5.0 ENVIRONMENTAL ANALYSIS

5.0.1 INTRODUCTION

Section 5.1 through **Section 5.17** present the existing regulatory setting and contain a detailed analysis of the existing environmental setting and potential Project impacts (including direct and indirect, and short-term and long-term) for each environmental issue area; see **Section 5.0.2: Environmental Issues Addressed**. **Sections 5.1** through **5.17** also include, for each threshold, a discussion of how the regulatory framework (e.g., laws, ordinances, regulations, etc.) would serve to avoid or reduce the Project's impact. Where potentially significant impacts remain despite compliance with the existing regulatory framework, feasible mitigation measures are recommended to avoid or reduce the Project's impacts. Finally, any Project impacts that remain significant despite compliance with the existing regulatory framework and incorporation of feasible mitigation measures are identified as significant and unavoidable. Additionally, **Section 6.0: Cumulative Impacts** contains a detailed analysis of potential cumulative impacts from Project implementation.

The Project being analyzed in **Section 5.0** is the City of Barstow's (City) proposed General Plan and the proposed Barstow International Gateway (BIG) (collectively referred to as the Project or proposed Project) (State CEQA Guidelines § 15378) and described in detail in **Section 3.0: Project Description**. The Project's environmental analysis considers the whole of the proposed actions, which have the potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment.

Under CEQA, the type of project determines the degree of specificity required in an EIR. Generally, the level of specificity included in the environmental analysis is commensurate with the level of detail that is known. State CEQA Guidelines §15378: Degree of Specificity, provides that:

> *The degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR.*
>
> *a) An EIR on a construction project will necessarily be more detailed in the specific effects of the project than will be an EIR on the adoption of a local general plan or comprehensive zoning ordinance because the effects of the construction can be predicted with greater accuracy.*
>
> *b) An EIR on a project such as the adoption or amendment of a comprehensive zoning ordinance or a local general plan should focus on the secondary effects that can be expected to follow from the adoption or amendment, but the EIR need not be as detailed as an EIR on the specific construction projects that might follow.*

The proposed General Plan, which is described in detail in **Section 3.0: Project Description**, includes a comprehensive update to the City of Barstow 2015-2020 General Plan (2015 General Plan), changes in land use designations and zoning, new policies to comply with State law, and goals and policies that are related and considered one large project. Additionally, the proposed General Plan's individual activities are anticipated to result in generally similar environmental effects that can be mitigated in similar ways. As such, **Section 5.0** includes a programmatic approach to analysis of the proposed General Plan, pursuant

to State CEQA Guidelines § 15168: Program EIR. The proposed General Plan's environmental analysis focuses on the General Plan's broad policy and does not address potential site-specific impacts of individual projects that may occur within the City since these are currently unknown.

In contrast, BIG proposes a specific development project where details concerning its planning, construction, and operation are currently known, and the environmental changes resulting from these are evaluated based on the degree of that detail. As such, a project-level approach to analysis of BIG is included in **Section 5.0**, pursuant State CEQA Guidelines § 15161: Project EIR.

5.0.2 ENVIRONMENTAL ISSUES ADDRESSED

Section 5.1 through **Section 5.17** analyze the environmental issue areas listed below, which are those where potentially significant impacts could occur, based on review of the Project, agency consultation, the Notice of Preparation (NOP), and comments in response to the NOP and Scoping Meeting.

5.1 Aesthetics
5.2 Agriculture and Forestry Resources
5.3 Air Quality
5.4 Biological Resources
5.5 Cultural Resources
5.6 Energy
5.7 Geology, Soils, and Mineral Resources
5.8 Greenhouse Gas Emissions
5.9 Hazards, Hazardous Materials, and Wildfire
5.10 Hydrology and Water Quality
5.11 Land Use and Planning
5.12 Noise
5.13 Population and Housing
5.14 Public Services and Recreation
5.15 Transportation
5.16 Tribal Cultural Resources
5.17 Utilities and Service Systems

5.0.3 FORMAT AND CONTENT OF THE ENVIRONMENTAL ANALYSIS

Each potentially significant environmental issue area is addressed in a separate EIR section and is organized into eight major topics:

1. **Introduction** briefly introduces the section's purpose, environmental issues that are addressed, and key source documentation used to prepare the analysis. This section also includes a Summary of Findings for the proposed General Plan and BIG.

2. **Regulatory Setting** discusses the policies, laws, ordinances, regulations, and standards applicable to the Project. This section applies to both the proposed General Plan and BIG analyses. See also **Section 5.0.3.2 - Treatment of County and City Land Use Plans, Policies, and Regulations** below.

3. **Methodology for Evaluating Impacts** describes the study area (i.e., affected environment) and methodology used to analyze potential Project impacts. The methodology may differ between the proposed General Plan and BIG analyses depending on the environmental issue area being analyzed.

