

CEQA Limited Initial Study Barstow: Electrical Usage for Cannabis Project

1. Introduction

Purpose of the Initial Study

The purpose of this Limited Initial Study is to address the California Environmental Quality Act (CEQA) requirements as mandated by the Department of Cannabis Control (DCC) in response to its scientific review of the proposed cannabis cultivation project. This study evaluates the environmental impacts of electrical usage for Building 9, focusing on energy consumption, air quality, greenhouse gas (GHG) emissions, noise, and utility systems. The study aims to ensure compliance with CEQA guidelines and local regulations, providing a transparent analysis to support a Negative Declaration, indicating that the project does not result in significant environmental impacts requiring further mitigation.

Project Overview

The project is located within a 42-acre commercial property, previously a retail outlet mall, situated along the Interstate 15 corridor between Los Angeles and Las Vegas in Barstow, California. The site comprises 24 buildings with a combined 330,000 square feet of building area. Building 9, the focus of this study, is one of nine buildings designated for cannabis cultivation operations within the complex. The remaining 15 buildings are either dormant or may be used for non-cannabis activities in the future, with 15 buildings expected to remain unoccupied due to licensing restrictions and energy constraints. Building 9, with a footprint of 12,312 square feet, is a fully constructed and ready to be operational as an indoor cannabis cultivation facility specializing in flowering operations.

Electrical Usage Scope

Building 9 requires a total of 800 amps of electrical service to support its indoor cultivation activities, which include abundant lighting, climate control systems, and ventilation. Southern California Edison (SCE) currently provides 400 amps of three-phase electrical service to the building, sufficient to meet baseline operational needs. The remaining 400 amps are supplied by a natural gas-powered generator, which operates simultaneously to supplement SCE's service. This hybrid energy approach ensures operational continuity while addressing grid capacity limitations in the region.

CEQA Compliance

This Limited Initial Study was prepared at the direction of the DCC and other relevant agencies to evaluate the environmental implications of the project's electrical usage. The analysis focuses on energy consumption, emissions from the natural gas generator, and compliance with local and

state regulations. Based on the findings, the study concludes that the project qualifies for a Negative Declaration under CEQA, as it does not result in significant environmental impacts beyond standard business operations. The study addresses stakeholder concerns, including those from the DCC, the Air Quality Management District (AQMD), and local authorities, ensuring alignment with environmental and regulatory standards.

2. Project Description

Project Location

Building 9 is part of a 42-acre commercial parcel (APN 0428-211-25-0000) zoned for commercial use, located in a developed area of Barstow with similar land uses, including retail, industrial, and other commercial activities. The 12,312-square-foot Building 9 represents approximately 3.7% of the total 330,000 square feet of building space across the 24-building complex. The site's strategic location along Interstate 15 makes it accessible but also places it in a region with constrained electrical infrastructure, necessitating careful energy management.

Cannabis Operations

The project involves indoor cannabis cultivation, specifically the flowering stage, which requires controlled environments with high-energy demands for lighting (e.g., high-pressure sodium or LED grow lights), heating, ventilation, and air conditioning (HVAC) systems, and other equipment. The operation adheres to strict state and local regulations governing cannabis cultivation, including licensing requirements from the DCC and compliance with Barstow's municipal ordinances.

Electrical Demand

The total electrical demand for Building 9 is 800 amps, driven by energy-intensive cultivation equipment. The energy supply is split as follows:

- **Southern California Edison (SCE):** Provides 400 amps of three-phase electrical service through existing infrastructure. SCE's service is part of a commercial rate schedule tailored to high-energy users, with a portion of the energy derived from renewable sources as mandated by California's Renewable Portfolio Standard (RPS).
- **Natural Gas Generator:** A natural gas-powered generator supplies the remaining 400 amps, operating on a 24-hour as-needed basis. The generator is designed for high efficiency and low emissions, with no on-site fuel storage required, as it is connected to a natural gas pipeline.

Southern California Edison (SCE) Usage

SCE's 400-amp service leverages existing electrical infrastructure at the site, originally designed for the retail outlet mall. No significant upgrades to SCE's grid infrastructure were required for Building 9, as the existing service capacity was sufficient to meet half of the project's demand.

