2.0 COMMENTS AND RESPONSES

2.1 LIST OF PUBLIC AGENCIES, ORGANIZATIONS, AND INDIVIDUALS COMMENTING ON THE DRAFT EIR

In accordance with State CEQA Guidelines §15132, the public agencies, organizations, and individuals commenting on the Draft Environmental Impact Report (Draft EIR) are listed below in **Final EIR Table 2-1: List of Commenting Public Agencies, Organizations, and Individuals**. As indicated in **Final EIR Table 2-1**, comments on the Draft EIR were received from 30 public agencies, 25 organizations, and 1,996 individuals.

Table 2-1: List of Commenting Public Agencies, Organizations, and Individuals

No.[1]	Letter Date	Author Name	Author Title	Agency or Organization
Public Agencies (Federal ("F"), State ("S"), Local ("L"))				
F1	01/05/26	Scott Caine Davis	Community Planner	Marine Corps Logistics Base (MCLB) Barstow
F2	1/12/2026	Connell Dunning	Environmental Review Branch	U.S. Environmental Protection Agency (US EPA)
S1	12/5/2025	Anh Truong	Senior Utilities Engineer	California Public Utilities Commission (CPUC)
S2	12/15/2025	William Graulty	Office Technician	California Governor's Office of Emergency Services (CAL OES)
S3	12/17/2025	Christine Lemonds	AGPA	California Highway Patrol (CHP)
S4	12/23/2025	Scott Jakubowski	Senior Environmental Scientist (Specialist)	California Department of Fish and Wildlife (CDFW)
S5	1/5/2026	Thomas Lackey	Assemblyman	34th District CA Assembly
S6	1/5/2026	Matthew O'Donnell	Chief, Risk Reduction Branch	California Air Resources Board (CARB)
S7	1/5/2026	Janki Patel	Branch Chief – Local Development Review	California Department of Transportation (Caltrans)
S8	1/12/2026	Cindy Casaneda	Senior Environmental Scientist (Supervisor)	CDFW
L1	12/10/2025	Sam Wang	Program Supervisor, CEQA IGR	South Coast Air Quality Management District (SCAQMD)
L2	12/20/2025	Brad Poiriez	Executive Director	Mojave Desert Air Quality Management District (MDAQMD)
L3	12/10/2025	Brad Poiriez	Executive Director	MDAQMD
L4	12/11/2025	Michael A. Krause	Assistant Deputy Executive Officer	SCAQMD
L5	12/16/2025	Mario Cordero	Chief Executive Officer	Port of Long Beach
L6	12/17/2025	Ron Clark	President, Board of Directors	Helendale Community Services District
L7	12/18/2025	Yvonne Kliewer	Administrative Secretary	City of Hesperia
L8	12/17/2025	Liz Becerra	Mayor	City of Victorville

No.[1]	Letter Date	Author Name	Author Title	Agency or Organization
L9	12/23/2025	Kody Tompkins	Director of O&M	Victor Valley Wastewater Reclamation Authority (VVWRA)
L10	12/23/2025	Ariel Lafarga	Executive Assistant	Lahontan Regional Water Quality Control Board (RWQCB)
L11	12/27/2025	Tony Winkel	Senior Principal Hydrogeologist	Mojave Water Agency (MWA)
L12	1/5/2025	Brianna Unzueta	Office Specialist III	San Bernardino (SB) County Superintendent of Schools
L13	12/18/2025	Scott Nassif	Mayor	Town of Apple Valley
L14	1/7/2026	Samuel Martinez	Executive Officer	Santa Barbara County Local Agency Formation (SBLAFCO)
L15	1/7/2026	Deanna Swearingen	Superintendent	Barstow Unified School District
L16	1/9/2026	Rey Gonzales	Sr. Project Manager	Southern California Edison (SCE)
L17	1/9/2026	Sam Wang	Program Supervisor	SCAQMD
L18	1/12/2026	David Libatique	Deputy Executive Director	Port of Los Angeles
L19	1/12/2026	Nancy J. Sansonetti	Supervising Planner	County of San Bernardino
L20	1/13/2026	Paul Gonzales	Planning Chief	County of San Bernardino
Organizations				
O1	11/12/2025	Eugene Butticci	Executive Director	Barstow Chamber of Commerce
O2	11/10/2025	Mark Creffield	President/CEO	Greater High Desert Chamber of Commerce
O3	11/18/2025	John Rader	Business Development & Marketing Director	Barstow Community Hospital
O4	11/21/2025	Marven E. Norman	Environmental Policy Analyst	Center for Community Action and Environmental Justice (CCAEJ)
O5	12/03/2025	Scott Martin	Board President	Barstow Community Hospital
O6	12/04/2025	Mary Tran	CEO	EXP
O7	12/11/2025	Albert D. Hernandez	Business Manager/President	SMART Local Union 105
O8	12/12/2025	Todd Barry	Business Agent	Road Sprinkler Fitters UA Local 669
O9	12/11/2025	David S. Osborne	President	District Council of Iron Workers of the State of California (DCIW)
O10	12/12/2025	Frankie Jimenez	Business Manager	Ironworks Local 416
O11	12/15/2025	Joe Raymond	Business Manager	UA Plumbers Pipefitters Local 364
O12	12/15/2025	Jason L. Eshelman	Business Manager/Financial Secretary	The International Brotherhood of Electrical Workers (I.B.E.W.) Local Union 477
O13	12/15/2025	Keith Harkey	Business Manager	Ironworks Local 433
O14	12/18/2025	Julie Hackbarth-McIntyre	President, Board of Trustees	Barstow Community College
O15	12/18/2025	Dr. Gil Keinan	Managing Director	Local Equity LLC
O16	12/18/2025	Amanda Simpson	Director, Public Relations, Communications and Marketing	Barstow Community College

No.[1]	Letter Date	Author Name	Author Title	Agency or Organization
O17	12/30/2025	Johnathon Montanto	Paralegal	Western States Regional Council of Carpenters (WSRCC)
O18	12/31/2025	Latrina Wallaca	Executive Director	Trin'Naz Helping Hands
O19	1/5/2026	Sophia Markowska	Senior California Representative	Defenders of Wildlife
O20	12/30/2025	Jeff McKellar	President	Silver Lakes Association
O21	1/12/2026	Yessenia Moreno	Senior Litigation Assistant/ Legal Practice Administrator	Earthjustice
O22	1/12/2026	Adriana Rizzo	Founding Members	Californians for Electric Rail (CER)
O23	1/12/2026	Maddock Thomas	Researcher, Public Rail Now	Public Rail Now (PRN)
O24	1/12/2026	Shannon Labuschagne	N/A	Center for Biological Diversity
O25	1/12/2026	Kristeen Penrod	Director	Science & Collaboration for Connected Wildlands (SC Wildlands)
Individuals				
I1 through II1996 comment letters from Individuals are listed in numeric order and alphabetical order (by Last Name) in **Final EIR Appendix 2.0-1: List of Individual Comment Letters** due to the volume of Individual comments received.				

1) For ease of reference, each comment letter has been uniquely labeled/numbered, as indicated in this table. The responses are also labeled/numbered and correlate to each comment letter.

2.2 COMMENTS AND RESPONSES STRUCTURE

In accordance with State CEQA Guidelines §15132, this section includes the comments received on the Draft EIR. To facilitate ease of access, the comments are organized according to author (i.e., Public Agencies (Federal, State, and Local), Organizations, and Individuals); see also **Final EIR Section 1.0: Introduction**. This section also includes the City's Consolidated Responses to repetitive/similar issues raised in the review and consultation process.

Each comment letter listed in **Final EIR Table 2-1** is reproduced on the following pages. For ease of reference, each letter and the individual comments in each letter have been uniquely/consecutively numbered according to grouping, as specified in **Final EIR Table 2-1**.

Pursuant to State CEQA Guidelines § 15088(a), the City has prepared written responses to comments raising significant environmental issues received during the public review period and has elected to respond to various late comments. The responses, which are provided following each comment letter, are numbered and correlated to the bracketed and identified portions of each comment letter.

The individual responses may include text revisions to clarify or amplify Draft EIR information, as a result of environmental issues raised in the comments or as determined by the City. A response requiring Draft EIR revisions presents the relevant Draft EIR text in a box, with text deleted from the Draft EIR indicated by ~~strike-through~~ and text added to the Draft EIR indicated by <u>double underline</u>, as follows:

~~text deleted from the Draft EIR~~
<u>text added to the Draft EIR</u>

Final EIR Section 3.0: Errata to the Draft EIR includes a summary of the Draft EIR text revisions, organized by Draft EIR Section.

2.3 CONSOLIDATED RESPONSES

In accordance with State CEQA Guidelines §15132, this section includes the City's Consolidated Responses to repetitive/similar issues raised in the review and consultation process. These Consolidated Responses have been prepared to efficiently address recurring themes and issues raised by multiple commenters, improve the responses' comprehensiveness, and reduce repetition.

The Consolidated Responses, which are provided in the pages that follow, are organized according to the topical areas listed below. For ease of reference, each Consolidated Response has been uniquely/consecutively numbered, as follows:

- Consolidated Response 01: Community outreach and the Draft EIR public review period, as follows:
    - Consolidated Response 01-01: Community Outreach
    - Consolidated Response 01-02: Draft EIR Public Review Period
- Consolidated Response 02: Significant and Unavoidable Impacts and the Statement of Overriding Considerations
- Consolidated Response 03: Recirculation
- Consolidated Response 04: General Non-CEQA Issues, as follows:
    - Consolidated Response 04-01: Scope of CEQA
    - Consolidated Response 04-02: Opinions on the Project's Merits
- Consolidated Response 05: Feasible and Enforceable Mitigation, as follows:
    - Consolidated Response 05-01: Requirements for Mitigation Measures
    - Consolidated Response 05-02: Feasibility
    - Consolidated Response 05-03: Reasonable Period of Time
    - Consolidated Response 05-04: Economic Infeasibility
    - Consolidated Response 05-05: Mitigation Enforceability
    - Consolidated Response 05-06: Feasibility of Specific Technologies and Other Mitigation Measures
- Consolidated Response 06: Potential Effects on Communities, as follows:
    - Consolidated Response 06-01: Geographic Scope
    - Consolidated Response 06-02: Socio-Economic Impacts
    - Consolidated Response 06-03: Community Safety
    - Consolidated Response 06-04: Quality of Life
    - Consolidated Response 06-05: Decreased Property Values
- Consolidated Response 07: Potential Impacts Concerning Hazardous Materials
- Consolidated Response 08: Increased Rail Activity's Effects Concerning Delay at At-Grade Crossings, as follows:
    - Consolidated Response 08-01: Increased Rail Activity's Effects Concerning Traffic Delay,

  - Consolidated Response 08-02: Increased Rail Activity's Effects Concerning Traffic Queue Lengths,
  - Consolidated Response 08-03: Increased Rail Activity's Effects Concerning Delays in Emergency Response
- Consolidated Response 09: BIG's Potential Effects on the Sylvan Community, as follows:
  - Consolidated Response 09-01: Consideration of the Sylvan Community in the Draft EIR and as a Sensitive Receptor
  - Consolidated Response 09-02: Consideration of Sylvan Community in the Noise and Vibration Analyses
  - Consolidated Response 09-03: Consideration of Sylvan Community in the Air Quality Analysis
  - Consolidated Response 09-04: Consideration of Sylvan Community in the Hydrology and Water Quality Analyses
  - Consolidated Response 09-05: Consideration of Sylvan Community in the Lighting Analysis
  - Consolidated Response 09-06: Consideration of Cumulative Impacts to the Sylvan Community
  - Consolidated Response 09-07: Consideration of Impacts to Sylvan Community Private Water Wells
  - Consolidated Response 09-08: Consideration of Sylvan Community Biological Resources
  - Consolidated Response 09-09: Consideration of Sylvan Community Cultural Resources
  - Consolidated Response 09-10: Consideration of the Sylvan Community in the Hazardous Materials Analysis, including Arsenic Levels/Mobilization
  - Consolidated Response 09-11: Consideration of Alternatives to Minimize Impacts to the Sylvan Community
- Consolidated Response 10: BIG'S Potential Effects on the Silver Lakes/Helendale Community, as follows:
  - Consolidated Response 10-01: Accessibility Concerns near the Silver Lakes/Helendale Community
  - Consolidated Response 10-02: Increased Rail Activity's Effects Concerning Traffic Delays at the Silver Lakes/Helendale Community At-Grade Crossings
  - Consolidated Response 10-03: Increased Rail Activity's Effects Concerning Emergency Response Delays at the Silver Lakes/Helendale Community At-Grade Crossings
  - Consolidated Response 10-04: Increased Rail Activity's Effects Concerning Traffic Delay and School Transportation Needs
  - Consolidated Response 10-05: Cumulative Impacts to the Silver Lakes/Helendale Community
  - Consolidated Response 10-06: Feasible and Enforceable Mitigation for the Silver Lakes/Helendale Community

  - Consolidated Response 10-07: Potential Impacts on the Silver Lakes/Helendale Community
  - Consolidated Response 10-08: Potential Impacts on the Silver Lakes/Helendale Community Concerning Hazardous Materials
  - Consolidated Response 10-09: Increased Rail Activity's Effects on Traffic Delay and Decreased Property Values
- Consolidated Response 11: Energy and Power Supply
- Consolidated Response 12: Project Description and Enforceability, as follows:
  - Consolidated Response 12-01: Project Description Requirement Under CEQA
  - Consolidated Response 12-02: Whole of the Project
  - Consolidated Response 12-03: Enforceability of the Project Components and Mitigation Measures for the Project
- Consolidated Response 13: Speculation Without Substantial Evidence and Requests for Additional Analysis and Study
- Consolidated Response 14: Consideration of a Range of Reasonable Alternatives
- Consolidated Response 15: Truck Miles Traveled Analysis, as follows:
  - Consolidated Response 15-01: Use of National TMT Data
  - Consolidated Response 15-02: Disclosure of Local Truck Miles Traveled Attributable to BIG
  - Consolidated Response 15-03: Disclosure of Local Truck Trips Attributable to BIG
- Consolidated Response 16: Battery Energy Storage System (BESS)
- Consolidated Response 17: Health Impact Analysis

CONSOLIDATED RESPONSE 01: COMMUNITY OUTREACH AND DRAFT EIR PUBLIC REVIEW PERIOD

Some comments were concerned with the amount and quality of community outreach and public engagement about the Project, including the Draft Environmental Impact Report's (EIR's) public review period. This Consolidated Response addresses the various issues raised in such comments.

Consolidated Response 01-01: Community Outreach

The City conducted nearly 2.5 years of focused community engagement concerning the Project (i.e., the proposed General Plan and BIG), beginning in October 2022, and lasting until the Draft EIR was released for public review in November 2025. A comprehensive summary of past engagement activities is provided in the Draft General Plan Introduction, with related materials posted on the City's website at: https://www.barstowca.org/departments/community-development-department/planning/general-plan-update. The City has facilitated extensive community outreach throughout the process of evaluating the proposed General Plan. This included meetings with a wide range of community groups including, but not limited to, local neighborhoods, small businesses, seniors and veterans, and the Marine Corps Logistics Base. Key questions and concerns raised during these meetings were summarized and made publicly available on the Barstow Chamber of Commerce website. For a record of the questions raised and discussions held during each meeting, see https://barstowchamber.com/category/barstow-international-gateway/.

Additionally, BNSF presented at numerous public meetings to provide updates and receive feedback from stakeholders and residents. Notable events included town hall meetings at the Barstow College Performing Arts Center (April 26, 2023; October 3, 2024; and March 20, 2025), which were widely advertised and open to the public. Methods of public advertisement included posting dates and times of upcoming events to the City of Barstow's website, and social media. A dedicated meeting with Sylvan Avenue residents was held at the Hinkley Community Center on November 19, 2025, to address specific concerns of those living near BIG.

Consolidated Response 01-02: Draft EIR Public Review Period

On November 9, 2025, the Notice of Availability (NOA) was filed with the Clerk of the County of San Bernardino, with a public review period start date for the broader public of November 10, 2025. On November 13, 2025, the Notice of Completion (NOC) and NOA were filed with the State Clearinghouse, Office of Land Use and Climate Innovation (LCI). The State Clearinghouse distributed the Draft EIR to state agencies on November 13, 2025, starting the review period for public agencies. To provide adequate time for public review, the deadline for the Draft EIR public review period was initially set to January 5, 2026, and subsequently extended by seven days to January 12, 2026.

A number of comments requested an extension of the Draft EIR public review period, expressing concern that the review period was not enough time to review the Draft EIR given the Project's scope. Comments requested time extensions ranging from 15 to 45 additional days. The time periods for various Project components are shown in **Final EIR Table 1: Environmental Impact Report Milestones**. All of these review

and comment periods were in parallel with or in addition to other public outreach activities and meetings, as documented in the Introduction section of **Draft EIR Appendix 3.0 GP-1 Proposed General Plan**.

Table 1: Environmental Impact Report Milestones

Milestone	Required	Date	Actual
Notice of Preparation (NOP)			
Begin NOP Comment Period		Thursday, February 15, 2024	
Scoping Meeting		Wednesday, March 13, 2024	
End Public NOP Comment Period		Tuesday, March 26, 2024	
Days Available for NOP Comment	30		40
Notice of Availability (NOA)			
Published Victorville Daily Press		Sunday, November 9, 2025	
EIR Posted on City Website		Sunday, November 9, 2025	
Filed with San Bernardino County Clerk		Monday, November 10, 2025	
Notice of Completion LCI		Thursday, November 13, 2025	
Begin Public Comment Period Local		Monday, November 10, 2025	
Begin Public Comment Period LCI		Thursday, November 13, 2025	
Original End of Public Comment Period		Monday, January 5, 2026	
Extension of Public Comment Period		Friday, January 2, 2026	
Close of Public Comment Period		Monday, January 12, 2026	
Days Available for EIR Comment Local	45		63
Days Available for EIR Comment	45		60

The City's process to develop this EIR, in most cases, extended beyond the minimum time periods established under CEQA. An EIR that is submitted to State Clearinghouse for review, as the Draft EIR for the Project was, is required to undergo a review period of at least 45 days. The State CEQA Guidelines state "[t]he public review period for a draft EIR shall not be less than 30 days nor should it be longer than 60 days except under unusual circumstances" (State CEQA Guidelines § 15105(a)). Lead and responsible agencies may use their discretion to extend such time periods to allow for additional public review and comments in accordance with these standards.

The Draft EIR was made available for review and comment to the public, responsible and trustee agencies, interested groups, and organizations, with a review period that was longer than the minimum 45 days but consistent with the 60-day maximum per State CEQA Guidelines § 15105(a). The Draft EIR was made available for public review at the following locations:

- Accessed via https://www.barstowgeneralplanupdate.com
- City of Barstow Community Development Department, 220 East Mountain View Street, Suite A, Barstow, CA 92311
- Barstow Community College Library, 2700 Barstow Road, Barstow, CA 92311
- Barstow Branch Library, 304 East Buena Vista Street, Barstow, CA 92311

The Draft EIR, all supporting technical documents, and all documents submitted to or relied upon by the City in preparation of the Draft EIR, were made available on the City's website at https://www.barstowca.org/departments/community-development-department/planning/barstowgeneralplanupdate-com/documents-for-public-review-download-ver1, consistent with SB 149 requirements.

Regarding the Final EIR, pursuant to State CEQA Guidelines § 15088(b), a lead agency shall provide a written response to a public agency on comments made by that public agency at least 10 days prior to certifying the Final EIR. The lead agency has met these requirements in this **Final EIR Section 2.0: Responses to Comments** and has also provided a NOA of the Final EIR to all who have requested notice by giving contact information to the City or commenting on the Draft EIR. The Final EIR was made available to the public at City Hall and on the City's website on May 8, 2026—8 days in advance of the public hearing for the Planning Commission and 25 days before consideration of certification of the Final EIR at the City Council public hearing.

