

Addendum No. 6
Mitigated Negative Declaration
CUP 16-37 and LDP 16-23
Top Quality Strains, Inc.

Minor Conditional Use Permit (MCUP) No. 24-11)



Lead Agency

City of Adelanto Development
Services – Planning Division
11600 Air Expressway
Adelanto, CA 92301

Applicant

Top Quality Strains, Inc.
17459 Muskrat Avenue, Unit 21
Adelanto, CA 92301

CEQA Consultant

EPC Environmental Inc.
11801 Pierce Street, Ste. 200
Riverside CA 92505

November 26, 2024

1.0 PROJECT INFORMATION

Date:	November 26, 2024
Project Title:	Minor Conditional Use Permit (MCUP) No. 24-11
Project Description:	Proposal by Top Quality Strains, Inc. to allow 22,000 square feet of adult-use cannabis in a 29,925-square-foot existing building.
Project Applicant:	Top Quality Strains, Inc.
Location:	17459 Muskrat Avenue, Unit 21, Adelanto, CA 92301 APN: 0459-851-23 See Figure 2, <i>Premise Location Map</i> .
Lead Agency and Contact:	Nyeka Allen, Development Services Coordinator City of Adelanto Community Development Department- Planning Division 11600 Air Expressway, Adelanto CA, 92301 Phone. +1 760-246-2300 Ext 11189 Email: nallen@adelantoca.gov
Active Cannabis Permits/Licenses Issued by the Department of Cannabis Control	CCL21-00005064 (Medium-Indoor Cultivation-Provisional)

2.0 INTRODUCTION

Background

Top Quality Strains Inc. currently operates a cannabis business within an existing industrial park on a 31-acre property located at the northeast corner of Muskrat Avenue and Yucca Road in the City of Adelanto. (See Figure 1, *Project Vicinity Map*.) Credit Holdings, LLC developed the industrial park (the “420 Industrial Park”) in 2017-2018, consisting of 21 industrial condominium units with a maximum allowable square footage totaling 1,260,000. Each condo unit is allowed to occupy up to 59,850 square feet. As shown in Figures 2 through 6, the 420 Industrial Park has been fully developed. All site and infrastructure improvements, including, but not limited to, buildings, parking areas, landscaping, water lines, sewer lines, storm drains, above-ground utilities, gas lines, telecommunication facilities, and street improvements, have been constructed or installed.

Previous CEQA Documents

The 420 Industrial Park received the following land use entitlements and CEQA approvals from the City of Adelanto:

Table 1. Previously Adopted CEQA Documents

City Case No.	Description	Status
Mitigated Negative Declaration for LDP No. 16-23 and CUP No. 16-37	For the construction of the 420 Industrial Park, consisting of 630,000 square feet of buildings on a 31-acre site subdivided into 21 industrial condominium units of 29,925 square feet each.	Adopted 01/17/2017
Addendum No. 1 Modification to LDP No. 16-23 and CUP No. 16-37	To add 630,000 square feet of second-floor space to the previously approved 420 Industrial Park which would allow each unit to expand to 59,925 square feet for a total of 1,260,000 square feet overall. Additionally, CUP No. 16-37 was revised to clarify that adult cannabis uses were conditionally permitted, including volatile manufacturing, in the 420 Industrial Park.	Adopted 12/18/2018
Addendum No. 2 MCUP No. 24-04 Salud Organics, Inc. 7319 Muskrat Avenue, Unit 1.	To convert Provisional License No. CCL200002971 to an annual license.	Adopted 09/03/24
Addendum No. 3 New Genesis Corp. MCUP No.24-07 17323 Muskrat Avenue, Unit 4	Application LCA23-0000289 Medium Indoor Cultivation-Annual	Adopted 10/30/2024

City Case No.	Description	Status
Addendum No. 4 MCUP 24-10 Essential Co, Inc. 17317 Muskrat Avenue, Unit 2 Adelanto, CA 92301	To renew the following licenses: CDPH-10004651 C11-0001336 CCL20-0002580 CCL20-0002581 CCL20-0002582 CCL20-0002583	Adopted 11/25,2024
Addendum No. 5 MCUP 24-08 Caligold, LLC dba Potwest 17455 Muskrat Avenue, Unit 11.	To renew Annual License Nos. CCL21-0000838 - Cultivation-Medium Indoor C11-0001331-LIC -Annual-Commercial -Distributor (Drivers United, LLC).	Adopted 11/18/2024

These documents are now incorporated by reference and can be viewed at the City of Adelanto Development Services-Planning Division, 11600 Air Expressway, Adelanto, CA 91730.

Addendum No. 6 is available by accessing the following link:

https://adelantoca.gov/services/community_development_services/planning/ceqa_process_policy.php#outer-343

Compliance with the California Environmental Quality Act (CEQA).

To obtain or renew an annual license, a Licensee must provide evidence of exemption from or compliance with CEQA. The evidence provided may be a signed copy of a **project-specific** Notice of Determination or Notice of Exemption and a copy of the associated CEQA document.

As noted above, each condominium unit could be sold or leased to future occupants who desire to operate cannabis businesses. At that time, no prospective tenants were identified. Thus, the Adopted MND referenced above analyzed the construction and operation of the industrial park in general, and a project-specific CEQA analysis was not conducted.

Analysis of Project-Specific New Information

The approach employed in this Addendum document is to determine if the new information identified in the application for an annual license submitted to the DCC would require revisions to the Adopted MND due to new information that could not have been known at the time the Adopted MND was approved because no cannabis businesses were operating in the industrial park at that time. The new information provided to the DCC, which is the focus of this analysis, includes, but is not limited to, the following:

- Description of cultivation methods, including a description of whether operations would use mixed-light or exclusively indoor cultivation techniques or some combination of both.
- Source(s) and amounts of water expected to be used for operations.
- Source(s) and amounts of energy expected to be used for operation, including any generators that may be used.
- The quantity of hazardous materials, as defined by Health and Safety Code section 25260, that are stored, used, or disposed of at the project site and a copy of the Hazardous Material Business Plan (HMBP) prepared for the proposed premises, if any.
- A description of the method or methods by which the licensee will dispose of cannabis waste.
- The number of anticipated employees onsite, occupancy during operating hours, and frequency of deliveries or shipments originating from and/or arriving at the project site.

Requirements for the Use of an Addendum

The analysis of new information described above is accommodated by the use of an addendum to the previously adopted MND. CEQA Guidelines section 15164 provides for the use of an addendum to document the basis for a lead agency's decision not to require a subsequent EIR or negative declaration for a project that is already adequately covered in a previous negative declaration. An addendum to a negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.¹ These conditions are summarized below.

(a) There are substantial changes to the project;

(b) There are substantial changes in the project's circumstances; or

(c) New information that could not have been known at the time the MND was certified becomes available, and such changes or new information require major revisions to the previous MND due to new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

¹ CEQA Guidelines: https://www.califaep.org/statute_and_guidelines.php

3.0 PROJECT DESCRIPTION

Approved Project Description

Throughout this document, the term “Approved Project” means the existing industrial park consisting of 21 industrial condominium units with a maximum allowable square footage totaling 1,260,000. Each condo unit is allowed to occupy up to 59,850 square feet. As shown in Figure 2, *Premise Location Map*, the industrial park has been developed. All site and infrastructure improvements, including, but not limited to, buildings, parking areas, landscaping, water lines, sewer lines, storm drains, above-ground utilities, gas lines, telecommunication facilities, and street improvements, have been constructed or installed.

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3.0 Project Description

Figure 1. Approved Project -City Location Map

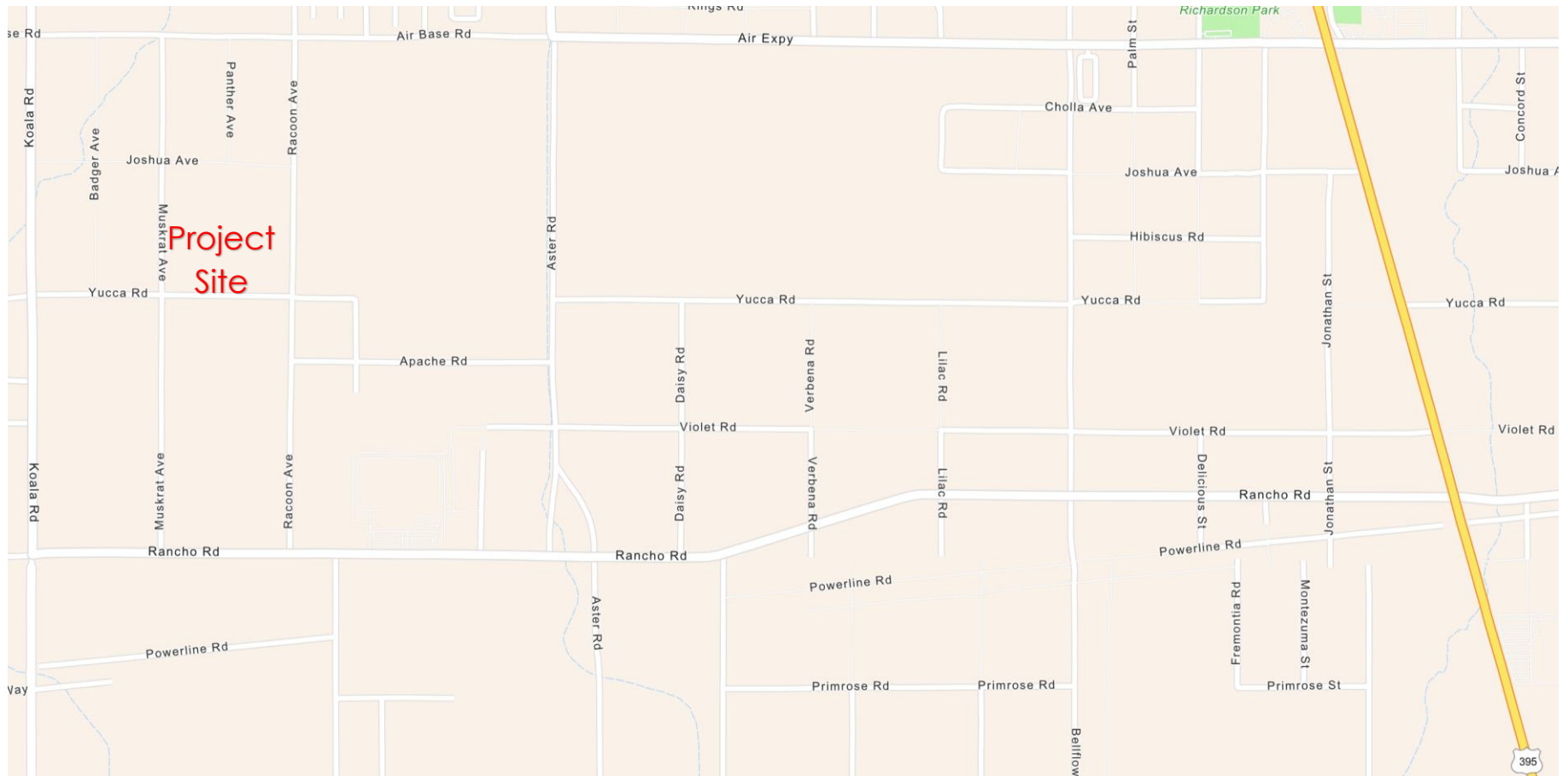


Figure 2. Approved Project - Site Location Map



3.0 Project Description

Figure 3. Approved Project Street View 1



View from the intersection of Muskrat Avenue and Joshua Road.



