7.0 OTHER CEQA CONSIDERATIONS

State CEQA Guidelines § 15126.2 requires consideration and discussion of a project's significant environmental effects, including the direct and indirect effects, as well as the short- and long-term effects. The Project's significant environmental effects pursuant to State CEQA Guidelines § 15126.2(a) are addressed in **Sections 5.1: Aesthetics** through **5.17: Utilities and Service Systems**.

State CEQA Guidelines § 15126.2, subdivisions (b) through (e), also require consideration and discussion of the following other project effects:

- Energy Impacts (§ 15126.2[b]);
- Significant Environmental Effects Which Cannot be Avoided if the Proposed Project is Implemented (§ 15126.2[c]);
- Significant Irreversible Environmental Changes Which Would be Involved in the Proposed Project Should it be Implemented (§ 15126.2[d]); and
- Growth-Inducing Impact of the Proposed Project (§ 15126.2[e]).

CEQA requires preparation of an EIR when certain specified impacts may result from construction or implementation of a project.

The Project's energy impacts pursuant to 15126.2(b) are addressed in **Section 5.6: Energy**. The other effects of the Project, concerning which discussion and consideration are required under State CEQA Guidelines § 15126.2(c) through (e), are addressed herein, below.

7.1 SIGNIFICANT ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED

State CEQA Guidelines § 15126(b) requires that the EIR describe any significant environmental effects of a proposed project that cannot be avoided if the proposed project is implemented, including those which can be mitigated but not reduced to a level of insignificance. These effects are referred to as the Project's "significant and unavoidable impacts." The Project's environmental impacts have been mitigated to less than significant levels with implementation of specified mitigation measures (MMs), to the extent feasible, provided in **Section 5.1** through **Section 5.17**. However, certain impacts would remain significant despite mitigation and would result in a significant and unavoidable environmental impact. **Table 1-1: Summary of Significant Impacts and Proposed Mitigation Measures** in **Section 1.0: Executive Summary summarizes** the Project's impacts, mitigation measures, and levels of significance before and after mitigation. While mitigation measures would reduce the level of impact, the impacts identified below would remain significant, unavoidable, and adverse after mitigation measures are incorporated.

Proposed General Plan

With implementation of the proposed General Plan, the following significant and unavoidable impacts would occur:

Aesthetics

- **Impact 5.1-3: General Plan**, concerning visual character, would be significant and unavoidable. Because the proposed General Plan would allow for significant changes to the visual character in the proposed General Plan area, a significant unavoidable impact would occur despite the implementation of **MM BIG AES-1**. As discussed in **Section 5.1**, due to the large scale of the proposed General Plan area, no other feasible mitigation measures exist that would reduce impacts to a less than significant level.
- **Impact 5.1-4: General Plan**, concerning substantial light or glare impacts, would be significant and unavoidable. Because the proposed General Plan 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. As discussed in **Section 5.1**, no feasible mitigation measures exist that would reduce impacts to a less than significant level.

Agriculture and Forestry Resources

- **Impact 5.2-1: General Plan**, concerning the conversion of prime farmland, unique farmland, or farmland of statewide importance (Agricultural Land), would be significant and unavoidable. Future development in the proposed General Plan area has the potential to result in the loss of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland (the three categories of farmland considered significant under CEQA) despite implementation of **MM GP AG-1**. As discussed in **Section 5.2: Agriculture and Forestry Resources**, due to the large scale of the proposed General Plan area, no other feasible mitigation measures exist that would reduce impacts to a less than significant level.
- **Impact 5.2-2: General Plan,** concerning conflicts with existing zoning for agricultural use, impacts would be significant and unavoidable. The proposed General Plan includes annexations where land would be converted from existing County zoning for agricultural uses to City zoning for non-agricultural uses. There is no existing zoning for agricultural use within the City. As discussed in **Section 5.2**, due to limited existing agricultural resources in the City and surrounding area, there are no feasible mitigation measures that would reduce impacts to a less than significant level.

Air Quality

- **Impact 5.3-1: General Plan,** concerning conflicting with or obstructing implementation of applicable air quality plans, would be significant and unavoidable. Implementation of the proposed General Plan would allow for development pursuant to the proposed land use plan to contribute to an increase in frequency or severity of air quality violations and delay attainment; therefore, impacts would be significant and unavoidable despite the implementation of **MM GP AQ-1** and **MM GP AQ-2**. As discussed in **Section 5.3: Air Quality**, due to the large scale of the proposed General Plan, no other feasible mitigation measures exist that would reduce impacts to a less than significant level.
- **Impact 5.3-2: General Plan,** concerning cumulatively considerable net increases of criteria pollutants, would be significant and unavoidable. Implementation of the proposed General Plan would result in an increase in overall land use development which would increase long-term

operational emissions; therefore, impacts would be significant and unavoidable despite the implementation of **MM GP AQ-1** and **MM GP AQ-2**. As discussed in **Section 5.3**, due to the large scale of the proposed General Plan area, no other feasible mitigation measures exist that would reduce impacts to a less than significant level.

- **Impact 5.3-3: General Plan**, concerning the exposure of sensitive receptors to substantial pollutant concentrations, would be significant and unavoidable. Implementation of the proposed General Plan could cumulatively expose sensitive receptors to substantial concentrations of TACs; therefore, impacts would be significant and unavoidable despite the implementation of **MM GP AQ-3**. As discussed in **Section 5.3**, no other feasible mitigation measures exist that would reduce impacts to a less than significant level.

Cultural Resources

- **Impact 5.5-1: General Plan**, concerning historic resources, would be significant and unavoidable. Implementation of the proposed General Plan could result in demolition, significant alteration, and/or destruction of historic resources; therefore, impacts would be significant and unavoidable despite the implementation of **MM GP CUL-1** through **MM GP CUL-4**. As discussed in **Section 5.5: Cultural Resources**, **MM GP CUL-1** through **MM GP CUL-4** and proposed General Plan policies may not be sufficient to reduce the impacts of future development projects under the proposed General Plan, and no other feasible mitigation measures exist that would reduce impacts to a less than significant level.

- **Impact 5.5-2: General Plan,** concerning archaeological resources, would be significant and unavoidable. Implementation of the proposed General Plan could result in demolition, significant alteration, and/or destruction of archaeological resources; therefore, impacts would be significant and unavoidable despite the implementation of **MM GP CUL-3** and **MM GP CUL-4**. As discussed in **Section 5.5**, **MM GP CUL-1** through **MM GP CUL-4** and proposed General Plan policies may not be sufficient to reduce the impacts of future development projects under the proposed General Plan, and no other feasible mitigation measures exist that would reduce impacts to a less than significant level.

Geology, Soils, and Mineral Resources

- **Impact 5.7-10: General Plan**, concerning mineral resources, would be significant and unavoidable. Implementation of the proposed General Plan would result in the inability to extract mineral resources within lands designated as Mineral Resources Zone (MRZ-1) and MRZ-2b; therefore, impacts would be significant and unavoidable. As discussed in **Section 5.7: Geology, Soils, and Mineral Resources**, no feasible mitigation measures exist that would reduce impacts to a less than significant level.

- **Impact 5.7-11: General Plan**, concerning locally-important mineral resource recovery sites, would be significant and unavoidable. Implementation of the proposed General Plan would result in the inability to extract mineral resources within lands designated as MRZ-1 and MRZ-2b; therefore, impacts would be significant and unavoidable. As discussed in **Section 5.7**, no feasible mitigation measures exist that would reduce impacts to a less than significant level.

Greenhouse Gas Emissions

- **Impact 5.8-1: General Plan,** concerning the generation of greenhouse gas (GHG) emissions, would be significant and unavoidable. Implementation of the proposed General Plan would exceed MDAQMD's brightline threshold and would not achieve the GHG reduction targets of Assembly Bill (AB) 1279; therefore, impacts would be significant and unavoidable. Despite the implementation of **MM GP GHG-1.** As discussed in **Section 5.8: Greenhouse Gas Emissions**, no other feasible mitigation measures exist that would reduce impacts to a less than significant level**.**
- **Impact 5.8-2: General Plan**, concerning conflicting with an applicable plan, policy, or regulation adopted to reduce GHG emissions, would be significant and unavoidable. Implementation of the proposed General Plan would conflict with the 2022 California Air Resources Board (CARB) Scoping Plan; therefore, impacts would be significant and unavoidable despite the implementation of **MM GP AG-1**. As discussed in **Section 5.8**, no other feasible mitigation measures exist that would reduce impacts to a less than significant level.

Noise and Vibration

- **Impact 5.12-1: General Plan,** concerning generation of substantial construction and traffic noise, would be significant and unavoidable. Implementation of the proposed General Plan would result in temporary substantial increases in construction noise proximate to sensitive uses and significant traffic noise increases along several roadways; therefore, impacts would be significant and unavoidable despite the implementation of **MM GP NOI-1** and **MM GP NOI-2**. As discussed in **Section 5.12: Noise and Vibration**, no other feasible mitigation measures exist that would reduce impacts to a less than significant level.

Transportation

- **Impact 5.15-2: General Plan,** concerning conflicting with CEQA Guidelines § 15064.3(b), would be significant and unavoidable. Given the uncertainty of the effectiveness of implementing the proposed mitigation measures at a citywide level in the short term, impacts would be significant and unavoidable. As discussed in **Section 5.15: Transportation**, no feasible mitigation measures exist that would reduce impacts to a less than significant level.

Tribal Cultural Resources

- **Impact 5.16-1: General Plan,** concerning tribal cultural resources with listed or eligible for listing, would be significant and unavoidable. Implementation of the proposed General Plan's mitigation measures may not be sufficient in reducing impacts to historically significant tribal cultural resources; therefore, impacts would be significant and unavoidable despite the implementation of **MM GP CUL-1** and **MM GP CUL-3**. As discussed in **Section 5.16: Tribal Cultural Resources**, no other feasible mitigation measures exist that would reduce impacts to a less than significant level.
- **Impact 5.16-2: General Plan**¸ concerning tribal cultural resources determined by the lead agency to be significant, would be significant and unavoidable. Implementation of the proposed General Plan's mitigation measures may not be sufficient in reducing impacts to resources of significance to California Native American tribes; therefore, impacts would be significant and unavoidable

despite the implementation of **MM GP CUL-1** and **MM GP CUL-3**. As discussed in **Section 5.16**, no other feasible mitigation measures exist that would reduce impacts to a less than significant level.

Utilities and Service Systems

- **Impact 5.17 GP-1,** concerning requiring the relocation or construction of utilities and service systems, would be significant and unavoidable. The environmental effects resulting from construction of utility and service system facilities to accommodate future development under the proposed General Plan are discussed as part of the proposed General Plan's overall environmental analyses in **Sections 5.1** through **5.17**. The proposed General Plan's environmental impacts have been largely mitigated to less than significant levels with implementation of standard development procedures included in the Barstow Code and engineering standards, as well as mitigation measures explained in each EIR section. However, certain impacts (i.e., concerning aesthetics, agricultural resources, air quality, cultural resources, noise and vibration, transportation, and tribal cultural resources) would remain significant despite the application of mitigation measures. Therefore, the environmental impacts of utility and service system facility upgrades and maintenance consistent with the proposed General Plan would be significant and unavoidable.

