2.19 Wildfire

This section describes the existing conditions for wildfire in the unincorporated county; identifies the applicable federal, state, and local regulations governing wildfire; and evaluates the potential for the proposed Cannabis Program to exacerbate wildfire risk and expose people or structures to post-fire risk. The potential for the Cannabis Program to impair emergency response and evacuation is addressed in Section 2.10, "Hazards and Hazardous Materials."

During the notice of preparation (NOP) scoping process, the County received comments regarding wildfire from organizations and individuals. The comments pertained to wildfire risk from burying and burning waste on grow sites, the flammability of the extraction process for oils and other products and requests to prohibit these activities in agricultural zones, and extreme wildfire risk in the Warner Springs community. A copy of the NOP and comment letters received in response to the NOP are included in Appendix A of this PEIR.

Table 2.19.1 summarizes the potential wildfire impacts of the proposed Cannabis Program.

Table 2.19.1 Wildfire Summary of Impacts

Issue Number	Issue Topic	Project Direct Impact	Project Cumulative Impact	Impact after Mitigation
1	Increase the Risk of Wildland Fire Ignition	Alternatives 1–5: Less than Significant	Alternatives 1–5: Less than Significant	Alternatives 1–5: Less than Significant
2	Exacerbate Wildfire Risks Due to Slope, Prevailing Winds, and Other Factors	Alternatives 1–5: Less than Significant	Alternatives 1–5: Less than Significant	Alternatives 1–5: Less than Significant
3	Install Infrastructure That Exacerbates Fire Risk	Alternatives 1–5: Less than Significant	Alternatives 1–5: Less than Significant	Alternatives 1–5: Less than Significant
4	Expose People or Structures to Post-Fire Risks	Alternatives 1–5: Less than Significant	Alternatives 1–5: Less than Significant	Alternatives 1–5: Less than Significant

2.19.1 Existing Conditions

2.19.1.1 *Wildfire Behavior and Controlling Factors*

Wildfire behavior is a product of several variables—primarily weather, vegetation, topography, and human influences—which intermix to produce local and regional fire regimes that affect how, when, and where fires burn. The fire regime in any area is defined by several factors, including fire frequency, intensity, severity, and area burned. Each of these are important for understanding how the variables that affect fire behavior produce fire risks. Fire frequency refers to the number of fires that occur in a particular area over a given period of time, fire intensity refers to the speed at which fire travels and the heat that it produces, fire severity involves the extent to which ecosystems and existing conditions are affected or changed by a fire, and area burned is the size of the area burned by wildfire.

Human Influence on Wildfire

Human influence on wildfire is broad and can be substantial. It includes direct influences, such as the ignition and suppression of fires, and indirect influences through climate change and alterations in land use patterns that support modified vegetative regimes and increased development in the wildland-urban interface (WUI), which are areas where development is located close to open space or lands with native vegetation and habitat prone to brush fires (refer to “Climate Change and Wildfire” below for further discussion on the indirect effect of climate change on wildfire).

Anthropogenic influence more directly controls fire frequency (i.e., number of ignitions) than size of a burn because humans are responsible for most wildfire ignitions. Once started, fire spread and behavior become a function of fuel characteristics, terrain, and weather conditions (Syphard et al. 2008). Human-induced wildfire ignitions can change fire regime characteristics in two ways: (1) changing the distribution and density of ignitions, and (2) changing the seasonality of burning activity (Balch et al. 2017). A study of wildfires across the United States for the 20-year period between 1992 and 2012 showed that 82 percent of wildfires during that period were started by human causes (Balch et al. 2017), whereas in California specifically, humans accounted for starting approximately 95 percent of wildfires (Syphard et al. 2007; Syphard and Keeley 2015). In 2022, more than half of all fires in California were caused by humans, and when miscellaneous and undetermined causes are included, that figure increases to 97 percent (CAL FIRE 2022).

Human ignitions include a multitude of sources, including escapes from debris and brush-clearing fires, electrical equipment malfunctions, campfire escapes, smoking, fire play (e.g., fireworks), vehicles, and arson. Consequently, areas near human development, especially in the WUI or in areas near campgrounds and roads, generate fires at a more frequent rate than very remote or urban areas (Syphard et al. 2007; Mann et al. 2016; Balch et al. 2017). Circumstances in California have made the environment particularly vulnerable to human-caused fires with expansion of the WUI and introduction of more people in areas susceptible to wildfire at all times of the year. A 2018 study indicates that the number of houses in the WUI increased nationwide by 41 percent between 1990 and 2010 (Radeloff et al. 2018).

Climate Change and Wildfire

Wildfires are a significant threat in California, particularly in recent years as the landscape responds to climate change and decades of fire suppression. It is estimated that since 1985, more than 50 percent of the increase in the area burned by wildfire in the western United States is attributable to anthropogenic climate change (Abatzoglou and Williams 2016). As climate change persists, it will produce increasing temperatures and drier conditions that will generate abundant dry fuels. All wildfires (those initiated by both natural and human-made sources) tend to be larger under drier atmospheric conditions and when fed by drier fuel sources (Balch et al. 2017).

In addition, climate change has led to exacerbation of wildfire conditions during a longer period of the year as the spring season has warmed—driving an earlier spring snowmelt—and as winter precipitation has overall decreased. Furthermore, wildfire activity is closely related to temperature and drought conditions, and in recent decades, increasing drought frequency and warming temperatures have led to an increase in wildfire activity (Schoennagel et al. 2017). In particular, the western United States, including California, has seen increases in wildfire

activity in terms of area burned, number of large fires, and fire season length (Abatzoglou and Williams 2016). These conditions have resulted in the largest, most destructive, and deadliest wildfires on record in California's history, several of which occurred in 2018, including the Camp Fire and Mendocino Complex. Nine of the state's 10 largest wildfires have occurred since 2003 (CAL FIRE 2019a).

Human Health Effects of Wildfire

In addition to vegetation and structural loss, wildfires also affect public health. Fire-related injuries and deaths are likely to increase as wildfires occur more frequently. Wildfires can also be a significant contributor to air pollution. Wildfire smoke contains numerous toxic and hazardous pollutants that are dangerous to breathe and can worsen lung disease and other respiratory conditions (County of San Diego 2023a). Exposure to particulate matter generated by wildfire events can result in significant health problems, including aggravated asthma, increased susceptibility to respiratory infections, and heart attacks and arrhythmias in people with heart disease (Sacramento Metropolitan Air Quality Management District 2019).

2.19.1.2 *Wildfire History in the Unincorporated County*

The unincorporated county has a long history of wildland fires. San Diego County's worst wildfire occurred in October 2007. The fire started on October 21, 2007, near the United States–Mexico International Border and burned throughout the county until the last fire was fully contained on November 9, 2007. At the height of the fire event, there were 7 fires burning in San Diego County. The fires destroyed 369,000 acres (13 percent of the county), 2,670 structures, 239 vehicles, and 2 commercial properties. There were 10 civilian deaths, 23 civilian injuries, and 10 firefighter injuries. The cost of fire damage exceeded $1.5 billion. In October 2003, the second-worst wildfire in the history of San Diego County destroyed 332,766 acres of land and 3,239 structures and caused 17 deaths at a cost of approximately $450 million. San Diego County's third worst wildfire in history, known as the Laguna Fire, resulted in the loss or destruction of 383 homes and 1,200 other structures (County of San Diego 2023a).

More recently, the 2018 West Fire burned 505 acres within the county, and the 2020 Valley Fire burned 76,067 acres within the county. In addition, the 2020 Valley Fire, which was located outside the community of Alpine, burned 76,067 acres and damaged or destroyed 75 structures. This fire was intensified by dry vegetation, rugged terrain, and high temperatures and winds. Eleven wildfire incidents occurred in the county in 2021 (totaling 9,082 acres) and 10 wildfire incidents occurred in 2022 (totaling 5,609 acres) (CAL FIRE 2023a, 2023b).

Wildland fires prompted 7 proclaimed states of emergency, and urban/intermix fires prompted 4 proclaimed states of emergency in San Diego County between 1950 and 2020 (County of San Diego 2023a). Table 2.19.2, which is presented at the end of this section, provides an overview of the major wildfires with burn areas greater than 4,000 acres that have occurred over the past 20 years in San Diego County.

Common causes of wildfire in San Diego County include equipment use, vehicle fires spreading into wildlands, accidental starts from warming or debris fires, and arson. As presented in Table 2.19.3, presented at the end of this section, the predominant cause of wildfire changes from year to year in the state responsibility area (SRA) within both San Diego County and in the state. When considered over the period of 2019 through 2023 and excluding

miscellaneous and undetermined causes, the majority of the fires in the state were caused by debris burning, followed by vehicles and equipment use, whereas the majority of fires within San Diego County (approximately 59 percent) were caused by vehicles followed by equipment use and arson.

2.19.1.3 *Wildfire Conditions in the Unincorporated County*

San Diego County's topography consists of a semiarid coastal plain and rolling highlands which, when fueled by shrub overgrowth, occasional Santa Ana winds, and high temperatures, creates an ever-present threat of wildland fire. Extreme weather conditions, such as high temperature, low humidity, or winds of extraordinary force, may cause an ordinary fire to expand into one of massive proportions. Under current climate conditions, the wildfire threat to property, lives, and ecosystems in the San Diego region is very high. With hotter temperatures and possibly fewer rainy days in the coming decades, vegetation could become drier. As a result, it is likely that the San Diego region will see an increase in the frequency and intensity of fires, making the region more vulnerable to devastating fires like the ones seen in 2003 and 2007. The fire season could also become longer and less predictable, making firefighting efforts more costly (County of San Diego 2023a).

From May to October of each year, San Diego County faces a severe wildfire threat. Fires will continue to occur on an almost annual basis in San Diego County. The threat of wildfire and potential losses consistently increase as human development and population increase in the WUI areas in the county. According to the California Department of Forestry and Fire Protection (CAL FIRE) Redbook, there have been 1,113 wildfires recorded for San Diego County between 2015 and 2021. According to climate and weather in San Diego County and the fuels, topography, and past fire history, the CAL FIRE Redbook indicates an average of 159 wildfires per year in the county (County of San Diego 2023a).

CAL FIRE designates fire hazard severity zones (FHSZs) at the federal, state, and local levels throughout the state, which are mapped as part of its Fire and Resource Assessment Program (FRAP). These areas are mapped based on fuels, terrain, weather, and other relevant factors and assigned a classification, such as Moderate, High, or Very High. CAL FIRE released updated maps of FHSZs within SRAs for public comment in 2022. These maps show an overall reduction in lands within High FHSZs and an increase in lands within the Very High FHSZ designation in the unincorporated county. These designations have been adopted and became effective on April 1, 2024. The majority of the unincorporated county is within an SRA and is classified as a High or Very High FHSZ, except for the desert and eastern mountain empire subregions, which are designated as a Moderate FHSZ (CAL FIRE 2022). Figure 2.19.1, presented at the end of this section, shows the areas designated as Moderate, High, and Very High FHSZs in the unincorporated county, and the associated acreages of each designation are provided in Table 2.19.2, which is presented at the end of this section.

The unincorporated county also includes several areas within the WUI. The WUI creates an environment in which fire can move readily between structural and vegetation fuels. Once homes are built within (or adjacent to) natural habitat settings, the complexity of fighting wildland fires increases because the goal of extinguishing the wildland fire is often superseded by protecting human life and private property.

