

ATTACHMENT D

FINDINGS ZONE FILE #2023-041 YOLO GARDENS CANNABIS USE PERMIT

Upon due consideration of the facts presented in this staff report and at the public hearing for Zone File #2023-041, the Yolo County Planning Commission finds the following:¹

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 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

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)).

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

The Planning Commission finds that the proposed project is consistent with the Cannabis Land Use Ordinance (CLUO) based on the following:

(A summary of the evidence to support each FINDING is shown in italics)

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 cultivation canopy. 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 and processing uses are 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 uses are 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 Cannabis Land Use Ordinance and other applicable sections of the County Zoning Regulations.

The project has undergone a thorough review against the applicable provisions of the Cannabis Land Use Ordinance (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 CLUO allows existing licensees to request buffer exceptions if they cannot meet required buffer distances from cannabis uses to off-site CLUO sensitive land uses. Buffer exceptions are reductions of more than ten percent of the required buffer distances from CLUO sensitive land uses. The required buffer for outdoor cannabis uses from off-site individual legal residences in non-residential zones is 600 feet measured from the closest point of any outdoor area containing cannabis. Yolo Gardens is requesting a buffer exception to allow outdoor cannabis cultivation within 530 feet of a residence to the southwest in the Agricultural Intensive (A-N) zone on APN: 025-130-004, an approximately 12% reduction of the 600-foot buffer requirement. The proposed expansion of the outdoor cannabis cultivation area to the south of the existing hoop houses will not encroach closer to the residence in the A-N zone to the southwest.

The affected property owner to the southwest has provided a statement that they do not object to the reduced buffer exception request. The applicant has operated within 600 feet of the neighbors' residence for several years and has done so without complaint from the affected neighbor.

The applicable provisions of the Cannabis Land Use Ordinance 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 are permitted in agricultural zones with a Use Permit. Yolo Gardens has been cultivating cannabis on an annual basis under validly issued county and state licenses since 2018. The project site is located in an agriculturally zoned area and surrounding land uses are generally agricultural, with an almond orchard to the north and west, a tomato field to the east, and a cannabis operation (Walnut Oaks) to the south. The Use Permit application for the Walnut Oaks cannabis operation to the south is on hold and did not seek license renewal in 2025. The Yolo Gardens property

contains a 2,214-sf residence occupied by the property owner and a 492-sf shed. The cannabis activities currently occupy approximately three acres of the site. The cultivation area is contained within a previously disturbed footprint and consists of an existing 4,000-sf processing building, eight 300-sf shipping containers for general agricultural storage, one 300-sf pesticide/chemical storage container, ten hoop houses (approx. 18,000-sf) for outdoor cultivation, three 2,400-sf hoop houses for immature plants (vegetation), and an approximately 20,000-sf outdoor cannabis cultivation area which is not currently in use. A new restroom with employee wash station will be added to the existing processing building within a previously disturbed area. No new structures are proposed.

The property includes screening around the 3-acre± cannabis cultivation area via a six-foot-tall chain link fence with green privacy slats to blend in with the natural surroundings, as well as scattered walnut trees around the edge of the cultivation area along the fence line. The cannabis cultivation area is visible from County Road (CR) 21 to the north, which is setback approximately 420 feet from the road, and from CR 96 to the west, which is approximately 0.4 miles away. The Permittee does not propose additional screening and/or fencing, unless determined by the County that further screening is necessary for security.

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. CLUO Section 8-2.1408(E), Buffers, establishes buffers for various identified sensitive uses, including off-site residences, ranging from 600 feet to 1,500 feet. The existing outdoor cultivation areas do not satisfy the buffer requirement for existing licensees to maintain a 600-foot buffer from off-site residences. The operator has submitted a letter of support from the affected neighbor to the southwest (APN: 025-130-004) containing an off-site residence that is approximately 530 feet from the outdoor cultivation area. The outdoor cultivation area is also screened and fenced from the public view along CR 21 to the north and CR 96 to the west.

The operator has prepared a security plan and will implement measures to secure the property, such as security cameras, alarms, security guards (when necessary), 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 operator submitted an odor control plan that describes the odor emitting activities and the administrative and engineering controls to reduce and control odors to the greatest extent possible. If odor nuisances are verified pursuant to the enforcement procedure set forth in the CLUO, the operator may install and maintain the following: an exhaust air filtration system with odor control that effectively minimizes internal odors from being emitted externally; an air system that creates negative air pressure between the facilities interior and exterior so that odors outside of the facility will not exceed the less than 7:1 D/T standard; or other odor control system/methods which effectively minimizes odor to a level compliant with the allowable threshold.