Barstow International Gateway (BIG)

With implementation of BIG, the following significant and unavoidable impacts would occur:

Aesthetics

- **Impact 5.1-3: BIG**, concerning visual character, would be significant and unavoidable. Implementation of BIG would substantially change the overall visual quality of the existing environment; therefore, a significant unavoidable impact would occur despite the implementation of **MM BIG AES-1**. As discussed in **Section 5.1: Aesthetics**, there are no other feasible mitigation measures that would reduce impacts to a less than significant level.
- **Impact 5.1-4: BIG**, concerning the creation of substantial light or glare, would be significant and unavoidable. Because BIG would create a new source of substantial light and glare that would adversely affect day or nighttime views in the area, a significant unavoidable impact would occur despite the implementation of **MM BIG AES-1**. Due to the large scale of the Project, no other feasible mitigation measures exist that would reduce impacts to a less than significant level.

Air Quality

- **Impact 5.3-1: BIG**, concerning conflicting with or obstructing implementation of applicable air quality plans, would be significant and unavoidable. Implementation of BIG would result in emissions that exceed air quality emissions standards despite compliance with State air quality standards and Mojave Desert Air Quality Management District (MDAQMD) rules to limit air emissions; therefore, impacts would be significant and unavoidable despite the implementation of **MM BIG AQ-1** through **MM BIG AQ-14**. As discussed in **Section 5.3: Air Quality**, there are no other feasible mitigation measures that would reduce impacts to a less than significant level.

- **Impact 5.3-2: BIG**, concerning cumulatively considerable net increases of criteria pollutants, would be significant and unavoidable. Implementation of BIG would result in construction and operational emissions that would remain above MDAQMD thresholds. Construction and operational impacts would be significant and unavoidable despite the implementation of **MM BIG AQ-1** through **MM BIG AQ-14**. No other feasible mitigation measures exist that would reduce impacts to a less than significant level.
- **Impact 5.3-3: BIG**, concerning the exposure of sensitive receptors to substantial pollutant concentrations, would be significant and unavoidable. Implementation of BIG would result in a significant and unavoidable impact relating to the exposure of sensitive receptors to substantial concentrations of air pollutants; therefore, impacts would be significant and unavoidable despite the implementation of **MM BIG AQ-1** through **MM BIG AQ-14**. No other feasible mitigation measures exist that would reduce impacts to a less than significant level.
- In consideration of the above significant and unavoidable impacts, BIG would result in a cumulatively considerable net increase of criteria pollutants for which the BIG region is in nonattainment under an applicable State or federal ambient air quality standard and expose sensitive receptors to substantial pollutant concentrations. Therefore, BIG would result in significant and unavoidable impacts regarding air quality planning, criteria pollutant emissions, and exposure of sensitive populations.

Cultural Resources

- **Impact 5.5-1: BIG,** concerning historic resources, would be significant and unavoidable. Implementation of BIG would result in significant and unavoidable impacts concerning potential adverse changes in the significance of known and unknown historical resources; therefore, impacts would be significant and unavoidable despite the implementation of **MM BIG CUL-1** through **MM BIG CUL-7** identified in **Section 5.5: Cultural Resources**. These mitigation measures and proposed General Plan policies may not be sufficient to reduce impacts of BIG construction, and no other feasible mitigation measures exist that would reduce impacts to a less than significant level.
- **Impact 5.5-2: BIG,** concerning archaeological resources, would be significant and unavoidable. Implementation of BIG could result in demolition, significant alteration, and/or destruction of archaeological resources; therefore, impacts would be significant and unavoidable despite the implementation of **MM BIG CUL-1** through **MM BIG CUL-7**. These mitigation measures and proposed General Plan policies may not be sufficient to reduce the impacts of BIG construction, and no other feasible mitigation measures exist that would reduce impacts to a less than significant level.

Noise and Vibration

- **Impact 5.12-1: BIG**, concerning substantial temporary noise levels, would be significant and unavoidable. Construction activities associated with the 33 kilovolt (kV) line, when located at close distances to residences (i.e., within 50 feet), would result in 8-hour Leq (equivalent sound level) noise levels up to 84.9 dBA (A-weighted decibels), in excess of the Federal Transit Administration (FTA) 80 dBA residential noise standard. Temporary noise barriers for construction of the 33 kV transmission line would be considered infeasible mitigation, and a significant and unavoidable impact would occur during these activities. Because BIG operational noise could result in a significant and unavoidable impact concerning interior noise during a “windows open” condition despite implementation of mitigation outlined in **Section 5.12: Noise and Vibration**; therefore, impacts would be significant and unavoidable despite the implementation of **MM BIG NOI-1** and **MM BIG NOI-2**. As discussed in **Section 5.12**, no other feasible mitigation measures exist that would reduce impacts to a less than significant level.

Tribal Cultural Resources

- **Impact 5.16-1: BIG,** concerning tribal cultural resources with listed or eligible for listing, would be significant and unavoidable. Implementation of BIG mitigation measures may not be sufficient in reducing impacts to historically significant tribal cultural resources; therefore, impacts would be significant and unavoidable despite the implementation of **MM BIG CUL-1** through **MM BIG CUL-8**. As discussed in **Section 5.16: Tribal Cultural Resources**, there are no other feasible mitigation measures that would reduce impacts to a less than significant level.
- **Impact 5.16-2: BIG**, concerning tribal cultural resources determined by the lead agency to be significant, would be significant and unavoidable. Despite compliance with the established regulatory framework and implementation of mitigation, such measures may not be sufficient to reduce construction impacts to archaeological resources to a less than significant level. As such, BIG construction activities would result in significant and unavoidable impacts concerning potential adverse changes in the significance of known and unknown tribal cultural resources that are eligible for listing. As discussed in **Section 5.16**, no other feasible mitigation measures exist that would reduce impacts to a less than significant level**.**

Utilities and Service Systems

- BIG construction and operations would require relocation/construction of water, wastewater, and stormwater conveyance infrastructure and utility infrastructure. 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, agriculture, air quality, cultural resources, geology and mineral resources, greenhouse gas emissions, noise and vibration, transportation, and tribal cultural resources) would remain significant despite implementation of mitigation measures, thus would 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.

7.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

State CEQA Guidelines § 15126.2(d) requires an EIR to address significant irreversible environmental changes, which would be caused by a proposed project should it be implemented. State CEQA Guidelines § 15126.2(d) further states that irreversible environmental changes may result from use of nonrenewable resources during all phases of a project. Generally, State CEQA Guidelines § 15126.2(d) states that a project would cause significant irreversible environmental changes if it would:

- Involve a large commitment of nonrenewable resources in a way that would make their removal or nonuse thereafter unlikely;
- Result in primary and secondary impacts (such as a highway improvement, which provides access to a previously inaccessible area) that would generally commit future generations to similar uses;
- Result in irreversible damage from environmental accidents associated with the project; and
- Result in irretrievable commitments of resources such that the current consumption is not justified.

Would the Project involve a large commitment of nonrenewable resources in a way that would make their removal or nonuse thereafter unlikely?

Non-renewable resources include land, agricultural resources (i.e., prime farmland); cultural resources (i.e., historic resources); minerals such as aggregates (e.g., sand, gravel, clay, limestone, gypsum, and crushed stone); fossil fuels such as oil and natural gas; and metals such as copper, aluminum, and steel. Additionally, certain resources used to generate electricity (i.e., fossil fuels) are non-renewable. For the purposes of the analysis below, it is assumed that development under the Project (both the proposed General Plan and BIG) would involve commitment of these aforementioned non-renewable resources. The commitment of nonrenewable resources required for Project construction and operation would generally limit the availability of such resources for future generations or for other uses during the lifetimes of the future developments and BIG.

Proposed General Plan

The proposed General Plan is strictly a policy document and does not propose construction activities that would entail the commitment of nonrenewable resources. While the proposed General Plan does not propose new development, the proposed Land Use Plan would allow for the development of areas within the City and its Sphere of Influence (SOI). Further, future development under the proposed General Plan would induce population and job growth directly through the proposed Land Use Plan that would accommodate new land uses. Therefore, construction activities associated with future development under the proposed General Plan would result in a large commitment of nonrenewable construction materials, such as minerals (e.g., aggregates such as sand, gravel, and other bulk materials), fossil fuels (e.g., petroleum-based diesel fuel or gasoline used in construction equipment), metals, and electric power supplied by non-renewable energy sources (e.g., fossil fuels). Construction of future development under the proposed General Plan would involve a commitment of nonrenewable resources such as the following:

- **Land.** Future development in accordance with the proposed General Plan is a long-term irreversible commitment of vacant parcels of land or redevelopment of existing developed land in the City and its unincorporated SOI. Given the low likelihood that the land would revert to lower intensity uses or to its current form, the proposed General Plan would generally commit future generations to these environmental changes. This large commitment of vacant lands would be permanent. Therefore, the nonuse of these lands after the buildout of the proposed General Plan would be unlikely.
- **Agricultural Resources.** The conversion of existing agricultural land to non-agricultural uses under the proposed Land Use Plan would limit the availability of agricultural resources for future generations. As discussed in **Section 5.2: Agriculture and Forestry Resources**, future development in the proposed General Plan area has the potential to result in the loss of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland ("Important Farmland"), the three categories of farmland considered significant under CEQA. This large commitment of lands containing significant agricultural resources would be permanent. Therefore, the nonuse of these lands after the buildout of the proposed General Plan would be unlikely.
- **Cultural Resources** (e.g., historic and archaeological). Future development under the proposed General Plan has the potential to impact historic and archaeological resources. Additionally, due to the long-term nature of buildout under the proposed General Plan, buildings may become eligible for historic designation and therefore be impacted; refer to **Section 5.5: Cultural Resources**. Therefore, future development facilitated by the proposed General Plan may require the commitment of cultural resources, which may include the demolition or degradation of these resources. This large commitment of cultural resources would be permanent. Therefore, the nonuse of these resources after the buildout of the proposed General Plan would be unlikely.
- **Mineral Resources.** Construction activities associated with future development under the proposed General Plan would require the consumption of mineral resources such as aggregates (e.g., sand, gravel, and other bulk materials). Additionally, BIG, a future development under the proposed General Plan, would require the commitment of land designated for mineral resources. As discussed in **Section 5.7: Geology, Soils, and Mineral Resources**, the proposed General Plan would permit the development of lands currently designated as Mineral Resource Zone (MRZ) 1 and MRZ-2b, thereby reducing the potential for mining of the resource. This large commitment of lands containing mineral resources would be permanent. Therefore, the nonuse of these lands after the buildout of the proposed General Plan would be unlikely.
- **Fossil Fuels.** Construction activities associated with future development under the proposed General Plan would require the use of petroleum-based diesel fuel (for heavy-duty construction equipment and truck hauling trips) and gasoline fuels (for on-road worker commute vehicle trips). However, the proposed General Plan would promote the efficient use of fossil fuels by complying with regulations and implementing the proposed General Plan policies related to land use and transportation planning and design, energy efficiency, public and active transit, and renewable energy generation that would contribute to minimizing building and transportation-related

energy. Because the use of these nonrenewable resources would be vital for construction activities, their removal or nonuse thereafter are unlikely.