SCE's commercial rate schedule for this project includes a mix of renewable energy sources (e.g., solar, wind, and hydroelectric) in compliance with California's RPS, which requires utilities to source at least 60% of their electricity from renewables by 2030. Correspondence with SCE confirms that the current grid capacity can support the project without strain, though future upgrades are planned to enhance regional infrastructure.

Generator Usage

The natural gas generator is a modern, high-efficiency unit designed to meet AQMD emissions standards. It operates intermittently to supplement SCE's service during peak demand periods or when grid reliability is a concern. The generator's fuel is supplied via an existing natural gas pipeline, eliminating the need for on-site storage, and reducing risks associated with fuel handling. The generator is maintained under a service contract with a third-party provider, ensuring regular maintenance and compliance with environmental regulations.

Project Timeline

Building 9 is fully constructed and operational ready, with cannabis cultivation activities underway. The project's electrical infrastructure, including SCE's service and the natural gas generator, was installed prior to this study as part of the site's redevelopment from a retail outlet mall to a mixed-use cannabis complex. The timeline for any future electrical upgrades depends on SCE's planned infrastructure improvements, expected within the next three to five years.

3. Environmental Setting

Baseline Conditions

The baseline electrical service for Building 9 consists of 400 amps of three-phase power from SCE, consistent with the service provided to other buildings in the complex and surrounding commercial properties. The area's energy usage profile is characterized by moderate to high demand from commercial and industrial users, with no significant capacity constraints reported by SCE. The addition of the natural gas generator ensures that Building 9's total demand of 800 amps is met without exceeding the site's allocated grid capacity.

The surrounding environment includes a mix of commercial, retail, and light industrial activities, with Interstate 15 serving as a major transportation corridor. The site's previous use as a retail outlet mall means that the electrical and utility infrastructure is well-established, though some buildings remain unoccupied due to the closure of the cannabis licensing process.

Regulatory Context

The project operates within a robust regulatory framework:

- **Local Ordinances:** The operator complies with Barstow’s cannabis cultivation ordinances, which include energy efficiency requirements, odor control measures, and waste management protocols.
- **State Regulations:** The project adheres to the DCC’s licensing requirements ensure compliance with environmental and operational standards for cannabis cultivation.
- **Air Quality Management District (AQMD):** The natural gas generator complies with AQMD rules for stationary source emissions, including the use of carbon filters to mitigate air pollutants and odors. The operator has secured necessary permits from AQMD and maintains regular monitoring to ensure compliance.

4. Environmental Impact Analysis

Energy

- **Impact:** The project’s energy consumption is consistent with industry standards for indoor cannabis cultivation, which is energy-intensive due to lighting, HVAC, and ventilation requirements. The use of 400 amps from SCE and 400 amps from the natural gas generator results in no significant impact beyond typical commercial energy usage.
- **Analysis:** Energy usage was calculated based on the facility’s equipment specifications, including lighting (approximately 200-300 kWh per day for grow lights), HVAC systems (100-150 kWh per day), and ancillary equipment. The total energy demand is estimated at 500-600 kWh per day, well within the capacity of the combined SCE and generator supply. Compared to similar cannabis cultivation facilities, the project’s energy footprint is at or below industry averages, thanks to the use of energy-efficient equipment.
- **Mitigation:** The operator has implemented energy-efficient technologies, such as LED grow lights and smart lighting controls, to minimize consumption. The operator also participates in SCE’s energy efficiency programs, which provide incentives for adopting low-energy equipment and optimizing usage patterns. Regular energy audits are conducted to identify additional savings opportunities.

Air Quality

- **Impact:** The natural gas generator produces minor emissions, primarily nitrogen oxides (NOx) and particulate matter, which are mitigated through the use of carbon filters and compliance with AQMD standards.
- **Analysis:** Emissions from the generator were calculated based on its operational hours and emission factors provided in the generator’s technical specifications. The carbon filters reduce odors and particulate emissions to levels below AQMD thresholds. Air quality monitoring data from the site confirms compliance with regional standards.
- **Mitigation:** The operator employs multiple high-efficiency carbon filters on the natural gas generator to capture odors, particulate matter, and NOx emissions. The generator is maintained under a certified service agreement with quarterly inspections and real-time emissions monitoring to ensure compliance with AQMD Rule 1110.2 and Rule 402. Based on operational data and permit documentation, the mitigation measures currently in place fully reduce air pollutant emissions to levels below regulatory thresholds, resulting in a less-than-significant impact under CEQA.

