

# **Addendum to the Mitigated Negative Declaration**

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**Application for Conditional Use Permit  
Conditional Use Permit 14-16**

**The Desert Hot Springs Green Horizon, Inc.  
aka  
2Mouths DHS, LLC**



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## CHAPTER ONE – INTRODUCTION

In 2017, the City of Desert Hot Springs City Council adopted a Mitigated Negative Declaration (MND) for the Desert Hot Springs Green Horizons, Inc. project (CUP 14-16), referred to herein as “previous project” or “MND”. The Green Horizons, Inc. MND evaluated the impacts associated with the proposed development of a single-story building totaling approximately 45,000 square feet (sf) and associated improvements on a 9.75-acre site in accordance with Desert Hot Springs Municipal Code 5.50 and 7.180.78. The facility was proposed to contain space for office, processing, warehouse, and the cultivation of marijuana. The analysis of the Desert Hot Springs Green Horizons, Inc. project identified several mitigation measures to address and mitigate potentially significant impacts to less than significant levels. The adopted Desert Hot Springs Green Horizons, Inc. MND is included as Appendix A.

The previous/proposed project is located on 9.75 acres of industrial desert land located on the southeast corner of the intersection of Little Morongo Road and Hacienda Avenue, in the City of Desert Hot Springs, California. The Assessor’s Parcel Number (APN) for the site is 663-270-001, within a Portion of NW ¼ of the SW ¼ of Section 36, Township 2 South, Range 4 East, San Bernardino Base & Meridian. The soil in the area consisted of fluvial sediments of the Mission Creek flood plain and cobbles and a few larger granitic boulders. The project area is moderately flat and multiple seasonal drainages traverse the property from north to south. The project site is bounded by developed and undeveloped property on all four sides. Surrounding land uses consist of industrial developments, residential developments, businesses, and open land.

As previously stated, the MND analyzed impacts associated with the proposed development of a single-story building totaling approximately 45,000 square feet (sf) and associated improvements. The revised Project proposes only to add additional uses within the already existing 45,000 sq. ft. building, no expansion or additional square footage is proposed. The added uses include cannabis manufacturing, and distribution.

In accordance with the California Environmental Quality Act (CEQA) and CEQA Guidelines, this addendum addresses the potential environmental impacts associated with the additional uses within the already existing building and provides an evaluation of potential environmental impacts in relation to the original project evaluated in the adopted MND, as well as the new environmental topics required by the most current CEQA Guidelines. The addendum is an informational document intended to be used in the planning and decision-making process as provided under Section 15164 of the CEQA Guidelines. The addendum does not recommend approval or denial of the proposed modifications of the previous project. The conclusion of this addendum is that the proposed changes to the project will neither result in new significant impacts nor substantially increase the severity of previously disclosed impacts beyond those already identified in the previously adopted MND. Thus, a subsequent MND is not required.

## **CHAPTER TWO – STATUTORY BACKGROUND**

The City of Desert Hot Springs is the CEQA lead agency responsible for the project. Under CEQA, an addendum to a certified Environmental Impact Report (EIR) or a Negative Declaration (ND) may be prepared if minor technical changes or additions to the proposed project are required or if none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR (or MND) have occurred (CEQA Guidelines Section 15164[b]). An addendum is appropriate if the project changes or modifications do not result in any new significant impacts or a substantial increase in severity of previously identified significant impacts. The addendum need not be circulated for public review (CEQA Guidelines Section 15164[c]); however, an addendum is to be considered along by the decision-making body prior to deciding on the project (CEQA Guidelines Section 15164[d]).

This MND addendum demonstrates that the environmental analysis, impacts, and mitigation requirements identified in the MND remain substantively unchanged by the revised Project description detailed herein and supports the findings that the proposed project does not raise any new issues and does not exceed the level of impacts identified in the previous MND. Further, rather than only focusing on the characterization of whether the project is “new” or “old”, the City has also evaluated the previous environmental document to determine if it retains any relevance in light of the proposed changes, and if any major revisions to the document are required due to the involvement of new, previously unstudied significant environmental effects. The subsequent review provisions of CEQA are designed to ensure that an agency proposing changes to a previously approved project explores environmental impacts not considered in the original environmental document. This assumes that some of the environmental impacts of the modified project are considered in the original environmental document, such that the original document retains relevance to the decision-making process. If it is wholly, irrelevant, then it is only logical that the agency starts over from the beginning. The city has determined that project changes will not require major revisions to the initial environmental document. Accordingly, recirculation of the MND for public review is not necessary pursuant to Section 15164 of the CEQA Guidelines. Therefore, a decision was made by the City of Desert Hot Springs not to prepare a subsequent Negative Declaration pursuant to Section 15162 of the CEQA Guidelines. To support this decision, the following analysis describes the proposed project modifications and the associated environmental analysis.

Based on the above, an Addendum is appropriate as none of the conditions calling for preparation of an EIR or subsequent MND have occurred (CEQA Guidelines, Section 15164).

## **CHAPTER THREE – SUMMARY OF ORIGINAL PROJECT**

The Proposed Project consists of the construction of a steel frame building on approximately 9.75 acres for the indoor cultivation of medical marijuana. The building would be located near the western boundary of the Proposed Project parcel and have a footprint of approximately 45,000 sq. ft., or 1.03 acres (Exhibit 2-3). The building would include an approximately 19,000 sq. ft. portion dedicated to office, processing, and warehouse uses. This portion of the building would have a maximum height of 34 feet, a width of 125 feet, and a length of 150 feet. This portion of the building would have metal building panel siding and a metal roof. The remaining approximately 26,000 sq. ft. portion of the proposed building would include a greenhouse (18,000 sq. ft.) and support rooms (8,000 sq. ft.). This portion of the building would have a maximum height of 21 feet and 6 inches, a width of 175 feet, and a length of 150 feet. This portion of the building would have

metal insulated panel siding and a glass roof. The overall architectural character would be that of an attractive, well-maintained industrial building. As required by City ordinance, the facility would include sufficient odor absorbing ventilation and exhaust systems.

Landscaping has been designed to balance aesthetic, water use, and security objectives. A rock lined detention basin would be constructed south of the proposed building. Fifteen exterior light emitting diode (LED) area lights would be installed along the exterior walls of the proposed building and in the parking lot. The facilities would include a total of 74 parking stalls and a perimeter security fence with a security gate. As required by City ordinance, the security plan would also include security cameras, alarms, and a licensed security guard. A 30-foot-wide fire lane would be provided along the east and southern side of the proposed building with access from the improved Hacienda Avenue.

The Proposed Project would also include off-site improvements including fully improving Hacienda Avenue from Little Morongo Road east for the entire length of the proposed building. A new 12-inch water main would also be installed for the entire length of the Proposed Project parcel along its northern boundary. Construction of the Proposed Project would take approximately eight months.

The Proposed Project includes a Conditional Use Permit (CUP) and a Development Agreement. Approval of these entitlements would render the Proposed Project in full compliance with City regulations. In addition, all medical marijuana cultivation operations and any related activities, such as transportation, manufacturing, and testing, are required to comply with all relevant State laws and any future laws that may be enacted.

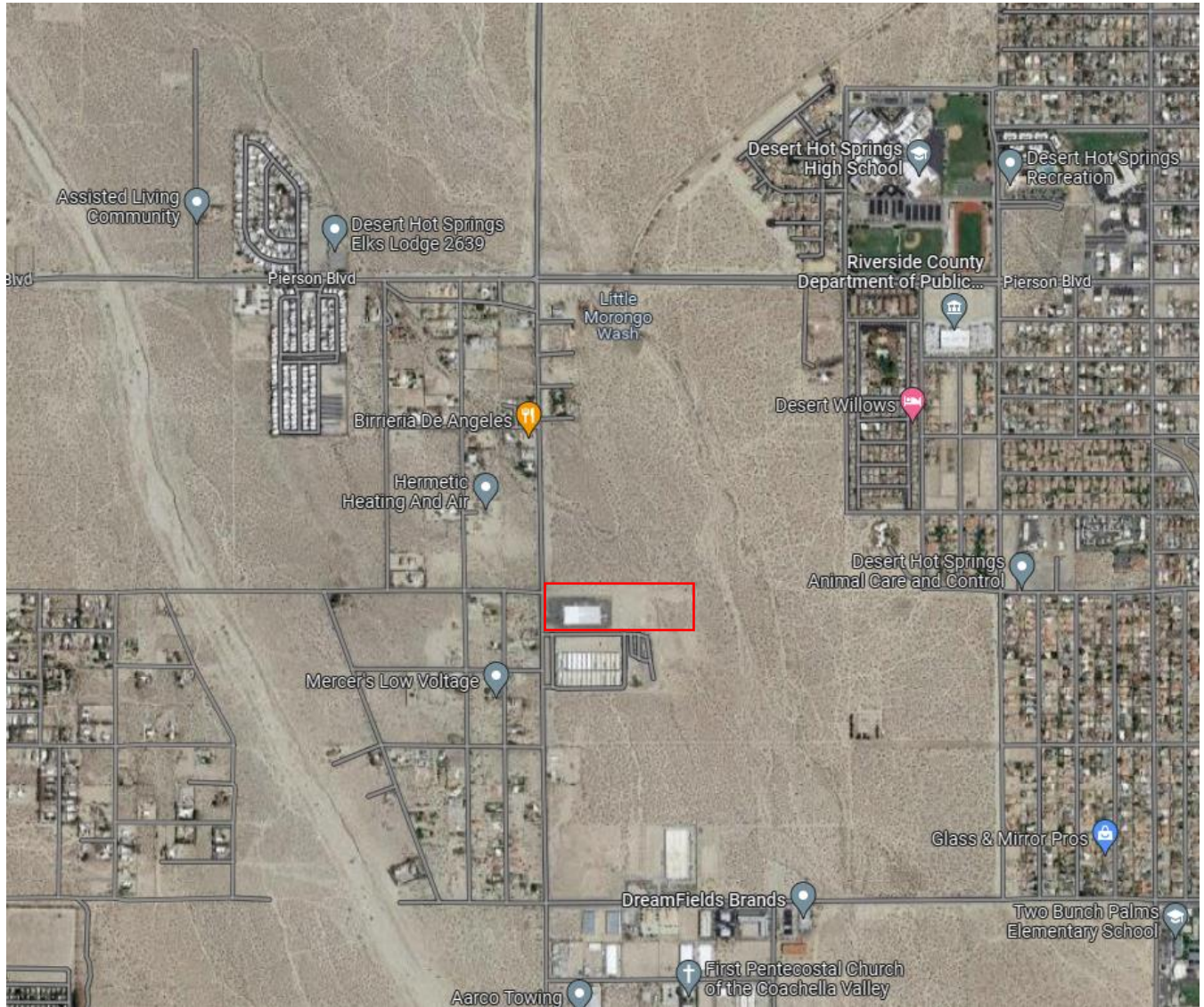
Operations would be similar to that of a standard retail nursery and does not include onsite sales. Hours would be consistent with Municipal Code Chapter 5.50. Medical marijuana facilities may operate between the hours of 8:00 am and 10:00 pm up to seven days per week. There would be no general public access to the facility at any time. All staff would be subject to thorough background checks in accordance with City regulations. Inbound deliveries would include such materials as fixtures and equipment, irrigation supplies, and soil amendments. Deliveries would typically be made with cargo vans or small box truck type delivery vehicles. All finished products would be package and loaded onto vehicles within the secure perimeter fence area. All deliveries, both inbound and outbound, would occur during the operating hours designated in the Municipal Code (8:00 am to 10:00 pm).