4. **Environmental Setting** describes the existing physical environmental conditions in the General Plan area (i.e., the City and its Sphere of Influence [SOI]) and within and near the BIG footprint that may influence or affect the environmental issue under investigation. The environmental

setting is established under CEQA (including State CEQA Guidelines § 15125) and constitutes the baseline physical conditions by which it is determined whether an impact is significant.

The Environmental Settings may differ between the proposed General Plan and BIG analyses, depending on the environmental issue area being analyzed.

5. **Impact Thresholds and Significance Criteria** provides the thresholds that are the basis for determining whether the Project would have a significant effect on the environment (i.e., conclusions of significance). State CEQA Guidelines Appendix G: Environmental Checklist Form (14 California Code of Regulations §§ 15000-15387) includes suggested questions for each environmental issue area. As the Lead Agency, the City has decided to base their impact thresholds on State CEQA Guidelines Appendix G.

   Primary sources used in identifying the criteria include the State CEQA Guidelines; local, State, federal, or other standards applicable to an impact category; and officially established significance thresholds. "…An ironclad definition of significant effect is not possible because the significance of any activity may vary with the setting" (State CEQA Guidelines § 15064(b)). Principally, "…a substantial, or potentially substantial, adverse change in any of the physical conditions within an area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic and aesthetic significance" constitutes a significant impact (State CEQA Guidelines § 15382).

6. **Project Impacts and Mitigation Measures** describes potential environmental changes to the existing physical conditions that may occur if the Project is implemented. Evidence, based on factual and scientific data, is presented to show the cause-and-effect relationship between the Project and the potential environmental changes. The magnitude, duration, extent, frequency, range, or other parameters of a potential impact are ascertained, to the extent possible, to determine whether impacts may be significant; all of the potential direct and reasonably foreseeable indirect effects are considered. See also **Section 5.0.3.2 - Treatment of County and City Land Use Plans, Policies, and Regulations**.

   Where potentially significant impacts remain despite compliance with the existing regulatory framework, feasible mitigation measures are recommended. Mitigation Measures are measures that would be required of the Project to avoid a significant adverse impact; minimize a significant adverse impact; rectify a significant adverse impact by restoration; reduce or eliminate a significant adverse impact over time by preservation and maintenance operations; or compensate for the impact by replacing or providing substitute resources or environment.

   Project Impacts and mitigation measures differ between the proposed General Plan and BIG, and therefore are described separately in this EIR.

7. **Significant Unavoidable Impacts** describes impacts that would remain significant and cannot be feasibly mitigated to less than significant levels, and thus would be unavoidable. To approve a project with unavoidable significant impacts, the Lead Agency must adopt a Statement of Overriding Considerations. In adopting such a statement, the Lead Agency is required to balance the benefits of a project against its unavoidable environmental impacts in determining whether

to approve the project. If a project's benefits are found to outweigh the unavoidable adverse environmental effects, the adverse effects may be considered "acceptable" (State CEQA Guidelines § 15093(a)).

Significant unavoidable impacts may differ between the proposed General Plan and BIG, and therefore are addressed separately.

8. **References** identifies the sources used in and throughout the section.

5.0.3.1 Levels of Significance

The level of significance is identified for each environmental issue threshold evaluated in **Section 5.0**. Although the criteria for determining significance are different for each issue area, the environmental analysis applies a uniform classification of the impacts based on definitions consistent with CEQA and CEQA Guidelines:

- **No Impact.** No impact indicates that the construction, operation, and maintenance of the proposed Project would not have any direct or indirect effects on the environment. It means no change from existing conditions. This impact level does not require mitigation.
- **Less Than Significant.** The Project would have the potential to impact the environment, although this impact would be below established thresholds that are considered to be significant. This impact level does not require mitigation, even if feasible, under CEQA.
- **Less Than Significant With Mitigation Incorporated.** The Project would have the potential to generate impacts which may be considered as a significant effect to the environment, although mitigation measures or changes to the Project's physical or operational characteristics would reduce these impacts below the applicable threshold.
- **Significant and Unavoidable.** The Project would cause a substantial adverse effect on the environment, and no feasible mitigation measures are available to reduce the impact to a less than significant level.

5.0.3.2 Treatment of County and City Land Use Plans, Policies, and Regulations

The following explains the methodology for treatment of County and City land use plans, policies, and regulations in the EIR's analysis of the proposed General Plan and BIG.