A WUI is defined as a zone around areas of residential density greater than 0.05 dwelling units per acre and is divided into a Defense Zone (the area up to 0.25 miles from the developed area) and a Threat Zone (from 0.25 to 1.5 miles from developed areas) (CAL FIRE 2018). WUI communities are created when the following conditions occur: (1) structures are built at densities greater than 1 unit per 40 acres, (2) the percentage of native vegetation is less than 50 percent, (3) the area is more than 75 percent vegetated, and (4) the area is within 1.5 miles of an area greater than a census block (1,325 acres). The 1.5-mile buffer distance was adopted according to the 2001 California Fire Alliance definition of "vicinity," which is roughly the distance that pieces of burning wood can be carried from wildland fire to the roof of a structure (Stewart et al. 2007). Approximately 575,434 acres of the unincorporated county are within the WUI (County of San Diego 2011). In addition, the California Public Utilities Commission (CPUC) maintains a High Fire Threat District (HFTD) Map. The CPUC HFTD Map (CPUC 2018) includes 3 fire-threat areas:

- Tier 3 consists of areas on the CPUC Fire-Threat Map where there is an extreme risk from wildfires associated with overhead utility power lines or overhead utility power-line facilities also supporting communication facilities.
- Tier 2 consists of areas on the CPUC Fire-Threat Map where there is an elevated risk from wildfires associated with overhead utility power lines or overhead utility power-line facilities also supporting communication facilities.
- Zone 1 consists of Tier 1 High-Hazard Zones (HHZs) from the US Forest Service (USFS) and CAL FIRE joint map of Tree Mortality HHZs. Tier 1 HHZs are in direct proximity to communities, roads, and utility lines, and are a direct threat to public safety.

2.19.1.4 *Wildfire Protection and Response*

Wildfire protection and response in California is the responsibility of either the federal, state, or local government. On federally owned land, or federal responsibility areas (FRAs), fire protection is provided by the federal government, often in partnership with local grants and contracts. Within San Diego County, the Cleveland National Forest is within FRAs and is under the responsibility of the US Forest Service (USFS). In SRAs, CAL FIRE has a legal responsibility to provide fire protection. In San Diego County, local fire protection is provided by Fire Protection Districts and County Service Areas (CSAs) in unincorporated areas and by city fire departments and joint powers agreements within city boundaries. Additional discussion of the fire protection agencies serving the unincorporated county is provided in Section 2.15, "Public Services."

2.19.2 Regulatory Framework

2.19.2.1 *Federal*

No federal plans, policies, regulations, or laws related to wildfire are applicable to the proposed Cannabis Program.

2.19.2.2 *State*

Office of the State Fire Marshal and California Department of Forestry and Fire Protection

The Office of the State Fire Marshal evaluates and provides technical assistance for the hazardous material management plan, the hazardous materials inventory statement, and the Aboveground Petroleum Storage Act Programs. The hazardous materials management plan and inventory statement are closely tied to the Business Plan Program, which requires qualifying businesses to prepare a Hazardous Materials Business Plan that includes hazardous materials and hazardous waste management procedures and emergency response procedures, including emergency spill cleanup supplies and equipment (see Section 2.10, "Hazards and Hazardous Materials," for additional details).

CAL FIRE is dedicated to the fire protection and stewardship of over 31 million acres of the state's privately owned wildlands. Public Resources Code (PRC) Sections 4125–4137 establish that CAL FIRE has the primary financial responsibility of preventing and suppressing fires in SRAs. PRC Section 4290 states that CAL FIRE also has responsibility for enforcement of Fire Safe Standards, including road standards for fire equipment access; standards for signs identifying streets, roads, and buildings; minimum private water supply reserves for emergency fire use; fuel breaks; and greenbelts. PRC Section 4291 gives CAL FIRE the authority to enforce 100 feet of defensible space around all buildings and structures on SRA lands and nonfederal forest-covered lands, brush-covered lands, grass-covered lands, or any land that is covered with flammable material.

In addition, CAL FIRE is also responsible for a broad range of programs that guide forest policy and planning within California and for implementing the FRAP. The FRAP assesses the amount and extent of California's forests and rangelands, analyzes their conditions, and identifies alternative management and policy guidelines. FHSZs for community planning are developed under the FRAP and identify areas with very high fire hazards in both the SRA and local responsibility area (LRA).

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

- Determination that new subdivisions are consistent with regulations adopted by the State Board of Forestry and Fire Protection pursuant to PRC Sections 4290 and 4291 or are consistent with local ordinances certified by the State Board of Forestry and Fire Protection as meeting or exceeding the state regulations (California Code of Regulations [CCR], Title 14, Section 1266.01)
- Defensible space of 100 feet around all buildings and structures (PRC Section 4291; CCR, Title 14, Section 1299.03)
- Provision of adequate emergency access and egress (PRC Sections 4290 and 4291; CCR, Title 14, Sections 1273.01–1273.09)
- Emergency water requirements (CCR, Title 14, Sections 1275.01–1275.04)
- Building signing and number requirements (PRC Sections 4290 and 4291; CCR, Title 14, Sections 1274.01–1274.04)

Strategic Plan for California

The 2019 Strategic Plan prepared by CAL FIRE and the California Natural Resources Agency lays out central goals for reducing and preventing the impacts of fire in the state (CAL FIRE 2019a). The goals are meant to establish, through local, state, federal, and private partnerships, a natural environment that is more resilient and human-made assets that are more resistant to the occurrence and effects of wildland fire. The goals of the 2019 Strategic Plan include improving core capabilities; enhancing internal operations; ensuring health and safety; and building an engaged, motivated, and innovative workforce. CAL FIRE is currently in the process of developing a 2024 Strategic Plan that builds on the goals and objectives of the 2019 Strategic Plan; however, the updated plan has not yet been adopted at the time of this PEIR.

In addition to the 2019 Strategic Plan, individual CAL FIRE units develop fire plans, which are major strategic documents that establish a set of tools for each CAL FIRE unit for its local area. Updated annually, unit fire plans identify wildfire protection areas, initial attack success, assets and infrastructure at risk, pre-fire management strategies, and accountability within their unit's geographical boundaries. The unit fire plan identifies strategic areas for pre-fire planning and fuel treatment as defined by the people who live and work locally. The plans include contributions from local collaborators and interested parties and are aligned with other plans for the area.

Public Resources Code Section 4427

PRC Section 4427 includes fire safety statutes that restrict the use of equipment that may produce a spark, flame, or fire; require the use of spark arrestors on construction equipment with internal combustion engines; specify requirements for the safe use of gasoline-powered tools in fire hazard areas; and specify fire suppression equipment that must be provided on-site for various types of work in fire-prone areas.

California Building Code

The California Building Code (CBC) (CCR Title 24) provides minimum standards for the design and construction of buildings and structures in California. Minimum standards are organized under Part 1 to Part 12 and include code standards for buildings, mechanical, plumbing, energy, historical buildings, fire safety, and green building standards. State law mandates that local government enforce these regulations, or local ordinances, with qualified reasonably necessary and generally more restrictive building standards than provided in the CBC. Title 24 is applicable to all occupancies, or structures, throughout California, whether or not the local government takes an affirmative action to adopt Title 24.

Chapter 7A of the CBC includes standards for building materials, systems, and assemblies used in the exterior design and construction of new buildings located within any FHSZ or any WUI area to prevent the intrusion of flames and embers. Chapter 7A applies to all new buildings with residential, commercial, educational, institutional, or similar occupancy type use. Within CBC Chapter 7A, Section 701A.3 (New Buildings Located in Any Fire Hazard Severity Zone) requires that new buildings located in any FHSZ or WUI fire area designated by the enforcing agency comply with all the requirements of Chapter 7A. These requirements include the following conditions:

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

California Fire Code

The California Fire Code (CFC) (CCR, Title 24, Part 9) establishes the minimum requirements consistent with nationally recognized good practices for providing life safety and property protection from the hazards of fire, explosion, and dangerous conditions in new and existing buildings, structures, and premises and providing safety and assistance to firefighters and emergency responders during emergency situations. The CFC specifies fire-resistant ratings for building materials and finishes, installation of sprinklers, use and storage of hazardous and flammable materials, and means of egress. Many local jurisdictions have adopted the CFC as part of their local codes.

Assembly Bill 747

Assembly Bill (AB) 747 was enacted on October 19, 2019, and required jurisdictions, upon the next revision of a local hazard mitigation plan on or after January 1, 2022, or beginning on or before January 1, 2022, if a local jurisdiction has not adopted a local hazard mitigation plan, to review and update their General Plan Safety Element to identify evacuation routes and their capacity, safety, and viability under a range of emergency scenarios. AB 747 also allows cities and counties with an adopted local hazard mitigation plan, emergency operations plan, or other document that fulfills commensurate goals and objectives to summarize and incorporate by reference that information in their Safety Element to comply with the bill.

State of California Emergency Plan

The State of California Emergency Plan (Emergency Plan) was prepared to describe how state government mobilizes and responds to emergencies and disasters in coordination with partners in all levels of government, the private sector, nonprofits, and community-based organizations. The Emergency Plan also works in conjunction with the California Emergency Services Act and outlines a robust program of emergency preparedness, response, recovery, and mitigation for all hazards, both natural and human caused. All local governments with a certified disaster council are required to develop their own emergency operations plan for their jurisdiction that meets state and federal requirements. Local emergency operation plans contain specific emergency planning considerations, such as evacuation and transportation, sheltering, hazard-specific planning, regional planning, public-private partnerships, and recovery planning (California Governor's OES 2017). The current version of the plan was adopted on October 1, 2017.

The Office of Emergency Services coordinates the responses of other agencies, including the US Environmental Protection Agency (EPA), California Highway Patrol, Regional Water Quality Control Boards, Air Quality Management Districts, and county disaster response offices.

California Code of Regulations: Standardized Emergency Management System

The Standardized Emergency Management System (SEMS) (CCR, Chapter 2, Division 2, Title 19) is intended to standardize responses to emergencies involving multiple jurisdictions or multiple agencies. SEMS requires that emergency response agencies use basic principles and components of emergency management, multiagency or interagency coordination, the operational area concept, and established mutual aid systems. Local government must use SEMS to be eligible for state funding of response-related personnel costs.

Cannabis State Regulations

CCR, Title 4, Division 19 includes the following requirements regarding wildfire:

- **Section 15011(a):** A commercial cannabis business applying for a license to cultivate cannabis shall provide the following information:

  (10) An attestation that the local fire department has been notified of the cultivation site if the application is for an indoor license type.

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

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

- Section 15011: Additional Information

  (a) A commercial cannabis business applying for a license to cultivate cannabis shall provide the following information:

  (10) An attestation that the local fire department has been notified of the cultivation site if the application is for an indoor license type.

- Section 17202.1: General Requirements for Extraction and Post-Extraction Processing

  (a) A licensed manufacturer that uses a volatile solvent, a flammable liquid, or a solvent that creates an asphyxiant gas shall ensure that the solvent is used in accordance with the requirements of:

  (1) Chapter 39 of the California Fire Code;

  (2) Title 8, California Code of Regulations, sections 5416–5420, which includes ensuring adequate ventilation and controlling sources of ignition;

  (3) All Division of Occupational Safety and Health (Cal/OSHA) regulations related to the processing, handling, and storage of the applicable solvent; and

  (4) All fire, safety, and building code requirements related to the processing, handling, and storage of the applicable solvent or gas.

(b) No volatile solvent extraction or post-extraction processing operations or other closed-loop system operations shall occur in an area zoned as residential.

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

2.19.2.3 *Local*

San Diego County General Plan

The General Plan policies addressing wildfire that are applicable to the proposed Cannabis Program include the following:

- **Policy LU-6.10: Protection from Hazards.** Require that development be located and designed to protect property and residents from the risks of natural and man-induced hazards.
- **Policy LU-6.11: Protection from Wildfires and Unmitigable Hazards.** Assign land uses and densities in a manner that minimizes development in extreme, very high and high fire threat areas or other unmitigable hazardous areas.
- **Policy LU-10.2: Development—Environmental Resource Relationship.** Require development in Semi-Rural and Rural areas to respect and conserve the unique natural features and rural character, and avoid sensitive or intact environmental resources and hazard areas.
- **Policy S-4.1: Defensible Development.** Require development to be located, designed, and constructed to provide adequate defensibility and minimize the risk of structural loss and life safety resulting from wildland fires.
- **Policy S-4.2: Development in Hillsides and Canyons.** Require development located near ridgelines, top of slopes, saddles, or other areas where the terrain or topography affect its susceptibility to wildfires to be located and designed to account for topography and reduce the increased risk from fires.
- **Policy S-4.3: Minimize Flammable Vegetation.** Site and design development to minimize the likelihood of a wildfire spreading to structures by minimizing pockets or peninsulas, or islands of flammable vegetation within a development.
- **Policy S-4.4: Service Availability.** Plan for development where fire and emergency services are available or planned.
- **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, and lengths of fire apparatus access roads shall meet the requirements of the State Fire Code and the San Diego County Consolidated Fire Codes. All requirements and any deviations will be at the discretion of the Fire Code Official.