CONSOLIDATED RESPONSE 02: SIGNIFICANT AND UNAVOIDABLE IMPACTS AND STATEMENT OF OVERRIDING CONSIDERATIONS

Some comments raised issues concerning Project impacts that remained significant and unavoidable after imposing all feasible mitigation. The EIR identifies any Project impacts that remain significant despite compliance with the existing regulatory framework and incorporation of feasible mitigation measures as significant and unavoidable. The Project's significant effects that could not be reduced to less than significant despite incorporation of mitigation measures are found in the "Project Impacts and Mitigation Measures" and the "Significant Unavoidable Impacts" subsections in **Draft EIR Sections 5.1** through **5.17**.

State CEQA Guidelines § 15091(a) specifies that no public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding.

State CEQA Guidelines § 15092(b)(2) specifies that a public agency shall not decide to approve or carry out a project for which an EIR was prepared unless the agency has:

(A) Eliminated or substantially lessened all significant effects on the environment where feasible as shown in findings under § 15091, and

(B) Determined that any remaining significant effects on the environment found to be unavoidable under § 15091 are acceptable due to overriding concerns as described in § 15093.

State CEQA Guidelines § 15093(a) specifies that CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."

If the City decides to certify the Final EIR and move forward with consideration of the Project, the City would be required to address any significant and unavoidable impacts pursuant to State CEQA Guidelines § 15091, prepare a Statement of Overriding Considerations[1] pursuant to State CEQA Guidelines § 15093, and determine whether any specific economic, social, and other considerations would outweigh the significant unavoidable impacts. The draft project entitlements include a draft Statement of Overriding Considerations for the Proposed General Plan and BIG Project for the City Council's review and approval.

CONSOLIDATED RESPONSE 03: RECIRCULATION

A number of comments assert that the Draft EIR should be revised to address issues raised in comments, republished, and recirculated for public comment. Normally, an EIR is circulated for only one round of review and comment by the public and by public agencies. However, under State CEQA Guidelines § 15088.5, an EIR or a portion thereof must be recirculated for a second round of review when the CEQA standards for recirculation are met. Examples of situations where recirculation is required include the following:

- New significant information becomes available after Draft EIR publication that results in any of the following conditions:
  - A new significant environmental impact would result from the project or from a newly proposed mitigation measure.
  - A substantial increase in the severity of an impact would result unless mitigation measures are adopted that reduce the impact to a less-than-significant level.
  - A new project alternative or mitigation measure that, based on substantial evidence, is (i) feasible, (ii) considerably different from the alternatives or mitigation measures already evaluated in the EIR, (iii) clearly lessens the project's significant environmental impacts, and (iv) is not adopted by the project proponent.
- The draft EIR was so fundamentally and basically inadequate and conclusory that meaningful review and comment were precluded.

New information is not significant unless the EIR is changed in a way that "deprives the public of a meaningful opportunity to comment upon a substantial environmental effect of the project or a feasible way to mitigate or avoid such an effect … that the project's proponents have declined to implement." (State CEQA Guidelines § 15088.5(a).) Recirculation is not required when the revisions to the Draft EIR merely clarify, amplify, or make insignificant modifications to an adequate EIR. (State CEQA Guidelines § 15088.5(b).) For example, where information is added to an EIR in response to a comment, but the additional information does not result in the identification of a previously undisclosed significant impact on the physical environment, recirculation is not required.

In accordance with State CEQA Guidelines § 15088, this Final EIR includes written responses to all comments received during the Draft EIR's public review period. As required by State CEQA Guidelines § 15132, the responses in this document address substantive environmental points raised by commenters as well as comments on the Draft EIR's content and adequacy. The responses are intended to provide

[1] *Available for review at the City of Barstow Community Development Department*, 220 East Mountain View Street, Suite A, Barstow, CA 92311.

clarification and refinement of information presented in the Draft EIR and, in some cases, to correct or update information in the Draft EIR. In some instances, the Draft EIR text has been revised. Modifications that address a specific comment received on the Draft EIR are presented in the response to the particular comment in this Section. All modifications to the Draft EIR text are presented in **Final EIR Section 3.0: Errata to the Draft EIR**.

Although information has been added to the Draft EIR as part of this Final EIR, no "significant new information" (i.e., no new significant impact, no substantial increase in the severity of an impact, or no feasible project alternative or mitigation measure that is considerably different from others previously evaluated but that will not be adopted, as stated above, pursuant to State CEQA Guidelines § 15088.5) has been added to the EIR since the Draft EIR's publication. As noted in responses to individual comments, discussion of each modification in the responses to comments in this document makes clear that no conditions under the first bullet of State CEQA Guidelines § 15088.5 are met. For these reasons, and as supported by substantial evidence in the administrative record, the EIR does not need to be recirculated.

Concerning the second bullet under State CEQA Guidelines § 15088.5, the City prepared the Draft EIR in accordance with CEQA requirements, and agencies and community members have engaged in substantive review of and comment on the document. See also **Consolidated Response 01-01** concerning community outreach and **Consolidated Response 01-02** concerning the Draft EIR public review period.

CONSOLIDATED RESPONSE 04: GENERAL NON-CEQA ISSUES

Many comments received on the Draft EIR address topics that do not relate to any specific section of the Draft EIR or to the environmental review process but rather relate to other aspects of the proposed Project or other subjects that are outside the purview of CEQA.

Consolidated Response 04-01: Scope of CEQA.

The California Environmental Quality Act (CEQA) is a 1970 state law that requires state and local agencies to identify, disclose, and mitigate significant environmental impacts of proposed discretionary projects. CEQA ensures public participation and transparency in decision-making, aiming to avoid or lessen environmental impacts. The State CEQA Guidelines are regulations that provide practical guidance to the lead agencies and the public on all parts of the CEQA process. As a result, some of the responses to comments in this Final EIR may refer to the State CEQA Guidelines in explaining why the City has responded to a comment in a certain way.

As introduced in the Draft EIR (page 4.0-3), CEQA requires the analysis of the proposed Project's potentially significant impacts on the environment. Specifically, "a significant effect on the environment is defined as a substantial adverse change in the physical conditions which exist in the area affected by the proposed project" (State CEQA Guidelines § 15002(g)). Comments regarding the Project's merits or matters that do not raise an environmental issue or specific questions about the analyses or information in the Draft EIR (i.e., non-CEQA comments) do not require response pursuant to State CEQA Guidelines § 15088.

Nonetheless, several comments raise concerns that are non-CEQA related, even as part of discussion of environmental topics, and in most cases, individual responses are provided specifically to those comments

in this document; see **Final EIR Sections 2.3** through **2.6**. In addition, certain non-CEQA issues raised in comments are addressed (all or in part) in the other Consolidated Responses in this Section.

This Consolidated Response responds to other recurring non-CEQA themes that are not closely related to any of the more specific Consolidated Response topics in this Section. These general non-CEQA themes do not address specific concerns with the Draft EIR and its evaluation of impacts or alternatives and they do not raise any environmental issues that are within the scope of CEQA. The specific non-CEQA themes addressed in this Consolidated Response tend to express opinions and the statements that are rarely accompanied with supporting evidence. Nevertheless, many of the themes address topics of valid concern to the community or the City. Moreover, because the comments were submitted during the public review period on the Draft EIR, they nonetheless constitute part of the public record that will be available to decision makers as part of the EIR, including this Response to Comments when they consider whether to approve or disapprove the Project.

Consolidated Response 04-02: Opinions on the Project's Merits

This group of comments consists of opinions and observations of numerous commenters expressing support for or opposition to the proposed Project. Representative comments in support of and opposition to the Project are wide ranging. Lead agency review of environmental issues and project merits are both important in the decision of what action to take on a project and both are considered in the decision-making process for a project. While CEQA only requires that a lead agency respond to environmental issues that are raised, all letters in support and all letters in opposition of the Project are included in this Final EIR for consideration by the decision makers in consideration of the proposed Project.

Due to the volume of support letters, a single copy is provided in **Final EIR Section 2.0: Comments and Responses**, and a table listing the individual comment letters is provided. The actual support letters are included on the City's website: www.barstowca.org.

The City also received letter from commenters consisting of opinions and observations expressing their opposition to the proposed Project, but without corresponding environmental comments on the Draft EIR. For transparency in the process, these comments are included in this Final EIR. Comments in opposition that do include environmental comments on the Draft EIR are responded to individually in this **Final EIR Section 2.0: Comments and Responses.**

CONSOLIDATED RESPONSE 05: FEASIBLE AND ENFORCEABLE MITIGATION

The commentors expressed concerns about the feasibility of mitigation or the adequacy of the range of mitigation measures. Additionally, several comments questioned whether the Draft EIR identifies all feasible mitigation measures to reduce impacts to the maximum extent feasible. This Consolidated Response outlines CEQA's general requirements for identification and consideration of mitigation measures. See **Consolidated Response 05-06** concerning the feasibility of specific technology and other mitigation measures.

Consolidated Response 05-01: Requirements for Mitigation Measures

Mitigation is required only for significant environmental impacts (PRC 21100(b)(3); State CEQA Guidelines §§ 5126.4(a)(1)(A) and 15064(e)). CEQA requires that an EIR identify ways in which significant environmental impacts can be lessened in severity or avoided, including by the adoption of feasible and effective mitigation measures (State CEQA Guidelines § 15126.4). Under CEQA, mitigation measures must reduce the severity of potentially significant impacts, their effectiveness must be clear, and they must be enforceable (State CEQA Guidelines § 15126.4(a)).

The Draft EIR, prepared in accordance with the State CEQA Guidelines, identified the Project's significant environmental impacts. The analyses' findings are detailed within the "Project Impacts and Mitigation Measures" subsections across **Draft EIR Sections 5.1** through **5.17**. State CEQA Guidelines § 15126.4(a)(1) specifies that an EIR shall describe feasible measures, which could minimize significant adverse impacts. Mitigation measures presented in the Draft EIR, as amended in the Final EIR, identify the Project sponsor, its agents (including in some instances, qualified biologists and contractors), or successors as the parties responsible for implementing the mitigation measure, and indicate when the measure is to be implemented.

Consolidated Response 05-02: Feasibility

CEQA defines feasible as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors" (State CEQA Guidelines § 15364). This definition is relevant to the development of mitigation measures, given CEQA's requirement to "describe feasible measures which could minimize significant adverse impacts" (State CEQA Guidelines § 15126.4(a)(1)). One key measure of feasibility is whether the City has the authority to require the applicant to carry out the mitigation. CEQA does not grant the City any powers it does not already have (State CEQA Guidelines § 15040(b)). This means that mitigation suggested outside of the City's jurisdiction or powers, or preempted by other provisions (e.g., federal laws), is infeasible because the City does not have the authority to ensure implementation of those mitigation measures. Mitigation measures are also required to be consistent with applicable constitutional and statutory requirements, including being "roughly proportional" to the impacts and legal for the Lead Agency to impose (State CEQA Guidelines § 15126.4(a)(4&5)).

Feasibility is also relevant to the findings that agencies must adopt at the time of project approval based on the certified EIR and other evidence in the record (State CEQA Guidelines § 15091(a)). In these findings, the agency must find that "specific economic, legal, social, technical, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures… identified in the Final EIR (State CEQA Guidelines § 15091(a)(3)). Consideration of feasibility of mitigation measures may also be based on practicality.[2] CEQA "does not demand what is not realistically possible, given the limitation of time, energy, and funds."[3] An EIR should focus on mitigation measures that are feasible, practical, and effective.[4]

[2] *No Slo Transit, Inc. v. City of Long Beach (1987)* 197 Cal.App.3d 241, 257.

[3] *Concerned Citizens of South Central Los Angeles v. Los Angeles Unified Sch. Dist. (1994*) 24 Cal.App.4th 826, 841.

[4] *Public Resource Code § 21003(c); Napa Citizens for Honest Govt. v. Napa County Bd. of Supervisors (2001*) 91 Cal.App.4th 342, 13 365.

Per these requirements, the City has complied with its legal obligation under CEQA to include mitigation measures that substantially lessen or avoid significant environmental effects to the extent feasible. The mitigation measures presented in the Draft EIR represent the expert opinions of the Draft EIR preparers regarding how best to effectively, and feasibly, substantially reduce or avoid the Project's significant environmental effects. Moreover, all mitigation measures included in the Draft EIR are within the City's ability to ensure implementation, a key measure of feasibility. The chosen mitigation measures have been subjected to public review and scrutiny through the Draft EIR public review process and as noted above, have been amended as appropriate as a result of the public review process. **Final EIR Section 3.0: Errata to the Draft EIR** includes text revisions to the Draft EIR, including to mitigation measures. The text revisions are intended to clarify or amplify the mitigation measure/information in the Draft EIR, as initiated by the City or in response to the comment letters. None of the mitigation measure revisions/clarifications identified in this Final EIR constitutes "significant new information" pursuant to State CEQA Guidelines § 15088.5. The mitigation measure revisions/clarifications merely clarify/amplify and make minor modifications.

The Draft EIR contains mitigation measures that the City, as lead agency, believes are necessary to address potentially significant impacts and that are feasible to implement except where noted otherwise. There are some instances where the Draft EIR concludes that the mitigation would reduce the severity of the impact, but the feasibility of one or more of the required actions to reduce the impact to less than significant cannot be determined at this time. In these instances, the impact is identified as significant and unavoidable and the City's obligation is to adopt all feasible mitigation to reduce the severity of the impact. For example, concerning air quality, **Draft EIR Appendix 5.3 BIG-1** pages 171 to 174 describe the 14 viable mitigation measures to reduce air quality impacts, which were included in the Draft EIR, while Draft EIR pages 175 to 181 describe mitigation measures considered but deemed infeasible. The feasibility reports further explain the City's determination concerning mitigation measures:

- *Zero Emission Trucks Feasibility Evaluation for Barstow International Gateway (ZE Truck Feasibility Report)*, Kimley-Horn, et al. dated April 24, 2026.
- *A Power Plan for the Barstow International Gateway (Power Budget Memorandum)*, Burns & McDonnell, dated March 2026.
- *Feasibility of Electric Rubber Tire Gantry (RTG) Canes Technical Memorandum (eRTG Feasibility Memorandum)*, Prepared by Rod Haney (Managing Member of Transport Equipment Consulting, LLC), dated March 2026.
- *Feasibility Analysis of New Propulsion Locomotive Technologies and Overhead Catenary for the BIG Project (BEL and Catenary Feasibility Analysis)*, Prepared by Michael E. Iden. P.E., dated March 2026.
- *Operational and Economic Feasibility for BEL Switchers and Linehauls (BEL Economic Feasibility Memorandum)*, Burns & McDonnell, et al., dated March 13, 2026.
- *Operational Feasibility of Power Swapping BEL Linehaul Locomotives at BIG and Other Operational Challenges for BEL Switchers (Power Swapping Memorandum),* by Travis Thowe (BNSF Director of Network Strategy) and Mike Swaney (BNSF Director of Advanced Energy Innovation), dated February 27, 2026.

- *Analysis of BELs: San Pedro Bay Ports to Barstow (Benchmark Report)*, prepared by Garrett Anderson, Benchmark Data and Control, dated March 2026.
- *BIG's Viability Due to Suggested Zero-Emission Mitigation Measures (Zero-Emission Impacts on BIG Viability)*, prepared by Brad Womack (BNSF), dated April 2026.
- *Capacity at BNSF Los Angeles Hobart and San Bernardino (BNSF Hobart and San Bernardino Railyard Capacity Memorandum)*, prepared by Ryan Sickler, dated March 9, 2026.
- *BNSF Barstow International Gateway Corridor Emissions Model Analysis Errata (CEM Errata),* prepared by Michael Choi, dated February 2026.
- *Regional Air Quality Modeling and Health Impact Analysis for the Barstow International Gateway (HIA Report)* (BlueScape), dated April 2026.

A number of comments on the Draft EIR suggested additional mitigation measures where the impact is identified as significant and unavoidable. In determining whether to accept a commenter's suggested changes, either in whole or in part, the lead agency in the Final EIR can consider, among other things, the following factors: (i) whether the proposed revisions are feasible from an economic, technical, operational, legal, environmental, or other standpoint; (ii) whether the proposed revisions would be effective in mitigating the impact or represent a clear improvement, from an environmental standpoint, over the draft language that a commenter seeks to replace; and (iii) whether the proposed revisions are sufficiently clear as to be easily understood by those who will implement them. The suggestions in these comments have been evaluated and responded to in individual responses. Consistent with State CEQA Guidelines § 15088(c), each individual response indicates where a suggested strategy has been incorporated into existing mitigation measures or contains a reasoned analysis as to why a suggested strategy has not been included based on the standards discussed above and to the discussion of feasibility in the Draft EIR.

The City recognizes that comments frequently offer thoughtful suggestions regarding how a commenter believes that a particular proposed mitigation measure can be modified, or perhaps changed significantly, to more effectively, in the commenter's view, reduce the severity of environmental effects. In addition, while a lead agency is required to respond to comments proposing concrete, obviously feasible mitigation measures, it is not required to accept suggested mitigation measures.[5] The City took seriously every suggestion made by commenters and appreciated the effort that went into the formulation of suggestions. City staff and consultants spent significant time carefully considering proposed suggestions for new and revised mitigation measures and in some instances adopted some or all of what a commenter suggested. The City has identified, and proposed to incorporate, all feasible mitigation measures, including feasible revisions to the existing mitigation measures recommended by commenters. The feasibility of other specific suggested measures is discussed in the individual responses in the Section, as appropriate. Consistent with CEQA Guidelines § 15088(c), each individual response indicates where a suggested strategy has been incorporated into existing mitigation measures or contains a reasoned analysis as to why a suggested strategy has not been included based on the standards discussed above.

[5] *A Local and Regional Monitor (ALARM) v. City of Los Angeles* (1993) 12 Cal.App.4th 1773, 1809.

Consolidated Response 05-03: Reasonable Period of Time

Feasibility under CEQA has a temporal element: feasible measures are those that can be implemented "within a reasonable period of time," taking into account economic, technological, and other factors (State CEQA Guidelines § 15364). This temporal standard was recently evaluated in Nat. Res. Def. Council, Inc. v. City of Los Angeles (2023) 98 Cal.App.5th 1176, which involved contentions that feasibility should be determine over the lifetime of a 40-year operational lease based on whether the mitigation measure could be accomplished during some part of that time period. The court affirmed the lead agency's determination some measures were infeasible even in the context of a 40-year lease, based on the agency's substantial evidence the measure was not feasible "within a reasonable period of time" with respect to zero emission technology. For example, where the lead agency evaluated that zero and near-zero emissions drayage trucks would be commercially available, it also found that there were weight, charging time, range, charging infrastructure, and limited supply issues that limited that feasibility. Likewise, the agency found that natural-gas powered near-zero emission trucks do not pose serious operational feasibility challenges to widespread deployment, but concluded there were major challenges for natural gas fueling infrastructure to expand regionally and at a fast enough pace to support large-scale deployment. The court upheld these findings as supported by substantial evidence, noted that CEQA has no "immediacy" requirement for determining feasibility, and held that the feasibility of a mitigation measure within a reasonable period of time was correctly judged in a holistic manner. Finally, the court held that an agency may deem a mitigation measure infeasible even if that measure is commercially available in the near future if implementing that measure just at the project site would not lead to market changes and could hurt the project's competitiveness economically.

Implementation of a mitigation measure based on future commercial availability or future coordination with external parties can also be infeasible.[6] The City has identified, and proposed to incorporate, all feasible mitigation measures within a reasonable period of time, including revisions to the existing mitigation measures recommended by commenters that could be implemented in a reasonable period of time.

Consolidated Response 05-04: Economic Infeasibility

Under CEQA, a mitigation measure may be found infeasible on economic grounds. (PRC § 21081(a)(3); State CEQA Guidelines, § 15091(a)(3).) Findings of economic infeasibility must be supported by relevant

[6] *Concerned Citizens of S. Cent. L.A. v Los Angeles Unified Sch. Dist.* (1994) 24 CA4th 826, 841 (collaborating with other agencies to rehabilitate housing impacted by the project was not required as a mitigation measure, as it would constitute a project as complex, ambitious, and costly as the project itself).

economic evidence.[7] For private projects, the question is whether the marginal cost of the mitigation measure or alternative is so high that a reasonably prudent property owner would not proceed with it.[8]

The court in Uphold Our Heritage v Town of Woodside (2007) 147 Cal.App.4th 587, 601 explained that economically infeasible measures are ones that render the project impractical.