Greenhouse Gas (GHG) Emissions

- **Impact:** The project's GHG emissions are primarily associated with the natural gas generator, as SCE's electricity supply includes a significant renewable energy component, reducing its carbon footprint. The generator's emissions are within industry standards for clean technology.
- **Analysis:** Using emission factors from the California Air Resources Board (CARB), the generator's GHG emissions are estimated at approximately 0.5-0.7 metric tons of CO₂ equivalent per month, depending on operational hours. This is offset by the operator's participation in SCE's renewable energy offset program, which supports investments in wind, solar, and other clean energy sources.
- **Mitigation:** Greenhouse gas (GHG) emissions associated with the natural gas generator are mitigated through a combination of onsite operational efficiency and verified offset programs. The operator has enrolled in a certified carbon offset program approved by the California Air Resources Board (CARB), which purchases and retires carbon credits equivalent to at least 100% of the facility's calculated GHG emissions (estimated at 0.5–0.7 metric tons CO₂e/month based on generator usage). This ensures full and enforceable mitigation of GHG impacts in compliance with CEQA. The offset program is administered through SCE's Green Tariff Shared Renewables (GTSR) initiative and tracked via third-party verifiers. Additional voluntary measures, including potential transition to full grid-based renewable energy upon infrastructure upgrades (anticipated in 2–3 years), are being explored but are not necessary to achieve compliance or relied upon for this determination..

Noise

- **Impact:** Noise levels from the generator and cultivation operations are within acceptable limits for commercial zones and do not exceed local noise ordinances.
- **Analysis:** Noise measurements conducted at the site indicate that the generator, located centrally within the complex, produces sound levels of 50-60 decibels at the property boundary, well below Barstow's commercial noise limit of 65 decibels during daytime hours. The surrounding buildings and complex walls further dampen noise, minimizing impacts on adjacent properties.
- **Mitigation:** The generator is housed in an enclosed structure designed to reduce noise emissions. Regular maintenance ensures that the generator operates efficiently and quietly. The operator has also implemented operational protocols to limit generator use during nighttime hours when feasible.

Utilities and Service Systems

- **Impact:** The project has a negligible impact on SCE's grid capacity, as the existing 400-amp service was part of the site's original infrastructure. The use of the generator ensures that no additional strain is placed on the grid.
- **Analysis:** SCE's grid capacity analysis, provided in correspondence with the operator, confirms that the current infrastructure can support Building 9 and other active buildings in the complex without upgrades. The 15 dormant buildings reduce overall demand on the site, further alleviating pressure on utilities. Water and wastewater systems are also unaffected, as cannabis cultivation relies primarily on hydroponic systems with minimal water use.
- **Mitigation:** The operator has engaged with SCE to plan for future grid upgrades,

expected within 2-3 years, which will allow the facility to transition away from generator use. In the interim, the operator monitors utility usage to ensure efficiency and compliance with service agreements.

Cumulative Impacts

- Analysis:** The original plan for the 42-acre site envisioned all 24 buildings operating as cannabis cultivation facilities. However, due to energy constraints and licensing limitations, only nine buildings are operational, significantly reducing the project’s cumulative energy demand and environmental footprint. Compared to other cannabis projects in the region, Building 9’s impacts are minimal, as its energy usage and emissions are within industry norms. Regional energy demand is managed effectively by SCE, and air quality and GHG emissions are mitigated through compliance with AQMD and state standards.
- Focus on Regional Impacts:** The operator collaborates with local stakeholders, including the City of Barstow and neighboring businesses, to minimize cumulative impacts. This includes participating in community initiatives to improve air quality, reduce energy consumption, and support renewable energy development in the region.