- **Electric Power.** Construction activities associated with future development under the proposed General Plan would require the use of electric power supplied by non-renewable energy sources (e.g., fossil fuels) for lighting, buildings, cranes, electric hostlers, electric vehicle charging for material handling, and forklifts. Because the use of electric power, generated by nonrenewable resources, would be vital for construction activities, its removal or nonuse thereafter is unlikely.

Additionally, operations associated with future development under the proposed General Plan would require long-term commitment of the following nonrenewable resources:

- **Fossil Fuels.** Operations associated with future development under the proposed General Plan would require the use of petroleum-based diesel fuel (for heavy-duty truck hauling trips and vendor trips) and gasoline fuels (for on-road worker commute vehicle trips). However, the proposed General Plan would promote the efficient use of fossil fuels by complying with regulations and implementing the proposed General Plan policies related to land use and transportation planning and design, energy efficiency, public and active transit, and renewable energy generation that would contribute to minimizing building and transportation-related energy. Because the use of these nonrenewable resources would be vital for operations, their removal or nonuse thereafter are unlikely.
- **Electric Power.** Operation associated with future development under the proposed General Plan would require the use of electric power supplied by non-renewable energy sources (e.g., fossil fuels) for manufacturing, lighting, heating and cooling, running equipment, high power machinery, and other appliances. Because the use of electric power generated by nonrenewable resources would be vital for operations, its removal or nonuse thereafter is unlikely.

It is noted that the proposed General Plan's planning horizon year is 2048 and development under the proposed General Plan would be constructed over 25 years. As such, the proposed General Plan would provide for long-term planning, and the use of resources under the proposed General Plan would occur gradually. Additionally, the long-term nature of the proposed General Plan's buildout makes the removal or nonuse of the above-mentioned resources unlikely. Therefore, in consideration of the above, the proposed General Plan would result in a large commitment of nonrenewable resources in a way that would make their removal or nonuse unlikely thereafter.

Barstow International Gateway

BIG's proposed uses and improvements are described in detail in **Section 3.0: Project Description**. BIG would involve commitment of non-renewable resources during the construction phase and throughout its operational lifetime.

BIG construction would involve commitment of the following non-renewable resources:

- **Land.** Implementation of BIG would result in the commitment of land resources. Its direct effect would include the replacement of vacant lands with the proposed BIG Specific Plan area improvements. Its direct effect would also include changes to infrastructure to support the proposed land uses, including off-site (e.g., stormwater drainage, utilities, and circulation/ roadway) improvements. This large commitment of land would be permanent. Therefore, the nonuse of these lands after BIG's construction would be unlikely.

- **Agricultural Resources.** As discussed in **Section 5.2**, implementation of BIG would require the conversion of approximately 313 acres of Agricultural Land within the BIG footprint to non-agricultural land uses. This large commitment of lands containing agricultural resources would be permanent. Therefore, the nonuse of these lands after BIG's construction would be unlikely.
- **Cultural Resources.** As discussed in **Section 5.5**, there are 204 cultural resources within the BIG footprint. BIG's construction has the potential to adversely affect the status of these cultural resources. This large commitment of cultural resources would be permanent. Therefore, the nonuse of these resources after the buildout of the proposed General Plan would be unlikely.
- **Minerals.** BIG construction activities would require the consumption of mineral resources such as aggregates (e.g., sand, gravel, and other bulk materials). Additionally, implementation of BIG would require the commitment of land designated for mineral resources. As discussed in **Section 5.7: Geology, Soils, and Mineral Resources**, the BIG footprint overlies designated MRZs Class 2b and Class 3a for Concrete Aggregate Resources. BIG would involve the commitment of the overlying land to industrial/railway uses, making the future utilization of these resources unlikely. However, as stated in **Section 5.7**, BIG would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan because mining the ARA-15 area within the BIG footprint would be considered incompatible with the City of Barstow 2015-2020 General Plan (2015 General Plan) land use plan, as mining operations are not permitted within the Estate Residential zone; refer to **Section 5.7**. In addition, Countywide Plan policies relating to mining would no longer apply to County-delineated MRZs within that portion of the BIG Specific Plan area, which would be annexed into the City. This large commitment of lands containing mineral resources would be permanent. Therefore, the nonuse of these lands after BIG's construction would be unlikely.
- **Fossil Fuels.** BIG's consumption of fossil fuels during construction would include the use of petroleum-based diesel fuel (for heavy truck hauling trips, vendor trips, and off-road construction equipment) and gasoline fuel (for on-road worker commute trips). Because the use of these nonrenewable resources would be vital for construction activities, their removal or nonuse thereafter are unlikely.
- **Metals.** Construction of BIG would involve the consumption of metals (e.g., steel, copper, lead, etc.) for construction of buildings, rail lines, utility, and circulation/roadway infrastructure improvements. Due to the highly recyclable nature of metals, the possibility exists to reclaim a portion of these materials at the end of BIG's operational life. BIG would comply with the California Green Building Standards Code (CALGreen Code), which includes a waste reduction requirement of 65 percent of nonhazardous construction and demolition waste (CALGreen Code CCR Title 24). Therefore, although BIG construction would involve the consumption of

nonrenewable metals, the nonuse of metals throughout the course of BIG's operational lifetime is likely.

- **Electric Power.** Construction of BIG would require electric power supplied by non-renewable energy sources (e.g., fossil fuels), for on-site groundwater wells (to provide non-potable water use for construction activities), equipment and tools, lighting, and other necessary facilities (e.g., temporary offices). The energy consumed during BIG construction and operations is discussed in detail in **Section 5.6: Energy**. Because the use of electric power, generated by nonrenewable resources, would be vital for construction activities, its removal or nonuse thereafter is unlikely.

BIG operations would involve a commitment of the following nonrenewable resources:

- **Fossil Fuels.** BIG operations would require the use of petroleum-based diesel fuel (for heavy-duty truck hauling trips and vendor trips) and gasoline fuels (for on-road worker commute vehicle trips). However, BIG would promote the efficient use of fossil fuels through regulatory compliance (e.g., Building Energy Efficiency Standards, CALGreen, the California Renewables Portfolio Standard, and the Corporate Average Fuel Economy standards), in addition to compliance with the regulatory requirements discussed in **Section 5.6**. Although BIG would endeavor to utilize fossil fuels efficiently, their use would be vital for operations, making their removal or nonuse thereafter unlikely.
- **Electric Power.** BIG operations would require the use of electric power supplied by non-renewable energy sources (e.g., fossil fuels for the rail yard [i.e., lighting, buildings, cranes, and electric hostlers] and the transload warehouse center [e.g., lighting, electric vehicle charging for material handling, and forklifts]). However, BIG also includes a substantial amount of renewable energy through an on-site solar farm, Title 24 building solar generation, and additional solar beyond Title 24 compliance discussed in **Section 5.6**, thereby reducing BIG's reliance on non-renewable sources of electric power. Renewable energy would not result in energy resource removal or nonuse. Although BIG would endeavor to utilize electric power efficiently, its use would be vital for operations, making its removal or nonuse thereafter unlikely.

Therefore, in consideration of the above, BIG would result in a commitment of nonrenewable resources in a way that would make their removal or nonuse unlikely thereafter.

Would the Project result in primary and secondary impacts (such as a highway improvement, which provides access to a previously inaccessible area) that would generally commit future generations to similar uses?

Proposed General Plan

The proposed General Plan is a policy document and does not propose construction activities that would entail the commitment of nonrenewable resources. While the proposed General Plan does not propose new development, the proposed Land Use Plan would support the development of areas within the City and its SOI. Development under the proposed General Plan would involve the construction of structures, facilities, and infrastructure on land that is currently undeveloped. Future development, facilitated by the proposed General Plan and its Land Use Plan, would result in the long-term and permanent commitment of land for urban uses, as discussed above. Therefore, the proposed General Plan's primary and secondary impacts, through the establishment of infrastructure, environmental changes, and resource commitments, could constrain future generations' ability to transition the land to different uses. Once the land is developed, it is unlikely to return to its previous condition. Therefore, the proposed General Plan would generally commit future generations to similar uses.

Barstow International Gateway

As discussed above, following BIG's development, an international gateway facility would occupy currently mostly vacant lands, and off-site rail and non-rail improvements would be developed to support the proposed land uses. Despite incorporation of mitigation measures, BIG would result in significant and unavoidable impacts; see **Section 7.1: Significant Environmental Effects Which Cannot Be Avoided**. However, BIG's significant and unavoidable impacts would generally not commit future generations to similar rail or industrial uses. BIG's proposed structures and improvements could be removed at the end of BIG's operational lifetime. None of the proposed improvements are incapable of removal or nonuse after the end of BIG operational lifetime. Further, although the proposed General Plan's land use designation change and prezoning would intend for industrial uses within the BIG Specific Plan area (see proposed General Plan discussion above), they would not preclude future proposals for General Plan land use designation or zone changes, thus, would not commit future generations to rail or industrial uses.

This EIR has analyzed the potential for contamination during routine operations, construction, and the accidental release of hazardous materials and wastes (HMW). With respect to the routine transport, use, disposal, or accidental release of HMW, BIG would have a less than significant impact to the public within incorporation of **MM BIG AQ-1**, **MM BIG HAZ-2**, and **MM BIG HAZ-3**. As described in **Section 5.9: Hazards, Hazardous Materials, and Wildfire**, compliance with these mitigation measures and established regulatory framework, which includes the proposed General Plan policies concerning hazards and the regulations enforced by the Occupational Safety and Health Administration (OSHA), U.S. Environmental Protection Agency (U.S. EPA), the U.S. Department of Transportation (DOT), CalRecycle, and other agencies would minimize these potential impacts. Following U.S. EPA guidance for redevelopment of the BIG footprint, BIG would not commit future generations to similar uses due to potential contamination by HMW. According to U.S. EPA guidance, railfield properties present considerable opportunities for reuse and community revitalization and, in particular, redevelopment as open space and trails. The National Trail System Act (16 U.S.C. 1247[d]) provides a voluntary process under which a rail line can be converted to recreational trail. The National Trail System Act allows the federal government to regulate the disposition of soon-to-be abandoned railroad lines to preserve the right-of-way in case the need for future rail use arises and makes way for the development of alternative transportation uses for railway corridors, including trails. Therefore, related to HMW, BIG presents opportunities for redevelopment that would not commit future generations to similar uses.

