

8.0 ALTERNATIVES TO THE PROPOSED PROJECT

This section identifies and describes a reasonable range of potentially feasible alternatives to the proposed Project. The intent of an alternatives analysis is to determine if modifications to the proposed Project would help reduce or eliminate one or more of the significant environmental impacts identified in this EIR while still meeting most of the project objectives. This alternatives analysis evaluates both alternatives to the proposed General Plan and alternatives to BIG. As the proposed General Plan is a program-level document that does not include project-specific details, identifying alternatives to the proposed General Plan can be complex because the development of the General Plan is an iterative process. This means that as the General Plan is being developed many different land use patterns, roadway configurations, and policy frameworks are considered and rejected or modified along the way. Not all of the iterations address environmental impacts, rather they are necessary to ensure that the General Plan reflects the needs and goals of the City. In this section, alternatives to the proposed General Plan with the intent of reducing or eliminating environmental impacts identified in this EIR are evaluated.

8.1 INTRODUCTION

8.1.1 Purpose and Scope

Under CEQA, the identification and analysis of alternatives to a project are fundamental parts of the environmental review process. Public Resources Code (PRC) § 21002.1(a) establishes the need to address alternatives in an EIR by stating that in addition to determining a project's significant environmental impacts and indicating potential means of mitigating or avoiding those impacts, "the purpose of an environmental impact report is ... to identify alternatives to the project."

State CEQA Guidelines § 15126.6(a) provides further direction on the definition of project alternatives, as follows:

"An EIR shall describe a range of reasonable alternatives to the Project, or to the location of the Project, which would feasibly attain most of the basic objectives of the Project but would avoid or substantially lessen any of the significant effects of the Project and evaluate the comparative merits of the alternatives."

The State CEQA Guidelines require that the EIR include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the project. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative must be discussed, but these effects may be discussed in less detail than the significant effects of the project as proposed (State CEQA Guidelines § 15126.6(d)). The EIR is not required to consider every conceivable alternative to a project but is guided by a rule of reason. An EIR is not required to consider alternatives which are infeasible. CEQA Guidelines § 15126.6(a) states that the EIR must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. Key provisions of the State CEQA Guidelines on alternatives (§ 15126.6(a) through (f)) are summarized below to explain the foundation and legal requirements for the alternative's analysis in the EIR.

- “An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project.” (§ 15126.6(a))
- “The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency’s determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.” (§ 15126.6(c))
- “[T]he discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the Project, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly.” (§ 15126.6(b))
- “The specific alternative of ‘no project’ shall also be evaluated along with its impact” (§ 15126.6(e)(1))
- “The ‘no project’ analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation was published, at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” (§ 15126.6(e)(2))
- “The range of alternatives required in an EIR is governed by a ‘rule of reason’ that require an EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.” (§ 15126.6(f))
 - “Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)” (§ 15126.6(f)(1))
 - For alternative locations, “[o]nly locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.” (§ 15126.6(f)(2)(A))

- “An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative” (§ 15126.6(f)(3)).

Therefore, this analysis considers a No Project Alternative (**No Proposed General Plan/ 2015 General Plan Alternative** and **No BIG/No Annexation Alternative**) and identifies other alternatives that were considered but rejected as infeasible.

Because the Project is comprised of two primary components, the proposed General Plan and proposed development of BIG under the proposed General Plan, this EIR analyzes both the proposed General Plan’s impacts at a programmatic level of detail and, separately, BIG’s impacts at a project level of detail. Similarly, this EIR analyzes a range of alternatives both to the proposed General Plan and, separately, to BIG.

For each alternative, this analysis:

- Describes the alternative
- Analyzes the impact of the alternative as compared to the Project
- Identifies the Project impacts that the alternative would avoid or substantially lessen
- Assesses whether the alternative would meet most of the basic Project objectives
- Evaluates the comparative merits of the alternative and the Project

8.1.2 Proposed General Plan Objectives

As described in **Section 3.3: Project Objectives**, the following objectives have been established for the proposed General Plan and will aid decision-makers in their review of the Project, the Project alternatives, and associated environmental impacts.

- The addition of a substantial number of livable wage and head of household jobs that will strengthen the City’s economic base and fiscal resiliency and provide career pathways for the community.
- A larger amount and wider range of housing opportunities to address the needs of the community and military installations, demand from new households generated by job growth, and full spectrum of lifestyles and life stages.
- A cohesive land use plan that appropriately transitions between residential, commercial, and industrial areas, encourages new development to leverage and improve existing infrastructure, and provides expansion opportunities to support long term growth.
- Economic opportunities that allow residents and local businesses to (re)invest in the community and create generational wealth.
- Land use and circulation plans that capitalize on Barstow’s unique location, as a link in the national supply chain, and existing industrial and rail infrastructure to attract and retain innovative industrial and rail operators and to support the efficient movement of goods.

- Goals, policies, and implementation strategies that ensure Barstow is a healthy and safe community for residents, businesses, and visitors.

8.1.3 BIG Objectives

BIG's objectives are described below:

- Increase the speed and reliability, and lower the cost, of moving containerized goods from the San Pedro Bay Ports (Ports) to their end destinations, with the end effect of reducing traffic congestion and associated air emissions from trucking of goods to and from transload facilities, by constructing and operating a freight rail facility that comprises:
 - an intermodal freight rail yard (IMF) with a “closed loop” connection to an on-site transload warehouse center of sufficient capacity to attract large-scale users of warehouse facilities and justify their adoption of rail transport instead of long-distance, heavy-duty truck transport, and
 - a block swap yard at the same site as the IMF, to enable blocks of rail cars with the same destination to be combined into a single train, thereby increasing the efficiency of goods movement by rail;
- Optimize symbiotic facility site design that allows the most efficient interplay between the operations of the block swap, IMF and transload warehouse center to ensure that the site will accommodate projected future demand.
- Construct and operate the facility in a manner that promotes the public policy goals in the State Rail Plan to reduce the disproportionate impacts of truck-borne goods movement in urbanized and densely populated areas adjacent to Port facilities in southern California.
- Utilize a single technology platform to track goods throughout their journey from the Ports through the facility to their end destinations, thereby maintaining greater control, awareness, and visibility of goods movement through the supply chain.
- Design the facility so that its construction and operations do not interfere with or cause delays to existing operations on the mainlines.
- Locate the facility at a site that would:
 - be large enough for all BIG components (i.e., intermodal facility, transload warehouse center, block swap yard, additional laydown area, and additional tracks along BNSF's existing mainline);
 - be positioned along BNSF's existing mainline and near where the Cajon, Mojave, and Needles Subdivision main railroad lines converge (i.e., the “Subdivision Wye”);
 - be positioned near an existing locomotive maintenance facility, or with sufficient space for a new locomotive maintenance facility;
 - be positioned a reasonable distance from heavily urbanized areas (where land use incompatibilities can be minimized) yet near an existing employment base, freeways, and essential infrastructure;

- be relatively level and largely devoid of existing land uses and sensitive biological resources; and
- allow for sufficient on-site power generation to the rail yard (i.e., solar farm).

8.2 SUMMARY OF PROPOSED GENERAL PLAN IMPACTS

The proposed General Plan’s potential impacts, discussed in **Section 5.1** through **Section 5.17** of this EIR, are summarized below.

Proposed General Plan

8.2.1 Aesthetics

The proposed General Plan would allow changes to the potential development pattern include increasing density and intensity that would likely place buildings closer together and allow more housing per acre than currently exists in the City. There is the potential for projects, including infrastructure improvements to have significant changes to the visual character of the proposed General Plan area. Therefore, the visual change in the character of the proposed General Plan area is a significant unavoidable impact.

Despite compliance with the Barstow Code, compared to existing conditions, the amount of light that would be produced upon implementation of the proposed General Plan would substantially alter nighttime views. Therefore, impacts would be significant and unavoidable.

The proposed General Plan would result in less than significant impacts to adversely impacting scenic vistas and scenic resources within a State scenic highway.

8.2.2 Agriculture and Forestry Resources

While the majority of the proposed General Plan area is designated “Grazing Land” by the State of California, there are areas of the proposed General Plan area with land that is considered important agricultural by the State. Annexation and development of these lands would result in the conversion of agricultural land to urban uses. Even with incorporation of **Mitigation Measure (MM) GP AG-1**, development under the proposed General Plan could result in the loss of these important farmland types that would be permanent, and therefore, would be significant and unavoidable. The proposed General Plan would change the zoning designation of land that is currently zoned for agricultural use. As there are no feasible mitigation measures that can be applied to address the loss of agricultural resources, impacts would be significant and unavoidable. The proposed General Plan area does not include forestland or timberlands, and therefore, would not change the zoning of these lands nor convert such uses to other uses.

8.2.3 Air Quality

Development allowed under the proposed land use plan could contribute to an increase in frequency or severity of air quality violations and delay attainment of the ambient air quality standards (AAQS) or interim emission reductions in an air quality management plan (AQMP). Therefore, the proposed General Plan would conflict with the AQMP.

Construction-related regional air quality impacts of developments that would be accommodated by the proposed Project would be significant and unavoidable even with the implementation of **MM GP AQ-1**.

Application of State and Mojave Desert Air Quality Management District (MDAQMD) rules and regulations and implementation of the proposed General Plan goals, policies, and actions would reduce operation-related criteria air pollutants generated from energy, area, and mobile sources. Implementation of **MM GP AQ-1** and **MM GP AQ-2** would also contribute to reducing criteria air pollutants. Due to the magnitude of the overall land use development associated with the proposed General Plan, operational air quality impacts are considered significant and unavoidable.

Buildout of the proposed General Plan could expose sensitive receptors to substantial concentrations of toxic air contaminants (TACs). Even with Review of development projects by MDAQMD for permitted sources of air toxics (e.g., industrial facilities, dry cleaners, and gasoline dispensing facilities) implementation of the proposed General Plan would generate TACs that could contribute to elevated levels in the air basin. Though individual projects would achieve the project-level risk threshold of 10 per million, they would nonetheless contribute to the higher levels of cancer risk in the MDAB, and therefore result in a cumulatively considerable impact.

8.2.4 Biological Resources

Portions of the proposed General Plan area are undeveloped and could provide habitat for sensitive and special status plant and wildlife species. However, as concluded and identified in **Section 5.4: Biological Resources**, compliance with applicable regulations and implementation of the proposed General Plan policies would reduce impacts to biological resources to less than significant.

8.2.5 Cultural Resources

Future development under the proposed General Plan could result in impacts such as substantial changes to access, visibility, vibration, visual context, renovations, or modifications could alter or destroy the characteristics that make historic buildings significant. Avoidance of some historical and archaeological resources may not always be feasible, and requirements outlined in **MM GP CUL-1** through **MM GP CUL-4** in **Section 5.5: Cultural Resources** and the proposed General Plan policies may not be sufficient in reducing impacts to historical and archaeological resources to a less than significant level. As such, impacts to historical and archaeological resources as a result of implementation of the proposed General Plan would be significant and unavoidable.

Compliance with State law as well as **MM BIG CUL-8** would ensure that potential impacts to human remains are reduced to a less than significant level.

8.2.6 Energy

The proposed General Plan includes policies that would support energy conservation, renewable energy use, and increased energy efficiency. Regulatory compliance (e.g., Building Energy Efficiency Standards, California Green Building Code, Renewable Portfolio Standards Program, and California Corporate Average Fuel Economy standards) would increase building energy efficiency and vehicle fuel efficiency

and reduce building energy demand and transportation-related fuel usage. Implementation of the proposed General Plan would not result in wasteful or inefficient use of energy resources.

The proposed General Plan would also be consistent with relevant plans for renewable energy and energy efficiency, including California's Renewables Portfolio Standard program. Overall, energy impacts would be less than significant.

8.2.7 Geology, Soils, and Mineral Resources

Future development under the proposed General Plan would comply with applicable regulations, such as the California Building Code, to ensure that impacts due to seismic activities and other geologic features are reduced to a less than significant level. Paleontological resources have the potential to be discovered during construction activities that go beneath the ground surface, such as grading or trenching. Implementation of proposed General Plan Policy OSC-7.7, which protects paleontological resources by requiring new development to implement mitigation to avoid paleontological resources whenever possible or provide appropriate treatment of paleontological resources, would reduce impacts to paleontological resources under the proposed General Plan to a less than significant level.

The proposed General Plan area is in a region with moderate potential or possible location of aggregate resources which could be covered by new development. In most instances, the aggregate could not be extracted either because of the new development or because of surrounding development. However, as potentially valuable deposits of aggregate are located throughout the proposed General Plan area, and future development could reduce the ability to extract aggregates, there is no effective mitigation that could reduce this impact. Therefore, the loss of mineral resources of statewide and local significance is significant and unavoidable.

8.2.8 Greenhouse Gas Emissions

The proposed General Plan would increase greenhouse gas (GHG) emissions by 68,755 metric tons of carbon dioxide equivalence per year (MTCO₂e/yr) (30 percent) from existing levels. This increase would exceed MDAQMD's significance threshold of 90,718 MTCO₂e/yr and would not achieve the GHG reduction targets of Assembly Bill (AB) 1279. Implementation of **MM GP GHG-1** would ensure that the City prepares a Climate Action Plan (CAP) to achieve the State's carbon neutrality goal set by AB 1279. **MM GP GHG-1** would also ensure that the City is tracking and monitoring the City's GHG emissions. However, given the growth in population and employment within the City and SOI and the magnitude of emissions reductions needed to achieve the GHG reduction target, GHG emissions are considered significant and unavoidable.

8.2.9 Hazards, Hazardous Materials, and Wildfire

Buildout of the proposed General Plan would include construction activities and the operation of uses that would handle, store, or transport hazardous materials. Implementation of the proposed General Plan policies as well as compliance with local, State, and federal regulations, would ensure that impacts as a result of the use, storage, and transport of hazardous materials are reduced to less than significant levels. The proposed General Plan area is not within a State Responsible Area Very High Fire Hazard Severity Zone; therefore, no impact would occur. Most of the City is within a Local Responsible Area Moderate Fire Hazard Severity Zone and Non-Wildland/Non-Urban area. Compliance with applicable regulations such as

the California Fire Code as well as implementation of the proposed General Plan policies would reduce impacts to less than significant.

8.2.10 Hydrology and Water Quality

Development under the proposed General Plan would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater. During construction and operation, best management practices (BMPs) would be applied to future projects based on various local, State, and federal permits and through the environmental review process. The BMPs would be tailored to each project and are intended to reduce or eliminate stormwater runoff from a site such as dust, debris, or contaminants like spilled oil. Compliance with regulations, including BMPs, Barstow Code Chapter 15.14, Stormwater and Urban Runoff Pollution Control, Barstow Municipal National Pollutant Discharge Elimination System (NPDES) permit, and Stormwater Pollution Prevention Plan would reduce impacts to water quality by reducing erosion, runoff, and ensuring adequate design of drainage infrastructure.

Water supply for the Mojave Water Agency (MWA) service area is sourced almost entirely from pumped groundwater from the various basins, subbasins, and aquifers in the area, including the Mojave Basin Area. The Basin is an adjudicated system and is overseen by MWA. Since the Basin is adjudicated, it does not require a groundwater management plan pursuant to the Sustainable Groundwater Management Act. Impacts with respect to groundwater recharge groundwater supplies, and sustainable groundwater management plans are therefore considered less than significant.

Development within the proposed General Plan area would increase impervious surfaces. This could increase erosion or sedimentation in drainage swales and streams. However, standard erosion and wind control measures and BMPs would be implemented as part of project-specific Stormwater Pollution Prevention Programs (SWPPPs) to minimize the risk of erosion or sedimentation during construction. Water quality impacts as a result of inundation would be reduced upon implementation of the proposed General Plan policies and compliance with the Barstow Code. Overall, compliance with applicable federal, State, and local regulations would reduce water quality impacts to less than significant.

8.2.11 Land Use and Planning

Although the proposed General Plan would result in the construction of new roadways, none would physically divide an established community within the proposed General Plan area. The proposed General Plan would include policies designed to ensure that circulation improvements enhance connectivity without physically dividing an established community. Additionally, proposed SBLAFCO Actions A and B under the proposed General Plan are intended to allow for orderly development of the BIG area and other lands within and adjacent to the City of Barstow. No physical division of established community would occur with implementation of proposed SBLAFCO Actions A and B. Therefore, impacts would be less than significant.

The proposed General Plan would include SBLAFCO Actions A and B. SBLAFCO Action A, which totals 2,686-acres, includes a 2,676-acre portion of the BIG Specific Plan area and an additional 10 acres to prevent the creation of an unincorporated island. SBLAFCO Action B totals 99 acres. The City would prezone these

areas consistent with the proposed General Plan land use designations. Where the proposed land use designation is inconsistent with the existing land use, the existing land use would be allowed to continue as a pre-existing non-conforming use pursuant to Barstow Code § 19.00.060. This allows the use to continue in perpetuity, and can be sold, transferred, etc. Barstow Code Chapter 19.38: Non-Conforming Uses regulates expansion of a non-conforming use. The reorganizations (i.e., SBLAFCO Actions A and B) are proposed to allow for orderly development of the BIG Specific Plan area and other lands within and adjacent to the City of Barstow. No physical division of established community would occur with implementation SBLAFCO Actions A and B. Upon adoption of the proposed General Plan and proposed SBLAFCO Actions A and B, future development within these newly incorporated lands would be governed by the proposed General Plan policies and Barstow Code, including the proposed BIG Specific Plan.

The proposed General Plan is consistent with the goals of Connect SoCal 2024, SBLAFCO, the San Bernardino Countywide Plan, and zoning. Therefore, impacts would be less than significant.

8.2.12 Noise and Vibration

Construction of individual development projects associated with implementation of the proposed project would temporarily increase the ambient noise environment and would have the potential to affect noise-sensitive land uses in the vicinity of an individual project. Because construction activities associated with any individual development may occur near noise-sensitive receptors and depending on the project type, equipment list, time of day, phasing, and overall construction durations, noise disturbances may occur for prolonged periods of time or during the more sensitive evening/nighttime hours, construction noise impacts associated with implementation of the proposed General Plan is considered significant and unavoidable even with the implementation of **MM GP NOI-1**.

Stationary noise consisting of landscaping maintenance activities, back-up diesel generators, parking lot activity, maintenance activities, heating, ventilation, and air conditioning (HVAC) (residential and non-residential) and loading and unloading activities at commercial and industrial uses, would be considered less than significant with the implementation of proposed General Plan policies. These include Policy S-4.2, which calls for ensuring compliance with standards and procedures for mitigating stationary noise, and Policy S-4.3, which requires future developments of stationary noise sources to comply with standards for regulating noise levels. Policy S-4.4 would help to mitigate City impacts by prioritizing mitigation at the source, such as sound enclosures. Therefore, stationary noise impacts would be less than significant.

Development under the proposed General Plan would generate additional traffic, resulting in significant traffic noise increases (i.e., increases greater than 3 dBA in noise environments of 60 to 64 dBA CNEL) along several of the study roadway segments, including Main Street, Rimrock Road, Lenwood Road, L Street, Barstow Road, and Muriel Drive. While **MM GP NOI-2** would require future projects to consider traffic noise reduction measures, no individual measures are available to reduce project-generated traffic noise to less-than-significant levels in all cases. Therefore, traffic noise would be significant and unavoidable impact under the proposed General Plan.

Vibration generated by construction equipment and commercial/industrial operations has the potential to exceed the City's Strategy 2.B-2 vibration standard of 0.2 in/sec Peak Particle Velocity and the Federal

Transit Administration's criteria for architectural damage. Incorporation of **MM GP NOI-1** and **MM GP NOI-2** would reduce construction and operational vibration impacts, respectively, to a less than significant level.

8.2.13 Population and Housing

The proposed General Plan would allow for population and job growth directly through the update to the Land Use Plan that would facilitate construction of new homes and businesses, however, the new growth is not considered unplanned. Additionally, through advanced utility/resource/facility planning directed by the proposed General Plan policies, there is no potential for unplanned growth to occur indirectly through extension of infrastructure. Therefore, the proposed General Plan would result in a less than significant impact concerning substantial unplanned population growth either directly or indirectly.

The proposed General Plan would not result in the displacement of existing people or the reduction of housing that would necessitate the construction of replacement housing elsewhere. The proposed Land Use Map was prepared in part to ensure no net loss of overall housing capacity compared to the 2015 General Plan. Therefore, the proposed General Plan would not displace substantial numbers of existing people or housing and a less than significant impact would occur.

8.2.14 Public Services and Recreation

The proposed General Plan anticipates population and job growth through the implementation of a Land Use Plan that would provide for the construction of housing. Over time, the additional population and jobs would result in the demand for new or expanded public services facilities. Policies LU-2.5 and LU-2.6 in the proposed General Plan would require that new projects demonstrate a fiscally neutral or positive impact to the City. These policies address both the capital cost of new facilities and the on-going cost of operations. Impacts would be less than significant.

8.2.15 Transportation

The proposed General Plan policies would support multimodal access and safety as well as reduce vehicle miles traveled (VMT). While total VMT is expected to increase under the proposed General Plan compared to the 2015 General Plan, the VMT per service population is projected to decrease. However, this EIR has disclosed a significant and unavoidable VMT impact at the program level because the effectiveness of the proposed General Plan policies and strategies in reducing VMT cannot be guaranteed. Therefore, VMT impacts would be significant and unavoidable. The proposed General Plan would have less than significant impacts with regards to a geometric design feature and emergency access.

8.2.16 Tribal Cultural Resources

Future development under the proposed General Plan would include ground-disturbing activities in areas that may have currently unknown tribal cultural resources. Construction activities such as grading and excavation could inadvertently disturb/unearth previously unknown/unrecorded tribal cultural resources. Even with the implementation of mitigation measures drafted in consultation with tribes (**MM GP CUL-1** and **MM CUL-3**, and regulations designed to minimize impacts, there is a possibility that disturbing them

during construction could have a significant impact on the tribal cultural resource, resulting in significant and unavoidable impacts.

8.2.17 Utilities and Service Systems

Future development projects under the proposed General Plan would create additional demand for water and would generate additional wastewater, solid waste and stormwater runoff. BIG construction and operations would require relocation/construction of water, wastewater, and stormwater conveyance infrastructure and utility infrastructure. As analyzed throughout this Draft EIR, construction of these improvements may result in significant and unavoidable impacts concerning aesthetics, agriculture, air quality, cultural resources, geology and mineral resources, greenhouse gas emissions, noise and vibration, transportation, and tribal cultural resources.

8.3 PROPOSED GENERAL PLAN: SIGNIFICANT AND UNAVOIDABLE IMPACTS

The proposed General Plan's environmental effects pursuant to State CEQA Guidelines § 15126.2(a) are addressed in **Section 5.1** through **Section 5.17** of this EIR. Environmental impacts have been mitigated to the extent feasible with incorporation of the mitigation measures specified in **Sections 5.1** through **5.17**. However, certain impacts would remain significant despite mitigation, thus would result in a significant unavoidable environmental impacts. With implementation of the proposed General Plan, the following significant unavoidable impacts would occur.

8.3.1 Aesthetics

- **Impact 5.1-3: General Plan.** The proposed General Plan could allow for significant changes to the visual character in the plan area.
- **Impact 5.1-4: General Plan.** The proposed General Plan would allow development which would create a new source of substantial light which would adversely affect nighttime views in the area.

8.3.2 Agriculture and Forestry Resources

- **Impact 5.2-1: General Plan.** The proposed General Plan facilitates development which would result in the conversion of Farmland to non-agricultural uses and contribute to the loss of agricultural production in the proposed General Plan area.
- **Impact 5.2-2: General Plan.** The proposed General Plan would result in rezoning land designated agricultural to non-agricultural uses, and therefore, would conflict with existing zoning for agricultural uses.

8.3.3 Air Quality

- **Impact 5.3-1: General Plan.** The proposed General Plan would allow development which would conflict with the MDAQMD's AQMP.
- **Impact 5.3-2: General Plan.** Construction and operational activities of development permitted under the proposed General Plan would exceed the MDAQMD's air quality emissions thresholds and result in a net increase of criteria pollutants for which the Project region is in non-attainment under applicable federal or State AAQS.

- **Impact 5.3-3: General Plan.** Development facilitated by the proposed General Plan could expose sensitive receptors to substantial concentrations of TACs and result in the siting of new sources of TACs near existing or planned sensitive receptors.

8.3.4 Cultural Resources

- **Impact 5.5-1: General Plan.** Development facilitated by the proposed General Plan would result in significant unavoidable impacts to historic resources.
- **Impact 5.5-2: General Plan.** Development facilitated by the proposed General Plan would result in significant unavoidable impacts to archaeological resources.

8.3.5 Geology, Soils, and Mineral Resources

- **Impact 5.7-10: General Plan.** Development facilitated by the proposed General Plan would result in the loss of availability of known mineral resources that would be of economic value to region and State.
- **Impact 5.7-11: General Plan.** Development facilitated by the proposed General Plan would result in the loss of availability of locally-important mineral resources recovery sites delineated in a land use plan.

8.3.6 Greenhouse Gas Emissions

- **Impact 5.8-1: General Plan.** GHG emissions from development permitted under the proposed General Plan would exceed the long-term emissions reduction target of AB 1279, resulting in GHG emissions that would have a significant impact on the environment.
- **Impact 5.8-2: General Plan.** Development permitted by the proposed General Plan would conflict with California Air Resources Board (CARB) 2022 Scoping Plan strategies regarding farmland preservation.

8.3.7 Noise and Vibration

- **Impact 5.12-1: General Plan.** Due to the potential for proximity of construction activities to sensitive uses, the number of construction projects occurring simultaneously, and the potential duration of construction activities, construction noise from activities of development permitted under the proposed General Plan could result in a temporary substantial increase in noise levels above ambient conditions

8.3.8 Transportation

- **Impact 5.15-2: General Plan.** Development facilitated by the proposed General Plan would have significant and unavoidable impacts concerning VMT.

8.3.9 Tribal Cultural Resources

- **Impact 5.16-1: General Plan.** Development facilitated by the proposed General Plan could result in a substantial adverse change in the significance of a historical tribal cultural resource.

- **Impact 5.16-2: General Plan.** Development facilitated by the proposed General Plan could result in significant and unavoidable impacts to tribal cultural resources determined by the lead agency to be significant.

8.3.10 Utilities and Service Systems

- **Impact 5.17-1: General Plan,** development facilitated by the proposed General Plan would require relocation/construction of water, wastewater, and stormwater conveyance infrastructure and utility infrastructure. As concluded in **Sections 5.1** through **5.17**, certain impacts (i.e., concerning aesthetics, agriculture, air quality, cultural resources, geology and mineral resources, greenhouse gas emissions, noise and vibration, transportation, and tribal cultural resources) would remain significant despite mitigation, thus, would result in significant unavoidable environmental impacts. Therefore, proposed relocation/construction of new or expanded water, wastewater, stormwater drainage, electric power, natural gas, and telecommunications facilities under the proposed General Plan would result in a significant unavoidable impact.

8.4 SUMMARY OF BIG IMPACTS

BIG's impacts, discussed in **Section 5.1** through **Section 5.17** of this EIR, are summarized below.

Barstow International Gateway Project (BIG)

8.4.1 Aesthetics

Because BIG would substantially alter the site's character, replacing the desert landscape along Main Street with a rail yard and transload warehouse center, BIG would substantially degrade the site's visual character or quality of public views of the site and its surroundings, resulting in a significant unavoidable impact during both construction and operational phases.

Visual degradation would be caused by necessary nighttime lighting of features during BIG operations, including visually apparent barriers and signage and contrasting signal lighting. BIG would create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Despite incorporation of mitigation measures identified in **Section 5.1: Aesthetics**, which require the implementation of a Construction Lighting and Screening Plan, BIG both construction and operations would result in significant and unavoidable impacts concerning light and glare.

8.4.2 Agriculture and Forestry Resources

BIG would convert approximately 313 acres of Important Farmland (Agricultural Land) to non-agricultural use. A Land Evaluation and Site Assessment (LESA) was conducted and determined this conversion would be less than significant.

8.4.3 Air Quality

BIG would conflict with or obstruct implementation of the applicable air quality plan, result in a cumulatively considerable net increase of criteria pollutants for which the region is in nonattainment under an applicable federal or State AAQS, and expose sensitive receptors to pollutant concentrations

above applicable thresholds. Despite incorporation of mitigation identified in **Section 5.3: Air Quality**, BIG would result in significant and unavoidable impacts with regard to air quality planning, criteria pollutant emissions, and exposure of sensitive populations.

8.4.4 Biological Resources

BIG construction and operation could result in potentially significant impacts to special status species, riparian or sensitive natural communities, wetlands, and wildlife movement. With implementation of mitigation measures detail in **Section 5.4: Biological Resources**, potentially significant impacts would be reduced to a less than significant level.

8.4.5 Cultural Resources

As concluded in **Appendix 5.5 BIG-1: Cultural Resources Assessment**, 204 cultural resources were identified within the BIG footprint. Evaluations conducted for the 204 identified cultural resources determined that 19 prehistoric archaeological sites qualify as “historical resources” and “unique archaeological resources” under CEQA. Additionally, P-36-2910/Route 66/National Trails Highway is listed in the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR) and, as such, qualifies as a “historical resource” under CEQA. Therefore, BIG could cause a substantial adverse change in the significance of a cultural resource (i.e., historical resources and unique archaeological resources). Despite incorporation of mitigation identified in **Section 5.5: Cultural Resources**, because the likelihood that unidentified buried resources within the BIG footprint could be impacted as a result of BIG remains high, impacts to cultural resources would remain significant and unavoidable.

8.4.6 Energy

Although BIG would require substantial energy demand during construction and operations, however, through compliance with all applicable regulations and laws regarding sustainability and incorporation of mitigation measures identified in **Section 5.6: Energy**, BIG would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency and a less than significant impact would occur.

8.4.7 Geology, Soils, and Mineral Resources

Regarding paleontological resources, there are likely undocumented paleontological resources within the BIG footprint which could be disturbed during construction activities. However, with incorporation of mitigation identified in **Section 5.7: Geology, Soils, and Mineral Resources**, impacts would be less than significant.

Regarding mineral resources, there are known mineral resources of economic value to the region or residents of the State within the BIG footprint. However, there are no established current economic operations for concrete aggregate extraction and mining of land would result in additional costs due to other environmental impacts within the Mojave River channel. Furthermore, groundwater is relatively shallow in the area, thus, mining within the BIG footprint is infeasible. Therefore, BIG would not result in the loss of availability of a known mineral resource that would be of economic value to the region and the residents of the State. Additionally, BIG would not result in the loss of availability of locally-important

mineral resource recovery site delineated on a local general plan, specific plan, or land use plan, and a less than significant impact would occur.

8.4.8 Greenhouse Gas Emissions

BIG would have construction-related and operational impacts from GHG emissions, but overall would enhance regional goods movement efficiency and would reduce environmental impacts from regional truck and train traffic, in furtherance of the State Rail Plan. Construction would generate greenhouse gas emissions from equipment, vehicle trips, and rail activities, although these temporary impacts would be minimized through incorporation of mitigation measures identified in **Section 5.3: Air Quality**. After completion, operational emissions would occur from rail yard equipment, locomotives, a small number of heavy-duty trucks, and building energy use. However, BIG would reduce truck trips, resulting in reduced greenhouse gas emissions by enhancing rail transport efficiency, and would overall reduce greenhouse gas emissions. Further, through incorporation of mitigation identified in **Section 5.3: Air Quality** and **Section 5.6: Energy**, BIG would result in net reduced GHG emissions and impacts would be less than significant with air quality and energy mitigation incorporated. BIG would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs and impacts would be less than significant.

8.4.9 Hazards, Hazardous Materials, and Wildfire

BIG construction could result in temporary significant impacts regarding hazards to the public or environment from routine transport, use, or disposal of hazardous materials; however, impacts would be less than significant with incorporation mitigation identified in **Section 5.9: Hazards, Hazardous Materials, and Wildfire**.

BIG construction could create a potentially significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; however, potential impacts would be less than significant with incorporation of mitigation measures identified in **Section 5.3: Air Quality** and **Section 5.9: Hazards, Hazardous Materials, and Wildfire**.

BIG is located on a site which is included on a list of hazardous materials sites compiled pursuant to CGC § 65962.5. However, with incorporation of mitigation identified in **Section 5.9**, impacts would be less than significant.

BIG construction would temporarily impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; however, with incorporation of mitigation identified in **Section 5.9**, impacts would be less than significant.

8.4.10 Hydrology and Water Quality

BIG construction and operations would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality through the use of best management and low impact development practices.

Regarding groundwater recharge and supply, BIG would route stormwater runoff to on-site detention basins that would allow up to the 100-year storm events to infiltrate into the soils allowing the waters to recharge the aquifers. Additionally, BIG would not require water supplies greater than available in the Centro Subbasin. Therefore, no mitigation is required and a less than significant impact would occur.

BIG would be required to acquire and comply with a General Construction Stormwater Permit, which provides measures to reduce erosion and siltation from surface water runoff during BIG construction. BIG would be required to acquire and maintain an Industrial General Permit for vehicle maintenance operations, which would manage the polluted runoff from operational vehicle maintenance. Additionally, the BIG footprint is generally undeveloped and provides no stabilization for soils. BIG would generally improve the BIG footprint with xeriscaping and other stabilizing features to reduce erosion and runoff to the maximum extents possible.

BIG would alter the site's existing drainage pattern through addition of impervious surfaces, increasing surface run-off but would not result in on-site or off-site flooding since BIG would be designed and constructed to accommodate the 100-year storm events and storm flows would be directed into on-site detention basins. Additionally, the general existing drainage pattern, including flood flows, for the BIG footprint would be maintained during construction and operations. As a result, a less than significant impact would occur in all thresholds.

Furthermore, the BIG footprint is not located close enough to the ocean such that tsunami would be a risk, nor is it located adjacent to standing bodies of water such that seiche would be a concern. Lastly, BIG would not conflict or obstruct implementation of any planning documents pertaining to water quality or groundwater management.

8.4.11 Land Use and Planning

BIG would not physically divide an established community, as there are no established communities within the BIG Specific Plan area. BIG's proposed circulation system is either internal to BIG Specific Plan, or off the site and within existing rights-of-way. Off-site improvements, including the east lead tracks, are proposed within the existing Lenwood and Barstow communities, but the east lead tracks would be constructed immediately adjacent to the existing tracks. The west lead tracks would be constructed near the Hodge and Lenwood communities and would be aligned adjacent to the existing tracks. Because the new east and west lead tracks are adjacent to existing tracks, BIG would not divide an established community and a less than significant impact would occur.