The location of the project site, initial renderings, and previous project site plan are shown below in Exhibit 1, 2, 3, 4, and 5.



**EXHIBIT 1**





**Map Features**

 Project Boundary

**EXHIBIT 2**







**EXHIBIT 4**



**EXHIBIT 5**

## CHAPTER FOUR – PROPOSED PROJECT REVISIONS

The Desert Hot Springs Green Horizon, Inc. is being amended as part of the 2Mouths DHS, LLC project. The 2Mouths DHS, LLC (referred herein as “2Mouths DHS, LLC” or “revised Project”). The revised Project incorporates the name change and additional two (2) changes:

- An added “Use” of Cannabis Manufacturing (Type 7) within the existing facility
- An added “Use” of Cannabis Distribution (Type 11) within the existing facility

As previously stated, the 2Mouths DHS, LLC. facility was designed as a single-story building totaling approximately 45,000 square feet (sf) with associated improvements. Associated improvements included fully improving Hacienda Avenue from Little Morongo Road east for the entire length of the proposed building.

The revised Project proposes to add two (2) “Uses”, Cannabis Manufacturing and Cannabis Distribution within the existing facility with no additional increase of square footage. The revised Project proposes an updated site plan to accommodate the changes in building size.

At full scale operations, the distribution and manufacturing project’s hours of operation will be from 7 am to 5 pm Pacific Standard Time, Monday through Friday. The cultivation hours of operations will be from 7 am to 4 pm Pacific Standard Time, Monday through Friday. Currently, the facility is operational from 6 am to 2:30 pm PST.

Total occupancy throughout the day for all three operations on site is estimated to be approximately 20 employees (5 required for manufacturing; 3 required for distribution; 5 required for cultivation, and additional employees needed for administrative and managerial tasks).

Cultivation activities would include growing cannabis (vegetation, flowering) and drying, trimming, and packaging dried cannabis flower and other cannabis biomass. Cultivation activities take place indoors.

Manufacturing activities would include acquiring extracted resin from other licensed manufacturers to infuse in edible (candy and chocolate) and nonedible manufactured products. At full-scale operations, the manufacturing license would include the extraction of resin from cannabis biomass while retaining high purity of cannabinoids using the closed-loop extraction systems onsite including using butane, propane, and CO2 extraction processes. The production and post-production or refining processes require various types of equipment, including vacuum oven, freezer, vacuum pump, diffusion pump, heaters, and chillers. Extracted oil will be infused into various products and packaged and labeled for testing and ultimately, retail sale. The facility packages and labels cannabis flower by hand and packages and labels pre-rolls using filling and labeling machines.

The products to be manufactured at full operations include vape cartridges, tinctures, concentrates, pre-rolls, infused pre-rolls, capsules, topicals, and edibles, including chocolates, candies, and potentially beverages.

Distribution activities will primarily be used to transfer cannabis goods between the licensed premises within the facility. The revised Project does not include any immediate plans to acquire distribution vehicles. Other licensed distributors will be used to pick up bulk flower for sale to other

distributors or manufacturers and finished product from the facility for transfer to retail locations and for final sale to customers. Within the designated distribution premises there are the following areas: shipping and receiving, packaging and labeling, records storage, finished cannabis goods storage, and quality assurance batch sampling area which includes, without limitation, overseeing the sampling of batches of cannabis goods by an agent of a licensed cannabis testing laboratory and conducting a quality assurance review prior to distribution that includes confirmation that the certificate of analysis received will be the correct certificate for the batch in question.

Entry to the site is from Little Morongo Road with only one access point. The southern side of the project will consist of a vehicle driveway, while the north and eastern side of the site will accommodate 92 parking spaces (2 parking spaces dedicated to ADA parking).

The revised Project does not propose any additional square footage or ground disturbance. The site encompasses 9.75-acres and is in accordance with Desert Hot Springs Municipal Code 17.180. The facility will contain space for office use, cannabis cultivation, manufacturing, volatile extraction, and distribution.

As required by CEQA, this Addendum analyzes the whole of the action, to the extent that information is available for the specific project.

The impact analysis contained herein will focus on whether the revised Project would result in any new or severe impacts not previously identified in the adopted MND.

The addendum analyzed the environmental impacts of the intended operation with the added "Uses" within the facility, including potential impacts to resources including water supply, air quality, and utilities resulting from commercial cannabis business activities.

The proposed floor plan is shown below, in Exhibit 6 - 11.

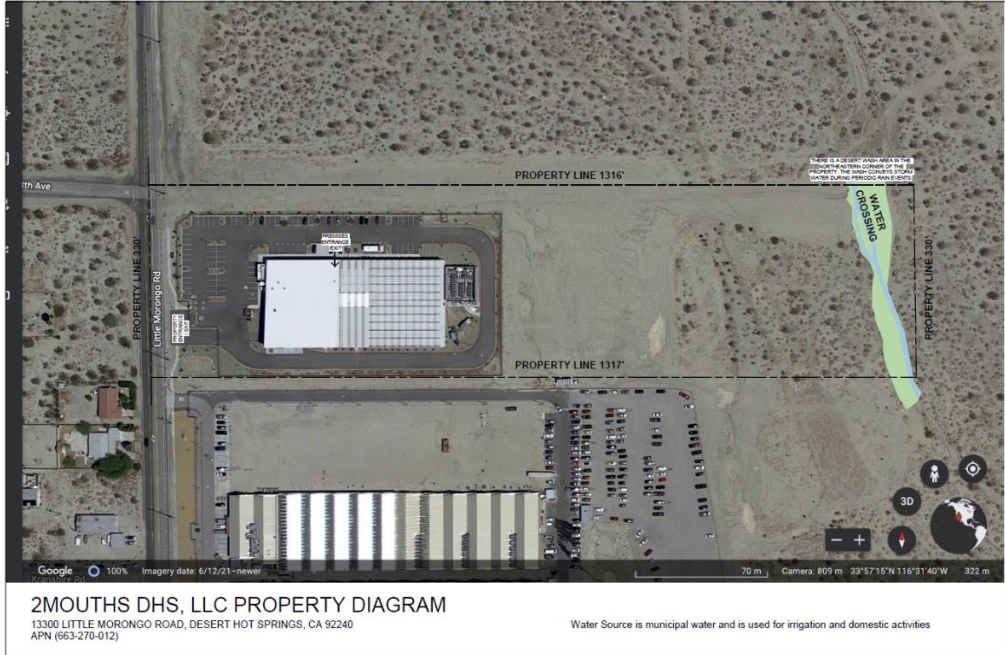


EXHIBIT 6

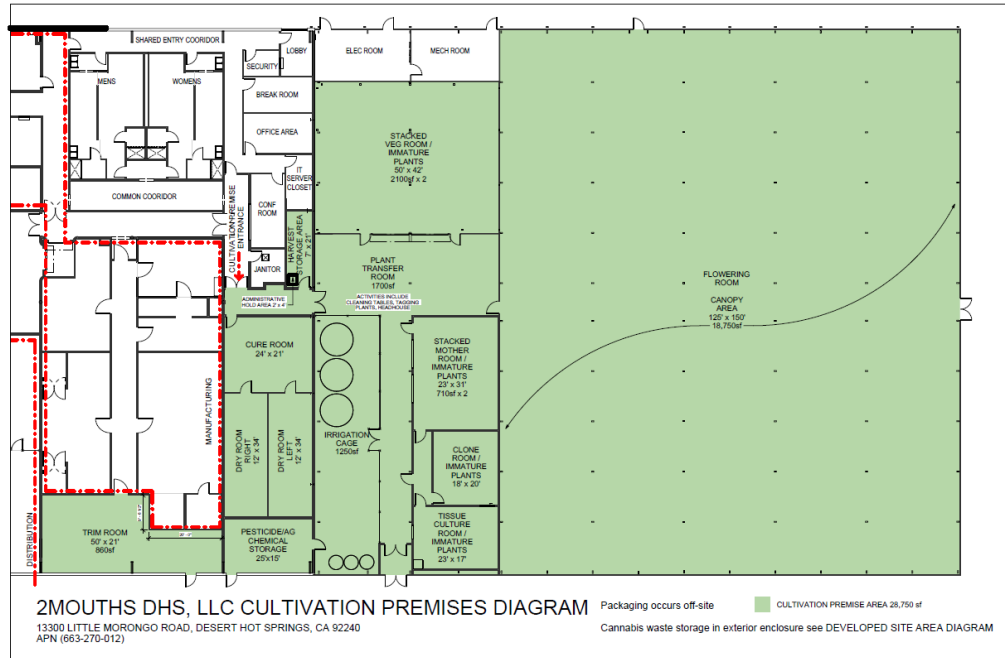
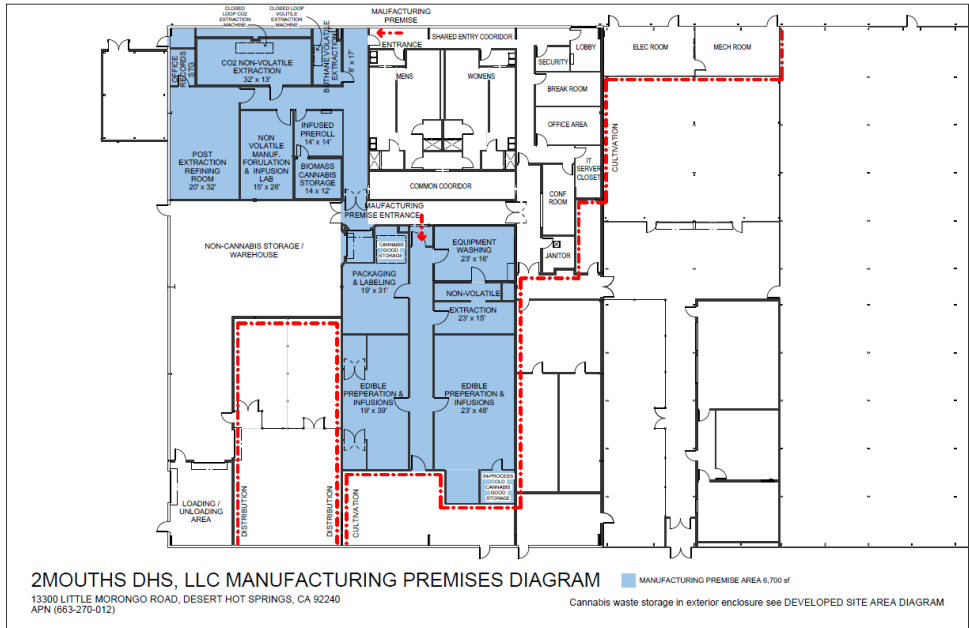