In summary, BIG has the potential to result in primary and secondary impacts that generally commit future generations to similar uses. In particular, BIG would involve land entitlement that would commit the BIG Specific Plan area to industrial uses for future generations; refer to **Section 5.11**. However, none of the proposed improvements are incapable of removal or nonuse after the end of BIG operational lifetime. Further, although the proposed General Plan's land use designation change and prezoning would intend for industrial uses within the BIG Specific Plan area (see proposed General Plan discussion above), they would not preclude future proposals for General Plan land use designation or zone changes, thus, would not commit future generations to industrial uses. However, given the nature of BIG, the likelihood of returning the land to its original condition once it has been developed is low.

Would the Project result in irreversible damage from environmental accidents associated with the Project?

Proposed General Plan

Implementation of the proposed General Plan would result in an intensification of land uses compared to existing conditions, which would require the use, transportation, and storage of hazardous materials during construction and operation of projects. Environmental degradation could result from the release of hazardous materials caused by upset or accident conditions. While it is possible that environmental accidents would occur in association with project-specific development under the proposed General Plan, compliance with applicable federal, State, and local regulations and proposed General Plan policies would reduce the potential for such accidents to occur and minimize the potential for them to result in irreversible damage to the environment.

The proposed General Plan's impacts relating to hazards and hazardous materials and the effectiveness of proposed General Plan policies are analyzed further in **Section 5.9: Hazards, Hazardous Materials, and Wildfire**. As stated in **Section 5.9**, the proposed General Plan would not result in substantial hazards to the public due to the transport, use, and/or disposal of hazardous materials, following compliance with existing federal, State, regional, and local regulations, as well as proposed General Plan policies. Future development under the proposed General Plan would be designed to be consistent with the proposed General Plan, including the following proposed General Plan policies related to hazards, hazardous materials, and emergency response: Policy S-1.1 Hazard planning, which would require regular updates to the Local Hazard Mitigation Plan; Policy S-1.4 Utility hardening, which requires that utilities be designed to withstand seismic forces and fire; Policy S-3.2 Pipelines and electrical transmission lines, which prohibits the development of new hazardous waste facilities within major natural gas transmission, electrical transmission line, or hazardous liquid pipeline easements; Policy S-3.4, Hazardous material disposal, which calls for the City and local waste handlers to work together to ensure safe disposal of hazardous materials; Policy S-3.5 Hazardous materials transport, which encourages the safe transport of hazardous materials; Policy S-2.2 Emergency response, which would require the maintenance of a comprehensive Emergency Operations Plan to ensure quick and effective response to human-caused natural hazards; Policy OSC-4.4 Stormwater and urban runoff, which requires site design and operational procedures that reduce, treat, and capture stormwater and urban runoff in compliance with State and federal requirements; and Policy OSC-4.6 Military coordination on water supply and quality, which requires collaboration with the military to prevent groundwater contamination and stormwater runoff both from and onto military facilities. Additionally, future development under the proposed General Plan would be required to be consistent with the latest State building code and standards for seismic, landslide, fire, and flood safety (Policy S-1.3).

Additionally, future development under the proposed General Plan would be subject to the requirements of CEQA, and would therefore, unless found to be exempt from CEQA, be required to undergo site-specific CEQA analysis. Such site-specific CEQA review would include an analysis of a project's consistency with the proposed General Plan, potential to create a significant hazard to the environment through the routine transport, use, or disposal of hazardous materials, and potential to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Project-specific mitigation to avoid/lessen potential environmental accidents would be recommended, as needed and feasible. Therefore, while environmental accidents may occur as a result of future development under the proposed General Plan, compliance with applicable federal, State, and local regulations and proposed General Plan policies would reduce the potential for environmental accidents to occur and ensure proper emergency response to minimize damage. Therefore, irreversible damage from environmental accidents is not expected to result from adoption and implementation of the proposed General Plan.

Barstow International Gateway

Refer to **Section 5.9** and **Section 5.14**, which discuss reasonably foreseeable potential impacts of BIG during construction and operations, including environmental accidents such as wildfire or hazardous industrial accidents. BIG construction would not require transporting, storing, or disposing of HMW in quantities greater than needed to support construction activities, thereby minimizing potential exposure to the public, construction workers, and the environment. However, inadvertent releases or spills could occur from the improper storage of HMW, improper handling of HMW, accidents, seismic activity, or inclement weather and have the potential to result in direct and temporary effects; refer to **Section 5.9**. As discussed in that section of the EIR, BIG construction activities and operations would result in less than significant impacts with mitigation incorporated concerning the creation of a significant hazard to the public/ environment through reasonably foreseeable upset/accident conditions involving the release of hazardous materials into the environment. Additionally, BIG construction and operations would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires, and a less than significant impact would occur.

BIG construction activities would not require transporting, storing, or disposing of HMW in quantities greater than needed to support construction activities, thereby minimizing potential exposure of long-lasting HMW in the environment. During construction, off-site accidents during HMW transport to or from the construction site could expose individuals and the environment to risks at some distance from the construction site. Although transportation accidents are infrequent, accidents could occur during shipment of hazardous commodities (such as gasoline, diesel, or compressed gases) for construction. Accidents could also occur during cleanup of existing contaminated sites before the construction phase or during the transportation of HMW generated during construction. As discussed in **Section 5.9**, BNSF would prepare and implement a hazard communication program that would require labeling all containers and provide employees with access to material safety data sheets. HMW users could consult the material safety data sheet for the specific material they plan to work with and consider response options beforehand in case of a spill or release. BNSF would obtain demolition permits for removing structures within the footprint. Demolition permits include measures for the safe dismantling and removal of building components and debris, and prevents the accidental release of lead and asbestos, thereby protecting workers and the public from potential exposure to HMW during demolition. BIG would also comply with relevant environmental policy regarding the storage and disposal of hazardous materials. BIG would be subject to compliance with **MM BIG HAZ-1**, which includes provisions for responding to the disturbance of undocumented contamination. With mitigation incorporated and following compliance with federal, State, and regional regulations and laws, BIG construction is not expected to produce accident conditions that would pose an irreversible risk to the surrounding environment.

During BIG operations, no long-term HMW storage would occur but containers and railcars containing HMW would be handled at the rail yard. However, the potential for accident conditions during BIG operations, including those that could occur during train derailment, would be minimized through compliance with regulatory framework and existing BNSF policies. During BIG operations, an on-site or off-site accident, collision, or derailment involving trains may release HMW into the environment. For some chemicals, toxic fumes may be airborne and blown beyond the accident site. Fire and explosion are also a possibility. Although the State enforces standard accident and HMW recovery training and procedures, which are followed by private State-licensed, certified, and bonded transportation companies and contractors, BIG's location along interstate rail and highway corridors creates a risk of exposure. Pursuant to California Division of Occupational Safety and Health regulations (29 Code of Federal Regulation, Part 1910.120), standard accident training for cleaning up small spills would be provided to all individuals prior to their work with hazardous substances, and the appropriate types and amounts of spill cleanup materials and personal protective equipment would be immediately available. Additionally, BNSF has made steps to reduce the risk of derailment through: improving technologies, investment in new infrastructure, and ongoing employee training; provisions of specialized hazmat equipment (e.g., fire foam trailers, breathing kits, oil spill response trailers) and a system emergency response plan (the BNSF Response Plan); and establishing effective partnerships with local first responders to minimize the effects of a HMW spill; refer to **Section 5.14** and **Section 5.9** for more information.

Compliance with federal, State, and local regulations would ensure that the usage and storage of any hazardous materials and waste during BIG operations would occur in the safest and most efficient manner. Concerning hazardous substance transportation and emergency response during BIG operations, BIG would be required to adhere to rigorous federal and State regulations as well as BNSF's own emergency response plan. In consideration of these requirements, the U.S. EPA would set remediation requirements and oversee remediation efforts in the event of accidental release of HMW into the environment. Long-term monitoring, remediation, and eventual closure of an incident would be required to meet regulatory requirements and be approved by U.S. EPA and applicable State agencies. Similarly, BIG operations would comply with any federal, State, and local air quality and water quality regulations to further minimize the potential for accident conditions.

In consideration of the above, BIG would minimize the potential for any environmental impacts due to accidental discharges, including those that occur during a train derailment. Mitigation measures have been proposed to further prepare for potential discovery of hazardous materials on-site during construction in the form of a Soil Management Plan. With the addition of mitigation and compliance with federal, State, and regional regulations and laws, BIG is not expected to produce accidents that would pose an irreversible risk to the surrounding environment.

Would the Project result in irretrievable commitment of resources such that the consumption is not justified?

For the purposes of the analysis below, it is assumed that development under the Project (both the proposed General Plan and BIG) would involve commitment of resources including land resources; fossil fuels such as oil and natural gas; and materials used in construction, such as lumber and other forested products, minerals such as aggregates (e.g., sand, gravel, gravel, clay, limestone, gypsum, and crushed stone), metals (e.g., copper, aluminum, steel, etc.), and water.

"Irretrievable" refers to a commitment of resources that is difficult or impossible to reverse or recover. The ability of the aforementioned resources to be retrieved at the end of the Project's lifetime is limited to various factors, including the recyclability of a given resource, the economic viability of its retrieval, and the existing regulatory framework governing said resource. Common building materials, such as steel, aggregate, and pavement, can be diverted from disposal and managed into new productive uses. The Code of the City of Barstow (Barstow Code) implements the CALGreen Building Code, requiring an approved Construction Waste Management Plan and adherence to diversion targets (Barstow Code § 6.20.490). As such, future development under the proposed General Plan would be required to comply with regulations that require the responsible use and recycling of resources, such as the CALGreen Code and Barstow Code § 6.20.490.

Proposed General Plan

Development under the proposed General Plan would involve a large commitment of nonrenewable resources including land, agricultural resources, cultural resources, mineral resources, fossil fuels, and electric power supplied by non-renewable energy sources during construction of future development and fossil fuels and electric power (supplied by non-renewable energy sources during operations). As concluded above, buildout of the proposed General Plan would require the long-term commitment of nonrenewable resources, making the retrieval of these nonrenewable resources unlikely.

The construction of future development under the proposed General Plan would require the commitment of resources such as the following:

- **Land.** Development under the proposed General Plan would result in the construction of structures, facilities, and/or infrastructure on land that is currently undeveloped. Development of these lands would generally result in their future and permanent commitment to urban uses. The proposed Land Use Plan, under the proposed General Plan, represents strategic, long-range planning efforts that ensure cohesion between land uses and that a balanced mix of high-quality land uses exists within the proposed General Plan area (Policy LU-1.1 Land use compatibility and Policy LU-2.1 Balanced mix of land uses). The proposed Land Use Plan and impacts associated with land use and planning, are discussed further in **Section 5.11: Land Use and Planning**. As discussed in **Section 5.11**, implementation of the proposed General Plan and its proposed Land Use Plan would have less than significant effects concerning land use and planning. Therefore, the proposed General Plan would result in an irretrievable commitment of land to development/ improvements.