- **Policy S-4.6: Fire Protection Plans.** Ensure that development located within fire threat areas implement measures in a Fire Plan that reduce the risk of structural and human loss due to wildfire.
- **Policy S-4.7: Fire Resistant Construction.** Require all new, remodeled, or rebuilt structures to meet current ignition resistance construction codes and establish and enforce reasonable and prudent standards that support retrofitting of existing structures in high fire hazards areas.
- **Policy S-5.1: Fuel Management Programs.** Support programs and plans, such as Strategic Fire Plans, consistent with state law that require fuel management/modification within established defensible space boundaries and when strategic fuel modification is necessary outside of defensible space, balance fuel management needs to protect structures with the preservation of native vegetation and sensitive habitats.
- **Policy S-7.1 Water Supply**. Ensure that water supply infrastructure adequately supports existing and future development and provides adequate water flow to combat structural and wildland fires. Water systems shall equal or exceed the California Fire Code, California Code of Regulations, or, where a municipal-type water supply is unavailable, the latest edition of National Fire Protection Association (NFPA) 1142, "Standard on Water Supplies for Suburban and Rural Fire Fighting."
- **Policy M-1.2: Interconnected Road Network.** Provide an interconnected public road network with multiple connections that improve efficiency by incorporating shorter routes between trip origin and destination, disperse traffic, reduce traffic congestion in specific areas, and provide both primary and secondary access/egress routes that support emergency services during fire and other emergencies.
- **Policy M-3.3: Multiple Ingress and Egress.** Require development to provide multiple ingress/egress routes in conformance with state law and local regulations.

In addition, the General Plan Safety Element identifies major freeways and state routes (SRs) as potential evacuation routes within the county, including Interstate (I)-5, I-15, I-8, I-805, SR-52, SR-54, SR-56, SR-67, SR-75, SR-76, SR-78, SR-84, SR-125, SR-163, and SR-905.

Operational Area Emergency Operations Plan

The Operational Area Emergency Operations Plan (OA EOP), also known as the San Diego County Emergency Operations Plan, is a comprehensive emergency plan for the county. The OA EOP was updated and approved by the County Board of Supervisors in August 2022 (Unified San Diego County Emergency Services Organization and County of San Diego 2022). The OA EOP contains 16 annexes (as listed in Section 2.10.1.6, "Emergency Response and Evacuation Plans"). The OA EOP is used by the County of San Diego and all the cities within the county to respond to major emergencies and disasters. Specifically, the OA EOP describes a comprehensive emergency management system that provides for a planned response to disaster situations associated with technological incidents, terrorism, nuclear-related incidents, and natural disasters, such as wildland fires. The OA EOP has the following 5 objectives:

1. To provide a system for the effective management of emergency situations.
2. To identify lines of authority and relationships.

3. To assign tasks and responsibilities.
4. To ensure adequate maintenance of facilities, services and resources.
5. To provide a framework for adequate resources for recovery operations.

The stand-alone emergency plans for the OA in the county include the following:

- San Diego County Nuclear Power Plant Emergency Response Plan
- San Diego County OA Oil Spill Contingency Element of the Area Hazardous Materials Plan
- San Diego County OA Emergency Water Contingencies Plan
- Unified San Diego County Emergency Services Organization OA Energy Shortage Response Plan
- Unified San Diego County Emergency Services Organization Recovery Plan
- San Diego County Multi-Jurisdictional Hazard Mitigation Plan
- San Diego Urban Area Tactical Interoperable Communications Plan
- San Diego County Draft Terrorist Incident Emergency Response Protocol

The OA EOP and San Diego County Multi-Jurisdictional Hazard Mitigation Plan are the primary emergency response and evacuation plans for the county. Ground transportation is the primary means of evacuation in the county. Primary evacuation routes include major ground transportation corridors.

Regulatory requirements applicable to fire protection are as follows:

- County of San Diego General Plan Safety Element policies related to wildlife hazards and Exhibit S-3: Potential Evacuation Routes
- County of San Diego Code of Regulatory Ordinances (Regulatory Code) Sections 68.401–68.406, Combustible Vegetation and Other Flammable Materials Ordinance
- County of San Diego Code of Regulatory Ordinances Sections 96.1.005 and 96.1.202, Removal of Fire Hazards
- County of San Diego Consolidated Fire Code
- County Department of Planning and Land Use Fire Prevention in Project Design Standards

The regulatory framework discussed in the 2011 General Plan Update EIR continues to apply to the unincorporated county and is incorporated into this section by reference. Regulations that have been updated or introduced since adoption of the General Plan in August 2011 are described in the following sections.

San Diego County Multi-Jurisdictional Hazard Mitigation Plan

The Multi-Jurisdictional Hazard Plan is a countywide plan that identifies risk and ways to minimize damage by natural and human-caused disasters. The plan has been incorporated into the General Plan Safety Element. Safety Element Policy S-1.4 identifies the County's intent to review and update this plan every 5 years. This plan was last revised in February

2023 to reflect changes to both the hazards threatening San Diego County, as well as the programs in place to minimize or eliminate those hazards. The 2023 plan combined wildfire and structure fire as one hazard category and determined that it is highly likely for future wildfire events to occur in 75–100 percent of the planning area.

County of San Diego Code of Regulatory Ordinances, Sections 68.401–68.406, Defensible Space for Fire Protection Ordinance

This ordinance addresses the accumulation of weeds, rubbish, and other materials on private property found to create a fire hazard and be injurious to the health, safety, and general welfare of the public. The ordinance constitutes the presence of such weeds, rubbish, and other materials as a public nuisance, which must be abated in accordance with the provisions of these sections. This ordinance is enforced in all CSAs and in the unincorporated county outside of a fire protection district. All fire protection districts have a combustible vegetation abatement program, and many fire protection districts have adopted and enforce the County's ordinance. This ordinance was last updated in 2011.

County of San Diego Code of Regulatory Ordinances, Sections 96.1.004 and 96.1.4907, Removal of Fire Hazards

The San Diego County Fire Authority and Fire Districts, in partnership with CAL FIRE, the Bureau of Land Management, and USFS, is responsible for the enforcement of defensible space inspections. Inspectors from CAL FIRE are responsible for the inspection of properties to ensure an adequate defensible space has been created around structures. If violations of the program requirements are noted, inspectors provide a list of required corrective measures and provide a reasonable timeframe to complete the task. If the violations still exist upon reinspection, the local fire inspector will forward a complaint to the County for further enforcement action. This is part of the County Consolidated Fire Code, which was last updated in 2023 (described in greater detail below).

2023 Consolidated Fire Code

Effective April 13, 2023, the Consolidated Fire Code includes the County amendments to the 2022 California Fire Code and the ordinances of the 12 unincorporated county fire protection districts (County of San Diego 2023b). Because of the county's changing climatic, geological, and topographical conditions, the County Fire Code is amended every 3 years when the State of California repeals, revises, and republishes the California Building Code. It is adopted for the protection of public health and safety and applies to both ministerial and discretionary projects. It includes definitions; requirements for permits and inspection for installing or altering systems; regulations for the erection, construction, enlargement, alteration, repair, moving, removal, conversion, demolition, equipment use, and maintenance of buildings, structures, and premises (including the installation, alteration, or repair of new and existing fire protection systems and their inspection); and provides penalties for violation of this code. The County Fire Code applies to all new construction and to any alterations, repairs, or reconstruction, except as otherwise provided for in Title 9, Division 6, Chapter 1 of the County Code.

San Diego County Fire Authority Water Tank Standards for Fire Protection

The San Diego County Fire Authority Water Tank Standards for Fire Protection provides standards for the minimum water storage needed to provide protection for dwellings and other

structures where adequate public and private water supply is not available. The standards specify minimum water flow and capacity requirements based on building square footage, as well as requirements for water tank location (San Diego County Fire Authority 2018).

Fire Safe Council of San Diego County

The Fire Safe Council (FSC) of San Diego County was formed in 1997 as a nonprofit corporation through a collaboration between the Resource Conservation District of Greater San Diego County and federal, state, local, and tribal fire agency partners. The FSC acts as an umbrella organization for the 38 locally formed community fire safe councils within the county. These local councils are typically formed by citizens through the greater FSC of San Diego County and are considered part of the statewide network of fire safe councils. Approximately 150 communities throughout the state have created fire safe councils, 35 of which are within San Diego County.

2.19.3 Analysis of Project Impacts and Determination of Significance

2.19.3.1 *Thresholds of Significance*

According to guidance provided in Appendix G of the State CEQA Guidelines and the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Wildland Fire and Fire Protection*, if located in or near SRAs or lands classified as Very High FHSZ, the proposed Cannabis Program would result in a significant impact if it would:

- increase risk of wildland fire ignition and directly or indirectly expose people or structures to significant risk of loss, injury, or death involving wildland fires;
- substantially impair an adopted emergency response plan or emergency evacuation plan;
- due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire;
- require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or
- expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

2.19.3.2 *Issues Not Evaluated Further*

Impacts related to the potential for the Cannabis Program to substantially impair an adopted emergency response plan, emergency evacuation plan, or otherwise impair emergency access and evacuation are addressed in Section 2.10, “Hazards and Hazardous Materials,” and Section 2.16, “Transportation.” Therefore, this issue is not evaluated further in this section.

2.19.3.3 *Approach to Analysis*

The evaluation of potential wildfire impacts is based, in part, on a review of the applicable documents from USFS, CAL FIRE, and the County of San Diego. Because the specific locations and details of future commercial cannabis projects are unknown, this section analyzes the potential wildfire impacts from implementing the proposed Cannabis Program at a programmatic level. Thus, future site-specific impact analyses would be required to determine whether a future commercial cannabis project would result in project-specific impacts in addition to what is concluded in this analysis. If additional impacts could occur, subsequent CEQA documentation would be required to analyze potential impacts and identify mitigation, as necessary, to reduce impacts to the extent feasible. The analysis considers the effectiveness of existing regulations to address potential wildfire hazards associated with future commercial cannabis projects under the proposed Cannabis Program.

2.19.3.4 *Issue 1: Increase Risk of Wildland Fire Ignition*

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: Wildland Fire and Fire Protection*, the proposed Cannabis Program would have a significant impact if it would:

- increase risk of wildland fire ignition that would expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

Impact Analysis

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 distribution facilities, cannabis microbusinesses; cannabis testing laboratories; and cannabis temporary events. Commercial cannabis uses would be prohibited in the coastal zone and would only be permitted in agricultural, commercial, and industrial zones, subject to applicable zoning ordinance regulations.

As discussed in Section 2.19.1, “Existing Conditions,” the unincorporated county has a long history of wildland fires. In addition, as shown in Table 2.19.2 and Figure 2.19.1, which are presented at the end of this section, a majority of the unincorporated area of the county is classified as being within High and Very High FHSZs (approximately 1,008,400 acres) and includes many of the county’s unincorporated communities (e.g., Warner Springs). These areas are mapped based on fuels, terrain, weather, and other factors. Moreover, 575,434 acres of the unincorporated county are within the WUI (County of San Diego 2011). Within the program area, approximately 433,034 acres are located within the Very High FHSZ and 47,128 acres are within the High FHSZ. Although wildfire behavior is primarily related to conditions such as fuels, terrain, and weather, human influences are also major contributors to wildfire risk.

Anthropogenic influence more directly controls fire frequency (i.e., number of ignitions) than size of a burn because humans are responsible for most wildfire ignitions. Once started, fire

spread and behavior become a function of fuel characteristics, terrain, and weather conditions (Syphard et al. 2008). In 2022, more than half of all fires in California were caused by humans, and when miscellaneous and undetermined causes are included, that figure increases to 97 percent (CAL FIRE 2022). Human ignitions include a multitude of sources, including escapes from debris and brush-clearing fires, electrical equipment malfunctions, campfire escapes, smoking, fire play (e.g., fireworks), vehicles, and arson. Consequently, areas near human development, especially in the WUI or in areas near campgrounds and roads, generate fires at a more frequent rate than very remote or urban areas (Syphard et al. 2007; Mann et al. 2016; Balch et al. 2017). Common causes of wildfire in San Diego County include equipment use, vehicle fires spreading into wildlands, accidental starts from warming or debris fires, and arson. As presented in Table 2.19.4 presented at the end of this section, the predominant cause of wildfire changes from year to year in the SRA within San Diego County. When considered over the period of 2019 through 2023 and excluding miscellaneous and undetermined causes, the majority of the fires within San Diego County (approximately 59 percent) were caused by vehicles, followed by equipment use and arson.