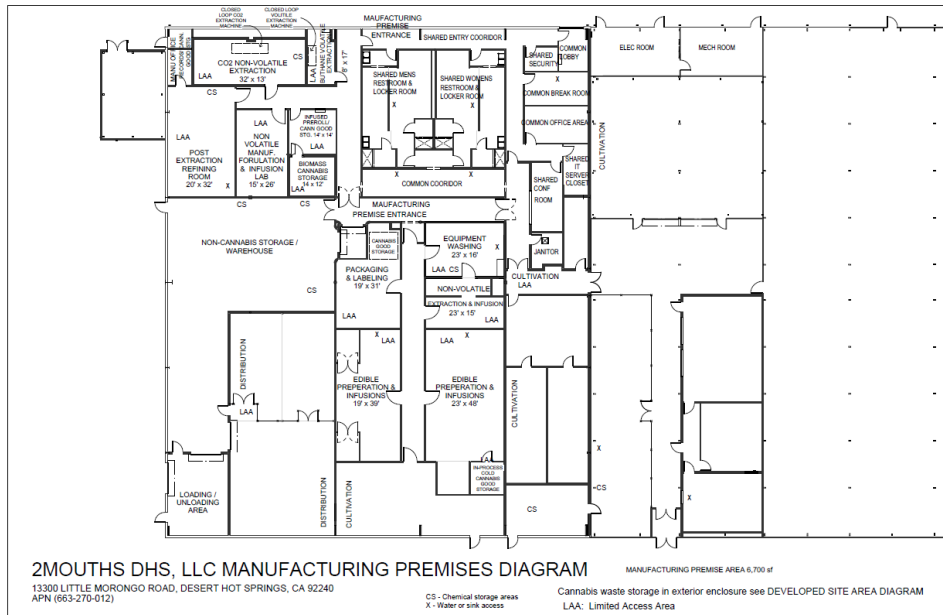
EXHIBIT 7





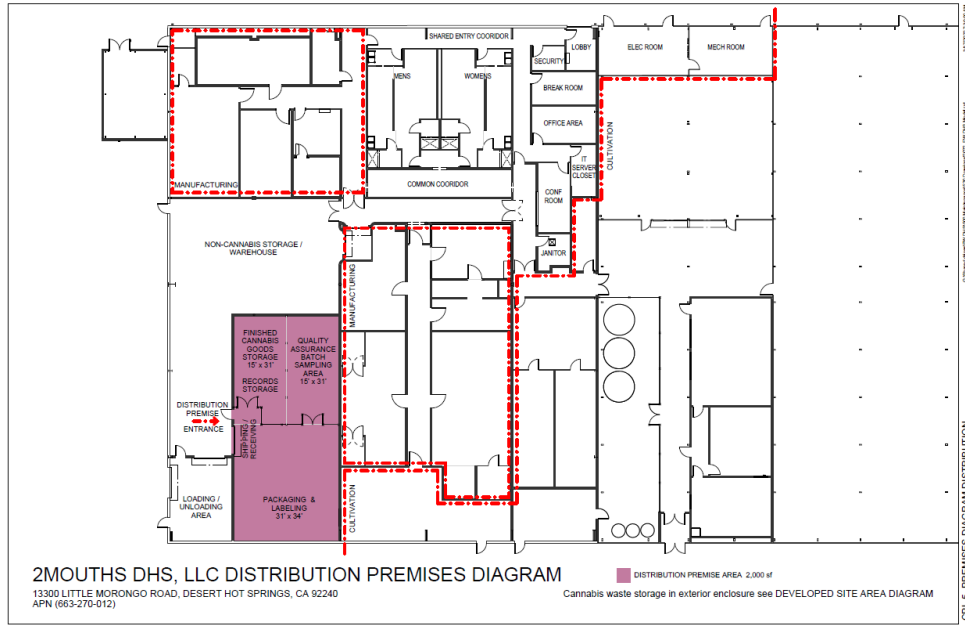
CPL 6 PREMISES DIAGRAM MANUFACTURING

**EXHIBIT 8**

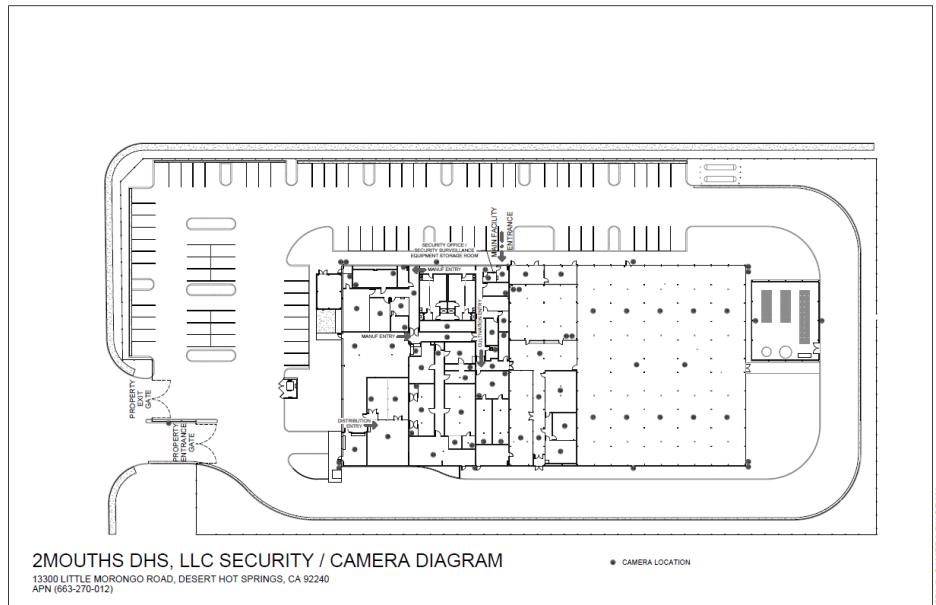


CPL 6 PREMISES DIAGRAM MANUFACTURING

**EXHIBIT 9**



**EXHIBIT 10**



**EXHIBIT 11**



## CHAPTER FIVE – ENVIRONMENTAL SETTING

The Project is located on 9.75 acres of disturbed desert land at the southeast corner of the intersection of Little Morongo Road and Hacienda Avenue, in the City of Desert Hot Springs, California.

The approximately 9.75-acre project site is located at the southeast corner of the intersection of Little Morongo Road and Hacienda Avenue. Soil in the area consists of fluvial sediments of the Mission Creek flood plain and greater Morongo Wash, including coarse-grained sand with a high density of gravel and cobbles and a few larger granitic boulders. The project area is moderately flat and multiple seasonal drainages traverse the property from north to south. The project site is surrounded by undeveloped land to the north and developed property on the remaining three sides. Surrounding land uses consist of industrial developments, residential developments, businesses, and open land.

## CHAPTER SIX – ENVIRONMENTAL IMPACT ANALYSIS

This document is an addendum to the previously adopted Desert Hot Springs Green Horizon, Inc. MND referenced above. This addendum provides the project specific environmental review pursuant to CEQA demonstrating the adequacy of the MND relative to the revised Project. As indicated above, the previous MND identified significant impacts and proposed mitigation measures related to biological resources and cultural resources. The analysis below discusses the adequacy and applicability of previous mitigation measures to the revised Project. In addition, the analysis below addresses whether any new or more severe impacts would result from the project revisions and whether any additional mitigation measures beyond those previously identified in the MND would be required.

The environmental resources and potential environmental impacts related to the new Project information are described in the subsections below.

Each subsection describes the potential environmental impacts that may result from the project with updated information, change to the project, or change to the circumstances under which the project is undertaken. For each checklist question, a discussion is provided to document the analysis followed by a concluding determination (conclusion). The following determinations are used in the checklist:

- **“No Impact on Resource”** is used when the Applicant’s activities would not affect the particular environmental resource.
- **“Minor Technical Change or Addition to MND (No New or Substantially More Severe Significant Impact)”** is used when the analysis determines that there is new information, a change to the Project, or a change to the circumstances under which the Project is undertaken, but there would be no new significant environmental effects or substantial increase in the severity of previously identified significant effects. This determination may be appropriate when the Applicant’s activities relate to the particular environmental resource at issue but nothing about the Applicant’s activities would require major revisions of the previous MND.

- “Substantial Project Change Requiring Subsequent or Supplemental MND or EIR” is used when the analysis determines substantial project changes are proposed that will require major revisions of the previous MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects, regardless of whether those new or increased effects may be mitigated to a less-than-significant level. If this determination is made, an addendum would not be sufficient for CEQA compliance.
- “Substantial Change in Circumstances Requiring Subsequent or Supplemental MND or EIR” is used when the analysis determines that substantial changes in the circumstances under which the project is undertaken will require major revisions to the previous MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects, regardless of whether those new or increased effects may be mitigated to a less-than-significant level. If this determination is made, an addendum would not be sufficient for CEQA compliance.
- “New Information of Substantial Importance Requiring Subsequent or Supplemental MND or EIR” is used when the analysis determines that new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous MND was adopted, shows any of the following:
  - The project will have one or more significant effects not discussed in the previous MND, regardless of whether those effects may be mitigated to a less-than-significant level;
  - Significant effects previously examined will be substantially more severe than identified in the previous MND, regardless of whether those effects may be mitigated to a less-than-significant level;
  - Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponent declines to adopt the mitigation measures or alternatives; or
  - Mitigation measures or alternatives that are considerably different from those analyzed in the previous MND would substantially reduce one or more significant effects on the environment, but the project proponent declines to adopt the mitigation measures or alternatives.
  - If this determination is made, an addendum would not be sufficient for CEQA compliance.

The following order of dialogue follows the environmental analysis categories currently included in CEQA Guidelines: Appendix G.

