

2.16 Transportation

This section describes the applicable federal, state, and local transportation regulations and policies; discusses the existing roadway network and transportation facilities in the vicinity of the proposed Cannabis Program; and analyzes the potential impacts on transportation from implementation of the Cannabis Program. Mitigation measures that would reduce impacts, where applicable, are also discussed.

Pursuant to Senate Bill (SB) 743, Public Resources Code (PRC) Section 21099, and State CEQA Guidelines Section 15064.3(a), generally, vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts, and a project's effect on automobile delay shall no longer constitute a significant impact under CEQA. Therefore, the transportation analysis herein evaluates impacts using VMT and does not include level of service (LOS) analysis. The County of San Diego Transportation Study Guidelines, described in detail below, were used as a guide for the VMT analysis and used to determine VMT impacts from the Cannabis Program.

Comments received during the notice of preparation (NOP) identified concerns regarding the potential for the Cannabis Program to affect roadway safety and result in transportation hazards, reduced access to public transportation, increased VMT, and increased traffic. These issues are addressed in this section, as appropriate. All comments received in response to the NOP are presented in Appendix A of this PEIR.

A summary of impacts evaluated in this section is provided in Table 2.16.1.

Table 2.16.1 Transportation Summary of Impacts

Issue Number	Issue Topic	Project Direct Impact	Project Cumulative Impact	Impact after Mitigation
1	Conflict with a Program, Plan, Ordinance, or Policy Addressing the Circulation System	Alternative 1: No Impact Alternatives 2–5: Less than Significant Impact	Alternative 1: No Impact Alternatives 2–5: Less than Significant Impact	Alternative 1: No Impact Alternatives 2–5: Less than Significant Impact
2	Exceed the Threshold for VMT	Alternative 1: Less than Significant Alternatives 2–5: Significant Impact	Alternative 1: Less than Significant Alternatives 2–5: Significant Impact	Alternative 1: Less than Significant Alternatives 2–5: Significant Unavoidable Impact
3	Substantially Increase Hazards due to a Design Feature	Alternative 1: No Impact Alternatives 2–5: Less than Significant Impact	Alternative 1: No Impact Alternatives 2–5: Less than Significant Impact	Alternative 1: No Impact Alternatives 2–5: Less than Significant Impact
4	Result in Inadequate Emergency Access	Alternative 1: No Impact Alternatives 2–5: Less than Significant Impact	Alternative 1: No Impact Alternatives 2–5: Less than Significant Impact	Alternative 1: No Impact Alternatives 2–5: Less than Significant Impact

2.16.1 Existing Conditions

This section describes the existing roadway network, transit services, and bicycle and pedestrian facilities in the unincorporated county.

2.16.1.1 Roadway System

The County Maintained Road Register Report classifies the existing roadway network in the unincorporated county by 7 categories: interstates, freeways or expressways, principal arterials, minor arterials, major collectors, minor collectors, and local roads (County of San Diego 2023a). The County of San Diego General Plan (General Plan) groups roadways by similar types: state highways, Mobility Element roadways, local public roads, and private roads. “Mobility Element roadways” refers to the portion of the Mobility Element roadway system that has been constructed. The Roads Section of the County of San Diego Department of Public Works is responsible for maintaining nearly 1,947 miles of Mobility Element roadways and other transportation facilities, such as bridges and guardrails, signs, traffic signals, and crosswalks. Within the unincorporated county, there are approximately 5 miles of principal arterial roads, 146 miles of minor arterial roads, 481 major collector roads, 198 minor collector roads, and 1,117 local roads (County of San Diego 2023a).

2.16.1.2 Transit System

The San Diego Metropolitan Transit System (MTS) and the North County Transit District (NCTD) are the 2 agencies responsible for providing bus, rail, and paratransit services within the San Diego region. In addition, the Amtrak Pacific Surfliner provides intercity rail service along the Los Angeles–San Diego–San Luis Obispo Rail Corridor. Other specialized transit services are offered through the Consolidated Transportation Service Agency for the San Diego region.

MTS provides bus and rail services throughout San Diego County. MTS provides almost 100 fixed bus routes throughout its service area, including local, express, and rural routes, as well as paratransit services. Bus services are provided in the unincorporated county by the San Diego Transit Corporation (SDTC), which is owned by MTS. MTS contractors serve the cities of San Diego, El Cajon, La Mesa, and National City, in addition to the unincorporated communities of Lakeside, Alpine, Rancho San Diego, Casa de Oro, and Spring Valley (MTS 2023). SDTC bus service provides connections to light and heavy rail services and offers local service and express service (MTS 2023).

NCTD operates a bus system referred to as the BREEZE, which serves unincorporated north county. BREEZE serves a geographic area of approximately 1,020 square miles and operates approximately 30 different bus routes, many of which provide connections to light rail systems and tourist attractions (NCTD 2022). The east-west SPRINTER hybrid rail line spans 22 miles and serves 15 stations along the State Route (SR) 78 corridor. The Buena Creek SPRINTER station is the only stop located within the unincorporated county.

2.16.1.3 Bicycle and Pedestrian Network

As of 2018, of the roughly 1,950 miles of county-maintained roadways, less than half include sidewalks, and less than 1 percent include a bicycle route or lane (County of San Diego 2018:

ES-1). The County of San Diego Active Transportation Plan (ATP) classifies bicycle lanes in the following 4 types:

- **Class I bike path:** A completely separated right-of-way for the exclusive use of bicycles and pedestrians with crossflow by motorists minimized.
- **Class II bike lanes:** A striped lane for one-way bike travel on a street or highway.
- **Class III bike route:** Provides for shared use with vehicular traffic within the travel lane.
- **Class IV separated bikeway:** A physically separated bikeway for the exclusive use of bicycles. The separation may include, but is not limited to, grade separation, flexible posts, inflexible posts, inflexible barriers, or on-street parking.

As of 2018, the unincorporated county had 1 mile of class I bicycle paths, 145 miles of class II bicycle lanes, and 9 miles of class III bicycle routes, for a total of 155 miles of existing bicycle facilities. As of 2018, there were no class IV bicycle facilities in the unincorporated county (County of San Diego 2018: 3-3).

Pedestrian facilities in the unincorporated county include sidewalks, pathways, and trails. Results from a County Pedestrian Gap Analysis and evaluation of existing facilities revealed that approximately 53 percent, or 401 miles, of the assessment roadways had no sidewalk or pedestrian facility (County of San Diego 2018: 3-3).

2.16.2 Regulatory Framework

2.16.2.1 *Federal*

No federal laws or regulations addressing transportation and circulation are applicable to the Cannabis Program. However, federal regulations relating to the Americans with Disabilities Act, Title VI, which prohibits discrimination based on race, color, and national origin, and Environmental Justice (Executive Order 12898: Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations) are applicable to the manner in which transit service is provided.

2.16.2.2 *State*

California Department of Transportation

The California Department of Transportation (Caltrans) is the state agency responsible for the design, construction, maintenance, and operation of the California State Highway System, as well as the segments of the Interstate Highway System that are within California. Caltrans District 11 is responsible for the operation and maintenance of highways in the unincorporated area. Caltrans requires a transportation permit for any transport of heavy construction equipment or materials that necessitates the use of oversized vehicles on state highways.

California Manual on Uniform Traffic Control Devices

The *California Manual on Uniform Traffic Control Devices* (CA MUTCD) “Part 6: Temporary Traffic Control” provides principles and guidance regarding the movement of all roadway users

(e.g., motorists, bicyclists, pedestrians) through or around temporary traffic control zones while reasonably protecting road users, workers, responders to traffic incidents, and equipment. In addition, this document notes that temporary traffic control plans and devices shall be the responsibility of the authority of a public body or official having jurisdiction for guiding road users (Caltrans 2024a: 1029).