Because areas where commercial cannabis uses would be allowed are located within the SRA, including areas designated as High and Very High FHSZs, the Cannabis Program could increase the risk of loss, injury, or death involving wildland fires through introduction and concentration of ignition sources. Table 2.19.5, presented at the end of this section, provides the acreages of High and Very High FHSZ designations within each zoning district where commercial cannabis uses would be allowed under the proposed Cannabis Program. The FHSZ maps evaluate “hazard,” not “risk,” and are based on the physical conditions that create a likelihood and expected fire behavior over a 30- to 50-year period without considering mitigation measures, such as home hardening, recent wildfire, or fuel reduction efforts. “Risk” is the potential damage a fire can cause to the area under existing conditions, accounting for any modifications, such as fuel-reduction projects, defensible space, and ignition-resistant building construction. The FHSZ mapping addresses existing conditions, such as fuel, slope, weather, fire history, and access to a fire department.

As shown in Table 2.19.5, a vast majority of the program area is within the High and Very High FHSZs, with agricultural zones (A70, A72) making up approximately 99 percent of the total program area within the Very High and High FHSZs. However, approximately 3,041 acres of commercial (C35, C36, C37, C38, C40) and industrial zones (M50, 52, 54, 56, 58) would also be within the Very High and High FHSZs. Although commercial and industrial zones make up only 1 percent of the total program area within the Very High and High FHSZs, these zones would allow for various types of commercial cannabis uses that would have the potential to exacerbate wildfire hazards. Within commercial zones in the program area, allowable commercial cannabis uses would include indoor cultivation, nonvolatile manufacturing, distribution, retail storefront, retail non-storefront (delivery), on-site consumption lounges, microbusinesses, and temporary cannabis events. Industrial zones in the program area would generally allow for the same commercial cannabis uses, as well as volatile manufacturing and testing.

The potential for wildfires to occur is associated with fuel availability (e.g., the presence of flammable vegetation and other materials needed to feed a fire). Fire on agricultural land accounts for approximately 8 to 11 percent of global fires. Agricultural fires burn through various crops, pastures, and native vegetation on farms. Among different crop types, fruit crops and cereals have been found to be more flammable than vegetable crops, grazing

herbs, pasture grasses, pasture legumes, and weeds. Generally, crop flammability has been correlated to lower moisture content, higher retention of dead material, and faster moisture loss rating (Pagadal et al. 2024). With this understanding in mind, cannabis may not be considered a crop with higher flammability potential, compared to orchard or cereal crops because it is harvested before the plant may dry out and is not maintained with any dead material because new plants are established annually and completely removed after harvest.

Although the County maintains defensible space and vegetation management requirements, such as County of San Diego Code of Regulatory Ordinances Sections 68.401–68.406 (Defensible Space for Fire Protection Ordinance), the requirements do not apply to any portion of a parcel that has been in active production of agricultural crops within one growing season of that crop. In addition, per the 2023 Consolidated Fire Code, agricultural buildings constructed of wood or metal frames over which fabric or similar material is stretched, which are specifically used as green houses are exempt from the automatic sprinkler system requirements unless physically connected to other building. While cannabis cultivation sites typically involve wood fencing, which may be a fuel for wildland fire, their operation may also increase vegetation management on a previously undisturbed area. Generally, outdoor cannabis cultivation activities under the proposed Cannabis Program would be substantially similar to other agricultural uses within the county. For example, row crops involve similar activities to cannabis, including land preparation, planting, cultivation (e.g., application of fertilizers and water), use of storage and processing buildings, and harvesting. Therefore, outdoor cannabis cultivation would not substantially increase fuels compared to traditional agriculture in the county.

While cannabis may not present uniquely flammable properties as a crop type, a recent study indicates that cannabis cultivation tends to be located more often in High and Very High FHSZs and closer to wildfire perimeters than any other agricultural crop type. Furthermore, cannabis cultivation occurred more often in projected wildfire hotspots than other agricultural crop types. While this indicates the potential for cannabis to be susceptible to wildland fire, it does not indicate the potential for increased fire risk from cultivation of cannabis as opposed to other crop types (Dillis et al. 2022).

As provided in Table 2.19.4, during the period of 2019 through 2023 and excluding miscellaneous and undetermined causes, the majority of the fires within San Diego County (approximately 59 percent) were caused by vehicles, followed by equipment use and arson. As such, the primary causes of wildfire in the county can be attributed to increased development and human access to wildfire-prone areas of the county. Allowable cannabis uses within agricultural zones that would involve increased development are associated with indoor and mixed-light cultivation and accessory uses. These types of developments would involve extension of electrical power and equipment use that are more generally associated with commercial and industrial uses, thus increasing the potential for ignition from electrical power and equipment uses. If wildland fires are ignited in areas designated as Very High and High FHSZs, there is substantial potential risk of loss, injury, or death because these areas have been identified as containing existing hazardous conditions related to wildfire.

In addition to the uses described above for cultivation uses, the Cannabis Program would allow for cannabis manufacturing operations in commercial and industrial zones that could employ volatile extraction methods to create cannabis products. Volatile extraction may involve the use of butane, carbon dioxide, chlorofluorocarbons, hydrocarbon, or other fluorinated gases that could present a fire hazard. Fire hazards associated with these facilities is address through

CCR Title 4, Division 19, Sections 17202.1 and 17205, which include requirements for cannabis manufacturing facilities that use a volatile solvent, flammable liquid, solvents that creates an asphyxiant gas, or ethanol.

While tobacco cigarette smoking is a well-known ignition source of wildfires, it is not particularly common as a cause of wildland fire within the county in recent years (see Table 2.19.4). In addition, only “fire-safe” cigarettes may be sold in the United States. These cigarettes self-extinguish if not smoked frequently enough. While fire may still be ignited by self-extinguishing cigarettes, it is believed that ignition rates have decreased. While data is limited, a recent study suggests that cannabis cigarettes are generally more difficult to initially ignite and may have less potential to burn than a tobacco cigarette. This, however, may be dependent on the concentration of resins and oils specific to the strain of cannabis (Jason et al. 2014). The use of incendiary devices to consume cannabis (e.g., joints, pipes, bongs), nonetheless, involves fire ignition, which can pose a risk of fire. However, cannabis consumption in consumption lounges and temporary cannabis events would be restricted to designated areas of the premises and structures that would avoid accidental ignition of vegetation.

All new commercial cannabis projects would be required to be designed in accordance with the applicable provisions of CBC and CFC. Chapter 7A of the CBC includes standards for building materials, systems, and assemblies used in the exterior design and construction of new buildings located within any FHSZ or WUI area to prevent the intrusion of flames and embers. In addition, the CFC establishes the minimum requirements consistent with nationally recognized good practices for providing life safety and property protection from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises and providing safety and assistance to firefighters and emergency responders during emergency situations. The CFC specifies fire-resistant ratings for building materials and finishes, installation of sprinklers, use and storage of hazardous or flammable materials, and means of egress.

In addition to the CBC and CFC, future commercial cannabis projects would be subject to PRC Sections 4290 and 4291. PRC Section 4290 gives CAL FIRE responsibility for enforcement of Fire Safe Standards, including road standards for fire equipment access; standards for signs identifying streets, roads, and buildings; minimum private water supply reserves for emergency fire use; fuel breaks; and greenbelts. PRC Section 4291 requires any person who owns, leases, controls, operates, or maintains a building or structure in, upon, or adjoining a mountainous area, forest-covered lands, brush-covered lands, grass-covered lands, or land that is covered with flammable material to maintain defensible space of 100 feet from each side and from the front and rear of the structure. Under PRC Section 4291, the amount of fuel modification necessary must take into account the flammability of the structure as affected by building material, building standards, location, and type of vegetation. Fuels are required to be maintained in a condition so that a wildfire burning under average weather conditions would be unlikely to ignite the structure. The provision of defensible space and the associated reduction of vegetative fuels have been found to be effective at reducing fire frequency, fire severity, and annual area burned over an extended period of time. Where treatments have occurred, the pattern of wildfire progression may be limited to low-intensity underbrush and surface burning, which can create safe conditions for firefighters to successfully suppress fires in areas near structures, or around areas of high resource value (Kim et al. 2013; Martinson and Omi 2013; Tubbesing et al. 2019).

Furthermore, CCR Title 4, Division 19, Sections 17202.1 and 17205 provide several fire safety requirements for cannabis manufacturing facilities that use a volatile solvent, flammable liquid, solvents that create an asphyxiant gas, or ethanol to ensure compliance with Chapter 35 of the California Fire Code, CCR Title 8, Sections 5416–5420 that address ventilation and control of ignition sources; Division of Occupational Safety and Health regulations; and all applicable fire, safety, and building codes related to the processing, handling, and storage of solvents and gas. These standards require fire control measures that include proper handling of flammable materials to avoid fire hazards and engineering of the closed-loop extraction systems to accepted engineering practices that meet fire code and avoid accidental fire events.

Beyond the state requirements described above, future commercial cannabis projects would be required to comply with County and local fire protection agency requirements, including County of San Diego Code of Regulatory Ordinances Sections 68.401–68.406 (Defensible Space for Fire Protection Ordinance) and Sections 96.1.004 and 96.1.4907 (Removal of Fire Hazards), the 2023 Consolidated Fire Code, and applicable General Plan policies listed in Section 2.19.2, "Regulatory Framework." These policies include requiring development to be protected from hazards (Policy LU-6.10); minimizing development in high fire threat areas (Policy LU-6.11); providing adequate defensibility and minimizing the risk of structural loss and life safety resulting from wildland fires (Policy S-4.1); requiring the design of development to account for topography to reduce fire risk (Policy S-4.2); requiring development to be designed to minimize wildfire spreading (Policy S-4.3); requiring implementation of measures to reduce wildfire risk if development is proposed within fire threat areas (Policy S-4.6); and requiring all new, remodeled, or rebuilt structures to meet current ignition resistance construction codes (Policy S-4.7). Lastly, the proposed Cannabis Program would include Section 21.2508(a) of the amendments to the County Regulatory Code, and commercial cannabis facilities would be required to obtain all applicable zoning and land use entitlements, including approval from the local fire authority. As required by the San Diego County Fire Authority, building and grading plan forms, including fire code plan check requirements, would be necessary for all new buildings, as well as compliance with the 2023 Consolidated Fire Code for the fire protection districts in San Diego County consistent with applicable fire standards and General Plan policies.

Alternative 1: No Project—Retention of Current Cannabis Regulations

Under Alternative 1, the Cannabis Program would not be adopted. The existing 5 commercial cannabis facilities in the unincorporated areas of El Cajon, Escondido, and Ramona would be allowed to continue to operate under the existing ordinances, which allow for expansion of their existing facilities and operations to a total of 10,000 square feet of building area. However, no new commercial cannabis operations would be allowed. Existing commercial cannabis facilities proposing physical expansion or improvements to their facilities would be required to comply with existing regulations addressing fire risk, including defensible space requirements of the Regulatory Code. Because these improvements would occur at existing commercial cannabis facilities located in urban and rural developed areas, they would not represent a new commercial cannabis use that would increase the risk of wildland fire ignition that would expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

This impact would be less than significant under Alternative 1.

