

ATTACHMENT D

FINDINGS

ZONE FILE #2022-0085 CALIFORNIA GROWN, INC. CANNABIS USE PERMIT

Upon due consideration of the facts presented in this staff report and at the public hearing for Zone File #2022-0085, the Yolo County Planning Commission finds the following:¹
(A summary of the evidence to support each FINDING is shown in italics)

I. Findings Related to the California Environmental Quality Act (CEQA) and CEQA Guidelines

The Planning Commission finds that the project is consistent with the Cannabis Land Use Ordinance Environmental Impact Report (CLUO EIR) (SCH #2018082055), certified by the Board of Supervisors on September 14, 2021 (Resolution 21-111) and that no further environmental review is needed pursuant to Sections 15168(c), 15162, and 15183 of the California Environmental Quality Act (CEQA) Guidelines based on the following:

Section 15168(c) Findings (Activity Within Scope of CLUO Program EIR)

- 1. The CLUO EIR is a program EIR pursuant to Section 15168 of the CEQA Guidelines.*
- 2. The proposed project is a later activity anticipated in the CLUO EIR and subject to the regulatory controls established through the CLUO.*
- 3. No subsequent EIR would be required under CEQA Guidelines Section 15162 (see Section 15162 Findings, below).*
- 4. Applicable mitigation measures from the CLUO EIR have been integrated into the proposed project and/or imposed on the proposed project.*
- 5. The proposed project is within the scope of the project described in the CLUO EIR, the CLUO EIR adequately describes the activity for purposes of CEQA, and the environmental effects of the proposed project were analyzed within the scope of the CLUO EIR.*

Section 15162 Findings (No Subsequent EIR Required)

- 1. There are no components of the proposed project that will result in new significant impacts or a substantial increase in the severity of previously identified significant impacts that would require substantial revisions to the CLUO EIR.*
- 2. There are no changes to the circumstances under which the proposed project will be undertaken that would require revisions to the CLUO EIR due to new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts.*
- 3. There is no new important information relevant to the proposed project that was not previously known or reasonably could have been known at the time the CLUO EIR was certified that identifies significant impacts not discussed in the CLUO, substantial increases in the severity of previously identified significant impacts, previously infeasible mitigation measures or alternatives that are now*

¹ The findings generally applicable to the granting of a Use Permit under the Yolo County Code do not apply to Cannabis Use Permits, which are subject only to the findings set forth below (Cannabis Land Use Ordinance, Section 8-2.1406(L)).

feasible, that the project proponents decline to adopt, or considerably different and more effective mitigation measures or alternatives that the project proponents decline to adopt.

Section 15183 Findings (Streamlined Environmental Review due to Consistency with Zoning)

1. *The zoning of the project site accommodates the density/intensity of the cannabis land uses allowed under the CLUO which is a zoning regulation comprehensively and cumulatively analyzed in the certified CLUO EIR.*
2. *The CLUO is a uniformly applied development standard of the County (Ordinance 1541, Section 1, adopted September 14, 2021, as amended) adopted based on substantial evidence in the record that the CLUO will substantially mitigate environmental effects when applied to future projects.*
3. *The proposed project has been analyzed for consistency with all requirements of the CLUO and found to be fully compliant, with implementation of identified conditions of approval.*
4. *The proposed project will not result in environmental effects which are peculiar to the project or the parcel on which it will be located.*
5. *The proposed project will not result in significant environmental effects that were not analyzed in the CLUO EIR.*
6. *The proposed project will not result in potentially significant off-site impacts or cumulative impacts which were not addressed in the CLUO EIR.*
7. *There is no substantial new information which was not known at the time the CLUO EIR was certified demonstrating that effects of the proposed project will be more severe than discussed in the CLUO EIR.*
8. *Based on the CLUO Program EIR Checklist / Project Initial Study, no additional environmental review is required because the impacts of the project are not peculiar to the parcel or to the project, have been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards.*

II. Findings Related to the Cannabis Land Use Ordinance (CLUO)

The Planning Commission finds that the proposed project is consistent with the CLUO based on the following:

1. The requested use is a conditionally allowed use in the applicable zone designation.

The requested use is a Cannabis Use Permit to allow issuance of a cannabis cultivation license for up to two acres of canopy for California Grown Inc.. The subject property is zoned Agricultural Intensive (A-N). Pursuant to Article 3, of Chapter 2, of Title 8 of the Yolo County Code, cannabis cultivation is permitted in the A-N zone upon issuance of a use permit. Cannabis cultivation includes activities involving the planting, growing, harvesting, drying, curing, grading, storing, and trimming of cannabis grown onsite.