View from the intersection of Raccoon Avenue and Joshua Road.

3.0 Project Description

Figure 4. Approved Project Street Views 2



View from the intersection of Muskrat Avenue and Yucca Road.



View from the intersection of Yucca Road and Raccoon Avenue.

3.0 Project Description

2.2 Modified Project Description

Throughout this document, the term “Modified Project” means the application to convert a provisional license to an annual license or to renew an annual license, whatever the case may be. The Modified Project does not involve any additions or modifications to the interior or exterior of the premises, nor does it involve an expansion or change in operations as allowed under the existing licenses. Table 1, *Local and State Licenses*, shows the licenses that the Applicant is currently operating under issued by the DCC.

Table 1. State Licenses

License Number	License Type	Expiration Date	Action
CCL21-00005064	Cultivation-Medium Indoor (Provisional)	04/28/25	Convert to Annual

Figure 5. Premise Location Map

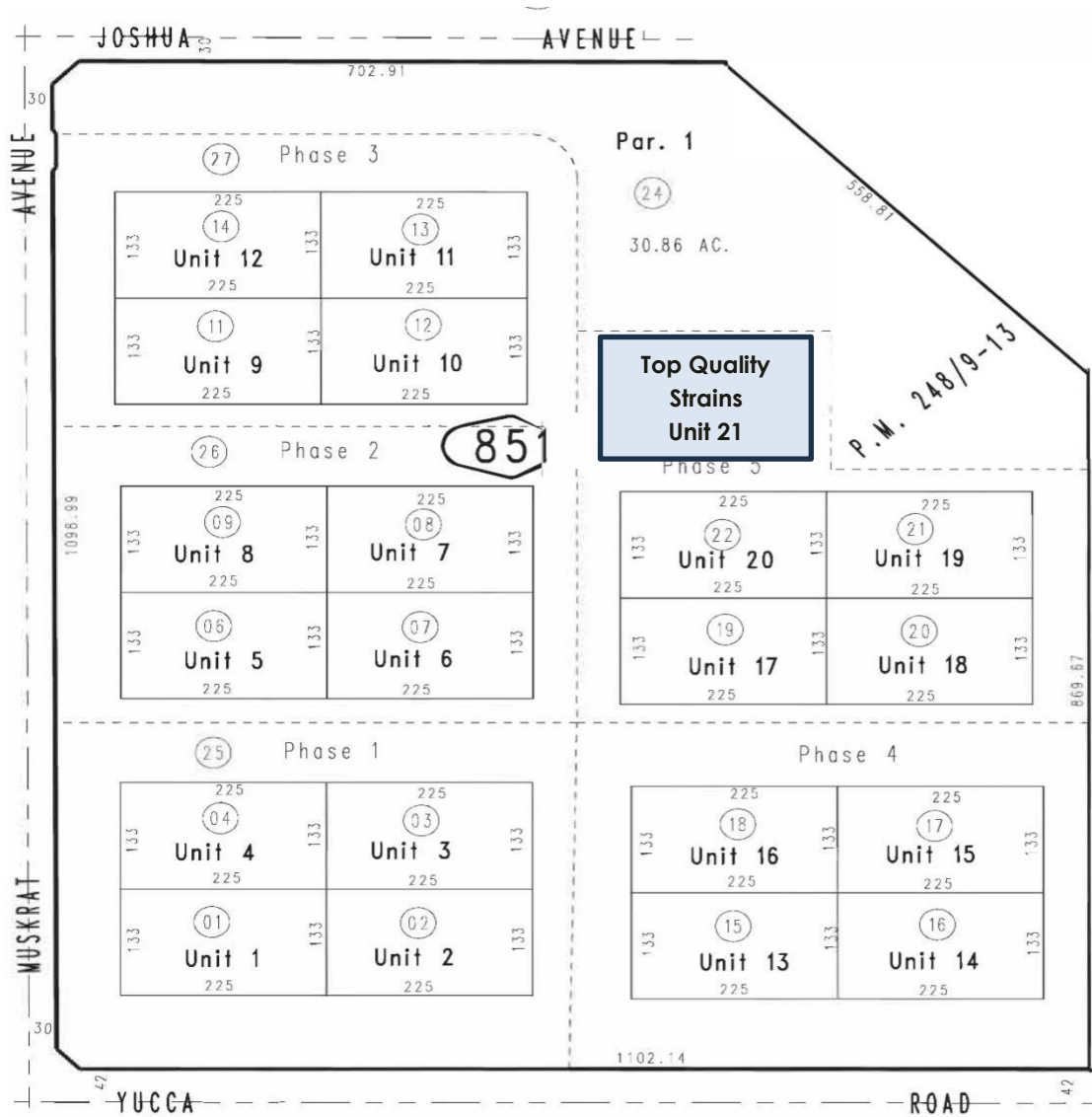


Figure 6. Premise Aerial Photograph



Figure 7. Premise Exterior Photograph



3.0 Project Description

Project Operations

The business operations are described below.

Table 2. Modified Project Operational Characteristics

Activity	Description
Cultivation-Medium Indoor. For cultivators who grow cannabis in a permanent structure using at least 25 watts of artificial light per square foot.	22,000 sf canopy
No. of Employees	9
No. of Daily Vehicle Trips	40-50
Hours of Operation	7am to 5pm M-F

Source: DCC <https://search.cannabis.ca.gov/results?searchQuery=essential%20co1>. 1/03/24

4.0 ENVIRONMENTAL IMPACT ANALYSIS

Environmental Topics Not Requiring Further Analysis

Because all ground-disturbing activities such as grading, paving, and building construction have occurred over the entire 30.97-acre site, there would be no new impacts to the environmental topics listed below because they were already addressed in the Adopted MND, and no further environmental review is necessary. (Refer to Appendix A)

- Aesthetics
- Agriculture and Forestry Resources
- Biological Resources
- Cultural Resources
- Geology and Soils
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Tribal Cultural Resources
- Wildfire

Environmental Topics Requiring Further Analysis

This Addendum evaluates the Modified Project based on the new information related to the project-specific environmental impacts of the issuance of an annual license.

- Air Quality (Odors)
- Energy (electricity and vehicle fuel)
- Greenhouse Gas Emissions
- Hazardous Materials
- Hydrology (Water Quality)
- Land Use and Planning (Zoning Regulations)
- Transportation (Vehicle Miles Traveled)
- Utilities and Service Systems (Water Supply, Wastewater, Solid Waste)
- Mandatory Findings of Significance (Cumulative Impacts)

This approach eliminates repetitive discussions of issues that have already been addressed and are no longer relevant because the industrial park has been constructed and the impacts have been ameliorated.

Air Quality

Threshold: Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Approved Project Determination

The Adopted MND evaluated air emissions from Project operations and determined that operational emissions from cannabis cultivation activities would not exceed Mojave Desert Air Quality Management District Thresholds, have any significant air quality impacts on sensitive receptors, or result in any air quality impacts above thresholds of significance. **Less Than Significant.**

Modified Project Determination

No new construction is proposed, nor is an increase in the intensity of the existing use proposed. Operational air pollutant emissions were estimated using the California Emissions Estimator Model® (CalEEMod), which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and greenhouse gas (GHG) emissions associated with both construction and operations from a variety of land use projects.

As shown in Table 3, *CalEEMod Emissions Summary Compared Against MDAQMD Thresholds*, the operational air pollutant emissions do not exceed the MDAQMD significance thresholds. As such, the conclusions are the same as those of the Adopted MND.

Table 3. CalEEMod Emissions Compared Against MDAQMD Thresholds

Operational Activities	Emissions (pounds per day)					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Total Maximum Daily Emissions	1.96	1.87	15.8	0.03	2.68	0.72
MDAQMD Regional Threshold	137	137	548	137	82	65
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

Source: Top Quality Strains, Unit 21Summary Report, Appendix B

Threshold: Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Approved Project Determination

The Adopted MND found that compliance with Adelanto Municipal Code section 17.90.110 would ensure that no odors are detectable without the aid of instruments at or beyond the lot line. **Less Than Significant Impact.**

Modified Project Determination

The activities proposed by the Applicant would occur within an enclosed building that has already been constructed. As required by the Mojave Desert Air Quality Management District (MDAQMD), once a license is approved for cultivation, extraction (including edibles) or distribution by the City and DCC, under California Business & Professions Code Division 10 (cannabis), a Cannabis Odor Compliance Form, per Rule 302(J)(5) must be filed with the MDAQMD. To this end, the Applicant received approval of Cannabis Odor Compliance Plan Permit No. COCP0000409 from the MDAQMD on June 30, 2024. **Less Than Significant Impact.**

Mandatory Findings of Significance

Threshold: Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

The geographic scope for odor impacts is the 420 Industrial Park and the adjacent development. As stated in the Adopted MND, odor impacts from the 420 Industrial Park were found to be less than significant because all cannabis activities would take place within an enclosed building. Additionally, all cannabis business operators are required to comply with Municipal Code Section 17.90.110 Odors, which states, "No operation or activity shall be permitted to emit odorous gases or other odorous matter in such quantities as to be dangerous, injurious, noxious, or otherwise objectionable and readily detectable without the aid of instruments at or beyond the lot line," and submit a Cannabis Odor Compliance Form, per Rule 302(J)(5) to the MDAQMD. These are mandatory requirements for all cannabis businesses in the City as well as the MDAQMD.

For these reasons, odor emissions are not identified as a significant cumulative impact, and because the Modified Project must comply with the same regulations imposed by other cannabis businesses, it would not make a cumulatively considerable incremental contribution to a significant cumulative impact.

Energy

Threshold: Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?

Threshold. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Approved Project Determination

The CEQA Guidelines were amended in 2018 to expand the analysis related to energy efficiency. This change became effective after the approval of the Adopted MND. Although not discussed as a separate impact analysis, energy use was considered in the air quality and greenhouse gas impact analysis in the Adopted MND, which found impacts were less than significant. Additionally, the 420 Industrial Park was constructed per the *California Green Building Standards Code* (CCR Title 24, Part 11) and the *Building Energy Efficiency Standards* (CCR Title 24, Part 6) in effect in 2017-2018. **Less Than Significant Impact.**

Modified Project Determination

The following analysis considers the Modified Project's anticipated energy use during operations to determine if the Modified Project would:

- *Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation or*
- *Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.*

Electricity Consumption

The primary source of energy used for cannabis cultivation activities is electricity for grow lights, supplemental lighting, HVAC systems, dehumidifiers, fans, security cameras, and electrical pumps. Southern California Edison (SCE) would supply electricity. Based on the electricity bills submitted as part of the Applicant's application to DCC, the Project consumed **8,335,403 kWh/year** in 2023.