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

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

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

- PRC Sections 4290 and 4291, which require defensible space of 100 feet around all buildings and structures, adequate emergency access and egress, availability of emergency water, and building signage and number requirements.
- PRC Section 4427, which includes fire safety statutes that restrict the use of construction equipment that may produce a spark, flame, or fire; require the use of spark arrestors on construction equipment with internal combustion engines; specify requirements for the safe use of gasoline-powered tools in fire hazard areas; and specify fire suppression equipment that must be provided on site for various types of work in fire-prone areas.
- CCR, Title 24, Section 701A.3, which contains additional building standards for new building construction located in any Fire Hazard Severity Zone within SRAs, any local agency Very High Fire Hazard Severity Zone, or any Wildland-Urban Interface Fire Area.
- CCR Title 4, Division 19, Section 15011, regarding the notification of the cannabis use to the local fire department.
- CCR Title 4, Division 19, Sections 17202.1 and 17205, which include requirements for cannabis manufacturing facilities that use a volatile solvent, flammable liquid, solvents that creates an asphyxiant gas, or ethanol.
- County Regulatory Code Sections 68.401–68.406 (Defensible Space for Fire Protection Ordinance) and Sections 96.1.004 and 96.1.4907 (Removal of Fire Hazards).
- Amendments to County Regulatory Code, including Section 21.2508(a) as part of proposed in the Cannabis Program, which requires commercial cannabis facilities to obtain all applicable zoning and land use entitlements, including approval from the local fire authority. As required by the San Diego County Fire Authority, building and grading plan forms including fire code plan check requirements would be necessary for all new buildings, as well as compliance with the 2023 Consolidated Fire Code for the fire protection districts in San Diego County.

Compliance with existing regulations would ensure that future commercial cannabis facilities under Alternative 2 would not increase the risk of wildland fire ignition that would expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

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). Under Alternative 3, the definition of "sensitive uses" would be expanded beyond schools, daycares, and youth centers to also include regional parks, local parks, public trails, recreation facilities, preserves with visitor-serving amenities, religious assembly, childcare centers, public libraries operated by the County or other cities, residential care facilities, and other cannabis facilities. Alternative 3 additionally prohibits the development of cannabis facilities within 1,000 feet of the expanded definition of sensitive uses, including other cannabis facilities. Advertising of cannabis on billboards would also be prohibited within 1,000 feet of the expanded sensitive uses.

Similar to Alternative 2, compliance with existing regulations would ensure that future commercial cannabis facilities under Alternative 3 would not increase the risk of wildland fire ignition that would expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

This impact would be less than significant under Alternative 3.

Alternative 4: Cannabis Program with Outdoor Cannabis Cultivation Prohibition

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

Similar to Alternative 2, compliance with existing regulations would ensure that future commercial cannabis facilities under Alternative 4 would not increase the risk of wildland fire ignition that would expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

This impact would be less than significant under Alternative 4.

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

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

Similar to Alternative 2, compliance with existing regulations would ensure that future commercial cannabis facilities under Alternative 4 would not increase the risk of wildland fire ignition that would expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

This impact would be less than significant under Alternative 5.

2.19.3.5 *Issue 2: Exacerbate Wildfire Risks Due to Slope, Prevailing Winds, and Other Factors*

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: Wildland Fire and Fire Protection*, the proposed Cannabis Program would have a significant impact if it would be located in or near an SRA or Very High FHSZ and:

- exacerbate wildfire risks due to slope, prevailing winds, and other factors and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

Impact Analysis

As discussed in Section 2.19.1, "Existing Conditions," the unincorporated county has a long history of wildland fires. In addition, as discussed in Section 2.19.3.4, "Issue 1: Increase Risk of Wildland Fire Ignition," a majority of the unincorporated area of the county is classified as being within High and Very High FHSZs—approximately 1,008,400 acres—while approximately 575,434 acres of the unincorporated county are within the WUI (County of San Diego 2011). A vast majority of the program area is within the High and Very High FHSZs, with agricultural zones (A70, A72) making up approximately 99 percent of the total program area within the Very High and High FHSZs. However, approximately 3,041 acres of commercial (C35, C36, C37, C38, C40) and industrial zones (M50, 52, 54, 56, 58) would also be within the Very High and High FHSZs.

San Diego County's topography consists of a semiarid coastal plain and rolling highlands which, when fueled by shrub overgrowth, occasional Santa Ana winds, and high temperatures, creates an ever-present threat of wildland fire. Extreme weather conditions, such as high temperature, low humidity, or winds of extraordinary force, may cause an ordinary fire to expand into one of massive proportions.

As discussed in Section 2.19.3.4, the construction and operation of future commercial cannabis projects under the Cannabis Program in wildfire-prone areas of the unincorporated county (i.e., High and Very High FHSZ or WUI) could potentially exacerbate existing wildfire hazards. These wildfire hazards would be increased if new commercial cannabis facilities are located in areas with steep topography or prevailing winds because those conditions contribute to the spread of wildfires and make wildfires more difficult to contain. Construction of future commercial cannabis facilities would include the use of equipment and materials that could be a source of wildfire ignition and increase the risk of wildfire. However, construction associated with future commercial cannabis projects would be required to occur in compliance with the CBC and CFC, which establish requirements that would be applicable during construction and demolition, including proper storage procedures for combustible materials and the proper refueling protocol. In addition, future construction activities would be subject to PRC Section 4427, which includes fire safety statutes that restrict the use of equipment that may produce a spark, flame, or fire; require the use of spark arrestors on construction equipment with internal combustion engines; specify requirements for the safe use of gasoline-powered tools in fire

hazard areas; and specify fire suppression equipment that must be provided on-site for various types of work in fire-prone areas.

Similarly, as discussed in Section 2.19.3.4, the operation of future commercial cannabis projects could exacerbate wildfire risk from the placement of new structures and people in wildfire-prone areas, new electrical sources and infrastructure, storage of flammable materials (e.g., chemicals for cannabis processing and manufacturing), and related commercial cannabis cultivation activities. Cannabis manufacturing operations in commercial and industrial zones could employ volatile extraction methods to create cannabis products. Volatile extraction may involve the use of butane, carbon dioxide, chlorofluorocarbons, hydrocarbon, or other fluorinated gases that could present a fire hazard. Fire hazards associated with these facilities is addressed through CCR Title 4, Division 19, Sections 17202.1 and 17205, which include requirements for cannabis manufacturing facilities that use a volatile solvent, flammable liquid, solvents that creates an asphyxiant gas, or ethanol. In addition, the Cannabis Program would allow for on-site consumption lounges and temporary cannabis events in commercial and industrial zones. Although a recent study suggests that cannabis cigarettes are generally more difficult to initially ignite and may have less potential to burn than a tobacco cigarette, the use of incendiary devices to consume cannabis (e.g., joints, pipes, bongs), nonetheless, involves fire ignition, which can pose a risk of fire. However, cannabis consumption in consumption lounges and temporary cannabis events would be restricted to designated areas of the premises and structures that would avoid accidental ignition of vegetation.

The increased potential for wildfires from implementation of the Cannabis Program could also pose health risks to people working or residing in the unincorporated county. Exposure to particulate matter generated by wildfire events can result in significant health problems, including aggravated asthma, increased susceptibility to respiratory infections, and heart attacks and arrhythmias in people with heart disease (Sacramento Metropolitan Air Quality Management District 2019).

As discussed in Section 2.19.3.4 above, future commercial cannabis projects would be subject to local and state regulations related to building construction and the provision of proper defensible space distances to minimize the potential exacerbation of wildfire hazards. These regulations include the CBC; CFC; PRC Sections 4290, 4291, and 4427; CCR Title 4, Division 19, Sections 17202.1 and 17205; CCR Title 17, Division 1, Chapter 13; Regulatory Code Sections 68.401–68.406 (Defensible Space for Fire Protection Ordinance) and Sections 96.1.004 and 96.1.4907 (Removal of Fire Hazards); and the 2023 Consolidated Fire Code, as well as applicable General Plan policies. In addition, the Cannabis Program proposes amendments to Regulatory Code, including Section 21.2508(a), which requires commercial cannabis facilities to obtain all applicable zoning and land use entitlements, including approval from the local fire authority. As required by the San Diego County Fire Authority, building and grading plan forms, including fire code plan check requirements, would be necessary for all new buildings, as well as compliance with the 2023 Consolidated Fire Code for the fire protection districts in San Diego County.

Compliance with the state and local regulations and General Plan policies described above would ensure that future commercial cannabis projects would not exacerbate wildfire risks due to slope, prevailing winds, and other factors and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

Alternative 1: No Project—Retention of Current Cannabis Regulations

Under Alternative 1, the Cannabis Program would not be adopted. The existing 5 commercial cannabis facilities in the unincorporated areas of El Cajon, Escondido, and Ramona would be allowed to continue to operate under the existing ordinances, which allow for expansion of their existing facilities and operations to a total of 10,000 square feet of building area. However, no new commercial cannabis operations would be allowed. Existing commercial cannabis facilities proposing physical expansion or improvements to their facilities would be required to comply with existing regulations addressing fire risk, including defensible space requirements of the Regulatory Code. Because these improvements would occur at existing commercial cannabis facilities located in urban and rural developed areas, they would not represent a new commercial cannabis use that would exacerbate existing wildfire hazards due to slope, prevailing winds, or other factors.

This impact would be less than significant under Alternative 1.

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

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

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

- PRC Sections 4290 and 4291, which require defensible space of 100 feet around all buildings and structures, adequate emergency access and egress, availability of emergency water, and building signage and number requirements.
- PRC Section 4427, which includes fire safety statutes that restrict the use of construction equipment that may produce a spark, flame, or fire; require the use of spark arrestors on construction equipment with internal combustion engines; specify requirements for the safe use of gasoline-powered tools in fire hazard areas; and specify fire suppression equipment that must be provided on site for various types of work in fire-prone areas.
- CCR, Title 24, Section 701A.3, which contains additional building standards for new building construction located in any Fire Hazard Severity Zone within SRAs, any local agency Very High Fire Hazard Severity Zone, or any Wildland-Urban Interface Fire Area.
- CCR Title 4, Division 19, Section 15011, regarding the notification of the cannabis use to the local fire department.
- CCR Title 4, Division 19, Sections 17202.1 and 17205, which include requirements for cannabis manufacturing facilities that use a volatile solvent, flammable liquid, solvents that creates an asphyxiant gas, or ethanol.
- County Regulatory Code Sections 68.401–68.406 (Defensible Space for Fire Protection Ordinance) and Sections 96.1.004 and 96.1.4907 (Removal of Fire Hazards).

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

Compliance with existing regulations would ensure that future commercial cannabis facilities under Alternative 2 would not exacerbate existing wildfire hazards due to slope, prevailing winds, or other factors and therefore would not expose project occupants to pollutant concentrations.

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). Under Alternative 3, the definition of "sensitive uses" would be expanded beyond schools, daycares, and youth centers to also include regional parks, local parks, public trails, recreation facilities, preserves with visitor-serving amenities, religious assembly, childcare centers, public libraries operated by the County or other cities, residential care facilities, and other cannabis facilities. Alternative 3 additionally prohibits the development of cannabis facilities within 1,000 feet of the expanded definition of sensitive uses, including other cannabis facilities. Advertising of cannabis on billboards would also be prohibited within 1,000 feet of the expanded sensitive uses.

Similar to Alternative 2, compliance with existing regulations would ensure that future commercial cannabis facilities under Alternative 3 would not exacerbate existing wildfire hazards due to slope, prevailing winds, or other factors and therefore would not expose project occupants to pollutant concentrations.

This impact would be less than significant under Alternative 3.

Alternative 4: Cannabis Program with Outdoor Cannabis Cultivation Prohibition

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

Similar to Alternative 2, compliance with existing regulations would ensure that future commercial cannabis facilities under Alternative 4 would not exacerbate existing wildfire hazards due to slope, prevailing winds, or other factors and therefore would not expose project occupants to pollutant concentrations.

This impact would be less than significant under Alternative 4.

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

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

Similar to Alternative 2, compliance with existing regulations would ensure that future commercial cannabis facilities under Alternative 4 would not exacerbate existing wildfire hazards due to slope, prevailing winds, or other factors, and therefore would not expose project occupants to pollutant concentrations.

This impact would be less than significant under Alternative 5.