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 agricultural land uses, as described above. The nearest agricultural residence is approximately 530 feet from the nearest extent of the existing outdoor cannabis cultivation area to the southwest. There are approximately 103 residences within 1/2-mile of the project site; approximately 81 homes are located on agriculturally zoned land and 22 residences located on residentially zoned land. These parcels range from approximately 0.5 acres to 77 acres in size. According to 2020 Census data, the total population within the 95696 Zip Code, which includes the City of Woodland, is 38,956 persons (14,439 households). Pursuant to the CLUO, the Yolo Gardens operation is not located within an overconcentrated area.

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

Staff reached out to the Yolo County Sheriff's Office and did not receive a response suggesting that existing cannabis cultivation activities at the Yolo Gardens operation caused an increase in crime in the Woodland/Willow Oak area. Further, the Yolo County Sheriff's Office has previously provided anecdotal information for other Permittees 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 abatement in area has been taken into consideration.

The Yolo County Agriculture Department (Ag Department) responded with concerns regarding multiple complaints their office received about pest pressure and ground squirrel damage to adjacent agricultural properties. The Ag Department conducted a visual assessment of the site and determined that weed growth, nut mummies, and unmaintained and dead trees were harboring pests, such as ground squirrels, Navel Orangeworm, and Walnut Husk Fly.

Yolo Gardens responded to the Ag Department's nuisance abatement letter by removing the walnut orchard with the intent to prepare the land to be farmed in tomatoes. Only a few scattered trees around the perimeter of the cultivation area for screening purposes is remaining. Staff with the Ag Department confirmed that the tree debris has been chipped and removed from the site and that the pest nuisance issue has been resolved. The site had also been disked to address the overgrown weed nuisance issues.

No additional nuisance complaints have been reported to the County's Cannabis Unit regarding the cannabis operations dating back to 2019 (the Department of Community Services Cannabis Unit maintains complaint data going back to 2019 when the Cannabis Unit was relocated to Community Services). Additionally, no Notices of Violation have been issued for the project site. The area surrounding the project site is not known to have an unusual amount of reported nuisance complaints.

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 adhere to buffer requirements from identified sensitive land uses, and 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. Measures are in place to protect the rural night sky by requiring exterior lighting to be full cut-off, shielded, and downward facing. Lighting is not allowed within hoop houses or for any other outdoor cannabis uses.

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 April 26, 2024. Additionally, the Courtesy Notice was emailed to the interested parties list maintained by the Planning Division. Staff received eleven responses from nearby property owners and members of the neighboring Willow Oak community expressing concerns about odor, health and safety, increased traffic and vehicle speed, property values, overgrown weeds onsite creating a fire hazard, pest issues (ground squirrels) caused by the unmaintained walnut orchard onsite (recently removed), and the general condition of the existing dwelling onsite.

As mentioned in Finding #4.c above, the Yolo County Agriculture Department (Ag Department) also responded with concerns regarding multiple complaints submitted to their office regarding pest pressure and ground squirrel damage to adjacent agricultural properties. The applicant responded to the agricultural nuisance complaint by removing the dying orchard to resolve the ongoing issues with ground squirrels and other agricultural pests that were assessed by the Ag Department.

The project site is not located in any Citizens Advisory Committee (CAC) comment area.

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 served by PG&E and is conditioned to achieve Valley Clean Energy ultra-green or equivalent standard (100 percent renewable and 100 percent carbon-free) within six months of project approval.

The Permittee has access to the property via an existing gravel driveway off CR 21 that extends along the eastern boundary of the project site abutting the western boundary of the neighboring parcel (APN 025-130-028), which is under separate ownership. As required by the Public Works Division, the project is conditioned to provide ongoing maintenance of gravel parking areas and access roads to prevent downstream conveyance of sediment and to provide dust control. The site served by an existing on-site wastewater treatment system (septic system) for domestic wastewater, as approved and regulated by the Environmental Health Division. Industrial strength waste (e.g., wastewater from processing) is regulated by the State Regional Water Quality Control Board and is not approved to be discharged into the septic system. The project does not propose any new structures. However, the applicant will be required to install one restroom with employee wash stations, which is proposed in the existing processing building. The Permittee applied for a building permit for this work (BP2020-0449), but it has not been

completed. A condition to complete this work is included as a condition of approval. 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.