Encroachment Permits Manual

The Caltrans *Encroachment Permits Manual* provides information on the permitting process, describes departmental policies, and maintains uniform methods and procedures related to the issuance of encroachment permits (Caltrans 2024b). Section TR-0045 of the *Encroachment Permits Manual* describes the general provisions of a Caltrans encroachment permit, including standards of construction and requirements for public traffic control.

California Fire Code

The 2022 California Fire Code, which is codified as Part 9 of the Title 24 of the California Code of Regulations (CCR), incorporates by adoption the 2021 International Fire Code and contains regulations related to construction, maintenance, access, and use of buildings. Topics addressed in the California Fire Code include design standards for fire apparatus access (e.g., turning radii, minimum widths), standards for emergency access during construction, provisions intended to protect and assist fire responders, and several other general and specialized fire safety requirements for new and existing buildings and the surrounding premises. The California Fire Code contains specialized technical regulations related to fire and life safety. The California Building Standards Code, including the California Fire Code, is revised and published every 3 years by the California Building Standards Commission.

2.16.2.3 Local

San Diego Association of Governments

The San Diego Association of Governments (SANDAG) is the Metropolitan Planning Organization (MPO) and the regional transportation planning agency for the entire San Diego region. SANDAG is required to prepare a long-range transportation plan for all modes of transportation—public transit, automobiles, bicyclists, and pedestrians—every 4 years. In addition to preparing the region’s long-range transportation plan, SANDAG assists in planning for transit, bicycle networks, roadway improvements, and airport land uses. SANDAG is also required by state and federal laws to develop a Regional Transportation Improvement Program (RTIP), a multiyear program of proposed transportation projects in the San Diego region. SANDAG has produced the following documents that identify transportation plans and policies in the San Diego region.

2021 Regional Plan

The SANDAG Board of Directors adopted San Diego Forward: The 2021 Regional Plan (2021 Regional Plan) in December 2021. The 2021 Regional Plan combines the Regional Transportation Plan, Sustainable Communities Strategy, and Regional Comprehensive Plan. The 2021 Regional Plan anticipates the growth that will occur in the San Diego region and provides a blueprint for the regional transportation system, as well as a vision for promoting sustainability and offering a variety of mobility options for people and goods. The 2021 Regional Plan strategies are organized around the 5 strategies called “5 Big Moves”: Next

Operating System, Complete Corridors, Transit Leap, Mobility Hubs, and Flexible Streets (SANDAG 2021: 6). Project, policies, and programs developed to achieve the 2021 Regional Plan goals are organized around the following 3 core strategies:

- Invest in a reimagined transportation system.
- Incentivize sustainable growth and development.
- Implement innovative demand and system management.

Regional Transportation Improvement Program

The RTIP is a 5-year investment plan that identifies projects and programs funded by federal, state, local, and private funds. The 2023 RTIP covers 5 fiscal years (i.e., 2023 to 2027) and incrementally implements the 2021 Regional Plan. The 2023 RTIP is a prioritized program designed to implement the regional strategy for providing mobility and improving the safety, condition, and efficiency of the transportation system (SANDAG 2022: 1-1). The 2023 RTIP was adopted by the SANDAG Board of Directors in September 2022 and approved by the Federal Highway Administration and Federal Transit Administration in December 2022.

San Diego County General Plan

The General Plan serves as a blueprint for development and associated improvements in the county. The Mobility Element sets goals and establishes policies that intend to improve the transportation network and enhance mobility for transportation system users. The following General Plan policies related to transportation and mobility are applicable to the proposed Cannabis Program (County of San Diego 2011).

- **Policy M-3.1: Public Road Rights-of-Way.** Require development to dedicate right-of-way for public roads and other transportation routes identified in the Mobility Element roadway network, Community Plans, or Road Master Plans. Require the provision of sufficient right-of-way width, as specified in the County Public Road Standards, Active Transportation Plan and Community Trails Master Plan, to adequately accommodate all users, including transit riders, pedestrians, bicyclists, and equestrians.
- **Policy M-3.2: Traffic Impact Mitigation:** Require development to contribute its fair share toward financing transportation facilities, including mitigating the associated direct and cumulative traffic impacts caused by their project on both the local and regional road networks. Transportation facilities include road networks and related transit, pedestrian and bicycle facilities, and equestrian.
- **Policy M-3.3: Multiple Ingress and Egress.** Require development to provide multiple ingress/egress routes in conformance with State law and local regulations.
- **Policy M-4.3: Rural Roads Compatible with Rural Character.** Design and construct public roads to meet travel demands in Semi-Rural and Rural Lands that are consistent with rural character while safely accommodating transit stops when deemed necessary, along with bicyclists, pedestrians, and equestrians. Where feasible, utilize rural road design features (e.g., no curb and gutter improvements) to maintain community character.
- **Policy M-4.4: Accommodate Emergency Vehicles.** Design and construct public and private roads to allow for necessary access for appropriately-sized fire apparatus and emergency vehicles while accommodating outgoing vehicles from evacuating residents.

- **Policy S-2.7: Evacuation Access.** All development proposals are required to identify evacuation routes at the Community Plan level and identify and facilitate the establishment of new routes needed to ensure effective evacuation. Evacuation routes should be incorporated into existing Community Wildfire Protection Plans where available.
- **Policy S-4.5: Access Roads.** Require development to provide additional access roads where feasible to provide for safe access of emergency equipment and civilian evacuation concurrently. The width, surface, grade, radius, turnarounds, turnouts, bridge construction, vegetative management and brush clearance around roadways, and lengths of fire apparatus access roads shall meet the requirements of the State and San Diego County Consolidated Fire Codes. All requirements and any deviations will be at the discretion of the Fire Code Official.

County of San Diego Active Transportation Plan

The ATP is a master plan and policy document that guides the implementation of active transportation (i.e., nonmotorized modes of travel) projects in unincorporated San Diego County. The ATP establishes goals, objectives, and actions related to increasing accessibility and connectivity of the active transportation network throughout the unincorporated county. The following objectives included in the ATP are relevant to the Cannabis Program (County of San Diego 2018).

- **Objective 1:** Achieve a reduction in collision rates by 2050 while achieving an increase in mode share for people biking and walking.
- **Objective 2.1:** Plan for a comprehensive network of facilities that are accessible to all users, including people walking, biking, and those utilizing assistance device such as wheelchairs.
- **Objective 2.2:** Fill gaps in the existing pedestrian and bicycle networks to create a continuous accessible network.
- **Objective 2.3:** Keep bicycle and pedestrian access open during construction projects.
- **Objective 3.1:** Increase the frequency and types of biking and walking trips in San Diego County to improve public health, decrease the number of vehicle trips, and reduce impacts to the environment.

County of San Diego Community Trails Master Plan

The Community Trails Master Plan (CTMP) guides community trail development and management in unincorporated San Diego County. The CTMP includes design guidelines, implementation strategies, and outlines sequential steps for programmatic growth (County of San Diego 2005). The following countywide policies (CP) included in the CTMP are relevant to the Cannabis Program.

- **CP 1.1:** Continue to provide and expand the variety of trail experiences, including urban/suburban, rural, wilderness, multi-use and single use, staging areas and support facilities.
- **CP 2.3:** Participate in completing missing segments of regional trails to satisfy the need for long-range trail opportunities.