## I. *Aesthetics*

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<b>Aesthetics</b>	No Impact on Resource	Minor Technical Change or Addition to MND (No New or Substantially More Severe Significant Impact)	Substantial Project Change Requiring Subsequent or Supplemental MND or EIR	Substantial Change in Circumstances Requiring Subsequent or Supplemental MND or EIR	New Information of Substantial Importance Requiring Subsequent or Supplemental MND or EIR
<b>Would the Project:</b>					
a. Have a substantial adverse effect on a scenic vista?	X				
b. Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?	X				
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	X				
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	X				

### **2Mouths DHS, LLC. MND (Revised Project)**

#### **Discussion**

Similar to the MND, the revised Project would be located within a partially developed area with a light industrial zoning and General Plan designation in the City of Desert Hot Springs. The project is located at the southeast corner of the intersection of Little Morongo Road and 13th

Avenue/Hacienda Avenue. The City of Desert Hot Springs General Plan Light Industrial designation allows for business parks and the development of industrial uses entirely in enclosed buildings (City of Desert Hot Springs 2020). It also allows for cannabis cultivation, manufacturing, and distribution as a conditional use. The Proposed Project would be consistent with this designation while being subject to additional development and operational restrictions set forth by the Desert Hot Springs Municipal Code Chapters 17.180.

The project area and vicinity would be located in an area separate from the City of Desert Hot Springs' main residential and commercial districts. Existing land uses in the vicinity of the project area include Little Morongo Road and rural residential to the west, vacant land, and the Upper Mission Creek/Big Morongo Canyon Conservation Area to the north and east, and developed land to the south. The visual character of the district can be described as an industrial setting with parcels of disturbed/undisturbed land. The Proposed Project property has distant and partially obstructed views of the Santa Rosa Mountains toward the south, the San Jacinto Mountains to the southwest, and the San Bernardino Mountains to the northwest. The Project property has distant and unobstructed views of the Little San Bernardino Mountains to the north. No designated scenic vistas are in the vicinity of the site.

The Proposed Project consists of an industrial steel-framed cultivation, manufacturing, and distribution building, with surrounding parking within fenced property limits. The maximum height of the cultivation buildings would be approximately 34 feet. The building would be in earth tones with desert landscaping.

**Conclusion**

There are no state scenic highways located near the Proposed Project site. The Proposed Project features would blend with the existing setting and are not anticipated to adversely alter the existing viewshed of any scenic vistas no mitigation measures are required.

**II. Agricultural and Forestry Resources**

<b>Agricultural and Forestry Resources</b>	No Impact on Resource	Minor Technical Change or Addition to MND (No New or Substantially More Severe Significant Impact)	Substantial Project Change Requiring Subsequent or Supplemental MND or EIR	Substantial Change in Circumstances Requiring Subsequent or Supplemental MND or EIR	New Information of Substantial Importance Requiring Subsequent or Supplemental MND or EIR
<b>Would the Project:</b>					
a. 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 (FMMP) of the California Resources Agency, to nonagricultural use?	X				
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	X				
c. 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))?	X				
d. Result in the loss of forest land or conversion of forest land to non-forest use in a manner that will significantly affect timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, or other public benefits?	X				
e. Involve other changes in the existing environment that, because of their location or nature, could result in a conversion of Farmland to a nonagricultural use?	X				

**2Mouths DHS, LLC. MND (Revised Project)**

**Discussion**

The revised Project would not change the proposed uses of the project site. The project site does not include any active agricultural uses or agricultural resources, and is not adjacent to such uses, and is not zoned or designated for agricultural uses. Thus, similar to the MND, the revised Project would have no impact to agricultural resources.

**Conclusion**

Major revisions to the MND are not required as there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the previous MND.

**III. Air Quality**

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<b>Air Quality</b>	No Impact on Resource	Minor Technical Change or Addition to MND (No New or Substantially More Severe Significant Impact)	Substantial Project Change Requiring Subsequent or Supplemental MND or EIR	Substantial Change in Circumstances Requiring Subsequent or Supplemental MND or EIR	New Information of Substantial Importance Requiring Subsequent or Supplemental MND or EIR
<b>Would the Project:</b>					
a. Conflict with or obstruct implementation of the applicable air quality plan?	X				
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	X				
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a nonattainment area for an applicable	X				



federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?					
d. Expose sensitive receptors to substantial pollutant concentrations?	X				
e. Create objectionable odors affecting a substantial number of people?	X				

**2Mouths DHS, LLC. MND (Revised Project)**

**Discussion**

From the aspect of air quality, the project setting, and surrounding conditions have not incurred any substantial change in circumstances compared to the prior evaluation. While there are added “uses,” such as manufacturing, volatile extraction and distribution activities, there have been no substantial air quality changes requiring significant MND revisions. The revised Project would continue to occur within the same 9.75-acre parcel boundary and setting previously evaluated, without resulting in any increases in the physical ground disturbance or changes to the proposed operations. The most current version of California Emissions Estimator Model™ (CalEEMod Version 2016.3.2) was utilized to compare emission levels between the prior and revised Project. CalEEMod serves as an adopted platform to quantify construction emissions and operational emissions from land development projects. The software is designed to calculate criteria pollutants and greenhouse gas emissions using widely accepted methodologies from project-specific and accepted default data inputs. Sources of these methodologies and default data include, but are not limited to, the United States Environmental Protection Agency (USEPA) AP-42 emission factors, California Air Resources Board (CARB) vehicle emission models, studies commissioned by California agencies such as the California Energy Commission (CEC) and CalRecycle.

**Comparison of Construction-Related (Short-Term)  
Criteria Air Pollutant Emissions  
(Pounds/Day)**

	ROG	NOx	CO	SO2	PM10	PM2.5
Existing Project	16.1530 (Summer)	13.4767 (Winter)	9.2888 (Summer)	0.0143 (Summer)	24.3738 (Summer)	2.8831 (Summer)

Revised Project	15.8079	46.4937	28.5834	0.0607	4.1221	2.9390
SCAQMD Threshold	75	100	550	150	150	55
<b>Threshold Exceeded by Existing and Revised Project?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
<i>Note: The PM10 and PM2.5 emissions are based con compliance with Chapter 15.84 of the Desert Hot Springs Municipal Code and the local standard requirement to implement SCAQMD Rule 403 and 403.1 to control fugitive dust.</i>						

**Comparison of Operational (Long-Term)  
Air Pollutant Emissions  
(Pounds/Day)**

Emission Source	ROG	NOx	CO	SO2	PM10	PM2.5
Total Area Sources, Energy Use, Mobile Sources by Existing Project	0.6116 (Summer)	2.3808 (Winter)	3.8009 (Summer)	0.0119 (Summer)	0.6726 (Winter)	0.1944 (Winter)
Total Area Sources, Energy Use, Mobile Sources by Revised Project	1.1855	2.6374	5.2165	0.0243	1.7920	0.5033
SCAQMD Threshold	75	100	550	150	150	55
<b>Threshold Exceeded</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

The comparison of criteria air pollutant emissions provided above demonstrates that the modified building area and associated pavement installation for parking would not result in any SCAQMD threshold exceedances during construction and operation. The revised cultivation, packaging, extraction, manufacturing, and distribution activities proposed within the existing Project site would be the primary sources of odor from operations, in which, all operations take place indoors. Further pertaining to odor generation, the previously referenced Chapter 17.180 of the City’s Municipal Code are still required from the revised Project to ensure that detectable odors are addressed and mitigated.

**Conclusion**

The revised Project will utilize proper chemical management practices and closed loop extraction systems to minimize air pollutants due to evaporative losses during the extraction process. The volatile closed-loop and non-volatile extraction equipment will not produce air pollutants in capacities that create a significant impact.

The added “distribution” activities will only result in a minor increase of air pollution, due to the amount of traffic entering and exiting the facility. An uptick in traffic is attributed to additional staff,

deliveries, and product transportation. These factors would not cause a significant impact on air quality.

The revised Project impacts to air quality regarding conflicts with implementation of local air quality plan, considerable net increases in criteria pollutants for which the region is in non-attainment, exposure of sensitive receptors or other objectionable emissions are expected to remain at less than significant. Although the applicant is adding volatile extraction, manufacturing, and distribution activities, there would be no new significant impacts related to air quality described in the revised Project description.

#### ***IV. Biological Resources***

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<b>Biological Resources</b>	No Impact on Resource	Minor Technical Change or Addition to MND (No New or Substantially More Severe Significant Impact)	Substantial Project Change Requiring Subsequent or Supplemental MND or EIR	Substantial Change in Circumstances Requiring Subsequent or Supplemental MND or EIR	New Information of Substantial Importance Requiring Subsequent or Supplemental MND or EIR
<b>Would the Project:</b>					
a. 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 CDFW or USFWS?	X				
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by CDFW or USFWS?	X				

c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including marshes, vernal pools, and coastal wetlands) through direct removal, filling, hydrological interruption, or other means?	X				
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?	X				
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	X				
f. Conflict with the provisions of an adopted habitat conservation plan (HCP); natural community conservation plan; or other approved local, regional, or state HCP?	X				

**2Mouths DHS, LLC. MND (Revised Project)**

**Discussion**

Similar to the MND, the revised Project would result in no impact associated with sensitive habitat, riparian habitat, or other sensitive natural community, wetlands, or vernal pools as none of these resources were identified on the project site. Additionally, no impact was identified to any native

resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors or nursery sites. No conflicts with local policies or ordinances protecting biological resources such as a tree preservation policy or ordinance would occur under the revised Project. The activities proposed by the Applicant would take place primarily indoors.

**Conclusion**

Major revisions to the MND are not required as there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the previous MND.

**V. Cultural Resources**

<b>Cultural Resources</b>	No Impact on Resource	Minor Technical Change or Addition to MND (No New or Substantially More Severe Significant Impact)	Substantial Project Change Requiring Subsequent or Supplemental MND or EIR	Substantial Change in Circumstances Requiring Subsequent or Supplemental MND or EIR	New Information of Substantial Importance Requiring Subsequent or Supplemental MND or EIR
<b>Would the Project:</b>					
a. Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	X				
b. Cause a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5?	X				
c. Cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074	X				

d. Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	X				
e. Disturb any human remains, including those interred outside of formal cemeteries?	X				

**2Mouths DHS, LLC. MND (Revised Project)**

**Discussion**

The revised Project would not require construction beyond what was anticipated in the original MND within the project site. The overall square footage of the building is not proposed to change, no additional grading beyond what has already been completed in the MND has occurred. Similar to the MND, the revised Project would result in no impacts to historic resources, as defined in Section 15064.5 of the CEQA Guidelines. This includes any object, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant.

**Conclusion**

Major revisions to the MND are not required as there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the previous MND.