Analysis of the Proposed General Plan in the EIR

Lands Already in the City. Future development on land already in the City (i.e., within the existing City limits, approximately 41 square miles) would be subject to the City's proposed General Plan goals and policies and the Code of the City of Barstow (Barstow Code) regulations and standards. Therefore, to the extent that the application of existing land use plans, policies, and regulations is a factor in determining impact significance under the thresholds used in this EIR, the City's existing plans, policies, and regulations constitute the existing conditions against which the significance of impacts of the proposed General Plan are determined. Following its adoption, the proposed General Plan policies would apply to future development.

SBLAFCO Action Areas/Lands Proposed for Annexation. As discussed in detail in **Section 3.0: Project Description**, the proposed General Plan proposes SBLAFCO Actions A and B, which include annexation of approximately 2,785 acres to the City of Barstow. All 2,785 acres proposed for annexation are within the City's SOI. If SBLAFCO approves the General Plan's proposed annexations, the County of San Bernardino Countywide Plan's Policy Plan (CWP) goals and policies and the County Code regulations identified in **Section 5.1** through **Section 5.17** would not apply to the proposed annexation areas, which instead would be subject to the proposed General Plan goals and policies and the Barstow Code. Therefore, to the extent that application of existing land use plans, policies, and regulations is a factor in determining impact significance under the thresholds used in this EIR, the County's existing land use plans, policies, and regulations constitute the existing conditions against which the significance of impacts of the proposed General Plan's annexation of approximately 2,785 acres of unincorporated County land into the City are determined.

Analysis of BIG in the EIR

BIG footprint jurisdictional areas are summarized in **Table 3-2: Existing Jurisdictional Areas – BIG** and depicted on **Figure 3-2: Local Vicinity Map** in **Section 3.0: Project Description**. As summarized in the table and shown in the figure, a portion of BIG off-site improvements are within the County. As such, these lands are currently subject to CWP goals and policies and County Code regulations and standards.

Lands Already in the City or SBLAFCO Action Areas/Proposed for Annexation. As discussed above, the proposed General Plan proposes annexation of approximately 2,785 acres of land within the unincorporated County into the City, of which 2,676 acres are within the proposed BIG Specific Plan area. Inclusive of the approximately 1,659 acres within the BIG Specific Plan area that are already within the City limits, the BIG Specific Plan would total approximately 4,300 acres.[1] The City's application to SBLAFCO for approval of annexation of approximately 2,676 acres within the BIG Specific Plan area into the City would include prezoning of that area to BIG Specific Plan zone and application of the City's proposed General Plan goals and policies and Barstow Code regulations and standards, including the BIG Specific Plan's proposed comprehensive development plan, standards, and implementation program. As such, development of BIG within the portion of the BIG Specific Plan area that is proposed to be annexed into the City, as well as development of BIG within the portion of the BIG Specific Plan area that is already within the City limits, would be subject to the City's proposed General Plan goals and policies and Barstow Code regulations and standards. Therefore, to the extent that application of existing land use plans, policies, and regulations is a factor in determining impact significance under the thresholds used in this EIR, the City's proposed General Plan land use plan and policies and the Barstow Code regulations and standards constitute the existing conditions against which the significance of impacts of BIG improvements in the portion of the BIG Specific Plan area that is proposed for annexation to the City, as well as those in the portion of the BIG Specific Plan area that is already within the City limits are determined.

[1] Sums may not total due to rounding. Off-site improvement acreages are based on GIS data and are therefore estimates. Specific Plan acreages are based on survey data. Although the total Specific Plan acreage is 4,335, throughout the EIR, the Specific Plan acreage is referred to as 4,300 acres.