As noted above, the premises are part of the 420 Industrial Park, which was constructed per the *California Green Building Standards Code* (CCR Title 24, Part 11) and the *Building Energy Efficiency Standards* (CCR Title 24, Part 6) in effect in 2017-2018. As such, the use of energy-

efficient heating and cooling systems, water-conserving plumbing, and water-efficient irrigation systems is employed during operations. **Less Than Significant Impact.**

Fuel Consumption

The fuel consumed by Project-generated traffic is a function of total vehicle miles Traveled (VMT) and estimated fuel economies of vehicles accessing the Project site. The Project will result in 2,192,680 annual VMT.² and an estimated annual fuel consumption of 83,182.1 gallons of fuel.³

Under subsequent future conditions, average fuel economies of vehicles accessing the Project site can be expected to improve as older, less fuel-efficient vehicles are removed from circulation and in response to fuel economy and emissions standards imposed on newer vehicles entering the market. Enhanced fuel economies realized pursuant to federal and state regulatory actions and related transition of vehicles to alternative energy sources (e.g., electricity, natural gas, biofuels, hydrogen cells) would decrease future gasoline fuel demands per VMT. **Less Than Significant Impact.**

Mandatory Findings of Significance

Threshold: Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

This cumulative impact analysis considers the project's development in conjunction with other development projects and planned development projects within the City. All development projects throughout the region would be required to comply with all federal, state, and local regulatory measures regarding energy efficiency in effect at the time of review. With the implementation of the existing energy conservation regulations, cumulative electricity and natural gas consumption would not be cumulatively wasteful, inefficient, or unnecessary.

Fuel consumption associated with the proposed uses and cumulative development projects would be primarily attributable to transportation, especially vehicular use. However, state fuel efficiency standards and alternative fuel policies would contribute to a reduction in fuel use. As such, petroleum fuel consumption would not occur in a wasteful, inefficient, or unnecessary manner.

For these reasons, energy consumption is not identified as a significant cumulative impact,

² CalEEMod Summary Report, Appendix B.

³ EPA, 2020 Automotive Trend Report, <https://www.epa.gov/automotive-trends/explore-automotive-trends-data>, accessed November 18, 2024.

and because the Modified Project must comply with the same regulations imposed by other cannabis businesses, it would not make a cumulatively considerable incremental contribution to a significant cumulative impact. **Less Than Significant Impact.**

Greenhouse Gas Emissions

Threshold: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Threshold: Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Approved Project Determination

The Project is estimated to emit 2,817.33 MTCO₂e per year, including amortized construction-related emissions, which does not exceed the Mojave Desert Air Quality Management District threshold used by the City of Adelanto to determine if greenhouse gas emissions are significant. **Less Than Significant Impact.**

Modified Project Determination

The Adopted MND did not discuss in detail how the amount of electricity used for cannabis cultivation would impact the quantity of GHG emissions. Electricity generation by utility companies is a significant contributor to greenhouse gas emissions. Southern California Edison (SCE) provides electricity to the Project. Beginning January 1, 2023, DCC cultivation and microbusiness licensees authorized to engage in indoor, tier 2 mixed-light cultivation, or nursery using indoor or tier 2 mixed-light techniques are required to report total electricity for each power source used to the DCC upon license renewal and comply with the renewable energy requirements.

Electricity Sources

The primary demand for electricity for cannabis cultivation activities is from grow lights, HVAC systems, dehumidifiers, fans, security cameras, and electrical pumps. Power sources that are typically used to supply power to these commercial cannabis cultivation operations may include:

- Utility providers
- Zero net energy renewable sources (such as solar and wind)
- All other electricity sources (such as generators and fuel cells)

SCE provides the Modified Project with 100% electricity from the “grid.” Zero net energy renewable sources (such as solar and wind) or other electricity sources (such as generators and fuel cells) are not used.

Under CEQA, the amount of electricity used by the Facility would be significant if it would:

1. *Result in the need for new or expanded transmission facilities directly serving the Project or*
2. *Electricity consumption exceeds the average electricity greenhouse gas emissions intensity required by Southern California Edison (SCE) under the California Renewables Portfolio Standard Program, division 1, part 1, chapter 2.3, article 16 (commencing with section 399.11) of the Public Utilities Code.*

Each of these criterion is discussed below:

Criterion 1. Require new or expanded transmission facilities.

A 2,500-amp panel services the premises. The Applicant is not increasing the number of activities above existing operations. As such, no new or expanded electrical transmission facilities are needed to continue serving the premises.

Criterion 2. Exceeds the average electricity greenhouse gas emissions intensity required by Southern California Edison (SCE) under the California Renewables Portfolio Standard Program.

Renewable Energy Requirements

Beginning January 1, 2023, DCC cultivation and microbusiness licensees authorized to engage in indoor, tier 2 mixed-light cultivation, or nursery using indoor or tier 2 mixed-light techniques are required to report total electricity for each power source used to the DCC upon license renewal and comply with the renewable energy requirements. Specifically, such licensees must have an average weighted greenhouse gas emission intensity (AWGGEI) that is less than or equal to the AWGGEI of their local utility provider. Such licensees are required to obtain carbon offset credits if the AWGGEI is greater than their utility provider's.

DCC requires compliance with this requirement as part of the licensing process. To this end, DCC has prepared the following document: *Guidance, Electricity Usage Reporting for Licensees, Revised February 17, 2023*. According to the DCC, a Licensee may complete the *Electricity Reporting Worksheet* to report electricity usage and demonstrate compliance.

According to the Guidance Document, if electricity is being supplied from the grid, the monthly kilowatt-hours (kWh) reported in each utility bill issued by the utility provider for the

previous annual licensed period is sufficient to calculate the average weighted greenhouse gas emission intensity (AWGGEI) using the *Electricity Reporting Worksheet*.

An Electricity Reporting Worksheet was prepared for the Project to demonstrate that the electricity used by premises in 2023 is less than or equal to the 0.55 average weighted greenhouse gas emission intensity (AWGGEI) for Southern California Edison (SCE) as identified in SCE's 2022 Power Content Label.

The results of the Electricity Reporting Worksheet demonstrate that the **8,335,403-kWh** consumed by the premises is below the **0.55 AWGGEI** for Southern California Edison (SCE) as identified in SCE's 2022 Power Content Label.⁴ The *Electricity Reporting Worksheet* is attached as **Appendix C** to this Addendum. **Less Than Significant Impact.**

Mandatory Findings of Significance

Threshold: Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

According to CAPCOA⁵, "GHG impacts are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective."⁶ As stated above, if a cannabis business electricity consumption is less than or equal to the 0.55 average weighted greenhouse gas emission intensity (AWGGEI) for SCE as identified in SCE's 2022 Power Content Label, then the business GHG's impacts are considered less than significant.

As noted above, the Electricity Reporting Worksheet prepared for the Modified Project demonstrates that the electricity used by premises in 2023 is less than or equal to the 0.55 average weighted greenhouse gas emission intensity (AWGGEI) for Southern California Edison (SCE) as identified in SCE's 2022 Power Content Label. All cannabis businesses in the 420 Industrial Park and in the SCE service area are required to comply with the Renewable Energy Requirements.

Additionally, the Clean Energy and Pollution Reduction Act (Senate Bill 350) established clean energy, clean air, and greenhouse gas (GHG) reduction goals, including reducing GHG to 40 percent below 1990 levels by 2030 and to 80 percent below 1990 levels by 2050. SB 350 requires large utilities (i.e., SCE) to develop and submit integrated resource plans (IRPs). These plans detail how utilities will meet their customers' resource needs, reduce GHG emissions,

⁴ https://www.sce.com/sites/default/files/custom-files/PDF_Files/SCE_2022_Power_Content_Label_B%26W.pdf

⁵ California Air Pollution Control Officers Association, <https://capcoa.org/>

⁶ California Air Pollution Control Officers Association, CEQA & Climate change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, (2008).

and ramp up the use of clean energy resources. SCE adopted the 2022 *Integrated Resource Plan* and filed it with the Public Utilities Commission on October 16, 2023. The IPR will indirectly affect the Modified Project because future electricity delivered to the premises by SCE will be provided using cleaner energy.

For these reasons, GHG emissions are not identified as a significant cumulative impact, and because the Modified Project must comply with the same regulations imposed on other cannabis businesses, it would not make a cumulatively considerable incremental contribution to a significant cumulative impact.

Hazards and Hazardous Materials

Threshold: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous material?

Threshold: Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Approved Project Determination

Any businesses that handle hazardous materials (including hazardous waste) or extremely hazardous substances are required to submit a Consolidated Emergency Response/Contingency Plan to the California Environmental Reporting System (CERS) if using, handling, or storing hazardous materials in quantities equal to or greater than:

- 55 gallons of a liquid,
- 500 pounds of a solid, or
- 200 cubic feet of compressed gas, or
- Extremely hazardous substances above the threshold planning quantity identified above.

The Adopted MND found that the use of hazardous materials within the 420 Industrial Park would be regulated by the Certified Unified Program Agency (CUPA) through a Hazardous Materials Release Response Plan and Inventory (Business Plan). Compliance with the CUPA requirements would reduce potential impacts to less than significant. **Less Than Significant Impact.**

Modified Project Determination

Various hazardous materials typically used in cannabis cultivation are stored or used on the premises. The Project Applicant indicated that between 225-285 pounds of solids and

between 27-31 gallons of liquids are stored or used on the premises at any one time.⁷ which do not exceed the reporting quantities listed above. **Less Than Significant Impact.**

Cannabis Solid Waste Disposal

Cannabis Waste Solutions manages cannabis waste for the premises. Cannabis waste is deposited into secure receptacles that are processed and removed at various intervals during a month. This process is documented through the California cannabis waste manifest system managed by the California Department of Toxic Substances Control (DTSC).⁸ **Less Than Significant Impact.**

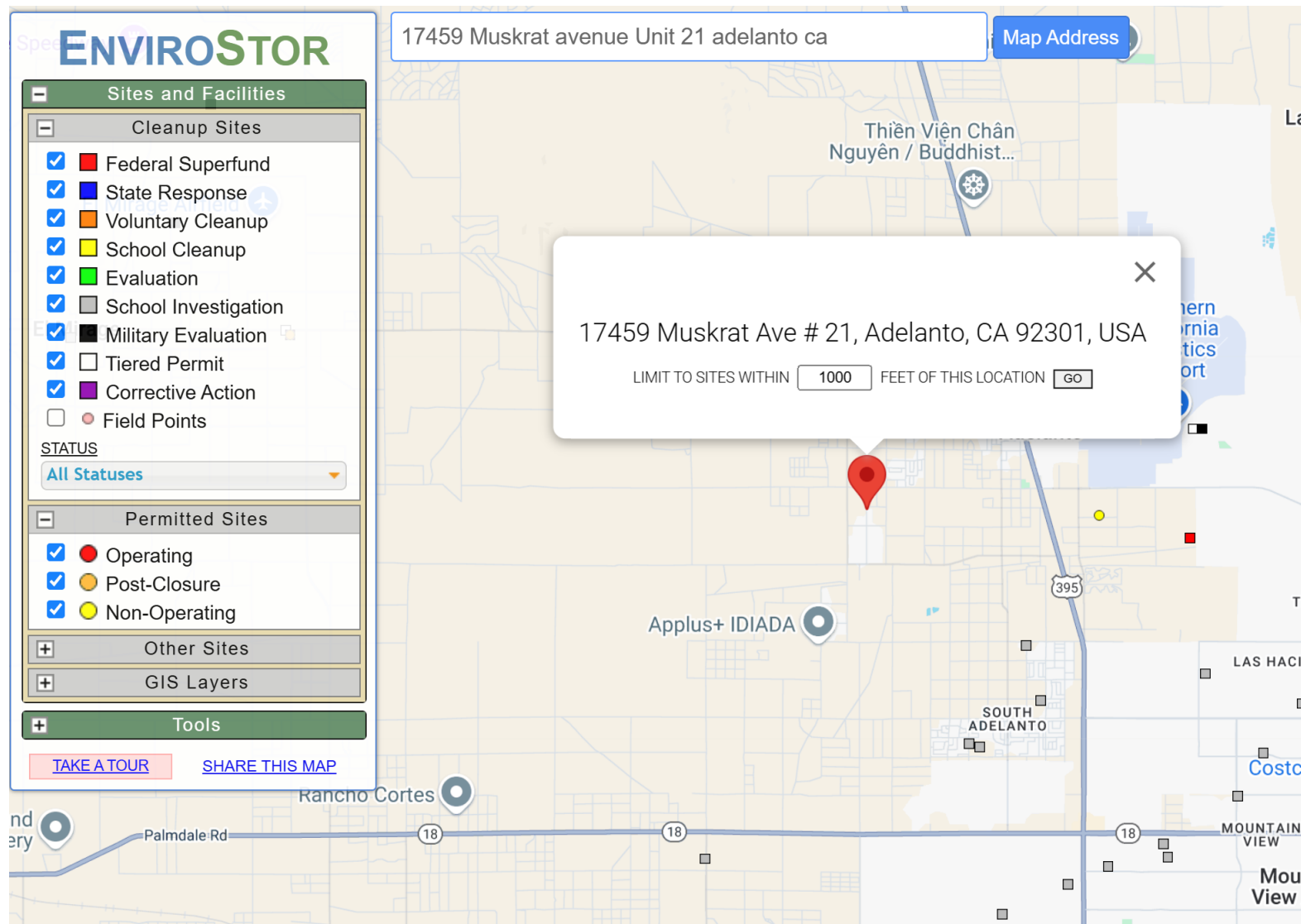
Results of EnviroStor Database Screening