2.19.3.6 *Issue 3: Install Infrastructure That Exacerbates Wildfire Risk*

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: Wildland Fire and Fire Protection*, the Cannabis Program would have a significant impact if it would be located in or near an SRA or Very High FHSZ and:

- require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

Impact Analysis

As shown in Table 2.19.2 and Figure 2.19.1, which are presented at the end of this section, a majority of the unincorporated county is classified as being within High and Very High FHSZs–approximately 1,008,400 acres. In addition to FHSZ maps, it is helpful to also consider the CPUC Fire-Threat Map. These are areas where CPUC has defined existing extreme risk from wildfires associated with overhead utility power lines or overhead utility power-line facilities also supporting communication facilities. Tier 3 areas are at extreme risk for wildfire, Tier 2 areas are at elevated risk for wildfire, and Zone 1 High Hazard Zones are areas with high numbers of dead and dying trees. A vast majority of the county, including the program area, includes areas designated as Tier 3 and Tier 2 areas on the CPUC Fire-Threat Map.

The construction of new roads and extension of utilities into previously undeveloped areas could introduce new ignition sources that could increase wildfire hazards because most wildfires start near developed areas and roadways. The development of future commercial cannabis facilities under the Cannabis Program would include improvements, such as new buildings, water storage structures, maintenance of fuel breaks, and on-site roadway improvements. As discussed in Section 2.18, "Utilities and Service Systems," new commercial cannabis activities associated with the proposed Cannabis Program may construct or improve water, wastewater, stormwater drainage, electric power, natural gas (where available), and telecommunication facilities as needed based on site-specific conditions. Extension of these

infrastructure facilities is expected to be limited because they are generally available along roadway frontage of the parcels or may be accommodated on the site. As such, it is not anticipated that future commercial cannabis projects would require the extension of utility infrastructure into previously undeveloped areas.

As discussed under Section 2.19.3.4 above, future commercial cannabis projects would be subject to local and state regulations related to building construction and the provision of proper defensible space distances to minimize the potential exacerbation of wildfire hazards. These regulations include the CBC; CFC; PRC Sections 4290, 4291, and 4427; CCR, Title 17, Division 1, Chapter 13; Regulatory Code Sections 68.401–68.406 (Defensible Space for Fire Protection Ordinance) and Sections 96.1.004 and 96.1.4907 (Removal of Fire Hazards); and the 2023 Consolidated Fire Code, as well as applicable General Plan policies. In addition, the Cannabis Program proposes amendments to County Regulatory Code, including Section 21.2508(a), which requires commercial cannabis facilities to obtain all applicable zoning and land use entitlements, including approval from the local fire authority. As required by the San Diego County Fire Authority, building and grading plan forms, including fire code plan check requirements, would be necessary for all new buildings, as well as compliance with the 2023 Consolidated Fire Code for the fire protection districts in San Diego County.

Compliance with the state and local regulations and General Plan policies described above would ensure that future commercial cannabis projects would not exacerbate existing wildfire hazards or result in temporary or ongoing impacts to the environment from the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities).

Alternative 1: No Project—Retention of Current Cannabis Regulations

Under Alternative 1, the Cannabis Program would not be adopted. The existing 5 commercial cannabis facilities in the unincorporated areas of El Cajon, Escondido, and Ramona would be allowed to continue to operate under the existing ordinances, which allow expansion of their existing facilities and operations to a total of 10,000 square feet of building area. However, no new commercial cannabis operations would be allowed. Existing commercial cannabis facilities proposing physical expansion or improvements to their facilities would be required to comply with existing regulations addressing fire risk, including defensible space requirements of the Regulatory Code. Because these improvements would occur at existing commercial cannabis facilities currently served by existing infrastructure, they would not represent a new commercial cannabis use that would exacerbate existing wildfire hazards or result in temporary or ongoing impacts to the environment from the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities).

This impact would be less than significant under Alternative 1.

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

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

Under Alternative 2, new commercial cannabis facilities and associated infrastructure improvements would be subject to compliance with the fire regulations identified above, including fire protections requirements under PRC Section 4427, which would be implemented during construction of infrastructure improvements. Compliance with the state and local regulations described above would ensure that future commercial cannabis projects would not exacerbate existing wildfire hazards or result in temporary or ongoing impacts to the environment from the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities).

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). Under Alternative 3, the definition of "sensitive uses" would be expanded beyond schools, daycares, and youth centers to also include regional parks, local parks, public trails, recreation facilities, preserves with visitor-serving amenities, religious assembly, childcare centers, public libraries operated by the County or other cities, residential care facilities, and other cannabis facilities. Alternative 3 additionally prohibits the development of cannabis facilities within 1,000 feet of the expanded definition of sensitive uses, including other cannabis facilities. Advertising of cannabis on billboards would also be prohibited within 1,000 feet of the expanded sensitive uses.

Similar to Alternative 2, compliance with the state and local regulations described above would ensure that future commercial cannabis projects would not exacerbate existing wildfire hazards or result in temporary or ongoing impacts to the environment from the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities).

This impact would be less than significant under Alternative 3.

Alternative 4: Cannabis Program with Outdoor Cannabis Cultivation Prohibition

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

Similar to Alternative 2, compliance with the state and local regulations described above would ensure that future commercial cannabis projects would not exacerbate existing wildfire hazards or result in temporary or ongoing impacts to the environment from the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities).

This impact would be less than significant under Alternative 4.

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

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

Similar to Alternative 2, compliance with the state and local regulations described above would ensure that future commercial cannabis projects would not exacerbate existing wildfire hazards or result in temporary or ongoing impacts to the environment from the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities).

This impact would be less than significant under Alternative 5.

2.19.3.7 *Issue 4: Expose People or Structures to Post-Fire Risks*

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: Wildland Fire and Fire Protection*, the Cannabis Program, if located in or near an SRA or lands classified as Very High FHSZ, would have a significant impact if it would:

- expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

Impact Analysis

As discussed in Section 2.8, "Geology, Soils, and Mineral Resources," and Section 2.11, "Hydrology and Water Quality," SWRCB Order WQ 2023-0102-DWQ contains requirements for soil stability and erosion control for commercial cannabis cultivation sites. These requirements include preparation of plans that address site erosion and sediment control, stabilization of disturbed areas, site closure procedures, and monitoring and reporting requirements. In addition, SWRCB Order WQ 2023-0102-DWQ contains requirements for land development maintenance, erosion control, drainage features, stream crossing installation and maintenance, soil disposal and spoils management, and roadway design and maintenance.

Future commercial cannabis projects located on post-fire land areas could further destabilize soil and slope conditions from site development. However, as discussed under Section 2.19.3.4, compliance with state and local regulations and General Plan policies would ensure that future commercial cannabis projects would not exacerbate existing wildfire hazards. In addition, future commercial cannabis projects would be required to comply with SWRCB Order WQ 2023-0102-DWQ; the County's Grading, Clearing, and Watercourses Ordinance; and the California Building Code, which includes implementation of soil stability and erosion control features and requirements. SWRCB Order WQ 2023-0102-DWQ contains provisions for commercial cannabis cultivation that require the use of soil erosion and sedimentation control

best management practices for soil stability, as well as implementation of a site erosion and sediment control plan and disturbed area stabilization plan for higher risk sites. Moreover, the Cannabis Program proposes amendments to the Zoning Ordinance that would include development standards for cannabis activities that prohibit development on steep slopes, which would further reduce potential exacerbation of post-fire hazards in these areas.

Compliance with the state and local regulations and General Plan policies described above would ensure that future commercial cannabis projects would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

Alternative 1: No Project—Retention of Current Cannabis Regulations

Under Alternative 1, the Cannabis Program would not be adopted. The existing 5 commercial cannabis facilities in the unincorporated areas of El Cajon, Escondido, and Ramona would be allowed to continue to operate under the existing ordinances, which allow for expansion of their existing facilities and operations to a total of 10,000 square feet of building area. However, no new commercial cannabis operations would be allowed. Existing commercial cannabis facilities proposing physical expansion or improvements to their facilities would be required to comply with existing regulations addressing fire risk, including defensible space requirements of the Regulatory Code. Because these improvements would occur at existing commercial cannabis facilities located in urban and rural developed areas, they would not represent a new commercial cannabis use that would expose people or structures to significant risks from post-fire slope instability or drainage changes.

This impact would be less than significant under Alternative 1.

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

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

As identified above and in Section 2.8, “Geology, Soils, and Mineral Resources,” and Section 2.11, “Hydrology and Water Quality,” new commercial cannabis facilities under Alternative 2 would be subject to soil stability and erosion control requirements of SWRCB Order WQ 2023-0102-DWQ and the County’s Grading, Clearing, and Watercourses Ordinance, which would also apply to post-fire conditions. Compliance with the state and local regulations and General Plan policies described above would ensure that future commercial cannabis projects would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

This impact would be less than significant under Alternative 2.

Alternative 3: Cannabis Program with Expanded County Regulations

The Cannabis Program under Alternative 3 is anticipated to accommodate up to 372 cultivation and 170 noncultivation sites/licenses within the county in 2044 (refer to Table 1.4 in Chapter 1, “Project Description, Location, and Environmental Setting,” for a full list of development assumptions). Alternative 3 additionally prohibits the development of cannabis facilities within

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

Similar to Alternative 2, new commercial cannabis facilities under Alternative 3 would be subject to soil stability and erosion control requirements of SWRCB Order WQ 2023-0102-DWQ and the County's Grading, Clearing, and Watercourses Ordinance, which would also apply to post-fire conditions. Compliance with the state and local regulations and General Plan policies described above would ensure that future commercial cannabis projects would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

This impact would be less than significant under Alternative 3.

Alternative 4: Cannabis Program with Outdoor Cannabis Cultivation Prohibition

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

Similar to Alternative 2, new commercial cannabis facilities under Alternative 4 would be subject to soil stability and erosion control requirements of SWRCB Order WQ 2023-0102-DWQ and the County's Grading, Clearing, and Watercourses Ordinance, which would also apply to post-fire conditions. Compliance with the state and local regulations and General Plan policies described above would ensure that future commercial cannabis projects would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

This impact would be less than significant under Alternative 4.

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

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

Similar to Alternative 2, new commercial cannabis facilities under Alternative 5 would be subject to soil stability and erosion control requirements of SWRCB Order WQ 2023-0102-DWQ and the County's Grading, Clearing, and Watercourses Ordinance, which would also apply to post-fire conditions. Compliance with the state and local regulations and General Plan policies described above would ensure that future commercial cannabis projects would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

This impact would be less than significant under Alternative 5.

2.19.4 Cumulative Impacts

The geographic scope of the cumulative impact analysis for wildfire is the San Diego County. The cumulative impact analysis below considers whether implementation of the Cannabis Program, when combined with cumulative projects described in Section 1.13.2, "Cumulative Projects," would result in a cumulatively considerable contribution to cumulative wildfire impacts.

2.19.4.1 *Issue 1: Increase Risk of Wildland Fire Ignition*

The San Diego County General Plan Update EIR identified cumulatively considerable impacts associated with wildland fires from implementation of the General Plan Update (County of San Diego 2011).

As previously discussed, the majority of the unincorporated area of the county is in WUI areas and High and Very High FHSZs. Past and present development within high fire risk areas has increased wildfire risk in the unincorporated county, and reasonably foreseeable development in these areas would likely continue this trend. Given the substantial amount of area designated as High and Very High FHSZs in the unincorporated county, cumulative impacts related to exacerbating wildfire risk from the cumulative projects described in Section 1.13.2, "Cumulative Projects," are significant.

Alternative 1 would allow for the 5 existing commercial cannabis facilities in the unincorporated county to expand their existing facilities and operations to a total of 10,000 square feet of building area. However, no new commercial cannabis operations would be allowed. Because these improvements would occur at existing commercial cannabis facilities located in urban and rural developed areas, they would not represent a new commercial cannabis use that would increase the risk of wildland fire ignition. Therefore, implementation of the Cannabis Program under Alternative 1 would not result in a cumulative impact related to increasing the risk of wildland fire ignition. This impact would not be cumulatively considerable for Alternative 1.

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 designated as High and Very High FHSZs or WUI areas. The development of future commercial cannabis projects in these areas could have the potential to increase the risk of wildland fire ignition. As discussed in Section 2.19.3.4, "Issue 1: Increase Risk of Wildland Fire Ignition," proposed commercial cannabis facilities would be subject to compliance with the following fire regulations:

- PRC Sections 4290 and 4291, which require defensible space of 100 feet around all buildings and structures, adequate emergency access and egress, availability of emergency water, and building signage and number requirements.
- PRC Section 4427, which includes fire safety statutes that restrict the use of construction equipment that may produce a spark, flame, or fire; require the use of spark arrestors on construction equipment with internal combustion engines; specify requirements for the safe use of gasoline-powered tools in fire hazard areas; and specify fire suppression equipment that must be provided on site for various types of work in fire-prone areas.