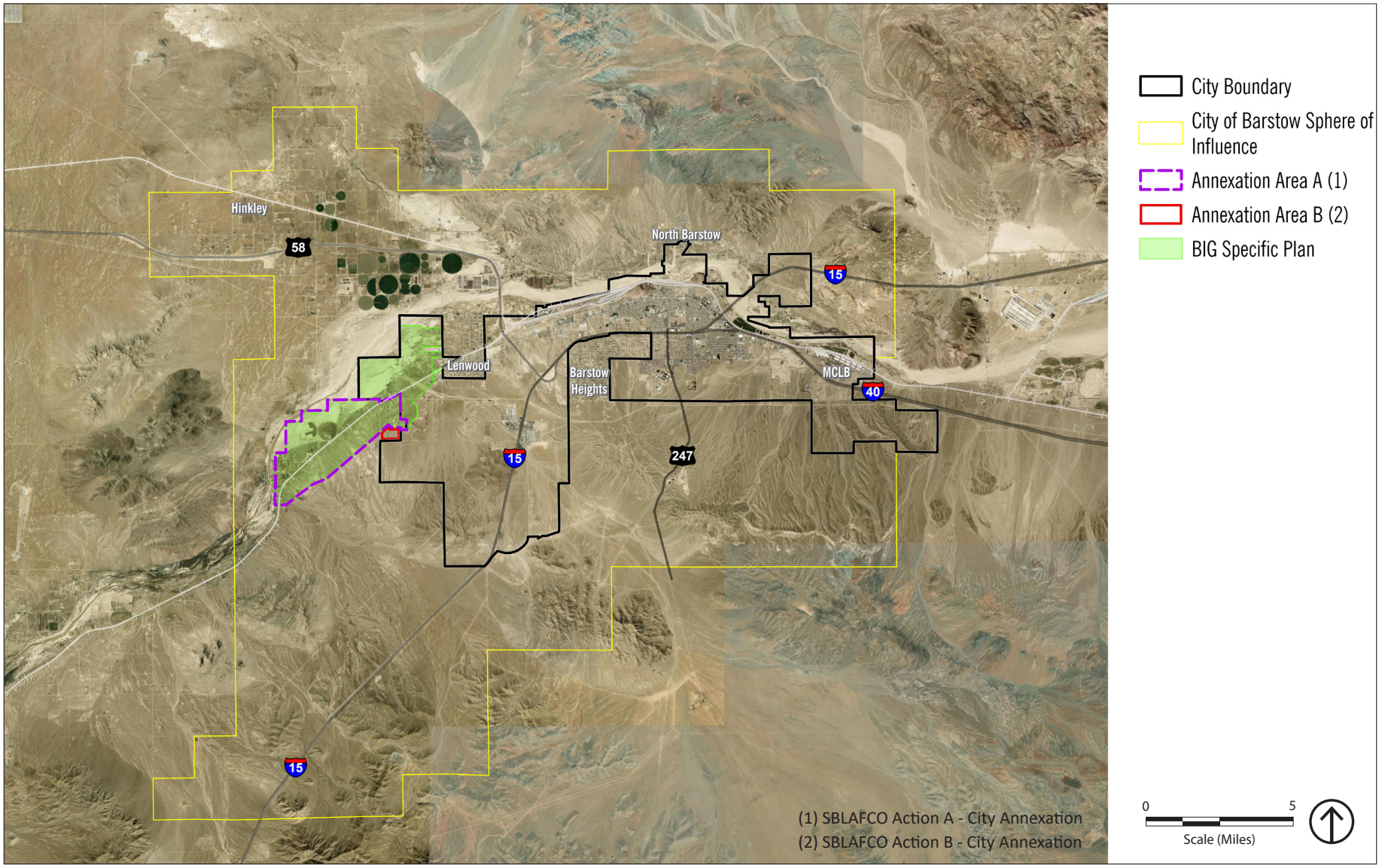
Unincorporated Lands Remaining in the County. Approximately 660 acres of BIG's off-site improvements would occur on land that is currently within unincorporated County jurisdiction that would not be annexed to the City as a part of the Project and so would continue to be subject to CWP goals and policies and County Code regulations and standards. Therefore, to the extent that application of existing land use plans, policies, and regulations is a factor in determining impact significance under the thresholds employed in this EIR, the County's existing land use plans, policies, and regulations constitute the existing conditions against which the significance of impacts of BIG off-site improvements are determined.

5.0.4 TERMINOLOGY USED FOR GEOGRAPHIC AREAS OF THE PROJECT

The EIR uses the following terminology in defining geographic areas involved in their assessment of impacts for the Project:

- **City Limits**. **Figure 5-1: City and Sphere of Influence Boundary** depicts the existing Barstow municipal boundaries (City limits), which cover approximately 41 square miles and are as recognized by the SBLAFCO.
- **Sphere of Influence (SOI). Figure 5-1**: City and Sphere of Influence Boundary depicts the City's SOI, which consists of 123 square miles within unincorporated County. The Project does not propose to expand the SOI as recognized by the SBLAFCO.
- **Proposed General Plan Area**. The existing City limits (41 square miles) plus the City's SOI (123 square miles) is approximately 163 square miles.
- **BIG Specific Plan Area.** The BIG Specific Plan area, which totals approximately 4,300 acres,[2] consists of approximately 1,659 acres currently within the City limits and approximately 2,676 acres currently within the unincorporated County that are proposed to be annexed into the City. BIG's analysis considers the environmental impacts of both on-site and off-site construction and operations, as defined below:
  - **"On-site"** refers to the area within the BIG Specific Plan area.
  - **"Off-site"** refers to areas within the BIG footprint that are outside the BIG Specific Plan area.
- **SBLAFCO Actions A and B/Annexation Area(s). Figure 5-1**: City and Sphere of Influence Boundary depicts the proposed General Plan's proposed annexation areas, which are south and west of Barstow's City limits within unincorporated County lands.

[2] Ibid.



Sources:
County of San Bernardino, 2023; City of Barstow, 2024.

Figure 5-1
City and Sphere of Influence Boundary