**VI. Energy**

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<b>Energy</b>	No Impact on Resource	Minor Technical Change or Addition to MND (No New or Substantially More Severe Significant Impact)	Substantial Project Change Requiring Subsequent or Supplemental MND or EIR	Substantial Change in Circumstances Requiring Subsequent or Supplemental MND or EIR	New Information of Substantial Importance Requiring Subsequent or Supplemental MND or EIR
<b>Would the Project:</b>					
a. Result in a potentially significant environmental impact due to wasteful, inefficient,					



or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation?	X				
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency??	X				

**2Mouths DHS, LLC. MND (Revised Project)**

**Discussion**

As described in this addendum the revised Project consists of a commercial cannabis cultivation, manufacturing, and distribution facility in an existing building with an amended CUP. Since the time the MND was adopted, the Applicant has determined that power for the existing building is and has been sourced through power from the electrical grid. (Southern California Edison)

Based on the applicant’s past energy bills, it is estimated that the facility requires approximately 20,500 kWh per day, 615,000 kWh per month, and 7,380,000 kWh annually (for all three licenses). This figure should be consistent between the prior operator and 2Mouths DHS, LLC. 2Mouths DHS, LLC acquired the facility from the prior cannabis operator who was approved for cultivation, manufacturing, and distribution activities. 2Mouths DHS, LLC’s licensed operations and plans for the facility are the same as the prior cannabis operator. As such, there is very little change in the energy usage from the prior use to the current use of the facility. While the entire facility is on the same meter, making it difficult to determine the energy needs of each license individually, provided are energy consumption estimates for each license based on the U.S. Energy Information Administration’s annual average kWh per square foot for similar uses.

2Mouths DHS, LLC utilized the U.S. Energy Information Administration’s annual average kWh per square foot rate of use for an office is 15.9kWh/SF which was used for the distribution space and common areas which include storage, offices, and restrooms, and 40.8 kWh/SF for the “Laboratory” category which is the closest option to manufacturers in 2016.

<b>Facility Use</b> (45,000 SF building)	Manufacturing	Distribution	Cultivation	Common Space
<b>Square Footage</b>	6,700 square feet	2,000 square feet	28,750 square feet	7,550 square feet
<b>Average kWh/SF Annually</b>	40.8	15.9	242	15.9
<b>Annual Usage (kWh)</b>	273,360	31,800	6,954,795	120,045

The Project would be required to comply with energy conservation standards applicable to most buildings throughout California as required by the California Energy Code. Compliance with these requirements would ensure that any impact to the environment due to wasteful, inefficient, or unnecessary consumption of energy would be less than significant and that the Project would not conflict with state or local plans for energy efficiency and renewable energy.

The lighting fixtures throughout the facility are energy efficient and the grow lighting in the canopy area are all LED lights (Fluence VYPR 2p 631W LED Grow Light). Based on estimates, the vast majority of the energy usage at the facility is attributed to cultivation use.

Southern California Edison has not seen any change in energy usage nor has 2Mouths DHS, LLC received any indication from the energy provider that additional upgrades would be required for 2Mouths DHS, LLC's operations.

**Conclusion**

Based on available information, all impacts related to energy use would be less than significant, including all activities from the cultivation, manufacturing, extraction, and distribution activities.

Major revisions to the MND are not required as there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the previous MND.

**VII. Geology and Soils**

<b>Geology and Soils</b>	No Impact on Resource	Minor Technical Change or Addition to MND (No New or Substantially More Severe Significant Impact)	Substantial Project Change Requiring Subsequent or Supplemental MND or EIR	Substantial Change in Circumstances Requiring Subsequent or Supplemental MND or EIR	New Information of Substantial Importance Requiring Subsequent or Supplemental MND or EIR
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<b>Would the Project:</b>					
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	X				
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.	X				
ii. Strong seismic ground shaking?	X				
iii. Seismic-related ground failure, including liquefaction?	X				
iv. Landslides?	X				
b. Result in substantial soil erosion or the loss of topsoil?	X				
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 an on-site or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	X				
d. Be located on expansive soil, as defined in Table 18-					

1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	X				
e. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	X				

**2Mouths DHS, LLC. MND (Revised Project)**

**Discussion**

The revised Project would not require any grading or construction beyond what has already been completed in the MND within the project site. The overall square footage of the building is not proposed to change, no additional grading beyond what was accounted for in the MND would occur. As such, no new or more substantial impacts related to geology and soils would occur. As discussed in the MND, compliance with the most current State building codes and regulations would ensure grading and development of the site reduces the impacts associated with geology and soils to less than significant, as concluded in the MND.

**Conclusion**

Major revisions to the MND are not required as there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the previous MND.

## VIII. Greenhouse Gas Emissions

Greenhouse Gas Emissions	No Impact on Resource	Minor Technical Change or Addition to MND (No New or Substantially More Severe Significant Impact)	Substantial Project Change Requiring Subsequent or Supplemental MND or EIR	Substantial Change in Circumstances Requiring Subsequent or Supplemental MND or EIR	New Information of Substantial Importance Requiring Subsequent or Supplemental MND or EIR
<b>Would the Project:</b>					
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?		X			
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	X				

### 2Mouths DHS, LLC. MND (Revised Project)

#### Discussion

Operations included in the proposed project will create on-going greenhouse gases through the consumption of electricity and natural gas, cannabis plants, cannabis cultivation chemicals, delivery of products, operating manufacturing equipment, operating volatile extraction equipment, increased transit of additional staff, and the transportation for the disposal of hazardous waste.

The project setting and surrounding conditions have not incurred any substantial change in circumstances compared to the prior evaluation. However, in recent years, there has been considerable progress in the statewide GHG emissions reduction trends toward the target levels that serve as the basis of compliance and attainment. On July 11, 2018, CARB announced in a press release (No. 18-37) that greenhouse gas pollution in California fell below 1990 levels for

the first time since emissions peaked in 2004, an achievement roughly equal to taking 12 million cars off the road or saving 6 billion gallons of gasoline a year. Moreover, according to the CARB report on California Greenhouse Gas Emissions for 2000 to 2017 (published in 2019), which tracks the trends of GHG emissions, California’s GHG emissions have followed a declining trend between 2007 and 2017. In 2017, emissions from GHG emitting activities statewide were 424 million metric tons of CO<sub>2</sub> equivalent (MMTCO<sub>2</sub>e), 5 MMTCO<sub>2</sub>e lower than 2016 levels and 7 MMTCO<sub>2</sub>e below the 2020 GHG Limit of 431 MMTCO<sub>2</sub>e.

**Comparison of Total Project Greenhouse Gas Emissions**

Unmitigated Emission Source	Emissions (Metric tons per year)
	Total CO <sub>2</sub> E
Total CO <sub>2</sub> E (All Sources) from Existing Project	642.85
Total CO <sub>2</sub> E (All Sources) from Revised Project Emissions	642.85
Threshold	10,000
Threshold Exceeded by Existing or Revised Project?	NO

The revised Project will utilize proper chemical management practices and closed loop extraction systems to minimize VOC emissions due to evaporative losses during the extraction process. The volatile closed-loop and non-volatile extraction equipment will not produce greenhouse gasses in capacities that create a significant impact. CO<sub>2</sub> is safely vented through a pressure release pipeline; butane and propane are evaporated via a C1D1 vacuum oven and fume hood.

The added “distribution” activities will only result in a minor increase of greenhouse gas emissions, due to the amount of traffic entering and exiting the facility. An uptick in traffic is attributed to additional staff, deliveries, and product transportation. These factors would not cause a new significant impact.

**Conclusion**

Due to the low quantity of extraction equipment and small quantity of volatile chemicals used, the increase in greenhouse gas emissions would have no significant impact.

The additional “Uses” and changes to the Project would not cause a new significant impact. There would be no substantial change in the significance of previously identified GHG impacts described in the MND.

Because impacts to air quality/greenhouse gases during the operation of the revised Project would be less than significant, no further mitigation is required.



## IX. Hazards and Hazardous Materials

Hazards and Hazardous Materials	No Impact on Resource	Minor Technical Change or Addition to MND (No New or Substantially More Severe Significant Impact)	Substantial Project Change Requiring Subsequent or Supplemental MND or EIR	Substantial Change in Circumstances Requiring Subsequent or Supplemental MND or EIR	New Information of Substantial Importance Requiring Subsequent or Supplemental MND or EIR
<b>Would the Project:</b>					
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?		X			
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?		X			
c. Emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	X				

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, create a significant hazard to the public or the environment?	X				
e. Be located within an airport land use plan area or, where such a plan has not been adopted, be within 2 miles of a public airport or public use airport and result in a safety hazard for people residing or working in the study area?	X				
f. Be located within the vicinity of a private airstrip and result in a safety hazard for people residing or working in the study area?	X				
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	X				
h. Expose people or structures to a significant risk of loss, injury or death involving					

wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	X				
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**2Mouths DHS, LLC. MND (Revised Project)**

**Discussion**

The revised Project would not require any grading or construction beyond what has already been completed in the MND within the project site. The overall square footage of the building is not proposed to change, no additional grading beyond what was accounted for in the MND would occur. As such, no new or more impacts related to hazards or hazardous materials would occur. As discussed in the MND, compliance with industry and manufacturer standards regarding the handling, use, delivery, and storage of hazardous materials would ensure impacts of accidental release or the handling of hazardous materials during construction of the site would be less than significant.

The revised Project would result in an expanded scope of project operations within the Project site, which includes the exposure to, use, storage, transport, and disposal of potentially hazardous materials. The changes to the Project proposed by the Applicant include the new “Uses” for the Project including manufacturing, volatile extraction, and distribution. The updated activities included in the revised Project’s operations are not expected to involve a significant number of hazardous materials which would require routine transport, use or disposal of hazardous materials that would pose a hazard to public health and safety or the environment (*All chemicals and hazardous materials that are used in the revised facility activities are located in a list below*).

The revised Project consists of an indoor marijuana cultivation facility, manufacturing facility, volatile extraction facility, and distribution facility that would involve cleaning compounds, sanitizing agents, solvents, and potentially flammable materials during the operation of the facilities. As a result, the operator would be subject to manufacturer specifications and local, state, and federal regulations for the handling of such substances. These guidelines would protect against incidental release, injury, and/or contamination. Additionally, the project proponent would be required to provide onsite storage facilities and containers designed to contain and isolate these substances. Employees would also be required to receive training including safety rules to prevent personal and public risk. Solid waste produced by the proposed Project would be disposed of in designated containers per local, state, and federal regulations.

The revised project is not expected to handle any significant quantities of hazardous materials. Any use of potentially hazardous materials is expected to be in small quantities, and would be managed on-site with proper containers and facilities, as required by industry standards.

All activities and operations would occur in enclosed facilities. Specifically, all volatile and non-volatile extraction will take place in dedicated, segregated limited access areas of the facility. Within the limited access areas, all chemicals related to the extraction process and applicable facility operations will be stored in safe chemical storage areas.

Storage locations for all hazardous materials are located in exhibit 12 – 14.