BIG would be consistent with Connect SoCal 2024 goals by improving regional goods movement efficiency and reducing regional heavy-duty truck traffic. BIG off-site improvements on unincorporated lands that would remain within the County would not conflict with relevant CWP policies or County Code standards.

The proposed General Plan proposes the annexation of a 2,676-acre portion of the BIG Specific Plan area and an adjacent approximately 10-acre parcel outside of BIG's footprint to avoid the creation of an island. BIG is a component of the overall Project, which also includes the proposed General Plan, a land use planning document. Therefore, potential environmental impacts associated with annexation within the BIG Specific Plan area are accounted for within the City's proposed General Plan analysis of consistency

with SBLAFCO goals. BIG would not conflict with SBLAFCO goals adopted for the purpose of avoiding or mitigating an environmental effect.

8.4.12 Noise and Vibration

BIG would result in a significant and unavoidable impact concerning noise during 33 kV line construction due to temporary noise barrier infeasibility and nighttime construction noise despite incorporation of mitigation measures identified in **Section 5.12: Noise and Vibration**. BIG operational noise would also result in a significant and unavoidable impact, as long-term operational noise levels would exceed applicable exterior/interior noise standards and/or result in a substantial noise increase at nearby sensitive receptors.

8.4.13 Population and Housing

BIG would affect the City's population, housing and employment landscape. While BIG would remove approximately 108 dwelling units, the City's existing housing stock and planned growth under the updated General Plan are expected to absorb this impact without requiring replacement housing. BIG would also generate over 20,000 direct and indirect new jobs by 2048, which could lead to new households forming in Barstow. This growth is planned for in the City's long-term proposed General Plan. Infrastructure improvements—such as roads and utilities—would be sized specifically for BIG and are not expected to trigger additional development beyond the BIG site. Overall, BIG would increase employment and shift some housing patterns, but these changes are anticipated and managed within the City's growth strategy. Therefore, given population growth associated with BIG operations would not be unplanned, a less than significant impact would occur.

8.4.14 Public Services and Recreation

BIG would not result in substantial adverse physical impacts associated with the provision of, or need for, new or physically altered, police protection, school, or library facilities, the construction of which could cause significant environmental impacts, as BIG does not propose construction of such facilities. BIG would not result in substantial adverse physical impacts associated with the provision of, or need for, new or physically altered fire protection or police facilities. A less than significant impact would occur.

BIG does not propose housing; therefore, BIG would not result in population growth, which would result in an increased demand for parks or other recreational facilities, the provision of which could have an adverse and physical effect on the environment. Additionally, because BIG employees' use of existing facilities would be negligible, BIG's employees would not increase the use of existing recreational facilities such that the substantial deterioration would occur or be accelerated. Therefore, a less than significant impact would occur in this regard. BIG would not provide, expand, or physically alter any recreational facilities. Therefore, no impact would occur.

8.4.15 Transportation

BIG construction activities and operations would not conflict with a program, plan, ordinance, or policy addressing the circulation system, resulting in a less than significant impact. BIG operations would be consistent with State CEQA Guidelines § 15064.3(b), resulting in a less than significant impact. BIG

construction activities and operations would not substantially increase hazards due to a geometric design feature or incompatible uses, resulting in a less than significant impact. BIG construction activities and operations would not result in inadequate emergency access, resulting in a less than significant impact.

8.4.16 Tribal Cultural Resources

Impacts to tribal cultural resources that would occur as a result of BIG was assessed through consultation with Native American tribes, with support provided via the Cultural Resources Assessment discussed in **Section 5.5: Cultural Resources**. A total of 68 prehistoric cultural resources were identified within the BIG footprint, 19 of which are recommended eligible for listing in the CRHR/NRHP. The results of consultation indicate that all prehistoric archaeological resources, which include the 19 eligible resources, are tribal cultural resources. Additionally, BIG maintains a high sensitivity for previously unrecorded buried or surface-level tribal cultural resources to be impacted by construction activities. As such, despite compliance with the established regulatory framework and implementation of mitigation identified in **Section 5.5: Cultural Resources**, BIG would cause a substantial adverse change in the significance of a tribal cultural resource, and impacts would be significant and unavoidable.

8.4.17 Utilities and Service Systems

BIG construction and operations would require relocation and construction of new water, wastewater, and stormwater conveyance infrastructure and utility infrastructure, the impacts thereof would result in significant unavoidable impacts despite compliance with the established regulatory framework and implementation of the mitigation measures identified throughout this Draft EIR.

8.5 BIG: SIGNIFICANT AND UNAVOIDABLE IMPACTS

BIG's environmental effects pursuant to State CEQA Guidelines § 15126.2(a) are addressed in **Section 5.1** through **Section 5.17** of this EIR. Environmental impacts have been mitigated to the extent feasible with incorporation of the MM specified in **Sections 5.1** through **5.17**. However, certain impacts would remain significant despite mitigation, thus would result in significant unavoidable environmental impacts. With implementation of BIG, the following significant unavoidable impacts would occur:

8.5.1 Aesthetics

- **Impact 5.1-3: BIG**, concerning visual character or quality of public views in a non-urbanized area, would be significant and unavoidable. BIG would substantially alter the site's character, replacing the desert landscape along Main Street with an intermodal facility and block swap yard, BIG would substantially degrade the site's visual character resulting in a significant unavoidable impact during both construction and operational phases.
- **Impact 5.1-4: BIG**, concerning substantial light or glare impacts, would be significant and unavoidable. Because BIG would create a new source of substantial glare/light pollution that would adversely affect day or nighttime views in the area, a significant unavoidable impact would occur.

8.5.2 Air Quality

- **Impact 5.3-1: BIG**, concerning conflict with or obstruction of implementation of applicable air quality plan, would be significant and unavoidable. Because BIG would exceed MDAQMD's construction and operational emissions thresholds, BIG would conflict with or delay implementation of an applicable attainment or maintenance plan, BIG would result in a cumulatively considerable net increase of criteria pollutants for which the region is in nonattainment under an applicable federal or State AAQS, a significant and unavoidable impact would occur.
- **Impact 5.3-2: BIG**, concerning a cumulatively considerable net increase of any criteria pollutant for which the Project region is in nonattainment under an applicable federal or State AAQS, would be significant and unavoidable. Because BIG's construction and operations emissions would still exceed MDAQMD's thresholds despite the implementation of mitigation measures identified in **Section 5.3: Air Quality**, a significant and unavoidable impact would occur.
- **Impact 5.3-3: BIG**, concerning exposure of sensitive receptors to substantial pollutant concentrations, would be significant and unavoidable. Because BIG's construction emissions would still exceed the PM₁₀ and PM_{2.5} federal AAQS and BIG's construction and operations would exceed carcinogenic risk at the maximally exposed individual residential and worker receptors despite the implementation of mitigation identified in **Section 5.3: Air Quality**, a significant and unavoidable impact would occur.

8.5.3 Cultural Resources

- **Impact 5.5-1: BIG**, concerning a substantial adverse change in the significance of a historical resource pursuant to § 15064.5, would be significant and unavoidable. Due to the high likelihood of previously unidentified historical and unique archaeological resources to be impacted by ground-disturbing activities and physical impacts that may cause adverse effects to said resources, despite incorporation of mitigation identified in **Section 5.5: Cultural Resources**, a significant and unavoidable impact during construction would occur.
- **Impact 5.5-2: BIG**, concerning a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5, would be significant and unavoidable. Due to the high likelihood of previously unidentified historical and unique archaeological resources to be impacted by ground-disturbing activities and physical impacts that may cause adverse effects to said resources, despite incorporation of mitigation identified in **Section 5.5: Cultural Resources**, a significant and unavoidable impact during construction would occur.

8.5.4 Noise and Vibration

- **Impact 5.12-1: BIG**, concerning generation of a substantial temporary or permanent increase in ambient noise levels (i.e., compared to levels without BIG) in vicinity of BIG in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, would be significant and unavoidable. Because temporary noise barriers for construction of the 33 kV transmission line would be considered infeasible mitigation, a significant and unavoidable impact would occur during these activities. Because BIG's proposed nighttime construction would

exceed nighttime noise standards at nearby sensitive receptors despite implementation of mitigation identified in **Section 5.12: Noise and Vibration**, a significant and unavoidable impact would occur. Because BIG operational noise levels would exceed applicable exterior/interior noise standards and/or result in a substantial noise increase at nearby sensitive receptors despite implementation of mitigation identified in **Section 5.12**, a significant and unavoidable impact would occur.

8.5.5 Tribal Cultural Resources

- **Impact 5.16-1: BIG**, concerning a substantial adverse change in the significance of a tribal cultural resource listed or eligible for listing in the California Register or in a local register of historical resources as defined in PRC § 5020.1(k), would be significant and unavoidable. Due to the high likelihood of previously unidentified tribal cultural resources that are archaeological resources to be impacted by ground-disturbing activities, and given physical impacts may cause adverse effects to said resources despite incorporation of mitigation identified in **Section 5.5: Cultural Resources**, a significant and unavoidable impact during construction would occur.
- **Impact 5.16-2: BIG**, concerning a substantial adverse change in the significance of a tribal cultural resource determined by the lead agency in its discretion and supported by substantial evidence to be significant pursuant to criteria set forth in PRC § 5024.1(c) would be significant and unavoidable. Due to the high likelihood of previously unidentified tribal cultural resources that are archaeological resources to be impacted by ground-disturbing activities, and given physical impacts may cause adverse effects to said resources despite incorporation of mitigation identified in **Section 5.5**, a significant and unavoidable impact during construction would occur.

8.5.6 Utilities and Service Systems

- **Impact 5.17-1: BIG**, concerning requiring or resulting in the relocation or construction of new or expanded water, wastewater/wastewater treatment, stormwater facilities, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects, would be significant and unavoidable. As concluded in **Sections 5.1 through 5.17**, BIG's environmental effects would be reduced to less than significant through compliance with the established regulatory framework and implementation of the specified mitigation measures. However, certain impacts (i.e., concerning aesthetics, air quality, cultural resources, noise and vibration, tribal cultural resources) would remain significant despite the implementation of mitigation measures and would therefore result in significant unavoidable environmental impacts. Therefore, BIG's proposed relocation/construction of new or expanded water, wastewater, stormwater drainage, electric power, natural gas, and telecommunications facilities would result in a significant unavoidable impact.

8.6 CRITERIA FOR SELECTING ALTERNATIVES

State CEQA Guidelines § 15126.6(b) specifies that the discussion of alternatives shall focus on alternatives to a project, or its location, that can avoid or substantially lessen significant impacts of a project, even if the alternatives would impede to some degree the attainment of the project objectives or would be more costly. This alternatives analysis, therefore, focuses on project alternatives that could avoid or

substantially lessen the Project’s environmental impacts concerning the environmental issue areas listed in State CEQA Guidelines Appendix G.

State CEQA Guidelines § 15126.6(d) specifies that additional significant effects of the alternatives are discussed in less detail than the significant effects of the project as proposed. For each alternative, the analysis below describes the alternative, analyzes the impacts of the alternative as compared to the Project (i.e., the proposed General Plan or BIG, as applicable), identifies significant impacts of the Project that would be avoided or lessened by the alternative, assesses the alternative’s ability to meet most of the project objectives, and evaluates the comparative merits of the alternative and the Project. The following sections compare the alternatives’ environmental impacts to the Project’s (i.e., the proposed General Plan or BIG, as applicable) environmental impacts and evaluates each alternative’s ability to meet the project objectives.

The discussion of the no project alternative usually proceeds along one of two lines. When the project involves changes to an existing plan, policy, or ongoing operation, the no-project alternative should reflect continuation of the existing plan, policy, or operation (CEQA Guidelines § 15126.6(e)(3)(A)). On the other hand, if the project is not a land use or regulatory plan, for example, a development project on an identifiable property, the “no project” alternative should reflect whether failure to approve the project would preserve existing environmental conditions or instead would lead to other changes to the environment. (Guidelines §15126.6(e)(2).) If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this “no project” consequence should be discussed. In certain instances, the no project alternative means “no build” wherein the existing environmental setting is maintained. However, where failure to proceed with the project would not result in the preservation of existing environmental conditions, the analysis should identify the practical result of the project’s non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment.

Proposed General Plan

Alternatives to a general plan typically come in the form of alternative policies and/or land use changes that can reduce environmental impacts associated with implementation of the general plan. Like the rest of the proposed General Plan analysis throughout this EIR, the level of analysis for the alternatives is commensurate with the level of detail and specificity contained in the proposed General Plan. Therefore, unlike project-level alternatives that can describe how an alternative location, design, or phasing would alter conditions and impacts that are specific to a particular development project, General Plan-level alternatives generally describe the anticipated impacts of broad policy changes on the way all development within the scope of the proposed General Plan would occur.

For example, an alternative that allows increased density and land use flexibility in a community’s core could result in higher density development close to jobs and services, resulting in fewer vehicle trips. Impacts typically associated with vehicle travel (measured by vehicle miles traveled [VMT]) including regional criteria air pollutant and GHG emissions from mobile sources), are typically reduced as development becomes more compact. Meanwhile, a different alternative to a general plan could be to

incentivize development through master planned communities which would disperse development across a jurisdiction to reduce land use incompatibility. That alternative could result in lesser localized air quality impacts like exposure of sensitive receptors to toxic air contaminants but could also result in increased VMT because of longer driving distances between homes, jobs, and services.

As noted above, State CEQA Guidelines § 15126.6(c) lists three criteria to guide lead agencies in their selection of a range of reasonable alternatives. These include alternatives that:

1. Can avoid or substantially lessen one or more of the project's significant effects;
2. Can meet most of the basic project objectives; and
3. Are potentially feasible.

The following analysis uses these three guiding criteria when determining the viability of alternatives to the proposed General Plan. State CEQA Guidelines § 15126.6(a) also provides that the scope and nature of a project's alternatives adhere to the rule of reason. Therefore, an EIR need not consider every conceivable alternative to a project, such as those with an unlikely or speculative potential for implementation or alternatives that would result in effects that cannot be reasonably ascertained.

Barstow International Gateway

Consistent with CEQA's direction that an EIR should consider only alternatives that would implement most of the basic project objectives, the range of alternatives to BIG is properly limited to alternatives that would implement most objectives that relate to the location and type of site for which BIG is proposed. Based upon those objectives (see **Section 8.1.3**, above), the following site-selection criteria for limitation of alternatives to BIG were developed consistent with the BIG objectives, and were applied in formulation of the range of alternatives given detailed consideration in this EIR.

- Proximity to BNSF's mainline, particularly the Subdivision Wye, which connects the Mojave Subdivision to the Cajon Subdivision at Barstow;
- Located near BNSF's existing Barstow classification yard (enabling the site to use the existing classification's yards heavy maintenance capabilities such as the mechanical car, locomotive shop, and locomotive fueling platform, rather than needing to construct an additional heavy maintenance facility);
- Located at a reasonable distance from heavily urbanized areas (where land use incompatibilities can be minimized) yet near an existing employment base, freeways, and essential infrastructure (as constructing this infrastructure would add substantial cost);
- Sizing (BNSF 2024):
 - For the intermodal facility, a minimum size of 15,000 feet long by 1,750 feet wide (excluding lead tracks)
 - For the block swap yard, a minimum size of 22,500 feet long by 1,250 feet wide

- Relatively level (sites with substantial hills or valleys would need greater earthwork in order to achieve the required near-flat condition of a proposed rail facility);
- Relatively devoid of existing land uses (sites with greater existing land uses would require costlier demolition);
- Relatively devoid of biological resources (sites with greater quantities of biological resources would require costlier avoidance or mitigation); and
- Number of property owners and property ownership (a larger number of parcels to acquire would mean a lengthier and costlier acquisition phase).

Co-locating the intermodal facility and block swap yard into a single location presents the following benefits:

- **Shared track infrastructure:** both the intermodal facility and block swap yard would require at least two miles of lead tracks entering and exiting the facility in order to allow trains to accelerate or decelerate. Separating these two components would require each to have their own lead tracks, substantially increasing the footprint, environmental impacts to footprint-related resource areas, and costs.
- **Shared utility infrastructure:** Co-locating both components enables them to share utility improvements. Locating these components on separate sites would require each to have their own utility infrastructure, substantially increasing the footprint, environmental impacts to footprint-related resource areas, and costs.
- **Shared equipment:** Switcher locomotives can operate between the two components under BIG's design. If the two components are separated, switcher locomotives would either have to travel miles to the other component, reducing efficiency and increasing air quality and GHG emissions, or each component would require more switcher locomotives, increasing cost.
- **Reduced train travel time between facilities:** For containers that interact with both the intermodal facility and the block swap yard, these containers can be moved between the two components on site under BIG's design. However, if the components are separated, these containers would have to be attached to locomotives and taken miles to the other component, resulting in decreased efficiency, increasing air quality and GHG emissions.
- **Increased employee efficiency:** Employees such as service technicians, locomotive operators, and administrative positions can be shared by both components under BIG. Separating these two components would require these employees to travel back and forth between the two components, reducing efficiency and increasing air quality and GHG emissions.

Notwithstanding, alternatives were still considered that would separate these components in order to provide a complete analysis of the range of alternatives. As discussed in **Section 8.7**, alternatives that separated these two components were determined to be infeasible.

8.7 PROPOSED GENERAL PLAN ALTERNATIVES CONSIDERED BUT REJECTED

In accordance with State CEQA Guidelines § 15126.6(c), an EIR should identify any alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the State CEQA Guidelines, among the factors that may be used to eliminate alternatives from detailed consideration are the alternative’s failures to meet most of the basic project objectives, the alternative’s infeasibility, or the alternative’s inability to avoid significant environmental impacts.

Proposed General Plan

In accordance with State CEQA Guidelines § 15126.6, there were no alternatives suggested or rejected as infeasible during the Notice of Preparation (NOP) scoping process. The City has identified other potential alternatives to the proposed General Plan for analysis in the EIR.

The following alternatives have been considered by the City but are rejected for their failure to meet most project objectives, substantially reduce significant impacts, or are not feasible and therefore are not be analyzed further in this EIR.

- Reduced Residential Density Alternative
- Increased Residential Density Alternative

8.7.1 Reduced Residential Density Alternative

The aim of a “Reduced Residential Density Alternative” would be to limit the production of residential development within the City to reduce impacts associated with population growth. Such an alternative could be implemented through modifications to the proposed General Plan’s policies and land use plan, including reducing the allowable densities of residential land use designations or by targeting specific parcels that have been identified for residential buildout (primarily vacant or underutilized land) and reducing their allowable density, or changing them to a non-residential use.

Based on the 2021-2029 Housing Element (adopted November 4, 2024), Table E-3: Housing Capacity Identified, the City identified capacity for 1,895 new housing units in City based on planned/entitled development and the potential for development on vacant sites. Population estimates provided by the California Department of Finance show that the City has grown at an average annual rate of 0.37 percent since 1990. If this annual growth rate is projected from 2023 through 2048, approximately 831 new housing units would be added to the existing 9,623 housing units (Department of Finance [DOF], 2024). The 831 new units represents approximately 12.4 percent of the projected estimate of 6,724 units by 2048 (see **Table 3-5: Proposed General Plan – 2048 Projections** in **Section 3.0: Project Description**).

To realize the Reduced Residential Density Alternative, the City would need to revise the existing and proposed land use designations to remove existing housing potential from the Land Use Diagram. The State of California has adopted laws that limit what an agency can do to reduce the potential for housing. At a minimum, the City would need to provide for the Regional Housing Needs Allocation (RHNA) of 1,520 housing units as shown Table E-1: Regional Housing Needs Allocation, 2021-2029; of the 2021-2029 Housing Element. These redesignations required to remove housing potential would also require findings

pursuant to State affordable housing laws. Note that the ability to construct the 1,520 RHNA housing units is within the next eight-year period and would represent an annual growth rate of 1.85 percent which is considerably higher than the historic growth rate.

As the Reduced Residential Density Alternative includes BIG, it is reasonable to assume that there would be a demand for housing that is higher than the 33-year average. While some of the new growth would be accommodated as existing vacant homes are occupied, it is unlikely that the 835 homes (8.7 percent vacancy) would be adequate to meet the potential growth. The Southern California Association of Governments (SCAG) estimates that Barstow will grow to approximately 13,139 housing units by 2050, or approximately 3,516 more than the existing 9,623 (DOF, 2024), and roughly 52 percent of the proposed Project estimate. This would represent an annual growth rate of 1.16 percent.

Allowing for the two extra years of growth projection in the SCAG estimate, and for the probable reduction in the existing 8.5 percent vacancy rate, for the purposes of this alternatives analysis, it is assumed that the Reduced Residential Density Alternative would result in a 50 percent reduction in the projected 6,608 additional housing units to approximately 3,304 housing units by 2048 for this alternative.

The proposed General Plan would result in the buildout of 6,608 new housing units in the City by 2048. The Reduced Residential Density Alternative is therefore assumed to reduce the buildout of new housing units to 3,304 units by 2048. For the purposes of analysis under this alternative, it is also assumed that the BIG Specific Plan would continue to be implemented, resulting in the same job growth of approximately 5,373 direct employees associated with BIG and 5,538 net direct employees associated with other planned or induced projects (totaling 10,819 new jobs; see **Section 3.0: Project Description**.

Fewer homes as assumed in this alternative would result in less construction and fewer construction sites in general. With less construction, and by extension less equipment use, fewer construction employees, grading, etc., the development impacts of this alternative would reduce air quality and GHG emissions and noise impacts when compared to the proposed General Plan. Fewer homes would also use less land resulting in a reduction of physical impacts in the environmental topic areas of biological resources, cultural and tribal cultural resources, paleontological resources, hydrology and water quality as less land would be graded, paved and developed. Fewer homes would also result in fewer residents resulting in a less demand of public services and utilities when compared to the proposed General Plan.

The Reduced Residential Density Alternative's restriction on housing growth could increase the pressure to develop elsewhere in the region, which would not eliminate the environmental impacts disclosed in this EIR, but rather relocate them outside the proposed General Plan area into the unincorporated areas of the County, or into neighboring jurisdictions.

Assuming that approximately 35 percent of the projected employment growth of 10,820 employees associated with BIG and other planned or induced projects, approximately 3,787 employees, would live in the City. The necessary amount of new housing to serve these employees could be as high as 3,787 units, assuming each housing unit only contains one person employed in Barstow. The necessary amount of new housing could be as low as 2,170 units, assuming a jobs-to-housing balance of 1.5:1 and a reduction in the citywide vacancy rate from 8.7 percent to 5 percent (2,525 housing units less 354 currently vacant

housing units that would be occupied). Reducing overall capacity to 3,309 units would potentially be enough or slightly below the amount of housing that could be needed to serve future employment growth.

If the Reduced Residential Density Alternative did not provide sufficient housing to meet the projected need, it is reasonable to assume that demand for housing would increase outside of the City and its sphere of influence. Unincorporated communities such as Helendale and Lenwood may not have the capacity to accommodate the projected growth and the nearest incorporated municipality to Barstow is the City of Victorville, approximately 30 miles southwest of Barstow. The need to meet the unmet housing demand outside the City would result in longer distances traveled by commuters into the City. This would increase vehicle miles travelled (VMT) when compared to a growth scenario that facilitates shorter commute distances by locating jobs and housing close together. This alternative would also largely conflict with the State and regional housing goals that encourage and mandate the availability of housing within jurisdictions. This includes the SCAG's Connect SoCal 2024 which includes several goals aimed around improving affordability and accessibility of housing in the southern California region.

While potentially feasible, the Reduced Residential Density Alternative requires a regulatory structure that does not currently exist, and which may be difficult to employ. As identified in the 2021-2029 Housing Element, the City's currently adopted land use plan contains a total development capacity on undeveloped land of between 15,140 and 19,266 housing units, representing land available for between 5,517 and 9,643 new housing units. To implement this alternative, the City would need to establish growth control policies in the General Plan and limit the issuance of building permits. The implementation of growth control policies would represent a change from housing conditions represented in the certified housing element and could be seen as a housing impediment by the State Department of Housing and Community Development, requiring a revision to the Housing Element and resubmittal for certification. It is likely that the RHNA, and other affordable housing projects, would need to be exempt from the housing restrictions.

Additionally, the proposed Land Use Map was prepared in part to ensure no net loss of overall housing capacity compared to the 2015 General Plan, in accordance with the no-net loss provisions in State law enacted initially through Senate Bill (SB) 330 (Skinner, 2019) and subsequently amended in 2021 through SB 8 (Skinner, 2021)—see § 66300 of the California Government Code. SB 8 extended the restrictions on the ability of jurisdictions to reduce housing capacity through January 1, 2030.

This alternative would not meet the proposed General Plan's objective to create a "larger amount and wider range of housing opportunities to address the needs of the community and military installations, demand from new households generated by job growth, and full spectrum of lifestyles and life stages" (see **Table 8-1: Comparison of Rejected Alternatives to Project Objectives – Proposed General Plan** later in this section). As a Reduced Residential Density Alternative would not meet a key Project objective, and would move environmental impacts outside of the City failing to avoid the environmental impacts of the proposed General Plan, this alternative was eliminated from further consideration in this EIR.

8.7.2 Increased Residential Density Alternative

An "Increased Residential Density Alternative" would increase the development of higher density neighborhoods in proximity to services, transit, and jobs with the expectation of reducing the need for personal vehicle use, thereby decreasing VMT. The use of less land for the same amount of housing would

reduce the need to convert agricultural land to urban uses, and reduce the need to annex land for housing development. Higher density development also uses less water per capita and reduces the amount of roadway and other infrastructure needed to serve the same population. A more compact urban form would also reduce impacts to geology and soils, as well as reduce biological and cultural impacts. More population within a smaller area may also encourage more services proximate to housing that would encourage walking and biking that would reduce VMT resulting in less impact to air quality and GHG emissions.

The Increased Residential Density Alternative could be implemented by redesignating residential parcels to a higher residential density designation, or redesignating non-residential parcels to a residential designation resulting in a higher maximum capacity for residential development in the City, or by implementing a policy requiring residential projects to develop at the maximum allowed density of their designation, which would ensure that land is used as efficiently as intended under the designations of the proposed General Plan.

The Increased Residential Density Alternative would meet the objectives of the proposed General Plan since it would result in similar outcomes for growth when compared to the proposed General Plan. However, even with the full development of BIG, the demand for housing within the City is not anticipated to exceed the residential capacity of the 2015 General Plan. Based on the 2021-2029 Housing Element (adopted October 12, 2021), Table 3: Realistic and Potential Development on Vacant Sites, the City estimated a potential for between 15,140 and 19,266 units on approximately 1,939 acres of vacant land based on current zoning. This represents an increase of between 5,517 and 9,643 housing units. The projected housing demand assumed for the proposed General Plan is 6,617 new housing units in the City by 2048. Therefore, while an Increased Density Alternative could reduce the demand to develop past the City limits, the proposed General Plan's increases in residential density would largely accomplish the same task. The proposed General Plan is intended to accommodate a range of housing types in the City which is Goal H-1: A diverse range of housing types that meets the City's housing needs of the Housing Element. In addition, SCAG has projected that roughly three quarters of Barstow's future housing need (as expressed in Table E-1 of the Regional Housing Needs Assessment) should be moderate income and above. Additionally, the stakeholder input suggested a priority for creating living-wage employment options/careers and the development of new housing options, particularly for higher end market rate housing to attract more skilled workers that provide critical services (e.g., medical professionals) (Appendix F: Stakeholder Engagement (F-4)). In the Barstow housing context, higher end, market-rate homes that are affordable to moderate and above moderate-income households equate to detached single-family homes.

A key change under the proposed General Plan Land Use Map is increased residential capacity South of Rimrock Road. Many parcels in this area currently designated Single Family Residential would be redesignated to Medium Family Residential under the proposed General Plan to accommodate greater growth in an area that has existing access to infrastructure and services. Facilitating similar increases in residential density in other areas of the City could alter the existing character of neighborhoods such as taller buildings, and areas where buildings are closer together. Substantially increasing density in some areas may require replacement and expansion of wastewater collection pipelines and the addition of new

water zones/storage to account for increased demand. This would involve trenching in streets and other construction impacts such as dust and noise that could result in serious disruption in existing neighborhoods.

The proposed General Plan’s residential density is intended to accommodate an increased population from new BIG employees. With the livable wage(s) paid to BIG employees it is reasonable to assume that a range of housing types would be ideal. This is a key objective of the proposed General Plan and would be more difficult to accomplish with this alternative. Further, even if the City develops a compact urban core, or even higher density neighborhoods, without significant investment in transit services for residents and employees, a personal vehicle would still be needed; thus, a significant reduction in VMT is unlikely.

While not a direct environmental impact, most of the neighborhoods in Barstow have single family homes with space between buildings leading to a more rural and open design. Increasing density usually results in buildings closer together, or taller than currently exist in most of Barstow. While this may be appropriate for the downtown core or select focus areas, it is not likely to be implemented citywide. The proposed General Plan already accounts for increased density in core areas making this alternative unnecessary. Therefore, while an Increased Residential Density Alternative is potentially feasible, and would meet the proposed General Plan’s objectives, it does not offer a significant change in development pattern from the proposed Project as analyzed in this EIR. Therefore the Increased Residential Density Alternative is eliminated from further analysis.

Summary

Table 8-1: Comparison of Rejected Alternatives to Project Objectives – Proposed General Plan compares the ability of the rejected alternative to meet the proposed General Plan’s project objectives. These alternatives were rejected because even though they could meet most of the proposed General Plan’s project objectives, the alternatives did not significantly reduce or eliminate the significant impacts identified in the EIR.

Table 8-1: Comparison of Rejected Alternatives to Project Objectives – Proposed General Plan	
Objective	
Objective 1. The addition of a substantial number of livable wage and head of household jobs that will strengthen the City’s economic base and fiscal resiliency and provide career pathways for the community.	
Reduced Residential Density	Meets Objective to a Lesser Extent. This alternative would continue to implement BIG, which would create livable wage jobs in the City, like the proposed General Plan. However, this alternative would limit the amount of available capacity for housing development in the City, which may disincentivize the development of other supporting commercial and industrial businesses in the City. While it is assumed that all new jobs under the proposed General Plan would also be generated under this alternative and that those employed in the City that cannot find housing would live in other areas of the region, this alternative’s reduction in housing capacity could have a negative effect on job growth in the City.
Increased Residential Density	Meets Objective. This alternative would allow the same level of economic development as the proposed General Plan, including the implementation of BIG.

Table 8-1: Comparison of Rejected Alternatives to Project Objectives – Proposed General Plan	
Objective	
Objective 2. A larger amount and wider range of housing opportunities to address the needs of the community and military installations, demand from new households generated by job growth, and full spectrum of lifestyles and life stages.	
Reduced Residential Density	Does Not Meet Objective. This alternative would limit the amount of housing that can be developed, subsequently resulting in less housing opportunities in the City. This alternative would not be able to meet the demand for housing in the City and encourage workers in the City to live in other areas of the region.
Increased Residential Density	Meets Objective. This alternative would target the provision of housing opportunities by implementing a land use plan that allows for more housing than under the proposed General Plan. It could also incentivize the development of more diverse housing types by removing restrictions on housing densities (i.e., a parcel designated for a single-family dwelling unit is up-zoned to a multi-family designation).
Objective 3. A cohesive land use plan that appropriately transitions between residential, commercial, and industrial areas, encourages new development to leverage and improve existing infrastructure, and provides expansion opportunities to support long term growth.	
Reduced Residential Density	Meets Objective to a Lesser Extent. This alternative would significantly reduce the available housing capacity in the City leading to less development. Allowing less housing capacity under the Land Use Plan could limit the City's opportunities to expand and support long-term growth. If the demand for housing in the City exceeds the City's reduced residential capacity under this alternative, new growth that would have occurred in the City may occur in neighboring areas.
Increased Residential Density	Meets Objective. This alternative would largely facilitate the same land use plan as proposed General Plan with the same transitions between land use areas.
Objective 4. Economic opportunities that allow residents and local businesses to (re)invest in the community and create generational wealth.	
Reduced Residential Density	Meets Objective to a Lesser Extent. This alternative would reduce the available housing capacity of the City, thereby potentially limiting the opportunities current and prospective residents would have to build new homes.
Increased Residential Density	Meets Objective. This alternative would potentially result in more high-density housing when compared to the proposed General Plan. It would not have any direct impacts concerning economic prosperity for residents.
Objective 5. Land use and circulation plans that capitalize on Barstow's unique location, as a link on the national supply chain, and existing industrial and rail infrastructure to attract and retain innovative industrial and rail operators and to support the efficient movement of goods.	
Reduced Residential Density	Meets Objective. This alternative would be like the proposed General Plan as it would result in no change the proposed circulation plans and allow for same level of industrial and rail development as the proposed General Plan.
Increased Residential Density	Meets Objective. This alternative does not propose any notable differences concerning industrial and rail development when compared to the proposed General Plan and would therefore meet this objective.

Table 8-1: Comparison of Rejected Alternatives to Project Objectives – Proposed General Plan	
Objective	
Objective 6. Goals, policies, and implementation strategies that ensure Barstow is a healthy and safe community for residents, businesses, and visitors.	
Reduced Residential Density	Meets Objective. This alternative would implement the same safety and health-related policies as the proposed General Plan.
Increased Residential Density	Meets Objective. This alternative would implement the same safety and health-related policies as the proposed General Plan.
Notes: 1. “Meets Objective to Lesser Extent” refers to a comparison between the alternative’s ability to meet the objective and the proposed General Plan’s ability to meet the objective.	

8.8 BIG ALTERNATIVES CONSIDERED BUT REJECTED

Barstow International Gateway Project (BIG)

As discussed above, an EIR should identify any alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. Among the factors that may be used to eliminate alternatives from detailed consideration are the alternative’s failures to meet most of the basic project objectives, the alternative’s infeasibility, or the alternative’s inability to avoid significant environmental impacts. Some of these alternatives were advanced to a conceptual design drawing to confirm if the design could meet key BIG objectives, while others were determined to be infeasible from an earlier point in the planning process and a design was never prepared. Where designs were prepared, they are included under the relevant alternative.