- **CP 3.7:** Development projects and other discretionary projects proposed on lands upon which a trail or pathway in the Regional Trail Plan or Community Trails Master Plan has been identified may be required to dedicate and improve land for trail or pathway purposes.
- **CP 4.2:** Public improvement projects, such as road widening, bridge construction, and flood control projects, which may impact trails or pathways in the Regional Trail Plan or Community Trails Master Plan should incorporate such facilities in project design and construction.
- **CP 4.3:** Encourage the involvement and input of the agricultural community in matters relating to trails on or adjacent to agricultural lands and place a priority on the protection of agriculture.

County of San Diego Transportation Study Guidelines

The San Diego County Board of Supervisors approved the updated county Transportation Study Guidelines in September 2022. The Transportation Study Guidelines provide criteria to guide project evaluation as it relates to county transportation goals, policies, and plans, and through procedures established under CEQA (County of San Diego 2022). The Transportation Study Guidelines provide screening criteria for projects that are presumed to result in a less-than-significant VMT impact.

County of San Diego Consolidated Fire Code

The County of San Diego, in collaboration with the local fire protection districts, created the County of San Diego Consolidated Fire Code (CFC) in 2001. The CFC contains the County's and fire protection districts' amendments to the California Fire Code. Emergency ingress/egress is established the CFC. Ingress/egress is necessary for both citizen evacuation and to provide access for emergency vehicles in the event of a fire or other emergency. Section 96.1.503 of the CFC dictates minimum design standards for "Fire Apparatus Access Roads" and includes minimum road standards, secondary access requirements, and restrictions for gated communities (County of San Diego 2023b).

San Diego County Code of Regulatory Ordinances

Title 7 (Highways and Traffic) in the Regulatory Code addresses uses of the county roadway system and includes requirements for the obtaining an encroachment permit for access and improvements to County-maintained roads under Section 71.602.

San Diego County Public Road Standards

The County of San Diego Public Road Standards serve as a guideline for the design and construction of public roadway improvement projects within unincorporated San Diego County. These standards apply to County-initiated public road improvement projects, as well as privately initiated public road improvement projects. Section 6 of the Public Road Standards details design standards for roadways, including for sight distance and minimum curb radii. Section 7 establishes bikeway requirements and design standards (County of San Diego 2012).

San Diego County Private Road Standards

These standards provide minimum design and construction requirements for private road improvements required as conditions of land development approval in unincorporated areas of the county.

2.16.3 Analysis of Project Impacts and Determination of Significance

2.16.3.1 *Thresholds of Significance*

The significance criteria used to evaluate the project impacts to transportation under CEQA are based on Appendix G of the State CEQA Guidelines. Transportation impacts would be considered significant if the project would:

- conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities;
- conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b);
- substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or
- result in inadequate emergency access.

2.16.3.2 *Issues Not Discussed Further*

All thresholds of significance related to transportation are evaluated in the following sections.

2.16.3.3 *Approach to Analysis*

This analysis evaluates the effect of cannabis cultivation operations countywide based on the information provided in Chapter 1, “Project Description, Location, and Environmental Setting,” as well as Figure 1.2, on the potential locations of future cannabis uses. Evaluation of potential transportation-related impacts is based on a review of existing documents and studies that address transportation. 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 the project would comply with relevant state and local laws, ordinances, and regulations.

Given the broad scope of the Cannabis Program (i.e., covering the unincorporated area of the county) and its role as a planning document designed to guide future decision-making related to licensing and permitting of commercial cannabis facilities, the study area (also referred to as the program area in this PEIR) for the project is the unincorporated area of the county under the County of San Diego’s jurisdiction where cultivation and noncultivation activities may be permitted (i.e., all unincorporated lands excluding tribal lands, state and federally owned lands, and military installations).

The analysis in this Draft PEIR remains programmatic. Because specific commercial cannabis facilities have yet to be defined, this PEIR considers the types of impacts that could occur with implementation of future development consistent with the Cannabis Program. Individual future

licensed commercial cannabis facilities within the unincorporated area are currently unknown and would be evaluated by the County to determine if they are within the scope of this PEIR or if they would result in project-specific impacts in addition to what is concluded in this analysis.

VMT Analysis

The County of San Diego established transportation-based significance thresholds through the *County of San Diego Transportation Study Guidelines* (September 2022). The guidelines outline the analysis methods, significance thresholds, and screening criteria in which the County uses to identify VMT-related impacts under State CEQA Guidelines Section 15064.3(b). According to the Transportation Study Guidelines, a VMT assessment includes a project screening as a first step to determine if a full VMT assessment would be required. If a project cannot be screened out, a full VMT analysis is required.

Screening Criteria

Section 3.3.1 of the *County of San Diego Transportation Study Guidelines* provides the following thresholds to determine whether a project could be presumed to result in a less-than-significant VMT impact:

- **Projects Located in a VMT Efficient Area:** Projects located in a VMT efficient area with an average VMT per Resident, VMT per Employee, or VMT per Service Population of 15 percent below the baseline average for the entire San Diego County region, including the incorporated cities.
- **Projects Located in a Transit Accessible Area:** Projects located within a half mile of an existing major transit stop or an existing stop along a high-quality transit corridor.¹
- **Locally Serving Retail/Service Projects:** Retail projects with less than 50,000 square feet of building area.
- **Locally Serving Public Facilities and Other Uses:** Public facilities that serve the surrounding community or public facilities that are passive use.
- **Redevelopment Projects with Greater VMT Efficiency:** Redevelopment projects where the proposed project's total project VMT is less than the existing land use's total VMT.
- **Affordable Housing:** An affordable housing project with 100 percent of units that are affordable.

Some portions of the Cannabis Program meet several of the criteria listed above. The screening criteria analysis is described below in Section 2.16.3.5. Because specific project details, such as location, size, and specific use of individual projects under the Cannabis Program, have not yet been defined, a project-level VMT analysis cannot be conducted for the full program at this time. Thus, further analysis may be required at the time in which specific uses are identified, as described further in section 2.16.3.5.

¹ Major transit stop: A site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods (PRC Section 21064.3). High quality transit corridor: A corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute periods (PRC Section 21155).

2.16.3.4 Issue 1: Conflict with a Program, Plan, Ordinance, or Policy Addressing the Circulation System

Guidelines for Determination of Significance

According to Appendix G of the State CEQA Guidelines and the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Transportation and Traffic* (County of San Diego 2011), the Cannabis Program would result in a significant impact if it would conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

Impact Analysis

New commercial cannabis facilities could affect roadway safety on unincorporated county roadways due to increased truck use; however, construction associated with future commercial cannabis facilities would be required to meet all County requirements related to construction, including the County Public Road Standards and Title 7 of the County Regulatory Code. Section 6 of the Public Road Standards details design standards for roadways, including sight distance and minimum curb radii, while Section 7 establishes bikeway requirements and design standards. An encroachment permit under Section 71.602 of the Regulatory Code and associated traffic control permit for construction activities and traffic control plan would also be required for commercial cannabis facilities making frontage or access improvements consistent with General Plan Policies M-3.1 and M-4.3.

The proposed Cannabis Program includes the following amendments to the County Zoning Ordinance and Regulatory Code to address pedestrian and bicycle usage.

- Zoning Ordinance amendment that would create bicycle parking requirements for commercial cannabis facilities under Section 6995(e)(5).
- Regulatory Code amendment that would require the identification of pedestrian pathways to access sites hosting temporary cannabis events under Section 21.2534(e)(3)(D)(E).

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 as well as expand their existing facilities and operations to a total of 10,000 square feet of building area for each site. However, no new cultivation or noncultivation activities would occur.

Potential expansion of uses under Alternative 1 would occur within the existing sites and would not result in any alteration of the existing transportation network and would not conflict with adopted transportation policies, plans, or programs including the pedestrian, bicycle, transit, and vehicle networks.

There would be no impact 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 between cannabis uses and certain state-defined sensitive uses, including schools, daycares, and youth centers.