Butane/Propane Storage Location (3 tanks per cage)

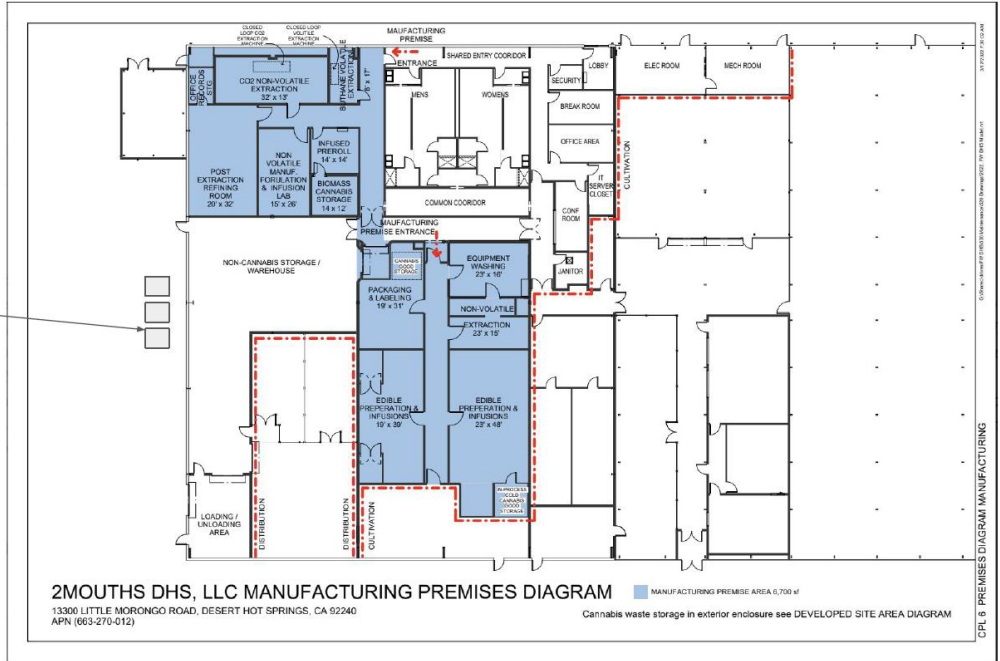


EXHIBIT 12

CO2 Storage Location

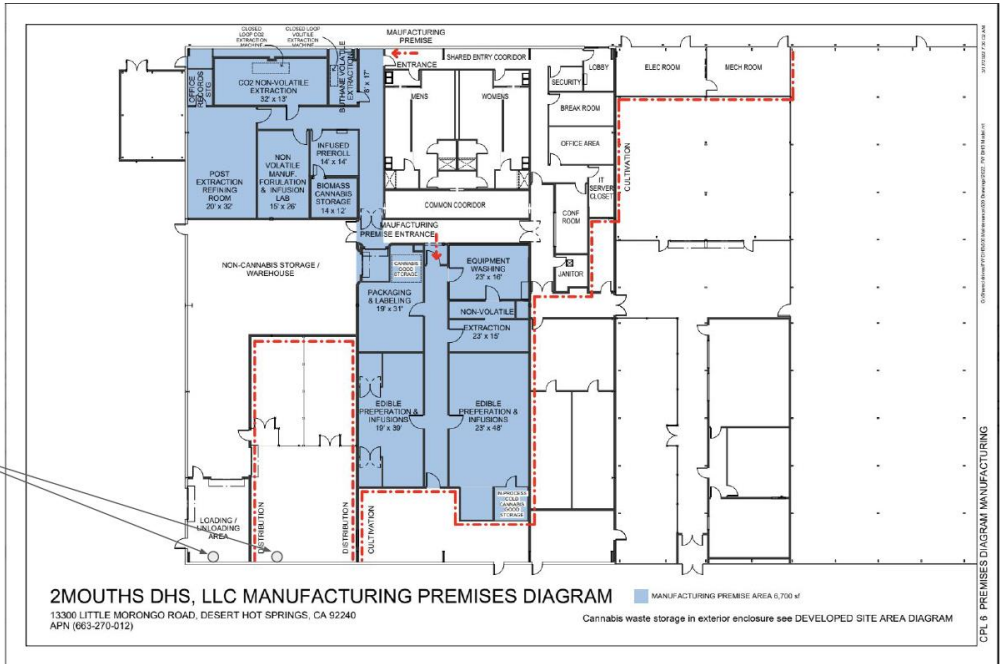
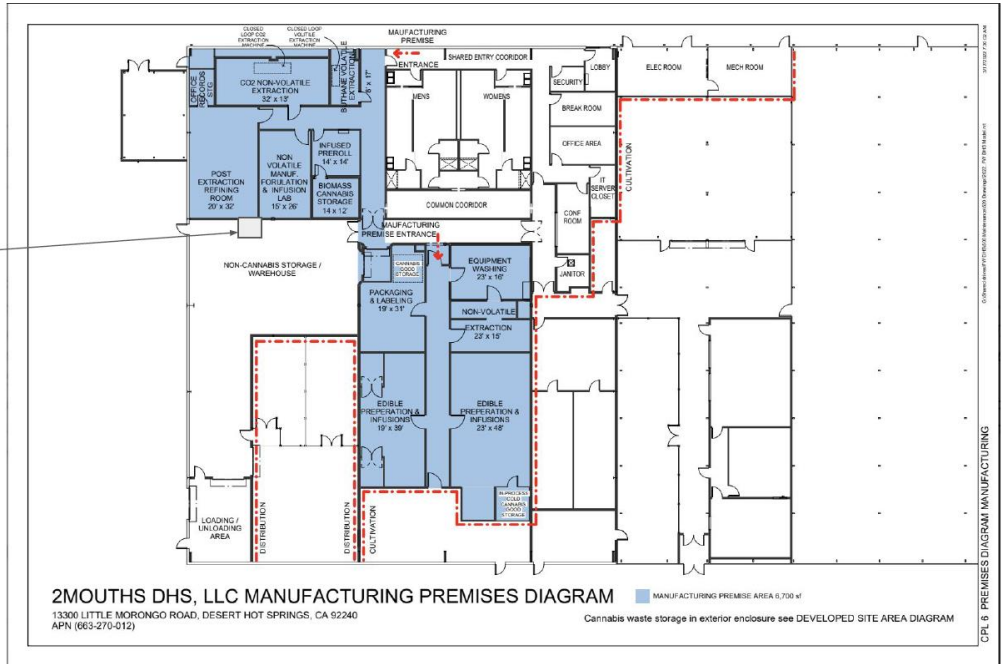


EXHIBIT 13

Ethanol Storage Location



**EXHIBIT 14**

### List and Description of all Materials Utilized On-Site

Material Name	Material	Use in Mfg Process	Food	MSDS Location
Compressed CO <sub>2</sub> - beverage grade	Solvent	Initial biomass extraction	Yes	Extraction SDS Binder
Ethanol 200 proof, grain derived	Solvent	Winterization, removal of lipids/ impurities	Yes	Extraction SDS Binder
Propylene glycol	Chemical	Chiller fluid	Yes	Extraction SDS Binder
Duratherm-S (silicone-based heat transfer fluid)	Chemical	Heater fluid	No	Extraction SDS Binder
Duratherm XLT-2	Chemical	Chiller fluid	No	Extraction SDS Binder
Isopropyl alcohol 70%	Solvent	Used to sanitize surfaces before performing ATP	No	Extraction SDS Binder
Isopropyl alcohol 99%	Solvent	Used to sanitize surfaces before performing ATP	No	Extraction SDS binder
Butane n-	Solvent	Initial biomass extraction	No	Extraction SDS binder

### Quantity of Hazardous Material That May Be Used - At Full Capacity

Hazardous Material	Amount Used
Ethanol 200 Proof	4 Gallons Per Day
Butane	60 Lbs. Per Day
Propane	60 Lbs. Per Day
CO <sub>2</sub>	400 Lbs. Per Day

### Quantity of Hazardous Material Stored - At Full Capacity

Hazardous Material	Amount Stored
Ethanol 200 Proof	(2) – 55 Gallon Drums
Butane	(6) – 100 Lb. Tanks
Propane	(3) – 100 Lb. Tanks
CO <sub>2</sub>	(16) – 100 Lb. Tanks

### Quantity of Hazardous Material Stored - Currently

Hazardous Material	Amount Stored
Ethanol 200 Proof	(2.5) – 55 Gallon Drums
Butane	NONE
Propane	(7) – 100 Lb. Tanks
CO <sub>2</sub>	NONE

During the operation of closed-loop extraction systems (Extraction unit EP-273 and Extraction unit 12000015), potentially hazardous materials (butane, co2, isopropyl alcohol, ethanol, Duratherm) will be utilized and disposed of safely post-operation. All volatile extraction equipment (Extraction unit EP-273 and Extraction unit 12000015) has been inspected and approved as part of The Riverside County Fire Department’s Certificate of Occupancy issuance. Less than significant impacts as a result of the routine transport, use, or disposal of hazardous materials are anticipated for the proposed Project and no mitigation measures are required.

There is no waste generated by the hazardous material used in the extraction or refining processes. The CO2 is safely vented through a pressure release pipeline. The ethanol used is recovered and recycled. The butane and propane are evaporated via a C1D1 vacuum oven and fume hood.

As addressed in the original MND, the facility (and all associated areas) has onsite 24-hour camera surveillance systems in place, including in areas where hazardous materials are stored, used, and disposed of.

Furthermore, the revised Project will continue to be enclosed with a perimeter fence and a security guard during all hours of operation. The Proposed Project would have less than significant impacts related to the release of hazardous materials into the environment and no further mitigation measures are required.

### Waste Composition Break Down by Product Type

Waste Type	Amount of Waste
Liquid Flammable	30 gallons / month
Post-Manufactured Biomass (non-hazardous)	99.5 gallons / month

All waste within the facility will be stored in labeled containers to identify the contents and include a statement describing the waste included, cannabis, hazardous, or otherwise. If and when hazardous waste is being handled, all personnel will wear personal protective equipment (“PPE”) while doing so.

Management of the revised Project will assess waste and determine the types and amounts of chemical or hazardous waste generated. These findings will be used to guide a determination of the appropriate measures for storage, handling, and disposal of the chemical or hazardous waste, including the amount of time hazardous waste is allowed to accumulate on site.

Employees of the proposed project will record and maintain quarterly chemical and hazardous waste assessments in a waste log. This shall include the location, type, and quantity of hazardous materials. The waste log for the last six (6) months will be kept on-premises, while the records for the current year and seven (7) preceding years may be stored off-site.

Any hazardous waste that is generated will be removed from the site by a professional waste disposal service (Gaiaca) who is qualified to pick up and dispose of hazardous or chemical waste.

### **Conclusion**



Although changes have occurred since the original MND, the revised Project operations would be conducted with all hazardous material safety, security, storage, and disposal practices in compliance with industry, manufacturer, State, and Federal standards. All of the same regulatory framework would apply, and the revised Project would not involve changes that would increase the severity of a potential impact related to hazardous and hazardous materials.