2. The requested use is consistent with the general plan, and area or specific plan if applicable.

The requested use is consistent with the Yolo County General Plan. Cannabis cultivation is included in the Agriculture (AG) land use designation (Policy LU-1.1, and Table LU-4).

3. The proposed use complies with each of the applicable provisions of the CLUO and other applicable sections of the County Zoning Regulations.

The project has undergone a thorough review against the applicable provisions of the CLUO and Article 3 (Agricultural Zones) of Chapter 2 of Title 8 of the Yolo County Code. The project, as conditioned, is determined to be in compliance with the CLUO and zoning requirements applicable in the Agricultural Zones. The applicable provisions of the CLUO are included as conditions of approval. The operator is required to submit an annual report on July 1 of each year starting the first July in the year after permit issuance documenting compliance with the Cannabis Use Permit requirements.

4. The proposed use, together with the applicable conditions, will not impair the integrity or character of the neighborhood nor be detrimental to the public health, safety, or general welfare.

Cannabis cultivation and associated uses, such as onsite processing, are permitted in agricultural zones with a use permit. The existing outdoor cultivation area is set back approximately 800 feet from the eastern property line and screened from public view along Z Line Road by seven-foot-tall chain link fencing with tan privacy slats and cattle grazing land, and is separated from the road by a slough that runs north/south in the middle of the project parcel.

The California Grown operation has received two formal complaints going back to 2019 (the Department of Community Services maintains complaint data going back to 2019 when the Cannabis Unit was relocated to Community Services). The first complaint was made in 2019 and the second in 2023. Both complaints were largely related to concerns about cannabis odor. Although the complaints were assigned to California Grown, there are two colocated cannabis operations located immediately north of the California Grown property, which may have contributed to the complaints. The 2019 complaint noted that there was a continuous odor for 5-6 weeks and light shining through the hoop houses. The Cannabis Unit investigated the complaint and informed the reporting party that there were no flowering plants on the site at the time of the complaint and that there are no lights in the hoop houses, and that they would continue to monitor the situation. The 2023 complaint related to the odors associated with the harvest. The operator was notified of the complaint and said they would consider planting a less odorous strain the following cultivation season. As conditioned, the project will implement best management practices outlined in the Odor Control Plan prepared for the site. The Odor Control Plan prepared for the site lists passive odor control measures including, planting odor-absorbing companion plants such as lavender, basil, or rosemary, strategic pruning of the cannabis plants to reduce the overall odorous biomass, and planting aromatic hedges around the cultivation area to help contain and neutralize cannabis odors if odor meets or exceeds the 7:1 D/T standard.

The operator has prepared a security plan and will implement measures to secure the property, such as security cameras, alarms, and administrative controls. The operator is also required to provide property owners within 1,000 feet of the property line with an operable method of communication with a local or on-site responsible party having prompt access to the site, operations, and activities. This requirement facilitates communication between neighbors related to conditions at the site and operation of the activity.

The project, as conditioned, will therefore not impair the integrity or character of the neighborhood nor be detrimental to the public health, safety, or general welfare.

4.a.The population in the area has been taken into consideration.

The project site is not located within a densely populated area. The site is surrounded by parcels ranging in size from 20 acres to 169 acres. There are approximately 7 residences on agriculturally zoned parcels within 0.5-mile of the project site (residential address points on GIS). The nearest population center is the town of Clarksburg, which is located approximately five miles northeast of the project site. According to 2020 Census data, the total population within the 95612 Zip Code, which includes Clarksburg's agricultural area, is 1,317 persons (505 households).

4.b.The crime rate in the area has been taken into consideration.

Staff reviewed two years of crime rates and statistics provided by the Yolo County Sheriff's Office for the Clarksburg agricultural area. There is nothing to suggest that existing cannabis cultivation activities at the California Grown operation caused a noticeable increase in crime in the Clarksburg agricultural area. Further, the Yolo County Sheriff's Office provided anecdotal information that their office is not aware of any major crimes occurring on licensed cannabis cultivation sites throughout the County.