BIG considered six additional alternatives that were rejected as infeasible:

- Off-site Alternatives
- BIG Flipped Concept
- BIG Reduced Flipped Concept
- Block Swap Only
- Intermodal Facility/Transload Warehouse Center Only
- No On-site Warehouses

These alternatives and their reasons for being rejected as infeasible are described below.

8.8.1 Off-Site Alternatives

A suitable site for the BIG’s integrated facility must be on a sufficiently large area of level ground near the BNSF mainline, preferably in an area where the potential for adverse environmental and community impacts from construction and operations is relatively minimal. The BIG footprint, portions of which were previously obtained by BNSF as a strategic acquisition, with the remaining portions considered obtainable by BNSF, was selected for this purpose for several reasons.

First, the BIG footprint is located near the junction of the Cajon, Mojave, and Needles Subdivision mainlines, allowing it to efficiently serve trains from the east, west, and north.

Second, the site's location adjacent to the existing Barstow classification yard permits connectivity to the yard's mechanical car, locomotive shop, and locomotive fueling platform.

Third, the site was selected as likely resulting in minimal impacts to existing utilities.

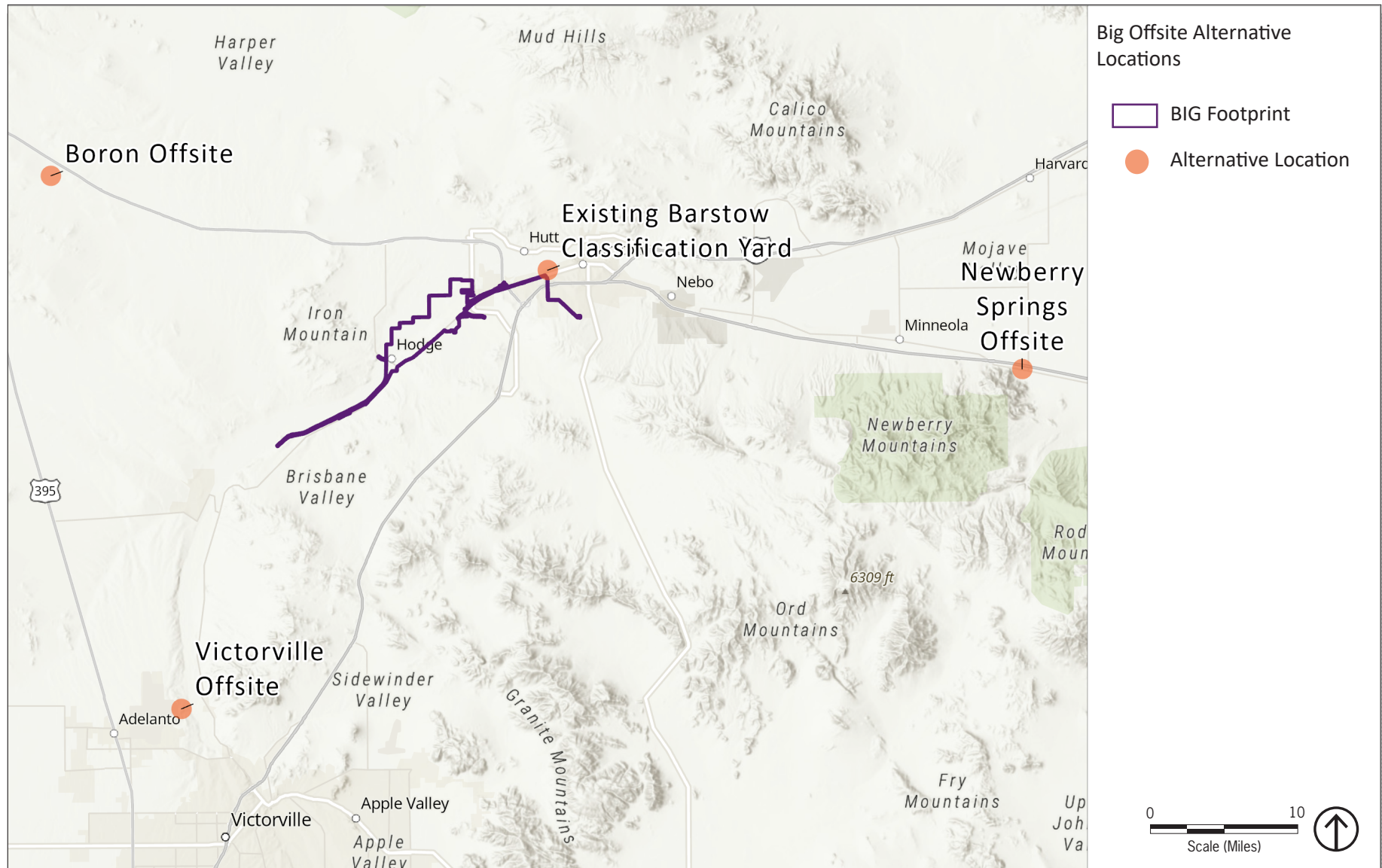
Fourth, because the BIG footprint is at the western end of the City (with more than half of the facility proposed for development on unincorporated and predominately undeveloped land within the County), minimal adverse community impacts would occur.

As discussed below with reference to candidate alternative sites, no other suitable locations exist near BNSF's rail network where an integrated facility can feasibly be built, due to disqualifying topographical constraints, the presence of sensitive environmental resources, or surrounding urban development. Nevertheless, four potential off-site alternatives were considered and rejected. The off-site alternatives are depicted in **Figure 8-1: BIG Off-Site Alternatives Locations**.

- **Boron.** BNSF considered a site west of SR-395 due to the large amount of connected vacant, undeveloped land. However, topographical constraints (elevation difference of greater than 120 feet across the site) would result in substantial additional grading. Furthermore, the Boron site is approximately 30 miles from the Cajon subdivision mainline, thus, trains to or from southern California would need to travel an additional 30 miles to and from the Boron site to be transloaded then route back to the Cajon subdivision. Due to this distance, it would not be operationally feasible to route trains from or destined to Southern California to this location. There is only a single mainline track from Barstow to Boron, thus, the approximately 30-mile segment from Barstow to Boron would need to be expanded to a double (or possible triple) track to handle the train counts under BIG, as well as adding additional staging tracks. These construction activities would require substantial additional costs and construction activities in this segment. The Boron site is also far removed from any population center; thus, it would be unlikely that sufficient employees could be found to operate the facility. Finally, given the distance between Boron and the existing Barstow classification yard, the Boron site would be unable to utilize the support functions of fueling, maintenance, crew, etc., requiring all these facilities and capabilities to also be built at the Boron site. For all these reasons, this off-site alternative was considered but rejected.
- **Victorville.** BNSF considered a site within or adjacent to the Southern California Logistics Airport. See **Figure 8-2: Victorville Off-Site Alternative** below. In a 2004 SCLA EIR, a 1,600-acre rail yard and multimodal industrial uses were analyzed within the northeast portion of the Southern California Logistics Airport ("Potential Area"). In the 2020 Southern California Logistics Airport Amendment EIR, the Potential Area removed the rail yard and multimodal industrial uses noting "market factors, demand, and economic conditions have changed substantially since that time" although rail uses remain permitted. The Potential Area is not connected to the existing mainline, which would require an approximately two-mile extension of lead tracks from the mainline and two new grade-separated crossings. Additionally, other uses have since developed within the

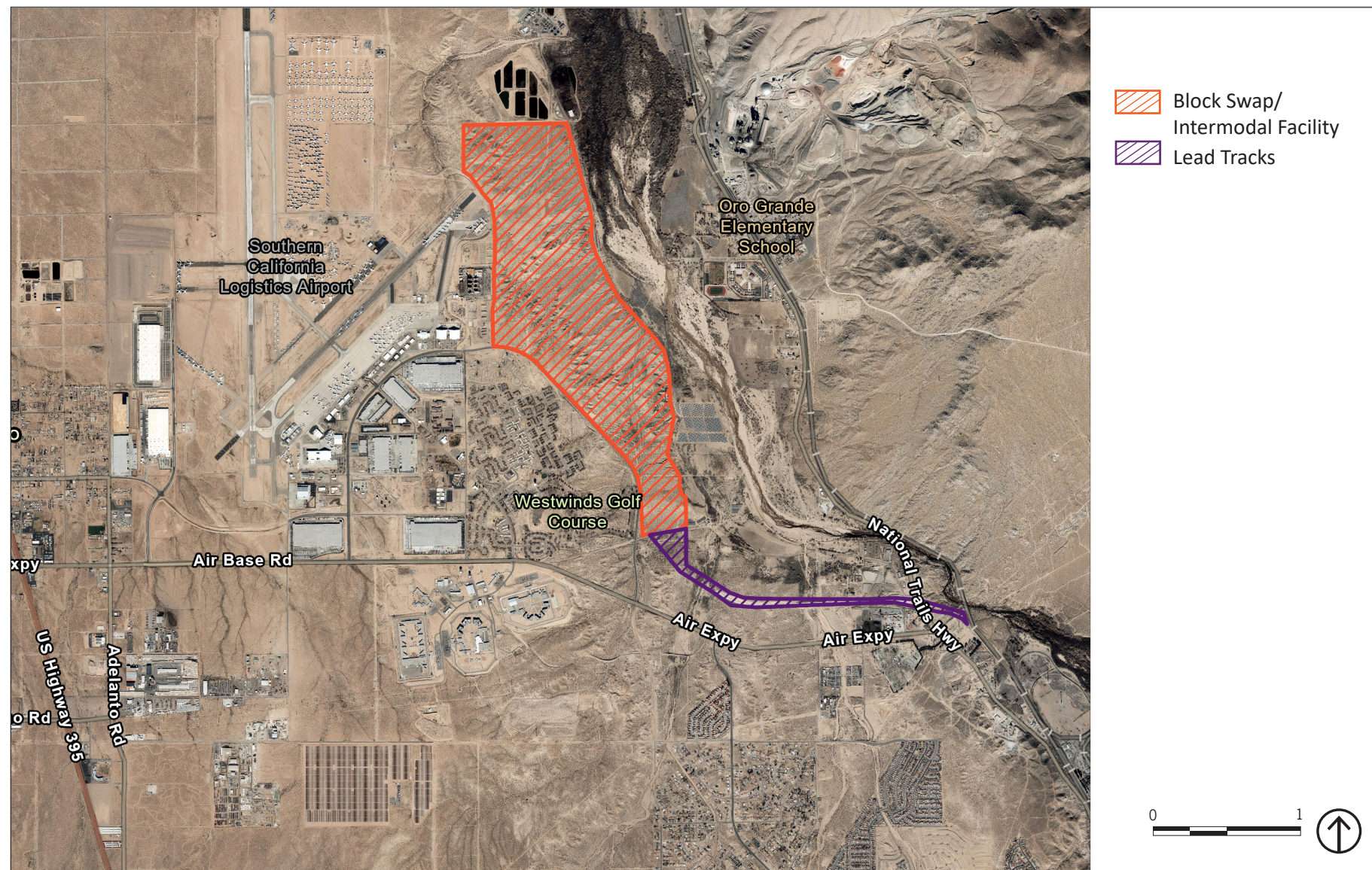
Potential Area including solar farms to the south and north, expansion of an existing wastewater treatment facility, and a substation. Accounting for the existing land uses that have since developed, the Potential Area now totals less than 800 acres. Redevelopment of existing land uses to expand the area is not economically feasible given the high cost of these utility facilities to demolish and replace. Additionally, the vast majority of the Potential Area is owned by the federal government, utility providers, or the Southern California Logistics Airport Authority (the entity which operates the airport). Therefore, acquisition of these parcels is speculative and unlikely. BIG's intermodal facility and block swap yard total approximately 1,200 acres, thus, any rail yard within the SCLA site would be less than half the size of the proposed BIG, resulting in proportionately less container volume. The Potential Area's size precludes any warehouse space, given all acreage would be needed for the railyard. Therefore, transload warehouses would have to be off the site under this alternative.

Additionally, trains from Northern California would need to travel an additional approximately 29 miles from the Barstow Subdivision Wye junction to the Victorville site, resulting in proportionately greater air quality and GHG emissions. Therefore, BNSF would not route NorCal trains to this location due to the additional travel distance from the mainline. The narrow space of the potential yard would substantially reduce the ability to provide a block swap yard with adequate number of tracks. Warehouse space within the SCLA is publicly owned by the Southern California Logistics Airport Authority, thus, electric hostlers taking containers to and from warehouses would need to be heavy-duty trucks rather than conventional hostlers. Due to the slopes within the available area, greater earthwork is anticipated under this alternative. Finally, given the distance between Victorville and the existing Barstow classification yard, the Victorville site would be unable to utilize the support functions of fueling, maintenance, crew, etc., requiring all these facilities and capabilities to also be built at the Victorville site. For all these reasons, this off-site alternative was considered but rejected.



Source:
County of San Bernardino, Y2023_PUA_Cache [aerial imagery], 2023.; Kimley-Horn, 2024.

Figure 8-1
BIG Off-site Alternatives Locations



Source:
County of San Bernardino, Y2023_PUA_Cache [aerial imagery], 2023.; Kimley-Horn, 2024.

Figure 8-2
Victorville Off-Site Alternative

- **Redevelop existing Barstow classification yard.** BNSF considered redeveloping the existing Barstow classification yard to accommodate an intermodal facility and block swap yard. The existing Barstow classification yard does not have any equipment to load or unload containers; thus, portions of the yard would need to be demolished and cranes and container parking areas established. A substantial number of tracks would need to be removed to allow for the container parking areas. Redevelopment of the existing Barstow classification yard would result in the classification yard no longer able to fulfill classification operations. Classification operations are integral to the success of BNSF network operations for efficiency; thus, this alternative would require the classification yard to be rebuilt in another location in southern California that could serve trains from northern California. Alternatively, instead of converting portions of the existing classification yard to a block swap yard or intermodal facility, the existing classification yard could be expanded to accommodate a block swap yard and intermodal facility. This would require substantial grading into the Mojave River. Existing bridges cross the yard which would either constrain crane operations or need to be demolished and rebuilt elsewhere. Furthermore, this would increase rail operations near more sensitive receptors than under BIG. For all these reasons, this off-site alternative was considered but rejected.
- **Newberry Springs.** BNSF considered a site in Newberry Springs, approximately 20 miles east of Barstow. The Newberry Springs site is far from any population center; thus, it would be unlikely that sufficient local employees could be found to operate the facility. Therefore, employees would be required to commute from the closest population centers (which would increase worker VMT) or relocate to Newberry Springs. Employee relocation to Newberry Springs would potentially result in unplanned population growth, which would be difficult to support without new public facility construction and major utility expansion. Further, substantial roadway improvements would be required within and surrounding the site given the lack of any notable transportation infrastructure. Additionally, given the distance between Newberry Springs and the existing Barstow classification yard, the Newberry Springs site would be unable to utilize the support functions of fueling, maintenance, crew, etc., requiring all these facilities and capabilities to also be built at the Newberry Springs site. Furthermore, there is no sufficient electricity supply in or near Newberry Springs, thus, electrical supply is speculative and would likely require substantial additional power infrastructure, such as solar development and battery storage to serve rail yard electrical demand for operations 24 hours per day. In addition, all other utility services would similarly require much greater utility construction compared to BIG. The additional utility construction would result in substantial additional expense. For all these reasons, this off-site alternative was considered but rejected.

As discussed above and summarized in **Table 8-2: BIG Off-Site Alternatives: Ability to Meet Project Objectives**, there are no any feasible off-site alternatives that would be of sufficient size, at a strategic available location and proximate to employment bases, and under control or potential control of BNSF. Therefore, the Off-Site Alternatives were considered but rejected.

Table 8-2: BIG Off-Site Alternatives: Ability to Meet Project Objectives

Objective	Existing Barstow Classification Yard	Victorville	Boron	Newberry Springs
Increase the speed and reliability, and lower the cost, of moving containerized goods from the San Pedro Bay Ports (“Ports”) to their end destinations, with the end effect of reducing traffic congestion and associated air emissions from trucking of goods to and from transload facilities, by constructing and operating a freight rail facility that comprises: - an intermodal freight rail yard (IMF) with a “closed loop” connection to an on-site transload warehouse center of sufficient capacity to attract large-scale users of warehouse facilities and justify their adoption of rail transport instead of long-distance, heavy-duty truck transport, and - a block swap yard at the same site as the IMF, to enable blocks of rail cars with the same destination to be combined into a single train, thereby increasing the efficiency of goods movement by rail;	Yes , given that under this alternative, an international gateway rail facility would be constructed and operated that would include these three components.	No , given the area within this alternative is only sufficient for the intermodal facility and block swap yard, thus, transload warehouses would have to be off of the site.	Yes , given that under this alternative, an international gateway rail facility would be constructed and operated that would include these three components.	Yes , given that under this alternative, an international gateway rail facility would be constructed and operated that would include these three components.
Optimize symbiotic facility site design that allows the most efficient interplay between the operations of the block swap, IMF and transload warehouse center to ensure that the site will accommodate projected future demand.	Yes , given that under this alternative, an international gateway rail facility would be constructed and operated that would include these three components.	No , given the area within this alternative is only sufficient for the intermodal facility and block swap yard, thus, transload warehouses would have to be off of the site.	Yes , given that under this alternative, an international gateway rail facility would be constructed and operated that would include these three components.	Yes , given that under this alternative, an international gateway rail facility would be constructed and operated that would include these three components.
Construct and operate the facility in a manner that promotes the public policy goals in the State Rail Plan to reduce the disproportionate impacts of truck-borne goods movement in urbanized and densely populated areas adjacent to Port facilities in southern California.	Yes , given under this alternative, an international gateway would be constructed and operated.	Yes , given under this alternative, an international gateway would be constructed and operated.	Yes , given under this alternative, an international gateway would be constructed and operated.	Yes , given under this alternative, an international gateway would be constructed and operated.

Table 8-2: BIG Off-Site Alternatives: Ability to Meet Project Objectives

Objective	Existing Barstow Classification Yard	Victorville	Boron	Newberry Springs
Utilize a single technology platform to track goods throughout their journey from the Ports through the facility to their end destinations, thereby maintaining greater control, awareness, and visibility of goods movement through the supply chain;	Yes , given under this alternative, an international gateway would be constructed and operated.	Yes , given under this alternative, an international gateway would be constructed and operated.	Yes , given under this alternative, an international gateway would be constructed and operated.	Yes , given under this alternative, an international gateway would be constructed and operated.
Design the facility so that its construction and operations do not interfere with or cause delays to existing operations on the mainlines.	No , given this alternative would be within a physically constrained area (existing Barstow railyard), thus, the construction would result in interruptions to the mainline operations.	Yes , although the additional length to this location would reduce overall mainline efficiency as trains would take longer to return to the mainline.	Yes , although the additional length to this location would reduce overall mainline efficiency as trains would take longer to return to the mainline.	Yes , although the additional length to this location would reduce overall mainline efficiency as trains would take longer to return to the mainline.
Locate the facility at a site that would:				
be large enough for all BIG components (i.e., intermodal facility, transload warehouse center, block swap yard, additional laydown area, and additional tracks along BNSF's existing mainline);	Yes , though it would require demolition of key facilities within the existing Barstow yard.	No , given spatial constraints.	Yes	Yes
be positioned along BNSF's existing mainline and near where the Cajon, Mojave, and Needles Subdivision mainlines converge (i.e., the "Subdivision Wye");	No , given this alternative would require substantial expansion into the Mojave River to construct all three components without replacing the existing Barstow classification yard.	No , given this alternative's location is approximately 29 miles from the Subdivision Wye, resulting in substantial additional travel for some trains that would use the rail facility.	No , given this alternative's location is approximately 29 miles from the Subdivision Wye, resulting in substantial additional travel for some trains that would use the rail facility. Further, this alternative's location would be substantially farther from a	No , given this alternative's site is not as level as the BIG site and would be substantially farther from a potential employment base.

Table 8-2: BIG Off-Site Alternatives: Ability to Meet Project Objectives

Objective	Existing Barstow Classification Yard	Victorville	Boron	Newberry Springs
			potential employment base.	
be positioned near an existing locomotive maintenance facility, or with sufficient space for a new locomotive maintenance facility;	Yes	No , approximately 30 miles from the Barstow locomotive maintenance facility, and insufficient space to accommodate a new locomotive maintenance facility.	Yes , though this alternative may require construction of a new locomotive maintenance facility, given the distance from the existing locomotive maintenance facility at Barstow.	Yes , though this alternative may require construction of a new locomotive maintenance facility, given the distance from the existing locomotive maintenance facility at Barstow.
be positioned a reasonable distance from heavily urbanized areas (where land use incompatibilities can be minimized) yet near an existing employment base, freeways, and essential infrastructure;	Yes , but to a lesser degree given this would be closer to residential uses.	Yes , proximate to industrial uses, vacate land, and utilities.	No , given this alternative is substantially further from existing employment bases, freeways, and essential infrastructure.	Yes , but to a lesser degree given this alternative would be further from existing employment bases.
be relatively level and largely devoid of existing land uses and sensitive biological resources;	No , given the existing Barstow yard is within the limits of this alternative.	Yes	Yes , but to a lesser degree given topographical constraints.	Yes
allow for sufficient on-site power generation to the rail yard (i.e., solar farm).	No , given already built out.	No , given spatial constraints.	Yes	Yes

8.8.2 BIG Flipped Concept Alternative

The BIG Flipped Concept Alternative would locate warehouse operations between the rail yard operations and Main Street in an attempt to increase the distance of the rail yard operations from sensitive receptors. **Figure 8-3: BIG Flipped Concept Alternative** depicts this configuration. Under this alternative, approximately 3.7 million square feet of BIG's approximately 4.4 million square feet of transload warehouses would be moved from the north to the south side of the rail yard, which would be flipped with the intermodal facility relocated northwest of the block swap yard. To accommodate 9.0 million square feet transload warehouse center despite spatial constraints from the Mojave River to the northwest, approximately 1.7 miles of Main Street would be relocated south to maintain similarly sized components as proposed under BIG. Given the spatial constraints from the Mojave River to the northwest, the footprint would extend south of Main Street in order to accommodate similarly sized components as BIG, requiring additional property acquisitions.

Under this alternative, the existing southern mainline tracks would be relocated to the north to maximize container parking/staging and accommodate the relocated transload warehouses, whereas BIG would maintain the mainline tracks in their existing location. Transload warehouses would be at elevation with Main Street, resulting in warehouses at ground-level within approximately 900 feet of residences. This alternative's configuration would require yard switching movements occurring between the Block Swap Yard and intermodal freight rail yard (IMF) to occupy the proposed mainlines, which in turn would prevent other trains from passing through. Therefore, under this alternative, trains only passing through BIG to other destinations would need to wait just outside of BIG for the main line to clear before passing through, thereby substantially increasing engine idling and emissions. Further, yard switching movements typically occur at 15 to 20 miles per hour (mph), while main line track speeds are 70 mph for freight trains and 80 mph for passenger trains. Therefore, this alternative's configuration would substantially slow the flow of train traffic along BNSF's existing Southern Transcontinental line from the Ports to the interior of the U.S., which is critical to the U.S. supply-chain, resulting in overall greater processing time (the time from container arrival to departure) of containers via BNSF's existing Southern Transcontinental line. This would conflict with one of BIG's objectives due to interfering with mainline operations.

Under BIG, the solar farm is proposed south of Main Street, adjacent to the rail yard. This proposed adjacency addresses the CPUC § 218 requirement that a party can only provide on-site solar-generated power to a single adjacent property that it owns or controls, or else the party is designated as a "public utility" or "electrical corporation." Because of the spatial arrangement under this alternative, the rail yard would not be adjacent to the solar farm and the transload warehouse center would be owned by a different entity. Therefore, construction of the solar farm under this alternative would not be possible unless the solar infrastructure were to extend approximately 3.0 miles from the solar farm to the rail yard. The additional infrastructure would mean the solar farm is not viable. However, this alternative would still include rooftop solar on the transload warehouse center.

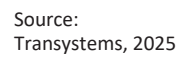


Figure 8-3
BIG Flipped Concept Alternative

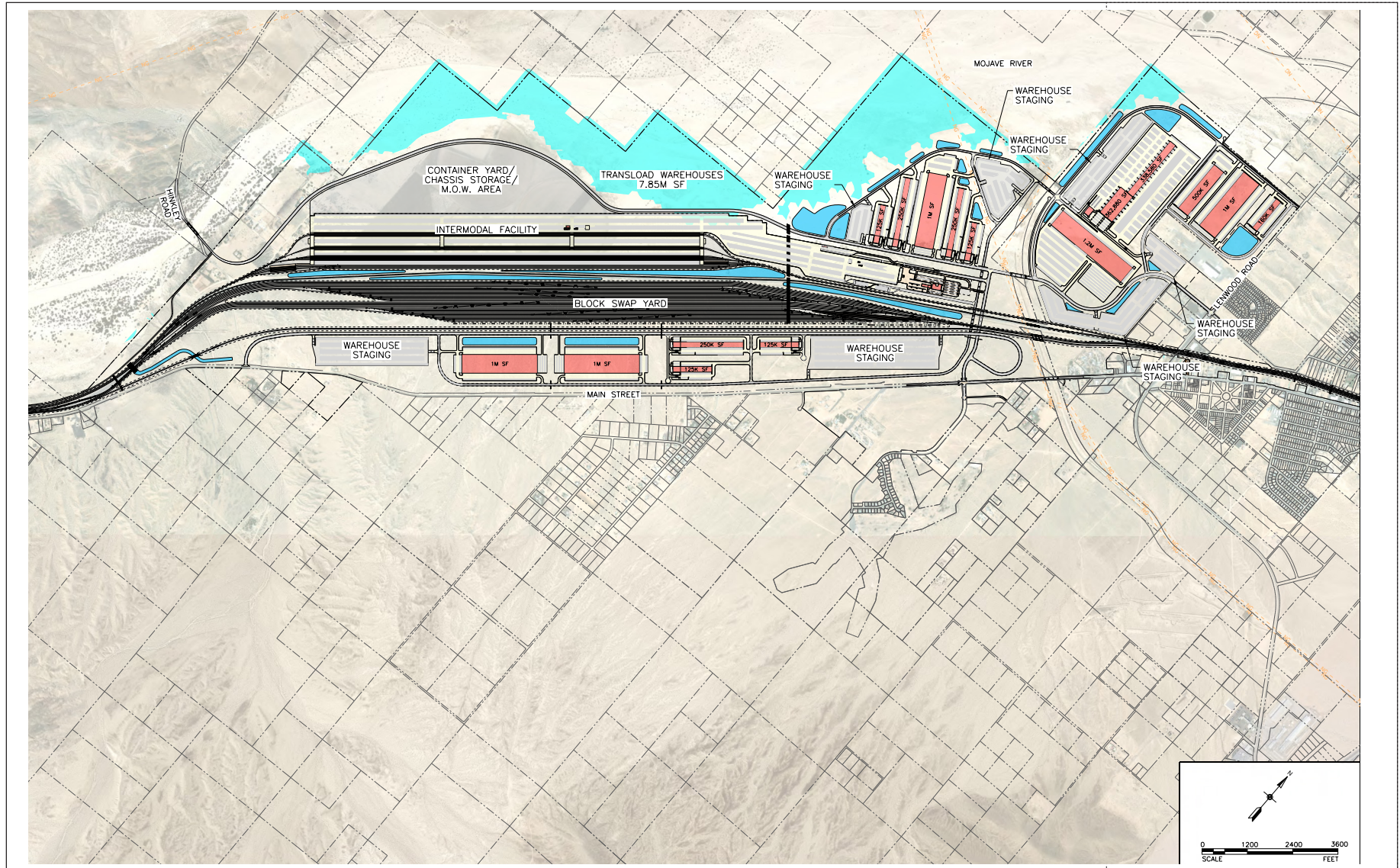
Off-site improvements would remain unchanged under this alternative, except for hydrology and drainage improvements, because impervious surfaces and flows would be different under this alternative compared to BIG. A drainage study has not been prepared for this alternative; however, this analysis assumes that while exact locations and sizing would be different, hydrology and drainage improvements would be in different arrangements but approximately greater volume. Under this alternative, vehicular access to the transload warehouse center would be provided directly from Main Street, as compared to Hinkley Road/Lenwood Road under BIG. Like BIG, vehicular access to the rail yard would be provided directly from Main Street, but it would occur approximately 3.0 miles further west, as compared to BIG. Under this alternative, approximately 1.7 miles of Main Street would be relocated south near the Hinkley Road bridge through an area identified as a wildlife movement area which has been identified as sensitive to desert tortoise.

Under this alternative, container parking would be located north of the intermodal facility, which would result in greater internal dray distances and durations as compared to BIG and would result in proportionately greater electric hostler electrical demand. Under this alternative, an intersection would be required to facilitate access between the north and south portions of the transload warehouse center. Electric hostlers would be required to share this intersection with any incidental heavy-duty trucks and employee traffic between the transload warehouse center and intermodal facility, resulting in potential conflicts and congested operations, reducing operational efficiency. Given these considerations, electric hostler operations would be impaired under this alternative and a greater number of electric hostlers, which would generate greater electric power demand, would be required.

This alternative's configuration would significantly disrupt the flow of train traffic along BNSF's existing Southern Transcontinental line from the Ports to the U.S. interior. This disruption would cause increased train idling and emissions outside of BIG, extend overall container processing times (the time from container arrival to departure) via BNSF's line, and reduce the speed and reliability of container transport by train. Consequently, this would likely elevate transportation costs, failing to meet most BIG project objectives. Therefore, this alternative was considered but rejected.

8.8.3 Reduced BIG Flipped Concept Alternative

Like the Big Flipped Concept Alternative, the Reduced BIG Flipped Concept Alternative would also locate warehouse operations between rail yard operations and Main Street in an attempt to increase the distance of the rail yard operations from sensitive receptors. Under this alternative, the block swap yard and intermodal facility would be flipped as depicted in **Figure 8-4: Reduced BIG Flipped Concept Alternative**. To accommodate the transload warehouse center despite spatial constraints from the Mojave River to the northwest, the transload warehouse center square footage under this alternative would total 8.0 million square feet, or approximately 11 percent less than BIG's proposed 9.0 million square feet. Under this alternative, transload warehouses would be at elevation with Main Street due to not having the space required for creating a vertical slope like as proposed under BIG or the Flipped Concept Alternative, resulting in warehouses at ground-level within approximately 900 feet of residences. Additionally, this alternative would provide less staging area within the rail yard and transload warehouse center due to the geometrical constraints of track layout.



Source:
Transystems, 2025

Figure 8-4
Reduced BIG Flipped Concept Alternative

To maximize container parking/staging despite the spatial constraints from the Mojave River, this alternative would relocate the existing mainline tracks to the north adjacent to the Mojave River boundary, whereas BIG would maintain the mainline tracks in their existing location. Relocating the mainline tracks results in an irregular trackage curvature which would add approximately 1,800 linear feet of mainline track compared to BIG. The additional trackage would result in longer train routes through the site. This alternative's configuration would require yard switching movements occurring between the block swap yard and intermodal facility to occupy the proposed mainlines, which in turn would prevent other trains from passing through. Therefore, under this alternative, trains passing through BIG to other destinations would need to wait outside of BIG for the main line to clear before passing through, thereby substantially increasing idling and emissions. Further, yard switching movements typically occur at 15 to 20 miles per hour (mph), while main line track speeds are 70 mph for freight trains and 80 mph for passenger trains. Therefore, this alternative's configuration would substantially slow the flow of train traffic along BNSF's existing Southern Transcontinental line from the Ports to the interior of the U.S., which is critical to the U.S. supply-chain, resulting in overall greater processing time (the time from container arrival to departure) of containers via BNSF's existing Southern Transcontinental line. This would conflict with one of BIG's objectives due to interfering with mainline operations.

Acquisitions would be similar under this alternative to BIG, except that the solar farm would not be constructed. Under BIG, the solar farm is proposed south of Main Street, adjacent to the rail yard. This proposed adjacency addresses CPUC § 218's requirement that a party can only provide on-site solar-generated power to a single adjacent property that it owns or controls, or else the party is designated as a "public utility" or "electrical corporation." Because of the spatial arrangement under this alternative, the rail yard would not be adjacent to the solar farm and the transload warehouse center would be owned by a different entity. Therefore, construction of the solar farm under this alternative would not be possible unless the solar infrastructure were to extend approximately 3.0 miles from the solar farm to the rail yard. The additional infrastructure would mean the solar farm is not viable. However, this alternative would still include rooftop solar on the transload warehouse center.

Off-site improvements would remain unchanged under this alternative, except for hydrology and drainage improvements, given impervious surfaces and flows would be different under this alternative compared to BIG. A drainage study has not been prepared for this alternative; however, this analysis assumes that while exact locations and sizing would be different, hydrology and drainage improvements would be in different arrangements but incrementally greater volume.

Under this alternative, vehicular access to the transload warehouse center would be provided directly from Main Street, as compared to Hinkley Road/Lenwood Road under BIG. Like BIG, vehicular access to the rail yard would be provided directly from Main Street, but it would occur approximately 3.0 miles further west, as compared to BIG.

Under this alternative, container parking would be located north of the intermodal facility, which would result in greater internal dray distances and durations compared to BIG, and would result in proportionately greater electric hostler electrical demand. Under this alternative, an intersection would be required to facilitate access between the north and south portions of the transload warehouse center. Electric hostlers would be required to share this intersection with any incidental heavy-duty trucks and

employee traffic between the transload warehouse center and intermodal facility, resulting in potential conflicts and congested operations, reducing operational efficiency. Given these considerations, electric hostler operations would be impaired under this alternative and a greater number of electric hostlers, which would generate greater electric power demand, would be required.

Under this alternative, construction would be approximately the same duration as under BIG but earthwork was estimated to total approximately 23 MCY, or approximately 12 percent less than BIG's estimated 26 MCY.

The configuration of this alternative would reduce the capacity of the transload warehouse center by approximately 11 percent and would significantly disrupt the flow of train traffic along BNSF's existing Southern Transcontinental line from the Ports to the U.S. interior. This disruption would cause increased train idling and emissions outside of BIG, extend overall container processing times (the time from container arrival to departure) via BNSF's line, and reduce the speed and reliability of container transport by train. Consequently, this would likely elevate transportation costs, failing to meet most BIG project objectives. Therefore, this alternative was considered but rejected.