Per DCC Regulation §15002, *Annual License Application Requirements*, evidence that the commercial cannabis business has conducted a hazardous materials record search of the EnviroStor Database for the proposed premises has been done. If hazardous sites were encountered, the Applicant shall provide documentation of protocols implemented to protect employee health and safety. As shown in Figure 8, *Search Results of Envirostor Database*. below, a hazardous materials record search of the EnviroStor Database was conducted on October 19, 2024, and found that the premises are not listed. **Less Than Significant Impact.**

⁷ From a site inspection by Cody Price with Ken Yamamoto. Site Manager.

⁸ DTSC webpage, <https://dtsc.ca.gov/hazardous-waste-manifest-information/>. Accessed July 26, 2024.

Figure 8. Search Results of EnviroStor Database



Source: <https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=17455+muskrat+avenue+adelanto+ca>. Accessed October 19, 2024.

Mandatory Findings of Significance

Threshold: Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

The geographic scope for the use of hazardous materials is the 420 Industrial Park because any releases of these materials would be confined to each condo unit. As noted above, any cannabis business using hazardous materials in excess of the regulatory thresholds would require the preparation of a Consolidated Emergency Response/Contingency Plan.

Additionally, all cannabis businesses are required to dispose of hazardous wastes in compliance with DCC Regulation §17223. Waste Management. This section requires that a licensee shall dispose of all waste in accordance with the Public Resources Code and any other applicable state and local laws. It is the responsibility of the licensee to properly evaluate waste to determine if it should be designated and handled as hazardous waste, as defined in Public Resources Code section 40141. Additionally, the licensee shall establish and implement a written cannabis waste management plan that describes the method or methods by which the licensee will dispose of cannabis waste, as applicable to the licensee's activities. All cannabis businesses in the 420 Industrial Park are subject to this mandatory requirement.

For these reasons, impacts related to the use of hazardous materials are not identified as a significant cumulative impact, and because the Modified Project must comply with the same regulations imposed on other cannabis businesses, it would not make a cumulatively considerable incremental contribution to a significant cumulative impact.

Hydrology and Water Quality

Threshold: Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Approved Project Determination

The Adopted MND found that the Approved Project is operating pursuant to the adopted Water Quality Management Plan which relies upon the on-site stormwater quality basin(s) which are designed to be dual-purpose retention and water quality basins relying on infiltration. Ongoing compliance with the WQMP will ensure that the Project will result in no significant impacts to hydrology or water quality. **Less than Significant Impact.**

Modified Project Determination

Cultivation activities occur within a structure with a permanent roof, a permanent relatively impermeable floor (e.g., concrete or asphalt paved), and cultivation Licensees either discharge all industrial wastewater generated to the Adelanto Wastewater Treatment Facility (a permitted wastewater treatment collection system and facility that accepts cannabis cultivation wastewater). The Modified Project received verification that it is conditionally exempt under the Conditional Waiver for indoor cultivation (**WDID No.6V36CC406408**) from the Lahontan Regional Water Quality Control Board. **Less Than Significant Impact.**

Threshold: Substantially decrease groundwater supplies or interfere with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Approved Project Impact

The Modified Project site is served with potable water by the Adelanto Public Utility Authority. The City obtains all of its water supply from local groundwater in the Mojave River Groundwater Basin. The Mojave Basin Area was the subject of a court-ordered adjudication in 1993 due to the rapid growth within the area, increased withdrawals, and lowered groundwater levels. The court's Judgment appointed Mojave Water Agency (MWA) as Watermaster of the Mojave Basin Area. Given the City's total reliance on groundwater, the reliability of the City's water supply is thus entirely dependent on the reliability of the groundwater in the Mojave River Basin managed by MWA. Based on MWA's analysis, MWA has adequate supplies to meet demands during average, single-dry, and multiple-dry years throughout the 25-year planning period. Thus, the Project's demand for domestic water service would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. As such, no new significant adverse impacts have been identified or anticipated, and no new mitigation measures have been required as a result of the Approved Project. **Less Than Significant Impact.**

Modified Project Impact

The circumstances under which the Modified Project operates are the same as described above. Thus, the Modified Project's demand for domestic water service would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge, resulting in a net deficit in aquifer volume or a lowering of the local groundwater table level. **Less than Significant Impact.**

Mandatory Findings of Significance

Threshold: Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

The geographic scope for groundwater supplies is the Mojave Basin, under the jurisdiction of the Mojave Water Agency. As noted above, the amount of groundwater pumped is controlled by the Mojave Water Agency. All water used by cannabis operations is subject to the court-ordered adjudication implemented by the MWA. This ensures that the groundwater supplies are not decreased to the extent that an overdraft of the groundwater table would occur. **Less Than Significant Impact.**

The geographic scope for water quality impacts is the jurisdiction of the California Regional Water Quality Control Board, Lahontan Region (Regional Board) which extends from the Oregon border to the northern Mojave Desert and includes all of California east of the Sierra Nevada crest. As noted above, the Modified Project received verification that it is conditionally exempt under the Conditional Waiver for indoor cultivation (**WDID No.6V36CC437360**) from the Lahontan Regional Water Quality Control Board. All cannabis businesses in the 420 Industrial Park are subject to this mandatory requirement.

For these reasons, impacts related to the sustainability of the Mojave Basin and water quality are not identified as a significant cumulative impact, and because the Modified Project must comply with the same regulations imposed on other cannabis businesses, it would not make a cumulatively considerable incremental contribution to a significant cumulative impact. **Less Than Significant Impact.**

Land Use and Planning

Threshold: Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted to avoid or mitigate an environmental effect?

Approved Project Determination

Sections 17.80.080 and 17.80.090 of the Adelanto Municipal Code regulate medical cannabis activities. These sections of the Municipal Code are intended to regulate medical cannabis activities in a manner consistent with State law. These sections currently allow medical cannabis activities as a conditionally permitted use within the Light Manufacturing (LM)

zoning district.

As disclosed in the Mitigated Negative Declaration for the Approved Project, implementation of the Project would develop the subject property with buildings used to cultivate, manufacture, distribute, transport, and test medical cannabis. In all instances where significant impacts have been identified, mitigation is provided to reduce each impact to less-than-significant levels. In addition, as demonstrated throughout this Addendum, the Proposed Project would otherwise not conflict with any applicable goals, objectives, and policies of the General Plan or municipal Code or conflict with any relevant policy document whose purpose is to avoid or mitigate an environmental effect. As such, no new significant adverse impacts have been identified or anticipated, and no new mitigation measures have been required as a result of the Proposed Project. **Less Than Significant Impact.**

Modified Project Determination

Project-specific operational information was not available when the Adopted MND was approved in 2018. Table 3, *Modified Project Consistency with Adelanto Municipal Code*, evaluates the new project-specific information that is now available for consistency with the Adelanto Municipal Code.

Table 3. Modified Project Consistency with Adelanto Municipal Code

Code Requirement	Consistency Analysis
Section 18.80.080 (d) (1) Indoor Medical Cannabis Cultivation Standards. Indoor adult-use and medical cannabis cultivation within the City, shall be in conformance with the following standards:	
A. Indoor adult-use and medical cannabis cultivation shall only be allowed upon application and approval of a Cultivation Permit and a CUP in accordance with the criteria and process set forth in this Section and this Code.	Consistent. The city approved Conditional Use Permit (CUP) 16-37 and Location and Development Plan (LDP) 16-23. Minor Conditional Use Permit No. 24-07 for an annual license is under review.
B. Indoor adult-use and medical cannabis cultivation is a conditionally permitted use only on properties within the City's Cannabis Overlay Zones.	Consistent. The Project site is located within the LM Light Manufacturing Zone.
C. No cannabis cultivation shall be established, developed, or operated within 600 feet of a school, public playground or park, childcare or day care facility, youth center, or church. All distances shall be measured in a straight line, without regard to intervening structures, from the nearest point of the building or structure in which the indoor adult-use and/or medical cannabis cultivation is, or will be located, to the nearest property line of those uses described in this Subsection.	Consistent. The Project site is located within an industrial park zoned for Light Manufacturing uses. It is adjacent to industrial development to the south and west and vacant undeveloped land to the north and east. No schools, public playgrounds or parks, childcare or daycare facilities, youth centers, or churches are within 600 feet. See Figure 6, Aerial View of the Premises.

Code Requirement	Consistency Analysis
D. An indoor adult-use and/or medical cannabis cultivation facility may not be located within the same unit as a cannabis testing facility.	Consistent. The Applicant is not operating a testing facility, and no license has been issued for one.
F. Indoor adult-use and medical cannabis cultivation is allowed only within a fully enclosed and secure structure that is inaccessible to minors.	Consistent. The business operates in a secure, enclosed building. See Figure 7, Exterior Photo of the Premises.
G. Indoor adult-use and medical cannabis cultivation shall not exceed the square footage authorized pursuant to the CUP.	Consistent. The canopy area is square feet, which does not exceed the maximum of 22,000 square feet allowed by the Cultivation-Medium Indoor license.
H. From any public right-of-way, there shall be no visible exterior evidence of any indoor adult-use or medical cannabis cultivation activity.	Consistent. The business operates in a secure, enclosed building. See Figure 2.5, Unit 21- Exterior Photo.
J. Indoor adult-use or medical cannabis cultivation shall not adversely affect the health or safety of the nearby residents by creating dust, glare, heat, noise, smoke, traffic, vibration, or other impacts and shall not be hazardous due to use or storage of materials, processes, products, or wastes.	Consistent. The nearest residential use is located approximately 1,800 feet northeast at the intersection of Air Expressway and Raccoon Avenue. As demonstrated throughout this Addendum document, indoor cannabis cultivation activities do not impact the health or safety of these residents.
K. Each indoor adult-use and/or medical cannabis cultivation facility shall fully comply with all of the applicable restrictions and mandates set forth in State law. An indoor adult- use and/or medical cannabis cultivation facility shall comply with all size requirements for such facility as imposed by State law.	Consistent. The Project operates under DCC-approved License No.CCL21-00005064-Cultivation-Medium Indoor and complies with applicable restrictions and mandates set forth in State law. The maximum canopy area for an Adult Indoor Medium Cultivation is 22,000 square feet, and the Project does not exceed this area.