4.c.The record of nuisance abatements in area has been taken into consideration.

There have been two nuisance complaints reported to the County's Cannabis Unit regarding the California Grown operation dating back to 2019 (the Department of Community Services maintains complaint data going back to 2019 when the Cannabis Unit was relocated to Community Services). As described in Finding #4, the site received one nuisance complaint in 2019 and a second complaint in 2023. The Cannabis Unit investigated both complaints and neither required abatement actions by the operator. The operator was notified of the odor complaints and the nuisance provisions in the Cannabis Land Use Ordinance. The area surrounding the project site is not known to have an unusual amount of reported nuisance complaints, although the potential for additional cannabis odor and potential for additional complaints related to the applicant's operation is possible and was considered a significant and unavoidable impact in the CLUO EIR. The applicant submitted an odor control plan that describes the odor emitting activities and the administrative and passive controls to reduce and control odors to the greatest extent possible.

4.d.Community character has been taken into consideration.

The community character of the area is typical of the rural, working agricultural landscape found throughout the unincorporated county. Cannabis cultivation and associated uses are considered agricultural land uses in the General Plan and allowed with a use permit in the A-N zone. The project, as conditioned, requires the permittee to maintain, manage, and operate the site, all improvements and alterations, and all structures, in good repair, acceptable in appearance, and in a reasonable safe condition. Cannabis cultivation and ancillary activities are screened from public view and not visible from Z Line Road. Measures are in place to protect the rural night sky by requiring exterior lighting to be full cut-off, shielded, and downward facing.

4.e.Community support has been taken into consideration.

A Courtesy Notice was mailed to property owners within 1,000 feet of the property boundary of the subject parcel on July 7, 2023. Additionally, the Courtesy Notice was emailed to the interested parties list maintained by the Planning Division on July 7, 2023. Staff received two comments from two members of the public who raised concerns about expanding the cultivation area from one to two acres of canopy for the license and thereby increasing the cannabis odors in the area, which

are not contained due to the nature of outdoor cultivation. One of the comments also questioned whether there had been considerations for the applicant/operator to install charcoal and HEPA filters to reduce the odor traveling offsite. The project site is located in a flood hazard area making the use of greenhouses equipped with charcoal and HEPA filters infeasible due to FEMA building restrictions in a flood zone. The comments also raised concerns about the potential for adjacent parcels' property values to decrease and for crime to increase in the area and noted that the County's Sheriff Deputies response to the site could be delayed due to the site's remote location and limited number of deputies. The remaining concerns addressed in the neighbors' comment letters can be alleviated to the greatest extent possible by operational oversight of odor control measures, as needed, site maintenance and security measures as required in the Conditions of Approval.

Staff also received comments from two local agencies. The Delta Stewardship Council received the request for comments and determined, based on the project description and location, that a covered action comment letter is not applicable to the project and therefore provided no comments. Reclamation District 999 commented that the District does not support any expansion of the current operation, noting past issues related to maintaining the levee in coordination with Department of Water Resources, issues with the operator installing a gate with a private lock which prevented levee maintenance at various times, and failure to pay their annual RD 999 assessment fees, and noted the administrative burden caused by delinquency of assessment fees. Staff discussed RD 999's comments with the president of the District's Board of Trustees and the District's concerns with the project request with the operator to ensure that the operator understands that cannabis operations cannot preclude RD 999's levee maintenance responsibilities and that assessments must be paid on time and in full.

The project site is located in the Clarksburg Citizens Advisory Committee (CCAC) comment area. The project was discussed at the CCAC Meeting on May 23, 2024. The CCAC recommended approval of the use permit request by a vote of 3-2-0. Prior to the vote to recommend approval, the discussion centered around cannabis odors and other common agricultural odors, floodplain development restrictions, and the importance of timely payment of RD 999 assessments, as well as other taxes and fees to the County.

Community member and local agency input informed staff's recommendation to allow for only one acre of cannabis canopy for the cultivation license.

5. Adequate utilities, access roads, drainage, sanitation, and/or other necessary facilities will be provided, as required in applicable County and State regulations, standards, and specifications.

The project is conditioned to achieve Valley Clean Energy ultra-green or equivalent standard for electric power (100 percent renewable and 100 percent carbon-free). The project is conditioned to require the permanent power source, whether solar or PG&E, to be operational within six months of project approval.