8.8.4 Block Swap Only Alternative

Under this alternative, the block swap yard would be constructed in the same location as proposed under BIG, but the transload warehouse center and intermodal facility would not be built. BIG's proposed cross-dock intermodal operations would not occur as no intermodal facility or transload warehouse center would be built under this alternative to unload, transfer, repackage, and load containers. Under this alternative, the solar and 33kv distribution line components would not be constructed due to minimal electrical demand from the block swap yard.

Construction activities would be substantially less under this alternative, however, the portion between the existing mainlines and Main Street would still need to be graded to accommodate the near-level tracks. The cut would still be taken to the north side of the existing tracks and used as fill.

During operations, no heavy-duty trucks would enter the site as it would not include container loading or unloading. Furthermore, there would be very minimal employees associated with the block swap yard; thus, employee traffic would be substantially reduced under this alternative.

This alternative would not fulfill most BIG project objectives and therefore was considered but rejected.

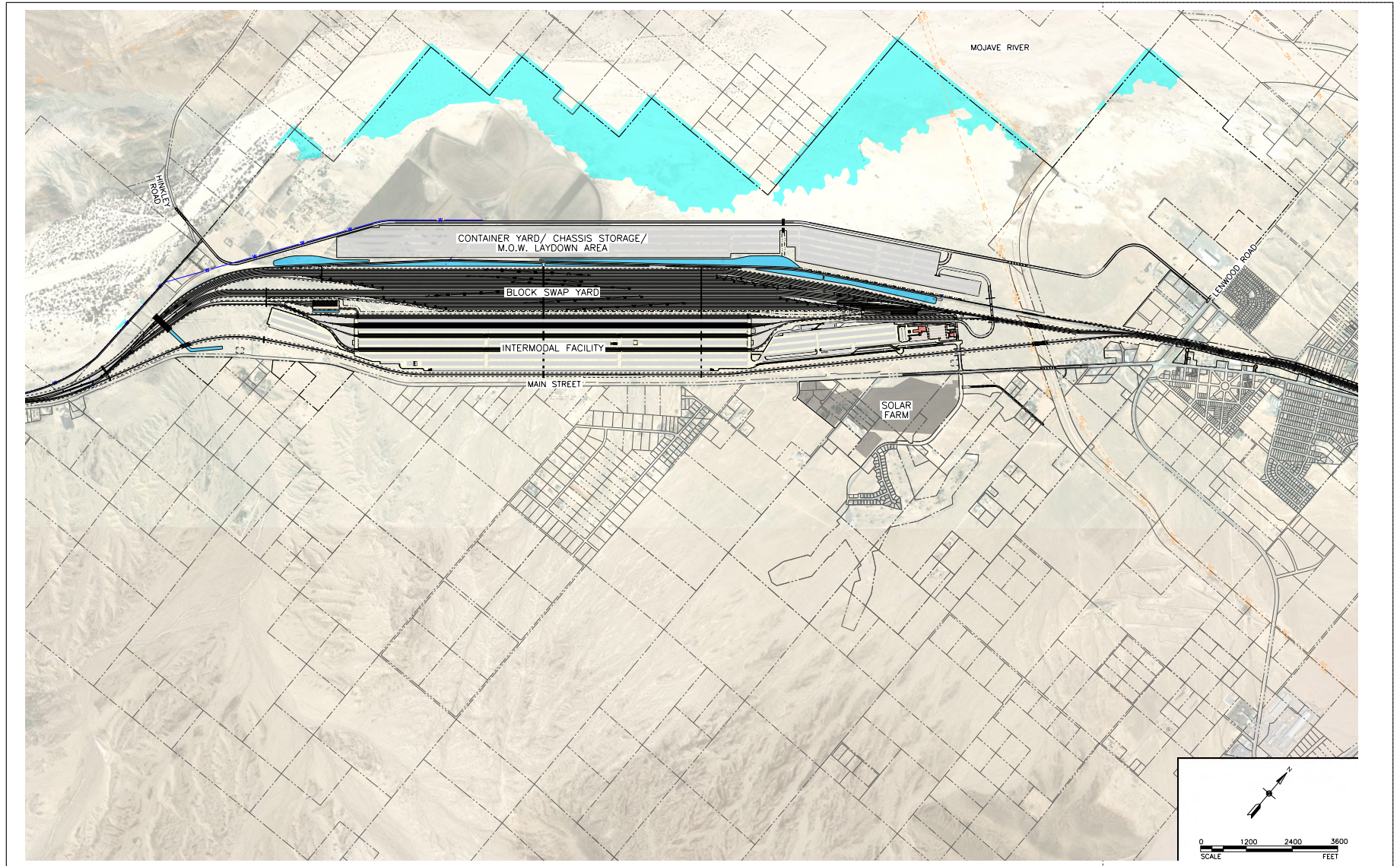
8.8.5 Intermodal Facility/Transload Warehouse Center Only Alternative

Under this alternative, the intermodal facility and transload warehouse center would be constructed in the same location as proposed under BIG, but the block swap yard would not be built. BIG's proposed cross-dock intermodal operations would occur under this alternative in the similar closed loop operation as BIG, however, the efficiency of combining blocks with other blocks that have similar destinations, leading to national supply-chain benefits and redundancy, would not occur under this alternative. This alternative would not fulfill most BIG project objectives and was therefore considered but rejected.

8.8.6 No On-Site Warehouses Alternative

Under this alternative, the intermodal facility and block swap yard would be constructed in the same location as proposed with BIG, but the transload warehouse center would be constructed in other High Desert locations (e.g., Victorville, Apple Valley, Adelanto, etc.) as depicted in **Figure 8-5: No On-Site Warehouses Alternative**. Cross-dock intermodal operations would still occur within the site; however, containers would be drayed to these off-site warehouse locations (approximately 25 miles of trucking between Victorville warehouses and BIG). Because the transload warehouses would be off the site, containers would be transported over public roadways using heavy-duty trucks rather than electric hostlers, as electric hostlers are not permitted to operate on public roadways. Containers being trucked from the Ports would be approximately 29 miles closer to warehouse locations in the High Desert under this alternative. However, this would not include the closed loop operations provided under BIG. Therefore, under this alternative, substantial heavy-duty trucking would occur between the proposed rail yard and off-site warehouses. Because of trucking costs, warehouse operators would be less likely to use these warehouses and it is unlikely that BIG would be able to attract sufficient customer volumes to be feasible. This alternative would not fulfill most BIG project objectives and was therefore considered but rejected.

As discussed above and summarized in **Table 8-3: BIG On-Site Alternatives Rejected for Inability to Meet Project Objectives**, there are no any feasible off-site alternatives that would be of sufficient size, at a strategic available location and proximate to employment bases, and under control or potential control of BNSF. Therefore, the Off-Site Alternatives were considered but rejected.



Source:
Transystems, 2023

Figure 8-5
No On-site Warehouse Alternative

Table 8-3: BIG On-Site Alternatives Rejected for Inability to Meet Project Objectives

Objective	BIG Flipped Concept	Reduced BIG Flipped Concept	Block Swap Only	Intermodal Facility/ Transload Warehouse Center Only	No On-Site Warehouses
Increase the speed and reliability, and lower the cost, of moving containerized goods from the San Pedro Bay Ports (“Ports”) to their end destinations, with the end effect of reducing traffic congestion and associated air emissions from trucking of goods to and from transload facilities, by constructing and operating a freight rail facility that comprises: an intermodal freight rail yard (IMF) with a “closed loop” connection to an on-site transload warehouse center of sufficient capacity to attract large-scale users of warehouse facilities and justify their adoption of rail transport instead of long-distance, heavy-duty truck transport, and a block swap yard at the same site as the IMF, to enable blocks of rail cars with the same destination to be combined into a single train, thereby increasing the efficiency of goods movement by rail;	No , given this alternative’s layout would cause main line train traffic delays, which in turn would result in increased train idling and emissions outside of BIG, extend overall container processing times (the time from container arrival to departure) via BNSF’s line, and reduce the speed and reliability of container transport by train, consequently likely elevating transportation costs.	No , given this alternative’s layout would cause main line train traffic delays, which in turn would result in increased train idling and emissions outside of BIG, extend overall container processing times (the time from container arrival to departure) via BNSF’s line, and reduce the speed and reliability of container transport by train, consequently likely elevating transportation costs.	No , given this alternative would not include an intermodal facility or transload warehouse center and it would not increase speed and reliability of the containers that would be processed under this mode under BIG given this alternative would not include the cross-dock intermodal operations.	No , given this alternative would not include a block swap yard and would not increase speed and reliability of the containers that would be processed by the block swap yard under BIG.	No , given this alternative would not include a transload warehouse center or a closed loop, which would increase time and costs for containers that would be trucked to and from off-site warehouses.

Table 8-3: BIG On-Site Alternatives Rejected for Inability to Meet Project Objectives

Objective	BIG Flipped Concept	Reduced BIG Flipped Concept	Block Swap Only	Intermodal Facility/ Transload Warehouse Center Only	No On-Site Warehouses
Optimize symbiotic facility site design that allows the most efficient interplay between the operations of the block swap, IMF and transload warehouse center to ensure that the site will accommodate projected future demand.	No , given this alternative's layout would cause mainline train traffic delays, which in turn would result in increased train idling and emissions outside of BIG, extend overall container processing times (the time from container arrival to departure) via BNSF's line, and reduce the speed and reliability of container transport by train, consequently likely elevating transportation costs.	No , given this alternative's layout would cause mainline train traffic delays, which in turn would result in increased train idling and emissions outside of BIG, extend overall container processing times (the time from container arrival to departure) via BNSF's line, and reduce the speed and reliability of container transport by train, consequently likely elevating transportation costs.	No , given this alternative would not include an intermodal facility or transload warehouse center and cross-dock intermodal operations would not occur.	No , given this alternative would not include a block swap yard.	No , given this alternative would not include a transload warehouse center or a closed loop.
Construct and operate the facility in a manner that promotes the public policy goals in the State Rail Plan to reduce the disproportionate impacts of truck-borne goods movement in urbanized and densely populated areas adjacent to Port facilities in southern California.	No , given this alternative's layout would cause delays in mainline train traffic, leading to increased train idling and emissions outside of BIG. This would extend the overall container processing times (from arrival to departure) on BNSF's line, reduce the speed and reliability of container transport by	No , given this alternative's layout would cause delays in mainline train traffic, leading to increased train idling and emissions outside of BIG. This would extend the overall container processing times (from arrival to departure) on BNSF's line, reduce the speed and reliability of container transport by	No , given this alternative would not include an intermodal facility or transload warehouse center and cross-dock intermodal operations would not occur, which in turn would diminish BIG's competitiveness against truck-borne goods movement.	No , given this alternative would not include a block swap yard, which in turn would diminish BIG's competitiveness against truck-borne goods movement.	No , given this alternative would not include a transload warehouse center or a closed loop, which in turn would diminish BIG's competitiveness against truck-

Table 8-3: BIG On-Site Alternatives Rejected for Inability to Meet Project Objectives

Objective	BIG Flipped Concept	Reduced BIG Flipped Concept	Block Swap Only	Intermodal Facility/ Transload Warehouse Center Only	No On-Site Warehouses
	train, likely elevate transportation costs, and diminish BIG's competitiveness against truck-borne goods movement.	train, likely elevate transportation costs, and diminish BIG's competitiveness against truck-borne goods movement.			borne goods movement.
Utilize a single technology platform to track goods throughout their journey from the Ports through the facility to their end destinations, thereby maintaining greater control, awareness, and visibility of goods movement through the supply chain;	Yes	Yes	Yes	Yes	Yes
Design the facility so that its construction and operations do not interfere with or cause delays to existing operations on the mainlines.	No , given this alternative would require relocation of the existing mainline and operations would cause mainline train traffic delays.	No , given this alternative would require relocation of the existing mainline and operations would cause mainline train traffic delays.	Yes	Yes	Yes
Locate the facility at a site that would:					
be large enough for all BIG components (i.e., intermodal facility, transload warehouse center, block swap yard, additional laydown area, and additional tracks along BNSF's existing mainline);	Yes	Yes , but to a lesser degree given this alternative would reduce the capacity of the transload warehouse center by approximately 11 percent due to spatial constraints.	Yes	Yes	Yes

Table 8-3: BIG On-Site Alternatives Rejected for Inability to Meet Project Objectives

Objective	BIG Flipped Concept	Reduced BIG Flipped Concept	Block Swap Only	Intermodal Facility/ Transload Warehouse Center Only	No On-Site Warehouses
be positioned along BNSF's existing mainline and near where the Cajon, Mojave, and Needles Subdivision mainlines converge (i.e., the "Subdivision Wye");	Yes	Yes	Yes	Yes	Yes
be positioned near an existing locomotive maintenance facility, or with sufficient space for a new locomotive maintenance facility;	Yes	Yes	Yes	Yes	Yes
be positioned a reasonable distance from heavily urbanized areas (where land use incompatibilities can be minimized) yet near an existing employment base, freeways, and essential infrastructure;	Yes	Yes	Yes	Yes	Yes
be relatively level and largely devoid of existing land uses and sensitive biological resources;	No , given this alternative would require relocation of Main Street through a sensitive species habitat.	Yes	Yes	Yes	Yes
allow for sufficient on-site power generation to the rail yard (i.e., solar farm).	No , given a solar farm could not be constructed under this alternative.	No , given a solar farm could not be constructed under this alternative.	Yes , but because a block swap yard has minimal electrical demand, it is uncertain whether a solar farm would be needed or constructed under this alternative.	Yes	Yes

8.9 ALTERNATIVES TO THE PROPOSED GENERAL PLAN

Proposed General Plan

The following alternatives have been determined to represent a reasonable range of alternatives to the proposed General Plan, which have the potential to attain most of the proposed General Plan’s basic objectives, would be feasible, and which may avoid or substantially lessen any of the significant effects of the proposed General Plan. The following alternatives are analyzed below:

- No Proposed General Plan/2015 General Plan Alternative
- No BIG/Proposed General Plan Reduced Development Alternative

An EIR must identify an “environmentally superior” alternative and where the No Project Alternative is identified as environmentally superior, the EIR is then required to identify as environmentally superior an alternative from among the others evaluated. Each alternative’s environmental impacts are compared to the proposed General Plan and determined to be environmentally superior, neutral, or inferior. **Section 8.11: Environmentally Superior Alternative** identifies the Environmentally Superior Alternative to the proposed General Plan. The preferred land use alternative (proposed General Plan) is analyzed in detail in **Section 5.0**.

8.9.1 No Proposed General Plan/2015 General Plan Alternative

Description of Alternative

The No Proposed General Plan/2015 General Plan (No Project) Alternative would continue to implement the City’s 2015 General Plan in addition to the adopted 2021 Safety Element, 2021 Environmental Justice Element, and 2021-2029 6th Cycle Housing Element. Under the No Project Alternative, the City would continue to use the 2015 General Plan Land Use Plan to permit development; see **Figure 3-9: 2015 General Plan Land Use Plan and Table 3-4: Existing General Plan Land Use**. As depicted in **Figure 3-9** and presented in **Table 3-4**, most of the City’s incorporated area is designated General Industrial (approximately 5,240 acres or approximately 20 percent) and Single Family Residential (approximately 4,733 acres or approximately 18 percent). As shown in **Table 8-4: Buildout Statistical Summary to 2048 – Proposed General Plan**, this alternative would have a buildout capacity of approximately 16,868 dwelling units and approximately 17,442,339 square feet of non-residential uses, with a forecast population of approximately 45,603 persons and approximately 19,810 jobs by 2048.

Under the No Project Alternative, none of the proposed General Plan’s land use designation or policy changes would occur. Additionally, the approximately 4,300-acre BIG Specific Plan would not be adopted, and the rezoning and annexation of 2,785 acres of unincorporated County land, including the 2,686 acres within the BIG Specific Plan area, would not be completed. Therefore, under this alternative, the City’s land area would continue to total 26,428 acres, and the increased City limits resulting from the proposed General Plan’s annexation (approximately 10 percent) would not occur. **Figure 3-2** and **Figure 3-13: Proposed General Plan Land Use Plan** show that future development under the 2015 General Plan Alternative would allow new development and redevelopment in the same general areas as the proposed General Plan.

Table 8-4: Buildout Statistical Summary to 2048 – Proposed General Plan									
Development Type	2023	Proposed General Plan			2015 General Plan			2015 Compared to Proposed General Plan Change	
		2048	Change vs. 2023		2048	Change vs. 2023			
			Amount	%		Amount	%	Amount	%
Dwelling Units	13,130	19,738	6,608	50.3	16,868	3,748	28.8	-2,870	-14.5
Non-Residential Uses (SF)	11,071,592	26,412,790	15,341,198	138.6	17,442,339	6,370,747	57.5	-8,970,451	-34.0
Population	34,302	52,833	18,531	54.0	45,603	11,301	32.9	-7,230	-13.7
Jobs	14,416	25,235	10,819	75.0	19,810	5,394	37.4	-5,425	-21.5
Source: Appendix 5.13-1: Buildout Methodology.									

Development under the 2015 General Plan would be different and considerably less than under the proposed General Plan, as presented in **Table 3-4**. As shown in **Table 3-4**, the land intended for development within the City under this alternative would also be less than the proposed General Plan.

For example, the proposed General Plan would redesignate the 2015 General Plan's Open Space/Conservation (OS/C) lands, which account for approximately 5.0 percent (1,349 acres) to alternative urban land use designations. The proposed General Plan would eliminate the 2015 General Plan's Interim Open Space/Resource Conservation (IOS/RC) designation, which accounts for approximately 6.0 percent of the City's land (1,504 acres) and redesignate these lands as Open Space. These land use changes would not occur under the 2015 General Plan Alternative.

The No Project Alternative would keep the approximately 4,733 acres designated Single Family Residential, or approximately 2,888 acres more than under the proposed General Plan. Similarly, under the 2015 General Plan approximately 521 acres are designated Medium Density Residential, or 872 acres less than under the proposed General Plan. As the proposed General Plan would designate more land to higher residential densities, the No Project Alternative would maintain the lower residential densities under the 2015 General Plan.

Table 8-4: Buildout Statistical Summary to 2048 – Proposed General Plan identifies citywide general jobs and housing buildout assumptions for the No Project Alternative as compared to the proposed General Plan. It is important to note that these forecasts are not growth projections. That is, they do not anticipate what is likely to occur by a certain date but provide a buildout scenario that would only occur if all the areas of the City (and respective Sphere of Influence (SOI)) were to develop to the probable development capacities yielded by the designated land use. Note, as the 2015 General Plan did not forecast beyond 2020, **Table 8-4: Buildout Statistical Summary to 2048 – Proposed General Plan** extrapolates the City's potential growth based on 1990 to 2023 California Department of Finance historic data for the City. Without BIG, it is unclear what job growth would occur in the region under this alternative. Therefore, the table forecasts job growth through 2048 based on historic growth within the region.

As shown in **Table 8-4: Buildout Statistical Summary to 2048 – Proposed General Plan**, the No Project Alternative would have a buildout capacity of approximately 16,868 dwelling units and approximately 17,442,339 square feet of non-residential uses, with a forecast population of approximately 45,603

persons and approximately 19,810 jobs by 2048. In contrast, the proposed General Plan would have a buildout capacity of 19,738 persons and approximately 26,412,790 square feet of non-residential uses, with a forecast population of approximately 52,833 persons and approximately 25,236 jobs by 2048. **Table 8-4: Buildout Statistical Summary to 2048 – Proposed General Plan** also evaluates the forecast growth over existing 2023 conditions for the 2015 General Plan and proposed General Plan. As indicated in the table, when considering the growth over existing conditions, this alternative would result in less overall growth by 2048 than the proposed General Plan.

- Approximately 15 percent less growth in housing or approximately 2,870 fewer dwelling units;
- Approximately 34 percent less growth in non-residential development or approximately 8,970,451 less square feet;
- Approximately 14 percent less population growth or approximately 7,230 fewer persons; and
- Approximately 22 percent less job growth or approximately 5,426 fewer new jobs.

As discussed in the analyses below, this alternative would generally result in fewer environmental impacts than the proposed General Plan given there would be overall less buildout potential under the 2015 General Plan. This alternative would not meet most of the proposed General Plan's objectives.

Impact Comparison to the Proposed General Plan

An evaluation of the potential environmental impacts of the 2015 General Plan Alternative, as compared to those of the proposed General Plan, is provided below.

Aesthetics

Less development would occur under this alternative, which could result in less potential for new development to obstruct views of scenic resources/degrade visual quality when compared to the greater development capacity under the proposed General Plan. Similarly, lighting and glare impacts under this alternative would be less than under the proposed General Plan given fewer sources of lighting and glare would be developed. Notwithstanding, like the proposed General Plan, impacts concerning light and glare would remain significant and unavoidable given this alternative would still introduce new sources of light and glare that would be visible in areas that are currently undeveloped, resulting in a significant changes when compared to existing conditions. Therefore, light and glare impacts under this alternative would remain significant and unavoidable like the proposed General Plan.

Development under the 2015 General Plan and the proposed General Plan would be required to comply with the same Barstow Code regulations that reduce aesthetic impacts including the City's development standards, design guidelines, and light trespass standards found in Barstow Code Chapter 19.08 – Design Guidelines. Additionally, the aesthetics-related policies under the 2015 General Plan would be generally equally effective on new development as policies under the proposed General Plan. The 2015 General Plan contains Goal 2: The City seeks to ensure an aesthetically pleasing appearance to the community that would maintain and enhance property values throughout the planning area. In contrast, 2015 General Plan includes a policy to pursue landscape and lighting districts for streets, key gateways, and near public use areas (Policy 2.A) and a policy to appropriately enforce Municipal Code provisions and Use Permit Conditions pertaining to maintenance of private property and the abatement of public nuisances, (Policy

2.B). The proposed General Plan also includes Policy 2.C that encourages quality design in all development projects and the enhancement of existing developed properties. Under the No Project Alternative these policies would continue. The proposed General Plan includes similar policies such as Policy LU 3-2 Downtown Design and Land Use that creates a pedestrian friendly atmosphere and encouraging both daytime and nighttime activities. Policy LU 4.1 encourages good design and continual property maintenance.

Unlike the 2015 General Plan, the proposed General Plan includes additional policies on the placement of residential uses west of Interstate 15 (I-15) and State Route 58 (SR-58) (Policy LU-1.4), an enhanced public realm (Policy LU-7.1,) and public art (OSC 7.4). The proposed General Plan also contains requirements for screening of truck loading areas (OSC-7.6). As such, the 2015 General Plan does not include various aesthetics-related policies included in the proposed General Plan. While the 2015 General Plan contains less detail on design policy than the proposed General Plan, the No Project Alternative would continue to allow the City to review projects to meet the City's aesthetic goals.

Overall, aesthetic impacts under the 2015 General Plan Alternative would be less than the proposed General Plan given there would be less development overall. Like the proposed General Plan, impacts concerning scenic vistas, scenic resources, and visual quality would remain less than significant, while impacts concerning lighting and glare would remain significant and unavoidable.

Agriculture and Forestry Resources

The No Project Alternative would retain the City's existing SOI, however unlike the proposed General Plan, SBIAFCO Actions A and B would not occur under this alternative. However, like the proposed General Plan, future development under this alternative could result in other annexations of land within the City's SOI and the conversion of agricultural uses since the existing land use pattern allows for future development in the SOI. However, since this alternative would result in considerably less residential and non-residential growth when compared to the proposed General Plan, the pressure to expand development outside the City limits would likely be less. The 2015 General Plan does not contain policies regarding the preservation or mitigation of agricultural land. As this alternative would not expand the existing industrial area, it is likely that less land would be converted to non-agricultural uses than would occur with the proposed General Plan. The proposed General Plan permits indoor agriculture, largely associated with medical marijuana cultivation (Policy OSC-2.4), but does not anticipate large agricultural areas within the unincorporated SOI. There are no forestry resources within the proposed General Plan area and neither the 2015 General Plan nor the proposed General Plan contain policies concerning forestry resources.

Overall, impacts concerning agricultural resources under the 2015 General Plan Alternative would be like those under the proposed General Plan. Both land use plans would allow non-agricultural development in areas with important farmland and would therefore result in significant unavoidable impacts to agricultural resources. Impacts under this alternative would, however, be less than under the proposed General Plan since the demand to develop in outlying areas of the unincorporated SOI would be less.

Air Quality

The residential development density and non-residential development intensity under the No Project Alternative would be less than under the proposed General Plan. As such, this alternative would result in less construction and fewer vehicle trips and therefore less criteria air pollutant emissions and TACs than the proposed General Plan. **Table 5.3-10: Horizon Year 2048 City of Barstow and SOI Criteria Air Pollutant Emissions** demonstrate that emissions under the 2015 General Plan would be less than under the proposed General Plan but would still exceed the MDAQMD's significance thresholds for most criteria air pollutants. This alternative would also maintain the 2015 General Plan's goals and policies that address air quality including Resource Conservation and Open Space Element Goals 2 and 5. These goals, and their constituent policies and strategies, direct development in the City to adhere to MDAQMD's adopted rules (Policy 2A) and encourage communication between the City and other agencies impacted by air quality planning (Policy 5A).

The 2015 General Plan provides guidance on addressing air quality impacts. The proposed General Plan similarly provides this guidance but provides additional clarity and direction for these measures. The 2015 General Plan's air quality-specific measures would not be consolidated under a single Goal (Goal OSC-3) as proposed by the proposed General Plan to reduce redundancy and focus the City's efforts on actionable steps for improving air quality. This alternative would not include the proposed General Plan's policies, which would also implement new air quality-related policies with a focus on environmental justice. Development under this alternative would therefore not benefit from the additional policies added under the proposed General Plan to protect air quality and implement environmental justice.

Overall, given the 2015 General Plan would involve significantly less development than under the proposed General Plan, air quality impacts under this alternative would be less. Like the proposed General Plan, impacts under this alternative would remain significant and unavoidable as shown in **Table 5.3-10**.

Biological Resources

Development under the No Project Alternative would be subject to the same City, State, and federal regulations as the proposed General Plan, with the same SOI extent. Therefore, impacts to biological resources would be similar to the proposed General Plan. However, this alternative would exclude the annexation areas under SBIAFCO Actions A and B and would result in less development in previously undisturbed areas, which would result in less impact to biological resources when compared to the proposed General Plan. As noted above, while the 2015 General Plan would retain more land in the 2015 General Plan's Interim Open Space/Resource Conservation designation, the land use designation was intended as a holding designation for future urban development. Although the 2015 General Plan would not relabel the land designated Open Space/ Conservation with a Public land designation, the underlying intent of both plans is to conserve the land remains unchanged.

New policies protecting biological resources in the proposed General Plan would not be implemented under this alternative. The proposed General Plan largely maintains a similar scope and focus for biological resource-related policies when compared to the 2015 General Plan but seeks to provide wider applicability and enforceability of the measures for future development. For example, Strategy 3.A.2 under the 2015 General Plan's Resource Conservation and Open Space Element which directs the City to

establish corridors for the movement of wildlife between the established Desert Wildlife Management Areas and the Desert Tortoise Critical Habitat was revised as Policy OSC-5.3 in the proposed General Plan which directs to the City to coordinate the planning, design, and maintenance of drainage channels and utility easements to provide wildlife corridors and connectivity between open space areas in the community and surrounding desert. The intent of this revision and others is to provide improved direction for implementing measures that protect biological resources in accordance with regulations and guidance from the State and federal level, including the Migratory Bird Treaty Act, Clean Water Act, and the Endangered Species Act.

While the 2015 General Plan would not provide the proposed General Plan's improvements to the City's policies regarding biological resources, impacts to biological resources under this alternative would be less than the proposed General Plan given the scale of development under this alternative would be less. Impacts to biological resources from both land use plans would be mitigated to less than significant with mitigation measures incorporated and following compliance with the regulatory framework.

Cultural Resources

Under both the No Project Alternative and the proposed General Plan, land uses throughout the City would be required to comply with existing federal, State, and local regulations concerning cultural resources. Development on previously undisturbed sites is generally considered to have the potential to result in impacts to cultural resources. Because this alternative would result in less overall development than the proposed General Plan including in the City's outlying areas that have not been previously developed, this alternative would result in fewer potential impacts on cultural resources than the proposed General Plan. Like the proposed General Plan, impacts under this alternative would be less than significant with mitigation measures incorporated for human remains. This alternative could also result in fewer impacts to designated or eligible historic buildings since the demand for redevelopment including within the City's historic core along Route 66 and the downtown would be less than under the proposed General Plan. Development under this alternative could nonetheless result in impacts to archaeological resources and historic resources, which like the proposed General Plan, would remain significant and unavoidable even with mitigation measures incorporated.

While the No Project Alternative would result in less development, it would not benefit from implementation of proposed General Plan policies that would increase protection of the City's cultural resources. The 2015 General Plan's Resource Conservation and Open Space Element includes a policy and four strategies under Goal 4 to preserve and protect the City's cultural resources. However, this alternative would not benefit from the proposed consolidation/updates to these measures. The proposed General Plan consolidates and expands these measures under Goal OSC-7 and its eight implementing policies, which provide more specific and streamlined guidance on protecting cultural resources. For example, proposed General Plan Policy OSC-7.7 requires that new development include appropriate mitigation to preserve the quality and integrity of archaeological (and paleontological) resources and emphasizes the importance of avoidance to preserve these resources. 2015 General Plan Strategy 4.A.3 more broadly states that the City shall preserve and protect, to the greatest extent possible, archaeological and paleontological sites and features. Furthermore, the proposed General Plan also includes a greater focus on the preservation of the City's cultural identity of with goals and policies in both

the Open Space and Conservation Element and the Land Use Element. Numerous proposed General Plan policies promote this goal, including Policy LU-3.1 which directs the City to enhance the visibility and tourism value of Barstow's Route 66 Main Street in the downtown, with a focus on the promotion of cultural and historic resources. These proposed policies would not implemented under the 2015 General Plan.

Overall, while this alternative would not implement the proposed General Plan's new cultural resource-related policies, it would result in less impact to cultural resources given this alternative involves less overall development potential.

Energy

Under the No Project Alternative, less development would occur when compared to the proposed General Plan, thereby resulting in less overall energy use in the City. However, as existing uses are redeveloped and replaced by more energy-efficient buildings adhering to the most recent California Building Standards Code updates, energy consumption would be expected to decrease similarly under both plans. However, the 2015 General Plan would not implement the proposed General Plan's new goals and policies that provide increased direction, specificity, and applicability for reducing energy consumption. The 2015 General Plan would not implement the numerous policies included in the proposed Land Use and Circulation and Mobility Elements that aim to reduce VMT and therefore decrease transportation fuel use. Proposed General Plan policies under Goal OSC-8 of the Open Space and Conservation Element are intended to update the strategies under 2015 General Plan Resource Conservation and Open Space Element Goal 6. For example, proposed General Plan Policy OSC-8.4 which encourages new development and existing buildings to incorporate design elements, building materials, orientation, and fixtures to improve environmental sustainability and reduce emissions, would replace 2015 General Plan Strategy 6.A.4, which states: encourage residents and businesses to utilize the incentives provided by local energy providers to retrofit their buildings and businesses for energy efficiency and conservation. The 2015 General Plan introduce the proposed General Plan's new avenues for reducing energy consumption such as Policy CM-8.3, which directs the City to fund and install zero emissions infrastructure.

The 2015 General Plan would not implement new policies that target the reduction of energy use but would not potentially result in the construction of more energy efficient buildings (given more buildings being developed) and VMT-reducing circulation improvements. Still, the 2015 General Plan would involve less development in the City overall, resulting in less energy use when compared to the proposed General Plan. As with the proposed General Plan, energy impacts would be less than significant.

Geology, Soils, and Mineral Resources

As with the proposed General Plan, individual development projects under the No Project Alternative would be required to prepare site-specific geotechnical investigations to evaluate seismic, liquefaction, ground settlement, paleontological resources, and/or soil expansion hazards. Under both plans, development projects would be required to comply with existing federal, State, and local regulations, such as the California Building Code and statewide General Construction Permit to mitigate potential geology and soils impacts. Site-specific development that requires ground-disturbing activities have the potential to uncover paleontological resources, requiring the implementation of mitigation measures under both

this alternative and the proposed General Plan. However, the No Project Alternative would result in less development in previously undeveloped areas of the City where undiscovered paleontological resources could exist, which would result in lesser impact concerning the protection of these resources. This alternative, like the proposed General Plan, would also allow development in areas that have known deposits of valuable mineral resources, resulting in significant and unavoidable impacts. Since the proposed General Plan would result in more development within the City when compared to this alternative, the proposed General Plan has a higher potential of allowing development that is incompatible with mineral resource extraction in known mineral resource zones.

While impacts concerning geologic and seismic hazards and protection of paleontological and mineral resources would be similar between this alternative and the proposed General Plan, the proposed General Plan would implement new or updated policies for each of these topic areas. For example, the proposed Safety Element, which incorporates guidance from State laws for emergency preparedness that have been passed since the adoption of the 2015 General Plan, includes a suite of new policies addressing geologic hazards. Proposed Policy S-1.6 prohibits the construction of new critical facilities and hazardous materials uses within Alquist-Priolo Fault Zones while proposed Policy S-1.10 discourages all new development in geologic hazard zones to the extent possible. The 2015 General Plan's Safety Element does not specifically address seismic/geologic hazards. Additionally, while the 2015 General Plan includes no policies to address mineral resources, the proposed General Plan three new policies under Goal OSC-6 in the Open Space and Conservation Element that prioritize the development of compatible uses in the City's mineral resource zones.

In summary, development under both this alternative and the proposed General Plan would comply with the applicable regulations resulting in similar impacts concerning exposure to geologic hazards. Impacts concerning paleontological resources and mineral resources would be less under this alternative, despite the implementation of new policies under the proposed General Plan that provide increased protection for these resources.