- **Fossil Fuels.** The commitment of fossil fuels under the proposed General Plan is described in greater detail above. Due to the nature of this resource, its retrieval upon consumption would be unlikely. The proposed General Plan would promote the efficient use of fossil fuels by complying with regulations and implementing the proposed General Plan policies related to land use and transportation planning and design, energy efficiency, public and active transit, and renewable energy generation that would contribute to minimizing building and transportation-related energy use. Therefore, the proposed General Plan would result in an irretrievable commitment of fossil fuels.
- **Electric Power.** The energy resource demands would be used for construction, heating and cooling of buildings, transportation of people and goods, lighting, and other associated energy needs. Energy consumption during construction is addressed in **Section 5.6: Energy**. Due to the nature of this resource, its retrieval upon consumption would be unlikely. The proposed General Plan would promote the efficient use of electric power by complying with regulations and implementing the proposed General Plan policies related to land use and transportation planning and design, energy efficiency, public and active transit, and renewable energy generation that would contribute to minimizing building and transportation-related energy use. Therefore, the proposed General Plan would result in an irretrievable commitment of energy sources used to generate electric power.
- **Water (e.g., Groundwater).** As outlined in **Section 5.16: Utilities and Service Systems**, the City's water supplier can meet the anticipated demand associated with the proposed General Plan. Additionally, **Section 5.10: Hydrology and Water Quality** indicates that the construction water demands of future development under the proposed General Plan would not significantly impact groundwater supplies such that groundwater resources would be irretrievably depleted.

The commitment of these resources during future development under the proposed General Plan is justified because, without their consumption, the proposed General Plan would not be able to achieve its objectives, including increasing jobs and housing; see **Section 3.0: Project Description**. Additionally, the commitment of these resources during construction is not unjustified because the resources are needed to implement the Land Use Plan that is intended to meet community needs such as housing, jobs, support services, and alternative transportation modes, along with their supporting infrastructure. Additionally, the General Plan policies have been developed to minimize/avoid environmental impacts. Pursuant to State CEQA Guidelines § 15093, a Statement of Overriding Considerations has been prepared to demonstrate that as required.

Additionally, operations associated with future development under the proposed General Plan would require the ongoing commitment of the following resources:

- **Fossil Fuels.** The commitment of fossil fuels under the proposed General Plan is described in greater detail above. Due to the nature of this resource, its retrieval upon consumption would be unlikely. The proposed General Plan would promote the efficient use of fossil fuels by complying with regulations and implementing the proposed General Plan policies related to land use and transportation planning and design, energy efficiency, public and active transit, and renewable energy generation that would contribute to minimizing building and transportation-related energy use. Therefore, the proposed General Plan would result in an irretrievable commitment of fossil fuels.
- **Electric Power.** Energy consumption during the operation of buildout under the proposed General Plan is addressed in **Section 5.6**. Due to the nature of this resource, its retrieval upon consumption would be unlikely. The proposed General Plan would promote the efficient use of electric power by complying with regulations and implementing the proposed General Plan policies related to land use and transportation planning and design, energy efficiency, public and active transit, and renewable energy generation that would contribute to minimizing building and transportation-related energy. Therefore, the proposed General Plan would result in an irretrievable commitment of energy sources used to generate electric power.
- **Water (e.g., Groundwater).** As outlined in **Section 5.16**, the City's water supplier can meet the anticipated demand associated with the proposed General Plan. Additionally**, Section 5.10** indicates that the operational water demands of future development under the proposed General Plan would not significantly impact groundwater supplies such that groundwater resources would be irretrievably depleted.

As discussed above, the proposed General Plan would result in an irretrievable commitment of various resources, however, development under the proposed General Plan would be planned and mitigated in a manner that would reduce or avoid, to the extent feasible, significant impacts to the environment. Therefore, the irreversible commitment of land to such development would not be wasteful and is considered justified.

Barstow International Gateway

As discussed in detail above, BIG would involve a large commitment of nonrenewable resources including land, agricultural resources, cultural resources, mineral resources, fossil fuels, metals, and electric power supplied by non-renewable energy sources during the construction phase and fossil fuels and electric power (supplied by non-renewable energy sources) during operations. As concluded above, BIG would require the long-term commitment of nonrenewable resources, making the retrieval of these nonrenewable resources unlikely.

BIG's construction would require the commitment of resources such as the following:

- **Land.** BIG's commitment of land is described in greater detail, above (see ***Would the Project result in irretrievable commitment of resources such that the consumption is not justified?***). This large commitment of land would be permanent and, given BIG's nature, the likelihood of returning the land to its original condition once it has been developed is low. The BIG Specific Plan is a component of the proposed General Plan and its proposed Land Use Plan, a strategic, long-range planning effort that would ensure cohesion between land uses and that a balanced mix of high-quality land uses exists within the proposed General Plan area. As discussed within **Section 3.0**, BIG would provide new employment-generating land uses on currently vacant land that would substantially add to the number of livable wage jobs, strengthen the City's economic base and fiscal resiliency, and provide career pathways for the community to provide well-paying jobs for residents within the City. As discussed in **Section 5.11**, implementation of BIG, including the adoption of the BIG Specific Plan, would have less than significant effects concerning land use and planning. Therefore, development of BIG would not result in an irretrievable commitment of land that is not justified.

- **Fossil Fuels.** The commitment of fossil fuels used in BIG's construction is described in greater detail above. Due to the nature of this resource, its retrieval upon consumption would be unlikely. However, BIG would promote the efficient use of fossil fuels during construction, in addition to compliance with the regulatory requirements discussed in **Section 5.6**. Therefore, while BIG would result in an irretrievable commitment of fossil fuels, BIG's consumption of these resources during construction would not be considered wasteful.
- **Lumber.** BIG construction activities would require the consumption of lumber and other forested products during construction. BIG would comply with CALGreen and the Barstow Code regarding the diversion of construction and demolition waste from landfills. Because lumber and other forested products used in construction are generally recyclable and subject to State and local recycling standards, BIG's use of necessary building materials (e.g., lumber) would not constitute an irretrievable commitment of resources.
- **Electric Power.** The energy consumed during BIG construction is discussed in **Section 5.6**. Due to the projected energy consumption of gasoline fuel and diesel fuel, BIG's potential energy consumption would conservatively result in potentially wasteful, inefficient, or unnecessary consumption of energy resources (i.e., electricity, diesel fuel, and gasoline fuel) during construction. Additionally, due to the nature of this resource, its retrieval upon consumption would be unlikely.

  However, BIG's scale and potential volume of fuel consumed makes it difficult to predict whether energy consumption during BIG construction would remain consistent at all times. Therefore, the scale and potential volume of fuel consumed during BIG's construction would be difficult to estimate. However, BIG's energy consumption would not be wasteful, inefficient, or unnecessary. BIG would promote the efficient use of electric power during construction, in addition to compliance with the regulatory requirements discussed in **Section 5.6**. Ultimately, the Project was determined to have a less than significant impact related to the wasteful, inefficient, or unnecessary consumption of energy resources, particularly relating to fuel consumption, during construction. Therefore, while BIG would result in an irretrievable commitment of electric power, BIG's consumption of these resources during construction would not be considered wasteful.
- **Mineral Resources.** The commitment of mineral resources used in construction of BIG is described in greater detail above. BIG construction activities would require the consumption of mineral

resources such as aggregates (e.g., sand, gravel, and other bulk materials). BIG would comply with CALGreen and the Barstow Code regarding the diversion of construction and demolition waste from landfills. Because mineral resources used in construction are generally recyclable and subject to State and local recycling standards, BIG's use of necessary building materials (e.g., mineral resources such as aggregate) would not constitute an irretrievable commitment of resources.

- **Metals.** The commitment of metals used in construction of BIG is described in greater detail above. Because metals used in construction are generally recyclable and subject to State and local recycling standards, BIG's use of necessary building materials (e.g., metals such as steel) would not constitute an irretrievable commitment of resources.
- **Water (e.g., Groundwater).** Considering groundwater resources, GSWC, the water supplier for the City and BIG is able to meet BIG's anticipated demand; see **Section 5.17**. Also, as concluded in **Section 5.10**, BIG's construction water demands would not substantially impact groundwater supplies such that groundwater resources would be irretrievably depleted.

Additionally, BIG operations would require the ongoing commitment of the following resources:

- **Fossil Fuels.** The commitment of fossil fuels during BIG operations is described in greater detail above. BIG's use of fossil fuels (e.g., for heavy-duty truck hauling trips, worker commute vehicle trips, etc.) would be ongoing through BIG's operational lifetime. Due to the nature of this resource, its retrieval upon consumption would be unlikely. However, BIG operations minimizes the usage of fossil fuels through on-site solar generation, in addition to compliance with the regulatory requirements discussed in **Section 5.6**. Additionally, containers drayed between BIG's intermodal facility and transload warehouse center would be drayed via electric hostlers, avoiding any fossil fuel usage. Therefore, while BIG would result in an irretrievable commitment of fossil fuels, BIG's consumption of these resources during operations would not be considered wasteful.

  Electric Power. The commitment of electric power used during BIG operations is described in greater detail above and in **Section 5.6**. Due to BIG's projected consumption of gasoline fuel and diesel fuel during operations, BIG's potential operational energy consumption would conservatively result in potentially wasteful, inefficient, or unnecessary consumption of energy resources (i.e., electricity, diesel fuel, and gasoline fuel). Additionally, due to the nature of this resource, its retrieval upon consumption would be unlikely.

  However, BIG's scale and potential volume of fuel consumed makes it difficult to predict whether energy consumption during BIG operations would remain consistent at all times. Therefore, the scale and potential volume of fuel consumed during BIG's operation would be difficult to estimate. However, BIG's energy consumption would not be wasteful, inefficient, or unnecessary. BIG would promote the efficient use of electric power through the development of a photovoltaic solar farm, in addition to compliance with the regulatory requirements discussed in **Section 5.6**. BIG proposes a 21 megawatt (MW) photovoltaic solar farm within the BIG Specific Plan, thereby reducing BIG's energy consumption. Ultimately, BIG was determined to have a less than significant impact related to the wasteful, inefficient, or unnecessary consumption of energy resources, particularly relating to fuel consumption, during long-term operations. Therefore, while BIG would result in an irretrievable commitment of electric power, BIG's consumption of these resources during operations would not be considered wasteful.

- **Water (e.g., Groundwater).** Considering groundwater resources, GSWC, the water supplier for the City and BIG, is able to meet BIG's anticipated demand; see **Section 5.17**. Also, as concluded in Section 5.10, BIG's operational water demands would not substantially impact groundwater supplies such that groundwater resources would be irretrievably depleted.

Therefore, BIG would result in an irretrievable commitment of various resources, as discussed above, however, development of BIG would be mitigated in a manner that would reduce or avoid, to the extent feasible, significant impacts to the environment. Therefore, the irreversible commitment of land to such development would not be wasteful and is considered justified.