Yolo Gardens is considered an 'Existing Licensee' and the operation is located outside of the Capay Valley, an area identified in the CLUO EIR as overconcentrated. The remaining unincorporated area of Yolo County, outside of the Capay Valley, is not considered to be overconcentrated for Existing Licensees. Therefore, the project site is not located in an area considered to be overconcentrated.

The CLUO establishes that an area will be considered overconcentrated when there are seven Cannabis Use Permits within any six-mile diameter area. No new applications would be accepted in areas determined to be overconcentrated (seven Cannabis Use Permits within any six-mile area). The nearest existing/licensed cannabis operation are approximately four miles to the west (Conquest Marketing Group) and 5.4 miles northwest (Yolo Grow #1/Yolo Grow #2). A cannabis operation (Walnut Oaks) is also located immediately south of the project site. The Use Permit application for the Walnut Oaks cannabis operation to the south is on hold and did not seek license renewal in 2025. All other cannabis operations are more than six miles away.

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, above, Yolo Gardens is not located within an area considered to be overconcentrated from a regulatory standpoint. The nearest licensed cannabis operations are approximately four miles west of the project site (Conquest Marketing Group) and 5.4 miles northwest (Yolo Grow #1/Yolo Grow #2). However, a cannabis operation (Walnut Oaks) is located immediately south of the project site. The Use Permit application for the Walnut Oaks cannabis operation to the south is on hold and did not seek license renewal in 2025. All other cannabis operations are more than six miles away. Approval of the Yolo Gardens Use Permit would not result in the area becoming overconcentrated.

The nearest agricultural homesites are located southwest of the extent of the existing outdoor cultivation area, but only the easternmost residence is within the required 600-foot buffer (approximately 530 FT) for legal off-site residences. There are approximately 103 homesites within 0.5 miles of the Yolo Gardens' property boundary. Approximately 81 homes are agricultural homesites and the remaining 22 homes are located in the Rural Residential – 2 Acre (RR-2) zone in the Willow Oak neighborhood. These parcels range from approximately 0.5 acres to 77 acres in size. The CLUO requires a minimum of 600 feet between off-site residences and cannabis cultivation activities. Maintaining the buffer from off-site residences has been made a condition of approval.

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

The surrounding land uses are zoned A-N and are generally agricultural, with an almond orchard to the north and west, a tomato field to the east, and a cannabis operation (Walnut

Oaks) and to the south. The Use Permit application for the Walnut Oaks cannabis operation to the south is on hold and did not seek license renewal in 2025. As described in Finding #4 above, the Yolo Gardens property includes screening around the perimeter of the 3-acre cannabis cultivation area via a six-foot-tall chain link fence with dark green privacy slats and scattered walnut trees around the edge of the cultivation area along the fence line. The Permittee does not propose additional screening and fencing, unless determined by the County that additional screening is necessary for security purposes. The project site is mostly flat with a gentle slope that drains to the east and has been previously disturbed with agricultural uses, such as walnut orchard.

The existing hoop houses and shipping containers are located near the center of the project site along the eastern portion of the property within an existing six-foot-high chain link fence with green privacy slats. The existing processing building is located near the northeast corner of the property behind the existing residence. No new structures are proposed as part of the project, and the new restroom with employee wash stations will be located in the existing processing building within a previously disturbed area. The existing structures meet the required setbacks set forth in the Yolo County Code. The project complies with the CLUO buffer requirements from sensitive land uses.

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

Yolo Gardens first received a cultivation license in 2018. The operator has not received a Notice of Violation. A Courtesy Notice was issued by the Building Division in March 2019 regarding the following observations: electrical added to hoop houses without permit; propane added to hoop houses without permit; and electrical added to containers with permit. The electrical and propane were satisfactorily removed from the hoop houses and the containers as verified by Building Division staff in February 2022.