Greenhouse Gas Emissions

The residential development density and non-residential development intensity under the No Project Alternative would be less than under the proposed General Plan. As such, this alternative would result in less GHG emissions. This alternative would, however, continue development under the 2015 General Plan, which contains fewer policies emphasizing VMT reductions. Reducing VMT remains an important component of reducing GHG emissions since the transportation sector is the largest source of GHG emissions in the State. While the 2015 General Plan includes Goal 3 and its accompanying policies and strategies in the Circulation Element to address VMT reductions, it would not include proposed General Plan Goal CM-2 and its policies, which provide updated and more specific targets and actions for this purpose. For example, the 2015 General Plan does not include proposed General Plan Policy CM-2.4 encouraging transit improvements in the City and Policy CM-2.10 directing the City to implement a transportation demand management program. These policies address new topic areas for reducing VMT that are not a part of the 2015 General Plan's VMT reduction measures. Additionally, the 2015 General Plan would not include the proposed General Plan's new policies that identify specific actions to implement Goal CM-2 including updating the City's Active Transportation Plan, pursuing funding for

bicycle safety training, building a Class I multipurpose path across I-15, and funding transit facility upgrades in transit-dependent neighborhoods.

While the proposed General Plan would implement GHG/VMT-reducing policies, the 2015 General Plan would involve overall less development potential, which would generate less GHG emissions. However, GHG emissions would still remain significant and unavoidable under both plans.

Hazards and Hazardous Materials and Wildfire

Under both the No Project Alternative and the proposed General Plan, development throughout the City would be required to comply with existing federal, State, and local regulations governing use, storage, transport, and disposal of hazardous materials and hazardous waste. Land development under this alternative could result in the use of hazardous materials during construction and placement in hazardous conditions such as fault lines, like that of the proposed General Plan. However, because less development would occur under the 2015 General Plan than under the proposed General Plan, potential impacts concerning hazardous materials would also be less. This alternative would not include the proposed General Plan's updated Safety Element policies, which would provide new guidance for protection from hazards and emergency preparedness. For example, the 2015 General Plan does not include General Plan Policies S-1.3 and S1.6, which provide requirements for new development to ensure hazard preparedness and resiliency, and Goal S-3 and its accompanying policies that provide new guidance for protection against hazardous materials exposures. Furthermore, the 2015 General Plan would not include proposed General Plan Safety Element updates to designate and evaluate the performance of the City's evacuation routes.

The 2015 General Plan would result in less potential development than the proposed General Plan, but the 2015 General Plan would not include the updated policies that are included in the proposed General Plan to help offset impacts. Overall, this alternative would result in fewer potential hazardous material impacts than the proposed General Plan because it would involve less development than the proposed General Plan. Following compliance with existing State and federal laws regarding the use and storage of hazardous materials, this alternative would result in less than significant impacts like the proposed General Plan.

Hydrology and Water Quality

The No Project Alternative would have similar hydrology and water quality impacts as the proposed General Plan. Under both plans, future project-specific water quality management plans (WQMPs), preliminary and/or final, would be prepared at the time of future development applications. Moreover, Low Impact Development (LID) and water quality treatment solutions prescribed in project-specific WQMPs would be designed to support or enhance the best management practices (BMPs) and efforts implemented by the City to improve water quality. During construction, project-specific Stormwater Pollution Prevention Plans (SWPPP) would be required. The SWPPP would describe construction BMPs that address pollutant source reduction and provide measures/controls necessary to mitigate potential pollutant sources.

The 2015 General Plan does not include the proposed General Plan Safety Element and other element policies that provide additional policies to address flood hazards. This includes proposed Policy S-3.1 to

site all critical facilities and hazardous waste facilities outside of all mapped flood hazard zones in addition to proposed Policy PFS-1.7, which directs the City to maintain its local storm drainage system to handle the capacity of 100-year storm event flows.

While proposed General Plan policies could help reduce flooding impacts for individual projects under the proposed General Plan, this alternative's impacts concerning hydrology and water quality would remain similar to, and like the proposed General Plan, less than significant.

Land Use and Planning

This No Project Alternative would leave the 2015 General Plan in place rather than providing the comprehensive update associated with the proposed General Plan. As identified in **Table 8-4: Buildout Statistical Summary to 2048 – Proposed General Plan**, when considering the growth over existing conditions, this alternative would result in substantially less overall growth by 2048 than the proposed General Plan including approximately 15 percent less housing growth (approximately 2,870 fewer dwelling units) and approximately 34 percent less growth in non-residential development (approximately 8,970,451 less square feet). The addition of the High Density Residential and Business Park land use designations that would occur under the proposed General Plan would not occur under this alternative. Also, the following proposed General Plan land use strategies would not occur under this alternative: the area west of I-15 and south of Main Street would not be redesignated Business Park; the existing Industrial designation would not be expanded west of Lenwood Road to accommodate the BIG Specific Plan; and the various properties west of the Lenwood Road and Outlet Center Drive on/offramps would not be redesignated to Industrial, allowing for more business operations that are more compatible with and would benefit from proximity to the freeway (e.g., logistics/ warehousing).

The 2015 General Plan's OS/C and IOS/RC land use designations do not result in land conservation in the conventional sense (i.e., protection and preservation of land in its natural state). Rather, these land use designations are intended as "holding" designations for future urban uses based on the following 2015 General Plan definitions:

- **Interim Open Space/Resource Conservation (IOS/RC).** Lands within the city's Sphere of Influence that are not expected to be developed within the time frame of the current General Plan (2015 – 2020) due to cost constraints associated with the expansion of city infrastructure have been assigned this interim designation. It is anticipated that subsequent revisions to the General Plan will result in gradual, planned conversion of these lands to urban uses at such time as is warranted by market demand and economic viability.
- **Open Space/Conservation (OS/C).** This designation applies to lands with high environmental resource value, such as habitat for threatened or endangered species, scenic vistas or archaeological significance. The majority of these lands fall under public (e.g., BLM) or quasi-public (e.g., PG&E) ownership.

The proposed General Plan renames lands in these categories to better communicate the intended long-term land use. For example, under the proposed General Plan, most of the 2015 General Plan's Interim Open Space/Resource Conservation land use designation would change to Business Park and the Open Space/Conservation land use designation would change to Public Land. Note that these proposed land

use designation changes, which would affect lands within the unincorporated SOI that would not be physically altered by the proposed General Plan, would not occur under the 2015 General Plan.

The No Project Alternative does not include the proposed General Plan policies that seek to expand access and mobility for residents, expanding upon existing policies. For example, 2015 General Plan Circulation Element Goal 1, which tasks the City with maintaining and expanding a safe, efficient and convenient circulation system, would not be replaced by proposed General Plan Circulation and Mobility Element Goal CM-1. The 2015 General Plan does not include these proposed policies, which present new strategies for accomplishing this goal but also largely update the existing policies, broaden their scope, and remove actions that have been completed. For example, this alternative would not include proposed General Plan Policy CM-1.6, which requires new development to pay a fair share of needed transportation improvements based on a project's impacts which would help to ensure that needed transportation connections for future projects are funded.

This alternative would not include proposed General Plan policies under Goal CM-2, which seek to make the City's roadways more accessible for alternative modes of transportation. These include Policies CM-2.5, CM-2.6, CM-2.8, and CM-2.9 which offer strategies for enhancing pedestrian, transit, and bicycle environments, optimizing street and facility designs, expanding public space networks, managing access points, and ensuring convenient access to new developments. The 2015 General Plan policies would also comply with applicable Connect SoCal goals, however, to a lesser degree than the proposed General Plan given the 2015 General Plan's date of adoption. The proposed General Plan would be consistent with applicable Connect SoCal goals (see **Table 5.11-6 in Section 5.11: Land Use and Planning**). While the 2015 General Plan's equivalent policies would also be consistent with the RTP, the proposed General Plan's policies were designed to help implement the most recent RTP goals while the 2015 General Plan's measures reflect earlier iterations of the RTP.

The 2015 General Plan allows residential development in areas near the existing railroad and in some industrial areas. While the proposed General Plan allows residential uses to continue, the development trend that would be established in the proposed General Plan through Policy LU-1.4 is to prioritize non-residential uses west of I-15 and SR-58. This policy supports recent legislation from the State that seeks to distance truck docks and impacts from warehousing projects from homes, would not be implemented under this alternative. As shown in Table LU-1, the proposed General Plan's new Business Park Land Use Designation would allow the primary residential unit to continue as a legacy use either: 1) as a permitted use on parcels with existing residential units, or 2) to be built as a new use on a vacant parcel that is both adjacent to a parcel that contains an existing residential use and is 5 acres or smaller. No new residential subdivisions are permitted, and any parcels that are the result of non-residential subdivisions cannot be used for residential purposes. These policies are not part of the 2015 General Plan and would not be implemented under this alternative. Without such policies, it may be more difficult to site housing and non-residential uses without potential for conflict. This would reduce the City's ability to expand jobs and meet the first three project objectives.

Overall, impacts concerning land use and planning under this alternative would be greater than the proposed General Plan but would remain less than significant.

Noise

The residential development density and non-residential development intensity under the No Project Alternative would be less than under the proposed General Plan. As such, this alternative would result in less construction and operational noise impacts than the proposed General Plan. This would include less noise from construction activities and less traffic noise. Noise impacts under the proposed General Plan would be significant and unavoidable, and while the amount of development would be less under this alternative, construction activities under both plans would still have the potential to exceed ambient levels such that impacts would be significant and unavoidable. Additionally, both the 2015 General Plan and proposed General Plan would adopt the same noise standards in their respective Noise or Safety Elements, and therefore development under either would be subject to the same noise standards. However, this alternative would not provide the consolidated set of noise goals proposed in the Safety Element to replace existing noise policies and strategies under Goals 1 and 2. For example, the proposed General Plan would implement clear requirements for new residential and non-residential development that delineate when a noise and vibration impact study would be warranted (Policies S-4.2 and S-4.3). While the 2015 General Plan provides specific standards for assessing and regulating noise impacts on sensitive uses, these are not implemented through corresponding regulations in the Barstow Code. This alternative would not include the proposed General Plan's action to create and implement a noise and vibration ordinance for the City that would apply across all future projects whether ministerial or discretionary.

Overall, although this alternative would not include the proposed General Plan's measures to enforce the City's noise standards, this alternative would involve fewer noise sources within the City.

Population and Housing

As indicated in **Table 8-4: Buildout Statistical Summary to 2048 – Proposed General Plan**, when considering the growth over existing conditions, the No Project Alternative would result in substantially less overall growth by 2048 than the proposed General Plan including approximately 15 percent less housing growth (approximately 2,870 fewer dwelling units) with approximately 14 percent less population growth (approximately 7,230 fewer persons), and approximately 34 percent less growth in non-residential development (approximately 8,970,451 less square feet), with approximately 22 percent less job growth (approximately 5,425 fewer new jobs).

The proposed General Plan is anticipated to result in more jobs and housing than projected in the SCAG 2050 growth forecast given the basis for SCAG's projections is the 2015 General Plan; this condition would not occur under the No Project Alternative. However, it should be noted that future updates to SCAG's growth forecast would be based on the City's adopted General Plan at that time. Both the 2015 General Plan and proposed General Plan include a goal and accompanying policies in their Land Use Elements that promote economic development in the City (Goal 4 in the 2015 General Plan and Goal LU-2 in the proposed General Plan) which largely target similar themes of expansion and balance, resulting in similar effects concerning population and housing impacts.

The proposed General Plan is anticipated to result in more jobs and housing than projected in the SCAG 2050 growth forecast given the basis for SCAG's projections is the 2015 General Plan; this condition would

not occur under the No Project Alternative. However, it should be noted that future updates to SCAG's growth forecast would be based on the City's adopted General Plan at that time. Both the 2015 General Plan and proposed General Plan include a goal and accompanying policies in their Land Use Elements that promote economic development in the City (Goal 4 in the 2015 General Plan and Goal LU-2 in the proposed General Plan) which largely target similar themes of expansion and balance, resulting in similar effects concerning population and housing impacts.

Overall, the proposed General Plan would exceed SCAG's projections for housing, population, and job growth in the City by 2050 given the basis for SCAG's projections is the 2015 General Plan. As the 2015 General Plan is the current adopted plan and would not change in this alternative, it would remain consistent with SCAG's growth projections for the City. Further, housing and population growth under this alternative would be less than under the proposed General Plan. However, it should be noted that future updates to SCAG's growth forecast would be based on the City's adopted General Plan at that time.

Public Services and Recreation

The No Project Alternative would result in less population growth compared to the proposed General Plan, and therefore, impacts to recreational facilities would be less than the proposed General Plan. Under both plans, impacts to recreational facilities would be less than significant. However, under this alternative, the proposed General Plan's consolidation and modernization of the City's policies concerning public services would not occur. The 2015 General Plan Safety Element includes measures for maintaining public safety services while the proposed General Plan expands on these as part of a Public Facilities and Services Element that includes additional policies for schools (PFS-2.7), library access (PFS-2.8), and healthcare (PFS-2.9).

Overall, this alternative would result in less population growth than under the proposed General Plan, thus, would potentially require less future expansion or construction of new public service facilities, resulting in fewer environmental impacts than the proposed General Plan.

Transportation

As indicated in **Table 8-4: Buildout Statistical Summary to 2048 – Proposed General Plan**, when considering the growth over existing conditions, the No Project Alternative would result in substantially less overall growth by 2048 than the proposed General Plan. This alternative, however, would not implement policies that would provide multimodal facilities in the City and reduce VMT (boundary VMT/Service Population [SP], Home-Based Production [HBP] VMT/Resident, and Home-Based-Work Attraction [HBWA] VMT/Employee only). For example, this alternative does not include proposed General Plan Goal CM-2 and its policies to provide updated and more specific targets and actions for reducing VMT to replace existing Circulation Element measures under Goal 3. Proposed Policy CM-2.4 encouraging transit improvements in the City and Proposed Policy CM-2.10 directing the City to implement a transportation demand management program, address new topic areas for reducing VMT are currently not a part of the 2015 General Plan's VMT reduction measures, thus would not be implemented under this alternative. This alternative does not include the proposed General Plan policies that identify specific actions to implement Goal CM-2 including updating the City's Active Transportation Plan, pursuing

funding for bicycle safety training, building a Class I multipurpose path across I-15, and funding transit facility upgrades in transit-dependent neighborhoods.

While improvements under the proposed General Plan may decrease VMT over time, this alternative would result in less overall growth and less VMT. Impacts under both this alternative and the proposed General Plan would remain significant and unavoidable.

Tribal Cultural Resources

Development under the No Project Alternative would be subject to the same regulations as the proposed General Plan, and a similar land use pattern, thus, impacts to tribal cultural resources would be similar to the proposed General Plan. However, this alternative would exclude the annexations under SBLAFCO Actions A and B and would result in less development in previously undisturbed areas, which would result in less impacts to tribal cultural resources when compared to the proposed General Plan.

Under both this alternative and the proposed General Plan, land uses throughout the City would be required to comply with existing federal, State, and local regulations concerning tribal cultural resources. Development on previously undisturbed sites is generally considered to have the potential to result in impacts to tribal cultural resources. Because this alternative would result in less overall development than the proposed General Plan including in the City's outlying areas that have not been previously developed, this alternative would result in fewer potential impacts on tribal cultural resources than the proposed General Plan. Both the 2015 General Plan and the proposed General Plan would implement similar measures to ensure the protection of tribal cultural resources including proposed General Plan Policy OSC-7.8, which would require appropriate treatment/preservation of cultural resources, in accordance with State and federal standards, and in consultation with interested Native American tribes, and 2015 General Plan Strategy 4.A.4, which requires a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources to monitor all ground-disturbing activities for development projects with identified archaeological sensitivity.

Overall, while this alternative would not implement the proposed General Plan's new tribal cultural resource-related policies, it would result in less impact to tribal cultural resources given this alternative involves less overall development potential. Under both plans, impacts would be significant and unavoidable even with mitigation measures incorporated.

Utilities and Service Systems

When considering the growth over existing conditions, the No Alternative would result in substantially less overall growth by 2048 than the proposed General Plan resulting in less demand for utilities and service systems, and thus, less need to construct new or modifying existing systems that might have an environmental impact (see **Table 8-4: Buildout Statistical Summary to 2048 – Proposed General Plan**).

Development under both the 2015 General Plan and the proposed General Plan would be subject to similar policies concerning utility and service systems, which generally encourage the upkeep and provision of utility infrastructure commensurate with development. The proposed General Plan includes Goal PFS-1, which lists policies that would be implemented for utility services, while the 2015 General Plan includes policies under Resource Conservation and Open Space Element Goal 1. Overall impacts

concerning utilities and service systems under this alternative would be less than the proposed General Plan but would remain significant and unavoidable.

Ability to Meet Proposed General Plan Objectives

As identified in **Table 8-5: No Proposed General Plan/2015 General Plan Alternative: Ability of Alternative to Meet Project Objectives**, this alternative would not fulfill any of the proposed General Plan objectives, as identified in **Section 8.1.2**.

Table 8-5: No Proposed General Plan/2015 General Plan Alternative: Ability of Alternative to Meet Project Objectives	
Objective	Objective Met?
Objective 1. The addition of a substantial number of livable wage jobs that will strengthen the City's economic base and fiscal resiliency and provide career pathways for the community.	Meets Objective to a Lesser Extent. When compared to the proposed General Plan, this alternative would result in 21.5 percent fewer jobs. This alternative would, nonetheless, result in new jobs in the City when compared to existing conditions, thereby meeting this objective to a lesser extent than the proposed General Plan.
Objective 2. A larger amount and wider range of housing opportunities to address the needs of the community and military installations, demand from new households generated by job growth, and full spectrum of lifestyles and life stages.	Does Not Meet Objective. This objective refers to a goal for the proposed General Plan to provide a larger and wider range of housing opportunities than the 2015 General Plan. Therefore, this alternative by default does not meet this objective because it is the basis of comparison against the proposed General Plan in this objective.
Objective 3. A cohesive land use plan that appropriately transitions between residential, commercial, and industrial areas, encourages new development to leverage and improve existing infrastructure, and provides expansion opportunities to support long term growth.	Does Not Meet Objective. The proposed General Plan includes land use changes that target better transitions and cohesion between land uses including changes that would discourage new housing west of I-15 and discourage new industrial uses in Central Barstow to avoid future land use compatibility conflicts. Since the 2015 General Plan would continue to allow development that could be considered less compatible when compared to the proposed General Plan, and would not allow expansion opportunities through annexations, this alternative would not meet this objective.
Objective 4. Economic opportunities that allow residents to (re)invest in the community and create generational wealth.	Meets Objective to Lesser Extent. While this alternative would result in a 37.4 percent increase of jobs when compared to existing jobs in the proposed General Plan area, when compared to the job growth under the proposed General Plan (75.1 percent over existing jobs), this alternative would create less economic opportunities and meet this objective to a lesser extent.
Objective 5. Land use and circulation plans that capitalize on Barstow's unique location, as a link on the national supply chain, and existing industrial and rail infrastructure to attract and retain innovative industrial and rail operators and to support the efficient movement of goods.	Does Not Meet Objective. When compared to the proposed General Plan, which facilitates the development of BIG, this alternative does intentionally create opportunities to capitalize on Barstow's location to attract new industrial and rail operators. Because this objective is specific to the proposed land use plan and development of BIG, this alternative would not meet this objective.
Objective 6. Goals, policies, and implementation strategies that ensure	Meets Objective to Lesser Extent. While the 2015 General Plan contains measures that target health and safety, the proposed General Plan updates many of these existing measures to more

Table 8-5: No Proposed General Plan/2015 General Plan Alternative: Ability of Alternative to Meet Project Objectives	
Objective	Objective Met?
Barstow is a healthy and safe community for residents, businesses, and visitors.	comprehensively address health and safety goals in the City and meet new State requirements. A comparison of specific policies related to environmental impacts are provided in the specific environmental impact discussions for this alternative above. Therefore, this alternative meets this objective to a lesser extent.

8.9.2 No BIG/Proposed General Plan Reduced Development Alternative

Description of Alternative

Unlike the No Project Alternative, the No BIG/Proposed General Plan Reduced Development Alternative would update the City's General Plan but would not approve the BIG Specific Plan. In place of BIG, this alternative would assume that the majority of job growth is associated with conventional logistics located near the interchanges of I-15 and Lenwood Avenue and Outlet Center Drive in the west, and SR-40 in the east. Many of the changes included in the proposed General Plan are intended to comply with State laws adopted since adoption of the 2015 General Plan, and to reflect development that has occurred since 2015. This alternative would implement the General Plan policy updates needed to remain compliant with State law but would not include the BIG Specific Plan and the associated General Plan land use designation changes and policies that support BIG.

The following Project features would be applicable to this alternative:

- Changes to the Land Use Plan that focus housing east of I-15 to provide desirable separation between logistics uses and sensitive receptors;
- A new Business Park land use designation and zone district to provide additional non-logistics job growth opportunities in the City; and
- A new High Density Residential land use designation and zone district would remain to support housing types and densities discussed in the 2021–2029 Housing Element.

With ongoing long-term demand for logistics and fewer air quality restrictions in the Mojave Desert Air Quality Management District, Barstow is likely to attract traditional truck-based warehousing without BIG. Based on input from property owners and speculative development interest, along with an evaluation of roadway capacity, this alternative assumes up to 10 million square feet of new traditional truck-based warehousing could be developed by 2048, which would generate up to 5,910 jobs and 1,413 new houses (using the same methodology as for the proposed General Plan).

However, traffic in the area is already impacted by existing development along the I-15 corridor and traditional truck-based warehousing may require substantial improvements to local and State roadways (which may or may not be economically feasible). BIG is unique in that it has the potential to add many jobs without substantially increasing truck traffic on area roadways. With its focus on rail, BIG also capitalizes on the City's historic connection to rail services, without impacting regional transportation.

Furthermore, the BIG Specific Plan is proposed by a single entity that has an existing footprint in Barstow and plays a fundamental role in the national supply chain. While the market for warehousing is strong throughout southern California and justifies an alternative with 10 million square feet of truck-based warehousing, there are reasons such warehousing may not be built at such scale and/or by 2048. The Victor Valley area to the south, for example, may support truck-based warehousing in advance of Barstow. The Victor Valley area contains thousands of acres of undeveloped land along I-15, SR-395, and the planned High Desert Corridor. Notably, the SCLA and Desert Gateway Specific Plans¹ are both approved plans in the City of Victorville (with the Desert Gateway also overlapping with unincorporated areas). These two specific plans support the development of hundreds of acres of still-to-be developed industrial lands² that permit future truck-based warehousing in locations that have equal access to major transportation facilities and a larger labor pool compared to Barstow.³

Impact Comparison to the Proposed General Plan

An evaluation of the potential environmental impacts of this alternative, as compared to those of the proposed General Plan, is provided below.

Aesthetics

Like the proposed General Plan, development under the No BIG/Proposed General Plan Reduced Development Alternative would be subject to relevant portions of the California Building Code, the City's Municipal Code, Zoning Ordinance, and relevant General Plan policies that serve to protect visual resources, including those related to (but not limited to) building height limitations under Federal Aviation Administration (FAA) regulations, landscaping, and design standards. Impacts to scenic vistas and scenic resources are considered less than significant under both the proposed General Plan and the BIG and would remain similar under this alternative.

This alternative would not result in the development of BIG but would continue to facilitate industrial truck-based warehousing in the BIG Specific Plan area that would likely have a similar visual character to that of other existing and future industrial development in the City. Due to the level and type of development expected to occur under the proposed General Plan, impacts to visual quality would be significant and unavoidable. This alternative is projected to result in overall less development than would occur by implementing BIG, but since new development that changes the visual character of the City would still occur under this alternative, impacts would remain significant and unavoidable.

While lighting and glare impacts would be reduced from not developing BIG, these impacts would remain significant and unavoidable due to the expected increase in lighting in other areas of the City under the proposed General Plan. This alternative would similarly result in new development across the City, generating new sources of light and glare. Light and glare impacts under this alternative would be significant and unavoidable.

¹ <https://www.victorvilleca.gov/government/city-departments/development/planning/land-use-plans>

² See Table 3.1 and Exhibit 3.1 of the SCLA Specific Plan and Table 4.1 and Page 4-1 of the Desert Gateway Specific Plan, along with land use plans compared to 2025 aerials.

³ The Victor Valley area, anchored by the cities of Victorville, Hesperia, and Apple Valley, contains over 340,000 residents based on 2024 figures from the California Department of Finance.

Overall impacts regarding aesthetics under this alternative would be less than those of the proposed General Plan with BIG since less overall development is expected to occur under this alternative. However, impacts would remain significant and unavoidable.

Agriculture and Forestry Resources

Under this alternative, the 313 acres of Important Farmland that would be converted to non-agricultural use under BIG would likely remain undeveloped since this land is mostly within the Specific Plan area's unincorporated portion (i.e., the City's SOI). However, under the proposed General Plan, an additional almost 2,000 acres of Prime, Statewide Importance, and Unique Farmlands in the City and SOI could be developed with non-agricultural uses, resulting in potentially significant impacts. Despite the incorporation of MM AG-1 to require future projects that propose the conversion of Important Farmland to complete a LESA and offset any loss of land deemed important under the LESA model, impacts under the proposed General Plan would remain significant and unavoidable due to the loss of Important Farmland. Therefore, this alternative would also result in significant and unavoidable impacts to farmland since other farmland in the City and SOI is assumed to be converted under buildout of the proposed General Plan. Additionally, the LESA conducted for BIG determined that the farmland within the BIG Specific Plan area does not have a value that would result in a significant impact if converted to non-agricultural use. Therefore, this alternative would result in similar impacts to Important Farmland when compared to the proposed General Plan.

Since neither the proposed General Plan area nor the BIG Specific Plan area contain active Williamson Act contracts or forest/timber land, this alternative would have the same impacts on these resources when compared to the proposed General Plan.

Overall impacts concerning agricultural and forestry resources under this alternative would be similar to the proposed General Plan since Important Farmland would continue to remain at risk for urban development.

Air Quality

Construction and operation of BIG would have significant and unavoidable impacts on regional and local air quality due to emissions from the proposed railway and intermodal facility.

Air quality and health risks under the proposed General Plan without the inclusion of BIG were also determined to result in potentially significant impacts. Implementation of **MM GP AQ-1** and **MM GP AQ-2** would reduce construction and operational emissions from future projects. However, the magnitude of the overall land use development associated with the proposed General Plan would result in significant and unavoidable impacts to regional air quality. **MM GP AQ-3** would require applicable future projects to perform a health risk assessment. However, buildout of the proposed General Plan could expose sensitive receptors to substantial concentrations of TACs. As such, the proposed General Plan's cumulative contribution to health risk is considered significant and unavoidable. Additionally, the replacement of BIG with 10 million square feet of truck-based warehousing would increase truck trips and VMT, which would result in significant and unavoidable air quality emissions and health risk impacts. Therefore, while less overall development may occur under this alternative, it would result in greater impacts to air quality when compared the proposed General Plan.

Biological Resources

Impacts to sensitive species, sensitive natural communities, aquatic resources, and migratory corridors, under the proposed General Plan, are considered less than significant due to several General Plan policies that require future projects to incorporate measures that ensure compliance with habitat and wildlife protection regulations. In addition, the BIG Specific Plan avoids the Mojave River and much of the adjacent area. Under this alternative it is assumed that some industrial development would occur within the BIG Specific Plan area in place of BIG and less development would occur overall within the City. Even without a Specific Plan it is likely that new industrial uses would also be required to avoid the Mojave River therefore impacts to the river would remain similar to the proposed Project. However, since less land is projected to be developed under this alternative, impacts to biological resources would be lesser when compared to the proposed Project.

Overall, impacts concerning biological resources under this alternative would be less than the proposed Project, given that less development would occur across the City.

Cultural Resources

This alternative would result in less overall development across the City, including within the BIG Specific Plan area where documented historical and archeological resources eligible for listing in the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR) exist. The proposed General Plan could result in the permanent loss or alteration of historic resources resulting in significant and unavoidable impacts despite the incorporation of **MM GP CUL-1** through **MM GP CUL-4**. Impacts to archeological resources are considered less than significant with the incorporation of **MM GP CUL-4**. Development under this alternative is assumed to be less intensive than the scale of the proposed General Plan due to the smaller demand for housing that would occur in lieu of the large-scale job growth from BIG. Therefore, this alternative may result in fewer impacts to cultural resources due to the smaller buildout of development assumed within the proposed General Plan area. However, since new development across the City that could impact cultural resources would still occur, impacts to historic resources would remain significant and unavoidable.

Overall, impacts concerning cultural resources under this alternative would be less than the proposed General Plan. However, impacts would remain significant and unavoidable.

Energy

Neither the proposed General Plan nor BIG would result in the wasteful, inefficient, or unnecessary consumption of energy resources or conflict with relevant energy regulations. This alternative would also result in less overall development when compared to the proposed General Plan and therefore less energy consumption during construction and operational activities. Overall, impacts to energy would be lesser than the proposed General Plan and would remain less than significant.

Geology, Soils, and Mineral Resources

As with the proposed General Plan, individual development projects under this alternative would be required to prepare site-specific geotechnical investigations to evaluate seismic, liquefaction, ground settlement, paleontological resources, and/or soil expansion hazards. All development projects would be

required to comply with existing federal, State, and local regulations, such as the California Building Code and statewide General Construction Permit. Site-specific development that requires ground-disturbing activities have the potential to uncover paleontological resources. This alternative would continue to result in development throughout the City including Specific Plan area, however, due to the lesser scale of development assumed, the potential to encounter and impact paleontological resources would similarly be lesser when compared to the proposed General Plan.

Impacts to mineral resources under the proposed General Plan are considered significant and unavoidable since portions of the proposed General Plan area overlying important mineral resources could be developed with uses that prevent mineral extraction. While this alternative would result in less overall development, it would still allow development in areas that contain regionally and locally important mineral resources. Therefore, this impact would remain significant and unavoidable.

Overall, impacts concerning geology, soils, and mineral resources would be less than the proposed General but would not reduce any impacts to less than significant.

Greenhouse Gas Emissions

The proposed General Plan without BIG under Horizon Year conditions would not achieve the long-term reduction target of AB 1279 and would conflict with the CARB 2022 Scoping Plan, resulting in significant and unavoidable impacts with respect to GHG emissions. This alternative assumes that a much smaller scale of development would occur within the BIG Specific Plan area and a lesser overall buildout of the 2015 General Plan due to less demand for housing. Therefore, this alternative would result in less GHG emissions when compared to the proposed Project. However, impacts would remain significant and unavoidable.

Hazards, Hazardous Materials, and Wildfire

Under both this alternative and the proposed General Plan, land uses throughout the City would be required to comply with existing federal, State, and local regulations governing use, storage, transport, and disposal of hazardous materials and hazardous wastes. This alternative would not develop the proposed uses of BIG and would therefore minimize the potential hazards associated with developing and operating the proposed facility, as described in the **Section 5.9**. While development of the Specific Plan area under alternative uses would likely require similar remediation activities to those identified for BIG, the lesser scale of development assumed would not necessitate the implementation of the BIG hazard mitigation measures. Therefore, this alternative would result in lesser impacts to hazards and hazardous materials when compared to the proposed General Plan and impacts would remain less than significant.

Hydrology and Water Quality

This alternative would have less hydrology and water quality impacts than the proposed General Plan. Under both plans, future project-specific water quality management plans (WQMPs), preliminary and/or final, would be prepared at the time of future development applications. Moreover, Low Impact Development (LID) and water quality treatment solutions prescribed in project-specific WQMPs would be designed to support or enhance the best management practices (BMPs) and efforts implemented by the City to improve water quality. During construction, project-specific Stormwater Pollution Prevention Plans

(SWPPP) would be required. The SWPPP would describe construction BMPs that address pollutant source reduction and provide measures/controls necessary to mitigate potential pollutant sources.

Overall, less development would occur throughout the City under this alternative resulting in less water quality and hydrology impacts associated with development; impacts would remain less than significant.

Land Use and Planning

This alternative would result in most of the same land use changes as those proposed in the General Plan with the exception of the adoption of the BIG Specific Plan. As proposed, the City would focus housing east of I-15 to protect the 10 million square feet of logistics warehousing, and to help with a more compact urban form. The adoption of the BP Land Use designation and associated zoned district would also move forward to allow complementary development around the warehousing. Like the proposed General Plan, this alternative would not result in division of an existing community and would not conflict with an existing land use plan that mitigates environmental effects. Overall, this alternative would result in similar impacts to the proposed General Plan and impacts would remain less than significant.

Noise and Vibration

Noise impacts associated with BIG would be significant and unavoidable. Impacts would therefore be reduced under this alternative at the BIG Specific Area since the intensity of development in this area would be less and all noise impacts identified are specific to features of BIG. However, the proposed General Plan would also result in significant and unavoidable impacts due to scale of construction activity proposed and increases in roadway traffic noise, and this alternative would also allow development that would result in similar noise impacts. However, because overall development buildout under this alternative would be less than that of the proposed General Plan, impacts would be lesser overall even though individual construction impacts would remain significant and unavoidable. Therefore, this alternative would result in less impacts to noise because of less traffic, and overall development, noise remains significant and unavoidable.

Population and Housing

The proposed General Plan would result in less than significant impacts with respect to population and housing. While the proposed General Plan is anticipated to result in growth in the City beyond that anticipated within the most recent SCAG's regional projections, this growth would not be unplanned and would help to address the City's housing and job needs. This alternative would result in approximately 13,900 fewer jobs and 15,455 fewer housing units. Fewer homes reduce the potential population growth which would result in less commercial and professional office development when compared to the proposed Project. This alternative would create less growth within the City when compared to the proposed Project, therefore resulting in lesser impacts to population and housing than the proposed Project, however both this alternative and the proposed Project would have a less than significant impact on population and housing.

Public Services and Recreation

While neither the proposed General Plan or BIG would result in significant impacts with respect to public services and recreational amenities, this alternative would result in less growth within the City when

compared to the proposed Project. When compared the proposed Project, this alternative would require fewer services and recreation facilities. No significant impacts would occur under both scenarios and no mitigation is required. As is the case with BIG, any development under this alternative would be required to pay fair share development impact fees.

Transportation

The proposed General Plan would result in significant unavoidable impacts with respect to VMT despite an expected decline in VMT per service population by the horizon of the General Plan. This alternative would therefore result in potentially lesser impacts with respect to VMT since overall development would be less when compared to the proposed Project while all General Plan policies incentivizing VMT reductions would still be in effect. While development under this alternative could result in additional industrial development that increases truck travel when compared to development under the proposed General Plan alone, any development replacing that of BIG is unlikely to result in the same scale of employees and operations, resulting less VMT when compared to BIG.