Commercial cannabis facilities would be required to meet all County requirements related to construction, including the County Public Road Standards and Title 7 of the County Regulatory Code. Section 6 of the Public Road Standards details design standards for roadways, while Section 7 establishes bikeway requirements and design standards. An encroachment permit under Section 71.602 of the Regulatory Code and associated traffic control permit for construction activities and traffic control plan would also be required for commercial cannabis facilities making frontage or access improvements. In addition, the proposed Cannabis Program includes amendments to the County Zoning Ordinance and Regulatory Code identified above to address bicycle and pedestrian uses. In addition, subsequent projects would be required to be consistent with the County General Plan policies. If subsequent projects would result in physical alterations to the public right-of-way, Policy M-3.1 would require project applicants to provide sufficient right-of-way to accommodate active modes of transportation. Policy M-3.2 would be implemented prior to permit approval. In addition, design and safety regulations prescribed by Policies M-3.3, M-4.3, M-4.4, M-2.7, and M-4.5 would need to be met for project permit approval. Thus, the proposed Cannabis Program under Alternative 2 would not conflict with County policies and regulations regarding transportation or circulation. This impact would be less than significant under Alternative 2.

Alternative 3: Cannabis Program with Expanded County Regulations

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

As described above for Alternative 2, commercial cannabis facilities would be required to meet all County requirements related to construction and roadway modifications, including the County Public Road Standards and Title 7 of the County Regulatory Code. In addition, the proposed Cannabis Program includes amendments to the County Zoning Ordinance and Regulatory Code, identified above, to address bicycle and pedestrian uses. In addition, as identified for Alternative 2, subsequent projects would be required to be consistent and comply with County General Plan policies. Thus, the proposed Cannabis Program under Alternative 3 would not conflict with County policies and regulations regarding transportation or circulation.

This impact would be less than significant under Alternative 3.

Alternative 4: Cannabis Program with Outdoor Cannabis Cultivation Prohibition

The Cannabis Program under Alternative 4 is anticipated to accommodate up to 212 cultivation and 170 noncultivation sites/licenses within the county in 2044 (refer to Table 1.4 in Chapter 1,

“Project Description, Location, and Environmental Setting,” for a full list of development assumptions). Alternative 4 would allow mixed-light and indoor cannabis cultivation only when contained within a building. Alternative 4 additionally prohibits the development of cannabis facilities within 1,000 feet of sensitive uses, including other cannabis facilities. Advertising of cannabis on billboards would also be prohibited within 1,000 feet of sensitive uses.

As described above for Alternative 2, commercial cannabis facilities would be required to meet all County requirements related to construction and roadway modifications, including the County Public Road Standards and Title 7 of the County Regulatory Code. In addition, the proposed Cannabis Program includes amendments to the County Zoning Ordinance and Regulatory Code, identified above, to address bicycle and pedestrian uses. As identified for Alternative 2, subsequent projects would be required to be consistent and comply with County General Plan policies. Thus, the proposed Cannabis Program under Alternative 4 would not conflict with County policies and regulations regarding transportation or circulation.

This impact would be less than significant under Alternative 4.

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

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

As described above for Alternative 2, commercial cannabis facilities would be required to meet all County requirements related to construction and roadway modifications, including the County Public Road Standards and Title 7 of the County Regulatory Code. In addition, the proposed Cannabis Program includes amendments to the County Zoning Ordinance and Regulatory Code, identified above, to address bicycle and pedestrian uses. As identified for Alternative 2, subsequent projects would be required to be consistent and comply with County General Plan policies. Thus, the proposed Cannabis Program under Alternative 5 would not conflict with County policies and regulations regarding transportation or circulation.

This impact would be less than significant under Alternative 5.

2.16.3.5 Issue 2: Exceed the Threshold for VMT

Guidelines for Determination of Significance

According to Appendix G of the State CEQA Guidelines, the County Transportation Study Guidelines, and the Technical Advisory, the Cannabis Program would result in a significant impact if it would conflict or be inconsistent with State CEQA Guidelines Section 15064.3(b).

Impact Analysis

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 (described in Section 2.16.3.3).

Different VMT screening criteria would apply depending on the subsequent project's different land use types, locations, and size. The Cannabis Program would allow cannabis facilities to be permitted within the unincorporated county. Individual future commercial cannabis sites under the Cannabis Program are yet to be defined, so the location and size of the type of cannabis development is currently unknown. However, the following screening criteria could apply to commercial cannabis sites under the Cannabis Program:

- Projects Located in a VMT Efficient Area
- Projects Located in a Transit Accessible Area
- Locally Serving Retail/Service Projects

These criteria and how they apply to individual commercial cannabis facilities are discussed below:

Projects Located in a VMT-Efficient Area or Transit-Accessible Area

As discussed in Section 2.16.3.3, a project located in a VMT-efficient area or a transit-accessible area can be presumed to have a less-than-significant VMT-related transportation impact. The Cannabis Program would allow cannabis facilities to be developed in certain areas with agricultural, commercial, or industrial zoning in the unincorporated areas. The majority of the agricultural, commercial, and industrial zoning areas on the eastern side of the county are not located in a VMT-efficient, or transit-accessible area based on the screening criteria. The number of zones that would permit cannabis development and that are located within a screening criteria area (i.e., VMT-efficient or transit-accessible area) is significantly reduced compared to the full geographical scope of the Cannabis Program. For cannabis facilities located outside of a VMT-efficient area or 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 Locally Serving Retail Projects criteria, which are described in the subsequent sections.

Locally Serving Retail Projects

As described in Section 1.6.1, "Project Components," the Cannabis Program would allow for the development of the following commercial cannabis uses in select areas of the unincorporated county: cannabis storefront, non-storefront retail, and consumption lounges; cannabis cultivation facilities; cannabis manufacturing facilities; cannabis microbusinesses; cannabis testing laboratories; and cannabis temporary events. According to the County of San Diego Transportation Study Guidelines, commercial cannabis sites would qualify for the "Locally Serving Retail Projects" criteria if the facility is less than 50,000 sf. For commercial cannabis facilities that are larger than 50,000 sf, VMT could exceed the allowable threshold identified by the county and could potentially result in a significant VMT-related impact.

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 as well as expand their existing facilities and operations to a total of 10,000 square feet of building area for each site without additional discretionary review. However, no new cultivation or noncultivation activities would occur. The potential expansion of these 5 sites are considered baseline development and would also be below the square footages for VMT screening for locally serving retail projects under Table 2.16.2 would not result in significant new VMT impacts.

This impact would be less than significant under Alternative 1.

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

Under Alternative 2, outdoor cultivation activities could occur on up to 472 acres of land, with a total of up to 1,772,120 sf (i.e., approximately 41 acres) of building area. Mixed-light cultivation activities could occur on up to 293 acres of land, with a total of up to 668,184 sf (i.e., approximately 15 acres) of building area. Indoor cultivation activities could occur on up to 8 acres of land, with a total of up to 240,000 sf (i.e., approximately 5.5 acres) of building area. Noncultivation uses could occur on up to 259 acres of land, with a total of up to 2,030,400 sf (i.e., approximately 47 acres) of building area. This would result in a total development footprint (i.e., cultivation activities, buildings, caretaker housing, storage buildings, on-site nurseries, agricultural shade or crop structures, water tanks, ponds, parking, cannabis operation buildings, other associated improvements) of approximately 1,032 acres, with approximately 108 acres (4,710,704 sf) of building area for Alternative 2. Cannabis facilities would be required to observe a 600-foot buffer from certain state-defined sensitive uses, including schools, daycares, and youth centers.