7.3 GROWTH-INDUCING IMPACTS

State CEQA Guidelines § 15126.2(e) requires that EIRs discuss the ways in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (e.g., a major expansion of a wastewater treatment plant might allow for more construction in service areas). For purposes of this analysis, "surrounding environment" refers to surrounding area, which includes both the City and its unincorporated SOI. New employees from commercial or industrial development and new population from residential development represent direct forms of growth. These direct forms of growth have a secondary effect of expanding the size of local markets and inducing additional economic activity in the area. Also required is an assessment of other projects that would foster other activities which could affect the environment, individually or cumulatively. The Project would therefore have a growth-inducing impact if it would:

- Directly or indirectly foster economic or population growth, or the construction of additional housing in the area;
- Remove obstacles to population growth;
- Increase population that could tax existing community service facilities, requiring the construction of new or expanded facilities that could cause significant environmental effects; or
- Encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.

A project's potential to induce growth does not automatically result in growth. Under CEQA, the potential for growth inducement is not considered necessarily detrimental nor necessarily beneficial, and neither is it automatically considered to be of little significance to the environment. CEQA does not require an analysis of whether the growth-inducing impact would be significant under CEQA or consideration of mitigation measures to address growth-inducing impacts. Therefore, an EIR is not required to provide a detailed analysis of a project's effects on growth, and a general analysis is sufficient. This issue is presented to provide additional information on ways in which the Project could contribute to changes in the environment, beyond the direct consequences of implementing the Project examined in the preceding sections of this EIR. However, it is noted that CEQA does require analysis of whether a project induces substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure). This impact analysis is provided in **Section 5.13: Population and Housing**.

Would the Project directly or indirectly foster economic growth in the surrounding area?

For this analysis, the Project would directly foster economic growth if it proposed new homes and/or businesses and would indirectly foster economic growth if it proposed extension of roads or other structures. The following analyses address the potential for Project construction and operations to foster economic growth directly or indirectly.

Proposed General Plan

The proposed General Plan is strictly a policy document that does not provide entitlements to any specific development projects, except for BIG, that would directly foster economic growth. However, the proposed General Plan includes a Land Use Plan that would allow for the development of new, employment-generating land uses. Compared to the City's 2015 Land Use Plan, the proposed Land Use Plan expands the existing Industrial land use designation west of Lenwood Road to account for the proposed BIG Specific Plan. Additionally, the proposed Land Use Plan would introduce a new Business Park (BP) land use designation intended to support commerce and industry, and to provide well-paying jobs for residents within the City. As shown in **Table 5.13-19: Comparison of 2015 General Plan and Proposed General Plan Projections**, the proposed General Plan is forecast to increase the City's jobs by approximately 75 percent and 27 percent when compared to existing and 2015 General Plan employment, respectively. Therefore, the proposed General Plan has the potential to indirectly foster economic growth by allowing employment-generating land uses via BIG and other potential development in the City. Although the Citywide Wastewater and Sewage Capacity Analysis (Carollo Analysis) evaluates the wastewater collection system needs for the 2048 planning horizon, the report does not result in new development potential (Carollo, 2025). The analysis confirmed that the proposed General Plan wastewater volumes can be treated at the existing wastewater treatment facility with onsite upgrades and replacements. Targeted improvements to the collections system would be needed as noted in the Carollo Analysis. All development potential is based on the land use element of the proposed General Plan and evaluated in this Draft EIR.

Barstow International Gateway (BIG)

BIG would directly and indirectly foster economic growth. An Economic and Fiscal Impact Analysis (Economic Analysis) was conducted for BIG (AECOM, 2025) and is provided as **Appendix 5.11-1: Economic Impact Report**. The Economic Analysis included an assessment of local industrial real estate markets, land use trends, and employment growth, and identified BIG's construction period and operational direct economic impacts. Additionally, the Economic Analysis identifies BIG's impacts at the State, County and City levels.

Construction Period. BIG's construction-period job creation is estimated to total 8,188 direct construction jobs (see **Table 3-12: Estimated Employment – BIG**), including construction workers, vendors, administrative staff, and inspectors. BIG's indirect and induced jobs in other industries (service, convenience, hospitality, and other supporting industries) are estimated to total 5,802 jobs and 11,891 jobs, respectively. In total, BIG construction-period job creation (direct, indirect, and induced) is estimated to total 25,881 jobs. The construction period is estimated to generate $126 million in State income and sales tax revenues over the assumed three-year construction period from 2026 to 2028 (AECOM, 2025). Therefore, BIG's construction-period jobs would directly and indirectly foster economic growth.

Operations. BIG operations are estimated to generate approximately 3,627 direct jobs by 2028 and approximately 5,373 direct jobs by 2048. Indirect and induced jobs generated in other industries are estimated to total 7,650 jobs and 8,920 jobs, respectively, by 2048. The County's and City's unemployment rates as of 2023 were approximately 10.3 percent (1,005 persons) and 7.1 percent (73,593 persons), respectively. Based on AECOM's analysis, state-level operating period impacts (annual direct, indirect, and induced) for BIG comprise an estimated 15,673 total jobs. Based on AECOM's analysis, County-level operating period impacts (direct, indirect, and induced) for BIG comprise an estimated 11,043 total jobs. Additionally, City-level operating period impacts (annual direct, indirect, and induced) for BIG comprise an estimated 5,973 total jobs. Therefore, BIG would result in new permanent employment opportunities and stimulate economic activity at State, County and City levels.

Due to this economic growth, BIG would indirectly foster economic growth associated with the development of other support uses (e.g., commercial, retail, office, etc.) in the surrounding area. Concerning logistics warehouse development (and related trucking activity) in the area surrounding the BIG Specific Plan area, the proposed General Plan's Business Park (BP) designation would not allow logistics warehouses and the proposed General Plan's General Industrial (GI) designation south of Main Street would allow warehouses. However, as described in **Section 3.0**, the on-site "closed loop" operation involves a system of private roads that would transport containers through the BIG Specific Plan area; refer to **Figure 3-19: Closed Loop System Design**. **Section 3.0** further describes the anticipated distribution (origin/destination) of intermodal containers and shows that every container is fully allocated for within BIG's capacity; refer to **Table 3-13: BIG IMF and Block Swap Estimated Annual Container Volumes**. With this system, all of BIG's intermodal facility capacity would be accommodated by the transload warehouse center. Therefore, given the "closed loop" nature of BIG operations between the intermodal facility and on-site transload warehouse center, BIG is not anticipated to foster warehousing development growth in the surrounding area, as it is already fully supported within this closed-loop system. However, BIG is expected to foster substantial economic growth directly and indirectly.

Therefore, BIG would directly and indirectly foster economic growth through operational direct job creation, and indirect and induced jobs related to supporting uses. However, BIG would not induce demand for surrounding warehouses to develop to support BIG, nor would the proposed General Plan's Business Park (BP) designation allow for warehouses in these surrounding areas, as it is already fully supported.

Would the Project directly or indirectly foster population growth in the surrounding area?

For this analysis, the Project would directly foster population growth if it proposed new homes and/or businesses and would indirectly foster population growth if it proposed extension of roads or other structures. The following analyses address the potential for Project construction and operations to directly or indirectly foster population growth.

Proposed General Plan

The proposed General Plan is strictly a policy document that, except for BIG, does not provide entitlements to any specific development projects or directly foster the construction of new homes/businesses. Therefore, the proposed General Plan would not directly foster population growth in the surrounding area. However, the proposed General Plan would support direct population growth through the proposed Land Use Plan that would accommodate new homes and businesses, including BIG.

While the proposed General Plan does not approve the construction of new housing or businesses (except BIG), the proposed Land Use Plan would allow for future development of additional housing and additional employment-generating land uses, which would provide opportunities for population growth. **Table 3-5: Proposed General Plan – 2048 Projections** in **Section 3.0: Project Description** shows that the proposed General Plan allows for 6,326 additional households, 18,531 additional residents, 15,341,198 additional square feet of non-residential development, and 10,819 jobs by 2048 as compared to the existing 2015 General Plan. Additionally, the proposed General Plan is forecast to allow a total housing stock of 19,738 dwelling units within the City and its unincorporated SOI by 2048. Therefore, the proposed General Plan indirectly foster population growth through its proposed Land Use Plan. It is important to note that Barstow's growth rate has been relatively low for decades (see **Table 5.13-6: Population and Household Size Trends – County of San Bernardino**), and no increase in the population growth rate was projected until BIG was proposed. BIG would generate additional employees, some of whom may live in the City, while others would move to the City. Much of the proposed General Plan is intended to ensure that there is adequate housing for BIG's operation-period employees (5,373 additional jobs by 2048).

Additionally, as mentioned in **Section 5.13: Population and Housing**, the proposed General Plan would support population and job growth indirectly through the proposed Land Use Plan that would facilitate construction of new businesses. As shown in **Table 5.13-19**, when accounting for BIG, the proposed General Plan is forecast to increase the City's jobs by approximately 75 percent and 27 percent when compared to existing and 2015 General Plan employment, respectively. It is anticipated that some portion of these new jobs would be filled by future employees who would relocate to the City. Thus, the proposed General Plan, inclusive of BIG, has the potential to indirectly foster population growth through its proposed Land Use Plan, which would facilitate the establishment of new businesses that would create new employment opportunities.

As concluded in **Section 5.13**, the proposed General Plan would indirectly support population growth of up to 53 percent and 16 percent when compared to existing conditions and 2015 General Plan forecast conditions, respectively, in Barstow and its unincorporated SOI by allowing new homes and businesses. Therefore, the proposed General Plan would indirectly foster population growth.

Barstow International Gateway (BIG)

Housing Development

BIG does not propose housing development, thus, would not directly foster population growth through the construction of new housing.

Business Development

BIG proposes to construct and operate a rail yard and transload warehouse center, as well as off-site rail and non-rail improvements; see **Section 3.0: Project Description**. BIG's construction-period job creation is estimated to total 8,188 direct construction jobs; see **Table 3-12: Estimated Employment – BIG**. When considering the indirect and induced job categories, BIG would generate approximately 17,693 additional jobs during construction. Therefore, BIG proposes construction of businesses, which have the potential to directly foster population growth. However, given the temporary nature of these construction jobs, and since it is typical for construction workers to be employed at multiple projects within any given year, it is unlikely that the workers filling the 8,188 direct construction jobs would choose to relocate to the City. Further, the County has an existing unemployment rate of 7.1 percent (approximately 74,017 persons) and the City has an existing unemployment rate of 10.3 percent (approximately 1,005 persons). Therefore, it is anticipated that BIG's direct construction jobs could be filled in part by unemployed persons who already reside in the BIG study area. Finally, construction activities would occur over approximately 34 months. Up to 50 construction workers at the start of construction and up to 150 construction workers at peak of construction are anticipated to remain in the City.[1] These construction workers would only be on-site for their relevant phases of construction (i.e., earthwork construction workers would primarily only be on-site for the grading and site preparation phases [14 months], building trade workers would only be on-site to construct buildings [12 months], etc.). As such, construction workers would typically be on the site for approximately one year. Given the relatively short time construction workers would be on the construction sites, it is highly unlikely they would permanently relocate to the BIG study area for temporary construction jobs; see **Section 5.13**. Therefore, BIG construction would not directly foster population growth in the BIG study area.

