCCC Chapter 7.132 regarding licensing of

cannabis product manufacturing. Associated County zoning ordinance updates and General Plan amendments to support the Program would also be adopted (Appendix C).

To address commercial cannabis cultivation, the Program would apply to all cultivation sites within unincorporated County areas zoned Residential Agriculture (RA), Special Use (SU), Timber Production (TP), Agriculture (A), Commercial Agriculture (CA), Community Commercial (C-4), and Industrial (M-1, M-2, M-3). The Program also includes required setbacks for cannabis cultivation from sensitive areas and uses (e.g., schools, creeks) and prohibitions, based on the license type. This EIR evaluates two Program scenarios for cultivation regulation: the “Project” and the “More Permissive Project”. The specific development standards differ between the Project and the More Permissive Project, with the More Permissive Project allowing a greater potential area to be cultivated in the County. Further, cultivation would be excluded on land zoned RA, SU, and TP within an area defined by the Coastal Zone + 1 mile buffer inland under the Project scenario. The Project scenario would also not permit outdoor cultivation in the Second Supervisorial District. For details, see Chapter 2, *Project Description*.

To address commercial cannabis product manufacturing, the Program would license manufacturing in areas zoned RA, SU, TP, A, CA, C-4, M-1, M-2, M-3, and Community Commercial (C-2; only in conjunction with a licensed dispensary); small-scale cannabis manufacture home occupations would be allowed in association with detached single-family dwellings in residential, commercial, agricultural, industrial, timber production, and special use zoning districts. Manufacturing under both the Project and the More Permissive Project scenarios would be subject to restrictions based upon the materials and processes associated with the manufacturing activity, with limits on where certain types of manufacturing may locate. Notably, use of high pressure or other more hazardous processes and materials would not be allowed for cannabis home occupation businesses, which would also need to be a minor ancillary use of a detached single-family home. For details, see Chapter 2, *Project Description*.

ES-3 Summary of Program Objectives

The state CEQA Guidelines require that the EIR project description include a statement of the objectives of the proposed Program. The primary objectives of the Program are to:

1. Regulate commercial cannabis cultivation and manufacturing of cannabis products within Santa Cruz County in a manner consistent with state law, and allow the orderly development and oversight of commercial cannabis cultivation and manufacturing businesses within the County;
2. Develop a program that encourages cannabis cultivators and cannabis product manufacturers to operate legally and secure a license to operate in full compliance with County regulations, maximizing the proportion of activities within the program and minimizing unlicensed activities;
3. Provide efficiency, and clarity in the commercial cannabis cultivation and manufacturing licensing and permit process, regulations, and standards to facilitate participation and use by applicants;
4. Prevent impacts of cannabis cultivation and manufacturing sites on children and sensitive populations;

5. Encourage the cultivation and manufacturing of high quality local cannabis products that meet the demand, including the needs of medical patients and their caregivers, as well as adult personal use as authorized under Proposition 64;
6. Develop a legal, local cannabis industry to improve the County's tax base in balance with other objectives;
7. Ensure compatibility of commercial cannabis cultivation and manufacturing sites with surrounding land uses, including residential neighborhoods, educational facilities, agriculture operations, and timber production;
8. Minimize adverse effects of commercial cannabis cultivation and manufacturing on the natural environment, natural resources and wildlife, including riparian corridors, wetlands and sensitive habitats, as well as effects on water supply, water quality and instream flows;
9. Regulate sites and premises used for commercial cannabis cultivation and manufacturing to avoid the risks of criminal activity, degradation of the visual setting and neighborhood character, obnoxious odors, hazardous materials, and fire hazards;
10. Ensure cannabis is cultivated and manufactured into products in a manner that supports public health and safety;
11. Ensure adequate law enforcement and fire protection response to commercial cannabis cultivation and manufacturing sites; and
12. Promote energy and resource efficiency in cannabis cultivation and manufacturing of cannabis products.

Both the Project and the More Permissive Project meet the Program objectives described above; however, they differ in the degree to which they meet each individual Program objective and balance competing priorities among allowable cultivation and manufacturing locations and intensities. Each scenario also differs in the type, nature and degree of resulting environmental impacts. Under the More Permissive Project, the County could potentially accommodate larger and more numerous commercial cannabis cultivation sites, which would increase the number of properties within the County that would be eligible for a license to operate consistent with County regulations.