The MND project site is not located within one-quarter mile of a school. Therefore, impacts would be less than significant. The project is not within an airport land use plan, or within two miles of an airport or airstrip. Therefore, there would be no impacts.

The revised Project would not increase the building square footage, implementation of the revised Project would not physically interfere with an adopted emergency response plan or emergency evacuation plan. Similar to the MND, the site plan configuration of the revised Project includes fire truck accessible drive aisles to ensure adequate emergency response access on-site. The proposed design would be subject to a standard review process by the Riverside County Fire Department to ensure that the site-specific emergency access, water pressure, and other pertinent criteria are met by the revised Project. Less than significant impacts are expected.

As determined in the MND, the project is located outside of areas designed as Very High/High/Moderate FHSZ for State and Federal Responsibility Areas, and Very High FHSZ for Local Responsibility Areas. The project is not located near wildlands and impacts were determined to be less than significant. The revised Project will not result in grading or construction of the property analyzed in the MND. Therefore, impacts of wildfires would be less than significant, similar to the MND.

Major revisions to the MND are not required as there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the previous MND.

Based on the activities proposed by the Applicant and the low amount (30/gal per month) of hazardous chemicals being used and disposed of in the extraction, manufacturing, and cultivation processes these additions would not result in any new significant impacts pertaining to hazards and hazardous materials.

## ***X. Hydrology and Water Quality***

<b>Hydrology and Water Quality</b>	<b>No Impact on Resource</b>	<b>Minor Technical Change or Addition to MND (No New or Substantially More Severe Significant Impact)</b>	<b>Substantial Project Change Requiring Subsequent or Supplemental MND or EIR</b>	<b>Substantial Change in Circumstances Requiring Subsequent or Supplemental MND or EIR</b>	<b>New Information of Substantial Importance Requiring Subsequent or Supplemental MND or EIR</b>
<b>Would the Project:</b>					
a. Violate any water quality standards or waste discharge requirements?	X				
b. 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 (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?	X				
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 that would result in substantial erosion or siltation on site or off site?	X				
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 that would result in flooding on-site or off-site?	X				
e. Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	X				
f. Otherwise substantially degrade water quality?	X				
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?	X				
h. Place within a 100-year-flood hazard area structures that would impede or redirect floodflows?	X				
i. 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?	X				
j. Contribute to inundation by seiche, tsunami, or mudflow?	X				

**2Mouths DHS, LLC. MND (Revised Project)**

**Discussion**

From the aspect of hydrology and water quality, the project setting, and surrounding conditions have not incurred any substantial change in circumstances compared to the prior evaluation. The revised Project would continue to occur within the same 9.75-acre parcel boundary and setting previously evaluated, without resulting in any area increases in the day operational-related business. The additional “Uses” will be within the existing building footprint, with no changes to the driveway, and parking lot configuration as well as the NPDES compliance plans (SWPPP and WQMP) for review and approval by the appropriate agencies.

**Conclusion**

There is no aspect of the revised Project involving deviations from the regulatory requirements and the associated stormwater controls. Therefore, after following the regulatory program requirements designed specifically prevent hydrologic, stormwater and surface water impairments, the impacts resulting from the revised Project would continue to be less than significant. The revised plans would not result in new or greater significance levels than those disclosed in the previous MND.

## ***XI. Land Use and Planning***

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<b>Land Use and Planning</b>	No Impact on Resource	Minor Technical Change or Addition to MND (No New or Substantially More Severe Significant Impact)	Substantial Project Change Requiring Subsequent or Supplemental MND or EIR	Substantial Change in Circumstances Requiring Subsequent or Supplemental MND or EIR	New Information of Substantial Importance Requiring Subsequent or Supplemental MND or EIR
<b>Would the Project:</b>					
a. Physically divide an established community?	X				
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	X				
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	X				

**2Mouths DHS, LLC. MND (Revised Project)**

**Discussion**

The revised Project would not create any new land use barriers, preclude the development of surrounding parcels, or otherwise divide or disrupt the physical arrangement of the surrounding established community, as the areas surrounding the project site are mostly developed and consist of light industrial buildings and uses. The site is designated as Light Industrial by the City’s General Plan, and zoned Light Industrial with an Industrial Cannabis Overlay. These land use and zoning designations would not change as a result of implementing the revised Project. In addition, the revised Project would not consist of components that would conflict with any applicable habitat conservation plans or natural conservation plans and will be required to pay development fees to support the acquisition of conservation lands of the CVMSHCP.

**Conclusion**

Similar to the MND, the revised Project includes administrative review (Municipal Code 17.180.) and Regulatory Permit (Municipal Code Chapter 5.50) to thoroughly evaluate the design and operation of the proposed facility and render it in full compliance with City regulations. No new or more severe impacts associated with land use and planning would occur as a result of implementing the revised Project.

Major revisions to the MND are not required due to changes to the project as there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the previous MND.

**XII. Mineral Resources**

<b>Mineral Resources</b>	No Impact on Resource	Minor Technical Change or Addition to MND (No New or Substantially More Severe Significant Impact)	Substantial Project Change Requiring Subsequent or Supplemental MND or EIR	Substantial Change in Circumstances Requiring Subsequent or Supplemental MND or EIR	New Information of Substantial Importance Requiring Subsequent or Supplemental MND or EIR
<b>Would the Project:</b>					
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?	X				

b. 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?	X				

**2Mouths DHS, LLC. MND (Revised Project)**

**Discussion**

Similar to the MND, the revised Project would not be feasible to use the project site for mining operation due to the site’s zoning and land use designation. Additionally, the site is surrounded by existing light industrial facilities. The City’s General Plan does not identify the project site as an existing or past extraction site. Therefore, implementation of the revised Project would result in less than significant impacts related to the loss of local, regional, or state mineral resources, similar to the MND.

**Conclusion**

Major revisions to the MND are not required as there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the previous MND.

### ***XIII. Noise***

<b>Noise</b>	No Impact on Resource	Minor Technical Change or Addition to MND (No New or Substantially More Severe Significant Impact)	Substantial Project Change Requiring Subsequent or Supplemental MND or EIR	Substantial Change in Circumstances Requiring Subsequent or Supplemental MND or EIR	New Information of Substantial Importance Requiring Subsequent or Supplemental MND or EIR
<b>Would the Project:</b>					
a. Exposure of persons to or generation of noise levels in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies?	X				
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	X				
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	X				
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels	X				



existing without the project?					
e. For a project located within an airport land use plan area, or, where such a plan has not been adopted, within 2 miles of a public airport or public-use airport, would the project expose people residing or working in the project site to excessive noise levels?	X				
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project site to excessive noise levels?	X				

**2Mouths DHS, LLC. MND (Revised Project)**

**Discussion**

The revised Project would not require any grading or construction beyond what has already been completed in the MND within the project site. The overall square footage of the building is not proposed to change, no additional grading beyond what was accounted for in the MND would occur. As such, no new or more impacts related to noise would occur. Impacts would be less than significant, similar to the MND.

Similar to the MND, construction activities associated with the revised Project are only permitted between 7:00 a.m. and 5:00 p.m. Monday through Saturday (per the City Municipal Code). During daylight savings time, construction is permitted between 6:00 a.m. and 6:00 p.m. Monday through Saturday. Construction is not permitted on Sundays. During construction, the revised Project is also expected to follow common industry standards that will help limit noise level increases. For example, all construction equipment, fixed or mobile, should be equipped with properly operating and maintained mufflers and the engines should be equipped with shrouds. Approved haul routes shall be used to minimize exposure of sensitive receptors to potential adverse levels from hauling

operations. All construction equipment shall be in proper working order and maintained to reduce backfires.

**Conclusion**

Similar to the MND, construction noise generated by the revised Project is expected to be less than significant.

Operation of the revised Project is the same as the operations analyzed in the MND. All permanent operations of the revised Project shall be conducted in the interior of enclosed structures, facilities, and buildings, as mandated by the local zoning ordinance. All cannabis cultivation, manufacturing, and distribution operations, including materials management, will occur indoors and within the fenced limits. Outdoor activities will be limited. These include vehicular access and circulation in the project’s parking lot and drive aisles; access to storage structures and to the trash enclosures for waste management (disposal and pick-up); access to the outdoor utilities for maintenance purposes (e.g., chillers, septic or sewer systems, storm drain system components). The nature of operations would occur in the proposed structures and are not expected to result in the generation of noise levels that would surpass the community noise and land use compatibility standards.

Regarding noise generated by project traffic, the revised Project would not introduce a substantial amount of additional vehicle travel to the site. The revised Project would not significantly alter on- or off-site noise generation, as the proposed uses would be similar to the existing uses in the surrounding area.

Similar to the MND, the noise generating uses and equipment associated with the revised Project would be located indoors and within enclosed structures. The facility will not introduce new outdoor noise-generating equipment. Similar to the MND, noise levels associated with the revised Project would not conflict with the City’s Noise Ordinance or the General Plan noise standards, resulting in less than significant impacts.

Major revisions to the MND are not required due to changes to the project as there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the previous MND.

***XIV. Population and Housing***

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<b>Population and Housing</b>	No Impact on Resource	Minor Technical Change or Addition to MND (No New or Substantially More Severe Significant Impact)	Substantial Project Change Requiring Subsequent or Supplemental MND or EIR	Substantial Change in Circumstances Requiring Subsequent or Supplemental MND or EIR	New Information of Substantial Importance Requiring Subsequent or Supplemental MND or EIR
<b>Would the Project:</b>					

a. Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	X				
b. Displace a substantial number of existing housing units, necessitating the construction of replacement housing elsewhere?	X				
c. Displace a substantial number of people, necessitating the construction of replacement housing elsewhere?	X				

**2Mouths DHS, LLC. MND (Revised Project)**

**Discussion**

The revised Project would not displace any existing housing units or people, as the site is already developed and located in the Light Industrial district in Desert Hot Springs. therefore, similar to the MND, the revised Project would result in no impacts to existing housing.

The revised Project would result in the operation of cannabis cultivation, cannabis manufacturing, and cannabis distribution facility, and similar to the MND, may encourage relocation for employment. However, the number of employees would be relatively minor considering the facility’s purpose in comparison to other light industrial uses. Therefore, similar to the MND, impacts to population growth would be less than significant.

**Conclusion**

Major revisions to the MND are not required as there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the previous MND.