Access to the property is from a compacted gravel road via Z Line Road, with internal gravel roads leading to the cultivation site. A new onsite wastewater treatment system (septic system) may be required for a new permanent restroom if required by the Environmental Health Division unless site constraints (i.e., FEMA compliance) make it infeasible. Site drainage is reviewed during the building permit process. The project, as conditioned, provides adequate utilities, access roads, drainage, sanitation, and other necessary facilities as required in applicable county and state regulations, standards, and specifications.

6. The number of cannabis operations in the area has been taken into consideration.

California Grown is considered an 'Existing Licensee' and the operation is located within the Clarksburg agricultural area, an area that is not identified in the CLUO EIR as overconcentrated based on the number of issued licenses in the area at the time the CLUO was adopted. At the time the CLUO EIR was circulated for public review in 2019, there were 3 existing and/or eligible cultivation sites in the Clarksburg agricultural area and at the time the CLUO was adopted in 2021, the same 3 issued cultivation licenses remained in the area. The California Grown operator manages all three of the cultivation sites in the area.

The unincorporated area of Yolo County, outside of the Capay Valley, is not considered overconcentrated for Existing Licensees. There is one colocated cannabis operation, managed by the operator of this use permit, immediately north of the project site. As of the date of this public hearing, zero cannabis use permits within the Clarksburg agricultural area have been approved and there are no further applications for cannabis use permits in the Clarksburg agricultural area under review by the County.

7. The proximity of cannabis operations to each other, and/or to other identified sensitive land uses has been taken into consideration.

As described in Finding #6, the operator manages the only three cultivation sites in the Clarksburg agricultural area of unincorporated Yolo County. The three sites are located on adjacent parcels and share employees and deliveries to and from the sites serve both parcels, minimizing traffic to the extent feasible, while maintaining independent onsite infrastructure, such as buildings, cultivation areas, wells, and storage areas.

There are seven agricultural homesites (residential address points on GIS) within 0.5-mile of the California Grown Inc. property boundary. The nearest agricultural homesite is approximately 1,120 feet east of the California Grown property boundary. The California Grown property boundary is approximately five miles southwest of the community of Clarksburg and the western property boundary is adjacent to the Sacramento Deep Water Ship Channel levees.

8. The proximity to adjoining/nearby land uses has been taken into consideration.

The existing cultivation area is located outdoors towards the northern property line of the ±98-acre parcel. The surrounding properties in all directions are agriculturally zoned and are in agricultural production and/or open grazing land, or Reclamation District 999 levees that separate the agricultural areas from the Sacramento Deep Water Ship Channel. The agricultural parcels adjacent to the project site that are not RD 999-maintained levees include: a colocated cannabis operation managed by the applicant is located on the parcel to the north (the area of the parcel to the north that is not used for cannabis operations is used for cattle grazing), the parcel to the south is planted in alfalfa, and the parcel to the east is planted in wheat. The cultivation area occupies an approximately 6-acre portion of the total ±98-acre parcel. The project will comply with the CLUO buffer requirements from sensitive land uses (i.e., 600 feet from outdoor cannabis uses to off-site agricultural homesites).

9. The compliance history of the applicant and/or operator has been taken into consideration.

The Department of Community Services, Cannabis Unit, maintains compliance and complaint history dating back to 2019 when the cannabis program moved from the Agriculture Department to the Department of Community Services. The operator received a Notice of Violation on August 20, 2019, for exceeding one-acre of cannabis canopy. The applicant appealed the Notice of

Violation, but the violation was upheld by the hearing officer. Therefore, the canopy exceeding the one-acre limit was abated in the presence of Yolo County Cannabis Unit staff. California Grown has not received any other Notices of Violation.

The operator received a Building Code violation on June 5, 2020, related to constructing a shade structure between the two onsite shipping containers without building permit approval from Yolo County Building Division. This violation was rectified, and the code enforcement case was closed. As described Finding #4 and #4c, there have been two formal complaints lodged against the cannabis operation—one in 2019 and one in 2023. Both complaints were largely related to concerns about cannabis odor. The CLUO addresses odor impacts through limiting the location of cannabis uses, and establishing buffers for outdoor cannabis uses, odor control requirements, and enforcement procedures. However, while these measures may minimize the likelihood of nuisance odors, the potential for odors to occur remains and was considered a significant and unavoidable impact in the CLUO EIR. The Odor Control Plan prepared for the site lists passive odor control measures including, planting odor-absorbing companion plants such as lavender, basil, or rosemary, strategic pruning of the cannabis plants to reduce the overall odorous biomass, and planting aromatic hedges around the cultivation area to help contain and neutralize cannabis odors if odor meets or exceeds the 7:1 D/T standard.