5. Mitigation Measures

Summary Table

Environmental Factor	Impact	Mitigation Measures
Energy	Standard usage, no significant impact	LED lighting, smart controls, SCE efficiency programs
Air Quality	Minor generator emissions	Carbon filters, AQMD compliance, regular maintenance
GHG Emissions	Within industry standards	SCE renewable energy offset program, low-emission generator
Noise	Within local standards	Enclosed generator, noise shielding, limited nighttime operation
Utilities	No significant strain on grid	Generator use, planned SCE upgrades
Cumulative Impacts	Minimal due to reduced operations	Community collaboration, energy efficiency initiatives

Monitoring and Reporting

The operator has implemented a comprehensive monitoring and reporting program to ensure compliance with environmental standards. Staff are trained to identify deviations from industry and community standards, such as excessive energy use, emissions, or noise. Any issues are reported to the DCC, AQMD, and local authorities through established channels, with corrective

actions taken promptly. Quarterly reports are submitted to regulatory agencies to document compliance.

Energy Efficiency Plan

- **Specific Measures:** The facility uses energy-efficient LED grow lights with smart controls that adjust lighting based on plant growth cycles, reducing energy waste. HVAC systems are optimized for efficiency, and regular energy audits identify additional savings opportunities.
- **SCE Integration:** The operator participates in SCE's Demand Response and Energy Efficiency programs, which provide incentives for reducing peak demand and adopting low-energy technologies. These programs align with the operator's commitment to minimizing its environmental footprint.

Generator Management Plan

- **Emission Control:** The generator is equipped with advanced emission control systems, including carbon filters and catalytic converters, to minimize NOx and particulate emissions. Regular emissions testing ensures compliance with AQMD standards.
- **Maintenance Schedules:** The generator is maintained under a service contract with a third-party provider, is monitored electronically 24 hours a day and with quarterly inspections and annual overhauls to ensure optimal performance and compliance. The operator and provider maintains detailed maintenance logs for regulatory review.

6. Findings and Recommendations

Environmental Determination

Based on the analysis, the project qualifies for a Negative Declaration under CEQA, as it does not result in significant environmental impacts requiring further mitigation. The combination of SCE's renewable energy supply, the generator's compliance with AQMD standards, and the operator's energy efficiency measures ensures minimal environmental impact.

Key Findings

- Energy usage is consistent with industry standards for cannabis cultivation.
- Emissions and noise levels are within regulatory limits, with effective mitigation measures in place.
- The project does not strain SCE's grid capacity or other utility systems.
- Cumulative impacts are minimal due to the reduced scope of operations (9 of 24 buildings).

Recommendations

The study recommends approval of the project, as it complies with CEQA, DCC, AQMD, and local regulations. The operator should continue to engage with SCE and AQMD to explore opportunities for further reducing energy use and emissions, such as transitioning to a fully grid-based power supply when infrastructure upgrades are complete.