As described above, individual commercial cannabis cultivation and noncultivation sites under the Cannabis Program for Alternative 2 could potentially be screened out of the requirement for conducting a VMT analysis and presumably have a less-than-significant VMT impact based on the County's established guidelines. Table 2.16.2, presented at the end of this section, summarizes the applicable screening criteria from the County's Transportation Study Guidelines.

Although commercial cannabis cultivation and noncultivation sites under Alternative 2 could potentially be screened out from a VMT analysis if the project components meet the screening thresholds identified in Table 2.16.2, there is a possibility that new commercial cannabis facilities would not meet any of the screening criteria; thus, their associated VMT output may exceed the allowable threshold identified by the County.

The VMT impact under Alternative 2 would be potentially significant.

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) and is the same as Alternative 2 described above. Alternative 3 additionally prohibits the development of cannabis facilities within 1,000 feet of sensitive uses, including

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

Similar to Alternative 2, individual commercial cannabis cultivation and noncultivation sites under the Cannabis Program for Alternative 3 could potentially be screened out from conducting a VMT analysis and presumably have a less-than-significant VMT impact based on the County's established guidelines. Table 2.16.2, presented at the end of this section, summarizes the applicable screening criteria from the County's Transportation Study Guidelines.

Although commercial cannabis cultivation and noncultivation sites under Alternative 3 could potentially be screened out from a VMT analysis if the project components meet the screening thresholds identified in Table 2.16.2, there is a possibility that new cannabis facilities would not meet any of the screening criteria; thus, their associated VMT output may exceed the allowable threshold identified by the County.

The VMT impact under Alternative 3 would be potentially significant.

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). This alternative would result in 2,002,524 sf of cannabis building area and 479 acres of land area dedicated to cannabis cultivation activity (whereas Alternatives 2, 3, and 5 would result in 2,680,304 sf of cannabis building area and 773 acres of land area dedicated to cannabis cultivation activity). Alternative 4 would allow mixed-light and indoor cannabis cultivation only when contained within a building. Alternative 4 additionally prohibits the development of cannabis facilities within 1,000 feet of sensitive uses, including other cannabis facilities. Advertising of cannabis on billboards would also be prohibited within 1,000 feet of sensitive uses.

Similar to Alternative 2, individual commercial cannabis cultivation and noncultivation sites under the Cannabis Program for Alternative 4 could potentially be screened out from conducting a VMT analysis and presumably have a less-than-significant VMT impact based on the County's established guidelines. Table 2.16.2, presented at the end of this section, summarizes the applicable screening criteria from the County's Transportation Study Guidelines.

While commercial cannabis cultivation and noncultivation sites under Alternative 4 could potentially be screened out from a VMT analysis if the project components meet the screening thresholds identified in Table 2.16.2, there is a possibility that new cannabis facilities would not meet any of the screening criteria; thus, their associated VMT output may exceed the allowable threshold identified by the County.

The VMT impact under Alternative 4 would be potentially significant.

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) and is the same as Alternative 2 described above. Alternative 5 additionally

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

Similar to Alternative 2, individual commercial cannabis cultivation and noncultivation sites under the Cannabis Program for Alternative 5 could potentially be screened out from conducting a VMT analysis and presumably have a less-than-significant VMT impact based on the County's established guidelines. Table 2.16.2, presented at the end of this section, summarizes the applicable screening criteria from the County's Transportation Study Guidelines.

Although commercial cannabis cultivation and noncultivation sites under Alternative 5 could potentially be screened out from a VMT analysis if the project components meet the screening thresholds identified in Table 2.16.2, there is a possibility that new cannabis facilities would not meet any of the screening criteria, thus, their associated VMT output may exceed the allowable threshold identified by the County.

The VMT impact under Alternative 5 would be potentially significant.

2.16.3.6 Issue 3: Substantially Increase Hazards due to a Design Feature

Guidelines for Determination of Significance

Appendix G of the State CEQA Guidelines establishes the following guidelines for determining significance of effects related to substantially increased hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

In addition, the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Transportation and Traffic* (County of San Diego 2011) establishes the following guidelines for determining significance of effects related to transportation hazards:

- Design features/physical configurations of access roads may adversely affect the safe movement of all users along the roadway.
- The percentage or magnitude of increased traffic on the road due to the proposed project may affect the safety of the roadway.
- The physical conditions of the project site and surrounding area, such as curves, slopes, walls, landscaping or other barriers, may result in conflicts with other users or stationary objects.
- Conformance of existing and proposed roads to the requirements of the private or public road standards, as applicable.
- Design features/physical configurations on a road segment or at an intersection that may adversely affect the visibility of pedestrians or bicyclists to drivers entering and exiting the site, and the visibility of cars to pedestrians and bicyclists.
- The amount of pedestrian activity at the project access points that may adversely affect pedestrian safety.

- The preclusion or substantial hindrance of the provision of a planned bike lane or pedestrian facility on a roadway adjacent to the project site.
- The percentage or magnitude of increased traffic on the road due to the proposed project that may adversely affect pedestrian and bicycle safety.
- The physical conditions of the project site and surrounding area, such as curves, slopes, walls, landscaping or other barriers that may result in vehicle/pedestrian, vehicle/bicycle conflicts.
- Conformance of existing and proposed roads to the requirements of the private or public road standards, as applicable.
- The potential for a substantial increase in pedestrian or bicycle activity without the presence of adequate facilities.

Impact Analysis

The Cannabis Program does not propose any specific changes to roadways. Multiple federal, state, and local regulations exist to prevent transportation hazards from occurring within the county. Federal regulations pertaining to transportation, such as the American Disabilities Act, which ensures disabled populations are safely and adequately provided with transportation facilities, and the *Highway Capacity Manual*, which provides safety standards for transit throughout the nation. The Cannabis Program would also be required to comply with the existing County Zoning Ordinance Sections 6750–6799, the San Diego County Public Road Standards, the San Diego County Private Road Standards, and Title 7 of the County Regulatory Code, which provide guidance for roadway and transportation facility development in an effort to ensure a safe roadway system throughout the county. An encroachment permit under Section 71.602 of the Regulatory Code, an associated traffic control permit for construction activities, and a traffic control plan would also be required for commercial cannabis facilities making frontage or access improvements to minimize potential hazards during construction. Therefore, compliance with local and state standards and regulations would not result in substantially increased hazards due to a design feature or incompatible uses.

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 as well as expand their existing facilities and operations to a total of 10,000 square feet of building area for each site. However, no new cultivation or noncultivation activities would occur.

Potential expansion of uses under Alternative 1 would occur within the existing sites and would not result in any alteration of the existing transportation network and would not result in any physical changes to the existing environment and no creation of transportation hazards.

There would be no impact under Alternative 1.

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

Under Alternative 2, outdoor cultivation activities could occur on up to 472 acres of land, with a total of up to 1,772,120 sf (i.e., approximately 41 acres) of building area. Mixed-light cultivation

activities could occur on up to 293 acres of land, with a total of up to 668,184 sf (i.e., approximately 15 acres) of building area. Indoor cultivation activities could occur on up to 8 acres of land, with a total of up to 240,000 sf (i.e., approximately 5.5 acres) of building area. Noncultivation uses could occur on up to 259 acres of land, with a total of up to 2,030,400 sf (i.e., approximately 47 acres) of building area. This would result in a total development footprint (i.e., cultivation activities, buildings, caretaker housing, storage buildings, on-site nurseries, agricultural shade or crop structures, water tanks, ponds, parking, cannabis operation buildings, other associated improvements) of approximately 1,032 acres, with approximately 108 acres (4,710,704 sf) of building area for Alternative 2. Cannabis facilities would be required to observe a 600-foot buffer from certain state-defined sensitive uses, including schools, daycares, and youth centers.