- CCR, Title 24, Section 701A.3, which contains additional building standards for new building construction located in any Fire Hazard Severity Zone within SRAs, any local agency Very High Fire Hazard Severity Zone, or any Wildland-Urban Interface Fire Area.
- CCR Title 4, Division 19, Section 15011, regarding the notification of the cannabis use to the local fire department.
- CCR Title 4, Division 19, Section 17202.1 and 17205, which include requirements for cannabis manufacturing facilities that use a volatile solvent, flammable liquid, solvents that creates an asphyxiant gas, or ethanol.
- County Regulatory Code Sections 68.401–68.406 (Defensible Space for Fire Protection Ordinance) and Sections 96.1.004 and 96.1.4907 (Removal of Fire Hazards).
- Amendments to County Regulatory Code, including Section 21.2508(a) as part of proposed in the Cannabis Program, which requires commercial cannabis facilities to obtain all applicable zoning and land use entitlements, including approval from the local fire authority. As required by the San Diego County Fire Authority, building and grading plan forms, including fire code plan check requirements, would be necessary for all new buildings, as well as compliance with the 2023 Consolidated Fire Code for the fire protection districts in San Diego County.

Compliance with existing regulations and processes would ensure that cumulative contributions to wildfire hazards from implementation of the Cannabis Program under Alternatives 2 through 5 would be minimized and would not increase the risk of wildland fire ignition. Therefore, the contribution of the Cannabis Program to significant cumulative impacts related to increasing the risk of wildland fire ignition that would expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires would be less than cumulatively considerable for Alternatives 2 through 5.

2.19.4.2 *Issue 2: Exacerbate Wildfire Risks Due to Slope, Prevailing Winds, and Other Factors*

The San Diego County General Plan Update EIR identified cumulatively considerable impacts associated with wildland fires from implementation of the General Plan Update (County of San Diego 2011).

Similar to Issue 1, the majority of the unincorporated county is in WUI areas and High and Very High FHSZs. Past and present development within high fire risk areas has increased wildfire risk in the unincorporated county, and reasonably foreseeable development in these areas would likely continue this trend. Given the substantial amount of area designated as High and Very High FHSZs in the unincorporated county, cumulative impacts related to exacerbating wildfire risk from the cumulative projects described in Section 1.13.2, “Cumulative Projects,” are significant.

Alternative 1 would allow the 5 existing commercial cannabis facility in the unincorporated county to expand their existing facilities and operations to a total of 10,000 square feet of building area. However, no new commercial cannabis operations would be allowed. Because these improvements would occur at existing commercial cannabis facilities currently served by existing infrastructure, they would not represent a new commercial cannabis use that would exacerbate existing wildfire hazards due to slope, prevailing winds, or other factors. Therefore,

implementation of the Cannabis Program under Alternative 1 would not result in a cumulative impact related to exacerbating wildfire hazards. This impact would not be cumulatively considerable for Alternative 1.

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 designated as High and Very High FHSZs or WUI areas. The development of future commercial cannabis projects in these areas could have the potential to exacerbate wildfire hazards. As discussed in Section 2.19.3.5, "Issue 2: Exacerbate Wildfire Risks Due to Slope, Prevailing Winds, and Other Factors," proposed commercial cannabis facilities would be subject to compliance with local and state regulations related to building construction and the provision of proper defensible space distances to minimize the potential exacerbation of wildfire hazards. These regulations include the CBC; CFC; PRC Sections 4290, 4291, and 4427; CCR Title 4, Division 19, Sections 17202.1 and 17205; CCR Title 17, Division 1, Chapter 13; Regulatory Code Sections 68.401–68.406 (Defensible Space for Fire Protection Ordinance) and Sections 96.1.004 and 96.1.4907 (Removal of Fire Hazards); and the 2023 Consolidated Fire Code, as well as applicable General Plan policies. In addition, the Cannabis Program proposes amendments to County Regulatory Code, including Section 21.2508(a), which requires commercial cannabis facilities to obtain all applicable zoning and land use entitlements, including approval from the local fire authority. As required by the San Diego County Fire Authority, building and grading plan forms, including fire code plan check requirements, would be necessary for all new buildings, as well as compliance with the 2023 Consolidated Fire Code for the fire protection districts in San Diego County.

Compliance with existing regulations and processes would ensure that cumulative contributions to wildfire hazards from implementation of the Cannabis Program under Alternatives 2 through 5 would be minimized and would not exacerbate existing wildfire hazards. Therefore, the contribution of the Cannabis Program to significant cumulative impacts related to exacerbating wildfire hazards would be less than cumulatively considerable for Alternatives 2 through 5.

2.19.4.3 *Issue 3: Install Infrastructure That Exacerbates Wildfire Risk*

The San Diego County General Plan Update Final EIR identified cumulatively considerable impacts associated with wildland fires from implementation of the General Plan (County of San Diego 2011).

A vast majority of the county, including the program area, includes areas designated as Tier 3 and Tier 2 areas on the CPUC Fire-Threat Map. Tier 3 areas are at extreme risk for wildfire while Tier 2 areas are at elevated risk for wildfire. Similar to Issue 1, given the substantial amount of area designated as High and Very High FHSZs as well as Tier 2 and 3 areas in the unincorporated county, cumulative impacts related to exacerbating wildfire risk from the installation and maintenance of infrastructure within the geographic scope are cumulatively significant.

Alternative 1 would allow the 5 existing commercial cannabis facility in the unincorporated county to expand their existing facilities and operations to a total of 10,000 square feet of building area. However, no new commercial cannabis operations would be allowed. Because these improvements would occur at existing commercial cannabis facilities currently served by

existing infrastructure, they would not represent a new commercial cannabis use that would exacerbate existing wildfire hazards or result in temporary or ongoing impacts to the environment from the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities). Therefore, implementation of the Cannabis Program under Alternative 1 would not result in cumulative impacts related to exacerbating wildfire hazards from the installation of infrastructure. This impact would not be cumulatively considerable for Alternative 1.

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 designated as High and Very High FHSZs or WUI areas. The development of future commercial cannabis projects in these areas could include improvements, such as new buildings; water storage structures; maintenance of fuel breaks; on-site roadway improvements; and water, wastewater, stormwater drainage, electric power, natural gas (where available), and telecommunication facilities, as needed based on site-specific conditions. Extension of these infrastructure facilities is expected to be limited because they are generally available along roadway frontage of the parcels or may be accommodated on the site. As discussed in Section 2.19.3.6, “Issue 3: Install Infrastructure that Exacerbates Wildfire Risk,” proposed commercial cannabis facilities would be subject to compliance with the fire regulations identified above, including the fire protection requirements under PRC Section 4427, which would be implemented during construction of infrastructure improvements. Compliance with the state and local regulations would be minimized and would not exacerbate existing wildfire hazards or result in temporary or ongoing impacts to the environment from the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities). Compliance with existing regulations and processes would ensure that implementation of the Cannabis Program under Alternatives 2 through 5 would not exacerbate existing wildfire hazards or result in temporary or ongoing impacts to the environment from the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities). Therefore, the contribution of the Cannabis Program under Alternatives 2 through 5 to significant cumulative impacts related to installing infrastructure that would exacerbate wildfire hazards would be less than cumulatively considerable.

2.19.4.4 *Issue 4: Expose People or Structures to Post-Fire Risks*

Similar to Issue 1, given the substantial amount of area designated as High and Very High FHSZs in the unincorporated county, cumulative impacts related to exposing people or structures to post-fire hazards within the geographic scope are significant.

Alternative 1 would allow the 5 existing commercial cannabis facility in the unincorporated county to expand their existing facilities and operations to a total of 10,000 square feet of building area. However, no new commercial cannabis operations would be allowed. Because these improvements would occur at existing commercial cannabis facilities currently served by existing infrastructure, they would not represent a new commercial cannabis use that would have the potential to expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, implementation of the Cannabis Program under Alternative 1 would not result in cumulative impacts related to post-fire hazards. This impact would not be cumulatively considerable for Alternative 1.

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 designated as High and Very High FHSZs or WUI areas. Future commercial cannabis projects located on post-fire land areas could further destabilize soil and slope conditions from site development. The development of future commercial cannabis projects in these areas could have the potential to exacerbate post-fire hazards. As discussed in Section 2.19.3.7, "Issue 4: Expose People or Structures to Post-Fire Risks," proposed commercial cannabis facilities would be required to comply with SWRCB Order WQ 2023-0102-DWQ; the County's Grading, Clearing, and Watercourses Ordinance; and the California Building Code, which includes implementation of soil stability and erosion control features and requirements that would also apply to post-fire conditions. Compliance with existing regulations and processes would ensure that implementation of the Cannabis Program under Alternatives 2 through 5 would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, the contribution of the Cannabis Program to significant cumulative impacts related to post-fire hazards would not be cumulatively considerable for Alternatives 2 through 5.

2.19.5 Significance of Impacts Prior to Mitigation

2.19.5.1 *Issue 1: Increase Risk of Wildland Fire Ignition*

Under Alternatives 1 through 5, the Cannabis Program would result in a less-than-significant impact related to increasing the risk of wildland fire ignition and exposing people or structures to significant risk of loss, injury, or death involving wildland fires. The Cannabis Program would not result in a cumulatively considerable impact related to increasing the risk of wildland fire ignition.

2.19.5.2 *Issue 2: Exacerbate Wildfire Risks Due to Slope, Prevailing Winds, and Other Factors*

Under Alternatives 1 through 5, implementation of the Cannabis Program would result in a less-than-significant impact related to exacerbating wildfire hazards. The Cannabis Program would not result in a cumulatively considerable impact related to exacerbating wildfire hazards.

2.19.5.3 *Issue 3: Install Infrastructure That Exacerbates Wildfire Risk*

Under Alternatives 1 through 5, implementation of the Cannabis Program would result in a less-than-significant impact related to installing infrastructure that exacerbates wildfire risk. The Cannabis Program would not result in a cumulatively considerable impact related to installing infrastructure that exacerbates wildfire risk.

2.19.5.4 *Issue 4: Expose People or Structures to Post-Fire Risks*

Under Alternatives 1 through 5, implementation of the Cannabis Program would result in a less-than-significant impact related to exposing people or structures to post-wildfire hazards. The Cannabis Program would not result in a cumulatively considerable impact related to installing infrastructure that exposing people or structures to post-wildfire hazards.

2.19.6 Mitigation

2.19.6.1 *Issue 1: Increase Risk of Wildland Fire Ignition*

No mitigation is required.

2.19.6.2 *Issue 2: Exacerbate Wildfire Risks Due to Slope, Prevailing Winds, and Other Factors*

No mitigation is required.

2.19.6.3 *Issue 3: Install Infrastructure That Exacerbates Wildfire Risk*

No mitigation is required.

2.19.6.4 *Issue 4: Expose People or Structures to Post-Fire Risks*

No mitigation is required.

2.19.7 Conclusion

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

2.19.7.1 *Issue 1: Increase Risk of Wildland Fire Ignition*

Alternative 1 would allow for the 5 existing commercial cannabis facilities in the unincorporated county to expand their existing facilities and operations to a total of 10,000 square feet of building area. However, no new commercial cannabis operations would be allowed. Because these improvements would occur at existing commercial cannabis facilities located in urban and rural developed areas, they would not represent a new commercial cannabis use that would increase the risk of wildland fire ignition that would expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. Therefore, impacts would be less than significant under direct and cumulative conditions under Alternative 1.

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 designated as High and Very High FHSZs or WUI areas. The development of future commercial cannabis projects in these areas would have the potential to increase the risk of wildland fire ignition. Proposed commercial cannabis facilities would be subject to state and local regulations and General Plan policies to ensure that they would not exacerbate existing wildfire hazards. In addition, the Cannabis Program proposes amendments to County Regulatory Code, which includes Section 21.2508(a) that requires commercial cannabis facilities to obtain all applicable zoning and land use entitlements, including approval from the local fire authority. As required by the San Diego County Fire Authority, building and grading plan forms, including fire code plan check requirements, would be necessary for all new buildings, as well as compliance with the 2023 Consolidated Fire Code for the fire protection districts in San Diego County. Compliance with existing regulations and processes would ensure

that implementation of the Cannabis Program under Alternatives 2 through 5 would not increase the risk of wildland fire ignition that would expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. Therefore, the impact would be less than significant under direct and cumulative conditions under Alternatives 2 through 5.