Without BIG, the Hinkley Road crossing of the railroad would not need to be closed and a new bridge over the Mojave River would not be built. Similarly, the roadway improvements to Main Street for BIG would not be needed, although if industrial development occurred on the portions of BIG that are in the City, it is likely that turn lanes or other improvements to Main Street to accommodate truck traffic would be needed. While the proposed Project would result in less significant impacts to transportation plans, roadway hazards, and emergency access, this alternative would result in less change to the roadway network. Construction of any type in the City that could affect roadways would require implementation of a construction traffic control plan that minimizes roadway disruptions.

Tribal Cultural Resources

The proposed General Plan would result in significant and unavoidable impacts with respect to historic resources, which, despite the implementation of **MM CUL-1** and **MM GP CUL-3**, could include impacts to tribal cultural resources as well. Since this alternative would not develop BIG and would result in a lesser level of buildout when compared to the proposed General Plan, it would result in lesser impacts to tribal cultural resources. However, as any development could require form of excavation or land disturbance with the potential to discover tribal cultural resources, like the proposed Project, impacts would remain significant and unavoidable.

Utilities and Service Systems

Since this alternative would result in a reduction of development, less construction of associated utilities and service systems infrastructure connections would be required. Development under this alternative, like the proposed General Plan, would pay fair share development impact fees to expand utilities and service systems, as necessary to serve future development. Overall impacts concerning utilities and service systems under this alternative would be less than the proposed General Plan but would remain significant and unavoidable.

Ability to Meet Proposed General Plan Objectives

As identified in **Table 8-6: No BIG/Proposed General Plan Reduced Development Alternative Ability of Alternative to Meet Project Objectives**, the proposed General Plan with No BIG Alternative would not fulfill any of the proposed General Plan objectives, as identified in **Section 8.1.2**.

Table 8-6: No BIG/Proposed General Plan Reduced Development Alternative Ability of Alternative to Meet Project Objectives	
Objective	Objective Met?
Objective 1. The addition of a substantial number of livable wage jobs that will strengthen the City's economic base and fiscal resiliency and provide career pathways for the community.	Meets Objective to a Lesser Extent. When compared to the proposed General Plan, this alternative would result in 13,900 fewer jobs. This alternative would, nonetheless, result in new jobs in the City when compared to existing conditions, thereby meeting this objective to a lesser extent than the proposed General Plan.
Objective 2. A larger amount and wider range of housing opportunities to address the needs of the community and military installations, demand from new households generated by job growth, and full spectrum of lifestyles and life stages.	Meets Objectives. This alternative would allow the same development in the City under the same land uses as the proposed General Plan, with the exception of the land use changes related to implementing the BIG Specific Plan. These land use changes under the proposed General Plan would only be implemented at the BIG Specific Plan area and do not involve land currently designated or that would be designated for housing. Therefore, while alternative would result in less overall production of housing since less development is anticipated to occur in lieu of BIG, it would not affect where and what kind of housing could be built when compared to the proposed General Plan, since it proposes the same land use plan with respect to residential uses.
Objective 3. A cohesive land use plan that appropriately transitions between residential, commercial, and industrial areas, encourages new development to leverage and improve existing infrastructure, and provides expansion opportunities to support long term growth.	Meets Objective. This alternative proposes the same land use plan as the proposed General Plan with the exception of the land use changes needed to facilitate the development of BIG at the BIG Specific Plan area. Therefore, it would, like the proposed General Plan, provide a cohesive land use plan. While this alternative does not anticipate any annexations of the SOI, it would not prevent future annexations of land in the SOI to support further growth of the City, if needed.
Objective 4. Economic opportunities that allow residents to (re)invest in the community and create generational wealth.	Meets Objective to Lesser Extent. While this alternative would result in an increase of 5,910 jobs when compared to existing jobs in the proposed General Plan area, when compared to the job growth under the proposed General Plan, this alternative would create less economic opportunities since the job growth under BIG would not occur.
Objective 5. Land use and circulation plans that capitalize on Barstow's unique location, as a link on the national supply chain, and existing industrial and rail infrastructure to attract and retain innovative industrial and rail operators and to support the efficient movement of goods.	Meet Objective to Lesser Extent. When compared to the proposed General Plan, which facilitates the development of BIG, this alternative does not intentionally create opportunities to capitalize on Barstow's location to attract new rail operators. This alternative would not include the development of BIG nor the land use changes needed to facilitate a development of its kind. However, it does not prevent innovative industrial and rail operations and is anticipated to result in approximately 10 million square feet of new truck-based warehousing uses. This alternative therefore does not meet this objective to the extent of the proposed General Plan.

Table 8-6: No BIG/Proposed General Plan Reduced Development Alternative Ability of Alternative to Meet Project Objectives	
Objective	Objective Met?
Objective 6. Goals, policies, and implementation strategies that ensure Barstow is a healthy and safe community for residents, businesses, and visitors.	Meets Objective. This alternative would implement the same goals, policies and implementation strategies as the proposed General Plan, with the exception of those related to the implementation of BIG. However, all policies related to health and safety in the community at large would remain the same as the proposed General Plan.

8.10 ALTERNATIVES TO BIG

The following alternatives have been determined to represent a reasonable range of alternatives to BIG, which have the potential to feasibly attain most of BIG’s basic objectives, but which may avoid or substantially lessen any of BIG’s significant effects. The analysis presented below compares the potential environmental impacts associated with the following alternatives to impacts from BIG:

- No BIG/No Annexation Alternative (hereinafter referred to as the “No BIG” Alternative)
- Reduced Intensity Alternative
- BIG West Transload Warehouse Center Alternative

These alternatives were advanced to a conceptual design drawing to confirm if they could meet key BIG objectives. Conceptual designs for these alternatives are presented following each alternative description.

As previously noted, an EIR must identify an “environmentally superior” alternative and where the No Project Alternative is identified as environmentally superior, the EIR is then required to identify as environmentally superior an alternative from among the others evaluated. Each alternative’s environmental impacts are compared to BIG and determined to be environmentally superior, neutral, or inferior. **Section 8.11: Environmentally Superior Alternative** identifies the Environmentally Superior Alternative to BIG. BIG is analyzed in detail in **Section 5.0**.

8.10.1 No BIG/No Annexation Alternative

Description of Alternative

Under State CEQA Guidelines § 15126.6(e), the specific alternative of “no project” shall also be evaluated along with its impact. The purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of approving the project with the impacts of not approving the project. The “no project” analysis is required to discuss the existing conditions (at the time the NOP is published), as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.

Here, BIG proposes development of an identifiable property. Therefore, the “No BIG” Alternative analyzed below is the circumstance under which BIG would not proceed or be approved, annexation to the City of land approximately 2,676 acres within the proposed BIG Specific Plan area that are currently within the County proposed under the proposed General Plan would not occur, but these lands would instead remain subject to the existing CWP land use, and the lands within the proposed BIG Specific Plan area that are

currently within the City (approximately 1,659 acres) would be subject to the proposed General Plan land use. Note, the proposed General Plan would amend the land use designations of approximately 39 acres of General Commercial, 129 acres of Diverse Use, and 45 acres of Flood Control – Open Space within the BIG Specific Plan area to General Industrial. Approximately 1,433 acres within the BIG Specific Plan area would remain designated as General Industrial. Nevertheless, an alternative project without BIG would not preserve the existing environmental conditions within the proposed BIG Specific Plan area, since it would not institute a bar to development of the Specific Plan area pursuant to the CWP and proposed General Plan, as currently permitted under those plans. Therefore, the No BIG Alternative assumes that the BIG Specific Plan area would be developed pursuant to predictable actions by others, to the extent those can be reasonably expected to occur, consistent with available infrastructure and community services, under applicable land use plans, policies, and regulations (i.e., CWP and the proposed General Plan). Under this alternative, BIG's off-site improvements would not be constructed. Given BIG's off-site improvements occur almost entirely within existing rail or roadway ROW, and would not be required under this alternative, these lands would remain in their existing condition.

Table 8-7: No BIG/No Annexation Alternative BIG Area Land Use Designations presents the existing CWP and proposed General Plan land use designations for County and City areas, respectively, that are proposed for inclusion in the BIG Specific Plan area under the proposed Project. As indicated in **Table 8-7: No BIG/No Annexation Alternative BIG Area Land Use Designations**, most of the BIG Specific Plan area under this alternative would be designated for County Rural Living (RL) uses (53 percent) and proposed General Plan General Industrial (GI) uses (38 percent).

Table 8-7: No BIG/No Annexation Alternative BIG Area Land Use Designations			
Land Use Designation	City (Acres)	County (Acres)	Total Percent
County of San Bernardino CWP			
Rural Living (RL)	-	2,270	52%
Resource/Land Management (RLM)	-	210	5%
Public Facility (PF)	-	170	4%
Right-of-Way		26	1%
Total County Specific Plan Area	-	2,676	62%
City of Barstow Proposed General Plan			
General Industrial	1,659	-	38%
Total City Specific Plan Area	1,659	-	38%
Total BIG Specific Plan	4,335		100%
Note: Sums may not total due to rounding			

Table 8-8: No BIG Alternative: Maximum and Assumed Development Capacities estimates the maximum and assumed development capacities for the BIG Specific Plan area based on the existing CWP and proposed General Plan land use designations for County and City areas of the proposed BIG Specific Plan area, respectively, and their respective allowable densities and floor area ratios (FAR). As indicated in the table, the maximum development capacity for the BIG Specific Plan area totals 913 dwelling units and approximately 72.3 million square feet of industrial land uses. Although the development presented in **Table 8-8: No BIG Alternative: Maximum and Assumed Development Capacities** is allowed, it is highly

unlikely that this area would be developed to this maximum allowable capacity within the Horizon Year (2048) based on **Appendix 8.0 BIG-1: Alternative Market Analysis** (“Market Analysis”). The Market Analysis was conducted to evaluate the type and scale of development that would be reasonably likely to occur by 2028 and 2048 under this alternative. The Market Analysis considered the historic growth patterns for the Mojave River Valley and Barstow/Lenwood area market area and the BIG Specific Plan area’s existing roadways and infrastructure, as well as the following factors:

- Review of historic records (see **Appendix 5.9 BIG-1** for historical land uses and development patterns) indicates much of this land has never been developed, indicating little to no market interest in its development.
- Review of existing and proposed zoning for parcels within the BIG footprint.
- Consideration of potential development constraints (utilities, roadway access and street improvements).
- Most of the lands within the BIG footprint are within the City’s SOI, as defined in **Section 3: Project Description**. CWP EIR Table 3-3 states “No growth is projected in the North Desert region area...of Barstow Sphere of Influence” through its horizon year of 2040. Therefore, the CWP recognized the area as having low potential for growth through 2040. As of the NOP for this EIR, almost none of the forecasted development within the 2015 General Plan has occurred, indicating overall low market interest in this area. Additionally, minimal County or City development applications or anticipated projects have been proposed in the vicinity of the BIG Specific Plan area, further indicating low market interest in the area’s development (County 2024); see **Section 6.0: Cumulative Impacts**. The EV Charging and Logistics Facility, a proposed project located immediately east of subarea 1, is proposed by a private developer in County lands and, given the previous lack of development in the area, County residential zoning, and amount of infrastructure improvements required for industrial development in this area (see **Appendix 8.0 BIG-1**), this project is not anticipated to signal a significant reversal in the trend of development in this area absent the proposed General Plan, which would zone adjacent City parcels to industrial and thus be more likely to be developed as industrial land uses.

The Market Analysis estimated the new development that is likely to occur in the BIG Specific Plan area. The Market Analysis found that development of approximately 12 to 15 dwelling units and approximately 300,000 to 650,000 square feet of industrial uses would be reasonably likely to occur within the BIG Specific Plan area by 2048. Therefore, this alternative conservatively assumes development of approximately two percent of the maximum residential development capacity and approximately one percent of the maximum industrial development capacity specified in **Table 8-8: No BIG Alternative: Maximum and Assumed Development Capacities**.

Table 8-8: No BIG Alternative: Maximum and Assumed Development Capacities

Land Use Designations	BIG Specific Plan Area (AC) ¹	Allowable Density/ Intensity ²	Maximum Development Capacity		Estimated Development ⁵	
			Residential (DU) ³	Industrial (SF) ⁴	Residential (DU)	Industrial (SF)
County of San Bernardino CWP						
Rural Living (RL)	2,270	0.4 DU/AC	908	0	12 to 15	0
Resource/Land Management (RLM)	210	0.025 DU/AC	5	0		
Public Facility (PF)	170	--	0	0	0	0
Right-of-Way (i.e., unzoned)	26					
Subtotal County	2,676	--	913	0	15	0
City of Barstow Proposed General Plan						
General Industrial	1,659	1.0 Floor Area Ratio	0	72,257,040	0	300,000 to 650,000
Subtotal City	1,659	--	0	72,257,040	0	650,000
TOTAL	4,998	--	913	72,257,040	15	650,000
% of Maximum Dev. Capacity	--	--	100%	100%	1.6%	0.9%
Note: ¹ AC = acres ² Density applies to residential uses and commonly pertains to dwelling units per acre (DU/AC) and intensity applies to non-residential uses and commonly pertains to floor area ratio (FAR). FAR is determined by dividing the total area of the building by the total area of the property. County densities/intensities are pursuant to the CWP Land Use Element, and City densities/intensities are pursuant to the proposed General Plan Land Use Element. ³ DU = dwelling units ⁴ SF = square feet ⁵ Appendix 8.0 BIG-1						

Table 8-9: No BIG Alternative Compared to BIG compares development under this alternative to development under BIG. As indicated in the table, this alternative anticipates 15 dwelling units, whereas BIG proposes none and this alternative anticipates approximately 650,000 square feet of industrial uses, whereas BIG proposes a rail yard and 9,150,000 million square feet of industrial uses (including approximately 134,000 square feet of support buildings and structures at BIG's intermodal facility and approximately 9.0 million square feet of transload warehouse center); see **Section 3.0: Project Description**. Comparatively, this alternative involves approximately 93 percent less industrial square footage than BIG. The Market Analysis does not provide information regarding the location of potential development under this alternative; however, it is assumed that this alternative's development footprint would be significantly less than the BIG Specific Plan area given this alternative proposes 15 dwelling units but approximately 93 percent less industrial square feet.

Table 8-9: No BIG Alternative Compared to BIG		
Description of Land Uses	Residential Uses (DU)	Industrial (SF)
BIG		
Transload Warehouse Center	--	9,000,000
Rail Yard Buildings & Structures	--	150,000
BIG Total	--	+9,150,000
NO BIG ALTERNATIVE		
New Residential	15	--
New Industrial	--	650,000
No BIG Alternative Total	15	650,000
Difference between No BIG Alternative and BIG	+15	-8,500,000 -93%
Note: DU = dwelling units; SF = square feet.		

Impact Comparison to BIG

An evaluation of the potential environmental impacts of the No BIG Alternative, as compared to those of BIG, is provided below.

Aesthetics

Anticipated development under this alternative would occur in accordance with the County Code and Barstow Code development standards concerning building height, setbacks, massing, lighting, landscaping, and other design components which affect the area's visual character, rather than the BIG Specific Plan's development standards. This alternative assumes development of approximately 15 more dwelling units and approximately 93 percent less industrial square footage than would occur under BIG. Under this alternative, the degree of visual alteration to undeveloped lands within the BIG Specific Plan area would be less than BIG since development under this alternative would occur at a lower intensity and within a smaller footprint than BIG. Therefore, under this alternative, views along the 3-mile segment of Main Street which is designated as a National Scenic Byway would be altered, although to a lesser degree than BIG and would still substantially damage views of scenic resources within a State scenic highway, resulting in a significant and unavoidable impact. Under this alternative, the visual character and

quality of the BIG Specific Plan area would be altered less than BIG. However, under this alternative, replacement of the desert landscape along the western portion of Main Street would still occur and the overall visual character would still be permanently altered. As such, impacts under this alternative would remain significant and unavoidable like BIG.

Like BIG, development under this alternative would introduce new sources of light and glare in a generally rural, undeveloped area. Although development under this alternative would likely not include a solar farm or operational lighting and signage similar to BIG, development under this alternative would still result in a significant increase in sources of light and glare in the area. As such, light and glare impacts under this alternative would be less than BIG, but would remain significant and unavoidable.

Overall impacts regarding aesthetics under the No BIG Alternative would be less than BIG's since development would occur at a lower intensity. However, impacts would remain significant and unavoidable.

Agriculture and Forestry

Of the 3,855 acres of vacant lands within the BIG footprint, approximately 313 acres are designated Important Farmland. Under this alternative, Important Farmland would not be converted to non-agricultural uses because they would remain undeveloped, whereas approximately 313 acres would be converted under BIG, as determined in **Section 5.2: Agriculture and Forestry Resources**. Therefore, no impacts would occur under this alternative.

Approximately 608 acres of vacant land within the BIG footprint are County-zoned for agricultural uses; see **Table 8-1: Comparison of Rejected Alternatives to Project Objectives – Proposed General Plan**. Under the proposed General Plan, 598 acres within the BIG Specific Plan area would be rezoned to BIG Specific Plan. Under this alternative, these lands would remain zoned for agricultural uses thus, no conflict would occur, unlike BIG, which would result in a significant unavoidable impact due to the proposed General Plan's rezoning of these lands to BIG Specific Plan. Further, since anticipated development under this alternative would be consistent with the County's existing zoning, and construction would likely occur over a long period of time, it is unlikely that development under this alternative would result in the conversion of Important Farmland due to construction of the alternative, incompatibility of uses, or other changes in the existing environment. Therefore, unlike BIG, no impact would occur under this alternative.

Overall impacts concerning agricultural and forestry resources under this alternative would be less than BIG since the conversion of Important Farmland to a non-agricultural use would not occur.

Air Quality

Under this alternative, it is anticipated that approximately 15 dwelling units and approximately 93 percent less industrial square feet would be constructed, as compared to BIG. Therefore, construction air quality impacts would be proportionately less under this alternative as compared to BIG. Individual developments under this alternative may not exceed the MDAQMD threshold, and thus, may not be required to incorporate any mitigation measures. Under this alternative, construction impacts would be less than significant.

Like BIG, anticipated development under this alternative would result in an overall increase in development in the area, compared to existing conditions. Unlike BIG, which would focus largely on container transport by rail and electric hostler, the new industrial uses predicted to be developed under this alternative would likely be traditional trucking-intensive uses, which could result in corresponding local air quality impacts. **Table 8-10: 2048 Unmitigated Operational Emissions Comparison Between No BIG Alternative and BIG1** summarizes unmitigated operational emissions for the No BIG Alternative. As identified in the table, this alternative would result in approximately 92 percent less emissions than BIG, given this alternative proposed approximately 93 percent less development, and would not exceed MDAQMD thresholds. Each cumulative project would require separate development review by the City, which would verify compliance with the City's policies regarding lessening air quality impacts and identify necessary mitigation measures, where appropriate. Therefore, under this alternative, operational impacts would be less than significant with mitigation incorporated. Like BIG, this alternative would also result in less than significant impacts regarding odors.

Table 8-10: 2048 Unmitigated Operational Emissions Comparison Between No BIG Alternative and BIG¹						
Source	VOC	ROG	NO_x	CO	PM₁₀	PM_{2.5}
MAXIMUM POUNDS PER DAY						
BIG	422.07	2,198.12	3,595.47	8.06	387.19	118.41
No BIG Alternative	35.16	17.39	82.59	0.27	18.84	8.11
MDAQMD Threshold	137	137	548	137	82	65
No BIG Alternative Exceeds Threshold?	No	No	No	No	No	No
No BIG Alternative Compared to BIG	-386.91	-2180.73	-3512.88	-7.79	-368.35	-110.3
No BIG Alternative Compared to BIG Percent Difference	-92%	-99%	-98%	-97%	-95%	-93%
TONS PER YEAR						
BIG	63.09	338.89	587.39	1.37	68.05	19.22
No BIG Alternative	2.88	2.94	8.66	0.04	2.85	0.91
MDAQMD Threshold	25	25	100	25	15	12
No BIG Alternative Exceeds Threshold?	No	No	No	No	No	No
No BIG Alternative Compared to BIG	-60.21	-335.95	-578.73	-1.33	-65.2	-18.31
No BIG Alternative Compared to BIG Percent Difference	-95%	-99%	-99%	-97%	-96%	-95%
Note: ¹ Modeling assumes 300,000 square feet of industrial uses (i.e., warehouse) and 15 single-family residential dwelling units. A total of 513 daily trips were assumed for the industrial uses (based on ITE Code 150), which includes 180 truck trips (21.9 percent 4+axle, 7.3 percent 3-axle, and 5.9 percent 2-axle trucks). A total of 141 daily trips were assumed for single-family residential.						

Overall, impacts concerning air quality under this alternative would be less than BIG, given that less construction and operations emissions would occur. Impacts would be less than significant.

Biological Resources

Anticipated development under this alternative would occur within significantly less land area, therefore, impacts under this alternative would be less than under BIG. However, development would still occur

throughout the BIG Specific Plan area, like BIG, this alternative would impact species identified as a candidate, sensitive or special status species. This alternative would likely include similar mitigation identified in **Section 5.4**, thus impacts under this alternative would be reduced to a less than significant level.

This alternative would also be expected to result in substantial adverse effects to sensitive natural communities and wetlands, like BIG. With incorporation of similar mitigation to BIG (acquiring mitigation credits through associated agency permitting processes), impacts under this alternative would be less than significant. Further, development of this alternative would occur within significantly less land area, therefore, impacts under this alternative would be less than under BIG.

Like BIG, this alternative would interfere substantially with the movement of wildlife species through established wildlife corridors and the movement of local wildlife within the footprint. Mitigation for future development may be more challenging under this alternative, as it would require coordinating a “patchwork” of movement through multiple private developments that do not share ownership, rather than BIG, where the wildlife movement corridors can be planned through a single project site. Potential mitigation for this impact would depend on exact locations and site plans of future development, however, given development of this alternative would occur within significantly less land area, impacts under this alternative would be less than under BIG.

Overall, impacts concerning biological resources under the No BIG Alternative would be less than BIG’s, given this alternative would occur within significantly less land area.

Cultural Resources

Like BIG, anticipated construction under this alternative would occur within the BIG Specific Plan area which contains documented historical and archeological resources eligible for listing in the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR). However, construction would only occur within a significantly smaller area, thus, only historical and archaeological resources identified as eligible or listed resources within these portions of the BIG Specific Plan area would potentially be significantly impacted during ground disturbance of this alternative. However, like BIG, significant and unavoidable impacts to historic and archaeological resources would still occur. Like BIG, incorporation of mitigation which requires preservation in place and the implementation of data recovery would reduce impacts to historical and archaeological resources to less than significant. Further, given the lower intensity and incremental development under this alternative, individual developments could potentially avoid specific resources through design and mitigation measures. Therefore, overall, under this alternative, substantial adverse changes in the significance of historical and archaeological resources would be less than would occur under of BIG, but would remain significant and unavoidable despite incorporation of mitigation.

Like BIG, construction under this alternative would be anticipated to occur within the BIG Specific Plan area which is considered sensitive for human remains given presence of archaeological sites and isolated resources that contain them. Construction of this alternative would also include ground-disturbing activities which could disturb human remains. However, like BIG, compliance with established regulatory framework would reduce impacts to less than significant.

Overall, impacts concerning cultural resources under the No BIG Alternative would be less than BIG's, given this alternative would occur within significantly less land area. However, impacts would remain significant and unavoidable.

Energy

Under this alternative, land located within the BIG Specific Plan area would be developed with uses that are currently allowed under the CWP and proposed General Plan. Overall, impacts concerning energy resources under the No BIG Alternative would be less than BIG's, given this alternative would result in less buildout. However, although this alternative would result in approximately 93 percent less industrial square feet than BIG, new development would be less energy efficient than BIG as these buildings would typically not achieve the energy efficiency standards BIG would comply with per mitigation identified in **Section 5.6: Energy**. Moreover, unlike BIG construction, under this alternative, new building construction would not foreseeably include project-specific construction energy efficiency measures and therefore would conservatively be considered inefficient. Therefore, it is conservatively assumed that impacts would be significant and unavoidable and greater than energy impacts associated with BIG.

Geology, Soils, and Mineral Resources

Like BIG, anticipated development under this alternative would be required to follow and conform to the then current California Building Code and City and County standards concerning seismic, geologic, and soils hazards, resulting in a less than significant impact. Therefore, like BIG, development under this alternative would result in less than significant impacts.

Unlike BIG, projects anticipated to occur under this alternative would be incrementally developed, and therefore it is assumed that septic or alternative wastewater disposal systems would be proposed since existing City wastewater service connections are not easily accessible, especially for proposed residential uses. Given most of the land uses in the area use septic, however, it is assumed that soils can accommodate septic systems.

Under this alternative, ground disturbance and development within the BIG Specific Plan area would still occur. Like BIG, construction within the eastern extent of the BIG Specific Plan area, which could potentially contain paleontological resources, could still occur. However, given the lower intensity and incremental development under this alternative, individual developments could potentially avoid specific resources through design and mitigation measures. Further, development under this alternative would incorporate similar mitigation measures which require paleontological monitoring during construction. Therefore, like BIG, development under this alternative would result in less than significant impacts with incorporation of mitigation regarding paleontological resources.

The BIG Specific Plan area contains mineral deposits where significant inferred resources are present and/or known mineral deposits that may qualify as mineral resources, thus, development under this alternative could also result in the loss of availability of a known mineral resource that may be of economic value to the region and the State's residents. However, mining of these mineral resources is extremely unlikely given it is almost entirely within the Mojave River. Therefore, like BIG, impacts from development of this alternative would be less than significant impact.

Impacts concerning geology, soils, and mineral resources under the No BIG Alternative would be similar to BIG's impacts.

Greenhouse Gas Emissions

Under this alternative, land located within the BIG Specific Plan area would be developed with uses that are currently allowed under the CWP and proposed General Plan. Although this alternative would result in approximately 93 percent less industrial square feet than BIG, the industrial uses anticipated to be proposed under this alternative would be traditional industrial uses, which are trucking-intensive and result in corresponding local air quality impacts, whereas BIG proposes a closed loop where containers are offloaded at the rail yard, taken by electric hostler to the transload warehouse center, transloaded, then taken by electric hostler back to the rail yard to be loaded onto a train and taken eastward. Under this alternative, approximately 650,000 square feet of traditional industrial uses would be developed, which are trucking-intensive uses which could result in corresponding GHG impacts from increased truck trips and VMT. Whereas BIG would reduce truck trips, resulting in reduced GHG emissions by enhancing rail transport efficiency, and would overall reduce greenhouse gas emissions. Further, through incorporation of mitigation detailed in **Section 5.3: Air Quality** and **Section 5.6: Energy**, BIG would result in net reduced GHG emissions. As identified in **Table 8-11: 2048 Unmitigated Operational Emissions Comparison Between No Project Alternative and BIG¹**, emissions under this alternative would result in approximately 171 percent greater GHG emissions than BIG since it is assumed that individual developments would be trucking intensive. Further, individual developments under this alternative may not exceed the MDAQMD threshold and may not be required to incorporate any mitigation measures or implement the GHG reduction measures that BIG would. Nevertheless, impacts under this alternative would be less than significant given emissions would also be under the MDAQMD threshold.

Table 8-11: 2048 Unmitigated Operational Emissions Comparison Between No Project Alternative and BIG¹		
Scenario	CO₂e	
	Metric Tons per Year	Short Tons per Year
BIG	-6,632	-7,310
No BIG Alternative	4,690	5,170
MDAQMD Threshold	NA	100,000
Threshold Exceeded?	NA	No
Difference between BIG and No BIG Alternative	11,322	12,479
Percent Difference	+171%	+171%
Notes: ¹ Modeling assumes 300,000 square feet of industrial uses (i.e., warehouse) and 15 single-family residential dwelling units. A total of 513 daily trips were assumed for the industrial uses (based on ITE Code 150), which includes 180 truck trips (21.9 percent 4+axle, 7.3 percent 3-axle, and 5.9 percent 2-axle trucks). A total of 141 daily trips were assumed for single-family residential.		

Additionally, it is assumed that like BIG, development under this alternative would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs and impacts would be less than significant.

Overall, although impacts would remain less than significant, impacts concerning GHG emissions under the No BIG Alternative would be greater than BIG's since development under this alternative would result in greater GHG emissions from increased truck trips, whereas BIG would reduce truck trips and enhance rail transport efficiency.

Hazards, Hazardous Materials, and Wildfire

Under this alternative, land within the BIG Specific Plan area would be developed with land uses that are currently allowed under the CWP and proposed General Plan. Although development under this alternative would still increase land uses within the BIG Specific Plan area and transport of hazardous materials would occur, such uses would not foreseeably include a large amount of freight rail that could potentially include the transport of hazardous materials. Since development under this alternative would not result in a similar scale of transported hazardous materials, development under this alternative would result in a less than significant impact regarding the routine transport, use or disposal of hazardous materials, unlike BIG.

Like BIG, this alternative also assumes demolition of existing land uses, therefore, foreseeable upset and accident conditions involving the release of hazardous materials into the environment would still occur for development within properties classified as RECs as listed in **Section 5.9**. Like BIG, through compliance with existing regulatory framework, impacts under this alternative would be less than significant.

Like BIG, construction and operational activities under this alternative could emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing school. However, these activities would be subject to compliance with federal, State, and local regulations, thus, would result in a less than significant impact. Furthermore, construction and operational activities under this alternative would be less than under BIG, therefore, impacts would be less than BIG.

Like BIG, development under this alternative would not be located on a site included in a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 (i.e., the Cortese list), in or near lands classified as a very high fire hazards severity zone, or near a public airport, and no impact would occur in this regard.

Overall, impacts concerning hazards, hazardous materials, and wildfire under the No BIG Alternative would be less than BIG's given less hazardous materials would be transported under this alternative.

Hydrology and Water Quality

Like BIG, each development under this alternative would be required to comply with the established regulatory framework to mitigate potential impacts concerning water quality during construction and operations. Additionally, this alternative would not include operation of a large rail yard, which are known to generate significant amounts of heavy metals and water pollutants. While these pollutants would be intercepted and treated by BMPs under BIG, they would be avoided under this alternative. Further, this alternative proposes approximately 93 percent less industrial square footage than BIG, thus, would result in less stormwater runoff and interference with groundwater recharge given less impervious surface than BIG. While future development could include use of septic, this would be subject to State approval, which

requires compliance with standard provisions to prevent impacts to water quality related to septic usage. As such, impacts under this alternative would be less than BIG.

Overall, impacts concerning hydrology and water quality under this alternative would be less than BIG's, given fewer industrial uses and no rail uses would be developed under this alternative. Additionally, there would be less impervious surface under this alternative. Impacts are anticipated to be less than significant, following compliance with regulatory requirements regarding hydrology and water quality.

Land Use and Planning

Under this alternative, development would occur consistent with the existing County and City land use designations and would be subject to compliance with applicable CWP and City proposed General Plan policies. Environmental impacts from individual developments would be analyzed independently and would likely be smaller in scale when compared individually to BIG. Therefore, like BIG, development under this alternative would occur in compliance with 2015 General Plan land use designations and applicable Barstow Code development standards and would result in less than significant impacts.

Overall, impacts concerning land use and planning under the No BIG Alternative would be similar to BIG's given development would occur consistent with the CWP and proposed General Plan.

Noise and Vibration

Since development under this alternative is anticipated to result in approximately 93 percent less industrial square feet than BIG, and construction would occur incrementally, impacts from construction noise would be less than BIG, but could still exceed thresholds depending on location, proximity to sensitive receptors, phasing, equipment types, schedule, and other variables that are currently unknowable. Therefore, daytime construction noise levels under this alternative could still be significant and unavoidable. Unlike BIG, which would require nighttime construction to facilitate connections to the existing mainline, this alternative is not anticipated to require nighttime construction given no rail connections are anticipated and construction of this alternative is anticipated to occur between 7 a.m. and 7 p.m. from Monday to Saturday. Therefore, BIG's significant and unavoidable impacts concerning nighttime construction noise would be avoided under this alternative. Further, operations under this alternative would result in less of an increase in ambient noise levels than under BIG.

Since development under this alternative would involve approximately 93 percent less industrial square feet than BIG, and construction would be proportionately less, construction would result in less generation of groundborne vibration or groundborne noise than BIG.

Overall, impacts concerning noise under this alternative would be less than BIG's, given BIG's significant and unavoidable impacts from nighttime construction would be avoided and proportionately less construction and operations would occur.

Population and Housing

This alternative proposes development of approximately 15 additional dwelling units, which would generate a direct population growth of approximately 47 persons.⁴ Like BIG, direct population growth through employment generating land uses is not anticipated, as it is likely the jobs generated under this alternative would be filled by currently unemployed persons within the City and surrounding areas. Under this alternative, development would occur pursuant to the CWP and proposed General Plan land use designations. As these uses would have been anticipated in the respective County CWP and proposed General Plan, population growth under this alternative would not be unplanned and therefore, would not result in significant impacts concerning population and housing. Further, under this alternative, the intensity of uses anticipated under the CWP and proposed General Plan would be constructed at only approximately two percent of the maximum residential and industrial development capacity, and therefore this alternative would result in proportionately less impacts regarding population and housing than planned for in the CWP and proposed General Plan. As such, like BIG, impacts related to population and housing under this alternative would be less than significant.

Overall, impacts concerning population and housing under this alternative would be less than BIG, given population growth would occur consistent with the CWP and proposed General Plan.

Public Services and Recreation

Under this alternative, land within the BIG Specific Plan area would be developed pursuant to CWP (for lands within the County) and proposed General Plan (for lands within the City) land use designations. Any new land uses anticipated to be approved under this alternative would have been planned for in the CWP and proposed General Plan, which both have mechanisms in place for individual developments within the BIG Specific Plan area to pay fair share development impact fees to expand services, as necessary. Further, under this alternative, the intensity of uses anticipated under the CWP and proposed General Plan would be constructed at only approximately two percent of the maximum development capacity, and therefore development of this alternative would result in proportionately less impacts regarding public services and recreation than originally anticipated in the CWP and proposed General Plan. As such, like BIG, development under this alternative would not result in the need for new or physically altered fire or police protection facilities, school facilities, library facilities, or park facilities. Therefore, the environmental impacts from construction of such facilities would not occur and impacts would be less than significant. As is the case with BIG, any development under this alternative would be required to pay fair share development impact fees.