Mandatory Findings of Significance

Threshold: Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

The geographic scope for land use and planning impacts are the Light Manufacturing (LM), Light Manufacturing Cannabis Only (LMCO), Manufacturing Industrial (MI), and Airport Development District (ADD) zoning districts.

As noted above, Sections 17.80.080 and 17.80.090 of the Adelanto Municipal Code regulate medical cannabis activities. All cannabis businesses within the City would also be required to undergo project-specific reviews to ensure compliance with adopted land use plans, policies, or regulations. Thus, it is expected that future projects will be consistent with the applicable General Plan and Zoning Ordinance development regulations analyzed above,

and the impacts will be less than cumulatively considerable.

For this reason, and because the Modified Project must comply with the same regulations imposed on other cannabis businesses, it would not make a cumulatively considerable incremental contribution to a significant cumulative impact. **Less Than Significant Impact.**

Transportation

Threshold: Would the project conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?

Approved Project Determination

Changes to California Environmental Quality Act (CEQA) Guidelines were adopted in December 2018. These guidelines require all lead agencies to adopt Vehicle Miles Traveled (VMT) as a replacement for automobile delay-based level of service (LOS) as the new measure for identifying transportation impacts for land use projects. This statewide mandate took effect July 1, 2020. **CEQA Guidelines §15064.3 is Not Applicable.**

Modified Project Determination

On April 27, 2022, Resolution 2041-A-Amended was adopted which set forth carbon dioxide equivalent thresholds of significance for purposes of analyzing transportation impacts under CEQA. Based on Resolution 20-41-A- Amended, the following are anticipated to generate GHG emissions of less than 3,000 metric tons of CO₂e and would result in less than significant VMT impacts and are screened out of further analyses and presumed to be less than significant:

1. Single Family – 117 Dwelling Units
2. Multi-Family Low Rise (Up to 2 levels) – 150 Dwelling Units
3. Multi-Family Mid Rise (between three and ten levels) – 222 Dwelling Units
4. General Office Building – 342,000 square feet
5. Retail – 135,000 square feet
6. High Cube Short-Term Transload Warehouse – 413,000 square feet
7. Warehousing (Unrefrigerated) – 306,000 square feet
8. Industrial– 256,000 square feet.
9. Project GHG emissions of less than 3,000 Metric Tons of Carbon Dioxide Equivalent (CO₂e) as determined by a methodology acceptable to the City. Use of project-specific trip lengths from SBTAM and resulting GHG data from CalEEMod runs are

acceptable or

10. Unless specified above, project trip generation is less than 110 trips per day per the ITE Manual or other acceptable source determined by the City.

The Modified Project meets Criterion 8 and 9. Therefore, the Modified Project does not have a significant impact on both “project generated VMT” and “project’s effect” on VMT. **Less Than Significant Impact.**

Mandatory Findings of Significance

Threshold: Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

The geographic scope for the VMT analysis is the City of Adelanto. According to the City’s VMT Guidelines, if a project is consistent with the regional RTP/SCS, (SCAG Regional Transportation Plan/ Sustainable Communities Strategy). SCAG’s RTP/SCS policies focus largely on regional transportation and the efficiency of transportation, which are implemented by counties and cities within the SCAG region as part of the overall planning and maintenance of the regional transportation system. The policies are not directly applicable to the Modified Project. However, the Modified Project does not impede the implementation of the RTP/SCS policies or programs.

For this reason, and because the Modified Project would not make a cumulatively considerable incremental contribution to a significant cumulative impact. **Less Than Significant Impact.**

Utilities and Service Systems

Threshold: Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Approved Project Determination

The Adopted MND found that based on information obtained from the City of Adelanto Engineering Department on behalf of the Adelanto Public Utility Authority, the Project is preliminarily estimated to have a water allowance of one hundred (100) gallons a day for every 1,000 square feet of building area. Utilizing that water allowance factor, each 30,000-square-foot building would have a water use allowance of up to 3,000 gallons daily. To ensure the minimum amount of water is available, the following mitigation measure was adopted:

Mitigation Measure MM- UTL1- Water Will Serve Letter: Prior to the issuance of an occupancy permit for any building, a Will Serve letter from the Adelanto Public Utility Authority shall be provided to the Planning Department confirming that a minimum of 3,000 gallons of water per day per 30,000 square feet of building are available to serve the Project.

Modified Project Determination

The sole source of water in the City is from groundwater in the Mojave River Groundwater Basin, commonly referred to as the Mojave Basin Area (MBA). The MBA is an adjudicated basin and pursuant to the Judgment, the Court appointed the Mojave Water Agency (MWA) as Watermaster of the MBA.

For management purposes under the Mojave Basin Judgment, MWA subdivided the Mojave River watershed and associated groundwater basins into five subareas: Alto, Baja, Centro, Este, and Oeste. The City of Adelanto lies within MWA's Alto Subarea. Adelanto and the other purveyors in the area supply water to their customers from local groundwater. MWA replenishes the groundwater supply, primarily with imported water purchased from the State Water Project (SWP).

The court ordered adjudication of the Mojave Basin Area to allocate a variable free production allowance (FPA) to each purveyor that supplies 10 AFY or more, including Adelanto. The FPA can vary from year to year depending on the Watermaster's safe yield projections for the Basin.

Historic Groundwater Production

The groundwater production for the previous 5 years (2016 to 2020) is contained in Table 4, *Historic Groundwater Production-AFY*.

Table 4. Historic Groundwater Production - AFY

Groundwater Volume Pumped Past Five Years						
Groundwater Type	Location or Basin Name	Volume Pumped (AF)				
		2016	2017	2018	2019	2020
City - Alluvial Basin	Mojave River Groundwater Basin, Alto Subarea	4,181	3,599	3,963	3,631	3,785
VWD - Alluvial Basin	Mojave River Groundwater Basin, Alto Subarea	3	724	178	852	862
Totals		4,184	4,323	4,141	4,483	4,647
Source: 2020 Urban Water Management Plan Notes: *DWR Submittal Table 6-1.						

Projected Water Supply

The projected water supply available through 2045 is shown in Table 5, *Projected Water Supply to 2045(AFY)* City will continue to use groundwater as the sole source of potable water supply combined with supplemental water through an intertie with MWA. The City's projected supply is the available FPA, which is currently 2,851 AFY, which may be adjusted annually by

the Watermaster. Transfers between MWA and the City are also from groundwater; future year projections are determined based on the difference between available FPA and forecasted demand, although more would be available as needed. Recycled water will begin delivery for irrigation uses by 2025, increasing through 2045.

Table 5. Projected Water Supply to 2045(AFY)

Water Supply	Additional	Projected Water Supply				
	Detail on	Reasonably Available Volume (AF)				
	Water Supply	2025	2030	2035	2040	2045
Safe Yield of Alto Subarea						
Alto Subarea	Production Safe Yield ¹	64,406	64,406	64,406	64,406	64,406
Reasonably Available Volume						
City of Adelanto	FPA of Safe Yield	2,851	2,851	2,851	2,851	2,851
Mojave Water Agency	Intertie with MWA	2,145	2,409	2,575	2,733	2,915
Recycled Water	Non-Potable	20	23	25	25	27
Totals		5,016	5,283	5,451	5,609	5,793
NOTES: *DWR Submittal Table 6-9.						
¹ MWA Watermaster Report Water Year 2019-20, May 2021, Table 5-1						

1) By providing water to the premises, new water infrastructure (e.g., water lines, storage tanks, new wells, etc.) would result in significant physical impacts on the environment or,

2) An overdraft of the groundwater basin (Alto Sub-basin) would occur, resulting in physical impacts to the environment.

Regarding Criterion 1, the premises are currently being served using the existing water infrastructure (i.e., the Water Department's groundwater well system and the water lines) used to convey water to the premises). As such, no new water infrastructure is required.

Regarding Criterion 2, the amount of water supplied to the premises in 2023 was **4,341,392 gallons or 13.32 AF** (Acre Feet.) This represents 0.26% of the projected available water supply in 2025.

The City of Adelanto *2020 Urban Water Management Plan* (UWMP) was adopted by the Adelanto Public Utilities Authority (AUPA) on August 25, 2021, which details the City of Adelanto's current and future water supply. The 2020 UWMP plan determined that there would be adequate water supply for the residential, general commercial, industrial, and open space parks and resources within the City's Public Works Water Service Area. The Project's zoning is consistent with what was included and evaluated in the 2020 UWMP.

According to the 2020 Urban Water Management Plan, the City is confident that water supplies are adequate to meet demands for all weather conditions through 2045. **Less Than Significant Impact.**

Actions to Ensure Future Water Supply

City of Adelanto Cannabis Cultivation Water Requirements

As required by Municipal Code Chapter 17.80.081, *Cannabis Cultivation Water Requirements*, each Cultivation Permittee maintains a standard curbside water meter for consumption and billing purposes ("Standard Meter") and maintains a separate water meter that exclusively measures and monitors the amount of water used for cultivation purposes ("Cultivation Meter"). Each Cultivation Permittee is required to report to the City the monthly quantity of water registered by its Cultivation Meter. This data is then provided to the MWA and the California Department of Water Resources for overall management of the Mojave River Groundwater Basin, which includes the Alto Subbasin.

Stipulated Judgment -Physical Solution

The potential overdraft of the Mojave Basin was the subject of a court-ordered adjudication in 1993 due to the rapid growth within the area, increased withdrawals, and lowered groundwater levels. The court's Judgment appointed the MWA as Watermaster of the Mojave Basin Area. The Stipulated Judgment in *City of Barstow et al. vs. City of Adelanto et al.* and related cross-complaints, which were consolidated into Case No. CIV208568 addresses water supply shortages in the Mojave Basin Area through the creation of a "Physical Solution." The Physical Solution's purpose is to control overdrafts and provide a funding mechanism to raise money to purchase imported water to offset any annual deficit. The Watermaster is responsible for monitoring flows, verifying water production, reporting to the Court, collecting assessments, and conducting studies.

Adjudication is a groundwater management system designed to balance long-term water supplies with demands. In addition to serving as the court-appointed Watermaster, MWA provides a mechanism to mitigate increased water demands above the supplies of the Subareas by importing MWA's State Water Project entitlement of 89,800 acre-feet per year. MWA fulfills its role under the Judgment by purchasing water with funds assessed by Watermaster and by importing State Water Project water under various programs. The reduction of Free Production Allowance (Rampdown) is the underpinning of the Judgment's funding mechanism. As part of the ongoing monitoring of the Mojave Basin Area, MWA has prepared the *Watermaster Annual Report for Water Year 2022-23*, May 1, 2024, which describes the measures taken to ensure that adequate water supply is available.