ES-4 Scope of the Environmental Impact Report

The scope of this EIR is based on the project description outlined in Chapter 2, *Project Description* and the Notice of Preparation (NOP) (Appendix B), focusing review on environmental resources that could result in potentially significant impacts on environmental resources. Chapter 3, *Environmental Impact Analysis* identifies 14 resources related to the Program, which were determined to be subject to potentially significant impacts in the NOP scoping process, and these are addressed in the following sections:

- Section 3.1, "Aesthetics and Visual Resources"
- Section 3.2, "Agricultural and Timber Resources"
- Section 3.3, "Air Quality"
- Section 3.4, "Biological Resources"
- Section 3.5, "Cultural Resources"
- Section 3.6, "Geology and Soils"
- Section 3.7, "Greenhouse Gas Emissions and Climate Change"
- Section 3.8, "Hazards and Hazardous Materials"
- Section 3.9, "Hydrology and Water Quality"
- Section 3.10, "Land Use and Planning"
- Section 3.11, "Public Services"
- Section 3.12, "Population, Employment, and Housing"
- Section 3.13, "Transportation and Circulation"
- Section 3.14, "Utilities and Energy Conservation"

Sections 3.1 through 3.14 provide detailed discussions of the environmental baseline or setting, methodology for impact assessment for the resource, impacts associated with the Project and More Permissive Project, and mitigation measures designed to reduce significant impacts where required and when feasible. The residual impacts following the implementation of any mitigation measures and secondary and cumulative impacts also are discussed.

Additionally, Section 3.15, *Other CEQA Issues*, identifies other resource areas that were found to have no significant effect on the environment (i.e., Noise, and Minerals) and provides a brief discussion of why they were not analyzed as primary environmental resources areas in this EIR. Section 3.15 also addresses growth inducing and significant, irreversible effects of the Program.

This EIR examines potential direct, indirect, secondary, and cumulative impacts of the Program. These impacts were determined through a rigorous process mandated by CEQA in which existing conditions are compared and contrasted with conditions that would exist once the Program is implemented. The significance of each identified impact was determined using either CEQA thresholds informed by local thresholds of significance. The following categories are used for classifying Program-related impacts.

- **Significant and Unavoidable:** Significant impacts that cannot be feasibly mitigated or avoided. No measures could be taken to avoid or reduce these adverse effects to achieve insignificant or negligible levels. Even after application of feasible mitigation measures, the residual impact would be significant. If the Program is approved with significant and unavoidable impacts, decision-makers are required to adopt a Statement of Overriding Considerations pursuant to CEQA Section 15093 explaining why benefits of the Program outweigh the potential damage caused by these significant unavoidable impacts.
- **Less than Significant with Mitigation:** Such impacts can be reduced to a less than significant level with feasible mitigation, which can include incorporating changes to the Program. If the proposed Program is approved with significant but mitigable impacts, decision-makers are required to make findings pursuant to CEQA Section 15091, stating that impacts have been mitigated to the maximum extent feasible and the residual impact would not be significant.
- **Less than Significant:** These adverse but less than significant impacts do not require mitigation, nor do they require findings be made. Mitigation measures may be recommended to further reduce environmental effects and/or improve consistency with policies in the Santa Cruz County General Plan and regulations of the SCCC.
- **Beneficial:** Effects that are beneficial to the environment.

For each significant impact identified, mitigation to reduce impacts to less than significant levels are identified. In those instances where mitigation measures cannot reduce such impacts to less than significant levels, the impacts are identified as *significant and unavoidable*.

The EIR also presents alternatives to the Program, which include the No Project Alternative, the Most Restrictive Alternative, and the Most Permissive Alternative, and a comparative assessment of the impacts that would be associated with the implementation of each compared to the Program.

ES-5 Notice of Preparation

The contents of this EIR were established based on the findings in the Notice of Preparation (NOP) and attached materials, as well as public and agency input during the scoping period. The County issued an NOP on February 13, 2017 to request comments on the scope of the EIR. The NOP was published online at www.sccoplanning.com and circulated to relevant agencies, community organizations, and interested individuals in the County. A public scoping workshop was held on February 28, 2017; a 30-day public comments period closed March 15, 2017 (CEQA Guidelines §15082). A copy of the NOP and comments received during the NOP review period are included in Appendix B.

ES-6 Notice of Completion

In accordance with Section 15085 of the state CEQA Guidelines, the Notice of Completion (NOC) was prepared and distributed to responsible and affected agencies and other interested parties for a 45-day public review along with the Draft EIR. The public review period for the NOC and Draft EIR began on August 31, 2017, and ended on October 16, 2017. The NOC was also posted in the Santa Cruz County Clerk's office and sent to the State Clearinghouse at the Governor's Office of Planning and Research to solicit statewide agency review and comment of the Draft EIR.

ES-7 Summary of Program Impacts

The significance of each impact resulting from implementation of the Program has been determined according to CEQA thresholds and local standards. Table ES-1 presents a summary of the impacts, mitigation measures, and residual impacts from implementation of the Program.