> *"Economic unfeasibility is not measured by increased cost or lost profit, but upon whether the effect of the proposed mitigation is such that the project is rendered impractical. The fact that a project costs too much to be profitable or cannot operate at a profit so as to render it impractical does not hinge on the wealth of its proponent. No proponent, whether wealthy or not, is likely to proceed with a project that will not be economically successful. But, if the project can be economically successful with mitigation, then CEQA requires that mitigation, regardless of the proponent's financial status … Accordingly, the question is not whether [the applicant] can afford the proposed alternative, but whether the marginal costs of the alternative as compared to the cost of the proposed project are so great that a reasonably prudent property owner would not proceed with the rehabilitation."*

Thus, a finding of economic infeasibility must be based on substantial evidence that allows for a court to make a meaningful economic comparison. Evidence of costs alone is insufficient; rather, it is the magnitude of the marginal costs that determines the feasibility of the mitigation measure. Marginal costs so great that the project is rendered impractical and a reasonably prudent person would not proceed with the project would be economically infeasible under CEQA. While confidential applicant financial data information need not be provided, cost information must be sufficiently detailed to allow a court to make a comparison. Courts have not established a brightline rule about how much evidence is sufficient to determine economic infeasibility.

The Draft EIR finds certain BIG mitigation measures economically infeasible in the context of other factors. For example, a noise barrier (i.e., sound wall) analysis was conducted (Draft EIR page 5.12-84) to determine noise barriers to be financially feasible as mitigation to reduce BIG operational noise impacts; see also **Consolidated Response 05-06** below. The Draft EIR supports findings of economic infeasibility with evidence showing that some mitigation measures could balloon costs or hinder operations so much that they would render BIG unviable.

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7 *See City of San Diego v Board of Trustees of Cal. State Univ.* (2015) 61 Cal.4th 945, 955 [state agency's infeasibility finding was inadequate when it was based on mere anticipation of state legislature's refusal to make earmarked appropriation for mitigation and no other funding source was considered]; Uphold Our Heritage v Town of Woodside (2007) 147 Cal.App.4th 587, 601 ("Woodside") [findings of economic infeasibility of alternatives to demolition were not supported by data comparing the cost of building new home with cost of rehabilitating existing historic home on site]; County of San Diego v Grossmont Cuyamaca Community College Dist. (2006) 141 Cal.App.4th 86, 108 ("Grossmont College District") [community college's proportional share of cost of off campus traffic mitigation measures could not be found economically infeasible in absence of cost estimates].

8 *Compare Woodside, supra, Cal.App.4th at 601* [record lacked evidence of cost of constructing new home and thus did not support conclusion that alternative of renovating historic mansion was economically infeasible] to Sustainability, Parks, Recycling and Wildlife Legal Defense Fund ("SPRAWLDEF") v San Francisco Bay Conserv. & Dev. Comm'n (2014) 226 Cal.App.4th 905, 917-18 [record supported economic infeasibility of local marsh protection program because record provided context with comparative figures of cost].

Consolidated Response 05-05: Mitigation Enforceability

Certain commenters questioned whether the City can be relied upon to ensure that adopted mitigation measures are implemented. The City is the lead agency and thus is responsible for considering the adequacy of and certifying the Final EIR; considering the merits of the proposed Project and, if it chooses, approving the Project; and adopting a Mitigation Monitoring and Reporting Program (MMRP), as part of the findings pursuant to CEQA.

As required by State CEQA Guidelines § 15126.4(a)(2), and as noted in several comments, mitigation measures must be "fully enforceable through permit conditions, agreements, or other legally binding instruments." The City would adopt all mitigation measures in the Draft EIR as conditions of Project approval unless, as noted above, they are determined by the City to be infeasible based on "specific economic, legal, social, technological, or other considerations" supported by substantial evidence in the record at the time of project approval (State CEQA Guidelines §§ 15091(a)(3) and 15091(b)).

State CEQA Guidelines § 15097 requires the lead agency to adopt a MMRP that establishes how the agency would monitor implementation of the adopted mitigation measures. The MMRP is the mechanism for ensuring that mitigation measures are carried out as required, and would ensure compliance with related provisions of AB 734 (Public Resources Code § 21168.6.7(d)(5)). The MMRP reflects steps established in the mitigation measures by requiring the entity responsible for implementation to submit reports to the lead agency or other responsible entity at specific points in the development process.

If the City considers the merits of the proposed Project, and determines to approve it with the EIR mitigation measures as conditions of approval, CEQA also requires City decision makers to adopt certain findings, including a finding that "changes or additions have been required in, or incorporated into, the project" to avoid significant impacts, and findings regarding whether those changes are within the jurisdiction of the agency (State CEQA Guidelines § 15091(a)).

Consolidated Response 05-06: Feasibility of Specific Technologies and Other Mitigation Measures

A number of commenters stated or implied that the Draft EIR should have included additional mitigation measures, including zero-emission technologies, large-scale infrastructure, such as overpasses and sound walls, and other measures. This consolidated response addresses those comments by discussing the applicability and feasibility of these specific measures and why, consistent with the principles discussed above in **Consolidated Responses 05-01** through **05-04**, they cannot be implemented for BIG. This Consolidated Response and expert reports described below were developed to address comments on the Draft EIR.

Silver Lakes Overpass/Bridge – Helendale Road to National Trails Highway:

Comments requested that a measure be imposed that would require the construction of an overpass near the Silverlake Community. As explained below, this measure is not proportional to BIG's impacts and, thus, is not permissible mitigation under CEQA. First, as noted in the At-Grade Crossing Evaluation (see **Consolidated Response 08** below for the increased rail activity's effects concerning delay at at-grade crossings), the additional delay at the affected crossing would be, on average, very minimal (less than two

seconds in additional delay, as shown on Tables 6 and 7). A mitigation measure "must be 'roughly proportional' to the impacts of the Project." (State Guidelines § 15126.4(a)(4)(A).) There is no nexus between this minimal increase in delay and the replacement of an at-grade crossing with a grade-separated crossing. CEQA also does not require mitigation measures or consideration of alternatives for preexisting environmental problems; a project does not need to solve for existing problems assumed as part of the baseline conditions.[9] The crossing is identified within the San Bernardino County 2025-26 Capital Improvement Plan[10] and is referred to as "Bridge – Helendale Rd. to National Trails Highway" for Index No. 33 in Exhibit C for 2025-26 Capital Improvement Program Projects, denoting it is a regional improvement within the County's jurisdiction that should ultimately be constructed via the County. See **Consolidated Response 10** for a full discussion of BIG's potential effects on the Silver Lakes Community.

Additional Sound Walls:

Some comments suggested that sound walls be constructed along various portions of BIG. Noise barriers would potentially require installation of noise walls on private property, in a designated right-of-way, or otherwise outside the City's jurisdiction, which may not be allowed by a property owner or the jurisdiction in which the sound barrier would be located. The feasibility and effectiveness of noise walls is also restricted by access requirements for driveways, cross streets, underground utilities, other noise sources in the area, and safety considerations. Finally, construction of a noise barrier would potentially "wall off" existing neighborhoods or individual residences from the surrounding community, which could result in adverse aesthetic, land use, and public safety impacts. Additionally, noise walls on these segments would block existing residential and commercial entrances from street view, which could result in potential aesthetic/public safety impacts by reducing visibility and accessibility.

Draft EIR Appendix 5.12 BIG-1 Section 6.1 (page 120) includes the Noise Barrier Financial Feasibility Analysis – On-Site Facility Noise, which evaluated reasonable and feasible mitigation of potential noise barriers to reduce noise impacts. As discussed in the Noise Barrier Financial Feasibility Analysis, the basis for the analysis included the cost per benefited receptor as provided in the Caltrans Noise Analysis Protocol methodology for financial feasibility, which was $146,000 per benefited receptor at the time the Draft EIR was prepared. Conservatively, the financial feasibility analysis designated a benefited receptor to be any receptor that experiences a noise reduction of 1BA or more as a result of the recommended noise abatement. The Draft EIR evaluated five noise barrier options, and determined that only three (BAR-2, BAR-3, and BAR-5) were financially feasible, as shown in **Draft EIR Appendix 5.12 BIG-1 Table 47** (page 121).[11] As such, the Draft EIR evaluated and proposed to incorporate all feasible mitigation to reduce potential operational noise impacts.

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9 *In re Bay-Delta Programmatic Envtl. Impact Report Coordinated Proceedings* (2008) 43 Cal.4th 1143, 1168.

10 *San* Bernardino *County, 2025, 2025-2026 Adopted Budget, Exhibit C, 2025-26 Capital Improvement Program Projects,* Administered by Department of Public Works – Transportation, page 364, Available at https://main.sbcounty.gov/wp-content/uploads/sites/80/2025-26-Adopted-Budget-Book.pdf

11 *It is noted, BAR-2 has been removed from MM NOI-2 as described in the Final EIR and MMRP, given that it was initially proposed for the sole and exclusive purpose of abating noise from the Battery Energy Storage System* (BESS), which BIG does not now propose. See **Consolidated Response 16** concerning BESS, and **Final EIR Section 3.0: Errata to the Draft EIR** for proposed edits to the Draft EIR text concerning the BESS.

Zero Emission Locomotive Propulsion Technologies

Battery Electric Locomotive (BEL) Linehaul and Switcher Locomotives

The Feasibility Analysis of New Propulsion Locomotive Technologies and Overhead Catenary for the BIG Project, Prepared by Michael E. Iden. P.E., dated March 2026 (*BEL and Catenary Feasibility Analysis*), responded to comments submitted by Earthjustice, et al., including the commenter's attached report (attached as Appendix A to the Earthjustice letter), the California Air Resources Board (CARB), the South Coast Air Quality Management District (SCAQMD), and others, concerning the application of battery-electric locomotives (BELs) (both in line haul and switcher service) to BIG. These comments include, but may not be limited to: O21-114, O21-129, S6-2, S6-13, S6-15, and L17-43. The *BEL and Catenary Feasibility Analysis,* as well as the Operational and Economic Feasibility for BEL Switchers and Linehauls (BEL Economic Feasibility Memorandum), Burns & McDonnell, et al., dated March 13, 2026 *BEL Economic Feasibility Memorandum,* and *Operational Feasibility of Power Swapping BEL Linehaul Locomotives at BIG and Other Operational Challenges for BEL Switchers,* by Travis Thowe (BNSF Director of Network Strategy) and Mike Swaney (BNSF Director of Advanced Energy Innovation, February 27, 2026 (*Power Swapping Memorandum),* individually and collectively, as well as the facts and evidence cited in these reports, constitute substantial evidence that BELs are not "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." (State CEQA Guidelines § 15364.)

Setting and Background

Trains are four times more energy-efficient than trucks, on average moving one ton of freight approximately 500 miles on just a single U.S. gallon of diesel fuel.[12] BNSF is more fuel-efficient, on average moving one ton of freight approximately 870 miles per gallon of diesel fuel.[13] Rail transport is more energy efficient than road transport because there is less friction between incompressible steel wheels on incompressible steel rails than between compressible (deformable) rubber tires and asphalt.[14]

The U.S. rail network is a vital component of the U.S. transportation system and supply chain, responsible for nearly 30% of goods movement and an intercity passenger rail service that stretches from coast to coast.[15] Despite handling a third of all U.S. intercity freight volume, rail accounts for just 2% of all U.S. transportation-related greenhouse gas (GHG, carbon dioxide or CO_2) emissions.[16]

A single train can remove hundreds of trucks from the highway, reducing traffic congestion, fuel costs, and road wear and tear (with all public roadway maintenance funded by federal and/or state funds).[17]

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12 *Kruse, C., Farzaneh, R., Glover, B., Warner, J., Steadman, M., Kim, B., and D. Lee. 2022. A Modal Comparison of Domestic Freight Transportation Effects on the General Public: 2001–2019*. National Waterways Foundation. https://www.nationalwaterwaysfoundation.org/file/28/TTI%202022%20FINAL%20Report%202001-2019%201.pdf.

13 *Based on data published 2026, BNSF consumed 1.15 gallons of diesel for every 1,000 gross ton miles (GTMs) moved in 2024.* To derive the miles moved per gallon, 1,000/1.15 = approximately 870. Source: https://www.bnsf.com/news-media/railtalk/community/fuel-efficiency-and-emissions-reduction.html

14 *An Action Plan for Rail Energy and Emissions Innovation, December 2024 "Source: DOE"; "Materials developed by DOE"* https://www.energy.gov/sites/default/files/2024-12/doe-eere-modal-reports_rail-energy-emissions-action-plan.pdf Page 6

15 *An Action Plan for Rail Energy and Emissions Innovation, December 2024 "Source: DOE"; "Materials developed by DOE"* https://www.energy.gov/sites/default/files/2024-12/doe-eere-modal-reports_rail-energy-emissions-action-plan.pdf Page 13

16 *Data derived from* https://www.epa.gov/system/files/documents/2024-04/us-ghg-inventory-2024-main-text_04-18-2024.pdf

17 https://www.aar.org/wp-content/uploads/2020/06/AAR-Positive-Environmental-Effects-of-Freight-Rail-White-Paper-62020.pdf pages 3&5.

Further, as railroads own, operate, pay taxes on, and maintain their networks, this helps reduce the need for taxpayer-funded highway expansion.[18]

Unlike highways—which often have multiple lanes and shoulders that can absorb breakdowns—the rail network involves railway track, which is a single-path, capacity-constrained system on which a disabled train can block the line and create cascading delays for other trains scheduled behind it. "Cascading" means one train delay leads to other train delays (a "service spiral"). Even in areas with multiple (two or more) mainline tracks, a train delayed (because of, for example, a locomotive failure) can still create cascading train delays. This linear nature of the rail network means it is essential that innovative technologies *must* be rigorously evaluated and tested in real world contexts to meet reliability standards.

BNSF's BIG Project would use Tier 4 diesel-electric locomotives in the Ports-Barstow rail corridor. BNSF is also committed to use only Tier 4 switcher locomotives at the BIG site. These Tier 4 locomotives meet the US EPA's most stringent emission standards for new diesel locomotives and are substantially cleaner than all other commercially ready-and-available locomotives.[19] For comparison, Tier 3 line haul locomotives (built between 2012-2014) were the cleanest locomotives prior to Tier 4 (first built in 2015). U.S. EPA Tier 4 NOx standards are 76 percent (1.3 vs 5.5 g/bhp-hr.) and PM emission standards are 70 percent (0.03 vs 0.10 g/bhp-hr.) cleaner than Tier 3 locomotives.[20] This commitment to Tier 4 is significant. For Class I Railroad line haul fleets, for example, in 2023 only four percent were Tier 4.[21]

BELs Are Not "Commercially Ready" for Application to BIG

To evaluate whether BELs (both line hauls and switchers) are "capable of being accomplished in a successful manner within a reasonable period of time," feasibility must be evaluated as applicable to the BIG in terms of scope, scale and schedule. To meet this standard *all* five of the conditions listed below – which taken together establish "commercial readiness" – must be met. The below summarizes the five criteria and feasibility conclusions.

1. The technology has achieved sufficient "technical readiness" during experimentation and "prototyping" to warrant a locomotive manufacturer continuing its development.
    - **Conclusion: There are fewer than six BELs undergoing prototyping and pre-production evaluation; it is unknown whether or when manufacturers will continue their development.**
2. That prior to sale, and use of BELs in commercial service, the railroad has prepared and the Federal Railroad Administration (FRA) has approved, if approval is requested by FRA, a "safety analysis" pursuant to 49 CFR 229 Subpart E "Locomotive Electronics." This review, which could take several months to prepare and receive approval, is essential to demonstrate operational feasibility for widespread deployment on the rail network.

18 *Rail Transportation and the U.S. Economy: Fueling Growth, Trade, and Opportunity,* February 28, 2025, Association of American Railroads.
19 *Non-Confidential Portion of General Electric's presentation to CARB November 14, 20214*. Attachment B of this paper.
20 https://www.ecfr.gov/current/title-40/chapter-I/subchapter-U/part-1033.
21 *Ibid*.

- **Conclusion: No Class 1 railroad has yet prepared an FRA safety analysis needed before commercial service begins because no BELs have been delivered to such railroads for commercial service.**

3. The experimental and prototype technology and locomotive design has progressed to "pre-production status" and been validated in statistically significant numbers by being operated and maintained on actual railroads by railroad employees (not merely being "run around a circular test track at a dedicated test facility") to allow potential hidden and imminent component and operational failures to be identified and corrected.

    - **Conclusion: There are not statistically significant numbers of BELs being operated and maintained on actual railroads. As of this writing, there are only four line-haul BELs which have been delivered to a customer (in Australia), none of which has any reported operating data.**

4. Railroads have individually established a pre-determined reliability target (such as 55,000 mean miles between road failures, equivalent to not exceeding 1.82 line-of-road failures per locomotive-year for a locomotive that operates 100,000 miles per year) and this target has been achieved and can be verified. This is known as a "reliability growth test" (RGT) fleet. Reliability growth testing is the *"... process of operating-and-maintaining a new product in preproduction phase with incremental identification and correction of component failures."* This means a "test, fail, analyze and retest" process to identify hidden failures, identify why the failures occurred, redesign the component, install revised components, and then continue testing. RGT testing ends when the locomotive has reached a predetermined reliability goal as described above.

    - **Conclusion: Reliability targets (such as 55,000 mean miles between road failures, equivalent to not exceeding 1.82 road failures per locomotive-year for a locomotive that operates 100,000 miles per year) have not been established, much less achieved, for any of the BELs discussed in the BEL and Catenary Feasibility Analysis.**

5. One or more locomotive builder is prepared to begin commercial production.

    - **Conclusion: It would be premature for the manufacturers to begin commercial production before the earlier milestones have been met and validated.**

These critical considerations – which were not considered in any meaningful way in the Draft EIR comments referenced above – are *fundamental* to a feasibility determination for locomotive propulsion technologies.

Summary of Expert BELs "Commercial Readiness" Conclusions

A full analysis of "commercial readiness" is provided in *Section VI. BEL Technical Readiness Does Not Equal Commercial Readiness* of the BEL and Catenary Feasibility Analysis. However, the chart below summarizes *all* current and past orders for both line-haul BELs (10) and heavy-duty switcher BELs. BELs using modern lithium-ion battery cells have had exceptionally limited mainline revenue-service experimental demonstration compared with the scale of typical Class I line-haul operations. For example, BNSF and

Wabtec[22] reported a single initial (very-first experimental prototype designed and assembled as a "proof of concept") battery-electric freight BEL that accumulated only 18 round-trips totaling 12,800 miles of testing between January and April 2021.[23] This demonstration is minuscule when compared to the regular utilization of a fleet of proven road locomotives in revenue service of at least 100,000 miles per locomotive each year.[24]

For example, when General Electric (GE Transportation) introduced a similar entirely innovative technology to meet the EPA Tier 2 standards in 2005, it invested $100 million to assemble a GE-owned test fleet of fifty (50) Tier 2 locomotives and had the Class 1 railroads accumulate over 10 million miles of pre-production testing during a 2-year time span (2013-2014).[25]

Only one BEL designed for heavy-duty switching has been built, the Progress Rail Locomotive "Joule" that was the subject of a demonstration on (not sold to) Pacific Harbor Line at the Ports of Los Angeles and Long Beach from 2023-2025. That prototype proof-of-concept switcher BEL ended its demonstration in late-2025 and the manufacturer chose to have it dismantled and scrapped in January 2026.

CARB describes interstate line-haul locomotives as operating long hours over demanding corridors and notes that battery-electric line-haul applications still face challenges related to reliability, durability, energy density, safety, and charging infrastructure.[26] For Class 1 railroad mainline propulsion and railyard switching operations, and for the BIG Project in particular, BEL technology has not been vetted and validated for long-term reliability. Mainline and switcher BELs as they have been assembled and presented by Wabtec and Progress Rail Locomotive, in Mr. Mike Iden's expert opinion, are not "commercial ready" and will not be in the foreseeable future. In the context of CEQA's "*capable of being accomplished in a successful manner within a reasonable period of time"* standard, the EIR fully analyzes all feasible options for BIG.

22 *Wabtec is a Fortune 500 company that manufactures new locomotives, as well as products for locomotives, freight cars and passenger transit vehicles*.