Water Shortage Contingency Plan

To ensure that there is not a water shortage, the Adelanto Water Department is responsible for conserving the available water supply, protecting the integrity of water supply facilities (infrastructure), and implementing a contingency plan in times of drought, supply reductions, failure of water distribution systems or emergencies. The Water Department has developed a *Water Shortage Contingency Plan* (WSC Plan) following California Water Code (CWC) Section 10632, which is part of the Urban Water Management Planning regulatory requirements.⁹ The WSC includes a Water Reliability Assessment that compares the total water supply sources available to the Water Department with long-term projected water use over the next 20 years, in five-year increments, for a normal water year, a single dry water year, and a drought lasting five consecutive water years. The WSC also includes a Drought Risk Assessment that evaluates a drought period that lasts five consecutive water years starting from the year following when the assessment is conducted.

The California Department of Water Resources (DWR) as directed by the California Water Code (CWC) §10644(c)(1)(B), prepares a Water Shortage Contingency Plan (WSCP). If the available water supply is greater than the anticipated customer demand for the upcoming year (i.e., Surplus), then the Water Department does not need to take any further action. If the expected customer demand for the forthcoming year is greater than the available water supplies, the City can initiate water conservation actions as detailed in the WSC Plan.¹⁰

Conclusions

Because the City obtains all of its water supply from the Mojave River Groundwater Basin managed by the MWA serving as Watermaster per the Stipulated Judgement referenced above, it relies upon the available supply allocated by the MWA. According to the Watermaster, MWA, has indicated despite long-term changes in State Water Project supply availability to replenish the Basin, regional water supplies – groundwater and surface water – within the MWA service area boundaries are reliable during normal, single dry, and five consecutive dry years through 2065.¹¹

Mandatory Findings of Significance

Threshold: Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project

⁹

https://cms3.revize.com/revize/adelanto/Documents/Services/Water%20&%20Sewer/ADELANTO%202020%20UWMPWSCP/City%20of%20Adelanto%202021%20WSCP_1.pdf. P. 5. Accessed on May 31, 2024.

¹⁰ <https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Water-Use-And-Efficiency/Files/2023-Summary-Report.pdf>

¹¹

https://cms3.revize.com/revize/adelanto/Documents/Services/Water%20&%20Sewer/ADELANTO%202020%20UWMPWSCP/City%20of%20Adelanto%202021%20WSCP_1.pdf

are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

The geographic scope of water supply impacts is the Alto Subbasin of the Mojave River Groundwater Basin. As noted above, As part of the ongoing monitoring of the Mojave Basin Area, MWA has prepared the *Watermaster Annual Report for Water Year 2022-23*, May 1, 2024, which describes the measures taken to ensure that adequate water supply is available.

All cannabis businesses within the City would also be required to comply with Municipal Code Chapter 17.80.081, *Cannabis Cultivation Water Requirement*

For these reasons, the Modified Project would not make a cumulatively considerable incremental contribution to a significant cumulative impact. **Less Than Significant Impact.**

CEQA Determination

As demonstrated by the analysis in Section 4.0, *Environmental Impact Analysis*, the approval of Addendum 2 would not result in any new significant impacts nor substantially increase the severity of previously anticipated significant impacts. Instead, all of the effects associated with the issuance are within the envelope of impacts addressed in the Mitigated Negative Declaration (MND) for Conditional Use Permit (CUP) No. 16-37 and Location and Development Plan (LDP) No. 16-23, adopted January 17, 2017, and the Addendum to Mitigated Negative Declaration (MND) for Conditional Use Permit (CUP) No. 16-37 and Location and Development Plan (LDP) No. 16-23, adopted December 19, 2018. Based on this determination, a Minor Conditional Use Permit (MCUP 24-08) for the issuance of an annual license does not meet the requirements for preparation of a Subsequent or Supplemental MND under Section 15162 of the CEQA Guidelines, and an **ADDENDUM No. 6** is the appropriate CEQA determination.



Nyeka Allen

City of Adelanto Development Services Coordinator

Date: November 21, 2024

Appendix A

Adopted MND

Summary of Impacts Table

Adopted MND- Summary of Impacts

Environmental Topic/Threshold	Adopted MND Finding	Modified Project Impact
4.1 . Aesthetics. Would the Project:		
4.1.2a) Have a substantial adverse effect on a scenic vista?	Less Than Significant. The increase in building square footage is proposed to be accomplished by adding mezzanine or second levels within the current building envelopes. The Project's overall height, massing, geometry, and rhythm will be the same as the Approved Project	No Impact. No new buildings are proposed.
4.1.2b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.	No Impact. The Project site is not located within a state scenic highway.	No Impact. No change in circumstances has occurred.
4.1.2c) Substantially degrade the existing visual character or quality of the site and its surroundings?	Less Than Significant. The Project is currently under construction and the visual character of the site has changed from vacant desert land to an industrial development.	Less Than Significant. The Project is fully developed per the requirements of Location & Development Plan 16-23.
4.1.2d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Less Than Significant. Compliance with the City of Adelanto zoning ordinance provisions related to lighting would prevent significant impacts due to light or glare.	Less Than Significant. All lighting is installed per Adelanto Zoning Ordinance §17.90.040 Lighting.
4.2. Agriculture and Forestry Resources. Would the Project:		
4.2.2a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	No Impact. There are no areas in the City of Adelanto designated by the California Department of Conservation as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance Land within the Proposed Project Area is classified as Grazing Land, Urban and Built-up Land, and Other Land.	No Impact. The Project site is fully developed.
4.2.2b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No Impact. The Project site is designated as Light Manufacturing (LM) by the General Plan/Zoning Map which allows a variety of light industrial uses. The LM district does not allow agricultural uses as a primary use. As such, there is no impact. No mitigation measures are required.	No Impact. The Project site is fully developed.
4.2.2c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	No Impact. According to the latest Williamson Act Map for the County of San Bernardino (FY 2017/2018) there are no properties within the Proposed Project area under a Williamson Act contract.	No Impact. The Project site is not under a Williamson Act contract.

Environmental Topic/Threshold	Adopted MND Finding	Modified Project Impact
4.2.2 d) Result in the loss of forest land or conversion of forest land to non-forest use?	No Impact. The Project area and surrounding properties do not contain forest lands, are not zoned for forest lands, nor are they identified as containing forest resources by the <i>General Plan</i> .	No Impact. The Project site is fully developed.
4.2.2 e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	No Impact. Based on the analysis under the issues described above, no impact would occur with respect to changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use.	No Impact. The project site is fully developed.
4.3 Air Quality. Would the Project:		
4.3.2a) Conflict with or obstruct the implementation of the applicable air quality plan?	Less Than Significant Impact with Mitigation Incorporated. The Project would not exceed Mojave Desert Air Quality Management District significance thresholds for any criteria pollutant during construction or during long term Operation; the Proposed must comply with all applicable Mojave Desert Air Quality Management District rules, regulations, and control measures; and the Project site has a General Plan/Zoning designation of Light Manufacturing (LM). The project is not proposing the change the underlying land use designation and remains the same as used in the land use assumptions to prepare the Mojave Desert Air Quality Management Plans.	Less Than Significant. Mitigation measures were only required during construction. The Project does not involve new construction or the expansion of the existing use. The impact is less than with was determined in the Adopted MND.
4.3.2b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	Less Significant Impact With Mitigation Incorporated. The Project would not exceed Mojave Desert Air Quality Management District thresholds for construction or operational activities for any criteria pollutant.	Less Than Significant. Impact. Same response as above.
4.3.2c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	NEW INFORMATION. The Applicant's application and associated documents provide more detail than the information available when the MND was adopted in 2017.	The Applicant's application and associated documents provide more detail than the information available when the MND was adopted in 2017.
4.3.2d) Expose sensitive receptors to substantial pollutant concentrations?	NEW INFORMATION. The Applicant's application and associated documents provide more detail than the information available when the MND was adopted in 2017.	Section 3.2 <i>Analysis of New Information</i> , of this Addendum document addresses the new information.
4.3.2 e) Create objectionable odors affecting a substantial number of people?		
4.4 Biological Resources. Would the Project:		

Environmental Topic/Threshold	Adopted MND Finding	Modified Project Impact
4.2.2a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service	No Impact. The entire site has been graded and is under construction. All mitigation measures required by the MND for the Approved Project h for Biological Resources have been complied with. As such, there are no new significant adverse impacts are identified or anticipated, and no new mitigation measures are required as a result of the Proposed Project.	No Impact. The Project site is fully developed. This issue is no longer relevant.
4.2.2b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service;		
4.2.2c)Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?		
4.2.2 d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;		
4.2.2 e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or		
4.2.2 f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan		
4.5 Cultural Resources. Would the Project:		
4.5.2 a) Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines § 15064.5?	No Impact. The entire site has been graded and is under construction. All mitigation measures required by the MND for the Approved Project for Cultural Resources have been complied with. As such, there are no new significant adverse impacts are identified or anticipated, and no new mitigation measures are required as a result of the Project.	No Impact. The Project site is fully developed. These issues are no longer relevant.
4.5.2 b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines § 15064.5 or tribal cultural pursuant to Public Resources Code 21074?		

Environmental Topic/Threshold	Adopted MND Finding	Modified Project Impact
4.5.2 c) Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074?		
4.5.2 d) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		
4.5.2 e) Disturb any human remains, including those interred outside of formal cemeteries?		
New Topic: Energy. Would the Project:		
Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	NEW INFORMATION: The California Natural Resources Agency updated the California Environmental Quality Act Guidelines in 2018. This topic was not specifically addressed in the Adopted MND.	Section 3.2 <i>Analysis of New Information</i> , of this Addendum document addresses the new information.
Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?		
4.6 Geology and Soils: Would the Project:		
4.6.2 a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42; ii) Strong seismic ground shaking; iii) Seismic-related ground failure, including liquefaction; Landslides.	No Impact. The entire site has been graded and is under construction. Any impacts associated with Geology and Soils were ameliorated through the issuance of grading and building permits.	No Impact. The Project site is fully developed. This issue is no longer relevant.
4.6.2 b) Result in substantial soil erosion or the loss of topsoil?		
4.6.2 c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?		
4.6.2 d) Be located on expansive soil, as defined in Table		

Environmental Topic/Threshold	Adopted MND Finding	Modified Project Impact
18-1-B of the Uniform Building Code (1994), creating direct or indirect substantial risks to life or property?		
4.6.2 d) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?		
4.7 Greenhouse Gas Emissions. Would the Project:		
4.7.2 a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	NEW INFORMATION: The Applicant's application and associated documents provide more detail than the information available when the MND was adopted in 2018.	Section 3.2 <i>Analysis of New Information</i> , of this Addendum document addresses the new information.
4.7.2 b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?		
4.8 Hazards and Hazardous Materials. Would the Project:		
4.8.2 a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous material?	NEW INFORMATION: The Applicant's application and associated documents provide more detail than the information available when the MND was adopted in 2018.	Section 3.2 <i>Analysis of New Information</i> , of this Addendum document addresses the new information.
4.8. 2 b) b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?		
4.8.2 c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	No Impact. The Project site is not located within one-quarter (0.25) mile of a mile from an existing or proposed school.	No Impact. There is no change in circumstances.
4.8.2 d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment;	No Impact. The Project site is not included on the list of hazardous materials sites compiled in accordance with Government Code No. 65962.5.	No Impact. There is no change in circumstances.
4.8.2 e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area;	No Impact. The Project site is not located within 2 miles of a public airport or within an airport land use plan. The nearest public airport is the Southern California Logistics Airport located approximately 3.5 miles northeast of the Project site.	No Impact. There is no change in circumstances.