Overall, impacts concerning public services and recreation under the No BIG Alternative would be less than BIG, given development would occur consistent with the CWP and proposed General Plan.

⁴ Based on 3.15 persons per household for County lands and 2.8 persons per household for City land (California Department of Finance (DOF). 2023. Table 1: E-5 City/County Population and Housing Estimates; and Table 2: E-5 City/County Population and Housing Estimates; see Section 5.13: Population and Housing)

Transportation

Under this alternative, anticipated development would be consistent with the CWP and proposed General Plan circulation elements. Therefore, development under this alternative would not conflict with a program plan, ordinance, or policy addressing the circulation system and proposes improvements to the circulation system minimize effects to the transit system and impacts would be less than significant.

Under this alternative, the anticipated development would result in a net increase in automobile VMT over baseline conditions. However, since development under this alternative is anticipated to occur at only approximately two percent of the maximum development capacity, the increase in automobile VMT under this alternative would result in a less than significant impact, although BIG would result in a net decrease of VMT.

Overall, impacts concerning transportation under the No BIG Alternative would be less than BIG's, and development would be consistent with the CWP and the proposed General Plan and would also generate less VMT.

Tribal Cultural Resources

Like BIG, anticipated construction under this alternative would occur within the BIG Specific Plan area which contains documented prehistoric cultural resources, which include 19 resources that are recommended eligible for listing in the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR). However, construction would only occur within a significantly smaller area, thus, only prehistoric cultural resources identified as eligible or listed resources within these portions of the BIG Specific Plan area would potentially be significantly impacted during ground disturbance of this alternative. Given the lower intensity and incremental development under this alternative, individual developments could potentially avoid specific resources through design and mitigation measures. However, like BIG, significant and unavoidable impacts to prehistoric cultural resources could still occur despite incorporation of mitigation identified in **Section 5.5: Cultural Resources**. Therefore, overall, under this alternative, substantial adverse changes in the significance of prehistoric cultural resources would be less than would occur under BIG but would remain significant and unavoidable despite incorporation of mitigation.

Overall, impacts concerning tribal cultural resources under the No BIG Alternative would be less than BIG's, given this alternative would occur within significantly less land area. However, impacts would remain significant and unavoidable.

Utilities and Service Systems

Under this alternative, land within the BIG Specific Plan area would be developed pursuant to the CWP and proposed General Plan land use designations. Land uses anticipated to be proposed under this alternative have been planned for in the CWP and City proposed General Plan, which both provide the basis for utility plans. Further, under this alternative, the intensity of uses anticipated under the CWP and proposed General Plan would be constructed at only approximately two percent of the maximum development capacity, and therefore development of this alternative would result in proportionately less impacts regarding utilities and service systems than originally anticipated in the CWP and proposed

General Plan. Additionally, the CWP and proposed General Plan, both have mechanisms in place for individual developments to pay fair share development impact fees to expand utilities and service systems, as necessary. As such, like BIG, development under this alternative would be required to pay fair share development impact fees. Therefore, unlike BIG which requires incorporation of mitigation, impacts under this alternative would be less than significant without mitigation incorporated.

Overall impacts concerning utilities and service systems under the No BIG Alternative would be similar to BIG, given population growth would occur consistent with the CWP and proposed General Plan.

Ability to Meet Project Objectives for BIG

As shown below in **Table 8-12: No BIG Alternative Ability to Meet Project Objectives**, the No BIG Alternative would not fulfill any of BIG's Project objectives.

Table 8-12: No BIG Alternative Ability to Meet Project Objectives	
Objective	Objective Met?
Increase the speed and reliability, and lower the cost, of moving containerized goods from the San Pedro Bay Ports ("Ports") to their end destinations, with the end effect of reducing traffic congestion and associated air emissions from trucking of goods to and from transload facilities, by constructing and operating a freight rail facility that comprises: • an intermodal freight rail yard (IMF) with a "closed loop" connection to an on-site transload warehouse center of sufficient capacity to attract large-scale users of warehouse facilities and justify their adoption of rail transport instead of long-distance, heavy-duty truck transport, and • a block swap yard at the same site as the IMF, to enable blocks of rail cars with the same destination to be combined into a single train, thereby increasing the efficiency of goods movement by rail;	No. This alternative would not construct any of the components listed in this objective.
Optimize symbiotic facility site design that allows the most efficient interplay between the operations of the block swap, IMF and transload warehouse center to ensure that the site will accommodate projected future demand.	No. This alternative would not construct a block swap, IMF and transload warehouse center.
Construct and operate the facility in a manner that promotes the public policy goals in the State Rail Plan to reduce the disproportionate impacts of truck-borne goods movement in urbanized and densely populated areas adjacent to Port facilities in southern California.	No. This alternative would not include an international gateway facility that promotes the public policy goals in the State Rail Plan.
Utilize a single technology platform to track goods throughout their journey from the Ports through the facility to their end destinations, thereby maintaining	No. This alternative would not include an international gateway facility.

Table 8-12: No BIG Alternative Ability to Meet Project Objectives

Objective	Objective Met?
greater control, awareness, and visibility of goods movement through the supply chain;	
Design the facility so that its construction and operations do not interfere with or cause delays to existing operations on the mainlines.	No. This alternative would not include an international gateway facility.
Locate the facility at a site that would:	
be large enough for all BIG components (i.e., intermodal facility, transload warehouse center, block swap yard, additional laydown area, and additional tracks along BNSF's existing mainline);	No. This alternative would not include an international gateway facility.
be positioned along BNSF's existing mainline and near where the Cajon, Mojave, and Needles Subdivision mainlines converge (i.e., the "Subdivision Wye");	No. This alternative would not include an international gateway facility.
be positioned near an existing locomotive maintenance facility, or with sufficient space for a new locomotive maintenance facility;	No. This alternative would not include an international gateway facility.
be positioned a reasonable distance from heavily urbanized areas (where land use incompatibilities can be minimized) yet near an existing employment base, freeways, and essential infrastructure;	No. This alternative would not include an international gateway facility.
be relatively level and largely devoid of existing land uses and sensitive biological resources;	No. This alternative would not include an international gateway facility.
allow for sufficient on-site power generation to the rail yard (i.e., solar farm).	Yes, but to a lesser degree. While on-site power generation could occur under this alternative, there are no proposals for on-site power generation from other applicants, thus, is uncertain.

8.10.2 Reduced Intensity Alternative

The "Reduced Intensity" Alternative assumes development similar to BIG. However, under this alternative, the rail yard and transload warehouse center's development intensity and footprint would be reduced by approximately 50 percent, as compared to BIG. As outlined in **Table 8-13: Reduced Intensity Alternative Compared to BIG**, the transload warehouse center under this alternative would be reduced to approximately 4.5 million square feet within 665 acres (from 9 million square feet within 1,330 acres under BIG) and the rail yard would be reduced to 975 acres (from 1,950 acres under BIG). Under this alternative, transload warehouse center development would be concentrated at the western end of the BIG footprint, as shown on **Figure 8-6: Reduced Intensity Alternative**. The area east of Lenwood Channel would not be redesignated to BIG Specific Plan, but would instead retain the existing land use designations, and is assumed to not be developed within the Horizon Year (2048). The solar farm would remain unchanged under this alternative. Additionally, BIG's proposed off-site improvements would

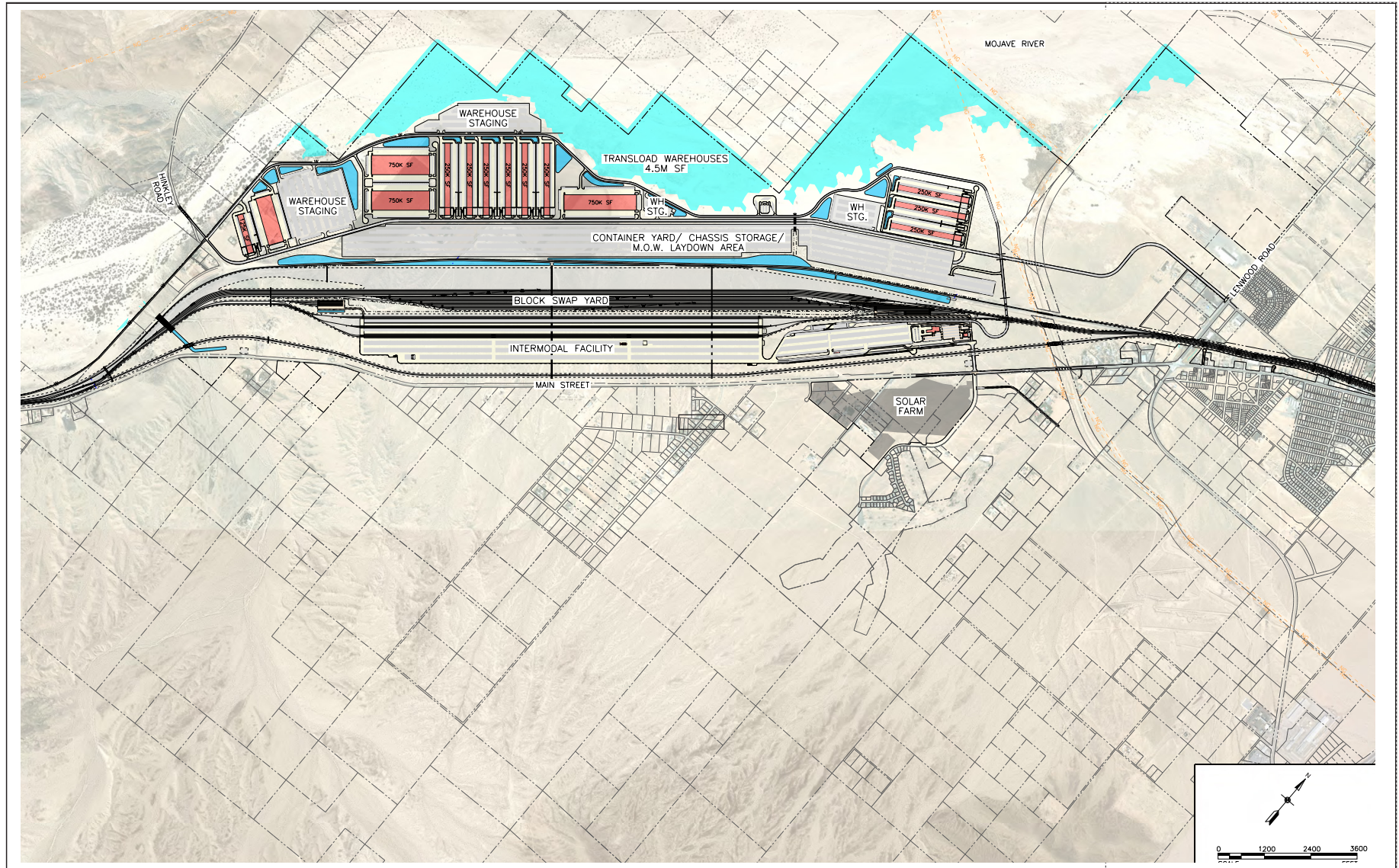
remain unchanged under this alternative, except the following, which would be proportionately reduced under this alternative:

- Stormwater improvements, given the reduced impervious surfaces;
- Circulation/roadway improvements such as signaling intersections, given the proportionate decrease in heavy-duty truck and passenger vehicle trips.

Table 8-13: Reduced Intensity Alternative Compared to BIG

Description	Transload Warehouse Center (MSF) ¹	Transload Warehouse Center (AC) ^{2,3}	Rail Yard (AC) ²	Earthwork (MCY) ⁴
Reduced Intensity Alternative	4.5	665	975	22
BIG	9.0	1,330	1,950	26
Total Difference	-4.5	-665	-970	-4
Percent Difference	-50%	-50%	-50%	-15%
Note: ¹ SF = square feet; MSF = million square feet. ² AC = acres. ³ This total excludes the approximately 595 acres within the Mojave River Conservation Easement area. ⁴ MCY = million cubic yards.				

Under this alternative, like BIG, grading would need to occur throughout the rail yard area, requiring excess soil to be moved to the transload warehouse center. Based on the conceptual site plan for this alternative, earthwork is estimated to total approximately 22 million cubic yards (MCY), or approximately 15 percent less than BIG's estimated 26 MCY. Therefore, construction activities for the rail yard and transload warehouse center would be proportionately less under this alternative compared to BIG.



Source:
Transystems, 2025

Figure 8-6
Reduced Intensity Alternative

Operations under this alternative would involve proportionately fewer heavy-duty truck and vehicle trips, given the decreased intermodal facility and transload warehouse center capacity under this alternative. Utility demand and generation would be proportionately less than BIG, as this alternative would involve proportionately fewer operations and employees. Cross-dock intermodal operations consisting of transloading international container cargo into domestic containers would also occur under this alternative, but would be proportionately less. Therefore, vehicle miles traveled (VMT) under this alternative would be proportionately less than under BIG. Similarly, the reduction in existing regional VMT achieved by BIG would be proportionately less under this alternative. Train volumes and related rail yard equipment (cranes, electric hostlers, etc.) activity would be proportionately less under this alternative given reduced rail yard operations.

Aesthetics

Under this alternative, a rail yard and transload warehouse center would still be constructed, replacing the existing land uses and desert landscape with an industrial use and associated improvements. Therefore, like BIG, this alternative would result in a significant unavoidable impact, although to a lesser degree, to scenic resources within a State scenic highway and to the visual character and quality of public views of the site and its surroundings. Additionally, this alternative would still operate 24 hours per day, 365 days per year and while proportionately fewer cross-dock intermodal operations would occur, light and glare would still occur where it was previously absent. Therefore, while this alternative would result in less light and glare than BIG, operations under this alternative would still create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area, resulting in a significant unavoidable impact.

Overall, the Reduced Intensity alternative would result in less impact than BIG concerning aesthetics given this alternative proposes less industrial development and activities, thus, proportionately less visual alteration than BIG. However, like BIG, impacts under this alternative would be significant and unavoidable, despite incorporation of mitigation.

Agriculture and Forestry Resources

Like BIG, this alternative would convert approximately 5 acres of Important Farmland to non-agricultural use. However, based on the Land Evaluation and Site Assessment this conversion would be less than significant (see **Appendix 5.2 BIG-1**). Like BIG, this alternative would not conflict with zoning for agricultural use and would result in a less than significant impact, as the BIG Specific Plan area would be rezoned to BIG Specific Plan under the proposed General Plan. Further, like BIG, this alternative would involve other changes in the environment, such as utility disruption and loss of access, which could indirectly convert Important Farmland to a non-agricultural use. However, these impacts would also be temporary.

Overall, impacts concerning agricultural and forestry resources under the Reduced Intensity Alternative would be similar to BIG's, given development would occur where agriculture resources are present.

Air Quality

BIG's operational air quality emissions would occur also with the Reduced Intensity Alternative, however, to a lesser degree given 50 percent less development. Although this would result in lower pollutant emissions than BIG, this alternative would still exceed MDAQMD thresholds for air pollutant emissions during construction and operations. Even with mitigation incorporated similar to BIG, this alternative would still exceed MDAQMD thresholds for VOC, NOx, CO, PM₁₀, and PM_{2.5}, although, to a lesser degree than BIG, and would conflict with the MDAQMD's AQMP. Additionally, construction and operations under this alternative would still result in a cumulatively considerable net increase of criteria pollutants despite incorporation of similar mitigation for which the MDAQMD is in nonattainment, however, to a lesser degree given 50 percent less development.

As this alternative proposes the transload warehouse center at the western portion of the BIG footprint, fewer sensitive receptors would be exposed to pollutants, when compared to BIG. However, construction and operations would still result in a cumulatively considerable impact related to TACs and health risk, however, to a lesser degree than BIG. Additionally, this alternative would result in less than significant impacts regarding odors, similar to BIG.

Overall, impacts concerning air quality under the Reduced Intensity Alternative would be less than BIG's, given this alternative proposes half the footprint and half the industrial development. However, impacts would remain significant and unavoidable.

Biological Resources

Similar to BIG, this alternative would impact species identified as a candidate, sensitive or special status species, although to a lesser degree given the smaller footprint. However, with similar mitigation incorporated as under BIG, impacts under this alternative would also be less than significant.

This alternative would also impact sensitive natural communities and wetlands, like BIG. With incorporation of similar mitigation to BIG (acquiring mitigation credits through associated agency permitting processes), impacts under this alternative would be less than significant. Further, development under this alternative would involve approximately 50 percent less land area, therefore, impacts under this alternative would be less than under BIG.

Similar to BIG, development under this alternative would interfere substantially with the movement of wildlife species through established wildlife corridors and the movement of local wildlife within the footprint, although to a lesser degree given the smaller footprint. However, with incorporation of similar mitigation which requires construction of wildlife crossings to facilitate wildlife movement through the footprint, this alternative would not substantially interfere with the movement of wildlife species and impacts would be less than significant.

Overall, impacts concerning biological resources under the Reduced Intensity Alternative would be less than BIG, given this alternative proposes half the development footprint.

Cultural Resources

Ground disturbance under this alternative would occur to a lesser degree than BIG given a smaller development footprint. However, like BIG, this alternative would cause a substantial adverse change in the significance of historical resources. Like BIG, impacts would be reduced to less than significant with mitigation incorporated which would require preservation in place and the implementation of data recovery if resources are discovered.

Ground disturbance under this alternative would occur to a lesser degree than BIG given a smaller development footprint, but could still significantly impact human remains and other buried resources that could exist within the footprint.

Overall, impacts concerning cultural resources under the Reduced Intensity Alternative would be less than BIG, given this alternative proposes half the development footprint. However, impacts would remain significant and unavoidable.

Energy

Under this alternative, the construction and operational energy usage would be less than BIG since this alternative would involve 50 percent less construction and operations. This would result in proportionally less energy demand during construction and operations, including reduced diesel (from off-road mobile construction equipment and emergency backup generators), gasoline (from construction vendors and employee passenger vehicles), and electricity (from stationary construction equipment and operational lighting, air conditions, and heating).

Overall, impacts concerning energy under the Reduced Intensity Alternative would be less than BIG's, given this alternative proposes half the development footprint and impacts would be less than significant with mitigation incorporated.

Geology, Soils, and Mineral Resources

Under this alternative, ground-disturbing activities would still occur under this alternative, but to a lesser degree than BIG since this alternative would not develop the northeastern portion of the site. Similar to BIG, this alternative would have less than significant impacts related to geology and soils with mitigation incorporated. Regarding paleontological resources, ground-disturbing activities would still occur under this alternative, but to a lesser degree than BIG since this alternative would not develop the northeastern portion of the site. Like BIG, this alternative would have less than significant impacts to paleontological resources with mitigation incorporated.

Regarding mineral resources, impacts to mineral resources would be similar to BIG since development would still occur within/adjacent to the Mojave River, though would be less under this alternative.

Overall, impacts concerning geology, soils, paleontological resources, and mineral resources under the Reduced Intensity Alternative would be less than BIG, given this alternative proposes half the development footprint.

Greenhouse Gas Emissions

Under this alternative, construction and operations would be approximately 50 percent less than BIG. Therefore, under the Reduced Intensity Alternative, BIG construction and operational related GHG emissions would be proportionally less. However, the reduction in transload warehouse floor space would mean fewer trucks are removed from local highways by placement of containers onto trains for the closed loop operation, resulting in less reduction in GHG emissions from truck trips as compared to BIG. BIG would result in reduced net GHG emissions, therefore since this alternative would result in less reduction of net GHG emissions, this alternative would have increased net GHG emissions as compared to BIG. However, it is assumed impacts would remain less than significant.

Like BIG, it is assumed this alternative would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs and impacts would be less than significant.

Overall, impacts concerning GHG emissions under the Reduced Intensity Alternative would be greater than BIG's, given this alternative remove fewer trucks from local highways by placement of containers onto trains for the closed loop operation, resulting in less net GHG reduction. However, impacts would remain less than significant.

Hazards, Hazardous Materials, and Wildfire

This alternative would involve the same type of construction and operational activities as BIG but to a lesser degree given the development footprint and industrial development intensity would be approximately 50 percent less. Therefore, like BIG, this alternative could still create a significant hazard through the routine transport, use, or disposal of hazardous materials, or through accident conditions involving the release of hazardous materials into the environment. Following compliance with the established regulatory framework, and with mitigation incorporated, this alternative would result in less than significant impacts like BIG. Additionally, transportation of hazardous materials or waste within 1,000 feet of a school would occur under this alternative similar to BIG, although proportionally less given approximately 50 percent less operations. Like BIG, this alternative would comply with applicable laws, orders, and regulations, reducing impacts to less than significant.

Overall, impacts concerning hazards and hazardous materials under the Reduced Intensity Alternative would be less than BIG's, given this alternative proposes half the development footprint and amount of industrial development.

Hydrology and Water Quality

Similar to BIG, the Reduced Intensity Alternative would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality through the use of best management practices and low impact development features. Additionally, all development and construction documents would be required to be reviewed by the appropriate plan check agencies to ensure compliance and conformance with applicable laws, orders, and regulations.

Under this alternative, the development footprint would be approximately 50 percent less than BIG, however, the proportion of impermeable surfaces is anticipated to be similar to BIG. This alternative

would still treat stormwater and provide the necessary stormwater improvements pursuant to NPDES and City requirements similar to BIG.

Further, like BIG, this alternative would still alter the site's existing drainage pattern through the addition of impervious surfaces, but to a lesser degree than BIG. Similarly, the general existing drainage pattern would be maintained during construction and operations.

Overall, impacts concerning hydrology and water quality under the Reduced Intensity Alternative would be similar to BIG, given under this alternative, the fewer proposed impervious surfaces would achieve the same proportional reductions in stormwater runoff, and improvements to water quality during operations.

Land Use and Planning

Under this alternative, the rail yard and transload warehouse center would be developed within the western portion of the BIG footprint, but the development footprint and industrial development intensity would be approximately 50 percent less than BIG. Like BIG, this alternative would be subject to compliance with applicable land use plans, policies, and regulations adopted for the purpose of avoiding/mitigating an environmental effect and would not cause a significant environmental impact due to conflicts in this regard. Similar to BIG, this alternative would not divide an established community.

Overall, impacts concerning land use and planning under the Reduced Intensity Alternative would be similar to BIG, given, like BIG, this alternative would not conflict with existing County or City policies and a less than significant impact would occur.

Noise and Vibration

Under this alternative, noise from construction and operations would be less than BIG since the development footprint and industrial development intensity would be approximately 50 percent less. Further, as this alternative would concentrate the transload warehouse center at the western end of the BIG footprint, sensitive receptors along Lenwood Road and Main Street would experience less noise impacts from construction and operations. Notwithstanding, construction and operational noise levels at nearby sensitive receptors would still exceed noise standards under this alternative; specifically, during 33kV line construction and operational noise levels would exceed applicable exterior/interior noise standards and/or result in a substantial noise increase at nearby sensitive receptors. Like BIG, noise impacts would be significant and unavoidable despite compliance with mitigation.

Overall, impacts concerning noise and vibration under the Reduced Intensity Alternative would be less than BIG's though would still exceed noise standards, given, while this alternative would result in half the construction activity and industrial development, and during operations would result in approximately half the train traffic and associated rail noise, 33kV line construction and operations would still exceed noise standards.

Population and Housing

Like BIG, this alternative would not induce population growth directly through construction of new homes. Further, like BIG, this alternative could induce population growth directly through new businesses.

However, like BIG, the growth in jobs and housing needs in the City under this alternative would be anticipated by the proposed General Plan, and therefore the growth induced as part of this alternative would not be unplanned. It should be noted that approximately 50 percent less construction and operations would occur under this alternative as compared to BIG, it is reasonable to assume that this alternative would generate proportionally fewer construction and permanent jobs than BIG. As such, this alternative's impacts to population and housing would be less than BIG.

Overall, impacts concerning population and housing under the Reduced Intensity Alternative would be less than BIG's, given this alternative would generate proportionally fewer construction and permanent jobs.

Public Services and Recreation

Similar to BIG, the Reduced Intensity Alternative would not result in substantial adverse physical impacts associated with the provision of, or need for, new or physically altered, police protection, school, or library facilities, since construction of these facilities is not proposed or warranted. Like BIG, this alternative does not propose new housing, thus would result in less than significant impacts on recreation.

Under this alternative, the development footprint and industrial development intensity would be approximately 50 percent less than BIG. This alternative would still require paying a fair share development impact fee to assist the City in the development and expansion of City services as required to adequately serve BIG under this alternative.

Overall, impacts concerning public services and recreation under the Reduced Intensity Alternative would be less than BIG's, given as this alternative would result in half the industrial development, and like BIG, would be required to pay fair share development impacts fees.

Transportation

Similar to BIG, this alternative would not conflict with any program plan, ordinance, or policy addressing the circulation system and proposes improvements to the circulation system to provide vehicular pedestrian and bicycle access to BIG under the Reduced Intensity Alternative.

Under this alternative, the industrial development intensity would be approximately 50 percent less than BIG resulting in proportionally fewer vehicle trips (including trains, heavy-duty trucks, and worker trips) during construction and operations. However, the reduction in transload warehouse space would result in fewer trucks being removed from local highways and placed onto trains for the closed loop operation, resulting in greater truck miles travelled under this alternative.

Overall, impacts concerning transportation under the Reduced Intensity Alternative would be greater than BIG's, given this alternative would result in greater truck miles travelled due to the reduction in transload warehouse center space, despite half the square feet of industrial development. However, impacts would remain less than significant.

Tribal Cultural Resources

Overall, impacts concerning tribal cultural resources under the Reduced Intensity Alternative would be less than BIG's, given the proposed footprint would be proportionally less, resulting in proportionally less soils being disturbed. However, impacts would remain significant and unavoidable.

Utilities and Service Systems

Overall impacts concerning utilities and service systems under the Reduced Intensity Alternative would be less than BIG's, given this alternative would result in half the industrial development. However, like BIG, this alternative would require relocation/construction of new water, wastewater, and storm water conveyance infrastructure and utility infrastructure, the impacts thereof would be reduced to less than significant through compliance with the established regulatory framework and implementation of the mitigation measures.

Ability to Meet Project Objectives for BIG

Reduced Intensity Alternative would meet most objectives to a lesser degree than BIG. This alternative would still enable integrated, sustainable transportation. However, due to the reduced rail yard and transload warehouse center, operations under this alternative would be proportionally less, which may result in this alternative failing to meet some of the objectives for which BIG is proposed.

As addressed in **Table 8-14: Reduced Intensity Alternative Ability to Meet Project Objectives**, reduction of cross-dock intermodal operations under this alternative would result in less reduction of regional heavy-duty truck traffic congestion and therefore less reduction in road maintenance costs throughout the SCAG region, as compared to the reductions that would be achieved by BIG. Additionally, this alternative would have less available cargo handling volume. Therefore, more heavy-duty truck trips would occur under this alternative compared to BIG, which would lead to less reduction in GHG and criteria pollutant emissions.

The reduced amount of freight handling capacity under this alternative would also decrease the competitiveness of the High Desert economy compared to BIG as a smaller handling capacity would limit the efficient movement of goods to and from the High Desert. Further, reduced construction and operation intensity would reasonably proportionally decrease generated construction and permanent jobs, including potentially high-paying jobs within the High Desert. A reduction in development intensity and area would also fail to meet BIG's objective to have a site large enough for all BIG components (i.e., intermodal facility, transload warehouse center, block swap yard, and additional tracks along BNSF's existing mainline) to achieve maximum operational efficiency thereby increasing the speed and reliability of goods movement from the Ports to their end destinations and reducing delivery costs of goods imported through the Ports. While freight handling and transit time through the Midwest would still be improved, a reduction in operations would mean this alternative would result in a smaller improvement compared to BIG.

Table 8-14: Reduced Intensity Alternative Ability to Meet Project Objectives

Objective	Objective Met?
Increase the speed and reliability, and lower the cost, of moving containerized goods from the San Pedro Bay Ports (“Ports”) to their end destinations, with the end effect of reducing traffic congestion and associated air emissions from trucking of goods to and from transload facilities, by constructing and operating a freight rail facility that comprises: • an intermodal freight rail yard (IMF) with a “closed loop” connection to an on-site transload warehouse center of sufficient capacity to attract large-scale users of warehouse facilities and justify their adoption of rail transport instead of long-distance, heavy-duty truck transport, and • a block swap yard at the same site as the IMF, to enable blocks of rail cars with the same destination to be combined into a single train, thereby increasing the efficiency of goods movement by rail;	Yes, but to a lesser degree than BIG given the rail yard and transload warehouse center would include approximately 50 percent less industrial square feet.
Optimize symbiotic facility site design that allows the most efficient interplay between the operations of the block swap, IMF and transload warehouse center to ensure that the site will accommodate projected future demand.	No, given this alternative proposes a site design which accommodates half of the proposed BIG container processing, which would not accommodate projected future demand.
Construct and operate the facility in a manner that promotes the public policy goals in the State Rail Plan to reduce the disproportionate impacts of truck-borne goods movement in urbanized and densely populated areas adjacent to Port facilities in southern California.	Yes. This alternative would promote public policy goals in the State Rail Plan and reduce the disproportionate impacts of truck-borne goods. However, given this alternative proposes approximately half of the container throughput proposed under BIG, this alternative would accomplish this objective to a lesser degree.
Utilize a single technology platform to track goods throughout their journey from the Ports through the facility to their end destinations, thereby maintaining greater control, awareness, and visibility of goods movement through the supply chain;	Yes, given a similar technology platform would be utilized under this alternative.
Design the facility so that its construction and operations do not interfere with or cause delays to existing operations on the mainlines.	Yes, given this alternative does require trains to cross mainline tracks to cross between the block swap yard and intermodal facility.
Locate the facility at a site that would:	
• be large enough for all BIG components (i.e., intermodal facility, transload warehouse center, block swap yard, additional laydown area, and additional tracks along BNSF’s existing mainline);	Yes, but to a lesser degree than BIG given the rail yard and transload warehouse center would include approximately 50 percent less industrial square feet.
• be positioned along BNSF’s existing mainline and near where the Cajon, Mojave, and Needles Subdivision mainlines converge (i.e., the “Subdivision Wye”);	Yes, given this alternative would be located along BNSF’s existing mainline and near the “Subdivision Wye.”

Table 8-14: Reduced Intensity Alternative Ability to Meet Project Objectives

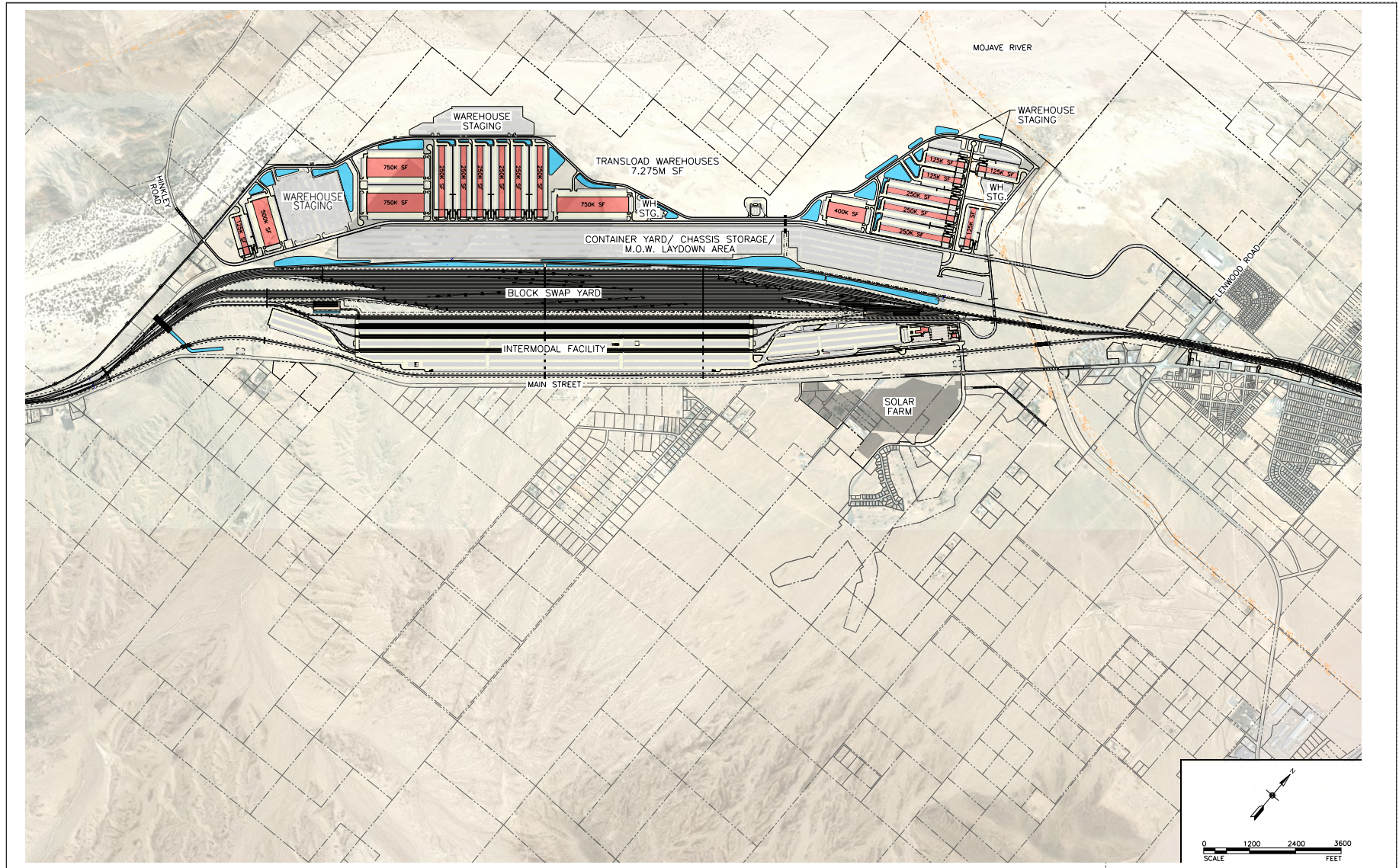
Objective	Objective Met?
be positioned near an existing locomotive maintenance facility, or with sufficient space for a new locomotive maintenance facility;	Yes , given this alternative would be located near the existing Barstow locomotive maintenance facility.
be positioned a reasonable distance from heavily urbanized areas (where land use incompatibilities can be minimized) yet near an existing employment base, freeways, and essential infrastructure;	Yes , given this alternative would be located just outside of the City’s urbanized area yet near an existing employment base, freeways, and essential infrastructure like BIG.
be relatively level and largely devoid of existing land uses and sensitive biological resources;	Yes , given this alternative would be located within a portion of the BIG footprint which is relatively level and largely devoid of existing land uses and sensitive biological resources.
allow for sufficient on-site power generation to the rail yard (i.e., solar farm).	Yes , given that the solar farm would be constructed under this alternative.