Based on the analysis presented in this EIR, implementation of the proposed Program would create significant and unavoidable direct or indirect impacts to air quality and transportation. The Program could increase the number of vehicle trips due to new employees, which would cause NO_x levels to exceed the applicable air quality thresholds. Since the County is currently in nonattainment for ozone, and NO_x is an ozone precursor, the Program's exceedance of the NO_x threshold makes this impact significant. Currently, there are no feasible mitigation measures that are available to reduce these impacts, so the impacts would be *significant and unavoidable*. See Section 3.3, *Air Quality*, for more detailed information. Additionally, increased vehicle trips associated with the Program would adversely affect level of service (LOS) roads, intersections, and highway segments within the urban, and some rural areas, of the County. Fee payment mitigation would not fully alleviate these impacts to a less than significant level because revenue sources would not be enough to improve each of these congested intersections, roads, and highways to acceptable levels of service. Therefore, even with mitigation, direct impacts would be *significant and unavoidable*. See Section 3.13, *Transportation and Circulation*.

Further, this EIR programmatically analyzes the secondary impacts of the Program on changing and expanding unregulated and unlicensed cannabis cultivation and manufacturing in the County. Secondary impacts of the Program would create significant and unavoidable impacts to all resource areas analyzed in Chapter 3, *Environmental Impact Analysis*, except for aesthetics and visual resources, which would have less than significant secondary impacts. This is because it is not possible for the County to completely eradicate all unregulated cannabis activity. These illegal activities would not necessarily adhere to existing County regulators and/or mitigation measures in this EIR, and could therefore cause significant adverse impacts due to practices such as not following grading restrictions and causing erosion, using chemicals hazardous to biological resources, diverting streams and causing water supply and quality issues, and using diesel generators that contribute to air pollution and GHGs. Although this EIR introduces mitigation measures that would lessen these impacts through enforcement and surveys of unlicensed cannabis activities, as it is not possible to bring all unregulated cannabis activity into compliance with the Program, secondary impacts remain *significant and unavoidable*.

The reasons why the Program is being proposed, notwithstanding the significant impacts, are related to the Program objectives stated above in ES-1, *Summary of Program Objectives* and in Section 2.3.1, *Program Objectives*. As indicated, the Program is being proposed to regulate commercial cannabis cultivation and manufacturing of cannabis products within the County in a manner consistent with state law and encourages cultivators and manufacturers to operate legally and secure a license to operate in full compliance with County regulations, meet the local demand of cannabis products, improve the County's tax base, and prevent impacts of cannabis activities on children, sensitive populations, the natural environment, and public health and safety.

ES-8 Summary of Cumulative Impacts

"Cumulative Impacts," (CEQA Guidelines Section 15130) describes impacts that could occur from the combined effect of other past, present, and reasonably foreseeable future projects. For each significant adverse impact identified, mitigation measures are presented where feasible to reduce the impacts to acceptable levels. Cumulative impacts were determined to be *less than significant* for aesthetic and visual resources; agriculture and timber resources; air quality construction-related effects; cultural resources; geology and soils; hazards and hazardous materials; hydrology and water quality; land use; population and housing; public services; transportation and circulation; and utilities and energy conservation. Cumulative impacts for biological resources would also be less than significant, but would be subject to recommended mitigation to address Countywide rodenticide use and management. Cumulative impacts were determined to be considerable and *therefore significant and unavoidable* for air quality operational effects and cumulative traffic impacts (see Section 3.3, *Air Quality*, Section 3.13, *Transportation and Circulation*, and Section 3.15, *Other CEQA Issues*).

ES-9 Environmentally Superior Alternative

In addition to the More Permissive Project scenario addressed at a coequal level of detail in the main analysis in Section 3.0 of this EIR, alternatives selected for analysis include:

- No Project Alternative
- Alternative 1 — Most Restrictive Alternative

- Alternative 2 — Most Permissive Alternative

Each alternative analyzed in Chapter 4, *Alternatives* was evaluated based on significance criteria, location, extent and magnitude of impacts, potential benefits, and relative impacts in comparison to other alternatives and Program scenarios. The alternative with the fewest adverse impacts and relatively greatest benefits is thereby considered the Environmentally Superior Alternative.

All alternatives would result in significant impacts to air quality and transportation and circulation, and none of the alternatives analyzed would reduce this significant impact to a less than significant level. The Project, More Permissive Project, Alternative 1, and Alternative 2 all contain fewer significant impacts than the No Project Alternative. As such, the No Project Alternative is eliminated from consideration for the Environmentally Superior Alternative. Alternative 1 is also eliminated from consideration for the Environmentally Superior Alternative as it does not meet a vast majority of Project objectives.

Based on the information in this EIR, the Most Permissive Project Alternative is identified as the Environmentally Superior Alternative. Alternative 2 was found to generate the least adverse impacts, with the potential to substantially improve natural resources and public service conditions associated with secondary impacts, while achieving the most Program objectives. The Most Permissive Project Alternative would give the County the most flexibility and opportunity to bring cannabis operations into compliance with the SCCC and the County General Plan and monitor operations over time. It also provides the greatest opportunity to mitigate impacts and increase County tax revenue to support ongoing improvement and enforcement programs. With implementation of mitigation measures, the Most Permissive Project Alternative provides a balance between meeting Program objectives, including quality of life concerns, while addressing environmental impacts by maximizing participation in the Program and, in doing so, applying SCCC regulations, County policies, and required mitigation measures from this EIR to all licensed cannabis cultivation and manufacturing. The Most Permissive Alternative minimizes the barriers to participation in the Program and would reduce secondary effects of unregulated cannabis activities, which are consistently the more severe and environmentally damaging significant and unavoidable impacts identified by the analysis.