BIG operations would generate approximately 5,373 direct jobs within the City by 2048; see **Table 3-12** of the **Project Description**. The proposed solar farm would not generate additional permanent employees. When considering the additional 10,300 indirect and induced jobs, BIG operations would generate approximately 15,673 additional jobs by 2048; see **Table 3-12**. It is anticipated that BIG's operational jobs could be filled in part by underemployed or unemployed persons who already reside in the study area, based on the following factors: the City has a current unemployment rate of approximately 10.3 percent (1,005 persons), the County has a current unemployment rate of approximately 7.1 percent (74,017 persons); and BNSF currently collaborates with Barstow Community College to provide a contract education program to provide welding instruction for college students (Barstow Community College, 2024). Thus, it is anticipated that a sizeable portion of the direct jobs attributable to BIG operations could

---

1 Ken Taylor, personal communication, September 18, 2025.

be filled by the underemployed persons and the approximately 1,005 unemployed persons who already reside in the City.

While population effects due to business development/increased employment would occur within the BIG study area, the City and County would experience population changes differently. Population changes within the City may include relocations from future employees who presently reside in the County portion of the BIG study area. Estimating the precise number of BIG's direct 5,373 employees who would relocate to the City would be highly speculative, since many factors influence personal housing location decisions. In its projections, the City assumed that approximately 35 percent of additional workers employed in Barstow would also choose to live in the City; see **Appendix 5.13 GP-1** for more detail). The following analysis applies the same assumption to estimate the number of City households that would be generated by BIG's operational employment, with the remaining jobs being filled by persons who would reside outside the proposed General Plan area. If 35 percent of BIG's 5,373 operational jobs would result in a new household, approximately 1,881 new households would be directly related to BIG's operational jobs. Assuming 3.0 persons per household (see **Appendix 5.13 GP-1**), BIG operations could potentially add approximately 5,643 persons to the City's population, which would represent a 16 percent increase (to 39,945 persons) over the existing population of 34,302 persons.

As previously noted, the remaining housing demand associated with BIG's operational jobs could also be accommodated in part by available housing units in the County portion of the BIG study area. For example, the surrounding cities have vacancy rates of four percent or more (approximately 3,260 dwelling units),[2] indicating there is available housing where BIG's operational employees could relocate.

Therefore, BIG would directly foster population growth in the BIG study area through business development in the manner described above. However, BIG is a component of the overall Project, which also includes the proposed General Plan. The potential population attributable to BIG is already accounted for in the City's population growth assumptions; see **Appendix 5.13 GP-1** for more detail. Additionally, as shown in **Table 5.13-3**, the proposed General Plan evaluated a 2048 population of 52,833 persons, which includes BIG.

Infrastructure Improvements

BIG development would involve: infrastructure improvements (such as internal circulation systems, freight rail tracks, and a solar farm); various improvements and modifications proposed to Main Street for access to the rail yard and to Lenwood Road for access to the transload warehouse center; a new grade-separated crossing from Lenwood Road to the transload warehouse center to keep truck and employee traffic separated from local roadways and communities; and new utility extensions and improvements (such as new or expanded water, wastewater, electric power, and telecommunications facilities), as discussed in **Section 5.17**. These transportation improvements are either internal and would serve BIG or do not involve roadway extensions into undeveloped areas. Furthermore, the solar farm is sized to serve the power needs of BIG. Therefore, BIG would not indirectly foster population growth in the BIG study

2 City of Hesperia, 4.0 percent vacancy rate (1,253 dwelling unit) and City of Victorville, 4.9 percent vacancy rate (2,007 dwelling unit); according to the Department of Finance Table E-5 Population and Housing Estimates for Cities, Counties, and the State, January 2021-2024; refer to **Section 5.13**.

area through extension of infrastructure. Additionally, the utility extensions are not anticipated to indirectly foster population growth in the utility "expansion" area (i.e., areas south and west of the BIG footprint), since the improvement of the BIG footprint is a component of the overall Project, which also includes the proposed General Plan, and therefore indirect population growth through infrastructure that would be attributable to BIG is accounted for within the City's proposed General Plan growth analysis; see above. Additionally, the utility extensions are intended to only serve BIG. Therefore, BIG is not anticipated to indirectly foster population growth in the area surrounding the BIG footprint through extension of roads or other infrastructure.

Conclusion. Overall, BIG construction-period employment would not directly foster population growth through construction of new housing. However, BIG's operational employment would directly foster population growth in the BIG study area through business development in the manner described above. Lastly, BIG would not indirectly foster population growth in the BIG study area through extension of infrastructure, due to the limitation of infrastructure improvements to only serve BIG.

Would the Project directly or indirectly foster the construction of additional housing?

Proposed General Plan

The proposed General Plan is strictly a policy document that does not provide entitlements to any specific development projects or directly foster the construction of additional housing. That is, the proposed General Plan does not approve the construction of new housing or businesses (except BIG) that would directly foster the construction of additional housing.

Additionally, as discussed above, the proposed General Plan would indirectly foster population and job growth through the proposed Land Use Plan that would allow construction of new businesses. As shown in **Table 5.13-19**, the proposed General Plan would support an increase in the City's jobs by approximately 75 percent and 27 percent when compared to existing and 2015 General Plan employment, respectively. It is anticipated that some portion of these new jobs would be filled by future employees who would relocate to the City for BIG. Thus, through the inclusion of BIG, the proposed General Plan has the potential to indirectly induce demand for housing through its proposed Land Use Plan, which would facilitate the establishment of new businesses that would create new employment opportunities. Therefore, the Land Use Plan under the proposed General Plan would both allow for the construction of additional housing and support the demand for housing through economic growth, i.e., the development of new, employment-generating land uses. **Table 3.5: Proposed General Plan – 2048 Projections**, in **Section 3.0: Project Description**, shows that the proposed General Plan anticipates 6,608 additional dwelling units by 2048 as compared to the 2015 General Plan. Therefore, the proposed General Plan would indirectly foster the construction of additional housing with the City.

Barstow International Gateway (BIG)

Since BIG does not propose housing, BIG would not directly foster the construction of additional housing. As discussed above, it is anticipated that BIG's operational jobs could be filled in part by underemployed or unemployed persons who already reside in the City. However, BIG's operational jobs could be filled in part by people who would choose to relocate to the City. Estimating the precise number of future BIG's operational employees who would relocate to the City would be highly speculative, since many factors influence personal housing location decisions. As discussed above, the employment associated with BIG operations could potentially generate 1,881 new households in the City. The City has an estimated 9,614 housing units with a 2023 vacancy rate of 8.8 percent (835 housing units) and the County as a whole (including incorporated areas) has an estimated 746,006 housing units with a vacancy rate of 8.8 percent (59,680 housing units); refer to **Table 5.13-12: Existing Housing and Households – County of San Bernardino and City of Barstow**. As a result, the housing demand generated by the direct increase in employment could be met in part through existing vacant units and the proposed General Plan's anticipated 6,679 additional units. Therefore, BIG would indirectly foster the construction of additional housing in the City. Further, it is worth noting that the Regional Housing Needs Assessment (RHNA) and the statewide housing crisis have created an expectation that population projections for the region, and for the City, would need to change. While it is possible that some of the future employees would already reside in Barstow, it is unlikely that all of them would be existing residents. The Project (proposed General Plan and BIG) is designed to ensure that the City can accommodate the potential growth as described in this EIR. BIG is an incorporated component of the overall Project, which also includes the proposed General Plan. Therefore, while BIG has the potential to indirectly foster the construction of additional housing, any housing attributable to BIG is accounted for within the City's proposed General Plan growth analysis since BIG is part of the proposed General Plan.

Would the Project remove obstacles to population growth?

Pursuant to State CEQA Guidelines § 15126.2(d), a project may remove obstacles to population growth through the construction or extension of major infrastructure facilities. Additionally, increases in population may further tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects.

Proposed General Plan

Approval and implementation of the proposed General Plan would provide the regulatory framework, and the EIR would provide the environmental analysis that would enable the annexation of approximately 2,785 acres for BIG and allow other future development consistent with the proposed General Plan and within the scope of this EIR to take advantage of exemptions and tiering pursuant to CEQA.

Although portions of the City and its unincorporated SOI are currently served by infrastructure, implementation of the proposed General Plan would allow for the development of existing undeveloped land and the intensification of existing land uses. This includes the provision of roadway improvements like sidewalks, streetlights, water, power, sewer lines, etc.

Implementation of the proposed General Plan would require the construction/modification of roadways, public service facilities (i.e., fire and police protection facilities, school facilities, and library space), and utilities and service systems (i.e., stormwater, water, sewer, and energy/communications) toward undeveloped areas of the City and its unincorporated SOI. In addition, the proposed General Plan would increase demand for electricity and natural gas that could require expansion of energy infrastructure, as provided by Southern California Edison and the Southern California Gas Company. As infrastructure is extended throughout the City and its unincorporated SOI, obstacles to growth would be removed. As discussed below, BIG's proposed construction and extension of major infrastructure facilities are intended to solely support BIG. As such, BIG-related improvements are not anticipated to represent removal of an obstacle to future growth. The Project's impacts concerning utilities and service systems and potential needs for future improvements are discussed in **Section 5.17**. The expansion of infrastructure is linked directly to the increase in demand and, in most instances, funded through development impact fees paid at the building permit stage of development and other conditions of approval and development agreement requirements. As such, infrastructure improvements often lag behind the demand as there can be delays between payment of impact fees and construction of the improvement. However, as the infrastructure is expanded it would be designed to accommodate the growth anticipated in the proposed General Plan and evaluated in this EIR. Preparation of the General Plan is the first step in developing infrastructure master plans that would rely upon the proposed General Plan's population and employment growth projections. Therefore, adoption of the proposed General Plan would remove obstacles to growth in the community.

As noted in the draft Citywide Wastewater and Sewage Capacity Analysis (Carollo Analysis), the wastewater treatment facility (WWTF) would need to be upgraded to meet the projected growth through 2048. (Carollo, 2025). As discussed in the Carollo analysis, upgrade options are either onsite modifications to the existing plant for growth through 2048, or replacement of the existing plant with a new WWTF for growth beyond 2048 to buildout. This environmental analysis does not consider impacts associated with buildout as the timing is beyond 2048 and speculative. Wastewater upgrades and modifications through 2048 would be dependent on the timing, intensity, and location of future development and the City would fund these improvements through the collection of development impact fees (DIFs). Because these improvements would be directly related to development size and location (not "overbuilding"), they would not remove obstacles for population growth.