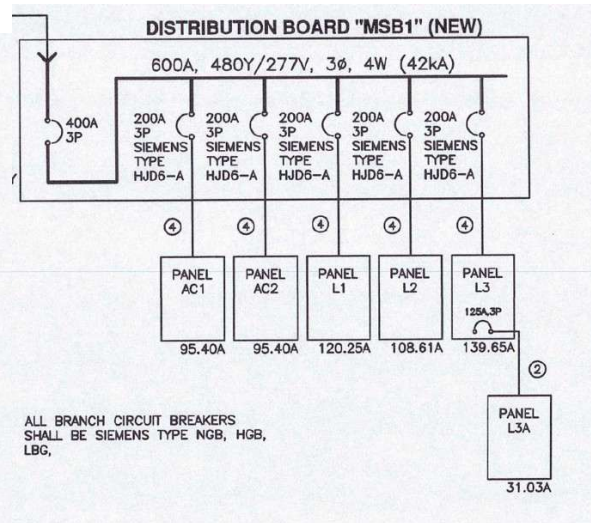
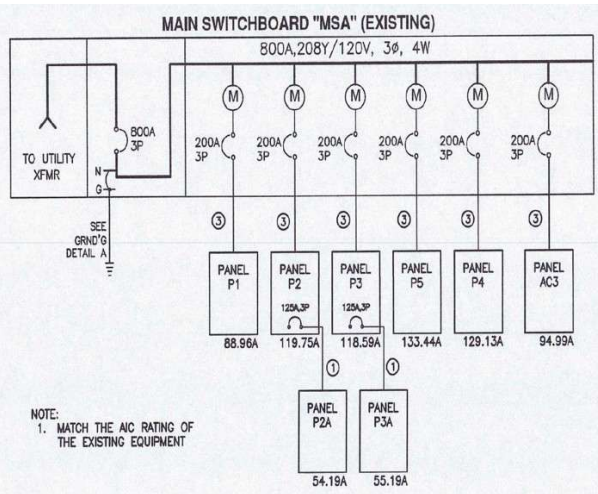
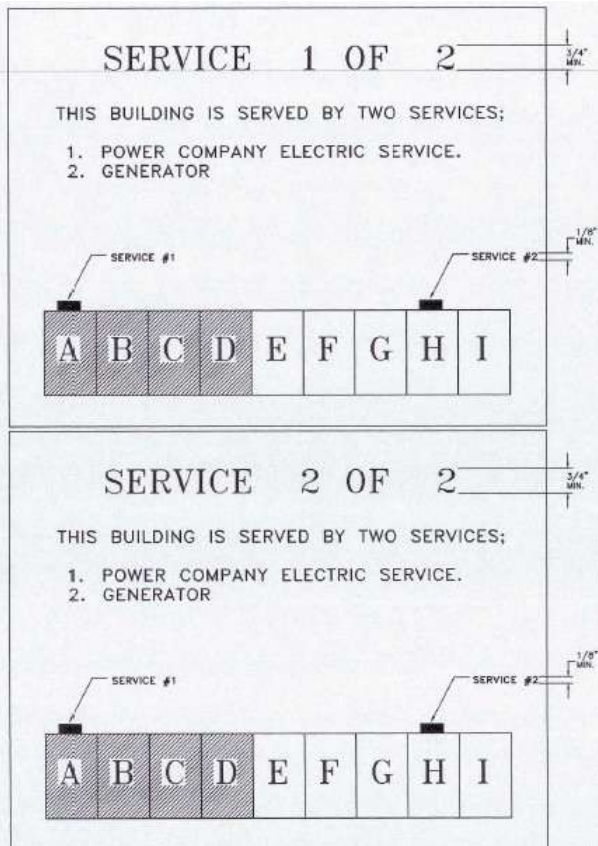
7. Appendices

- **Maps and Diagrams:** Site plans showing Building 9's location, electrical infrastructure layout, and generator placement within the complex.
- **Electrical Specifications:** Service Breakdown and panel schedule
- **Generator Certification of Compliance:** Manufacturers Certifications

Grow Organic Site Plan / Location



Electrical Services



Electrical Distribution

MSA						
ROOM		VOLTS 208Y/120V 3P 4W			A/C EXISTING	
MOUNTING FLOOR		BUS AMPS 80C			MAIN BKR MLO	
FED FROM UTILITY		NEUTRAL 100%			LUGS STANDARD	
NOTE						
CKT #	BREAKER TRIP/POLES	CIRCUIT DESCRIPTION	LOAD KVA			FEEDER RACEWAY AND CONDUCTORS
			A	B	C	
1	200/3	PANEL P1	10.85	10.74	9.89	2" C, 3#3/0CU, #3/0CU N, #6CU G
2	200/3	PANEL P2	17.31	12.94	14.18	2" C, 3#3/0CU, #3/0CU N, #6CU G
3	200/3	PANEL P3	15.46	14.75	13.88	2" C, 3#3/0CU, #3/0CU N, #6CU G
4	200/3	PANEL P4	14.78	12.33	15.31	2" C, 3#3/0CU, #3/0CU N, #6CU G
5	200/3	PANEL P5	10.65	15.33	15.32	2" C, 3#3/0CU, #3/0CU N, #6CU G
6	200/3	PANEL AC3	10.90	10.90	10.90	2" C, 3#3/0CU, #3/0CU N, #6CU G
TOTAL CONNECTED KVA BY PHASE			78.95	76.99	79.45	
		CONN KVA	CALC KVA		CONN KVA	CALC KVA
LIGHTING	2.54	3.18	(125%)	CONTINUOUS	38.11	47.64 (125%)
LARGEST MOTOR	6.14	7.68	(125%)	HEATING	0.00	0.00 (N/A)
OTHER MOTORS	137.90	137.90	(100%)	COOLING	0.00	0.00 (N/A)
RECEPTACLES	51.70	30.85	(59%>10)	NONCONTINUOUS	0.00	0.00 (100%)
KITCHEN EQUIP	0.00	0.00	(N/A)	DIVERSE	0.00	0.00 (N/A)
				METERED DEMAND	0.00	0.00 (125%)
					TOTAL KVA	236.39
					BALANCED 3-PHASE AMPS	630.74