All operators are required to pay applicable taxes, described in the Cannabis Land Use Ordinance Section 8-2.1410(E), in a timely manner, as they become due. Failure to pay the monetary obligations can result in the modification or revocation of an approved Cannabis Use Permit, following a noticed public hearing. During the application processing, staff received a comment letter from Reclamation District 999 detailing a history of delinquent payments to the District. The delinquent payments result in Reclamation District 999 staff sending a letter to the property owner detailing the late payments and charging an additional penalty and interest fee on the original amount due, as well as resulting in an additional administrative burden to District staff to produce the letter detailing the late payments and corrective actions. In three separate years, the District filed a lien on the property so that the District's assessment would be collected as a part of the County's tax assessment, for which the District is then reimbursed. Staff discussed the RD 999 assessment payment history with the District's President of the Board of Trustees at length and noted that approval of the Use Permit requires timely payment of all applicable taxes or the applicant/operator risks modification or revocation of the Use Permit.

Staff coordinated with County Department of Financial Services to produce a history of cannabis and property tax payments for the site, which verified that there is also a history of late payments for both cannabis and property taxes. The applicant/operator was notified by staff that the Cannabis Land Use Ordinance and Cannabis Licensing Ordinance requires timely payments of all monetary obligations, including reclamation district assessments, cannabis taxes, and property taxes, or the Use Permit could be modified or revoked. It should be noted that the colocated cannabis operation directly north of California Grown, which is operated by family members of Anthony Vasquez, also have a history of delinquent property tax, cannabis tax, and RD 999 assessments. As of the preparation of these Findings, all cannabis taxes and property taxes have been paid.

Ultimately, the history of late payments informed staff's recommendation to not recommend approval of the requested canopy expansion, as the additional canopy would result in additional monetary obligations and additional administrative burden to the operator, which are compounded by the fact that the Vasquez family faces these same concerns on the colocated cannabis operation to the north. Staff also informed the applicant that oversights related to past violations, Building Code and Cannabis Notice of Violations, do not demonstrate an understanding of compliance with Cannabis Land Use Ordinance requirements and contributed to the

recommendation to not increase the canopy for the license. Staff communicated this to the operator and made clear that the applicant/operator needs to demonstrate that payments will be made on time, and for the correct amount, to all the appropriate entities, and comply with all sections of the Cannabis Land Use Ordinance and Cannabis Licensing Ordinance, or risk enforcement actions by the County.

10. Parcel size and proposed uses on the non-cannabis portion(s) of the parcel have been taken into consideration.

The ±98-acre subject parcel is generally flat and contains two pre-engineered 6,000 sf FEMA-compliant agricultural buildings used for drying and processing cannabis, a 1,000 gallon water tank, a 500 gallon propane tank, two storage containers, a graveled driveway and paved parking area, and is enclosed in a seven-foot-tall chain link fence with tan privacy slats. The cultivation area will be confined to an approximately 6-acre operational area. The remaining 91 agricultural acres are used for cattle grazing and the entire property is fenced.

11. Subject matter input relevant to the specific location or proposed project from County department and division heads, and the Cannabis Unit have been taken into consideration. This shall include information and recommendations from the Agricultural Commissioner relevant to compatibility of proposed cannabis cultivation with adjoining non-cannabis crops.

Subject matter input from County department and division heads have been taken into consideration when analyzing the project. Project specific conditions of approval from the Public Works Division, Environmental Health Division, and Building Division have been incorporated into the project. Additionally, the Cannabis Unit has provided information about compliance history (see Finding #9).

The Agricultural Commissioner reviewed the project application materials and determined that the project does not create a potential for conflict with adjacent and nearby properties and their associated crops. The surrounding land uses in all directions are zoned A-N and are in agricultural production and/or open grazing land, or Reclamation District 999 maintained levees. RD 999's comment letter is described in Finding #9 and informed staff recommendation to not recommend approval of a cannabis canopy expansion for the license.