Given the nature of unregulated cannabis activities that current existing and may occur within the County, secondary impacts, with the exception of aesthetics and visual resources, are considered to result in significant and unavoidable effects on the human and natural environment due to the inability to effectively enforce and regulate such unlicensed operations. Due to the potential for operators to continue to engage in such activities within the County, either due to costs of licensing, associated costs of development, or other reasons, significant and unavoidable secondary impacts are considered to continue to occur, regardless of the Program scenario (see Table 4-6). However, the Most Permissive Project Alternative would reduce these impacts to the greatest degree compared to all other Program scenarios and alternatives considered. See Chapter 4, *Alternatives* for complete details.

Table ES-1. Summary of Impacts, Mitigation, and Residual Impacts		
Impact	Mitigation Measure	Residual Significance
Aesthetics and Visual Resources		
Impact AV-1. Commercial cannabis cultivation under the Program would have adverse effects on scenic resources and vistas, existing visual character, and effects from nighttime lighting and glare. With mitigation, this impact would be less than significant.	<i>Direct:</i> MM AV-1.1 would apply. <i>Indirect:</i> MM AV-1.2, MM LU-1.1-4, and MM LU-1.1-5 would apply.	<i>Direct:</i> Less than Significant with Mitigation <i>Indirect:</i> Less than Significant with Mitigation
Impact AV-2. Cannabis product manufacturing under the Program would have adverse effects on scenic vistas, existing visual character, and effects from nighttime lighting and glare. This impact would be less than significant with mitigation.	<i>Direct:</i> No mitigation required. <i>Indirect:</i> MM AV-1.2, MM LU-1.1-4, and MM LU-1.1.5 would apply.	<i>Direct:</i> Less than Significant <i>Indirect:</i> Less than Significant with Mitigation
Secondary Impact AV-3. Unlicensed cannabis activities could have adverse effects on scenic resources and vistas, existing visual character, and effects from nighttime lighting and glare, but the effects would be less than significant.	No mitigation required	Less than Significant
Agricultural and Timber Resources		
Impact AT-1. The Program could convert prime farmland, unique farmland, or farmland of statewide importance to non-agricultural use. Impacts would be less than significant.	<i>Direct:</i> No mitigation required. <i>Indirect:</i> No mitigation required.	<i>Direct:</i> Less than Significant <i>Indirect:</i> Less than Significant
Impact AT-2. Proposed land uses under the Program could be incompatible with existing zoning for agricultural uses and Williamson Act contracts. Impacts would be less than significant.	<i>Direct:</i> No mitigation required. <i>Indirect:</i> No mitigation required.	<i>Direct:</i> Less than Significant <i>Indirect:</i> Less than Significant
Impact AT-3. The Program could substantially conflict with existing zoning for or cause rezoning of forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by PRC section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)) to a non-allowable use. Impacts would be less than significant.	<i>Direct:</i> No mitigation required. <i>Indirect:</i> No mitigation required.	<i>Direct:</i> Less than Significant <i>Indirect:</i> Less than Significant
Impact AT-4. The Program could result in the removal of trees and conversion of timberland that may be used for timberland resources. Impacts would be less than significant with mitigation.	<i>Direct:</i> MM AT-4.1a and MM AT-4.1.b would apply. <i>Indirect:</i> No Mitigation required.	<i>Direct:</i> Less than Significant with Mitigation <i>Indirect:</i> Less than Significant
Secondary Impact AT-5. The Program could convert prime farmland, unique farmland, or farmland of statewide importance to	MM AT-1.3a and MM AT-1.3b would apply.	Impacts would be Significant and Unavoidable