## ***XV. Public Services***

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<b>Public Services</b>	No Impact on Resource	Minor Technical Change or Addition to MND (No New or Substantially More Severe Significant Impact)	Substantial Project Change Requiring Subsequent or Supplemental MND or EIR	Substantial Change in Circumstances Requiring Subsequent or Supplemental MND or EIR	New Information of Substantial Importance Requiring Subsequent or Supplemental MND or EIR
<b>Would the Project:</b>					
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or a 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 following public services:	X				
i. Fire Protection?	X				

ii. Police Protection?	X				
iii. Schools?	X				
iv. Parks?	X				
v. Other Public Facilities?	X				

**2Mouths DHS, LLC. MND (Revised Project)**

**Discussion**

Similar to the MND, the revised Project would result in no impacts to parks and other public facilities. However, the revised Project would result in less than significant impacts to fire protection, police services, and school facilities, similar to the proposed project. Therefore, the revised Project will be required to comply with the City’s Development Impact Fees (DIF) to assist with the funding of public facilities and services, including fire and police services. The revised Project would also be required to pay developer impact fees to the PSUSD to assist in offsetting impacts to school facilities. The developer impact fees for the district have increased since the time the MND was written.

**Conclusion**

The revised Project would be required to pay the most current fees. However, with the payment of the DIFs for public facilities and services, and developer impact fees for PSUSD, the revised Project would result in less than significant impacts to public facilities, similar to the MND.

Major revisions to the MND are not required as there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the previous MND.

**XVI. Recreation**

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Recreation	No Impact on Resource	Minor Technical Change or Addition to MND (No New or Substantially More Severe Significant Impact)	Substantial Project Change Requiring Subsequent or Supplemental MND or EIR	Substantial Change in Circumstances Requiring Subsequent or Supplemental MND or EIR	New Information of Substantial Importance Requiring Subsequent or Supplemental MND or EIR

<b>Would the Project:</b>					
a. 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?	X				
b. Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	X				

**2Mouths DHS, LLC. MND (Revised Project)**

**Discussion**

The revised Project does not propose any recreational facilities, and the construction of the proposed industrial facility would not generate a new population base that would warrant the need for additional recreational facilities. Therefore, similar to the MND, the revised Project would not result in impacts related to recreational facilities in the city.

**Conclusion**

Major revisions to the MND are not required as there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the previous MND.

**XVII. Transportation**

Transportation	No Impact on Resource	Minor Technical Change or Addition to MND (No New or Substantially More Severe Significant Impact)	Substantial Project Change Requiring Subsequent or Supplemental MND or EIR	Substantial Change in Circumstances Requiring Subsequent or Supplemental MND or EIR	New Information of Substantial Importance Requiring Subsequent or Supplemental MND or EIR
<b>Would the Project:</b>					
a. 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?	X				
b. 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	X				

agency for designated roads or highways?					
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	X				
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	X				
e. Result in inadequate emergency access?	X				
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	X				

**2Mouths DHS, LLC. MND (Revised Project)**

**Discussion**

Operation of the revised Project will result in a slightly increased rate of traffic. Traffic increases are due in part to an increased employee count, associated with manufacturing and distribution



activity, which have been added as “uses.” While the revised Project would not result in a large increase in traffic levels compared to the existing developed condition, the nature and intensity of operations that would occur in the proposed structures are not expected to result in the generation of traffic levels that would surpass the City of Desert Hot Springs standards.

**Conclusion**

The revised Project would not introduce a substantial amount of additional vehicle trips to the site. The revised Project would not result in increased vehicular conflicts, as the proposed uses would be similar to the prior proposed uses and existing uses in the surrounding area. Following compliance with Standard Conditions including adjacent roadway improvements and payment of TUMF and Development Impact Fees, the project is expected to result in less than significant impacts similar to the previous project.

Major revisions to the MND are not required as there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the previous MND.

***XVIII. Tribal Cultural Resources***

<b>Tribal Cultural Resources</b>	No Impact on Resource	Minor Technical Change or Addition to MND (No New or Substantially More Severe Significant Impact)	Substantial Project Change Requiring Subsequent or Supplemental MND or EIR	Substantial Change in Circumstances Requiring Subsequent or Supplemental MND or EIR	New Information of Substantial Importance Requiring Subsequent or Supplemental MND or EIR
<b>Would the Project:</b>					
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the	X				

landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:					
a. 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 section 5020.1(k), or	X				
b. 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	X				

**2Mouths DHS, LLC. MND (Revised Project)**

**Discussion**

The revised Project would not require any construction beyond what was anticipated in the original MND since the “Uses” are within the already developed project site. While the “Uses” of the building are to add cannabis manufacturing, and cannabis distribution, no additional grading beyond what was already anticipated in the MND would occur. Similar to the MND, the revised Project would result in no impacts to historic resources as defined in Public Resource Code Section 5020.1(k).

**Conclusion**

Major revisions to the MND are not required as there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the previous MND.

***XIX. Utilities and Service Systems***

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<b>Utilities and Service Systems</b>	No Impact on Resource	Minor Technical Change or Addition to MND (No New or Substantially More Severe Significant Impact)	Substantial Project Change Requiring Subsequent or Supplemental MND or EIR	Substantial Change in Circumstances Requiring Subsequent or Supplemental MND or EIR	New Information of Substantial Importance Requiring Subsequent or Supplemental MND or EIR
<b>Would the Project:</b>					
a. Exceed wastewater treatment requirements of the applicable RWQCB?	X				
b. Require or result in the construction of new water or wastewater treatment facilities or an expansion of existing facilities, the construction of which could cause significant environmental effects?	X				
c. Require or result in the					

construction of new stormwater drainage facilities or an expansion of existing facilities, the construction of which could cause significant environmental effects?	X				
d. Have sufficient water supplies available to serve the Project from existing entitlements and resources, or would new or expanded entitlements be needed?	X				
e. Result in a determination by the wastewater treatment provider that serves or may serve the Project that it has inadequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?	X				
f. Be served by a landfill with insufficient permitted capacity to accommodate the Project's solid waste disposal needs?	X				
g. Comply with federal, state, and local statutes					

and regulations related to solid waste?	X				
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**2Mouths DHS, LLC. MND (Revised Project)**

**Discussion**

Similar to the findings in the MND, the revised Project would not result in significant impacts to utilities and service systems. The revised Project would not require grading or construction since the “Uses” will be within the already existing building that has been analyzed in the MND within the project site, and the site is fully built out and in operation. As such, no new or more impacts related to utilities and service systems would occur.

Similar to the MND, wastewater generated by the revised Project is expected to be minimal. The revised Project is not expected to exceed wastewater treatment requirements of the State Regional Water Quality Control Board (SRWQCB) (Colorado River Basin). In addition, City and other local and governmental agency review will ensure compliance with all current and applicable wastewater treatment requirements. No new or expanded treatment facilities are anticipated from project implementation. Similar to the MND, the revised Project would result in less than significant impacts to wastewater treatment facilities.

Like the MND, the revised Project will be required to comply with all construction requirements and best management practices through the life of the project. Standard engineering procedures currently in place require that all final grading and hydrology plans be submitted to the City of Desert Hot Springs for review and approval prior to the issuance of a grading permit. Less than significant impacts are expected, similar to the MND.

The estimated water usage annually for the cannabis operation is 3,645,000 gallons, with 80% of the water usage required for the cultivation operation and the remaining 20% required for manufacturing. The distribution operation requires very little water usage and is mainly related to normal handwashing and cleaning of storage areas.

In regard to water supply, the revised Project would be expected to follow water conservation guidelines to mitigate impacts to public water supplies. Examples of these water conservation methods include water conserving plumbing fixtures, drought tolerant landscaping, and irrigation water recovery systems. Less than significant impacts to water supply are expected.

Less than significant impacts to solid waste are expected. Additionally, the revised Project would comply with all applicable solid waste statutes and guidelines. No impacts are expected relative to solid waste statutes and regulations.

**Conclusion**

Major revisions to the MND are not required as there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the previous MND.

## XX. Wildfire

Wildfire	No Impact on Resource	Minor Technical Change or Addition to MND (No New or Substantially More Severe Significant Impact)	Substantial Project Change Requiring Subsequent or Supplemental MND or EIR	Substantial Change in Circumstances Requiring Subsequent or Supplemental MND or EIR	New Information of Substantial Importance Requiring Subsequent or Supplemental MND or EIR
<b>Would the Project:</b>					
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	X				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	X				
b. 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?	X				
c. 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??	X				
d. 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?	X				

**2Mouths DHS, LLC. MND (Revised Project)**

**Discussion and Conclusion**

Proposed project modifications would not change any of the MND’s conclusions regarding wildfire. The MND found that the Project site is not located in or near a moderate, high, or very high fire zone designation. Therefore, the Project would have no impact on wildfire hazard. No new or more severe impacts regarding wildfire compared to those described in the MND would occur.

**XXI. Mandatory Findings of Significance**

<b>Mandatory Findings of Significance</b>	No Impact on Resource	Minor Technical Change or Addition to MND (No New or Substantially More Severe Significant Impact)	Substantial Project Change Requiring Subsequent or Supplemental MND or EIR	Substantial Change in Circumstances Requiring Subsequent or Supplemental MND or EIR	New Information of Substantial Importance Requiring Subsequent or Supplemental MND or EIR
<b>Would the Project:</b>					

<p>a. Does the Project have the potential to 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?</p>	<p>X</p>				
<p>b. 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</p>	<p>X</p>				



probable future projects.)					
c. Does the Project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	X				

**2Mouths DHS, LLC. MND (Revised Project)**

**Conclusion**

Similar to the MND, the original project resulted in potentially significant impacts to biological resources, cultural resources, tribal cultural resources, and paleontological resources. However, all of these impacts were reduced to less than significant through implementation of the MND mitigation measures. No additional impacts were identified as a result of the revised Project, and no deficiencies were identified related to the City’s General Plan as a result of the additional manufacturing, distribution, and cultivation activities.

There is no new information of substantial importance, which was not known and could not have been known at the time of the application, that identifies a new significant impact.

Changes and proposed updates to the Project would not be considered substantial. The addition of new “Uses” and “activity” to the Project would not cause a new significant impact or substantial increase in the severity of a previously identified significant impact (CEQA Guidelines, Section 15162(a)(1)) that would require major revisions to the MND. All new impacts associated with the added “activities” would be similar to the impacts previously analyzed in the MND.

There is sufficient evidence in support of the City of Desert Hot Springs’ determination that the minor changes to the Project do not meet the conditions for preparing an EIR or subsequent MND under CEQA Guidelines, Section 15162, and Section 15164.

## CHAPTER SEVEN – SOURCES

- The Desert Hot Springs Green Horizon, Inc. // 2Mouths DHS, LLC Cannabis License Application Materials and Operational Documentation (2Mouths DHS, LLC)
- The City of Desert Hot Springs - Conditional Use Permit 14-16 - Desert Hot Springs Green Horizons, Inc. Medical Marijuana Cultivation Facility (City of DHS,
- Draft Initial Study and Mitigated Negative Declaration - Desert Hot Springs Green Horizons Inc. (City of DHS - October 14, 2016)
- DCC-Provided CEQA Memorandums (DCC, 2023)

## APPENDIX A – MITIGATED NEGATIVE DECLARATION (2016)