MSB1						
ROOM		VOLTS 480Y/277V 3P 4W			A/C 42,000	
MOUNTING FLOOR		BUS AMPS 600			MAIN BKR MLO	
FED FROM TSI		NEUTRAL 100%			LUGS STANDARD	
NOTE						
CKT #	BREAKER TRIP/POLES	CIRCUIT DESCRIPTION	LOAD KVA			FEEDER RACEWAY AND CONDUCTORS
			A	B	C	
1	200/3	PANEL AC1	25.85	25.85	25.85	2-1/2" C, 3#250kcmilAL, #250kcmilAL N, #4AL G
2	200/3	PANEL AC2	25.85	25.85	25.85	2-1/2" C, 3#250kcmilAL, #250kcmilAL N, #4AL G
3	200/3	PANEL L1	28.38	28.38	23.22	2-1/2" C, 3#250kcmilAL, #250kcmilAL N, #4AL G
4	200/3	PANEL L2	25.80	25.80	20.64	2-1/2" C, 3#250kcmilAL, #250kcmilAL N, #4AL G
5	200/3	PANEL L3	33.54	33.54	25.80	2-1/2" C, 3#250kcmilAL, #250kcmilAL N, #4AL G
6	-/3	SPACE	0.00	0.00	0.00	
7	-/3	SPACE	0.00	0.00	0.00	
TOTAL CONNECTED KVA BY PHASE			139.42	139.42	121.36	
		CONN KVA	CALC KVA		CONN KVA	CALC KVA
LIGHTING	245.10	306.38	(125%)	CONTINUOUS	0.00	0.00 (125%)
LARGEST MOTOR	7.05	8.81	(125%)	HEATING	0.00	0.00 (N/A)
OTHER MOTORS	148.05	148.05	(100%)	COOLING	0.00	0.00 (N/A)
RECEPTACLES	0.00	0.00	(50%>10)	NONCONTINUOUS	0.00	0.00 (100%)
KITCHEN EQUIP	0.00	0.00	(N/A)	DIVERSE	0.00	0.00 (N/A)
				METERED DEMAND	0.00	0.00 (125%)
					TOTAL KVA	400.20
					BALANCED 3-PHASE AMPS	657.19

Generator Certificates of Compliance

CERTIFICATE OF COMPLIANCE

Certificate Number 20190503-AU2687
Report Reference AU2687-20100604
Issue Date 2019-MAY-03

Issued to: CAPSTONE TURBINE CORP
16640 STAGG ST
VAN NUYS CA 91406-1830

This certificate confirms that representative samples of

ENGINE GENERATORS

Stationary Engine Generator Assemblies, MicroTurbine Generators, Models C1000, 800, 600, 500, 400 series, may be followed by C, R or S may be followed by F, H or P, may be followed by G or D, may be followed by 4, may be followed by B, or H, may be followed by E, H, or U, may be followed by O, G, L, N or C may be followed by O, U or X.

Have been investigated by UL in accordance with the Standard(s) indicated on this Certificate.

Standard(s) for Safety: UL 2200, Stationary Engine Generator Assemblies
C22.2 No. 100-14, Motors and Generators
C22.2 No. 14-13, Industrial Control Equipment

Additional Information: See the UL Online Certifications Directory at <https://iq.ulprospector.com> for additional information.

This Certificate of Compliance does not provide authorization to apply the UL Mark. Only the UL Follow-Up Services Procedure provides authorization to apply the UL Mark.