23 *BNSF Railway, "BNSF and Wabtec Commence Battery Electric Locomotive Pilot Test in California,"* press release, January 4, 2021

24 https://www.elkarbide.com/sites/default/files/ge_locomotoras.pdf

25 https://www.elkarbide.com/sites/default/files/ge_locomotoras.pdf

26 *California Air Resources Board, *Technology Assessment: Freight Locomotives** (Sacramento: CARB, 2016)

ALL BELs ORDERED SINCE 2019

ENGINEERING EXPERIMENTAL TEST BELs

Order #	1	2
Builder >	**Wabtec**	**Progress**
Customer >	Wabtec	Anacostia-PHL
Date announced >	09/24/19	11/13/20
Comment >	test & prototype	test & prototype
Line-Haul or Switch	**Line-Haul**	**Switcher**
Number of BELs >	**1**	**1**
Battery MWh >	2.4	2.4
Motors >	4	6
Location>	Tehachapi test	Ports of LA & LB
Status	**BACK>FACTORY**	**SCRAPPED**
Date delivered >	05/01/21	04/01/23
Years to complete >	1.6	2.4

PRE-COMMERCIAL BELs

Order #	3	4	5	6	7
Builder >	**Wabtec**	**Progress**	**Progress**	**Wabtec**	**Wabtec**
Customer >	Roy Hill	Forescue	BHP WAIO	CN	Rio Tinto
Date announced >	9/13/21	1/7/22	1/17/22	11/4/21	1/10/22
Comment >	pre-commercial	pre-commercial	pre-commercial	pre-commercial	pre-commercial
Line-Haul or Switch	**Line-Haul**	**Line-Haul**	**Line-Haul**	**Switch**	**Line-Haul**
Number of BELs >	**1**	**2**	**2**	**1**	**4**
Battery MWh >	7	14.5	14.5	2.7	7
Motors >	6	8	8	6	6
Location>	Australia	Australia	Australia	U.S.	Australia
Status>	**NEVER SHIPPED**	**DELIVERED**	**SHIPPED**	**TO BE BUILT IN 2026**	**CANCELED**
Date delivered >	n/a	12/12/2025	TBD	TBD	n/a
Years to complete >	n/a	3.9	TBD	TBD	n/a

PRE-COMMERCIAL BELs (continued)

Order #	8	9	10	11
Builder >	**Wabtec**	**Progress**	**Progress**	**Wabtec**
Customer >	BHP WAIO	BNSF	Union Pacific	Union Pacific
Date announced >	1/17/22	1/22/22	1/28/22	1/28/22
Comment >	pre-commercial	pre-commercial	pre-commercial	pre-commercial
Line-Haul or Switch	**Line-Haul**	**Switch**	**Switch**	**Switch**
Number of BELs >	**2**	**1-to-4**	**10**	**10**
Battery MWh >	7	8	2.4	2.7
Motors >	6	6	6	6
Location>	Australia	U.S.	U.S.	U.S.
Status>	**DELIVERED**	**CANCELED**	**CANCELED**	**6 CANCELED; 4 BEING BUILT**
Date delivered >	11/17/2025	n/a	n/a	TBD
Years to complete >	3.8	n/a	n/a	TBD

Operational and Economic Constraints of BELs

In addition to not being "commercially ready," line haul and switcher BELs would be operationally and economically infeasible for BIG for the reasons set forth in the *BEL Economic Feasibility Memorandum*.

Additional Operational Constraints of BEL Line Hauls (Power Swapping)

In addition to not being "commercially ready," and being otherwise not operationally and economically feasible for the reasons described above, line haul BELs would be operationally infeasible for BIG for the reasons set forth in BNSF's Power Swapping Memorandum, as described below.

The *Power Swapping Memorandum* concludes switcher BELs require switching activities nearly quadruple compared to diesel locomotives due to the need to return to a charging station at least once per shift.

In sum, to avoid the unacceptable detrimental operational effects, BIG operations and the railyard would need to be substantially modified in terms of design and operation to allow for use of BELs. From an operational standpoint and business perspective, it would not be reasonable to design and develop a $4 billion railyard to accommodate technology that is speculative, unproven, and cannot be implemented within a reasonable period. Mandating such a requirement would be so impractical that no reasonable business would pursue the project with such a substantial investment in uncertain and speculative technologies.

Response to Comments Raising 2024 CARB Ports to Barstow BELs Feasibility Analysis:

Several comments raise a 2024 CARB *Feasibility Analysis: Zero Emission Train from the Port of Los Angeles to Barstow*, wherein CARB develops its own estimates for train energy, fleet sizing, and charger infrastructure sizing for the rail corridor between the Ports and Barstow.[27] These comments are fully addressed in *Analysis of BELs: San Pedro Bay Ports to Barstow,* prepared by Garrett Anderson, Benchmark Data and Control, March 2026 (*Benchmark Report*), which is attached to and considered in the *BEL and Catenary Feasibility Analysis*. The *Benchmark Report* provides a full discussion of the operational limitations of BELs and the current financial and operational limitations of this locomotive propulsion technology.

Hybrid Linehaul and Switchers

As demonstrated in the *BEL and Catenary Feasibility Analysis* hybrid locomotives have substantially lower power capabilities compared to conventional diesel counterparts, with prototypes currently in service only possessing a 2.4 MWh battery. This battery capacity only allows for limited functions to be performed "zero-emission." That limited function not only lessens the environmental and emissions benefits of hybrid locomotives, it also constrains the power of BSNF's fleet.

A "hybrid consist", a multi-unit locomotive where one or more BELs are included in combination with diesel locomotives) reduces the overall power of that train (also known as a "consist"). In order to utilize hybrid locomotives, BNSF would either need a greater number of locomotives for all trains operating in this consist configuration, or would need to reduce the size of all such trains to accommodate lower capacity. Additional feasibility concerns with hybrid locomotives are documented in the *BEL and Catenary Feasibility Analysis.*

Full or Intermittent Overhead Catenary Systems

Section 1.3: Full or Intermittent Overhead Catenary of the BEL and Catenary Feasibility Analysis also responded to comments suggesting that BIG incorporate full or intermittent catenary on the rail corridor between the Ports and BIG. These comments include S6-15, O21-14, O21-87, O21-124 to O21-128, O23-1, and I1892-1.

[27] *These comments include O21-104, 114, 115, 116, 117, 120, 121, 124 and 127.* Notably, CARB itself did not cite or raise its own report in its own comment letter.

Unlike BELs, rail electrification is a globally mature technology, but it remains dependent on large public capital investments in the overhead catenary (wires) and connections to the electrical grid, long construction lead times, plus uninterrupted availability of grid energy. External disruptions or potential disruptions – public safety power shutoffs (PSPS), wildfires, extreme weather, or grid failures—can interrupt electric supply and potentially halt rail operations on electrified corridors until power is restored. In the rail freight context, even a short interruption can result in potentially catastrophic impacts to the national supply chain.

Other reasons that full or intermittent catenary is not a feasible alternative propulsion technique for the BIG Project for operational and economic reasons, include:

- Operationally, because the rail network is a linear system, an energy disruption could cause a disabled train to block the line and create cascading delays for other trains scheduled behind it. "Cascading" means one train delay leads to other train delays (a "service spiral").
- Public funds have funded all electrified systems in the United Kingdom, Europe, Russia, China, India, and South Africa and for all currently electrified passenger and freight catenary systems in the United States. For the BIG Project to bear such massive additional costs would render it economically infeasible as it would result in a loss of competitiveness so that a reasonably prudent business would not proceed with the Project.
- European and other countries' freight systems bear little, if any, resemblance to the US freight system,[28] as they have no double-stack trains and only have light, small trains to prevent any delay for passenger trains that use the same track.
- Under CEQA, the cost of mitigation must be "roughly proportional" to the significant impacts. Here, the marginal benefits of a catenary system are very low.
- It would take 9-20+ years to build a full or limited catenary system which would be incompatible with the BIG Project's COD (opening year) in 2028 to begin to take trucks off the road; see **Table 2** below. Thus, it would directly conflict with BIG's Project Objectives, making proceeding with BIG *untenable and impractical* to a reasonable prudent business.

For all these operational, economic, and legal reasons, catenary electrification is not feasible within a reasonable period of time and would render the BIG Project so impractical that a reasonable business would not proceed with the development of BIG.

Electrification of the BNSF mainline route would prevent BNSF from achieving BIG's planned opening date for at least 9 years to 20 years-plus. Such a substantial delay would fail to satisfy the CEQA feasibility requirement that any mitigation or alternative is "*capable of being successfully accomplished within a reasonable period of time,"* considering economic, environmental, legal, social, and technological factors.

The costs of just the catenary – the electrical wires which would power the trains – was also considered. The Association of American Railroads (AAR) has projected catenary costs of $8 million per track mile. The Caltrain electrification project's catenary costs are estimated to be $12 million per track mile and a CARB study projected a total cost of $50 million per track mile. With BIG's total project costs being about

[28] https://www.freightwaves.com/news/why-is-europe-so-absurdly-backward-compared-to-the-u-s-in-rail-freight-transport.

$4 billion, catenary is not feasible under CEQA, considering economic, environmental, legal, social, and technological factors and "[t]he costs of catenary electrification are patently unreasonable and would render the Project so impractical that a reasonably prudent business would not proceed with its development."

Table 2: Catenary Cost Proportion of Total BIG Cost		
Elements	**Costs $ (In Billions)**	**Catenary $ / Project Costs $ %**
Total Proposed BIG Project Costs	4	
AAR Study (2025) – catenary $8 million per track mile[29]	1.4	35%
Caltrain – catenary $12 million per track mile[30]	2.1	52%
CARB – total costs $50 million per track mile[31]	8.7	218%

Marginal Benefits of Zero Emission Technology

Under CEQA, mitigation measures are also required to be "roughly proportional" to the significant impacts found in an EIR. (State CEQA Guidelines § 15126.4(a) (4&5)) Here, the benefits of zero emission technology are marginal compared to the enormous costs. The improvement from Tier 4 locomotives to zero emission (either through BELs or through catenary) would result in less than 1% reduction in pollutant concentrations compared to the high reductions already achieved through Tier 4.

Also, only *significant impacts* are subject to the mitigation requirement under CEQA. (Pub. Resources Code § 21002.) The Draft EIR concludes BIG's significant air quality impacts are limited to ground level impacts associated with diesel particulate matter (DPM) in the vicinity of the BIG footprint and mass emissions of certain criteria pollutants in the Mojave Desert Air Basin. Except for cumulative impacts (which are conservatively assumed for certain criteria pollutants and not for DPM), there are no significant impacts in the South Coast Air Basin. See **Draft EIR Table 5.3-40: Unmitigated Net Operational DPM Emissions Along Corridor (Tons per Year)** (page 5.3-161). Thus, additional mitigation measures can be imposed under CEQA.

Industry-Wide Solutions Are Necessary

As noted, CEQA does not require projects to solve for broader environmental problems.[32] The authors of the *BEL and Catenary Feasibility Analysis* state:

> *"Based on my extensive professional experience in the rail and goods movement industries, it is my professional opinion that technological innovation and the successful*

[29] AAR Study of Catenary Electrification of the North American Class I Railroad Network: https://www.aar.org/wp-content/uploads/2025/02/Final-Electrification-Report-02252025.pdf.

[30] Caltrain: https://www.caltrain.com/news/cost-caltrain-electrification-increases-project-track-2024 https://www.caltrain.com/media/21596/ https://calelectricrail.org/faq/ https://www.caltrain.com/media/30254/download.

[31] CARB - 2016 Technology Assessment: Freight Locomotives *(November 2016)* -- https://ww2.arb.ca.gov/sites/default/files/2020-06/final_rail_tech_assessment_11282016%20-%20ADA%2020200117.pdf.

[32] *In re Bay-Delta Programmatic Envtl. Impact Report Coordinated Proceedings* (2008) 43 Cal.4th 1143, 1168.

> *deployment of new locomotive propulsion technologies to the point of "feasibility," as evaluated in this Report, must be driven by manufacturers and their internal business decisions and by regulatory changes. Successful innovation is never driven by so-called "technology-forcing" on a single commercial enterprise at the project level under a statute like CEQA. In fact, such a strategy will only hinder progress because it makes innovative, unique and climate-friendly projects like BIG impractical to proceed with development from a business standpoint. Rather,* **industry-wide solutions** *– which ensure both economic competitiveness and technological consistency throughout the integrated national supply chain – is necessary. Industry-wide solutions are the only way to recognize and maintain the interconnected and interoperable nature of North American freight railroads. Failure to implement such an approach would render an investment untenable and impractical to pursue from a business standpoint."*

Electric RTGs

The Feasibility of Electric Rubber Tire Gantry (RTG) Canes Technical Memorandum, prepared by Rod Haney (Managing Member of Transport Equipment Consulting, LLC) dated March 2026 (eRTG Feasibility Memorandum), responded to comments submitted by Earthjustice, concerning the application of eRTGs to BIG, including, but may not be limited to Comments O21-132, O21-133, and O21-142. The *eRTG Feasibility Memorandum*, and the facts and evidence cited therein, constitute substantial evidence that eRTGs are not "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." (State CEQA Guidelines § 15364.)

As an initial matter, eRTGs are not operationally viable at BIG because BIG would require ramp and de-ramp eRTGs, which are not commercially available from any known manufacturer. Commenter confuses stacking cranes currently utilized at the Ports with *ramp/de-ramp* cranes. BIG's RTGs would be ramp/de-ramp cranes to facilitate the movement of containers between trains and trucks. Ramping and de-ramping is a substantially different role than stacking cranes, which are the eRTGs that commenter highlights at the Ports. The only eRTGs that are commercially available are stacking cranes. For these reasons, commenter's infrastructure cost and lifetime fuel cost analyses comparing eRTGs and hybrid-electric RTGs are irrelevant and unnecessary given that eRTGs do not provide the core ramping/de-ramping functionality required at BIG. Commenter also omits the need for diesel-powered infrastructure to supplement eRTGs because of current inability to ramp/de-ramp. Notably absent from comments on the current use of eRTGs at the Ports is the fact that at the Port of Long Beach, 40 diesel-powered loaders are currently relied upon to ramp and de-ramp containers.

Given stacking RTGs and ramp/de-ramp cranes fulfill different operational purposes and are not interchangeable, use of electric stacking RTGs rather than ramp/de-ramp RTGs is unreasonable and impractical, and there are substantial operational constraints that preclude their use at BIG and make them infeasible. These operational constraints are outlined on Draft EIR pages 5.3-114 and 5.3-115. They include the substantial challenge of eRTGs needing to be "tied down" to a conductor bar, which restricts the area the crane can serve and would require doubling the number of RTGs to serve the same length of track. Because eRTGs need to be tied down, and because it therefore takes nearly an hour to move an

eRTG between tracks, it is functionally impractical to use a single eRTG for multiple tracks. In fact, it takes so long to move the eRTGs from one track to another at the Port of Long Beach that the Port does not bother to do so.

Electric RTGs also do not have the battery capacity to meet BIG's 24/7 operational demands and it is not possible to simply match RTG activities to periods of high solar generation, as suggested by comments, as BIG requires 24/7 operations. See *A Power Plan for the Barstow International Gateway, Burns & McDonnell,* March 2026 (*Power Budget Memorandum*).

It is further infeasible to mandate a "switch" to electric stacking RTGs at some indeterminate point in the future. First, it is entirely speculative when or if eRTGs will include ramp/de-ramp abilities within a reasonable time period given the technological and operational constraints described above. Second, the facility would be power-constrained and would not be able to handle a transition to a component (i.e., eRTGs) that requires substantial additional power. Including 11 eRTGs at BIG would add a minimum of 11 MW of additional power draw if all cranes were charged simultaneously (Draft EIR page 5.3-115) to a site with a 66 MW power budget (Draft EIR page 5.3-111).

Additionally, even if BIG were to secure additional power in the future, which is not viable as shown in the *Power Budget Memorandum*, this would mean that the hybrid RTGs that BNSF has already committed to as part of BIG (see **Consolidated Response 12-03**) would be replaced after only 7-10 years in service resulting in untenable asset loss. Additionally, relocating the eRTGs for periodic charging would also reduce operational time for each crane compared to hybrid counterparts. Cranes would sometimes have to move several miles to a charger, given that intermodal tracks are approximately three miles long. In the alternative, trackside charging stations would eliminate the need to relocate the cranes for charging, but would create fixed infrastructure choke points, rendering parts of the track unusable while the cranes are charging, thereby reducing the facility's effective capacity (Draft EIR page 5.3-115).

For the reasons above, due to the foregoing operational and economic constraints, imposition of an eRTG requirement would render BIG impractical to pursue to a reasonably prudent business.

Zero Emission (ZE)/Near-Zero Emissions (NZE) Heavy Duty Trucks

The *Zero Emission Trucks Feasibility Evaluation for Barstow International Gateway,* Prepared by Chris Shimoda (Shimoda Government Strategies LLC), Brad Womack (BNSF), Naomi Germain, PE, TE and Josh Rowe, EIT (both Kimley-Horn and Associates, Inc.), dated April 7, 2026 (*ZE Truck Feasibility Report*), responded to comments submitted by Earthjustice, CARB, and SCAQMD, among others, concerning the application of ZE/NZE heavy duty trucks at BIG. These comments include, but may not be limited to: L17-43, L17-44, O21-36, O21-77, O21-97, O21-146, S6-2, and S6-17. The *ZE Truck Feasibility Report*, as well as the facts and evidence cited therein, constitute substantial evidence that imposing ZE/NZE heavy duty truck requirements is not "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." (State CEQA Guidelines § 15364) "Trucks" as used in this Consolidated Response refer to heavy-duty vehicles as defined by 49 CFR § 523.6 – Heavy-Duty Vehicle. Truck travel on public roads and intra- and inter-state transport of goods containers.

Imposing ZE/NZE trucks at BIG is infeasible for two overarching and interrelated reasons. First, it is unreasonable and impractical to require only ZE/NZE trucks access BIG at the project-level. Second, there are operational, technological, and economic limitations to requiring ZE/NZE trucks at BIG.

ZE/NZE Trucks Not Required By Regulation

As an initial matter, there are no current state or federal regulations requiring ZE/NZE trucks now or in the future and recent actions of the U.S. Congress and the Trump administration have stripped the State of California of the regulatory authority to mandate ZE/NZE trucks under the State's Advanced Clean Truck (ACT) regulation or any other regulation. CARB adopted the ACT regulation (13 CCR § 1963) in June 2020, requiring manufacturers to transition from diesel trucks and vans to ZE Trucks beginning in 2024. By 2045, every new truck sold in California was to be ZE. The ACT regulation was intended to accelerate the transition of ZE Trucks by setting a ZE sales percentage requirement for manufacturers and a fleet reporting requirement for large employers.

The ACT regulation was granted a separate waiver in 2023 by the Biden administration. However, on May 22, 2025, the U.S. Senate voted to revoke the waiver granted for California's ACT rule and other mobile source regulations. On June 12, 2025, President Trump formally nullified California's ACT rule and Advanced Clean Cars II program (Congressional Resolutions H.J. Res 87 and J.J. Res 88, respectively). As a result, California currently has no authority to implement ACT. Additionally, there are no federal regulations that require the manufacture of ZE or NZE Trucks.

Industry-Wide Solutions are Necessary

Although the primary purpose of BIG is to shift good transportation from truck to rail, a portion of containers accessing BIG would arrive and leave by truck. Two-thirds of these trips, to and from Boron, the Central Valley, Las Vegas/Northern Arizona, and Victorville, would access BIG's intermodal facility due to its proximity to goods' origins or destinations. The remaining 1/3 of truck trips, from the Inland Empire and the Ports, would utilize BIG for its transload warehouse center.

Importantly, these trucks accessing BIG would not be owned or controlled by BNSF, but rather by BNSF's customers. BNSF has no authority to institute fleet mix requirements on its customers short of stating that it would not accept non-ZE Trucks attempting to utilize the facility.

A Competitive Industry

Without industry-wide NZE/ZE regulatory requirements, mandating ZE trucks at BIG would place a unique and costly burden on shippers. BIG would exist within the context of a highly price-conscious and price-competitive logistics marketplace where rail providers like BNSF have to compete for business from shippers.