Barstow International Gateway (BIG)

The BIG Specific Plan area is mostly vacant with little to no improvements, and sparse rural residential uses, except for the commercial and industrial uses north of Main Street on the eastern portion of this area. Upon Project implementation, new utility and transportation infrastructure would be required within the BIG footprint to support BIG. BIG would generate water demand, wastewater, electric power demand, and telecommunications services, as well as traverse existing natural gas facilities, which may require or result in the relocation, removal, or construction of new facilities. The facilities proposed to accommodate operations are described in **Section 3.0** and summarized in **Section 5.17**. Therefore, BIG operations would require construction of new or expanded water, wastewater, electric power, and telecommunications facilities.

BIG would not remove obstacles to growth through the construction or extension of major infrastructure facilities intended to support BIG. The off-site water, wastewater, electric power, and telecommunications are intended to only serve BIG and are not anticipated to represent removal of an obstacle to other future development and, as such, is not considered a growth-inducing impact. The environmental impacts associated with the facility improvements associated with BIG have been analyzed in **Section 5.1** through **Section 5.17**. In consideration of potentially significant impacts which were not minimized by the BIG-project design features (e.g., BIG Specific Plan design standards), mitigation measures have been identified which, when implemented, would reduce potential impacts to less than significant levels (except for those topics discussed in **Section 7.1**, which would remain significant and unavoidable). BIG would necessitate the provision of new or improved utility facilities. However, utilities would be sized to serve BIG. As discussed in **Section 5.17**, adequate capacity to serve BIG was concluded for each of those facilities. Therefore, the Project would not remove obstacles to growth through the improvement of major infrastructure and utility facilities that would allow for further population growth.

Would the Project require the construction of new or expanded facilities that could cause significant environmental effects?

Proposed General Plan

Buildout and development under the proposed General Plan would require additional fire and police protection facilities and services, sewer improvements, school facilities, and library space to maintain desired levels of service. This would include expanding existing facilities; acquiring land to construct new stations, schools, and libraries; and adequately equipping and staffing new facilities. **Section 5.14** analyzes the proposed General Plan's impacts concerning public services in more detail. At a programmatic level of analysis, it is speculative and infeasible to evaluate project-specific environmental impacts with the specific construction of future recreational facilities since specific sites and timeframes for development are unknown. When specific projects are necessitated and subsequently undertaken to meet the growth demands from buildout of the proposed General Plan, the appropriate level of analysis required under CEQA would be conducted by the City. Therefore, as stated in **Section 5.14**, impacts would be less than significant. City policies and existing ordinances ensure that public facilities needed to serve the immediate needs of a development are both analyzed and included in the development approval. For those public service facilities that are needed to serve larger areas of the community, like a fire or police station, etc., projects are required to pay their fair share through impact fees.

Barstow International Gateway (BIG)

As discussed in **Section 5.17**, BIG would require expanded public services and utilities, the majority of which would be located on-site. The permanent facilities proposed to accommodate BIG operations are described in detail in **Section 3.0**. Required public services and anticipated utility providers for BIG are described in **Section 5.14** and **Section 5.17**, respectively.

BIG's physical, environmental effects as a result of new or expanded public services facilities are analyzed in **Section 5.14**. As described in **Section 5.14**, 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. BIG would not result in substantial adverse physical impacts associated with the provision of, or need for, new or physically altered fire protection facilities. A less than significant impact would occur in this regard.

BIG would require the construction of new on-site electric power facilities, including: three substations, new 33 kV transmission lines, an approximately 140-acre solar farm, and emergency diesel generators at various locations across the rail yard and transload warehouse center. BIG would require the construction of an off-site, 33 kV transmission line that would result in significant environmental effects. Specifically, as mentioned in **Section 5.12: Noise**, BIG would result in significant and unavoidable impacts concerning noise during the construction of the 33 kV transmission line.

Because of the relatively undeveloped nature of the BIG footprint, BIG would require the construction of new stormwater infrastructure within the BIG footprint, including underground conveyance, storm drains, on-site surface detention basins, channel improvements to the Lenwood Channel, and other constructed surface reaches. As discussed in **Section 5.17**, with adherence to all, standard conditions, laws, rules, regulations, ordinances, and mitigation measures identified within this EIR, construction and operation of new stormwater infrastructure, required for the implementation of BIG, would result in less than significant environmental effects.

Additionally, BIG would require the construction of new, permanent water and sewer facilities. Relocation of existing/construction of new permanent water facilities to meet operational demands would be limited to on-site water distribution and minor off-site work associated with connections to the public main, as described further in **Section 5.17**. Wastewater generated by BIG operations would require relocation or construction of new or expanded sewer facilities, which would connect to the City's sewer infrastructure. As discussed in **Section 5.17**, with adherence to all, standard conditions, laws, rules, regulations, ordinances, and mitigation measures identified within this EIR, construction and operation of new water and wastewater facilities and infrastructure, required for the implementation of BIG, would result in less than significant environmental effects.

Additionally, **Section 5.15: Transportation** describes various off-site road improvements, including traffic signal installation, road restriping, and turn-lane additions, would not result in significant environmental impacts. Other than these impacts from off-site improvements, BIG is not anticipated to require new or expanded off-site facilities that would result in significant environmental impacts. The construction of new facilities is to serve BIG and the environmental impacts of those facilities are addressed in each impact analysis in this EIR. Therefore, these facilities would also not lead to indirect impacts outside of those caused by BIG.

Would the Project encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively?

Proposed General Plan

The proposed General Plan is a comprehensive update to the City of Barstow's adopted 2015 General Plan. By establishing goals and policies that guide and oversee the development process, the proposed General Plan strengthens the role of the City in approving new development. Nothing in the proposed General Plan reduces the oversight and approval process, although future development under the proposed General Plan and within the scope of this EIR may be streamlined to allow for more efficient analysis and review (e.g., the preparation of subsequent/supplemental environmental documents, addenda, etc.). Rather, the proposed General Plan includes goals and policies, and directs changes in land uses in the City, consistent with the expected growth from future development, including BIG. New and/or modified goals and policies in the proposed General Plan either replace, supplement or elaborate on those in the 2015 General Plan. Additionally, the proposed General Plan includes a Land Use Plan that would allow for the development of residential, commercial, and industrial uses. Compared to the City's 2015Land Use Plan, the proposed Land Use Plan expands the existing Industrial land use designation west of Lenwood Road to accommodate the BIG Specific Plan. Additionally, the proposed Land Use Plan would introduce a new Business Park (BP) land use designation intended to support commerce and industry, and to provide well-paying jobs for residents within the City.

Even though buildout under the proposed General Plan projected to be higher than existing conditions (2023), the inclusion of policies that guide development within the planning horizon would help manage potential environmental impacts. The proposed General Plan Land Use Plan (**Figure 3-13**), and the supporting policies in the proposed General Plan, are intended to ensure that new environmental impacts are minimized by placing developments with similar sensitivities near one another. While future development proposals may arise that would require rezones or redesignations that could locate incompatible land uses near one another, these actions would require a full environmental analysis of the impacts of such actions. Policies in the proposed General Plan would guide deliberation of any development requests. As shown in **Table 3-4**: **Existing Land Use Designations**, the proposed General Plan would result in land use changes; however, future development under the proposed General Plan would comply with all applicable local plans, policies, and ordinances, as discussed in **Section 5.11,** to ensure that there are no conflicts with adopted land development regulations and that any environmental impacts are minimized. Additionally, future development under the proposed General Plan would be required to undergo site-specific CEQA analysis, including an analysis of a project's consistency with the proposed General Plan. As discussed below, BIG has undergone site-specific environmental review and the BIG Specific Plan would establish zoning regulations and development standards for the Specific Plan area that are unique to the needs of BIG. As a rail project, the regulations/standards and needs are substantially different than the rest of the City. BIG's impacts on the environment are discussed throughout this EIR. Any future changes, whether to the proposed General Plan or to BIG, would be evaluated pursuant to CEQA to determine whether they are within the scope of this EIR or complete an independent entitlement and environmental review process, as applicable.

A general plan typically encourages or facilitates various activities, such as economic development and land use changes. As the population grows and occupies new dwelling units in accordance with the proposed General Plan, new residents would seek shopping, entertainment, employment, home improvement, auto maintenance, and other economic opportunities in the surrounding area. This would facilitate other activities such as the consumption of economic goods and services and would, therefore, encourage the creation of new businesses and/or expansion of existing businesses to address these economic needs. Furthermore, the proposed General Plan increases the development capacity for office, commercial, and retail uses, which would serve the shopping needs of the future residents and would generate employment opportunities. Also, BIG operations would generate direct jobs, as well as indirect/induced jobs in the City, as discussed below. Therefore, the proposed General Plan would encourage and facilitate other activities that could significantly affect the environment.

Physical environmental impacts of the proposed General Plan are discussed in **Section 5.1** through **Section 5.17**. This EIR analyzes the reasonable and foreseeable direct and indirect impacts of the proposed General Plan that are expected, or could be expected, to occur during the planning horizon. As discussed within this EIR, the proposed General Plan would result in significant and unavoidable impacts to the environment (i.e., concerning Aesthetics; Agriculture and Forestry Resources; Air Quality; Cultural Resources; Geology, Soils, and Mineral Resources; Greenhouse Gas Emissions; Noise; Transportation; and Tribal Cultural Resources; and Utilities and Service Systems) despite the incorporation of mitigation measures and compliance with proposed General Plan policies. Therefore, other activities, facilitated by the proposed General Plan as described above, have the potential to significantly affect the environment. However, it is noted that while the proposed General Plan could encourage or facilitate other activities that may increase growth or potential environmental impacts, the mitigation measures; programs; proposed General Plan policies; and compliance with local, State, and federal regulations would ensure that potential environmental impacts are minimized, where feasible.

Barstow International Gateway (BIG)

As described above, BIG would foster economic growth but would not require increased public services at a level that would significantly affect the environment or burden public service agencies, as discussed throughout this EIR. Additionally, the utility extensions are not anticipated to facilitate other activities, such as unplanned population growth, which would result in significant environmental effects, since the improvement of the BIG footprint and surrounding areas are acknowledged and incorporated into the future growth plans within the City's proposed General Plan and the utility extensions are intended to serve BIG. The location of future growth within the City and in unincorporated San Bernardino County would continue to be controlled by the City and County as guided by their adopted general plans. Therefore, BIG would not encourage or facilitate other activities that could significantly affect the environment, either individually or cumulatively.

7.4 REFERENCES

Barstow Community College. 2024. Barstow Community College Catalog. https://www.barstow.edu/sites/default/files/media/pdf_document/2024/2425_Catalog_v2.pdf.

Carollo. 2025. *Draft Citywide Wastewater and Sewage Capacity Analysis.*

Southern California Association of Governments (SCAG). 2024. Connect SoCal. https://scag.ca.gov/sites/default/files/2024-05/23-2987-connect-socal-2024-final-complete-040424.pdf.