As described above, the Cannabis Program does not propose any specific changes to roadways. Multiple federal, state, and local regulations exist to prevent transportation hazards from occurring within the county. This includes County Zoning Ordinance Sections 6750–6799, the San Diego County Public Road Standards, the San Diego County Private Road Standards, and Title 7 of the County Regulatory Code, which provide guidance for roadway and transportation facility development in an effort to ensure a safe roadway system throughout the county. An encroachment permit under Section 71.602 of the Regulatory Code, an associated traffic control permit for construction activities, and a traffic control plan would also be required for commercial cannabis facilities making frontage or access improvements to minimize potential hazards during construction. Therefore, compliance with local and state standards and regulations would not result in substantially increased hazards due to a design feature or incompatible uses.

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) and is the same as Alternative 2 described above. Alternative 3 additionally prohibits the development of cannabis facilities within 1,000 feet of sensitive uses, including other cannabis facilities. Advertising of cannabis on billboards would also be prohibited within 1,000 feet of sensitive uses.

Similar to Alternative 2, there are multiple federal, state, and local regulations to prevent transportation hazards from occurring within the county. This includes County Zoning Ordinance Sections 6750–6799, the San Diego County Public Road Standards, the San Diego County Private Road Standards, and Title 7 of the County Regulatory Code, which provide guidance for roadway and transportation facility development in an effort to ensure a safe roadway system throughout the county. An encroachment permit under Section 71.602 of the Regulatory Code, an associated traffic control permit for construction activities, and a traffic control plan would also be required for commercial cannabis facilities making frontage or access improvements to minimize potential hazards during construction. Therefore, compliance with local and state standards and regulations would not result in substantially increased hazards due to a design feature or incompatible uses.

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). This alternative would result in 2,002,524 sf of cannabis building area and 479 acres of land area dedicated to cannabis cultivation activity (whereas Alternatives 2, 3, and 5 would result in 2,680,304 sf of cannabis building area and 773 acres of land area dedicated to cannabis cultivation activity). Alternative 4 would allow mixed-light and indoor cannabis cultivation only when contained within a building. Alternative 4 additionally prohibits the development of cannabis facilities within 1,000 feet of sensitive uses, including other cannabis facilities. Advertising of cannabis on billboards would also be prohibited within 1,000 feet of sensitive uses.

Similar to Alternative 2, there are multiple federal, state, and local regulations to prevent transportation hazards from occurring within the county. This includes County Zoning Ordinance Sections 6750–6799, the San Diego County Public Road Standards, the San Diego County Private Road Standards, and Title 7 of the County Regulatory Code, which provide guidance for roadway and transportation facility development in an effort to ensure a safe roadway system throughout the county. An encroachment permit under Section 71.602 of the Regulatory Code, an associated traffic control permit for construction activities, and a traffic control plan would also be required for commercial cannabis facilities making frontage or access improvements to minimize potential hazards during construction. Therefore, compliance with local and state standards and regulations would not result in substantially increased hazards due to a design feature or incompatible uses.

This impact would be less than significant under Alternative 4.

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

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

Similar to Alternative 2, there are multiple federal, state, and local regulations to prevent transportation hazards from occurring within the county. This includes County Zoning Ordinance Sections 6750–6799, the San Diego County Public Road Standards, the San Diego County Private Road Standards, and Title 7 of the County Regulatory Code, which provide guidance for roadway and transportation facility development in an effort to ensure a safe roadway system throughout the county. An encroachment permit under Section 71.602 of the Regulatory Code, an associated traffic control permit for construction activities, and a traffic control plan would also be required for commercial cannabis facilities making frontage or access improvements to minimize potential hazards during construction. Therefore, compliance with local and state standards and regulations would not result in substantially increased hazards due to a design feature or incompatible uses.

This impact would be less than significant under Alternative 5.

2.16.3.7 Issue 4: Result in Inadequate Emergency Access

Guidelines for Determination of Significance

According to Appendix G of the State CEQA Guidelines and the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Transportation and Traffic* (County of San Diego 2011), the Cannabis Program would result in a significant impact if it would result in inadequate emergency access.

Impact Analysis

Commercial cannabis cultivation and noncultivation uses would be required to comply with the County's Zoning Ordinance Sections 6750–6799, San Diego County Public Road Standards, and San Diego County Private Road Standards, which provide guidance for roadway and transportation facility development and require sufficient emergency access in new development. In addition, the commercial cannabis sites would be required to comply with the San Diego County Consolidated Fire Code and the California Fire Code, which dictate minimum design standards for "Fire Apparatus Access Roads" and include minimum road standards, secondary access requirements, and restrictions for gated communities that are consistent with General Plan Policies M-4.4, S-2.7, and S-4.5.

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 as well as expand their existing facilities and operations to a total of 10,000 square feet of building area for each site. However, no new cultivation or noncultivation activities would occur.

Potential expansion of uses under Alternative 1 would occur within the existing sites and would not result in any alteration of the existing transportation network and not result in inadequate emergency access.

There would be no impact under Alternative 1.

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

Under Alternative 2, outdoor cultivation activities could occur on up to 472 acres of land, with a total of up to 1,772,120 sf (i.e., approximately 41 acres) of building area. Mixed-light cultivation activities could occur on up to 293 acres of land, with a total of up to 668,184 sf (i.e., approximately 15 acres) of building area. Indoor cultivation activities could occur on up to 8 acres of land, with a total of up to 240,000 sf (i.e., approximately 5.5 acres) of building area. Noncultivation uses could occur on up to 259 acres of land, with a total of up to 2,030,400 sf (i.e., approximately 47 acres) of building area. This would result in a total development footprint (i.e., cultivation activities, buildings, caretaker housing, storage buildings, on-site nurseries, agricultural shade or crop structures, water tanks, ponds, parking, cannabis operation buildings, other associated improvements) of approximately 1,032 acres, with approximately 108 acres (4,710,704 sf) of building area for Alternative 2. Cannabis facilities would be required to observe a 600-foot buffer from certain state-defined sensitive uses, including schools, daycares, and youth centers.

As described above, commercial cannabis cultivation and noncultivation uses under Alternative 2 would be required to comply with the County's Zoning Ordinance Sections 6750–6799, San Diego County Public Road Standards, and San Diego County Private Road Standards, which provide guidance for roadway and transportation facility development and require sufficient emergency access in new development. In addition, the commercial cannabis sites would be required to comply with the San Diego County Consolidated Fire Code and the California Fire Code, which dictate minimum design standards for "Fire Apparatus Access Roads" and include minimum road standards, secondary access requirements, and restrictions for gated communities.

Therefore, due to the required adherence to local and state emergency access design standards and regulations, future commercial cannabis facilities would not result in inadequate emergency vehicle access.

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) and is the same as Alternative 2 described above. Alternative 3 additionally prohibits the development of cannabis facilities within 1,000 feet of sensitive uses, including other cannabis facilities. Advertising of cannabis on billboards would also be prohibited within 1,000 feet of sensitive uses.

Similar to Alternative 2, commercial cannabis cultivation and noncultivation uses under Alternative 3 would be required to comply with the County's Zoning Ordinance Sections 6750–6799, San Diego County Public Road Standards, and San Diego County Private Road Standards, which provide guidance for roadway and transportation facility development and require sufficient emergency access in new development. In addition, the commercial cannabis sites would be required to comply with the San Diego County Consolidated Fire Code and the California Fire Code that address emergency access. Therefore, compliance local and state emergency access design standards and regulations, future commercial cannabis facilities would not result in inadequate emergency access.