Approximately 72% of the trucks accessing BIG (the goods from Boron, the Inland Empire, and the Ports) are expected to service discretionary international cargo known as inland point intermodal (IPI)[33] or reverse IPI, while the remaining truck traffic is expected to service domestic intermodal operations. The

[33] *"Inland point intermodal" is also referred to as "on-dock rail." IPI describes goods which travel from the Ports to domestic locations through intermodal operations.*

IPI demand in particular is highly price-sensitive. The Southern California Association of Governments noted in a 2013 report, "IPI demand is quite sensitive to price because it is truly discretionary cargo." Additionally, while BIG would be closer than other BNSF intermodal facilities (IMFs) to the Central Valley, Las Vegas/Northern Arizona, and Victorville, the benefit of shorter IMF-related truck trips is marginal for expected customers in these locations. If the cost of utilizing BIG was a surcharge because of a unique NZE/ZE requirement, there would be no reason other than extreme expediency for potential customers to shift their current operations to BIG.

Restricting the types of vehicles that can service BIG creates a severe disadvantage in an industry where no other rail providers have similar restrictions. One of the primary environmental benefits of BIG—beyond offering a mode shift for container movement from truck to rail—is that it would provide an intermodal facility closer to container origins and destinations than existing BNSF IMFs. These existing markets use well-established business models and have no obligation to shorten their routes to use BIG. Given the current state of industry adoption of ZE/NZE Trucks and the limitations of ZE/NZE Truck technology, it is unreasonably speculative to assume that most, or even any, of these moves currently use fleets of ZE or NZE Trucks. If BIG were to restrict access to non-ZE/NZE Trucks, its potential customers would continue to use the existing freight movement options, as this would be significantly more cost-effective, and offer far less risk, than adopting an entirely new fleet of ZE or NZE Trucks.

ZE/NZE Trucks Not Widely in Use in California

ZE/NZE Trucks remain a nascent technology (i.e., in its early stages). ZE/NZE trucks are currently not widely used in California, and it is entirely speculative that ZE/NZE trucks would be widely used with BNSF's customers within a reasonable period of time. For model year 2023, Daimler sold only 73 ZE Trucks out of a total of 3,595 trucks sold. Paccar sold 76 out of a total of 6,695 trucks sold. Volvo sold 44 out of a total of 1,369 trucks sold. Navistar sold *zero* out of a total of 863 trucks sold. Currently, only 1,226 highway-legal ZE Trucks designed for freight transport operate in California, roughly 0.5% of the total truck population.

BIG would not have the contracting influence or truck traffic to meaningfully move California towards additional ZE/NZE Truck adoption. Rail carriers like BNSF play no significant market role in the selection of trucking providers. Shippers/beneficial cargo owners (BCOs) can either hire drayage providers to conduct truck moves at either end of a rail movement or utilize third parties known as "intermodal marketing companies" (IMCs) to coordinate logistics of both the rail and trucking portions of a move. This arm's length arrangement with drayage trucking providers offers railroads no direct contractual ability to force drayage providers to undertake costly technology transitions.

BIG's operational footprint is also insufficient to force meaningful transition to ZE/NZE Trucks. At full operation, daily trips to BIG would represent a minuscule fraction of the estimated 245,800 trucks domiciled in California. With ample alternative transportation methods for shippers/BCOs, the potential customers of BNSF would likely bypass BIG for more cost-effective and flexible transload or intermodal facility options in the high desert, Inland Empire, near the Ports, or elsewhere in Southern California.

The Ports Acknowledge that an Industry-Wide Solution is Necessary for Trucks

The Port of Los Angeles (POLA) tried – and failed – to implement a truck mitigation measure at the project-level and its experience is instructive. In a 2008 EIR, POLA imposed a liquified natural gas (LNG) truck mitigation measure on a marine terminal project.[34] POLA initially, but wrongly, anticipated that LNG trucks would be prevalent at the Ports for drayage "within a reasonable time." However, that was not the case, and the operator could not successfully implement the measure. In 2017, POLA's consultant prepared an "*Assessment of the Feasibility of Requiring Alternative-Technology Drayage Trucks at Individual Container Terminals" (Ramboll Report),* which "determined that a terminal-specific mitigation measure requiring LNG-fuel or other zero-emissions drayage trucks was infeasible due to 'incompatib[ility] with the structure of the drayage industry,' technical limitations with LNG truck capabilities, and commercial impracticality due to the competitive disadvantage such a measure would cause to a single terminal in the face of other terminals not having such a requirement."[35]

In a 2019 Supplemental EIR (SEIR), the Port relied on Ramboll's analysis and conclusion in removing the mitigation measure and concluded that the ZE/NZE trucks were not sufficiently prevalent in the industry to impose at the project level, that such measure was therefore infeasible under CEQA and Port-wide solutions were required to transition to ZE/NZE Trucks.[36] Ultimately, the Port's expert conclusion, which was based on substantial evidence analogous to that presented in the *ZE Truck Feasibility Report* here, was affirmed in *NRDC*, 98 Cal.App.5th 1176. (Id. 1220 ["The analysis and opinions provided in the *Ramboll Report* are precisely the type of evidence on which an agency may rely in making necessary findings under CEQA (see State CEQA Guidelines § 15384, subd. (b) [Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts]. In *NRDC*, the Ramboll Report was substantial evidence that terminal-specific drayage truck mandates were infeasible for operational, technological, and economic reasons.

The Port's decision was also based on the Ports' 2017 Clean Air Action Plan[37] (2017 CAAP), which stated:

> "It is critical that the drivers, motor carrier companies, Ports, goods movement industry, cargo owners, agencies, and legislators all work together on solutions to address this problem in order to transition to a sustainable cleaner truck fleet and a drayage system that *does not place an undue burden on any particular party*."

The Ports' latest feasibility assessment, *the 2024 Feasibility Assessment for Drayage Trucks*,[38] continues to conclude that, "there is still a long way to go to achieve full market maturity and widespread adoption [of ZE/NZE drayage trucks]," due to several reasons including, "the transition to ZE technology…presents significant economic challenges, particularly due to the high upfront costs," and "infrastructure gaps remain a major barrier, especially outside the Port zone."

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34 *Natural Resources Defense Council (NRDC), Inc. v. City of Los Angeles* (2023) 98 Cal.App.5th 1176, 1218.

35 *NRDC*, supra, 98 Cal.App.5th at 1219.

36 *NRDC*, 98 Cal.App.5th at 1219.

37 *Port of Long Beach and Port of Los Angeles. November 2017*. San Pedro Bay Ports Clean Air Action Plan 2017: Final Clean Air Action Plan Update. Accessed March 2026 at: https://cleanairactionplan.org/2017-clean-air-action-plan-update/#

38 *Port of Long Beach and Port of Los Angeles.* September 2025. San Pedro Bay Ports Clean Air Action Plan: 2024 Feasibility Assessment for Drayage Trucks. Accessed March 2026 at: https://cleanairactionplan.org/strategies/trucks/.

International Council on Clean Transportation Study

Commenter cites a 2019 International Council on Clean Transportation (ICCT) TCO (total cost of ownership) study showing Battery Electric Truck (BET) cost convergence with diesel by the year 2030. But the ICCT study's assumptions have already proven to be unrealistically optimistic. The study assumes that the BET purchase price will fall below diesel trucks by 2026. But CARB data shows that the BET purchase price is nearly three times that of diesel trucks and over twice the price when including the generous $120,000 purchase credits through CARB's Heavy Vehicle Incentive Program. The study also assumes a rapid increase in BET support infrastructure that has not to date been realized, with limited charging infrastructure near BIG. The California Energy Commission's data shows that the nearest completed publicly available charging stations are approximately 70 miles from BIG in the Inland Empire, or approximately 130 miles from BIG in Bakersfield.

The ICCT study assumes only 1 to 3 percent larger BET fleets compared to traditional diesel truck fleets. More recent studies have found that due to weight, range, and charging considerations, 1.5 BETs would be required to replace a single diesel drayage truck. Other analyses from fleets operating zero-emission vehicles have been even less optimistic, with one sizeable fleet operator finding a need for two electric tractors for each diesel one due to labor, equipment costs, slow charging time, and lost payloads. The fact is that requiring ZE/NZE trucks at BIG would likely require customers to invest in BET charging infrastructure and to purchase new BETs, making BIG uncompetitive where other logistics providers institute no such mandates.

Additional Feasibility Constraints

There also remain significant limitations to BETs that make requiring BETs at BIG operationally infeasible.

Battery and Charging Limitations

The current range of BETs makes roundtrips to and from BIG on a single charge highly unlikely, especially given the mountainous terrain of the Cajon Pass. Some commercially available BET ranges include:

- Volvo VNR Electric: 275 miles per charge (with "typical" operations allowing 220 miles per charge)[39]
- DAF XD Battery Electric: between 150 and 310 miles per charge[40]
- Freightliner eCascadia and Freightliner eM2: 230 miles per charge[41] for regional distribution

Conclusion

Imposing ZE/NZE requirements would impair BIG's ability to reduce regional truck trips by making it economically unviable for its customers. Regional truck trips would continue, as they do today, to one of BNSF's other IMFs in San Bernardino or Los Angeles, eliminating one of the emissions benefits of BIG. An industry-level issue—such as adoption of a brand-new technology to reduce drayage truck emissions and modify goods movement—requires an industry-wide regulation and solution, not a requirement that

[39] *Volvo. VNR Electric.* Accessed March 2026 at https://www.volvotrucks.us/trucks/vnr-electric/ .

[40] *DAF. New Generation DAF XD Electric.* Accessed March 2026 at https://www.daf.global/en-us/trucks/daf-xd-electric?Page=1.

[41] *Freightliner. Freightliner eCascadia Specs.* Accessed March 2026 at https://www.freightliner.com/trucks/ecascadia/specifications/#tab-5.

singles out one project. Such limits on truck trips accessing BIG would substantially impair BIG's market viability. See *Impacts on BIG's Viability Due to Additional Suggested Zero-Emission Mitigation Measures*, Brad Womack (BNSF), April 2026).

Consolidated Response 05-07: Use of Performance Standards

Certain comments assert that the DEIR includes improperly deferred mitigation. As described below, the Draft EIR complies with CEQA requirements for the use of performance standards in mitigation measures to avoid any issue with improper deferral.

CEQA requires that an EIR identify ways in which significant environmental impacts can be lessened in severity or avoided, including by the adoption of feasible and effective mitigation measures (State CEQA Guidelines § 15126.4). To this end, mitigation measures must reduce the severity of potentially significant impacts, their effectiveness must be clear, and they must be enforceable (State CEQA Guidelines § 15126.4(a)). Although formulation of mitigation measures cannot be deferred until some future time, State CEQA Guidelines § 15126.4(a)(1)(B) provides that the "specific details of a mitigation measure, however, may be developed after project approval when it is impractical or infeasible to include those details during the project's environmental review, provided that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard that will be considered, analyzed, and potentially incorporated in the mitigation measure."

Reasons why additional details of mitigation measures would be provided in the future include that actual magnitude of the impact, while estimated in the Draft EIR, will depend on the pace of Project build-out or other factors that are not known at this time. Another reason is that the effectiveness of various mitigation strategies is likely to change over time, and thus flexibility is required to ensure that strategies can adapt and be refined as long as a performance standard is met. As explained in *Golden Door Properties v. County of San Diego* (2020) 50 Cal.App.5th 467 and similar cases, if an EIR includes a mitigation measure that allows for final details of proposed mitigation to be further refined, the EIR should include the following information as evidence that (1) it was necessary to defer final articulation of the measure's features, and (2) the proposed mitigation will serve to effectively mitigate the identified effect:

- An explanation of why proposed future studies cannot be provided at the current time.
- Realistic performance standards or criteria that will ensure that the measure will be effective in mitigating the significant effect.
- A list of specific contents, standards, or alternative actions to be included in the future plan.
- An explanation or analysis of the effectiveness and feasibility of the measure and its potential for success in reducing or avoiding the identified impact.
- Commitment that the project proponent will complete the proposed studies/plan and implement actions to achieve the performance standard.

    (C) A requirement that advancement of future site-specific project approvals will be contingent on ensuring that those components of the project meet the performance criteria.

As described in these Responses, the Draft EIR fully complies with requirements for mitigation, as provided in State CEQA Guidelines and confirmed in recent cases, by providing mitigation measures that either require very specific action or actions with predictable results, or include clear performance standards (i.e., required results) that would be accomplished through a mix of required measures and, in some cases, a menu of additional measures that are outlined in the mitigation measure.

Some comments also incorrectly assert that mitigation measures are improperly deferred until other public agencies provide or approve future plans, reports, findings, or permits. This is not the case. The EIR describes and analyzes the extent of the impact and whether the impact is significant based on applicable thresholds. Where mitigation measures mention other agencies, it is to describe the agency's regulatory role or the need to consult with them during implementation of the measure.

The Draft EIR contains performance standards for certain mitigation measures. Most performance standards used in the Draft EIR mitigation measures are quantitative. However, there is no requirement under CEQA that all mitigation measures have quantitative performance standards, especially where the impacts are qualitative. Mitigation measures in the Draft EIR that contain performance standards also contain a list of required actions, a menu of other specific actions that may be used to supplement the required actions, and a process for ensuring that the performance standard is met. This type of "menu" approach to a mitigation measure is not "deferred" because the specific actions are identified that can be combined and reasonably calculated to meet the performance standard. The identification of a range of actions to address such impacts is the proper approach under CEQA to provide dynamic and event-specific mitigation.

CONSOLIDATED RESPONSE 06: POTENTIAL EFFECTS ON COMMUNITIES

This Consolidated Response addresses the various comments raised about BIG's potential effects on nearby communities. As discussed below, the Draft EIR properly analyzed BIG's significant environmental impacts on the relevant geographic scope, based on substantial evidence. Furthermore, socio-economic impacts are generally not required to be analyzed under CEQA.

Consolidated Response 06-01: Geographic Scope

Some comments assert that the Draft EIR did not, or did not sufficiently, address BIG's potential effects on a particular community. Consistent with CEQA requirements, the Draft EIR accurately describes the environmental setting and fully analyzes the proposed Project's potential impacts.

Concerning the geographic scope of analysis, CEQA does not require that an EIR specifically analyze impacts to any community in particular. Rather, State CEQA Guidelines § 15125(a) states that "[a]n EIR must include a description of the physical environmental conditions in the vicinity of the project" and that "[t]he description of the environmental setting shall be no longer than is necessary to provide an understanding of the significant effects of the proposed project and its alternatives." The setting and detail required depends on the impacts analyzed.

Consistent with this, each Draft EIR section includes a "Definition of Study Area," which is the geographic boundary in which the environmental investigations were conducted specific to each environmental topic. This geographic boundary, or setting, may include whole or parts of certain communities depending upon

the impacts analyzed, as supported by substantial evidence. This approach is consistent with CEQA's requirements and adequately analyzes BIG's impacts.

Consolidated Response 06-02: Socio-Economic Impacts

Some comments assert that the Draft EIR did not address BIG's potential effects on community safety, quality of life, property values, and other socioeconomic impacts. Although CEQA generally does not require the analysis of these issues, this Consolidated Response discusses the role of social and economic issues under CEQA, and how such issues are addressed in the Draft EIR concerning BIG and these communities.

State CEQA Guidelines § 15131 allows the approving agency to include or present economic or social information in an EIR, but State CEQA Guidelines § 15131(a) limits the consideration of such factors in the assessment of significant impacts, stating:

> *"Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes."*

State CEQA Guidelines § 15064(e) notes that an economic or social change by itself would not be considered a significant effect on the environment. Economic and social changes are only considered under CEQA to the extent that they may lead to adverse physical impacts on the environment, such as the construction of replacement housing necessitated by the displacement of substantial numbers of people.

In analyzing the environmental impacts of a project, an EIR must evaluate both direct and indirect physical effects of a project. Direct effects are effects that are caused by a project and occur at the same time and place. An indirect environmental effect is a change in the physical environment that is not immediately related to a project, but that is caused indirectly by a project. CEQA does not require the analysis of generalized social and economic effects, such as quality of life and property values, as suggested by many of the comments. A lead agency is also not required to analyze conclusory statements regarding social and economic impacts that are not supported by substantial evidence in the record.

According to State CEQA Guidelines § 15064(d) and 15064(e), a CEQA document must consider the reasonably foreseeable environmental consequences of physical changes resulting from a project's economic or social changes. That is, social and economic effects are only relevant under CEQA if they would result in, or are caused by, an adverse physical impact to the environment. Based on the State CEQA Guidelines and CEQA requirements, this EIR generally does not address the Project's economic effects or social changes that have no reasonably foreseeable effect on the physical environment.

However, the Draft EIR evaluates the potential impacts associated with displacement under **Draft EIR Section 5.13: Population and Housing. Draft EIR Impact 5.13-2** (beginning page 5.13-48), which addresses BIG's potential to displace substantial numbers of existing people or housing and relocation requirements. BIG requires property acquisitions of residential and non-residential uses to accommodate the proposed

improvements/modifications. BNSF is acquiring property through both voluntary transactions and condemnation proceedings. As indicated on Draft EIR page 5.13-47, BIG would displace approximately 108 housing units and approximately 93,724 square feet of non-residential (commercial and industrial) land uses; see also **Draft EIR Table 5.13-11** (page 5.13-28) and **Draft EIR Table 5.13-18** (page 5.13-38). None of the acquired land uses are located within the Silver Lakes/Helendale Community or the Sylvan Community. For any property acquired through condemnation, under the California Relocation Assistance Law (Government Code §§ 7260.5[b], 7262), BNSF is required to provide fair and equitable treatment relocation assistance to property owners displaced as a result of condemnation. The law aims to minimize the hardship of displacement on these persons. Relocation expense payments are in addition to the condemnation compensation for the value of the acquired property, to the extent that items are not included within other portions of the condemnation award, per Government Code § 7270 and § 7272.5. As such, the displaced land uses have or will receive relocation expense payments/compensation for the acquired property, in accordance with regulatory requirements.

The Draft EIR, including the **Section 3.0 Project Description**, the Project Context (Chapter 4), the Fiscal Impact Analysis for LAFCO Action Area A, and the draft proposed CEQA Findings of Facts and Statement of Overriding Considerations also discuss, in detail, the anticipated positive economic impact of the General Plan Update and the BIG Project.

Consolidated Response 06-03: Community Safety

Some comments raised concerns about BIG's potential effects on community safety. "Community safety" is a very broad and subjective term, encompassing different factors and based on an individual's opinion/perception. For some, community safety may involve crime/violence prevention and adequate infrastructure (i.e., streets, sidewalks, stormwater), while for others it may involve prevention of hazards and availability of public services. Only general comments concerning community safety were offered in the comment letters. As noted, CEQA requires that an EIR analyze a project's significant environmental effects (i.e., the potential direct, indirect, and cumulative physical changes to the environment). As such, some of the factors typically associated with community safety are not subject to review under CEQA. However, the Draft EIR, which follows State CEQA Guidelines Appendix G, does include analysis of some environmental topics that address community safety-related factors, although "community safety" is not specifically identified. The environmental topics involving safety-related factors that are analyzed in the Draft EIR are found under the "Impact Thresholds and Significance Criteria" subsections, and the corresponding environmental analyses of BIG's potential impacts are found in the "Project Impacts and Mitigation Measures" subsections of the following Draft EIR Sections:

- **5.7: Geology, Soils, and Mineral Resources** (see Draft EIR beginning page 5.7-43);
- **5.9: Hazards, Hazardous Materials, and Wildfire** (see Draft EIR beginning page 5.9-99);
- **5.10: Hydrology and Water Quality** (see Draft EIR beginning page 5.10-50);
- **5.14: Public Services and Recreation** (see Draft EIR beginning page 5.14-47); and
- **5.15: Transportation** (see Draft EIR beginning page 5.15-57).