Five complaints (dated 5/14/2019, 5/15/2029, 5/31/2019, 6/1/2019, and 10/17/2019) regarding odor and light pollution were also lodged against this operation with the Cannabis Unit per records maintained by the Department of Community Services (the Department of Community Services maintains complaint data going back to 2019 when the Cannabis Unit was relocated to Community Services). Cannabis Unit staff were unable to validate the complaints received during their two-to-three-week investigations, which resulted in the cases being closed.

Staff coordinated with the County Department of Financial Services to produce a history of cannabis and property tax payments for the site, which verified that Yolo Gardens, and the property owner, are up to date on their property taxes and cannabis taxes.

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

The subject parcel is ±30.7 acres and is mostly flat with a gentle slope that drains to the east and has been previously disturbed with agricultural uses. Non-cannabis related structures are located on the northeastern portion of the parcel and currently occupies approximately 0.5 acres of the site. Non-cannabis related development includes an existing single-family residence occupied by the property owner and a 492-sf shed. The remaining 30.2 acres includes the cannabis-related structures and amenities including ten existing hoop houses (approximately 18,000-sf) for outdoor cultivation, three 2,400-sf hoop houses for immature plants (vegetation), a 4,000-sf processing building, eight 300-

sf shipping containers, one 300-sf shipping container for general storage, and one 300-sf pesticide/chemical storage container. The property was previously planted in a mature walnut orchard which has been cleared to abate an agricultural pest nuisance (squirrels) and to plant tomatoes. The property includes fencing around the three-acre cannabis cultivation area and access is facilitated via an existing driveway off CR 21 to the north which extends along the eastern boundary of the project site.

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 commented that there are no concerns with fencing, nor any compatibility with surrounding agricultural operations because of the buffer between the row crops and the outdoor cultivation area. However, there is a minor concern for pesticide drift, but the Agricultural Commissioner has not received such complaints. The Agricultural Commissioner did acknowledge that the applicant will have to obtain an Operator ID for pesticide use issued by the Agricultural Commission prior to any application of pesticides. The project has been conditioned to require the applicant to obtain and maintain an Operator ID (OPID-Spray Permit) through the Yolo County Agriculture Department based on the chemicals in their pest management plan, and prior to utilizing Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), Section 25(b) products.

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

Yolo Gardens has been cultivating cannabis annually under validly issued County and State licenses since 2018. 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. 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 November 13, 2025, Planning Commission meeting.

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

The existing buildings and structures that are used to support the cannabis operations are clustered near the eastern portion of the project site within a previously disturbed area with a gravel access road. No additional development is proposed, except for the

installation of one restroom with employee was stations within the existing processing building. The property has traditionally been used for agricultural purposes and the existing cannabis operation encompasses approximately three acres of the project site. The remaining ±27.7 acres are developed with a single-family residence occupied by the property owner and an existing 492-sf shed that are not intended for cannabis use. If the additional one acre of canopy is approved, the cannabis operation will encompass a total of four acres of land. Maintaining the buffer from off-site residences has been made a condition of approval. The project is also 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 #70-147). 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, processing, and distribution uses are included in the Agriculture land use designation in the Countywide General Plan. The project proposes adding one acre of outdoor cannabis cultivation canopy, for a total of two acres of outdoor canopy on the 30.7-acre parcel. The approximate total land disturbance of cannabis activities, including existing and proposed cultivation footprint in addition to existing structures, is approximately four acres. The CLUO EIR considered off-site impacts to agriculture and concluded that there would be no impact with zoning for agricultural use or Williamson Act contracts under any of the alternatives.

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 cultivation activities will occur on lands previously disturbed and adjacent to existing cannabis cultivation areas, and ancillary processing activities will take place in an existing 4,000-sf processing building on portions of the parcel that have previously been disturbed and developed. Continuation of

cannabis cultivation and associated uses are paramount to the project. 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 and ancillary processing of cannabis products, and the cultivation of row crops (tomatoes) on the remaining 26.6 acres not intended for cannabis cultivation activities.

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

Lands immediately surrounding the property are under Williamson Act contract and include an almond orchard to the north and west, a tomato field to the east, and a cannabis operation (Walnut Oaks) to the south that is on hold and did not seek license renewal in 2025. Additionally, there are four parcels in the immediate vicinity of the project site that range from 1.1 to 10 acres in size that are not enrolled in the Williamson Act along CR 21 to the north, and one parcel to the southwest that is landlocked with access off State Route (SR) 16 to the south. Experience from the project's existing cannabis cultivation activities (since 2018) 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.