Table ES-1. Summary of Impacts, Mitigation, and Residual Impacts		
Impact	Mitigation Measure	Residual Significance
non-agricultural use; propose land uses that are incompatible with existing zoning for agricultural uses and Williamson Act contracts; substantially conflict with existing zoning for or cause rezoning of forest land, timberland, or timberland zoned TP to a non-allowable use; and result in the removal of trees and conversion of timberland that may be used for timberland resources. Impacts would be significant and unavoidable.		
Air Quality		
Impact AQ-1. Commercial cannabis cultivation and manufacturing under the Program could potentially expose sensitive receptors to substantial pollutant concentrations and create objectionable odors affecting a substantial number of people. Impacts would be less than significant with mitigation.	<i>Direct:</i> MM AQ-1.1, MM AQ-1.2, MM AQ-1.3, MM AQ-1.4, and MM AQ-1.5 would apply. <i>Indirect:</i> No mitigation required.	<i>Direct:</i> Less than Significant with Mitigation <i>Indirect:</i> Less than Significant
Impact AQ-2. Commercial cannabis cultivation and manufacturing under the Program could be potentially inconsistent with the MBUAPCD AQMP. Impacts would be significant and unavoidable.	<i>Direct:</i> MM AQ-2.1 would apply. <i>Indirect:</i> No mitigation required.	<i>Direct:</i> Significant and Unavoidable <i>Indirect:</i> Less than Significant
Impact AQ-3. Commercial cannabis cultivation and manufacturing under the Program could potentially violate an air quality standard or contribute to an air quality violation, and result in a cumulatively considerable net increase of a criteria pollutant for which the County is in nonattainment. Impacts would be significant and unavoidable.	<i>Direct:</i> MM AQ-2.1 would apply. <i>Indirect:</i> No mitigation required.	<i>Direct:</i> Significant and Unavoidable <i>Indirect:</i> Less than Significant
Secondary Impact AQ-4. New or increased unregulated commercial cannabis cultivation and cannabis product manufacturing under the Program could potentially expose sensitive receptors to substantial pollutant concentrations and create objectionable odors affecting a substantial number of people, be potentially inconsistent with the MBUAPCD AQMP, and potentially violate an air quality standard or contribute to an air quality violation, and result in a cumulatively considerable net increase of a criteria pollutant for which the County is in nonattainment. Impacts would be significant and unavoidable.	MM AT-1.3a, MM AT-1.3b, and MM AQ-1.3 would apply.	Impacts would be Significant and Unavoidable

Table ES-1. Summary of Impacts, Mitigation, and Residual Impacts		
Impact	Mitigation Measure	Residual Significance
Biological Resources		
Impact BIO-1. Commercial cannabis cultivation and cannabis product manufacturing under the Program could have adverse effects on unique, rare, threatened, or endangered plant or wildlife species. Impacts would be less than significant with mitigation.	<i>Direct:</i> MM HYDRO--1.1, MM BIO-1.1a, MM BIO-1.1b, MM BIO-1.1c, MM BIO-1.1d, MM BIO-1.1e, MM BIO-1.1f, MM BIO-1.1g, and MM BIO-1.1h would apply. <i>Indirect:</i> MM BIO-1.1a, MM BIO-1.1b, MM BIO-1.1c, MM BIO-1.1d, MM BIO-1.1e, MM BIO-1.1f, MM BIO-1.1h, and MM HYDRO-2.3 would apply.	<i>Direct:</i> Less than Significant with Mitigation <i>Indirect:</i> Less than Significant with Mitigation
Impact BIO-2. Commercial cannabis cultivation and cannabis product manufacturing under the Program could have adverse effects on habitats or sensitive natural communities. Impacts would be less than significant with mitigation.	<i>Direct:</i> MM BIO-2.1a, MM BIO-2.1b, and MM BIO-2.1c would apply. <i>Indirect:</i> MM BIO-1.1d, MM BIO-2.1a, MM BIO-2.1b, MM BIO-2.1c, and MM HYDRO-2.3 would apply.	<i>Direct:</i> Less than Significant with Mitigation <i>Indirect:</i> Less than Significant with Mitigation
Impact BIO-3. Commercial cannabis cultivation and cannabis product manufacturing under the Program could have adverse effects on the movement of any native resident or migratory species. Impacts would be less than significant with mitigation.	<i>Direct:</i> MM AV-1.1, MM BIO-3.1, and MM BIO-1.1h would apply. <i>Indirect:</i> No mitigation required.	<i>Direct:</i> Less than Significant with Mitigation <i>Indirect:</i> Less than Significant
Impact BIO-4: Commercial cannabis cultivation and cannabis product manufacturing under the Program may conflict with adopted local plans, policies, or ordinances oriented towards the protection and conservation of biological resources. Impacts would be less than significant with mitigation.	<i>Direct:</i> MM BIO-4.1 and MM BIO-4.2 would apply. <i>Indirect:</i> MM BIO-4.1 and MM BIO-4.2 would apply.	<i>Direct:</i> Less than Significant with Mitigation <i>Indirect:</i> Less than Significant with Mitigation
Secondary Impact BIO-5. Unregulated commercial cannabis cultivation and cannabis product manufacturing under the Program could have adverse effects on unique, rare, threatened, or endangered plant or wildlife species; habitats or sensitive natural communities; the movement of any native resident or migratory species; or may conflict with adopted local plans, policies, or ordinances oriented towards the protection and conservation of biological resources. Impacts would be significant and unavoidable.	MM AT-1.3a and MM AT-1.3b would apply.	Impacts would be Significant and Unavoidable