Comments concerning community safety impacts, such as delays in emergency response time or adequacy of emergency access, are addressed below in **Consolidated Response 08**. Comments concerning particular

community safety impacts (i.e., the Silver Lakes/Helendale Community), such as the adequacy of emergency access or delays in emergency response time, are addressed in **Consolidated Responses 10-01, 10-02**, and **10-03**. Further, as discussed in **Draft EIR Section 3.0: Project Description, Draft EIR Section 4.0: Project Context**, the Fiscal Impact Analysis for LAFCO Action Area A, and the draft, proposed CEQA Findings of Facts and Statement of Overriding Considerations, the City and Barstow Fire Protection District anticipate the property tax revenues from BIG paying for nine (9) new police officers, twelve (12) new firefighters, and a ladder fire truck. (Staff Report Attachment D LAFCO Action Area A Fiscal Impact Analysis.) These new police officers and firefighters would provide a significant economic and social benefit by boosting the community's public safety services and presence.

Consolidated Response 06-04: Quality of Life

Some comments raised concerns about BIG's effects on quality of life issues, such as the "ability to live outdoors," "ability to raise livestock" and "ability to remain in our homes." As previously noted, CEQA requires that an EIR analyze a project's significant environmental effects (i.e., the potential direct, indirect, and cumulative physical changes to the environment). Quality of life is not an environmental topic addressed under CEQA. However, the Draft EIR does include analysis of some environmental topics that address quality of life (e.g., aesthetics, air quality, noise, public services, recreation, etc.), although "quality of life" is not specifically identified. The quality of life-related factors that are analyzed in the Draft EIR are found under the "Impact Thresholds and Significance Criteria" subsections, and the corresponding environmental analyses are found in the "Project Impacts and Mitigation Measures" subsections of **Draft EIR Sections 5.1** through **5.17**.

The "ability to live outdoors" and the "ability to remain in our homes" are very broad and subjective statements, encompassing different factors and based on an individual's opinion/perception. For some, ability to live outdoors may involve weather and recreational activities, while for others it may involve air quality and noise. No specifics concerning the ability to live outdoors were offered in the comments. Notwithstanding, the Draft EIR analyzes exterior air quality, as well as interior and exterior noise levels. **Draft EIR Section 5.3** analyzes BIG's potential impacts on exterior air quality (Draft EIR beginning page 5.3-76). **Draft EIR Appendix 5.3 BIG-1: Air Quality Technical Report** describes, in detail, the methodology for determining BIG's air quality impacts. Additionally, **Draft EIR Section 5.12** analyzes BIG's potential impacts on interior and exterior noise levels (Draft EIR beginning page 5.12-65). Exterior noise levels were analyzed at the nearest sensitive receptor property line. Additionally, interior noise levels were calculated to evaluate the potential for sleep disturbance under two conditions: "windows closed" and "windows open" (Draft EIR page 5.12-36). The calculated interior noise levels were analyzed in combination with the FICAN Sleep Disturbance Curve to predict the likelihood of sleep awakenings during BIG operations. Additionally, the Draft EIR analyzes the effects of noise on humans, which can range from temporary or permanent hearing loss to mild stress and annoyance due to such things as speech interference and sleep deprivation (Draft EIR page 5.12-51). **Draft EIR Appendix 5.12 BIG-1 Noise and Vibration Technical Report** describes, in detail, the methodology for determining BIG's noise impacts.

Like the ability to live outdoors (see **Consolidated Response 06-04**), the "ability to raise livestock" is a very broad and subjective statement, encompassing different factors and based on an individual's opinion/perception. No specifics concerning the ability to raise livestock were offered in the comments. See the preceding discussions concerning outdoor spaces and BIG's potential air quality and noise impacts

on humans, which are presumed to affect animals similarly. BIG's implementation would not interfere with the surrounding communities' ability to raise livestock, which would continue to be subject to County Code and Barstow Code standards concerning livestock.

Consolidated Response 06-05: Decreased Property Values

CEQA requires that an EIR analyze a project's significant environmental effects (i.e., the potential direct, indirect, and cumulative physical changes to the environment). CEQA does not directly require analysis of property value impacts, as CEQA focuses on physical environmental effects, with economic or social changes like decreased property values not considered significant by themselves, unless they are tied to a physical impact. While CEQA analyses can indirectly influence property values through disclosure and mitigation requirements, property value loss alone is a socioeconomic effect, not a physical one, thus is not subject to review under CEQA.

CONSOLIDATED RESPONSE 07: POTENTIAL IMPACTS CONCERNING HAZARDOUS MATERIALS

Some comments assert that the Draft EIR did not analyze providing a disaster response plan to address potential spills, derailments, and other emergencies. The Draft EIR includes analysis of environmental topics that address potential spills, derailments, and other emergency factors and found in **Draft EIR Section 5.9: Hazards and Wildfire** under the "Impact Thresholds and Significance Criteria" subsections.

- **Impact 5.9-1**: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
- **Impact 5.9-2**: 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.
- **Impact 5.9-6**: Impair implementation of or physically interfere within an adopted emergency response plan or emergency evacuation plan.

Based on these environmental topics, CEQA requires analysis of a project's impacts and identification of laws and regulations to minimize a project's impacts. When an impact would still occur despite compliance with laws and regulations, mitigation is incorporated to minimize the impact to less than significant. Concerning potential spills, derailments, and other emergencies, the analysis found (Draft EIR pages 5.9-101 to 5.9-105 and pages 5.9-115 to 5.9-119) that compliance with several federal, State, and local laws and regulations would be effective in preventing a hazard through the routine transport, use, or disposal of hazardous materials and through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment to the public and the environment.

Further, BNSF has prepared a System Emergency Response Plan to respond to emergencies within their rail network, which includes BIG. The Response Plan describes procedures for responding to hazardous release emergencies, persons, and agencies to contact, locations for personnel to evacuate to, and prevention practices to limit the potential of these emergencies. Despite compliance with the U.S. EPA, USDOT, California Division of Occupational Safety and Health, BFPD, and BNSF policies, there is risk of a passenger or freight train derailing on the trackway, releasing hazardous materials into the environment

and creating a significant hazard to the public or the environment. Train derailments in the U.S. occur for several reasons, although generally they occur because of track and special trackwork not being adequately maintained for the trains' operational speed, mechanical and equipment failures, train handling, and human error. BNSF regularly inspects all the components of the network, including locomotives, track, rail, and bridges. These comprehensive inspections meet all federal requirements. Trained BNSF inspectors utilize advanced equipment such as instrument-equipped rail cars, bridge inspection vehicles and unmanned aerial vehicles (UAVs) and deploy technology such as Machine Vision Systems (MVS), autonomous track measurement systems, ultrasound, ground-penetrating radar and high-definition cameras and accelerometers. These efforts, coupled with the use of specialized rail cars to carry hazardous materials and waste (HMW), mobile apps to equip first responders with critical safety information, and a software system to determine the safest rail routes all help ensure that more than 99.99 percent of all HMW moved by all rail carriers reach its destination without a release caused by a train accident.

Concerning other emergencies, the analysis found (Draft EIR pages 5.9-129 to 5.19-30) that through compliance with federal, State, and local laws and regulations, BIG would not impair implementation of or physically interfere within an adopted emergency response plan or emergency evacuation plan within the study area.

CONSOLIDATED RESPONSE 08: INCREASED RAIL ACTIVITY'S EFFECTS CONCERNING DELAY AT AT-GRADE CROSSINGS

This response addresses the increased rail activity's effects during BIG operations concerning delay at at-grade crossings, including general traffic delays (e.g., vehicular movement of residents, workers, etc.) and delays in emergency response (i.e., paramedics/ambulances, fire protection, and police protection).

Consolidated Response 08-01: Increased Rail Activity's Effects Concerning Traffic Delay

Some comments expressed concerns about increased vehicle delay at at-grade rail crossings along the BNSF rail corridor due to the proposed increase in rail activity from BIG. As discussed on Draft EIR page 5.15-3, Senate Bill 743 created a shift in transportation impact analysis under CEQA from a focus on automobile delay, as measured by level of service (LOS) and similar metrics, toward a focus on reducing vehicle miles traveled (VMT) and greenhouse gas (GHG) emissions. The State proposed new criteria for determining the significance of transportation impacts. The statute states that automobile delay, as described solely by level of service (LOS) or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment under CEQA, except in limited circumstances, not applicable here, that are specifically identified in the new criteria. As such, the increased rail activity's effects concerning traffic delay at at-grade crossings are not considered a significant impact on the environment under CEQA.

Some comments note that delays currently occur at the at-grade crossings along BNSF's rail corridor, which connects the Ports of Los Angeles and Long Beach to BIG. These existing conditions are acknowledged. However, pursuant to CEQA, the purpose of environmental review is to evaluate whether a proposed project would result in a significant environmental impact by comparing project-related conditions to the existing environmental baseline, not to remedy or mitigate pre-existing conditions. CEQA

does not require a project to correct existing conditions (e.g., existing traffic delays) unless it is an impact under CEQA and caused or exacerbated by the project. As previously noted, the increased rail activity's effects concerning traffic delay at at-grade crossings are not considered a significant impact on the environment under CEQA.

Notwithstanding, the effects of BIG's increased rail activity concerning traffic delays at a representative sample (i.e., nine at-grade crossings of the 48 total public at-grade crossings along BNSF's rail corridor, which connects the Ports of Los Angeles and Long Beach to BIG) have been analyzed in the Analysis of At-Grade Crossing Delay for BIG (At-Grade Crossing Evaluation).

As noted in the At-Grade Crossing Evaluation, under Plus BIG conditions, BIG would add approximately three to five trains per day, for a total increase in gate down time of approximately 8 to 22 minutes per day at each of the nine at-grade crossings studied. This equates to an average increase of less than 1 minute of gate down time per hour. The average delay per vehicle during a 24-hour period is estimated to increase by less than 3 seconds per vehicle at all nine crossings, compared to No BIG Baseline conditions. Further, all nine crossings are forecast to have an average delay per vehicle over a 24-hour period under 35 seconds (LOS C or better) under Plus BIG conditions. See Response L-17 concerning emissions from vehicle idling.

Consolidated Response 08-02: Increased Rail Activity's Effects Concerning Traffic Queue Lengths

Some comments expressed concerns about existing and increased vehicle queues at at-grade rail crossings along the BNSF rail corridor due to the proposed increase in rail activity from BIG. These existing conditions are acknowledged. However, pursuant to CEQA, the purpose of environmental review is to evaluate whether a proposed project would result in a significant environmental impact by comparing project-related conditions to the existing environmental baseline, not to remedy or mitigate pre-existing conditions. CEQA does not require a project to correct existing conditions (e.g., existing traffic delays or queuing) unless it is an impact under CEQA and caused or exacerbated by the project.[42] As previously noted, the increased rail activity's effects concerning traffic delay at at-grade crossings are not considered a significant impact on the environment under CEQA.

Nevertheless, the effects of BIG's increased rail activity concerning vehicle queues at nine at-grade railroad crossings have been analyzed in the At-Grade Crossing Evaluation. As noted in the At-Grade Crossing Evaluation, queue length is affected by train length, train speed, gate closing time, gate opening time, roadway geometry, and roadway vehicle volume.

BNSF train length, train speed, gate closing time, gate opening time, and at-grade crossing roadway geometry are forecast to be similar under existing, No BIG Baseline, and Plus BIG conditions. Although it is recognized that some increase in train length could occur in practice, this assumption is reasonable given existing operational, infrastructure, and regulatory constraints that limit maximum train lengths. Moreover, freight rail operators generally seek to optimize train length under existing conditions to maximize operational efficiency.

[42] *See In re Bay-Delta Programmatic Envtl. Impact Report Coordinated Proceedings* (2008) 43 Cal.4th 1143, 1167.

Operating speeds are established by the railroad based on track geometry, including horizontal curvature, vertical grade, superelevation, and sight distance, as well as track class, signal system characteristics, and applicable Federal Railroad Administration (FRA) safety requirements. These factors define the maximum allowable and typical operating speeds for each subdivision and segment of track. Because BIG does not propose modifications to track alignment, geometry, or signal systems within the At-Grade Crossing Evaluation area, there is no basis to assume a change in typical train operating speeds under future conditions.

Likewise, BIG does not propose changes to gate closing time, gate opening time, or at-grade crossing roadway geometry outside the BIG footprint.

BIG operations would not affect vehicular traffic volumes on roadways outside of the study areas identified in the **Draft EIR Appendix 5.15 BIG-2: Level of Service Assessment – Transportation Analysis**. Independent of BIG operations, vehicle volumes are estimated to increase at a rate of 1.5% per year to account for background population and employment growth over time.

Therefore, traffic queue length during BNSF rail activity is forecast to be similar under the No BIG Baseline and Plus BIG conditions in any given year. Changes in queue length are expected to result primarily from changes in background vehicle traffic volumes.

The frequency of queue formation is expected to increase proportionally to the increase in daily train volumes (approximately 3-4 trains per day in 2028 and 5 trains per day in 2048). This increase in daily train volumes represents an increase of approximately 5% over the No BIG Baseline.

Further, as noted in **Draft EIR Section 5.15.6**, the threshold regarding transportation hazards is: Impact 5.15-3: Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (page 5.15-69). Therefore, increased queue frequency is not considered a transportation safety impact under CEQA. As noted on page 5.15-70, BIG would not substantially increase hazards due to geometric design features or incompatible uses.

Consolidated Response 08-03: Increased Rail Activity's Effects Concerning Delays in Emergency Response

Some comments expressed concerns about increased emergency vehicle delay at at-grade rail crossings along the BNSF rail corridor due to the proposed increase in rail activity from BIG.

As discussed in **Draft EIR Impact 5.14-1** (page 5.14-44) and **Draft EIR Impact 5.14-2** (page 5.14-52), CEQA requires analysis of emergency response times only to the extent that a project's potential effects on response times would result in or require construction of new or physically altered fire or police protection facilities, and such construction would cause significant environmental impacts. Therefore, based on State CEQA Guidelines Appendix G, the Draft EIR includes analysis of the following environmental topics, which include emergency response time-related factors and are found in **Draft EIR Section 5.14: Public Services and Recreation**:

- **Impact 5.14-1**: Result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, need for new or physically altered fire protection

facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services.

- **Impact 5.14-2:** Result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services.

As noted in **Consolidated Response 08-01**, the effects of BIG's increased rail activity concerning traffic delays at nine at-grade railroad crossings were analyzed in the At-Grade Crossing Evaluation. This evaluation addresses potential effects at existing at grade crossings along the rail corridor between the Ports and BIG (outside the BIG footprint). This evaluation does not pertain to the proposed Hinkley Road vacation, which is located within the BIG footprint and is addressed separately in the Draft EIR, including analysis of emergency access.

Outside the BIG footprint, BIG does not propose any at grade crossing closures or roadway vacations. Therefore, existing emergency vehicle access routes across the rail corridor would be preserved. While increased rail activity may result in increased delays when trains are present, emergency vehicles would continue to have physical access across all existing crossings. Therefore, BIG would not result in inadequate emergency access.

As noted in the At-Grade Crossing Evaluation and Draft EIR, BIG proposes to add approximately 3-4 trains per day in Opening Year 2028 and 5 trains per day in Horizon Year 2048 over No BIG Baseline conditions. With this increase, BIG would add approximately 8 to 22 minutes of gate down time per day at each of the nine at-grade crossings studied. This equates to an average increase of less than 1 minute of gate down time per hour. The average delay per vehicle during a 24-hour period is estimated to increase by less than 3 seconds per vehicle at all nine crossings, compared to No BIG Baseline conditions. Further, all nine crossings are forecast to have an average delay per vehicle under 35 seconds (LOS C or better) under Plus BIG conditions. As such, it can be inferred that emergency vehicles would experience similar delay increases as other vehicles at the studied at-grade crossings.

As discussed in **Consolidated Response 08-01**, delay, in and of itself, is not considered a significant impact on the environment under CEQA. CEQA requires analysis of emergency response times only to the extent that a project's effects would result in or require construction of new or physically altered fire or police protection facilities that could cause significant environmental impacts. The increase in delay in emergency response times under with-BIG conditions is not expected to result in or require such construction. As previously noted, the average delay per vehicle (including emergency vehicles) during a 24-hour period is estimated to increase by less than 3 seconds per vehicle at all nine crossings. BIG's increase in delay is considered minimal and would not result in or require construction of new or physically altered fire or police protection facilities; therefore, BIG would result in a less than significant impact in this regard.

CONSOLIDATED RESPONSE 09: BIG'S POTENTIAL EFFECTS ON THE SYLVAN COMMUNITY

Some comments raised concerns about BIG's specific effects on the Sylvan Community. For purposes of this discussion, the Sylvan Community is comprised of the residences located south of Main Street and generally near/along Amarylis and Sylvan Avenues. As discussed in more detail below, these comments raise both CEQA and non-CEQA issues. Consistent with CEQA requirements, the Draft EIR describes existing conditions and fully analyzes the proposed Project's potential impacts, including on the Sylvan Community. See also **Consolidated Response 06** concerning BIG's potential effects on communities.

Consolidated Response 09-01: Consideration of the Sylvan Community in the Draft EIR and as a Sensitive Receptor

Comments have been received asserting that the Draft EIR has omitted the Sylvan Community from its analysis and has not considered it as a sensitive receptor. As explained below, and in detail in the DEIR, the Sylvan Community was considered, including several of its constituent residences as specifically analyzed as potentially sensitive receptors for potential noise and vibration, air quality, and lighting impacts. As noted above, CEQA does not require that an EIR specifically analyze impacts to any community in particular; see **Consolidated Response 06-01**. However, beyond CEQA's minimum requirements, the EIR as a whole, and specifically **Draft EIR Sections 5.1** through **5.17**, consider Sylvan Community sensitive receptors/single-family residences. The sensitive receptors identified in the Draft EIR have been analyzed as a worst-case representation of BIG's effects, including in the Sylvan Community. The Draft EIR considers the Sylvan Community's sensitive receptors/potentially affected single-family residences when they are within the study areas identified for each resource topic. **Draft EIR Sections 5.1** through **5.17** each include a "Definition of Study Area," which is the geographic boundary in which the environmental investigations were conducted specific to each environmental topic. Because the northernmost Sylvan Community residence is located approximately 300 feet south of the BIG Specific Plan area/Main Street, the Sylvan Community is included within many of the identified study areas. For example, **Consolidated Responses 09-02, 09-03**, and **09-05** concerning noise and vibration, air quality, and lighting, respectively, address the Sylvan Community sensitive receptors that are within the respective study areas, but identify these as single-family residences and not the Sylvan Community as a whole. Therefore, the Sylvan Community was not omitted from the Draft EIR's analysis and was considered as a sensitive receptor, where appropriate.

Consolidated Response 09-02: Consideration of Sylvan Community in the Noise and Vibration Analyses.

Some comments assert the Draft EIR has omitted the Sylvan Community from its noise and vibration analyses. As explained below, the Draft EIR specifically analyzes identified potentially sensitive receptors within the Sylvan Community. The environmental topics relevant to the factors raised in the comments (e.g., noise and vibration) are found under the "Impact Thresholds and Significance Criteria" subsections, and the corresponding environmental analyses are found in the "Project Impacts and Mitigation Measures" subsections, in **Draft EIR Sections 5.1** through **5.17**.

As discussed in **Consolidated Response 06-04**, **Draft EIR Section 5.12** addresses noise and vibration. Interior and exterior noise levels were analyzed, and sleep disturbance and stress levels were considered. As discussed on Draft EIR page 5.12-15, the study area for impacts concerning noise and vibration includes the BIG footprint and nearby sensitive receptors. Sensitive land uses nearest to BIG are shown on **Draft EIR Figure 5.12-8** (page 5.12-53) and listed in **Draft EIR Table 5.12-22** (page 5.12-51). **Draft EIR Table 5.12-22** indicates that Sylvan Community single family residences are identified as "R3," which are Residential Receptors-Block Swap/Intermodal Receptor. These receptors are analyzed as a worst-case representation of BIG's noise levels in that area (i.e., Sylvan Community). BIG's potential impacts concerning noise and vibration are addressed under Impacts 5.12-1 and 5.12-2, respectively (beginning Draft EIR page 5.12-29). Also, see **Response O21-68** for additional discussion regarding health effects of noise and vibration disturbances on human health.