12. Other cultural, social, equity, and environmental justice concerns deemed applicable by the County have been taken into consideration.

The CLUO establishes the regulatory framework for permitting cannabis related uses in a transparent and equitable process. The use permit process allows for fairness, regardless of race, color, national origin or income, and the meaningful involvement of community in the decision-making process. The County has not deemed additional cultural, social, equity, and environmental justice concerns applicable, as this project is not located in a disadvantaged community and the project will not exacerbate over-concentration of cannabis use permits in the Clarksburg agricultural area. The operator was provided an equitable opportunity to apply for a Cannabis Use Permit pursuant to the CLUO, and the public was provided opportunities to comment on the project and participate in a public meeting at the May 23, 2024, Clarksburg Citizens Advisory Committee meeting, and participate in a public hearing at the October 10, 2024, Planning Commission meeting.

13. Site efficiency and use of the site to minimize following of agricultural land has been taken into consideration.

The existing cultivation area is located within an approximate 6-acre operational area, which is approximately 115 feet from the northern property line. The 6-acre operational area is surrounded by a seven-foot-tall chain link fence with tan privacy slats and includes space that could accommodate the applicant's proposed canopy expansion. Because the project area was designed to include potential future expansion areas, no new land will be fallowed as a result of approval of the project. The cultivation area is located outdoors at the north side of a relatively flat pasture and has been previously used for cattle grazing. The remaining property remains used for cattle grazing. The project is conditioned to require that the site is kept free of litter and clutter and to maintain all improvements and structures.

III. Findings Related to the Williamson Act

The subject project site is under Williamson Act Contract (Land Use Agreement #72-038). The Williamson Act (Gov't Code § 51200 et seq.) requires that the property be used for agricultural and open space uses, or uses that are compatible with agriculture. The CLUO recognizes cannabis cultivation and related activities as agricultural land uses. See Yolo County Code of Ordinances § 8-2.1404(E). To the extent that any of the project's proposed uses are not agricultural uses, the Williamson Act and the County's Williamson Act Guidelines set forth three "principles of compatibility" that non-agricultural uses on contracted lands must be consistent with. See Government Code § 51238.1. Accordingly, the Planning Commission makes the following findings:

1. The use will not significantly compromise the long-term productive agricultural capability of the subject contracted parcel or parcels or on other contracted lands in agricultural preserves.

Approval of the project will not significantly compromise the long-term productive agricultural capability of the subject parcel or other contracted lands in agricultural preserves. Cannabis cultivation uses are included in the Agriculture land use designation in Countywide General Plan. The project proposes adding approximately to one acre of canopy, and two additional, pre-engineered 6,000 sf FEMA-compliant agricultural buildings used for drying and processing cannabis, for a total of two acres of mature canopy on the ±98-acre parcel. The approximate total land disturbance of cannabis activities, including existing and proposed cultivation footprint in addition to existing structures, is approximately 6-acres as all cannabis activities will remain within the existing operational area.

2. The use will not significantly displace or impair current or reasonably foreseeable agricultural operations on the subject contracted parcel or parcels or on other contracted lands in agricultural preserves. Uses that significantly displace agricultural operations on the subject contracted parcel or parcels may be deemed compatible if they relate directly to the production of commercial agricultural products on the subject contracted parcel or parcels or neighboring lands, including activities such as harvesting, processing, or shipping.

The proposed project will not significantly displace or impair current or reasonably foreseeable agricultural operations on the subject contracted parcel or on other contracted lands in agricultural preserves. The proposed expansion of cultivation will occur on lands immediately adjacent to existing cannabis cultivation areas, and pre-engineered 6,000 sf FEMA-compliant agricultural buildings used for drying and processing cannabis will be constructed on portions of the parcel that have been previously disturbed, within the existing 6-acre operational area. The project is

expected to support, not compromise or displace, the long-term agricultural capability of the land by encouraging the continuation of the land's productivity through cultivation of cannabis crops.

3. The use will not result in the significant removal of adjacent contracted land from agricultural or open-space use.

Lands to the east, south, and north of the project site are under Williamson Act contract. The parcels to the west are not under contract as they are Reclamation District 999-manged levees. Experience from the project's existing cannabis cultivation activities (since 2017) indicates that adjacent contracted land is not affected by the operations, and there is no evidence that the project will result in the removal of adjacent land from agricultural use.