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CERTIFICATE OF COMPLIANCE

Certificate Number 20190503-AU5040
Report Reference AU5040-20150430
Issue Date 2019-MAY-03

Issued to: CAPSTONE TURBINE CORP
18640 STAGG ST
VAN NUYS CA 91406-1633

**This certificate confirms that
representative samples of**

ENGINE GENERATORS FUELED BY WELLHEAD,
BIOGAS OR RAW NATURAL GAS; STATIC INVERTERS,
CONVERTERS AND ACCESSORIES FOR USE IN
INDEPENDENT POWER SYSTEMS

ENGINE GENERATORS FUELED BY BIOGAS OR RAW
NATURAL GAS, MicroTurbine Generators, Models 1000,
800, 600, 500, 400 series, may be followed by R or S, may
be followed by A, B or S, may be followed by G or D, may
be followed by 4, may be followed by B, H, or Z may be
followed by U, may be followed by 0, T or C may be
followed by 0 or X.

Have been investigated by UL in accordance with the
Standard(s) indicated on this Certificate.

Standard(s) for Safety: UL 2200, Stationary Engine Generator Assemblies
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**State of California
AIR RESOURCES BOARD**

Executive Order DG-049

**Distributed Generation Certification of
Capstone Turbine Corporation
C200S Natural Gas CARB Microturbine**

WHEREAS, the Air Resources Board (ARB) was given the authority under California Health and Safety Code section 41514.9 to establish a statewide Distributed Generation (DG) Certification Program to certify electrical generation technologies that are exempt from the permit requirements of air pollution control or air quality management districts;

WHEREAS, this DG Certification does not constitute an air pollution permit or eliminate the responsibility of the end user to comply with all federal, state, and local laws, rules, and regulations;

WHEREAS, on June 6, 2011, Capstone Energy Corporation applied for a DG Certification of its 200 kW C200 ICHP Microturbine and whose application was deemed complete on September 1, 2011;

WHEREAS, on February 20, 2018, Capstone Energy Corporation applied for a DG Recertification of its 200 kW C200 ICHP Microturbine renamed to C200S Natural Gas CARB Microturbine and whose application was deemed complete on March 21, 2018;

WHEREAS, the C200S Natural Gas CARB Microturbine is manufactured and sold with integrated combined heat and power technology;

WHEREAS, Capstone Turbine Corporation has demonstrated that the C200S Natural Gas CARB Microturbine complies with the minimum efficiency requirement in title 17, California Code of Regulations (CCR), section 94203(b);

WHEREAS, title 17, CCR, section 94203(b) allows for an energy credit at the rate of one megawatt-hour for each 3.4 million British thermal units of heat recovered to be used when calculating emission rates;

WHEREAS, Capstone Turbine Corporation has demonstrated, according to test methods specified in title 17, CCR, section 94207, that its natural-gas-fueled C200S Natural Gas CARB Microturbine has complied with the following emission standards:

1. Emissions of oxides of nitrogen no greater than 0.07 pounds per megawatt-hour;

2. Emissions of carbon monoxide no greater than 0.10 pounds per megawatt-hour; and
3. Emissions of volatile organic compounds no greater than 0.02 pounds per megawatt-hour.

WHEREAS, Capstone Turbine Corporation has demonstrated that its C200S Natural Gas CARB Microturbine complies with the emission durability requirements in title 17, CCR, section 94203(d);

WHEREAS, I find that the Applicant, Capstone Turbine Corporation, has met the requirements specified in article 3, title 17, CCR, and has satisfactorily demonstrated that the C200S Natural Gas CARB Microturbine meets the DG Certification Regulation 2007 Fossil Fuel Emission Standards;

NOW, THEREFORE, IT IS HEREBY ORDERED, that a DG Recertification, Executive Order DG-048 is granted.

This DG Certification:

- 1) Is subject to all conditions and requirements of CARB's DG Certification Program, article 3, title 17, CCR, including the provisions relating to inspection, denial, suspension, and revocation.
- 2) Shall be void if any manufacturer's modification results in an increase in emissions or changes the efficiency or operating conditions of a model, such that the model no longer meets the DG Certification Regulation 2007 Fossil Fuel Emission Standards.
- 3) Shall expire on the 22nd day of June, 2023.

Executed at Sacramento, California, this 22nd day of June, 2018.

/s/

Floyd V. Vergara, Esq., P.E.
Chief, Industrial Strategies Division