Construction Noise (Daytime). The noise levels calculated in **Draft EIR Table 5.12-28** (page 5.12-76) show BIG's highest estimated construction noise levels (by construction area) at the nearest sensitive receptors (residential uses). As indicated in **Table 5.12-28**, BIG daytime construction noise levels would reach a maximum of 84.2 dBA Leq(8-hour) during 33 kV Line construction and would exceed the FTA's 80 dBA Leq(8-hour) daytime construction noise standard for residential uses in only one construction area- the 33 kV line. Temporary noise barriers for construction of the 33 kV line would be considered infeasible mitigation, and a significant and unavoidable daytime construction noise impact would occur at the impacted receptors; see also **Consolidated Response 05** concerning feasible and enforceable mitigation. Review of **Table 5.12-28** indicates that R3, which considers the Sylvan Community, is not identified as an impacted receptor. As such, BIG's daytime construction noise levels at R3, which is a worst-case representation of BIG's noise levels in the Sylvan Community, would not exceed the daytime construction noise threshold, resulting in a less than significant impact.

Construction Noise (Nighttime). BIG would require approximately four weeks of nighttime construction for east and west lead track work adjacent to the mainline tracks where the lead tracks would tie into the mainline tracks. Also see **Response O21-72** for additional information concerning nighttime construction noise.

As indicated in **Table 5.12-28**, BIG nighttime construction noise levels associated with the east lead tracks, solar farm, Lenwood Channel improvements, and 33 kV line would exceed the FTA's 70 dBA Leq(8-hour) nighttime construction noise standard for residential uses. To mitigate nighttime construction noise, the Draft EIR includes **MM BIG NOI-1**, which would require preparation of a Construction Noise Logistics Plan that includes measures to reduce nighttime construction noise levels to 70 dBA Leq(8-hour). However, because the precise details regarding the proposed schedule, duration/hours, equipment type/quantity, and specific location of construction for nighttime construction activities are unknown at this time, it may not be possible for the measures required by **MM BIG NOI-1** to effectively reduce nighttime construction noise levels to the performance standard of the FTA's 70 dBA Leq(8-hour) for residential uses. Therefore, a significant and unavoidable nighttime construction noise impact would occur at the impacted receptors. Review of **Table 5.12-28** indicates that R3, which considers the Sylvan Community, is not identified as an impacted receptor. As such, BIG's nighttime construction noise levels at R3, which is a worst-case representation of BIG's noise levels in the Sylvan Community, would not exceed the nighttime construction noise threshold, resulting in a less than significant impact.

Operational Noise. BIG's Opening Year 2028 operational exterior noise levels are evaluated against the applicable City and County noise standards **in Draft EIR Table 5.12-29** (page 5.12-82) and the incremental noise analysis is provided in **Draft EIR Table 5.12-30** (page 5.12-83). Only receptors that would, under "with BIG" conditions, exceed either the absolute noise standard or the incremental noise increase thresholds are provided in these tables. Review of these tables indicates that R3, which considers the Sylvan Community, is not included (i.e., is not identified as an impacted receptor). As such, BIG's operational noise levels under 2028 conditions at R3, which is a worst-case representation of BIG's noise levels in the Sylvan Community, would not exceed the daytime or nighttime operational noise thresholds, resulting in a less than significant impact. Similarly, review of BIG's operational noise levels under Interim Year 2033 and Horizon Year 2048 also indicates R3 is not included in the relevant tables found later in **Draft EIR Section 5.12**. As such, BIG's operational noise levels under 2033 and 2048 conditions at R3 would not exceed the daytime or nighttime operational noise thresholds, resulting in a less than significant impact.

As previously noted, the Sylvan Community is within the vibration study area. BIG's potential impacts concerning vibration are discussed under **Draft EIR Impact 5.12-2** beginning on page 5.12-131. The analysis found that BIG's construction vibration levels would not exceed any applicable thresholds or standards, and a less than significant impact would occur. The Draft EIR also found that BIG's vibration levels from operational train pass-bys would not cause structural damage at off-site structures or create human annoyance. BIG's impacts would be less than significant.

Consolidated Response 09-03: Consideration of Sylvan Community in the Air Quality Analysis

Some comments assert that the Draft EIR did not, or did not sufficiently, address the Community's exposure to diesel particulate matter and health risks. As explained below, the Draft EIR specifically analyzes identified potentially sensitive receptors within the Sylvan Community as to potential air quality impacts. **Draft EIR Section 5.3** addresses air quality. As discussed on Draft EIR page 5.3-28, the study area for direct and indirect impacts concerning air quality is the BIG footprint, the Mojave Desert Air Basin (MDAB), and the South Coast Air Basin (SCAB) as a whole, which includes the Sylvan Community. Sensitive receptors analyzed are listed in **Draft EIR Table 5.3-14** (page 5.3-60) and depicted on **Draft EIR Figure 5.3-4** (page 5.3-62). As indicated in **Draft EIR Table 5.13-14**, Sylvan Community single-family residences along Gazana Street were identified as sensitive receptors "R6" and "R7" along Amarylis Avenue. These receptors are analyzed as a worst-case representation of the air quality in that area (i.e., Sylvan Community).

Sensitive receptors R4 to R7 were inadvertently excluded from **Draft EIR Figure 5.3-4** but were included in the air quality analysis; see **Final EIR Section 3.0: Errata to the Draft EIR** for corrected **Figure 5.3-4**. The revised **Draft EIR Figure 5.3-4** including R4 to R7 is provided following this Consolidated Response, and in **Final EIR Section 3.0: Errata to the Draft EIR.** It is noted because these sensitive receptors are identified in **Draft EIR Table 5.13-14** and analyzed in the Draft EIR, this revision merely makes an insignificant modification to the EIR, and recirculation is not required (State CEQA Guidelines § 15088.5(b).); see also **Consolidated Response 03** concerning recirculation.

Additionally, the Health Risk Assessment (HRA) modeled toxic air contaminant (TAC) concentrations and health effects at 6,093 locations (receptors) surrounding BIG (i.e., the locations of potential exposure for residents, off-site workers, and sensitive members of the public). Because MDAQMD does not provide guidance for dispersion modeling, the analysis uses South Coast AQMD's recommended receptor grid spacing of 50 meters over sensitive receptor locations; see **Draft EIR Figure 5.3-3** (page 5.3-45). As shown on **Draft EIR Figures 5.3-3** and **5.3-4**, the Sylvan Community was considered in the air quality analysis. The impact analyses conducted under **Draft EIR Impact 5.3-1** through **Impact 5.3-4** address outdoor air quality, and thus outdoor spaces are considered.

Potential impacts to sensitive receptors and health risk were analyzed under **Draft EIR Impact 5.3-3** (pages 5.3-124 to 5.3-161). Localized construction emissions (mitigated) are shown in **Draft EIR Table 5.3-29** (page 5.3-126). Construction emissions would be reduced but would still exceed the PM_{10} NAAQS (24-hour) threshold despite the implementation of mitigation. The analysis found that for BIG, unmitigated and mitigated construction health risks would exceed the 10 in one million incremental threshold at residential and worker receptors (see **Draft EIR Table 5.3-35** page 5.3-142), which is a potentially significant impact for construction concentrations. Unmitigated risk would be minimized with **MM BIG AQ-3** through **MM BIG AQ-6**, which would reduce construction exhaust emissions (i.e., DPM) by requiring Tier 4 offroad equipment, renewable diesel, newer model year on-road construction trucks, and the minimization of batch plant emissions. Construction carcinogenic risk would remain above the 10 in one million threshold despite the implementation of mitigation measures.

Relative to operational cancer risk, the analysis found that unmitigated and mitigated risk would exceed the 10 in one million incremental threshold at residential receptors (see **Draft EIR Table 5.3-36** page 5.3-142). **MM BIG AQ-8** through **MM BIG AQ-14**, which would reduce cancer causing emissions from BIG operations. Impacts would remain above MDAQMD's thresholds after mitigation is applied. Unmitigated and mitigated risk would exceed the 10 in one million incremental threshold at residential receptors during operations. However, the risk for student, worker, and park receptors would be less than significant.

A less than significant would occur for all localized corridor impacts. Mitigation Measures (MM) **MM BIG AQ-1** through **MM BIG AQ-14** were proposed to mitigate potential impacts to sensitive receptors; see Draft EIR page 5.3-161. Impacts would be significant and unavoidable despite incorporation of mitigation.

Consolidated Response 09-04: Consideration of Sylvan Community in the Hydrology and Water Quality Analyses

Some comments assert that the Draft EIR did not, or did not sufficiently, address potential surface and groundwater contamination in the Sylvan Community. As discussed below and in the DEIR in detail, the Project would not significantly impact the Sylvan Community's private water wells. **Draft EIR Section 5.10** addresses hydrology and water quality. As indicated in **Draft EIR Table 5.10-3** (page 5.10-15), the analyses consider resources within the study areas defined in **Draft EIR Table 5.10-3**. Review of **Draft EIR Table 5.10-3** and **Draft EIR Figure 5.10-1** (page 5.10-16) indicates the Sylvan Community is within the surface water resource study area. This includes the BIG footprint, plus 250-foot buffer, and downstream water resources that would receive runoff and sediment from BIG footprint. BIG's potential impacts concerning hydrology and water quality are addressed under **Draft EIR Impacts 5.10-1** through **5.10-8**

(beginning page 5.10-50). The analysis found that BIG would result in less than significant impacts concerning hydrology and water quality.

See **Consolidated Response 09-07** below for a discussion concerning potential impacts to Sylvan Community private water wells, and Consolidated Response 09-10 below for a discussion concerning arsenic and groundwater.

Consolidated Response 09-05: Consideration of Sylvan Community in the Lighting Analysis

Some comments assert that the Draft EIR did not, or did not sufficiently, address potential lighting impacts on the Sylvan Community. As explained below, the Draft EIR specifically analyzes identified potentially sensitive receptors within the Sylvan Community as to potential lighting impacts. **Draft EIR Section 5.1** addresses aesthetics. **Draft EIR Impact 5.1-4** (pages 5.1-65 to 5.1-75) addresses BIG's potential to create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. As stated on **Draft EIR page 5.1-65**, some nearby land uses, such as residential uses, are considered light-sensitive because occupants have expectations of minimal lighting during nighttime hours and may be subject to disturbance by bright light sources. The light-sensitive receptors near BIG are the rural residential uses interspersed to the south, east, and west of BIG's footprint. The light-sensitive receptors nearest the BIG footprint are single-family residential uses approximately 120 feet southeast of BIG. The northernmost Sylvan Community residence is located approximately 300 feet south of the BIG Specific Plan area/south of Main Street, thus was considered in the analysis. BIG's potential impacts concerning lighting are analyzed in **Draft EIR pages 5.1-65** to **5.1-79**. The analysis found that BIG has the potential to create a new source of substantial light or glare that would adversely affect receptors to the southeast (i.e., the Sylvan Community). The analysis found that BIG operations would cause substantial aesthetic degradation from the introduction of lighting to a minimally illuminated area.

Nighttime lighting is required during both construction and operations. BIG construction activities include nighttime activities, necessitating safety and security lighting. BIG construction sites would utilize lighting fixtures typical of construction sites such as light towers, night lights, and balloon lights. BIG construction sites would include the lighting necessary to ensure safety pursuant to OSHA minimum construction lighting requirements. **MM BIG AES-1** requires the preparation and implementation of a Construction Lighting and Screening Plan (CLSP) The CLSP would also identify methods used to ensure construction lighting is directional (aimed toward work areas and away from nearby sensitive receptors) and limited to sufficient wattage for safety and security. Construction lighting would be temporary and cease upon BIG completion. BIG operations also would introduce new light sources required for operations, maintenance, public safety, and security. BIG operational lighting would comply with the Specific Plan standards, and BIG's rail yard operational lighting levels would remain within BIG rail yard footprint. Therefore, BIG would create a new source of substantial light or glare that would adversely affect day or nighttime views in the area (including the Sylvan Community), and this impact would remain significant and unavoidable (Draft EIR page 5.1-75).

Consolidated Response 09-06: Consideration of Cumulative Impacts to the Sylvan Community

Some comments assert that the Draft EIR did not, or did not sufficiently, address cumulative impacts on the Sylvan Community. State CEQA Guidelines § 15355 defines cumulative impacts as two or more individual impacts that, when evaluated together, are considerable or which compound or increase other environmental impacts. Draft EIR Section 6.0 analyzes BIG's potential cumulative impacts. To determine BIG's potential cumulative impacts, the cumulative analysis relies upon a list of past, present, and probable future projects pursuant to State CEQA Guidelines § 15130(b)(1)(A). The past, present, and reasonably probable future projects identified by the County of San Bernardino and City of Barstow near the BIG footprint are listed in Draft EIR Table 6-1 (page 6-4) and depicted on **Draft EIR Figure 6-1** (page 6-7). Review of **Draft EIR Figure 6-1** indicates that none of the cumulative projects listed in Draft EIR Table 6-1 are located within the Sylvan Community. The Logistics Facility (Cumulative Project 1) is the cumulative project located closest to the Sylvan Community, with the Barstow Yard (Cumulative Project 2) and the Utility Scale Solar (Cumulative Project 6) being the next closest, located approximately 1.5 miles to the east and approximately 5.2 miles to the southeast, respectively. Therefore, cumulative impacts to the Sylvan Community were analyzed in the Draft EIR beginning on page 6-12.

Consolidated Response 09-07: Consideration of Impacts to Sylvan Community Private Water Wells

Some comments assert that the Draft EIR did not, or did not sufficiently, address impacts on the Sylvan Community's private water wells. As explained below, the Draft EIR specifically analyzes potential impacts to the Sylvan Community's existing private water wells; and further analyzes how the project would bring a new Golden State Water Company water line down Main Street and thereby allow the Sylvan Community to connect to potable water directly. **Draft EIR Sections 5.9: Hazards, Hazardous Materials, and Wildfire, 5.10: Hydrology and Water Quality, and 5.17: Utilities and Service Systems** consider BIG's potential impacts on private water wells as discussed below.

- **Hazardous Materials and Wastes Contamination, Draft EIR Section 5.9:** This section addresses hazardous materials. **Draft EIR Impact 5.9-1** (beginning page 5.9-99) analyzes BIG's potential to create a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials, and **Draft EIR Impact 5.9-2** (beginning page 5.9-108) analyzes BIG's potential to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident involving the release of hazardous materials into the environment. Past industrial, agricultural, illegal dumping, or commercial activities within the BIG footprint could have resulted in spills or leaks of hazardous materials to the ground, resulting in soil/groundwater contamination. BIG construction would involve demolition, dismantling, and removal of all on-site existing land uses and associated structures and infrastructure, as well as grading. Contamination from surface activity at the construction site, in the event of an accident or if unexpectedly encountered, can introduce contaminants into the aquifer, which could then impact nearby wells. With respect to the potential for groundwater contamination, groundwater is not expected to be encountered during construction (Draft EIR page 5.9-108). Other exposures could result from release of HMW caused by improper containment or decontamination

procedures and lack of containment during inclement weather, which could result in stormwater runoff and contamination percolation into the soil substrate. Percolation can introduce contaminants into the aquifer, which could then impact nearby wells. The analysis found (Draft EIR page 5.9-115) impacts would be less than significant following compliance with the established regulatory framework with mitigation incorporated.

- Water Quality Standards, Draft EIR Section 5.10: This section analyzes BIG's potential to violate water quality standards, decrease groundwater supply, and interfere with groundwater recharge, which could impact surrounding private water wells. As discussed under **Draft EIR Impact 5.10-1** (page 5.10-50), BIG's construction-related activities and construction equipment could generate surface contaminants/contribute to pollutant loading in stormwater runoff from the construction site. These contaminants/pollutants could enter the aquifers underlying the BIG footprint and thus the groundwaters. However, the analysis found (Draft EIR page 5.10-52) that following compliance with the established regulatory framework (e.g., NPDES and CGP requirements (i.e., implementation of a SWPPP with BMPs) and County Code and Barstow Code requirements), BIG construction would not violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface or groundwater quality during construction. As such, BIG construction activities are not anticipated to impact water wells in the Sylvan Community.
- **Water Supply, Draft EIR Section 5.17** discusses BIG's potential impacts to water supply and **Draft EIR Section 5.10** discusses BIG's potential impacts to groundwater supplies. As stated on Draft EIR page 5.17-76, BIG's highest yearly non-potable water demand for construction activities is estimated to total approximately 3,227 AF as identified in **Draft EIR Table 5.17-21** (page 5.17-76)**.** The non-potable water for BIG construction activities would be supplied from up to eight private groundwater wells, which would be within the adjudicated Mojave Basin Area (i.e., within the Centro Subarea). The Sylvan Community is also within the adjudicated Mojave Basin Area. Parties to the Basin's Judgment are assigned a variable Free Production Allowance (FPA), which is a percentage of the Mojave Basin Adjudication Base Annual Production (BAP) rights assigned annually to each producer based on the Watermaster's (MWA) recommendation. Hence, well water pumping to meet BIG's construction non-potable water demands would be subject to the Judgment's pumping limitations. Therefore, BIG's construction non-potable water demand would not result in lowered water levels at nearby wells, including Sylvan Community private wells. BIG would not have non-potable water demand during operations.

Consolidated Response 09-08: Consideration of Sylvan Community Biological Resources

Some comments assert that the Draft EIR did not, or did not sufficiently, address BIG's potential effects on Sylvan Community wildlife, habitats, and wildlife corridors. As noted in **Draft EIR page 5.4-12**, the study area for direct impacts concerning biological resources is the BIG footprint, and the study area for indirect impacts concerning biological resources is the BIG footprint plus a 1,000-foot buffer. Therefore, the Sylvan Community is included within the indirect study area for biological resources. **Draft EIR Impact 5.4-4** discusses potential impacts to migratory wildlife corridors. As discussed on **Draft EIR page 5.4-12**, the study area for indirect impacts concerning biological resources is the BIG footprint plus a 1,000-foot buffer, which includes the Sylvan Community. Identified wildlife corridors within this biological resources study area are shown on **Draft EIR Figure 5.4-1** (page 5.4-13), which depicts five potential wildlife

movement corridors, none of which traverse the Sylvan Community. Therefore, BIG would not impact a wildlife corridor within the Sylvan Community, as none are present in the area. **Draft EIR Impact 5.4-1, Impact 5.4-2,** and **Impact 5.4-3** also discuss BIG's potential impacts to biological resources (i.e., candidate, sensitive, or special status species, riparian habitat/other sensitive natural community, and wetlands), respectively. Concerning these thresholds, the analysis found BIG would result in less than significant impacts with mitigation incorporated.

Consolidated Response 09-09: Consideration of Sylvan Community Cultural Resources

Some comments assert that the Draft EIR did not, or did not sufficiently, address BIG's potential effects on the Route 66 cultural landscape. **Draft EIR Impact 5.5-1** (pages 5.5-38 to 5.5-50) addresses BIG's potential to cause a substantial adverse change in the significance of a historical resource (i.e., Route 66). Route 66 was identified as currently listed in the CRHR/ NRHP and, as such, qualifies as a "historical resource" under CEQA. The central and westernmost portions of Route 66 (i.e., those that would be closest to the Sylvan Community) have undergone physical upgrades over time and are not particularly recognizable as Route 66 due to lack of period-significant businesses, landmarks, or identification that connect the segment to the important events in history that make Route 66 significant. that the analysis found that BIG would not cause a substantial adverse change in the significance of Route 66 and a less than significant impact would occur in this regard.

Consolidated Response 09-10: Consideration of the Sylvan Community in the Hazardous Materials Analysis, including Arsenic Levels/Mobilization

Some comments assert that the Draft EIR did not, or did not sufficiently, address BIG's potential effects on the Community concerning hazards and arsenic levels and mobilization. The **Draft EIR Section 5.9** analyses consider the resources and conditions within the study areas depicted in **Draft EIR Figure 5.9-1** (page 5.9-41) to determine impacts concerning hazards, hazardous materials, and wildfire. **Draft EIR Figure 5.9-1** indicates the Sylvan Community is within applicable resource study areas. The specific study areas applied to each topic are summarized in **Draft EIR Table 5.9-4** (page 5.9-40). The Draft EIR identifies arsenic as being present within the study area- from both railroad ties and some herbicides (page 5.9-71) and naturally occurring arsenic (page 5.9-75). Based on soil data collected within the HMW study area, no exceedances of arsenic in soil were detected above 11 mg/kg. Arsenic levels in groundwater were also evaluated and were detected at four properties that exceeded the Regional Water Quality Control Board's (RWQCB) maximum contamination levels (MCL) (Draft EIR page 5.9-110). The Draft EIR discloses that construction at these properties would include soil disturbance, which could involve the release of hazardous materials into the environment. BIG would therefore incorporate MM BIG HAZ-2, which requires adherence to State RWQCB and regional CUPA guidelines for well abandonment if not used for future development or additional sampling and well-head treatment prior to any reuse associated with BIG. As a result of the necessary sampling and treatments, BIG would not contribute to the exceedance of MCLs for arsenic and would not worsen any existing conditions through the application of required regulatory measures in MM BIG HAZ-2.