Table ES-1. Summary of Impacts, Mitigation, and Residual Impacts		
Impact	Mitigation Measure	Residual Significance
Cumulative impacts to Biological Resources	Recommended MM BIO-5.1 would apply	Less than Significant with Mitigation
Cultural Resources		
Impact CR-1. Commercial cannabis cultivation and cannabis product manufacturing under the Program that occur in or near properties which may be historically significant but are not on the County's Historic Resources Inventory could potentially cause physical demolition, destruction, relocation, or alteration of historical resources. Impacts would be less than significant with mitigation.	<i>Direct:</i> MM CR-1.1 would apply. <i>Indirect:</i> MM CR-1.1 would apply.	<i>Direct:</i> Less than Significant with Mitigation <i>Indirect:</i> Less than Significant with Mitigation
Impact CR-2. Commercial cannabis cultivation and cannabis product manufacturing under the Program could potentially cause disruption, alteration, destruction, or adverse effects on archaeological resources, tribal cultural resources, human remains, or paleontological resources. Impacts would be less than significant.	No mitigation required	<i>Direct:</i> Less than Significant <i>Indirect:</i> Less than Significant
Secondary CR-3. Unregulated commercial cannabis cultivation and cannabis product manufacturing under the Program could potentially cause adverse effects on historical resources, archaeological resources, tribal cultural resources, human remains, or paleontological resources. Impacts would be significant and unavoidable.	MM AT-1.3a and MM AT-1.3b would apply.	Impacts would be Significant and Unavoidable
Geology and Soils		
Impact GEO-1. Commercial cannabis cultivation under the Program could have adverse effects due to exposure to unstable earth conditions, such as landslides, erosion, earthquakes, liquefaction, expansive soils, ground failure, or other geologic hazards. This impact would be less than significant with mitigation.	<i>Direct:</i> No mitigation required. <i>Indirect:</i> MM LU-1.1.4 and MM LU 1.1.5 would apply.	<i>Direct:</i> Less than Significant <i>Indirect:</i> Less than Significant with Mitigation
Impact GEO-2. Cannabis product manufacturing under the Program could have adverse effects from exposure to unstable earth conditions such as landslides, soil erosion, earthquakes, liquefaction, expansive soils, ground failure, or other geologic hazards. This impact would be less than significant.	<i>Direct:</i> No mitigation required. <i>Indirect:</i> No mitigation required.	<i>Direct:</i> Less than Significant <i>Indirect:</i> Less than Significant
Secondary Impact GEO-3. Unregulated commercial cannabis cultivation and	MM AT-1.3a and MM AT-1.3b would apply.	Impacts would be Significant and Unavoidable

Table ES-1. Summary of Impacts, Mitigation, and Residual Impacts		
Impact	Mitigation Measure	Residual Significance
cannabis product manufacturing under the Program could potentially have adverse effects from exposure of persons and structures to unstable earth conditions such as landslides, erosion, earthquakes, liquefaction, expansive soils, ground failure, or other geologic hazards. This impact would be significant and unavoidable.		
Greenhouse Gas Emissions and Climate Change		
Impact GHG-1.1. Commercial cannabis cultivation and manufacturing under the Program could potentially generate significant levels of GHG emissions and be inconsistent with the County of Santa Cruz Climate Action Strategy. Impacts would be less than significant with mitigation.	<i>Direct and Indirect:</i> MM LU-1.1.6, MM GHG-1.1, and MM GHG-1.2 would apply.	<i>Direct and Indirect:</i> Less than Significant with Mitigation
Secondary Impact GHG-2. New or increased unregulated commercial cannabis cultivation and cannabis product manufacturing under the Program could potentially generate significant levels of GHG emissions and be inconsistent with the County of Santa Cruz Climate Action Strategy. Impacts would be significant and unavoidable.	MM AT-1.3a and MM AT-1.3b would apply.	Impacts would be Significant and Unavoidable
Hazards and Hazardous Materials		
Impact HAZ-1. Construction and operation of commercial cannabis cultivation sites could create impacts through the routine transport, use, or disposal of hazardous materials and the accidental release of such materials with potential for exposure of the public. Impacts would be less than significant.	<i>Direct:</i> No mitigation required. <i>Indirect:</i> No mitigation required.	<i>Direct:</i> Less than Significant <i>Indirect:</i> Less than Significant
Impact HAZ-2. Construction and operation of commercial cannabis product manufacturing could increase the risk of release and exposure to hazards and hazardous materials. Impacts would be less than significant.	<i>Direct:</i> No mitigation required. <i>Indirect:</i> No mitigation required.	<i>Direct:</i> Less than Significant <i>Indirect:</i> Less than Significant
Impact HAZ-3. Cannabis cultivation and manufacturing may be located within high fire hazard areas, exposing people or structures to significant risks involving wildland fires, along the wildland-urban interface, where uses are located in wildlands or through interference with emergency evacuations. Impacts would be less than significant with mitigation.	<i>Direct:</i> No mitigation required. <i>Indirect:</i> No mitigation required.	<i>Direct:</i> Less than Significant <i>Indirect:</i> Less than Significant