Environmental Topic/Threshold	Adopted MND Finding	Modified Project Impact
4.8.2 f) For a project within the vicinity of a private airstrip, would the Project result in a safety hazard for people residing or working in the Project area?	No Impact. The Project site is located approximately two (2) miles northeast of Adelanto Airport which is a privately owned general aviation facility with two unpaved runways. It is primarily used by single-engine aircraft, helicopters, ultralight aircraft, and gliders. The Project site is not within the vicinity or approach/departure flight path of the airport.	No Impact. There is no change in circumstances.
4.8.2 g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan;	Less Than Significant. Access to the Project site is from Yucca Road and Muskrat Avenue, which are improved roadways. The Project site does not contain any emergency facilities, nor does it serve as an emergency evacuation route.	Less Than Significant. There is no change in circumstances.
4.8.2 h) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	Less Than Significant. The City of Adelanto Municipal Code Chapter 14.20 adopts the 2013 Edition of the California Fire Code, making all its provisions applicable in the City of Adelanto. Implementing the applicable provisions of the Fire Code into the project design will reduce the risk of loss, injury, or death involving wildland fires to a level less than significant. .	No impact. According to the California Fire Hazard Severity Zone Viewer maintained by CAL FIRE; the Project site is not located within a high wildfire hazard area. 2 The project site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones.
4.9 Hydrology and Water Quality. Would the Project:		
4.9.2 a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	NEW INFORMATION. The Applicant's application and associated documents provide more detail than the information available when the MND was adopted in 2018.	Section 3.2 <i>Analysis of New Information</i> , of this Addendum document addresses the new information.
4.9.2 b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	NEW INFORMATION: The Applicant's application and associated documents provide more detail than the information available when the MND was adopted in 2018.	Section 3.2 <i>Analysis of New Information</i> , of this Addendum document addresses the new information.

Environmental Topic/Threshold	Adopted MND Finding	Modified Project Impact
4.9.2 c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or offsite?	Less Than Significant. The entire site has been graded and is under construction. Any impacts associated with altering the existing drainage pattern were ameliorated through the issuance of grading and building permits.	Less Than Significant Impact. The Project site is fully developed. The existing storm drain system is operational and functioning adequately.
4.9.2 d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on or offsite?	Less Than Significant. The entire site has been graded and is under construction. Any impacts associated with altering the existing drainage pattern were ameliorated through the issuance of grading and building permits.	Less Than Significant. The Project site is fully developed. The existing storm drain system is operational and functioning adequately.
4.9.2 e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	Less Than Significant. The entire site has been graded and is under construction. Any impacts associated with creating or contributing runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff were ameliorated through the issuance of grading and building permits.	Less Than Significant. The Project site is fully developed. The existing storm drain system is operational and functioning adequately.
4.9.2 f) Otherwise substantially degrade water quality?	NEW INFORMATION: The Applicant's application and associated documents provide more detail than the information available when the MND was adopted in 2018.	Section 3.2 <i>Analysis of New Information</i> , of this Addendum document addresses the new information.
4.9.2 g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	No Impact. The Proposed Project does not propose any housing.	No Impact. There is no change in circumstances.
4.9.2 h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	No Impact. The Project site is not located within a designated flood plain based upon a review of Federal Emergency Management Agency Flood Insurance Rate Map Panel No. 060671C5780H, dated August 28, 2008. This	No Impact. There is no change in circumstances.
4.9.2 j) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	No Impact. The Project site and surrounding area is not located within a designated dam inundation area.	No Impact. There is no change in circumstances.
4.9.2 k) Inundation by seiche, tsunami, or mudflow?	No Impact. The Project will not be impacted by inundation by seiche, tsunami, or mudflow, because the Project is not located in the vicinity of any body of water that has the potential of seiche or tsunami. The site is level and	No Impact. There is no change in circumstances.

Environmental Topic/Threshold	Adopted MND Finding	Modified Project Impact
	not subject to mudflows.	
4.10 Land Use and Planning. Would the Project:		
4.10.2 a) Physically divide an established community;	No Impact. The entire site has been graded and is under construction and it will not physically divide an established community.	No Impact. The Project site is fully developed.
4.10.2b) Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted to avoid or mitigate an environmental effect?	NEW INFORMATION: The Applicant's application and associated documents provide more detail than the information available when the MND was adopted in 2018.	Section 3.2 <i>Analysis of New Information</i> , of this Addendum document addresses the new information.
4.11 Mineral Resources. Would the Project:		
4.11.2 a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state; or	No Impact. The entire site has been graded and is under construction. No mineral resources were impacted.	No impact. The Project site is fully developed.
4.11.2b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?		
4.12 Noise. Would the Project:		
4.12.2a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Less Than Significant Impact. There are no sensitive receptors (i.e. residences, motels and hotels, schools, libraries, churches, hospitals, nursing homes, auditoriums, and parks and other outdoor recreation areas) that may be affected by Project's operational noise.	Less Than Significant. There is no change in circumstances.
4.12.2b) Generation of excessive ground borne vibration or ground borne noise levels; or	Less Than Significant. The only construction activities are for interior remodeling and does not involve heavy equipment. The Proposed Project does not involve any operational activity that could result in groundborne vibration.	No Impact. There is no construction, either interior or exterior proposed.
4.12.2 c) A substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project?	Less Than Significant. See response to 4.12.2 a) above.	Less Than Significant. There is no change in circumstances.
4.12.2 d) A substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project?	Less Than Significant. See response to 4.12.2 a) above.	Less Than Significant. There is no change in circumstances.
4.12.2 e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the	Less Than Significant. The Project site is located approximately two (2) miles northeast of Adelanto Airport which is a privately owned general aviation facility with two unpaved runways. It is primarily used by single-engine aircraft, helicopters, ultralight aircraft, and	Less Than Significant. There is no change in circumstances.

Environmental Topic/Threshold	Adopted MND Finding	Modified Project Impact
Project area to excessive noise levels?	gliders. The Project site is not within the vicinity or approach/departure flight path of the airport. As such, the Project will not be exposed to noise impacts from the airport. Impacts are less than significant, and no mitigation measures are required.	
4.12.2 f) For a project within the vicinity of a private airstrip, would the Project expose people residing or working in the Project area to excessive noise levels?	Less Than Significant. The Project site is located approximately 3.5 miles northwest of the Southern California Logistics Airport and is located outside of the 65 dBA CNEL noise contour. The Project site is located approximately 3.5 miles northwest of the Southern California Logistics Airport and is located outside of the 65 dBA CNEL noise contour. Therefore, the Project site will not be exposed to noise impacts from these airports.	Less Than Significant. There is no change in circumstances.
4.13 Population and Housing. Would the Project:		
4.13.2 a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure); or	No Impact. The Proposed Project would not directly result in population growth because it does not propose any residential dwelling units. The Project site does not contain any residential units.	No Impact. There is no change in circumstances.
4.13.2b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.		
4.14 Public Services. Would the Project:		
4.14.2 a) Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: - Fire protection; - Police protection; - Schools; - Parks; - Other public facilities.	Less Than Significant. The San Bernardino County Fire Department provides fire protection services to the Project area. The Project would be primarily served by Adelanto Station #322, an existing station located approximately 0.8 roadway miles southeast of the Project site at 10370 Rancho Road. The County of San Bernardino Sheriff's Department routinely patrols the Project site. The Project does not directly generate students. The Project will not create a demand for additional park facilities because the Project is an industrial development and no housing is proposed. The Project proposes industrial buildings intended to be used for medical cannabis cultivation, manufacturing, distribution, transportation, and testing. These types of uses are not labor intensive and will not create an additional need for housing thus increasing the overall population of the City. In addition, the City requires that 50% of the future employees be current residents of the City.	Less Than Significant. There is no change in circumstances.
4.15 Recreation. Would the Project:		

Environmental Topic/Threshold	Adopted MND Finding	Modified Project Impact
4.15.2 a) Would the proposed project Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Less Than Significant. The Project is an industrial development and would not directly generate the need for recreational facilities. Also refer to the response to 4.14a above.	Less Than Significant. There is no change in circumstances.
4.15.2 b) Does the project Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?		
4.16 Transportation. Would the Project:		
4.16.2a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	Less Than Significant. The Project is not proposing to construct any street improvements that will interfere with any future bus service. As such, the Project as proposed will not conflict with an applicable plan, ordinance or policy applying to transit services. The Project is not proposing to construct any improvements that will interfere with bicycle and pedestrian use. Pedestrian and bicycle access are available to the Project site on Yucca Road, Muskrat Avenue, and Joshua Avenue. In addition, bicycle parking is provided on the Project site. Therefore, the Project will not conflict with an applicable plan, ordinance or policy applying to non-motorized travel. Impacts are less than significant.	Less Than Significant. There is no change in circumstances.
4.16.2b) Conflict with an applicable congestion management program, including, but not limited to, level-of-service standards and travel demand measures or other standards established by the county congestion management agency for designated roads or highways?	Not Applicable. The California Natural Resources Agency updated the California Environmental Quality Act Guidelines in 2018. This topic was deleted as an environmental impact and is no longer relevant.	Not Applicable.
4.16.2c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in The Project site being accessible via Yucca Road, Muskrat Avenue, and Joshua Avenue, which are improved roadways constructed per City Standards. Therefore, access to alternative transportation (i.e., public transit, pedestrian, bicycle) can be accommodated, and the project will not decrease the performance of existing alternative transportation facilities or be in conflict with policies, plans, or programs supporting alternative transportation substantial safety risks.	Less Than Significant. The Project is not located within 2 miles of a public airport or within an airport land use plan. The nearest public airport is the Southern California Logistics Airport, located approximately 3.5 miles northeast of the Project site. As such, there are no impacts, and no mitigation measures are required. The Project site is located approximately two (2) miles northeast of the Adelanto Airport, which is a privately owned general aviation facility with two unpaved runways. It is primarily used by single-engine aircraft, helicopters, ultralight aircraft, and gliders. The project site is not within the vicinity or	Less Than Significant. There is no change in circumstances.

Environmental Topic/Threshold	Adopted MND Finding	Modified Project Impact
	approach/departure flight path of the airport and will not impact air traffic patterns. As such, there are no impacts, and no mitigation measures are required	
4.16.2d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less Than Significant. The Project site is accessible via Yucca Road, Muskrat Avenue, and Joshua Avenue which are improved roadways constructed per City Standards. The Proposed Project is located in an industrial area so it will not create a hazard with incompatible uses (e.g., farm equipment).	Less Than Significant. There has been no change in circumstances.
4.16.2e) Result in inadequate emergency access?		
4.16.2 f) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	Less Than Significant. The project site is accessible via Yucca Road, Muskrat Avenue, and Joshua Avenue, which are improved roads constructed per City Standards. Therefore, access to alternative transportation (i.e., public transit, pedestrian, bicycle) can be accommodated, and the project will not decrease the performance of existing alternative transportation facilities or be in conflict with policies, plans, or programs for alternative transportation.	Less Than Significant. There has been no change in circumstances.
Tribal Cultural Resources. Would the Project:		
Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code §5020.1 (k), or	Less Than Significant with Mitigation Incorporated. The entire site has been graded and is under construction. All mitigation measures required by the MND for the Approved Project for Cultural Resources have been complied with.	No Impact. The Project site is fully developed.
A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.		
4.17 Utilities and Service Systems. Would the Project:		
4.17.2a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	NEW INFORMATION: The Applicant's application and associated documents provide more detail than the information available when the MND was adopted in 2018.	Section 3.2 <i>Analysis of New Information</i> , of this Addendum document addresses the new information.