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). This alternative would result in 2,002,524 sf of cannabis building area and 479 acres of land area dedicated to cannabis cultivation activity (whereas Alternatives 2, 3, and 5 would result in 2,680,304 sf of cannabis building area and 773 acres of land area dedicated to cannabis cultivation activity). Alternative 4 would allow mixed-light and indoor cannabis cultivation only when contained within a building. Alternative 4 additionally prohibits the development of cannabis facilities within 1,000 feet of sensitive uses, including other cannabis facilities. Advertising of cannabis on billboards would also be prohibited within 1,000 feet of sensitive uses.

Similar to Alternative 2, commercial cannabis cultivation and noncultivation uses under Alternative 4 would be required to comply with the County's Zoning Ordinance Sections 6750–6799, San Diego County Public Road Standards, and San Diego County Private Road Standards, which provide guidance for roadway and transportation facility development and require sufficient emergency access in new development. In addition, the commercial cannabis sites would be required to comply with the San Diego County Consolidated Fire Code and the California Fire Code, which address emergency access. Therefore, through compliance with local and state emergency access design standards and regulations, future commercial cannabis facilities would not result in inadequate emergency access.

This impact would be less than significant under Alternative 4.

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

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

Similar to Alternative 2, commercial cannabis cultivation and noncultivation uses under Alternative 5 would be required to comply with the County's Zoning Ordinance Sections 6750–6799, San Diego County Public Road Standards, and San Diego County Private Road Standards, which provide guidance for roadway and transportation facility development and require sufficient emergency access in new development. In addition, the commercial cannabis sites would be required to comply with the San Diego County Consolidated Fire Code and the California Fire Code, which address emergency access. Therefore, through compliance with local and state emergency access design standards and regulations, future commercial cannabis facilities would not result in inadequate emergency access.

This impact would be less than significant under Alternative 5.

2.16.4 Cumulative Impacts

The cumulative impact analysis for transportation includes the unincorporated area of the county and the surrounding jurisdictions as proposed in the General Plan. The cumulative environmental setting is based on the development forecasts in SANDAG's 2021 Regional Plan (SANDAG 2021). Therefore, the study area for this cumulative transportation impact analysis is the SANDAG region, which encompasses the unincorporated areas and 18 incorporated cities that make up the entire county.

2.16.4.1 Issue 1: Conflict with a Program, Plan, Ordinance, or Policy Addressing the Circulation System

The San Diego County General Plan Update Draft EIR identified no cumulatively considerable impacts associated with conflicts programs, plans, ordinances, or policies

addressing transportation and circulation from implementation of the General Plan (County of San Diego 2009).

Alternative 1 would not result in any changes to existing transportation systems; thus, there would be no contribution to cumulative impacts related to conflicts with transportation and circulation plans and programs. Commercial cannabis facilities under Alternatives 2, 3, 4, and 5 would be required to meet all County requirements related to construction, including the County Public Road Standards and Title 7 of the County Regulatory Code. Section 6 of the Public Road Standards details design standards for roadways, and Section 7 establishes bikeway requirements and design standards. An encroachment permit under Section 71.602 of the Regulatory Code, an associated traffic control permit for construction activities, and a traffic control plan would also be required for commercial cannabis facilities making frontage or access improvements. In addition, the proposed Cannabis Program includes amendments to the County Zoning Ordinance and Regulatory Code, identified above, to address bicycle and pedestrian uses. Compliance with County standards and proposed amendments to the County Zoning Ordinance and Regulatory Code to address bicycle and pedestrian uses would offset Cannabis Program contributions to cumulative impacts. In addition, subsequent projects would be required to be consistent with the County General Plan policies. If subsequent projects would result in physical alterations to the public right-of-way, Policy M-3.1 would require project applicants to provide sufficient right-of-way to accommodate active modes of transportation. Policy M-3.2 would be implemented prior to a subsequent project's permit approval. In addition, the design and safety regulations prescribed by Policies M-3.3, M-4.3, M-4.4, M-2.7, and M-4.5 would need to be met for each project's permit approval. Therefore, the contribution to cumulative impacts associated with conflicts with programs, plans, ordinances, or policies addressing transportation and circulation would be less than cumulatively considerable under Alternatives 2, 3, 4, and 5.

2.16.4.2 Issue 2: Exceed the Threshold for VMT

The San Diego County General Plan Update EIR did not address VMT because this transportation analysis requirement under CEQA was not in effect until 2020.

Potential expansion of the existing 5 sites under Alternative 1 would be below the VMT screening thresholds identified in Table 3.16.3 and not contribute to cumulative VMT impacts. Individual commercial cannabis cultivation and noncultivation sites under the Cannabis Program for Alternatives 2, 3, 4, and 5 could potentially be screened out from conducting a VMT analysis and presumably have a less-than-significant VMT impact based on the County's established guidelines. However, there is a possibility that new cannabis facilities would not meet any of the screening criteria; thus, their associated VMT output may exceed the allowable threshold identified by the County and create or contribute to cumulative VMT impacts in the county. Therefore, the contribution to cumulative VMT impacts would be cumulatively considerable under Alternatives 2, 3, 4, and 5.

2.16.4.3 Issue 3: Substantially Increase Hazards due to a Design Feature

The San Diego County General Plan Update Draft EIR identified cumulatively considerable impacts associated with rural roadway safety from implementation of the General Plan (County of San Diego 2009).

Alternative 1 would not result in any changes to the existing roadway network; thus, there would be no contribution to cumulative impacts related to transportation hazards. Alternatives 2, 3, 4, and 5 of the Cannabis Program do not propose any specific changes to roadways. Multiple federal, state, and local regulations exist to prevent transportation hazards from occurring within the county. This includes County Zoning Ordinance Sections 6750–6799, the San Diego County Public Road Standards, the San Diego County Private Road Standards, and Title 7 of the County Regulatory Code, which provide guidance for roadway and transportation facility development in an effort to ensure a safe roadway system throughout the county. An encroachment permit under Section 71.602 of the Regulatory Code, an associated traffic control permit for construction activities, and a traffic control plan would also be required for commercial cannabis facilities making frontage or access improvements to minimize potential hazards during construction. Compliance with County, state, federal roadway safety standards would offset Cannabis Program contributions to cumulative impacts regarding roadway safety. Therefore, the contribution to cumulative impacts associated with transportation hazards would be less than cumulatively considerable under Alternatives 2, 3, 4, and 5.

2.16.4.4 *Issue 4: Result in Inadequate Emergency Access*

The San Diego County General Plan Update Draft EIR identified no cumulatively considerable impacts associated with emergency access from implementation of the General Plan (County of San Diego 2009).

Alternative 1 would not result in any changes to the existing roadway network; thus, there would be no contribution to cumulative impacts related to emergency access. Commercial cannabis facilities under Alternatives 2, 3, 4, and 5 of the Cannabis Program would be required to comply with the County's Zoning Ordinance Sections 6750–6799, San Diego County Public Road Standards, and San Diego County Private Road Standards, which provide guidance for roadway and transportation facility development and require sufficient emergency access in new development. In addition, the commercial cannabis sites would be required to comply with the San Diego County Consolidated Fire Code and the California Fire Code, which dictate minimum design standards for "Fire Apparatus Access Roads" and include minimum road standards, secondary access requirements and restrictions for gated communities. Compliance with County and state emergency access standards would offset Cannabis Program contributions to cumulative impacts involving emergency access. Therefore, the contribution to cumulative impacts associated with emergency access would be less than cumulatively considerable under Alternatives 2, 3, 4, and 5.

2.16.5 Significance of Impact Prior to Mitigation

2.16.5.1 *Issue 1: Conflict with a Program, Plan, Ordinance, or Policy Addressing the Circulation System*

The Cannabis Program would not conflict with transportation and circulation plans or programs under Alternative 1. The proposed Cannabis Program would result in less than significant direct and cumulative impacts to transportation and circulation plans and programs under Alternatives 2 through 5.