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Impact	Mitigation Measure	Residual Significance
Secondary Impact HAZ-4. Unregulated cannabis cultivation and manufacturing may use, transport, or store hazardous materials, expose or release hazards, or be located within high fire hazard areas, exposing people or structures to significant risks involving wildland fires. Impacts would be significant and unavoidable, exposing people or structures to significant risks involving wildland fires.	MM AT-1.3a and MM AT-1.3b would apply.	Impacts would be Significant and Unavoidable
Hydrology and Water Quality		
Impact HYDRO-1. Commercial cannabis cultivation under the Program could introduce sediment and other pollutants to surface flows and groundwater, which would cause water resource contamination. With mitigation, this impact would be less than significant.	<i>Direct:</i> MM HYDRO-1.1, MM HYDRO-1.2, and MM HYDRO-1.3 would apply. <i>Indirect:</i> MM LU-1.1.4 and MM LU-1.1.5 would apply.	<i>Direct:</i> Less than Significant with Mitigation <i>Indirect:</i> Less than Significant with Mitigation
Impact HYDRO-2. Commercial cannabis cultivation under the Program could adversely affect groundwater supplies and groundwater recharge. This impact would be less than significant with mitigation.	<i>Direct:</i> MM HYDRO-2.1, and MM HYDRO-2.2 would apply. <i>Indirect:</i> MM HYDRO-2.3 would apply.	<i>Direct:</i> Less than Significant with Mitigation <i>Indirect:</i> Less than Significant with Mitigation
Impact HYDRO-3. Commercial cannabis cultivation under the Program would have a less than significant effect on existing drainage patterns, including the alteration of the course of a stream or river and the potential to place people or structures in areas of inundation or mudflows, including 100-year floodplains.	<i>Direct:</i> No mitigation required. <i>Indirect:</i> No mitigation required.	<i>Direct:</i> Less than Significant <i>Indirect:</i> Less than Significant
Impact HYDRO-4. Commercial cannabis manufacturing under the Program would result in a less than significant effect with mitigation on the introduction of sediment and other pollutants to surface flows and groundwater, and on the groundwater supplies and groundwater recharge.	<i>Direct:</i> No mitigation required. <i>Indirect:</i> No mitigation required.	<i>Direct:</i> Less than Significant <i>Indirect:</i> Less than Significant
Impact HYDRO-5. Commercial cannabis manufacturing under the Project would have a less than significant effect on existing drainage patterns, including the alteration of the course of a stream or river and the potential to place people or structures in areas of inundation or mudflows, including 100-year floodplains.	<i>Direct:</i> No mitigation required. <i>Indirect:</i> No mitigation required.	<i>Direct:</i> Less than Significant <i>Indirect:</i> Less than Significant
Secondary Impact HYDRO-6. Unregulated commercial cannabis cultivation and cannabis product manufacturing under the Program could potentially introduce	MM AT-1.3a and MM AT-1.3b would apply.	Impacts would be Significant and Unavoidable

Table ES-1. Summary of Impacts, Mitigation, and Residual Impacts		
Impact	Mitigation Measure	Residual Significance
pollutants or sediment into surface flows and groundwater, reduce groundwater supplies and recharge, alter existing drainage patterns, or place people or structures in areas of inundation or mudflows. This is a significant and unavoidable impact.		
Land Use		
Impact LU-1. Commercial cannabis cultivation and manufacturing under the Program would potentially conflict with an applicable land use plan, policy, or regulation. Impacts would be less than significant with mitigation.	<i>Direct and Indirect:</i> MM BIO-3.2, MM LU-1.1.1, MM LU-1.1.2, MM LU-1.1.3, MM LU-1.1.4, MM LU-1.1.5, and MM LU-1.1.6 would apply.	<i>Direct and Indirect:</i> Less than significant with mitigation
Impact LU-2. Commercial cannabis cultivation and manufacturing under the Program could cause adverse effects to existing communities due to increases in traffic, odors, noise, or other quality of life issues. Impacts would be less than significant.	<i>Direct and Indirect:</i> No Mitigation Required	<i>Direct and Indirect:</i> Less than Significant
Secondary Impact LU-3. Commercial cannabis cultivation and manufacturing under the Program would potentially conflict with an applicable land use plan, policy, or regulation, an adopted habitat conservation plan in the County, or cause adverse effects on existing communities. Impacts would be significant and unavoidable.	MM AT-1.3a and MM AT-1.3b would apply.	Impacts would be Significant and Unavoidable
Public Services and Utilities		
Impact PS-1. Commercial cannabis cultivation under the Program would increase demand for fire protection, police protections, public schools, parks, libraries, and other public facilities. Impacts would be less than significant.	<i>Direct and Indirect:</i> No Mitigation Required	<i>Direct and Indirect:</i> Less than Significant
Impact PS-2. Cannabis product manufacturing under the Program would increase demand for fire protection, police protections, public schools, libraries, and other public services. Impacts would be less than significant.	<i>Direct and Indirect:</i> No Mitigation Required	<i>Direct and Indirect:</i> Less than Significant
Secondary Impact PS-3. Unregulated commercial cannabis cultivation and cannabis product manufacturing under the Program could increase demand for fire protection, police protection, public schools, parks, libraries, and other public	MM AT-1.3a and MM AT-1.3b would apply.	Impacts would be Significant and Unavoidable