Environmental Topic/Threshold	Adopted MND Finding	Modified Project Impact
4.17.2b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Less Than Significant. The entire site has been graded and is under construction. Any impacts associated with the construction of new water or wastewater treatment facilities or expansion of existing facilities were ameliorated through the issuance of grading and building permits.	Less Than Significant. The Project site is fully developed. No new water or wastewater facilities are proposed.
4.17.2c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Less Than Significant. The entire site has been graded and is under construction. Any impacts associated with the construction of new stormwater drainage facilities or expansion of existing facilities were ameliorated through the issuance of grading and building permits.	No Impact. The Project site is fully developed.
4.17.2d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	NEW INFORMATION: The Applicant's application and associated documents provide more detail than the information available when the MND was adopted in 2018.	Section 3.2 <i>Analysis of New Information</i> , of this Addendum document addresses the new information.
4.17.2e) Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?	Less Than Significant. The Adopted MND found that the allowable capacity of the Adelanto Wastewater Treatment Facility up to 4.0 MGD would provide the City with adequate capacity to serve the Project's wastewater needs and would not significantly impact existing commitments. Additionally, the Adelanto Public Utilities Authority must operate all its treatment facilities per the waste treatment and discharge standards and requirements set forth by the Lahontan Regional Water Quality Control Board. The proposed Project would connect to the City's sewer system. It thus would have no potential to exceed the applicable wastewater treatment requirements established by the Lahontan Regional Water Quality Control Board.	Less Than Significant. There is no expansion of the existing use proposed. The premises will remain connected to the City's sewer system.
4.17.2 f) Be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs?	Less Than Significant. According to the Cal Recycle Facility/Site Summary Details website accessed on November 21, 2018, the Victorville Landfill has a permitted disposal capacity of 3,000 tons per day with a remaining capacity of 81,510,000 cubic yards. The Victorville Landfill is estimated to reach capacity, at the earliest time, in 2047.	Less Than Significant. There is no expansion of the existing use proposed. There has been no change in circumstances.

Environmental Topic/Threshold	Adopted MND Finding	Modified Project Impact
Comply with federal, state, and local statutes and regulations related to solid waste?	Less Than Significant. Cannabis waste is deposited into secure receptacles that are processed and removed at various intervals during a month. This process is documented through the California cannabis waste manifest system managed by the California Department of Toxic Substances Control (DTSC).	Less Than Significant. Cannabis Waste Solutions manages cannabis waste for the premises in compliance with local, state, and federal law.
Wildfire. Would the Project:		
Substantially impair an adopted emergency response plan or emergency evacuation plan?	Less Than Significant. See Response to Issue .4.8.2 h) under Section 4.8, <i>Hazards and Hazardous Materials</i> .	No Impact. According to the California Fire Hazard Severity Zone Viewer maintained by CAL FIRE; the Project site is not located within a high wildfire hazard area. 2 The project site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones.
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?		
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?		
Mandatory Findings of Significance. Would the Project:		
Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	NEW INFORMATION: The Applicant's application and associated documents provide more detail than the information available when the MND was adopted in 2018	Section 3.2 <i>Analysis of New Information</i> , of this Addendum document addresses the new information.
Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)		

Environmental Topic/Threshold	Adopted MND Finding	Modified Project Impact
Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		

Appendix B



CalEEMod
California Emissions Estimator Model

Top Quality Strains, Inc.
17459 Muskrat Avenue, Unit 21
Adelanto, CA 92310

Top Quality Strains Summary Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Essential Co.
Operational Year	2024
Lead Agency	City of Adelanto
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	4.80
Precipitation (days)	1.40
Location	34.565740934707506, -117.44843193562652
County	San Bernardino-Mojave Desert
City	Adelanto
Air District	Mojave Desert AQMD
Air Basin	Mojave Desert
TAZ	5104
EDFZ	10
Electric Utility	Southern California Edison
Gas Utility	Southwest Gas Corp.
App Version	2022.1.1.28

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
General Light Industry	29.9	1000sqft	0.69	29,925	0.00	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Waste	S-1/S-2	Implement Waste Reduction Plan

2. Emissions Summary

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.12	1.96	1.87	15.8	0.03	0.05	2.62	2.68	0.05	0.66	0.72	33.3	4,161	4,194	3.52	0.17	20.9	4,352
Mit.	2.12	1.96	1.87	15.8	0.03	0.05	2.62	2.68	0.05	0.66	0.72	23.3	4,161	4,184	2.52	0.17	20.9	4,317
% Reduced	—	—	—	—	—	—	—	—	—	—	—	30%	—	< 0.5%	28%	—	—	1%
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.77	1.64	1.99	10.8	0.03	0.05	2.62	2.67	0.05	0.66	0.71	33.3	3,863	3,896	3.52	0.17	8.13	4,043
Mit.	1.77	1.64	1.99	10.8	0.03	0.05	2.62	2.67	0.05	0.66	0.71	23.3	3,863	3,886	2.52	0.17	8.13	4,008
% Reduced	—	—	—	—	—	—	—	—	—	—	—	30%	—	< 0.5%	28%	—	—	1%
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.80	1.66	1.89	11.3	0.03	0.05	2.38	2.43	0.05	0.60	0.65	33.3	3,653	3,686	3.51	0.16	12.9	3,835
Mit.	1.80	1.66	1.89	11.3	0.03	0.05	2.38	2.43	0.05	0.60	0.65	23.3	3,653	3,676	2.51	0.16	12.9	3,800
% Reduced	—	—	—	—	—	—	—	—	—	—	—	30%	—	< 0.5%	28%	—	—	1%

Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.33	0.30	0.34	2.07	0.01	0.01	0.43	0.44	0.01	0.11	0.12	5.51	605	610	0.58	0.03	2.14	635
Mit.	0.33	0.30	0.34	2.07	0.01	0.01	0.43	0.44	0.01	0.11	0.12	3.85	605	609	0.42	0.03	2.14	629
% Reduced	—	—	—	—	—	—	—	—	—	—	—	30%	—	< 0.5%	28%	—	—	1%

6. Climate Risk Detailed Report

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	3	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	0	0	0	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	3	1	1	3
Extreme Precipitation	N/A	N/A	N/A	N/A

Essential

Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	1	1	1	2
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

7. Health and Equity Details

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	89.0
Healthy Places Index Score for Project Location (b)	1.00
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	Yes
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

Appendix C

Top Quality Strains Inc. Electricity Reporting Worksheet

Electricity Reporting Worksheet

Pursuant to California Code of Regulations, title 4, section 15020(f), upon license renewal, complete the following for each power source used for commercial cannabis cultivation for all cultivation activities for the previous annual licensed period. For guidance on completing this worksheet and instructions for submitting the information, reference Electricity Usage Reporting Guide for License Renewals.

Electricity from Utility Provider

☐ Utility provider not used

☒ Utility provider used

Line 1. Name of utility provider

Southern California Edison

Select One:

Electricity from grid only

Complete lines 1a through 1d:

Line 1a. Total Electricity Supplied:

8,335,403

kWh

Line 1b. Number of Licenses covered in bill:

1

Line 1c. Total electricity supplies to each license:

8,335,403

KWh

Line 1d. Utility's GHG emission intensity:

0.55

lbs CO₂e/kWh

Electricity from Zero Net Energy Sources

☒ Other electricity sources not used

☐ Other electricity sources used

Line 2. Total electricity supplied by a zero net energy renewable source not part of a net metering or other utility benefit:

kWh

Electricity from Other Sources

Source Type:

Generator rated:

Less than 50 hp

Generator Make:

Generator Model:

Engine Model:

Horsepower

Direct Measurement of Electricity Use

Total electricity calculated from:

Direct Measurement of Electricity Use:

Line 3a. Enter total energy used from meter reading (round to nearest whole digit)

kWh

Select fuel type:

Natural Gas

Line 3b. GHG emission intensity of fuel source:

0.02 lb CO₂e/gal

Enter Brake-Specific Fuel Consumption (taken from generator Specification sheets on manufacturer's website):

lb/bph-hr

Enter Fuel Density (taken from generator specification sheets on manufacturer's website):

lb/gal

Line 3c. GHG emission intensity for license:

0.000 lb CO₂e/kWh

Average Weighted Greenhouse Gas Emission Intensity

Line 4: Average Weighted Greenhouse Gas Emission Intensity

0.55

SCE 2022 Power Content Label

2022 POWER CONTENT LABEL								
Southern California Edison								
www.sce.com								
Greenhouse Gas Emissions Intensity (lbs CO ₂ e/MWh)				Energy Resources	SCE Power Mix	SCE Green Rate 50% Option	SCE Green Rate 100% Option	2022 CA Power Mix
SCE Power Mix	SCE Green Rate 50% Option	SCE Green Rate 100% Option	2022 CA Utility Average	Eligible Renewable ¹	33.2%	66.7%	100.0%	35.8%
552	275	0	422	Biomass & Biowaste	0.1%	0.0%	0.0%	2.1%
■ SCE Power Mix ■ SCE Green Rate 50% Option ■ SCE Green Rate 100% Option ■ 2022 CA Utility Average				Geothermal	5.7%	2.9%	0.0%	4.7%
				Eligible Hydroelectric	0.5%	0.3%	0.0%	1.1%
				Solar	17.0%	58.6%	100.0%	17.0%
				Wind	9.8%	4.9%	0.0%	10.8%
				Coal	0.0%	0.0%	0.0%	2.1%
				Large Hydroelectric	3.4%	1.7%	0.0%	9.2%
				Natural Gas	24.7%	12.3%	0.0%	36.4%
				Nuclear	8.3%	4.2%	0.0%	9.2%
				Other	0.1%	0.0%	0.0%	0.1%
				Unspecified Power ²	30.3%	15.1%	0.0%	7.1%
				TOTAL	100.0%	100.0%	100.0%	100.0%
Percentage of Retail Sales Covered by Retired Unbundled RECs ³ :					3%	1%	0%	
¹ The eligible renewable percentage above does not reflect RPS compliance, which is determined using a different methodology. ² Unspecified power is electricity that has been purchased through open market transactions and is not traceable to a specific generation source. ³ Renewable energy credits (RECs) are tracking instruments issued for renewable generation. Unbundled renewable energy credits (RECs) represent renewable generation that was not delivered to serve retail sales. Unbundled RECs are not reflected in the power mix or GHG emissions intensities above.								
For specific information about this electricity portfolio, contact:					Southern California Edison 1-800-655-4555			
For general information about the Power Content Label, visit:					https://www.energy.ca.gov/programs-and-topics/programs/power-source-disclosure-program			