2.16.5.2 Issue 2: Exceed the Threshold for VMT

The Cannabis Program would have no direct significant impacts to transportation under Alternative 1. The proposed Cannabis Program would result in a significant direct and cumulative VMT impacts under Alternatives 2 through 5.

2.16.5.3 Issue 3: Substantially Increase Hazards due to a Design Feature

The Cannabis Program would have no direct impacts to transportation safety under Alternative 1. The proposed Cannabis Program would result in less than significant direct and cumulative impacts to transportation safety under Alternatives 2 through 5.

2.16.5.4 Issue 4: Result in Inadequate Emergency Access

The Cannabis Program would have no direct impacts to emergency access under Alternative 1. The proposed Cannabis Program would result in less than significant direct and cumulative impacts to emergency access under Alternatives 2 through 5.

2.16.6 Mitigation

2.16.6.1 Issue 1: Conflict with a Program, Plan, Ordinance, or Policy Addressing the Circulation System

No mitigation is required.

2.16.6.2 Issue 2: Exceed the Threshold for VMT

No mitigation is required for Alternative 1.

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

M-TR.2-1: Conduct VMT Analysis and Identify VMT Impacts

Applications for cannabis facilities shall demonstrate whether the proposed cannabis facility would meet the screening criteria outlined in the *County of San Diego Transportation Study Guidelines, January 2026*, or any subsequent updates to these guidelines, or other State or County regulations that provide clear standards for screening from VMT analysis requirements. Applications that meet objective screening criteria approved by the County shall not require further VMT analysis.

If the proposed commercial cannabis facility does not meet any of the objective screening criteria, the applicant shall submit a project-level VMT analysis prepared by a consultant listed on the *County of San Diego's CEQA Consultants List for Privately Initiated Projects*. The analysis must identify VMT impacts associated with the cannabis facility and determine the significance of project impacts or provide substantial evidence to support a less than significant finding. If project impacts are significant, the project applicant shall reduce project-induced VMT impacts to the extent feasible through implementation of VMT-reducing infrastructure and/or strategies, such as Transportation Demand Management (TDM), or other measures acceptable to the County. TDM measures may include strategies such as ridesharing

initiatives (e.g., carpooling), promoting alternative work schedules and telework, subsidizing employee use of public transit, and promoting bicycling, walking, and the use of public transit. The proposed mitigation is subject to the County's review and approval, and no development shall proceed until the County determines the proposed mitigation is acceptable.

2.16.6.3 Issue 3: Substantially Increase Hazards due to a Design Feature

No mitigation is required.

2.16.6.4 Issue 4: Result in Inadequate Emergency Access

No mitigation is required.

2.16.7 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 the mitigation measure is implemented.

2.16.7.1 Issue 1: Conflict with a Program, Plan, Ordinance, or Policy Addressing the Circulation System

Alternative 1 does not propose any physical changes to the existing roadway network and would not change or conflict with any adopted transportation policies, plans, or programs. Implementation of the Cannabis Program under Alternatives 2 through 5 would be required to meet all County requirements related to construction, including the County Public Road Standards and Title 7 of the County Regulatory Code. Section 6 of the Public Road Standards details design standards for roadways, and Section 7 establishes bikeway requirements and design standards. An encroachment permit under Section 71.602 of the Regulatory Code, an associated traffic control permit for construction activities, and a traffic control plan would also be required for commercial cannabis facilities making frontage or access improvements. In addition, the proposed Cannabis Program includes amendments to the County Zoning Ordinance and Regulatory Code, identified above, to address bicycle and pedestrian uses. Therefore, the direct impact would be less than significant and would not result in a considerable contribution to a significant cumulative impact on programs, plans, ordinances, or policies addressing the circulation system under Alternatives 2 through 5.

2.16.7.2 Issue 2: Exceed the Threshold for VMT

Potential expansion of the existing 5 sites under Alternative 1 would not result in significant VMT impacts. Implementation of the Cannabis Program under Alternatives 2 through 5 would provide a framework for the permitting and licensing of new commercial cannabis facilities in some areas of the unincorporated county that could result in a VMT that exceeds the allowable threshold, if not screened out based on the thresholds identified in Table 2.16.2, presented below. Implementation of Mitigation Measure M-TR.2-1 would require measures to reduce commercial cannabis facility VMT that exceed the thresholds. However, it is currently not known at the programmatic level whether all future commercial cannabis facilities could be mitigated to a less-than-significant level due to the lack of details on sizing, location, and related land uses. Without project-level details, it is not possible to determine if all subsequent

projects would screen out from a detailed VMT analysis or result in project-generated VMT that is below the applicable threshold. In addition, although implementation of Mitigation Measure M-TR.2-1 would require subsequent project applicants to develop a TDM Plan and implement VMT-reducing strategies, it cannot be guaranteed to what extent people would participate in the TDM Program and choose to use alternative modes of transportation. Therefore, because it is not known to what extent subsequent project VMT may exceed the applicable threshold and how effective Mitigation Measure M-TR.2-1 would be at reducing impacts to below a less-than-significant level, the implementation of the Cannabis Program under Alternatives 2 through 5 could have a direct and cumulative significant and unavoidable VMT impact.

2.16.7.3 Issue 3: Substantially Increase Hazards due to a Design Feature

Alternative 1 does not propose any physical changes to the existing roadway network and therefore, would not create or increase a transportation hazard. Implementation of the Cannabis Program under Alternatives 2 through 5 would be subject to regulations that address transportation hazards. This includes County Zoning Ordinance Sections 6750–6799, the San Diego County Public Road Standards, the San Diego County Private Road Standards, and Title 7 of the County Regulatory Code, which provide guidance for roadway and transportation facility development in an effort to ensure a safe roadway system throughout the county. An encroachment permit under Section 71.602 of the Regulatory Code, an associated traffic control permit for construction activities, and a traffic control plan would also be required for commercial cannabis facilities making frontage or access improvements to minimize potential hazards during construction. Therefore, the direct impact would be less than significant under Alternatives 2 through 5, and this impact would not result in a considerable contribution to a significant cumulative impact on increasing hazards due to a design feature.

2.16.7.4 Issue 4: Result in Inadequate Emergency Access

Alternative 1 does not propose any physical changes to the existing roadway network and therefore, would not result in inadequate emergency vehicle access. Implementation of the Cannabis Program under Alternatives 2 through 5 would be required to comply with the County's Zoning Ordinance Sections 6750–6799, San Diego County Public Road Standards, and San Diego County Private Road Standards, which provide guidance for roadway and transportation facility development and require sufficient emergency access in new development. In addition, the commercial cannabis sites would be required to comply with the San Diego County Consolidated Fire Code and the California Fire Code, which dictate minimum design standards for "Fire Apparatus Access Roads" and include minimum road standards, secondary access requirements, and restrictions for gated communities. Therefore, the direct impact would be less than significant under Alternatives 2 through 5, and this impact would not result in a considerable contribution to a significant cumulative impact on inadequate emergency access.

Table 2.16.2 Project VMT Screening Criteria Summary

VMT Screening Criteria	Applicable Project Component	Screening Threshold
Projects Located in a VMT Efficient Area, and/or Transit Accessible Area	Cultivation Operations Processing Testing Activities Manufacturing Activities Distribution Activities Retail Activities	County VMT Mapping Data
Locally Serving Retail Projects	Retail Activities	< 50,000 SF

Note: sf = square feet.

¹ Indoor cultivation includes the building size of any structural facility.

Source: Data provided by Intersecting Metrics in 2024.