2.19.7.2 *Issue 2: Exacerbate Wildfire Risks Due to Slope, Prevailing Winds, and Other Factors*

Alternative 1 would allow for the 5 existing commercial cannabis facilities in the unincorporated county to expand their existing facilities and operations to a total of 10,000 square feet of building area. However, no new commercial cannabis operations would be allowed. Because these improvements would occur at existing commercial cannabis facilities located in urban and rural developed areas, they would not represent a new commercial cannabis use that would exacerbate wildfire risks due to slope, prevailing winds, or other factors. Therefore, impacts would be less than significant under direct and cumulative conditions under Alternative 1.

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 designated as High and Very High FHSZs or WUI areas. The development of future commercial cannabis projects in these areas would have the potential to exacerbate wildfire hazards. Proposed commercial cannabis facilities would be subject to state and local regulations and General Plan policies to ensure that they would not exacerbate existing wildfire hazards. In addition, the Cannabis Program proposes amendments to the County Regulatory Code, which includes Section 21.2508(a) that requires commercial cannabis facilities to obtain all applicable zoning and land use entitlements, including approval from the local fire authority. As required by the San Diego County Fire Authority, building and grading plan forms, including fire code plan check requirements, would be necessary for all new buildings, as well as compliance with the 2023 Consolidated Fire Code for the fire protection districts in San Diego County. Compliance with existing regulations and processes would ensure that implementation of the Cannabis Program under Alternatives 2 through 5 would not exacerbate existing wildfire hazards due to slope, prevailing winds, or other factors and therefore, would not expose project occupants to pollutant concentrations. Therefore, the impact would be less than significant under direct and cumulative conditions under Alternatives 2 through 5.

2.19.7.3 *Issue 3: Install Infrastructure That Exacerbates Wildfire Risk*

Alternative 1 would allow the 5 existing commercial cannabis facility in the unincorporated county to expand their existing facilities and operations to a total of 10,000 square feet of building area. However, no new commercial cannabis operations would be allowed. Because these improvements would occur at existing commercial cannabis facilities currently served by existing infrastructure, they would not represent a new commercial cannabis use that would exacerbate existing wildfire hazards or result in temporary or ongoing impacts to the environment from the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities). Therefore, impacts would be less than significant under direct and cumulative conditions under Alternative 1.

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 designated as High and Very High FHSZs or WUI areas. The development of future commercial cannabis projects in these areas could include improvements, such as new buildings, water storage structures, maintenance of fuel breaks, onsite roadway improvements, and water, wastewater, stormwater drainage, electric power, natural gas (where available), and telecommunication facilities, as needed based on site-specific conditions. Extension of these infrastructure facilities is expected to be limited because they are generally available along roadway frontage of the parcels or may be accommodated on the site. Proposed commercial cannabis facilities would be subject to state and local regulations and General Plan policies to ensure that they would not exacerbate existing wildfire hazards. In addition, the Cannabis Program proposes amendments to the Zoning Ordinance that would prohibit lights in agricultural shade/crop structures and require controls to mixed-light operations, which would reduce the potential creation of new ignition sources that could exacerbate wildfire hazards. Compliance with existing regulations and processes would ensure that implementation of the Cannabis Program under Alternatives 2 through 5 would not exacerbate existing wildfire hazards or result in temporary or ongoing impacts to the environment from the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities). Therefore, the impact would be less than significant under direct and cumulative conditions under Alternatives 2 through 5.

2.19.7.4 *Issue 4: Expose People or Structures to Post-Fire Risks*

Alternative 1 would allow the 5 existing commercial cannabis facility in the unincorporated county to expand their existing facilities and operations to a total of 10,000 square feet of building area. However, no new commercial cannabis operations would be allowed. Because these improvements would occur at existing commercial cannabis facilities currently served by existing infrastructure, they would not represent a new commercial cannabis use that would have the potential to expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, impacts would be less than significant under direct and cumulative conditions under Alternative 1.

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 designated as High and Very High FHSZs or WUI areas. Future commercial cannabis projects located on post-fire land areas could further destabilize soil and slope conditions from site development. The development of future commercial cannabis projects in these areas could have the potential to exacerbate post-wildfire hazards. Proposed commercial cannabis facilities would be required to comply with SWRCB Order WQ 2023-0102-DWQ; the County's Grading, Clearing, and Watercourses Ordinance; and the California Building Code, which includes implementation of soil stability and erosion control features and requirements that would also apply to post-fire condition. Compliance with existing regulations and processes would ensure that implementation of the Cannabis Program under Alternatives 2 through 5 would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, the impact would be less than significant under direct and cumulative conditions under Alternatives 2 through 5.

Table 2.19.2 Wildfire Risk in the Unincorporated County

FHSZ Designation	Acreage
High	129,138
Moderate	184,346
Very high	879,265
Total	**1,192,749**

Sources: Data downloaded from CAL FIRE in 2023, SanGIS in 2021, and San Diego County in 2023; compiled by Ascent in 2024.

Table 2.19.3 Major Wildfires in San Diego County 2003–2024

Fire Name	Year	Acres Burned	Structures Destroyed	Structures Damaged
Cedar Fire	2003	280,278	5,171	63
Paradise Fire	2003	57,000	415	15
Otay Fire	2003	46,291	6	0
Roblar (Pendleton)	2003	8,592	0	0
Mataguay Fire	2004	8,867	2	0
Horse Fire	2006	16,681	NA	NA
Witch Creek Fire	2007	197,990	1,125	77
Harris Fire	2007	90,440	255	12
Poomacha Fire	2007	49,410	139	NA
Ammo Fire	2007	21,004	NA	NA
Rice Fire	2007	9,472	208	NA
May 2014 San Diego County Wildfires	2014	26,000	65	19
Border Fire	2016	7,609	18	4
Lilac Fire	2017	4,100	157	64
Valley Fire	2020	16,390	66	NA
Southern Fire	2021	5,366	5	NA
Border 32 Fire	2022	4,456	14	NA

Source: County of San Diego 2023a.

Table 2.19.4 Causes of Fire in San Diego County and the State within the SRA (2019–2023)

Year	Area	Total	Arson	Campfire	Debris Burning	Electrical Power	Equipment Use	Lightning	Misc.	Playing with Fire	Railroad	Smoking	Undetermined	Vehicle
2023	San Diego	220	26	1	16	14	24	4	63	3	0	1	43	25
2023	Statewide	3,236	359	47	591	176	348	197	819	32	2	27	321	310
2022	San Diego	239	22	11	12	6	25	6	73	7	0	1	51	25
2022	Statewide	3,333	358	86	488	228	370	89	824	55	6	44	435	350
2021	San Diego	208	22	9	13	16	20	16	26	3	0	3	49	31
2021	Statewide	3,054	386	104	476	284	329	152	269	54	6	60	515	419
2020	San Diego	179	11	2	19	8	28	1	20	7	0	0	56	27
2020	Statewide	3,501	320	110	579	335	381	264	326	80	6	47	604	449
2019	San Diego	128	2	2	17	5	14	9	14	2	0	2	48	13
2019	Statewide	3,086	284	122	468	304	354	195	280	52	3	41	607	376

Source: CAL FIRE 2023c, 2022, 2021, 2020, 2019b.

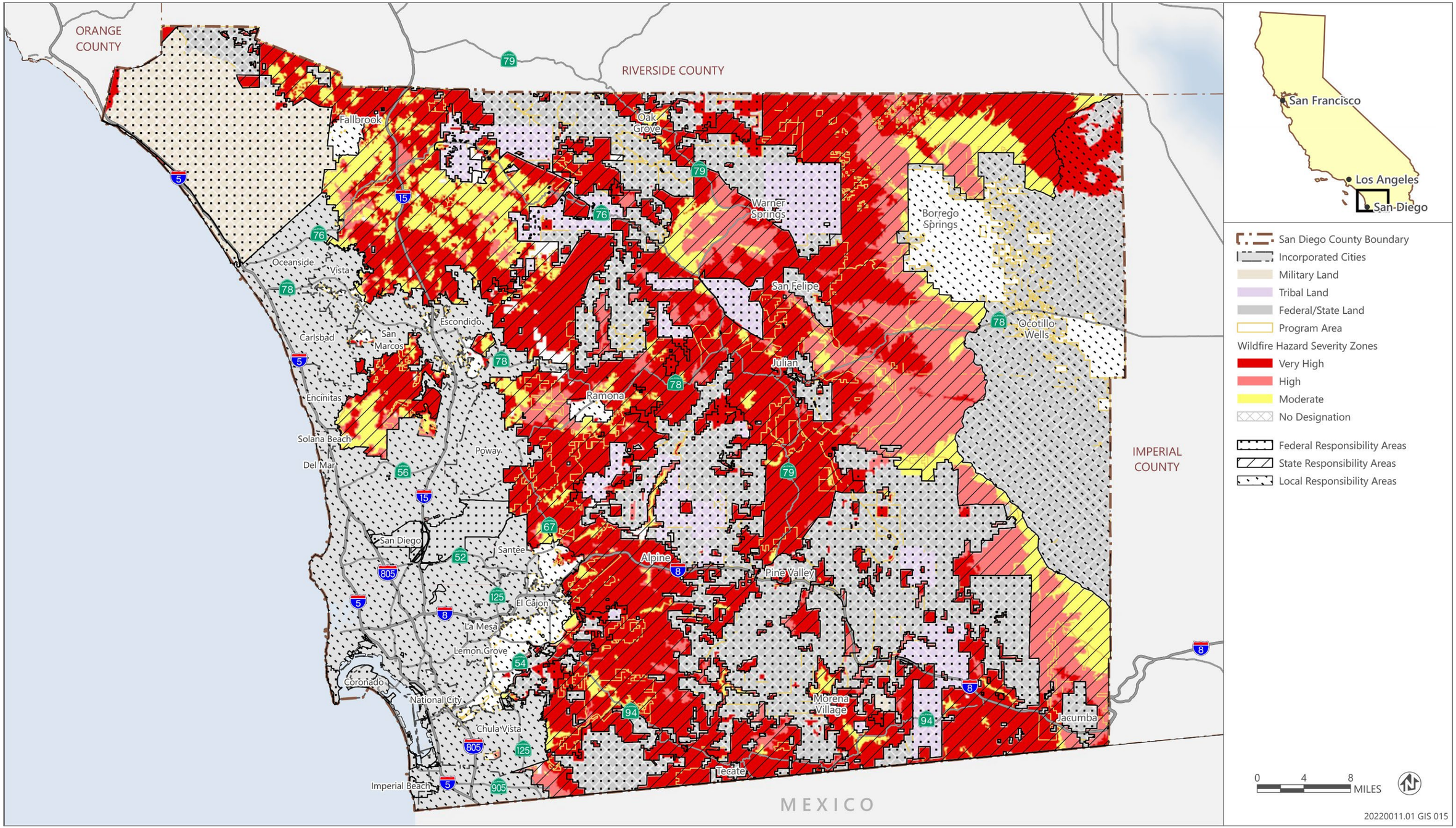
Table 2.19.5 Fire Hazard Severity Zone Area within the Program Area

	Zones	Total Acreage	SRA Very High	SRA High	SRA Moderate	LRA	FRA
Agricultural	A70, A72	489,394	430,398	46,723	4,830	6,999	443
Commercial	C35, C36, C37, C38, C40	2,576	1,048	272	49	1,207	1
Industrial	M50, 52, 54, 56, 58	2,622	1,588	133	107	795	0
	Total	494,592	433,034	47,128	4,985	9,001	444

Notes: SRA = state responsibility area; LRA = local responsibility area; FRA = federal responsibility area.

Source: Compiled by Ascent 2024.

This page is intentionally left blank.



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

Figure 2.19.1 **Fire Responsibility Area and Wildfire Hazard Severity Zones**