8.10.3 BIG West Transload Warehouse Center Alternative

Under the BIG West Transload Warehouse Center Alternative, a rail yard with block swap yard, intermodal facility, and ancillary rail areas (container yard/chassis storage and maintenance of way laydown) and a transload warehouse center would be developed as would under BIG, except no transload warehouse center buildings would be constructed east of the Lenwood Channel. As shown in **Figure 8-7: West Transload Warehouse Center Alternative**, this alternative would locate the transload warehouse center entirely west of the Lenwood Channel, resulting in a total transload warehouse center footprint of approximately 690 acres, or approximately 48 percent fewer acres than the approximately 1,330 acres proposed under BIG. As a result, the transload warehouse center floor area under this alternative would total 7.3 million square feet, or approximately 19 percent less than the 9.0 million square feet proposed under BIG. BIG’s proposed off-site improvements would remain unchanged under this alternative.

Under this alternative, the BIG Specific Plan would be implemented similar to BIG, but its boundaries would differ. The approximately 640 acres east of Lenwood Channel (i.e., “Industrial Park” area) would be designated General Industrial (GI) pursuant to the proposed General Plan and pre-zoned Industrial. Therefore, under this alternative, the Industrial Park area would be excluded from the BIG Specific Plan. The General Industrial land use designation is intended for varieties of activities ranging from manufacturing, warehousing and distribution to industrial plants. Under this alternative, BNSF would not develop the Industrial Park area although it could be developed by others in accordance with the City’s proposed General Plan General Industrial land use designation and Industrial pre-zoning.

Table 8-15: Development Assumptions Under Transload Warehouse Center Alternative shows the maximum and assumed development capacities for the Industrial Park area based on the City’s proposed Industrial pre-zoning and allowable floor area ratios (FAR). As indicated in **Table 8-15: Development Assumptions Under Transload Warehouse Center Alternative**, the maximum development capacity for the Industrial Park area totals approximately 14 million square feet of industrial park uses.



Source:
Transystems, 2023

Figure 8-7
West Transload Warehouse Center Alternative

Table 8-15: Development Assumptions Under Transload Warehouse Center Alternative	
Development Factor	Assumptions
Acres	640
Allowable FAR ¹	0.5
Maximum Allowable Development (SF)	14,000,000
Notes: Barstow Municipal Code § 19.18: Industrial District.	

Although the development presented in **Table 8-15: Development Assumptions Under Transload Warehouse Center Alternative** is allowed, it is highly unlikely that this area would be developed to this maximum capacity within the Horizon Year (2048) based on the Market Analysis that was conducted. The Market Analysis considered the market area's historic growth patterns and the BIG Specific Plan area's existing conditions, as well as the following factors:

- Review of historic records (see **Appendix 5.9 BIG-1** for historical land uses and development patterns) indicates much of this land has never been developed, indicating little to no market interest in its development.
- Review of existing and proposed zoning for parcels within the BIG footprint.
- Consideration of potential development constraints (utilities, roadway access and street improvements)

The Market Analysis found that this alternative would result in 550,000 to 900,000 square feet of industrial uses being built by 2048. Therefore, this alternative conservatively assumes development of approximately two percent of the maximum development capacity specified in **Table 8-15: Development Assumptions Under Transload Warehouse Center Alternative** or approximately 550,000 square feet of industrial park uses. Overall, this alternative assumes development of approximately 8.0 million square feet of industrial uses, including approximately 550,000 square feet of industrial park uses, approximately 150,000SF of rail yard buildings and structures, and approximately 7.3 million square feet of transload warehouse center floor area.

Table 8-16: West Transload Warehouse Center Alternative Compared to BIG compares development under the West Industrial Alternative to development under BIG. Comparatively, this alternative involves approximately 11 percent less total industrial square footage than BIG, including approximately 19 percent less transload warehouse center floor area.

Table 8-16: West Transload Warehouse Center Alternative Compared to BIG			
Description of Land Uses	Industrial Business Park (SF)	Industrial – Closed Loop (SF)	Total (SF)
BIG			
Transload Warehouse Center	--	9,000,000	9,000,000
Rail Yard Buildings and Structures	--	150,000	150,000
BIG Total	--	9,150,000	9,150,000
West Transload Warehouse Center Alternative			
Industrial Park	550,000		550,000
Transload Warehouse Center	--	7,300,000	7,300,000
Rail Yard Buildings and Structures	--	150,000	150,000
Alternative Total	550,000	7,450,000	8,000,000
Difference between Alternative and BIG	+550,000 +100%	-1,700,000 -19%	-1,150,000 -12.5%
Note: DU = dwelling units; SF = square feet			

Under this alternative, construction would be approximately the same duration as under BIG but would result in approximately 3 million cubic yards less earthwork. Earthwork was estimated to total approximately 23 MCY, or approximately 12 percent less than BIG’s estimated 26 MCY. Construction activities would be proportionately greater under this alternative compared to BIG, given the rail yard and off-site improvements would remain unchanged, though 1.1 million square feet more warehouse space would be constructed. The phasing and construction schedule is assumed to be the same given the rail yard and off-site improvements would remain unchanged.

Electric hostlers would need to travel farther under this alternative, given the transload warehouse center would be concentrated farther to the west, away from the proposed overpass from the rail yard to the transload warehouse center, see **Figure 8-7: West Transload Warehouse Center Alternative**. During operations, because transload warehouse center development would be farther from the proposed overpass from the rail yard to the transload warehouse center, electric hostlers would need to dray containers farther under this alternative, resulting in additional travel time and electric hostlers. Concentrating transload warehouse center development to the west would site the transload warehouse center further from sensitive receptors along Lenwood Road, but would allow traditional, truck intensive industrial uses within this area. Under this alternative, given reduced transload warehouse center square footage, BIG’s intermodal facility operations would be proportionately less.

Aesthetics

This alternative assumes development of approximately 11 percent less industrial floor area than BIG, with the transload warehouse center designed pursuant to BIG Specific Plan development standards designed pursuant to Barstow Municipal Code Industrial zone development standards. Under this alternative, the degree of visual alteration to undeveloped lands within the Specific Plan area would be similar to BIG since development under this alternative would occur at an intensity of approximately 11 percent less than under BIG, with the lesser intensity occurring within the Industrial Park area. As a result, and since the rail yard and solar farm would be developed same as BIG under this alternative, views along

the 3-mile segment of Main Street designated as a National Scenic Byway would be altered to a similar degree as BIG. Like BIG, this alternative would substantially damage views of scenic resources within a State scenic highway, resulting in a significant and unavoidable impact. Under this alternative, the visual character and quality of the footprint would be altered similar to BIG. Under this alternative, replacement of the desert landscape along the western portion of Main Street would still occur and the overall visual character would still be permanently altered. As such, like BIG, impacts under this alternative would remain significant and unavoidable.

Like BIG, development under this alternative would introduce new sources of light and glare in a generally rural, undeveloped area. Development under this alternative would also include a solar farm and operational lighting and signage similar to BIG, thus, would still result in a significant increase in sources of light and glare in the area. Although, light and glare impacts under this alternative would be proportionately less than BIG at the Industrial Park area, impacts under this alternative would remain significant and unavoidable.

Overall impacts regarding aesthetics under the West Transload Warehouse Center Alternative would be the same as BIG's since development would occur similarly, except at a lower intensity in the Industrial Park area. Therefore, impacts would remain significant and unavoidable.

Agriculture and Forestry

Of the 3,855 acres of vacant lands within the BIG footprint, approximately 313 acres are designated Important Farmland (Agricultural Land). Under this alternative, Important Farmland would also be converted to non-agricultural uses, as determined to occur under BIG in **Section 5.2: Agriculture and Forestry Resources**.

Like BIG, under this alternative, the approximately 598 acres within the BIG Specific Plan area zoned for agricultural uses would be rezoned under the proposed General Plan to non-agricultural uses and approximately 10 acres within the off-site improvements area would remain County zoned for agricultural use. Like BIG, this alternative would result in a significant unavoidable impact due to the proposed General Plan rezoning of 598 acres to BIG Specific Plan. However, like BIG, the proposed land uses under this alternative outside of the BIG Specific Plan area would not conflict with County agricultural zoning, and no impact would occur in this regard. Like BIG, it is unlikely that construction or operation of this alternative would result in the conversion of Important Farmland from construction, incompatibility of uses, or other changes in the existing environment, since development under this alternative would include similar industrial land uses as would occur under BIG.

Overall, impacts concerning agricultural and forestry resources under the West Transload Warehouse Center Alternative would be similar to BIG since the conversion of Important Farmland to a non-agricultural use and conflict with County-zoned lands for agricultural use would also occur.

Air Quality

Under this alternative, it is anticipated that approximately 11 percent less industrial floor area would be constructed, as compared to BIG. Therefore, construction emissions would be proportionately less than under BIG. However, construction emissions under this alternative would still exceed MDAQMD

thresholds for construction air pollutant emissions and also conflict with or obstruct implementation of the applicable air quality plan, MDAQMD and would result in a cumulatively considerable net increase of criteria pollutants for which the region is in nonattainment under an applicable federal or State AAQS and expose sensitive receptors to substantial pollutant concentrations. Under this alternative, construction impacts would remain significant and unavoidable like BIG.

This alternative proposes approximately 11 percent less total industrial square feet than BIG, however, approximately 700,000 square feet of traditional trucking intensive industrial uses, which would result in greater local air quality impacts than would occur with BIG's proposed closed loop operation. Closed loop operations would involve containers being offloaded at the rail yard, taken by electric hostlers to the transload warehouse center, transloaded, then taken by electric hostlers back to the rail yard to be loaded onto a train and taken eastward. Traditional trucking intensive industrial uses of similar scale to BIG's transload warehouse center would result in greater operational emissions than BIG due to the closed loop operation using electric hostlers. Therefore, despite the reduction in total industrial floor area, it is assumed that overall operational emissions under this alternative would be similar to BIG. Operational emissions from this alternative would still exceed MDAQMD thresholds for operational air pollutant emissions and conflict with or obstruct implementation of the MDAQMD's AQMP and would result in a cumulatively considerable net increase of criteria pollutants for which the region is in nonattainment under an applicable federal or State AAQS and expose sensitive receptors to substantial pollutant concentrations. Therefore, under this alternative, operational impacts would remain significant and unavoidable.

Like BIG, this alternative would also result in less than significant impacts regarding odors.

Overall, although construction air quality impacts under the West Transload Warehouse Center Alternative would be less than BIG, given less construction would result in less emissions, operational air quality impacts would be greater given the traditional warehousing operations under this alternative would be trucking intensive resulting in greater emissions than BIG's closed loop operations, thus, would remain significant and unavoidable.

Biological Resources

Development under this alternative would occur within the same footprint as BIG; therefore, like BIG, this alternative would also impact candidate, sensitive, and special status species. This alternative would likely include similar mitigation to BIG, impacts under this alternative would be reduced to a less than significant level.

Since this alternative would occur within the same footprint, similar substantial adverse effects to sensitive natural communities and wetlands would occur, like BIG. With incorporation of similar mitigation as BIG (acquiring mitigation credits through associated agency permitting processes), impacts under this alternative would also be less than significant.

Like BIG, this alternative would interfere substantially with the movement of wildlife species through established wildlife corridors and the movement of local wildlife within the footprint. With incorporation

of similar mitigation as BIG (construction of wildlife movements corridors), impacts under this alternative would also be less than significant.

Overall impacts concerning biological resources under the West Transload Warehouse Center Alternative would be similar to BIG's, given this alternative would occur within the same footprint.

Cultural Resources

Except the Industrial Park area where less development would occur, development under this alternative would occur within the same footprint as BIG, which contains documented historical and archeological resources eligible for listing in the NRHP/CRHR. Therefore, like BIG, significant and unavoidable impacts to historic and archaeological resources would still occur although to a lesser degree than BIG, despite incorporation of mitigation which requires preservation in place and the implementation of data recovery. Therefore, like BIG, substantial adverse changes in the significance of historical and archaeological resources would also occur under this alternative.

Except the Industrial Park area, construction under this alternative would include ground-disturbing activities within the same footprint as BIG, which is considered sensitive for human remains due to presence of archaeological sites and isolated resources that contain them. Construction under this alternative would potentially disturb human remains, but like BIG, compliance with established regulatory framework would reduce impacts to less than significant.

Overall impacts concerning cultural resources under the West Transload Warehouse Center Alternative would be similar to BIG's, given this alternative would occur within the same footprint except the Industrial Park area, and impacts would remain significant and unavoidable.

Energy

Under this alternative, approximately 1.7 million square feet of transload warehouses would be replaced with approximately 700,000 square feet of traditional industrial uses, resulting in approximately 11 percent less construction of industrial floor area, as compared to BIG. Therefore, less construction lighting, diesel generators, and other equipment would be utilized resulting in less construction energy consumption and potential for waste. The same design features and energy efficiency measures would be incorporated into construction and operations which would avoid wasteful energy consumption.

Under this alternative, approximately 1.7 million square feet of transload warehouses would be replaced with approximately 700,000 square feet of traditional industrial uses, resulting in approximately 11 percent less operational energy consumption, including reduced diesel (from emergency backup generators), gasoline (from employee passenger vehicles) and electricity (from transload warehouse center warehouse heating, air conditioning, and lighting, and electric hostlers). Intermodal operations would result in reduced diesel demand due to the proportionate reduction in locomotive operations required for the transload warehouse center cross-dock intermodal operations. However, given the additional approximately 700,000 square feet of traditional industrial uses would be trucking-intensive, this alternative would result in greater diesel fuel consumption associated with trucking. Therefore, it is conservatively assumed impacts would be remain significant and unavoidable.

Overall, impacts concerning energy under the West Transload Warehouse Center Alternative would be similar to BIG. Although this alternative would result in less electrical and fuel consumption, like BIG, it would not be wasteful.

Geology, Soils, and Mineral Resources

Like BIG, this alternative's proposed development would be required to follow and conform to the current California Building Code and City and County standards concerning seismic, geologic, and soils hazards, resulting in a less than significant impact.

Like BIG, it is assumed this alternative would connect to City wastewater services since this alternative only proposes approximately 11 percent fewer industrial uses. Therefore, like BIG, this alternative would not construct septic or alternative wastewater disposal systems in unsuitable soils, and no impact would occur.

Under this alternative, ground disturbance and development within the same footprint as BIG would occur, except the Industrial Park area where less development would occur. Like BIG, construction within the Industrial Park area, which could potentially contain paleontological resources, would still occur. Development under this alternative would incorporate similar mitigation measures as BIG, which require paleontological monitoring during construction. Therefore, like BIG, development under this alternative would result in less than significant impacts with mitigation incorporated regarding paleontological resources.

The BIG footprint contains mineral deposits where significant inferred resources are present and/or known mineral deposits that may qualify as mineral resources have been identified. Therefore, given similar development footprints, like BIG, development under this alternative could also result in the loss of availability of a known mineral resource that may be of economic value to the region and the State's residents. However, mining of these mineral resources is extremely unlikely given it is almost entirely within the Mojave River and depth to groundwater is too shallow for mining within the Mojave River. Therefore, like BIG, impacts under this alternative would be less than significant.

Overall impacts concerning geology, soils, and mineral resources under the West Transload Warehouse Center Alternative would be similar to BIG's, given this alternative would occur generally within the same footprint, except the Industrial Park area.

Greenhouse Gas Emissions

Under this alternative, approximately 11 percent less industrial floor area would be constructed, as compared to BIG. This alternative proposes trucking intensive traditional industrial uses and would locate the transload warehouse center further west, which would require the electric hostlers to travel further during operations. BIG would result in reduced net GHG emissions. Although this alternative would result in approximately 11 percent less industrial floor area, it is assumed that GHG emissions would be similar to BIG's given this alternative would include traditional, trucking intensive industrial uses. It is assumed that impacts under this alternative would be less than significant, but depending on the trucking-intensive traditional warehouses, may exceed GHG thresholds and result in a significant impact. This assumption is conservative because it results in a smaller "delta" between BIG and this alternative.

Like BIG, it is assumed this alternative would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs and impacts would be less than significant.

Overall impacts concerning GHG emissions under the West Transload Warehouse Center Alternative would be similar to BIG's, since development under this alternative would propose approximately 11 percent less industrial floor area, but would include traditional, trucking intensive industrial uses and impacts would remain less than significant.

Hazards, Hazardous Materials, and Wildfire

Like BIG, the footprint would be developed with land uses which involve large amounts of freight rail that could potentially include the transport of hazardous materials. Since development under this alternative would result in a similar scale of transported hazardous materials, development under this alternative would result in significant and unavoidable impacts regarding the routine transport, use or disposal of hazardous materials, like BIG. However, given less industrial development and intermodal facility operations would occur, less hazardous materials would be transported.

Given this alternative would also involve the demolition of existing land uses, foreseeable upset and accident conditions involving the release of hazardous materials into the environment would also occur under this alternative, though to a lesser degree than BIG. However, like BIG, compliance with existing regulatory framework would reduce impacts to less than significant.

Like BIG, construction and operational activities under this alternative could emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing school, but to a lesser degree. Like BIG, these activities would be subject to compliance with federal, State, and local regulations, thus, would result in a less than significant impact.

Like BIG, development under this alternative would not be located on a site included in a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 (i.e., the Cortese list), in or near lands classified as a very high fire hazards severity zone, or near a public airport, and no impact would occur in this regard.

Overall impacts concerning hazards, hazardous materials, and wildfire under the West Transload Warehouse Center Alternative would be less than BIG's since less construction and operations would occur under this alternative.

Hydrology and Water Quality

Like BIG, development under this alternative would be required to comply with the established regulatory framework to mitigate potential impacts concerning water quality during construction and operations. This alternative would also include operation of a large rail yard, which is known to generate significant amounts of heavy metals and water pollutants. Like BIG, these pollutants would be intercepted and treated by BMPs. However, this alternative anticipates approximately 11 percent less industrial floor area than BIG, thus, would result in proportionately less impermeable surfaces and less stormwater runoff and interference with groundwater recharge than would occur under BIG. As such, impacts under this alternative would be proportionately less than BIG.

Overall impacts concerning hydrology and water quality under this alternative would be proportionately less than BIG's, since proportionately less impervious surfaces would be developed under this alternative.

Land Use and Planning

Under this alternative, the BNSF rail yard and transload warehouse center would be developed west of Lenwood Channel and the approximately 640 acres east of Lenwood Channel would be developed according to the General Plan General Industrial land use designation and Industrial zone development standards. Like BIG, this alternative would be consistent with applicable land use plans, policies, and regulations adopted for the purpose of avoiding/mitigating an environmental effect. Similar to BIG, this alternative would not divide an established community.

Overall impacts concerning land use and planning under the West Transload Warehouse Center Alternative would be similar to BIG, and would be less than significant.

Noise and Vibration

Under this alternative, grading would still occur and improvements constructed throughout generally the same footprint as BIG, except the Industrial Park area, resulting in construction noise and vibration impacts similar to BIG. Less construction would occur given this alternative proposes approximately 11 percent less industrial land uses, although due to the location of the nearest sensitive receptors, construction impacts would be similar to BIG's.

During operations, train volumes would be proportionately less than BIG given approximately xxx percent less transload warehouse center floor area would be operational. Therefore, operational rail noise impacts would be proportionately less, given rail operations are the primary source of noise. However, due to approximately 700,000 square feet of traditional industrial uses in Industrial Park area, there would be increased truck traffic and associated mobile source noise, resulting in greater mobile source noise impacts to receptors east of Lenwood Road than under BIG.

Overall, operational train noise impacts would also be less than BIG's since there would be proportionally less daily train trips. However, mobile traffic noise impacts would be greater than BIG's due to an increase in industrial square footage. Thus, operational noise impacts would be similar to BIG's. Construction noise impacts would also be similar to BIG's. Therefore, overall noise and vibration impacts would remain significant and unavoidable.

Population and Housing

Under this alternative, BIG construction would similarly acquire and remove approximately 57,000 commercial square feet and 128,000 industrial square feet.

Like BIG, this alternative would not necessitate construction of replacement housing elsewhere, resulting in a less than significant impact. Therefore, under this alternative, impacts related to displacement and replacement housing would be similar to BIG.

Under this alternative, proportionately fewer direct, indirect, and induced jobs would be created, as compared to BIG, given proportionately less transload warehouse center floor area would be constructed. Similarly, rail yard operations would be proportionately less under this alternative given fewer containers

would be processed at the transload warehouse center than BIG. Given fewer transload warehouse center and rail yard jobs would be created under this alternative, fewer indirect and induced jobs would be created and less population growth would occur.

It should be noted that 11 percent less construction and operations would occur under this alternative as compared to BIG, therefore it is reasonable to assume that this alternative would generate proportionally fewer construction and permanent jobs than BIG. As such, this alternative's impacts to population and housing would be proportionately less than BIG.

Therefore, this alternative would induce proportionately less direct and indirect population growth than BIG.

Overall, impacts concerning population and housing under the West Transload Center Alternative would be less than BIG's, since direct and indirect induced population growth would be proportionally less than BIG.

Public Services and Recreation

Under this alternative, land not developed with a rail yard or transload warehouse center within the footprint would be developed pursuant to the proposed General Plan land use designations. The proposed General Plan has mechanisms in place for individual developments within the footprint to pay fair share development impact fees to expand services, as necessary. Like BIG, development under this alternative would be required to pay fair share development impact fees. As such, like BIG, development under this alternative would not result in the need for new or physically altered fire or police protection facilities, school facilities, library facilities, or park facilities. Therefore, environmental impacts due to the construction of such facilities would not occur and impacts would be less than significant.

Overall, impacts concerning public services and recreation under the West Transload Warehouse Center alternative would be proportionately less than BIG's, as this alternative would result in approximately 11 percent less industrial development, and like BIG, would pay fair share impact fees to expand public services as needed.

Transportation

Similar to BIG, this alternative would not conflict with any program plan, ordinance, or policy addressing the circulation system and proposes improvements to the circulation system to provide vehicular pedestrian and bicycle access to the BIG footprint under this alternative.

Under this alternative, more heavy-duty truck trips during operations would be generated, as compared to BIG given approximately 700,000 square feet of traditional warehouses would be developed. However, under this alternative, less transload warehouse space would result in proportionately fewer trucks being removed from local highways and placed onto trains for the closed loop operation, resulting in greater truck miles travelled under this alternative than under BIG.

Overall impacts concerning transportation under the West Transload Warehouse Center Alternative would be greater than BIG's, since this alternative would include approximately 700,000 square feet of

traditional warehouses and would result in greater truck miles travelled due to the reduction in transload warehouse center space.

Tribal Cultural Resources

Like BIG, anticipated construction under this alternative would occur within the BIG Specific Plan area which contains documented.

Except the Industrial Park area where less development would occur, development under this alternative would occur within the same footprint as BIG, which contains documented prehistoric cultural resources, which include 19 resources that are recommended eligible for listing in the NRHP and the CRHR. Therefore, like BIG, significant and unavoidable impacts to prehistoric cultural resources would still occur although to a lesser degree than BIG, despite incorporation of mitigation identified in **Section 5.5: Cultural Resources**. Therefore, like BIG, substantial adverse changes in the significance of prehistoric cultural resources would also occur under this alternative.

Overall impacts concerning tribal cultural resources under the West Transload Warehouse Center Alternative would be similar to BIG's, given this alternative would occur within the same footprint except the Industrial Park area, and impacts would remain significant and unavoidable.

Utilities and Service Systems

Under this alternative, the land east of Lenwood Channel would be developed pursuant to the Specific Plan development standards. The proposed land uses under this alternative have been anticipated in the proposed General Plan, which provides the basis for utility plans. Further, under this alternative, the intensity of uses anticipated under the proposed General Plan would be constructed at only 5 percent of the maximum development capacity, and therefore development of this alternative would result in proportionately less impacts regarding utilities and service systems than originally anticipated in the proposed General Plan. Additionally, the proposed General Plan has mechanisms in place for individual developments to pay fair share development impact fees to expand utilities and service systems, as necessary. As such, like BIG, development under this alternative would be required to pay fair share development impact fees. However, like BIG, this alternative would also include development which would require relocation/construction of new or expanded water, wastewater, storm water conveyance infrastructure and utility infrastructure, the impacts thereof would be reduced to less than significant through compliance with the established regulatory framework and implementation of the mitigation measure. Therefore, like BIG, this alternative would require relocation/construction of new utilities and service systems, the construction of which would be less than significant with incorporation of mitigation.

Overall impacts concerning utilities and service systems under the West Transload Warehouse Center Alternative would be less than BIG's, since development would include approximately 11 percent less total industrial floor area.

Ability to Meet Project Objectives for BIG

As identified below in **Table 8-17: West Transload Warehouse Center Alternative Ability to Meet Project Objectives**, the West Transload Warehouse Center Alternative would include the same key components

(rail yard consisting of a block swap yard and intermodal facility, transload warehouse center, and support rail use area, all within a single boundary). Therefore, this alternative would fulfill BIG’s objectives but to a lesser degree than BIG, given this alternative anticipates approximately 1.7 million square feet less transload warehouse center and proportionately less in container volumes at the rail yard. Therefore, this alternative would fulfill these objectives to a lesser degree as BIG. Further, with development of the Industrial Park area, although 11 percent less industrial development would occur, this alternative’s 550,000 square feet of traditional, truck intensive industrial uses would increase overall operational truck trips, emissions, and noise as compared to BIG.

Table 8-17: West Transload Warehouse Center Alternative Ability to Meet Project Objectives	
Objective	Objective Met?
Increase the speed and reliability, and lower the cost, of moving containerized goods from the San Pedro Bay Ports (“Ports”) to their end destinations, with the end effect of reducing traffic congestion and associated air emissions from trucking of goods to and from transload facilities, by constructing and operating a freight rail facility that comprises: - an intermodal freight rail yard (IMF) with a “closed loop” connection to an on-site transload warehouse center of sufficient capacity to attract large-scale users of warehouse facilities and justify their adoption of rail transport instead of long-distance, heavy-duty truck transport, and - a block swap yard at the same site as the IMF, to enable blocks of rail cars with the same destination to be combined into a single train, thereby increasing the efficiency of goods movement by rail;	Yes, but to a lesser degree than BIG, given the rail yard under this alternative would process approximately 19 percent fewer containers.
Optimize symbiotic facility site design that allows the most efficient interplay between the operations of the block swap, IMF and transload warehouse center to ensure that the site will accommodate projected future demand.	Yes, but to a lesser degree than BIG, given the rail yard under this alternative would process approximately 19 percent fewer containers.
Construct and operate the facility in a manner that promotes the public policy goals in the State Rail Plan to reduce the disproportionate impacts of truck-borne goods movement in urbanized and densely populated areas adjacent to Port facilities in southern California.	Yes, but to a lesser degree than BIG, given the rail yard under this alternative would process approximately 19 percent fewer containers.
Utilize a single technology platform to track goods throughout their journey from the Ports through the facility to their end destinations, thereby maintaining greater control, awareness, and visibility of goods movement through the supply chain;	Yes, given a similar technology platform would be utilized under this alternative.
Design the facility so that its construction and operations do not interfere with or cause delays to existing operations on the mainlines.	Yes, given this alternative would not require trains to cross the mainline tracks in order to move between the block swap yard and intermodal facility.

Table 8-17: West Transload Warehouse Center Alternative Ability to Meet Project Objectives	
Objective	Objective Met?
Locate the facility at a site that would:	
be large enough for all BIG components (i.e., intermodal facility, transload warehouse center, block swap yard, additional laydown area, and additional tracks along BNSF's existing mainline);	Yes , but to a lesser degree than BIG, given this alternative would occur within the approximately similar footprint, but to a lesser degree given the rail yard and transload warehouse center would be approximately 19 percent smaller under this alternative compared to BIG.
be positioned along BNSF's existing mainline and near where the Cajon, Mojave, and Needles Subdivision mainlines converge (i.e., the "Subdivision Wye");	Yes , given this alternative would be located along BNSF's existing mainline and near the "Subdivision Wye."
be positioned near an existing locomotive maintenance facility, or with sufficient space for a new locomotive maintenance facility;	Yes , given this alternative would be located near the existing Barstow locomotive maintenance facility.
be positioned a reasonable distance from heavily urbanized areas (where land use incompatibilities can be minimized) yet near an existing employment base, freeways, and essential infrastructure;	Yes , given this alternative would be located just outside of the City's urbanized area yet near an existing employment base, freeways, and essential infrastructure like BIG.
be relatively level and largely devoid of existing land uses and sensitive biological resources;	Yes , given this alternative would be located within a portion of the BIG footprint which is relatively level and largely devoid of existing land uses and sensitive biological resources.
allow for sufficient on-site power generation to the rail yard (i.e., solar farm).	No , given CPUC regulations would prohibit the solar farm from powering the rail yard under this alternative.

8.11 ENVIRONMENTALLY SUPERIOR ALTERNATIVES

Proposed General Plan

CEQA requires a lead agency to identify the "environmentally superior alternative" and, in cases where the "No Project" Alternative is environmentally superior to the project, the environmentally superior development alternative must be identified. The programmatic alternative analysis for the proposed General Plan in this section identifies the No BIG alternative as the environmentally superior alternative. However, since the No BIG alternative to the General Plan is functionally equivalent to a no project alternative to BIG, this EIR identifies a development alternative to BIG, the West Transload Center Alternative, as the environmentally superior alternative to BIG.

For the proposed General Plan, the No BIG Alternative has been identified as the environmentally superior alternative. This alternative would update the General Plan to be consistent with State law but would not approve BIG Specific Plan. None of the conclusions in the EIR would change, however the lack of

employment growth associated with BIG will reduce the severity of potential impacts compared to those evaluated in the EIR. See **Table 8-18: Comparison of Alternatives Impacts to the Proposed General Plan**.

Table 8-18 compares the impacts of each alternative to the proposed General Plan. Based on the analysis in this section, and the conclusions for the proposed General Plan, the environmentally superior alternative would be the No BIG Alternative. As shown in the table, this alternative would reduce some environmental impacts but would not meet the majority of the objectives.

Table 8-18: Comparison of Alternatives Impacts to the Proposed General Plan			
Topic	Proposed General Plan	No Proposed General Plan/2015 General Plan Amendment	No BIG/Proposed General Plan Reduced Development Alternative
Aesthetics*	SU	✓	✓
Agriculture and Forestry Resources*	SU	✓	=
Air Quality*	SU	✓	▲
Biological Resources	LS	✓	✓
Cultural Resources*	SU	✓	✓
Energy	LS	✓	✓
Geology, Soils, & Mineral Resources*	SU	✓	✓
Greenhouse Gas Emissions*	SU	✓	✓
Hazards and Hazardous Materials & Wildfire	LS	✓	✓
Hydrology and Water Quality	LS	=	✓
Land Use and Planning	LS	▲	=
Noise*	SU	✓	✓
Population and Housing	LS	✓	✓
Public Services and Recreation	LS	✓	✓
Transportation*	SU	✓	✓
Tribal Cultural Resources*	SU	✓	✓
Utilities and Service Systems	SU	✓	✓
Notes: NI = No Impact; LS = Less than Significant; LS/M = Less than Significant with Mitigation Incorporated; SU = Significant and Unavoidable ▲ Indicates an impact that is greater than the proposed Project (environmentally inferior). ✓ Indicates an impact that is less than the proposed Project (environmentally superior). = Indicates an impact that is equal to the proposed Project (neither environmentally superior nor inferior). * Impact would still be significant and unavoidable.			

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Table 8-19: Comparison of Alternatives Impacts to BIG compares the environmental impacts of each alternative to BIG. According to State CEQA Guidelines § 15126.6(e)(2), No Project Alternative, “If the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” As indicated in the table, the environmentally superior alternative is the No BIG/No Annexation Alternative. Among the other

alternatives, the West Transload Warehouse Center Alternative is the environmentally superior alternative. It would be environmentally superior to BIG for various resource areas analyzed, excluding Transportation, for which it would be environmentally inferior to BIG, and excluding Aesthetics, Agriculture and Forestry, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Land Use and Planning, Noise, and Tribal Cultural Resources, for which it would be neither environmentally superior nor inferior to BIG. However, this alternative would not eliminate the significant unavoidable impacts of Aesthetics, Air Quality, Cultural Resources, Noise, Tribal Cultural Resources and would not achieve the objectives to the same level as the proposed Project.

Table 8-19: Comparison of Alternatives Impacts to BIG				
Environmental Topic	BIG	No BIG/No Annexation Alternative	Reduced Intensity Alternative	West Transload Warehouse Center Alternative
Aesthetics	SU*	▼*	=*	=*
Agriculture and Forestry Resources	LS	▼	=	=
Air Quality	SU	▼	▼*	▼*
Biological Resources	LS/M	▼	▼	=
Cultural Resources	SU	=*	=*	=*
Energy	LS/M	▲	▼	=
Geology, Soils, and Mineral Resources	LS/M	=	▼	=
Greenhouse Gas Emissions	LS	▲	▲	=
Hazards, Hazardous Materials, and Wildfire	LS/M	▼	▼	▼
Hydrology and Water Quality	LS	▼	=	▼
Land Use and Planning	LS	▼	=	=
Noise and Vibration	SU	▼	=*	=*
Population and Housing	LS	▼	▼	▼
Public Services and Recreation	LS	▼	▼	▼
Transportation	LS	▼	▲	▲
Tribal Cultural Resources	SU	=*	=*	=*
Utilities and Service Systems	SU	▲	=	▼
Note: NI = No Impact LS = Less than Significant LS/M = Less than Significant with Mitigation Incorporated SU = Significant and Unavoidable ▲ Indicates an impact that is greater than the proposed Project (environmentally inferior). ▼ Indicates an impact that is less than the proposed Project (environmentally superior). = Indicates an impact that is equal to the proposed Project (neither environmentally superior nor inferior). * Impact would still be significant and unavoidable.				

8.12 REFERENCES

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