Table ES-1. Summary of Impacts, Mitigation, and Residual Impacts		
Impact	Mitigation Measure	Residual Significance
facilities. Impacts would be significant and unavoidable.		
Population, Employment, and Housing		
Impact POP-1. Commercial cannabis cultivation and manufacturing under the Program could have adverse effects on the housing market due to population and employment growth and associated demand for housing that is above previously projected levels of agricultural and manufacturing job growth; and could indirectly cause an increased rate of construction of housing units on existing lots of record due to requirements of the Program. This impact would be less than significant with mitigation.	<i>Direct:</i> MM POP-1.1 would apply. <i>Indirect:</i> No mitigation required.	<i>Direct:</i> Less than Significant with Mitigation <i>Indirect:</i> Less than Significant
Secondary Impact POP-2. Unregulated commercial cannabis cultivation and cannabis product manufacturing under the Program could potentially have adverse effects due to substantial population growth, could displace substantial existing housing, or displace a substantial number of people, which would be a significant and unavoidable impact.	MM AT-1.3a and MM AT-1.3b would apply.	Impacts would be Significant and Unavoidable
Transportation and Traffic		
Impact TRA-1. Program adoption would increase traffic on roadways and daily vehicle miles traveled within the County, incrementally affecting the performance of the circulation system, particularly roadways operations, with significant effects on existing congested roads, highways and intersections that operate below acceptable levels of service and lesser effects on transit and bicycle facilities. This impact would be significant and unavoidable.	<i>Direct:</i> MM TRA-1.1 would apply. <i>Indirect:</i> MM TRA-1.1 would apply.	<i>Direct:</i> Significant and Unavoidable <i>Indirect:</i> Significant and Unavoidable
Impact TRA-2. Licensing of commercial cannabis cultivation could result in additional traffic safety hazards, inadequate emergency access, or impacts to road maintenance, particularly along rural County roads. Impacts would be less than significant with mitigation.	<i>Direct:</i> MM TRA-2.1 and MM TRA-2.2 would apply. <i>Indirect:</i> MM TRA-2.1 and MM TRA-2.2 would apply.	<i>Direct:</i> Less than Significant with Mitigation <i>Indirect:</i> Less than Significant with Mitigation
Impact TRA-3. Licensing of cannabis product manufacturing could result in additional traffic safety hazards, inadequate emergency access, or impacts to road maintenance, particularly along rural	<i>Direct and Indirect:</i> No mitigation required.	<i>Direct and Indirect:</i> Less than Significant

Table ES-1. Summary of Impacts, Mitigation, and Residual Impacts		
Impact	Mitigation Measure	Residual Significance
County roads. Impacts would be less than significant.		
Secondary Impact TRA-4. Licensing of commercial cannabis cultivation and cannabis product manufacturing could affect the performance of the circulation system, and result in additional traffic safety hazards, inadequate emergency access, or impacts to road maintenance, particularly along rural County roads.	MM AT-1.3a and MM AT-1.3b would apply.	Impacts would be Significant and Unavoidable
Utilities and Energy Conservation		
Impact UE-1. The Program could increase demand or result in the expansion of facilities for water, wastewater, or solid waste services within the County due to licensing of commercial cannabis cultivation and product manufacturing activities. This impact would be less than significant with mitigation.	<i>Direct:</i> MM AQ-1.3, MM LU-1.1-6, MM UE-1.1, MM HYDRO-2.1, MM HYDRO-2.2 and MM HYDRO-1.3 would apply. <i>Indirect:</i> MM HYDRO-2.1, MM HYDRO-2.2, and MM HYDRO-1,3 would apply.	<i>Direct:</i> Less than Significant with Mitigation <i>Indirect:</i> Less than Significant with Mitigation
Impact UE-2. The Program would generate additional demand for energy resources within the County and may conflict with energy conservation policies and objectives through the operation of commercial cannabis cultivation and manufacturing facilities. This impact would be less than significant with mitigation.	<i>Direct:</i> MM LU-1.1-6 and MM HGH-1,1 would apply. <i>Indirect:</i> None required.	<i>Direct:</i> Less than Significant with Mitigation <i>Indirect:</i> Less than Significant
Secondary Impact UE-3. The Program could increase demand or result in the expansion of facilities for water, wastewater, solid waste services, and energy resources within the County and may conflict with energy conservation policies due to licensing and operation of commercial cannabis cultivation and product manufacturing activities. This impact would be significant and unavoidable.	MM AT-1.3a and MM AT-1.3b would apply.	Impacts would be Significant and Unavoidable