Additionally, the Draft EIR identifies that BIG construction would include extensive earthwork which could result in reasonably foreseeable upset conditions resulting in the release of arsenic as fugitive dust. Therefore, BIG would implement MM BIG AQ-1, which requires daily watering of exposed soil and roads

to further prevent the release of fugitive dust containing arsenic during construction (Draft EIR page 5.9-109). With incorporation of MM BIG AQ-1, BIG construction would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials, including arsenic, into the environment.

Consolidated Response 09-11: Consideration of Alternatives to Minimize Impacts to the Sylvan Community

Some comments assert that the Draft EIR did not address alternatives to minimize impacts to sensitive receptors in the Sylvan Community.

Public Resources Code § 21002.1(a) establishes the need to address alternatives in an EIR by stating that in addition to determining a project's significant environmental impacts and indicating potential means of mitigating or avoiding those impacts, "the purpose of an environmental impact report is ... to identify alternatives to the project." State CEQA Guidelines § 15126.6(a) provides further direction on the definition of project alternatives, as follows:

> *"An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation."*

Draft EIR Section 8.0: Alternatives to the Proposed Project identifies and describes a reasonable range of potentially feasible alternatives to the proposed Project pursuant to the above regulatory requirements. The environmental analysis considered an expansive list of alternatives, including those which would minimize impacts to adjacent sensitive receptors in the Sylvan Community, specifically, the BIG Flipped Concept Alternative (beginning Draft EIR page 8-39) and the BIG Reduced Flipped Concept Alternative (beginning Draft EIR page 8-41), which would place the rail yard components further from receptors south of Main Street (e.g., Sylvan Community sensitive receptors). Additionally, as discussed in **Draft EIR Section 8.8: BIG Alternatives Considered But Rejected** (beginning Draft EIR page 8-30), six alternatives were considered but rejected, including the Off-Site Alternative, which evaluated four potential sites in place of the BIG site. The justification for certain BIG siting objectives, such as being sited along BNSF's mainline, are included in **Draft EIR Section 8.6: Criteria for Selecting Alternatives** (beginning Draft EIR page 8-20). A number of the alternatives considered met or partially met BIG's objectives. Therefore, the EIR has met its obligations under CEQA relative to Alternatives considered.

CONSOLIDATED RESPONSE 10: BIG'S POTENTIAL EFFECTS ON THE SILVER LAKES/HELENDALE COMMUNITY

Some comments raised concerns about the specific effects of BIG on the Silver Lakes/Helendale Community, located approximately 13 miles west of the City of Barstow. As discussed in more detail below, these comments raise both CEQA and non-CEQA issues. Because of the distance between the Silver

Lakes/Helendale Community and the City, the Community is not included in some of EIR's identified study areas. However, consistent with CEQA requirements, the Draft EIR describes existing conditions and fully analyzes the potentially significant environmental impacts of the proposed Project on the environment, including impacts on the environment potentially affecting the Silver Lakes/Helendale Community.

Consolidated Response 10-01: Accessibility Concerns near the Silver Lakes/Helendale Community

Some comments raised concerns about "accessibility" for the Silver Lakes/Helendale Community. This is a very broad and subjective term, encompassing different factors and based on an individual's opinion/perception. No specifics concerning accessibility were offered in the comment letters. Concerning accessibility impacts with respect to the Silver Lakes/Helendale Community, **Draft EIR Section 5.15: Transportation** includes analysis (Draft EIR pages 5.15-69 to 5.15-73) of the following issue, consistent with State CEQA Guidelines Appendix G, which is access-related:

- Impact 5.15-4: Would the Project result in inadequate emergency access?

Concerning BIG's potential emergency access impacts in the vicinity of the Silver Lakes/Helendale Community, the analysis found (Draft EIR page 5.15-73) that during BIG's operational phase, vacating the southern portion of Hinkley Road would remove direct access from Helendale Fire Station 4 (located at 27089 Helendale Road, Helendale) to the Hinkley Road area via Main Street. However, emergency access from Fire Station 56 (located at 37284 Flower Road, Hinkley) and Fire Station 4 to the Hinkley Road area would be provided during BIG's operational phase, and emergency response assistance could be provided (e.g., from Fire Station 366 and other jurisdiction resources) when needed through mutual aid agreements. Also, as discussed in **Draft EIR Impact 5.14-1** (beginning page 5.14-43), one reestablished and two new fire stations would be required to maintain acceptable performance objectives for fire protection services to meet future needs under the proposed General Plan. Therefore, BIG's impacts concerning emergency access to the Hinkley Road area during the operational phase would be less than significant.

Helendale Fire Station 4 is located within and serves the Silver Lakes/Helendale Community. The Community has adopted an annual tax assessment to fund paramedics. The Community has expressed concern that BIG would be an added burden on their paramedic service. The analysis found (Draft EIR page 5.14-50) that BIG operations would increase the demand for fire protection and emergency medical services and equipment/infrastructure within the BFPD and SBC Fire service areas. As concluded in the proposed General Plan analysis (see Impact 5.14-1: General Plan Draft EIR pages 5.14-43 to 5.14-47), the anticipated growth under the proposed General Plan (including BIG) would require five BFPD fire stations (two existing; one re-established; and two new). Therefore, BIG would be served primarily by these five BFPD facilities. BIG would not be served from Station 4, aside from mutual aid and automatic aid agreements (Draft EIR page 5.14-22).

As noted in **Consolidated Response 08-01**, the effects of BIG's increased rail activity concerning traffic delays at nine at-grade railroad crossings, including Vista Road in Helendale, were analyzed in the At-Grade Crossing Evaluation. As noted in the At-Grade Crossing Evaluation, under Plus BIG conditions, BIG would add approximately three to five trains per day, for a total increase in gate down time of approximately 10 to 13 minutes per day at the Vista Road at-grade crossing. This equates to an average

increase of about 30 seconds of gate down time per hour. The average delay per vehicle during a 24-hour period is estimated to increase by less than 1 second per vehicle, compared to No BIG Baseline conditions. Further, the crossing is forecast to have an average delay per vehicle under 20 seconds (LOS B or better) under Plus BIG conditions.

Consolidated Response 10-02: Increased Rail Activity's Effects Concerning Traffic Delays at the Silver Lakes/Helendale Community At-Grade Crossings

As noted in **Consolidated Response 08-01**, the effects of BIG's increased rail activity concerning traffic delays at nine at-grade railroad crossings, including Vista Road in Helendale, were analyzed in the At-Grade Crossing Evaluation. As noted in the At-Grade Crossing Evaluation, under Plus BIG conditions, BIG would add approximately three to five trains per day, for a total increase in gate down time of approximately 10 to 13 minutes per day at the Vista Road crossing. This equates to an average increase of about 30 seconds of gate down time per hour. The average delay per vehicle during a 24-hour period is estimated to increase by less than 1 second per vehicle, compared to No BIG Baseline conditions. Further, the crossing is forecast to have an average delay per vehicle under 20 seconds (LOS B or better) under Plus BIG conditions. Moreover, as discussed in detail in Consolidated Response 08-01, the increased rail activity's effects concerning traffic delay are not considered a significant impact on the environment under CEQA.

Consolidated Response 10-03: Increased Rail Activity's Effects Concerning Emergency Response Delays at the Silver Lakes/Helendale Community At-Grade Crossings

As discussed in **Draft EIR Impact 5.14-1** and **Draft EIR Impact 5.14-2** (page 5.14-40), CEQA requires analysis of emergency response times only to the extent that a project's potential effects on response times would result in or require construction of new or physically altered fire or police protection facilities, and such construction would cause significant environmental impacts. Notwithstanding, and as noted in **Consolidated Response 08-01**, the effects of BIG's increased rail activity concerning traffic delays at nine at-grade railroad crossings, including Vista Road in Helendale, were analyzed in the At-Grade Crossing Evaluation**.** As noted in the At-Grade Crossing Evaluation and Draft EIR, BIG proposes to add approximately 3-4 trains per day in Opening Year 2028 and 5 trains per day in Horizon Year 2048 over No BIG Baseline conditions. With this increase, BIG would add approximately 10 to 13 minutes of gate down time per day at the Vista Road crossing. This equates to an average increase of about 30 seconds of gate down time per hour at the Vista Road crossing. The average delay per vehicle during a 24-hour period is estimated to increase by less than 1 second per vehicle, compared to No BIG Baseline conditions. Further, the Vista Road crossing is forecast to have an average delay per vehicle under 20 seconds (LOS B or better) under Plus BIG conditions. As such, it can be inferred that emergency vehicles would experience similar delay increases at the Vista Road crossing. As discussed in **Consolidated Response 08-01**, delay, in and of itself, is not considered a significant impact on the environment under CEQA. CEQA requires analysis of emergency response times only to the extent that a project's effects would result in or require construction of new or physically altered fire or police protection facilities that could cause significant environmental impacts. As previously noted, the average delay per vehicle (including emergency vehicles) during a 24-hour period is estimated to increase by less than 1 second per vehicle at the Vista Road crossing. BIG's increase in delay is considered minimal and would not result in or require construction of

new or physically altered fire or police protection facilities; therefore, BIG would result in a less than significant impact in this regard.

Consolidated Response 10-04: Increased Rail Activity's Effects Concerning Traffic Delay and School Transportation Needs

As noted in the *At-Grade Crossing Evaluation*, under Plus BIG conditions, BIG would add approximately three to five trains per day, for a total increase in gate down time of approximately 10 minutes per day in 2028 and 13 minutes per day in 2048 at the Vista Road crossing (see Table 1 – Summary of Study At-Grade Crossings). This equates to an average increase of approximately 30 seconds of gate down time per hour. BIG would impact school transportation if the 3-5 additional trains attributable to BIG were to pass the Vista Road crossing during hours when residents or buses were traveling to or from school (generally, approximately one hour in the morning and approximately one hour in the afternoon). Thus, if trains attributable to BIG were to pass the Vista Road crossing at any other hour during the day (22 of the 24 hours), there would be no effect on school transportation, and even if a train were to pass through the Vista Road crossing during the morning or afternoon hour of school transportation, there would only an additional 2.6 minutes of gate-down time per train, on average, as shown on **Table 1 – Summary of Study At-Grade Crossings**.

Consolidated Response 10-05: Cumulative Impacts to the Silver Lakes/Helendale Community

Some comments assert that the Draft EIR did not, or did not sufficiently, address cumulative impacts on the Community. See **Consolidated Response 09-06** concerning consideration of cumulative impacts. Review of **Draft EIR Figure 6.2-1** (page 6-6) indicates that there are no cumulative projects identified within or near the Silver Lakes/Helendale or Oro Grande Communities. Therefore, no cumulative impacts related to localized operational emissions would occur near the Silver Lakes/Helendale Community. However, **Draft EIR Section 6.4: Corridor Cumulative Projects** (page 6-5) provides an analysis of cumulative operational emissions impacts associated with the mainline rail corridor, which traverses the Community (i.e., the Silver Lakes/Helendale Community Corridor segment). The analysis pertaining to the Mojave Desert Air Basin (MDAB) where the Silver Lakes/Helendale Community is located is in **Draft EIR Section 6.4.2: MDAB** (page 6-5). This analysis considers two Corridor segments within the MDAB – one east of the BIG Footprint and one west of the BIG Footprint where the Silver Lakes/Helendale Community is located. The Corridor segment located west of BIG lies between the BIG Footprint and the Silver Lakes/Helendale Community. Dispersion modeling of off-site BIG operational emissions was performed to assess impacts to air concentrations along the rail corridor west of the BIG Footprint to the Silver Lakes Community. This segment is located closest to sensitive receptors that are not adjacent to the BIG footprint. The concentrations were modeled for BIG Opening Year 2028, Interim Year 2033, and Horizon Year 2048. **Draft EIR Table 5.3-33: Corridor – MDAQMD West of BIG Segment Operations** (pages 5.3-133 and 5.3-134) presents the maximum off-site ground level concentrations of criteria pollutants estimated along the rail segment west of BIG to the Silver Lakes Community. As shown in **Table 5.3-33**, unmitigated BIG operations would not exceed the NAAQS or CAAQS in any of the analysis years.

Consolidated Response 10-06: Feasible and Enforceable Mitigation for the Silver Lakes/ Helendale Community

Some comments request construction of a grade separation (overpass) or an alternative access route for Silver Lakes and mitigation commitment and enforceability of these improvements. As discussed in Consolidated Response 05 above concerning feasible and enforceable mitigation, mitigation is required only for significant environmental impacts (PRC 21100(b)(3); State CEQA Guidelines §§ 5126.4(a)(1)(A) and 15064(e)). As discussed in Consolidated Responses 08-01, 10-02, 08-03, and 10-03 concerning the increased rail activity's effects regarding traffic and emergency response delays, and Consolidated Response 10-01 concerning the increased rail activity's effects regarding emergency access, BIG would not result in a significant impact on the environment. Therefore, because no significant environmental impact would occur concerning delay or access, construction of a grade separation (overpass) or an alternative access route for the Silver Lakes Community is not required pursuant to CEQA.

Consolidated Response 10-07 Potential Impacts on the Silver Lakes/Helendale Community

Some comments assert that the Draft EIR did not, or did not sufficiently, address BIG's potential effects on the Silver Lakes/Helendale Community. See **Consolidated Response 04** concerning potential impacts on communities.

Consolidated Response 10-08 Potential Impacts on the Silver Lakes/Helendale Community Concerning Hazardous Materials

Some comments assert that the Draft EIR did not, or did not sufficiently, address BIG's potential hazardous materials-related impacts on the Silver Lakes/Helendale Community. See **Consolidated Response 08** regarding potential impacts concerning hazardous materials.

Consolidated Response 10-09 Increased Rail Activity's Effects on Traffic Delay and Decreased Property Values

Some comments assert that the Draft EIR did not, or did not sufficiently, address BIG's potential effects on the Silver Lakes/Helendale Community concerning decreased property values due to traffic delays. See **Consolidated Response 06-02** concerning socio-economic impacts and **Consolidated Response 06-05** concerning decreased property values.

CONSOLIDATED RESPONSE 11: ENERGY AND POWER SUPPLY

Some comments assert that the Draft EIR did not sufficiently address BIG's effects concerning power supply. BIG incorporated power reliability planning from the earliest design and environmental review stages. Rather than relying on Barstow's existing electrical system to absorb a sudden, large new load, BIG was designed to evaluate fullest power needs based on feasible technology and by working with Southern California Edison (SCE) to add the necessary capacity, phase power intensive uses gradually, and reduce reliance on the regional grid.

As discussed in the Draft EIR (page 3-62), BIG's operational electric power demand would be met through connecting to the SCE Tortilla Substation and supplemented with on-site electrical generation including an approximately 140-acre, approximately 21 megawatt (MW) solar power generation facility (i.e., solar farm). The proposed on-site electric power facilities to serve BIG are described in the Draft EIR beginning on page 3-62. The proposed off-site electric power facilities to serve BIG are described in the Draft EIR beginning on page 3-78. Additionally, BIG would comply with Title 24 CALGreen regulations requiring that rooftop solar generation be installed on the industrial warehouse rooftops (Title 24, § 140.10). Based on 9.0 million square feet of transload warehouse, BIG would include approximately 6.4 megawatts MW, or approximately 11,680 megawatt hours (MWh) (annually), of rooftop solar generation for Title 24 compliance (Draft EIR, p. 5.6-39). Together, BNSF's investment in electrification is over $100 million, including both upgrades to SCE's distribution system, as well as extensive electrical systems within the railyard.

BIG also includes a private onsite solar energy facility, which is intended to supply a substantial portion of BIG's operational power internally rather than drawing it all from the local grid. By generating electricity on site, BIG reduces peak demand on the regional utility system, insulates local neighborhoods from sudden load increases, and minimizes the risk of brownouts or service interruptions during high use periods. While the solar facility would provide on-site power and reduce demand overall during periods of sunshine, it would not contribute to the site's power budget or to reducing peak demand because solar power is an intermittent source, i.e., not dispatchable on demand (see "Determining BIG's Peak Power Demands," below).

As discussed below, the Draft EIR energy analysis (page 5.6-39) and the *A Power Plan for Barstow International Gateway* (Burns & McDonnell, March 2026) (Power Budget Memorandum) explain that the estimated peak demand of 65 MW does not indicate a need for additional power capacity to serve BIG. Electrical infrastructure upgrades are a required component of BIG's development. **Draft EIR Section 3.0** identifies BIG's proposed on- and off-site utility improvements. These upgrades include new distribution infrastructure sized specifically for BIG's operational needs. It is noted that because power infrastructure improvements must be completed in advance of each BIG development phase, BIG would not depend on existing residential or commercial feeders, and coordination with SCE has occurred and will continue to occur to ensure no degradation of service to current customers, including residential customers.

Evaluation of BIG's Electrification Needs

As part of BNSF's evaluation and engineering design of the BIG facility, BNSF considered the potential for maximum electrification of operations at the facility. The ultimate ability to implement electrification of operations was dependent on two variables: (1) availability of power and (2) viability of electrical equipment. Burns & McDonnell (BMcD) and its consulting arm, 1898 & Co., were retained to determine the maximum amount of power that could be obtained with available SCE electrical infrastructure. 1898 & Co., in coordination with BNSF and SCE, concluded that the power demand for BIG was 65 MW as discussed in Section 4.1 of the Power Budget Memorandum.

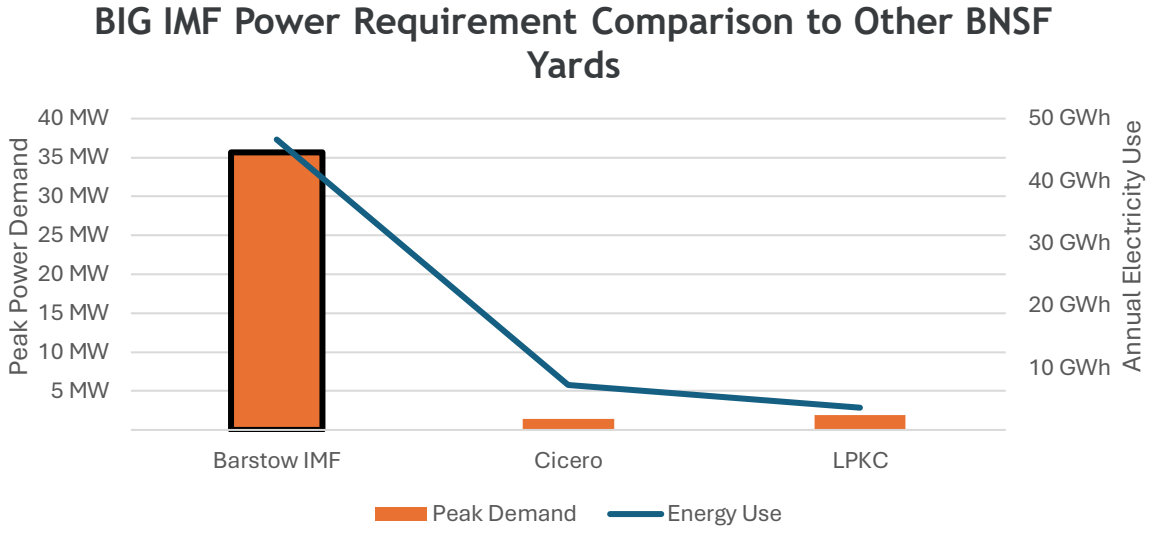
This evaluation involved two key steps:

1. **Use of Real-World Operating Data:** BNSF used operational data from BNSF's existing similar facilities to model load diversity (e.g., how many cranes simultaneously lift cargo).
2. **Focus on Feasible Technology:** BNSF evaluated for use electrified equipment for the facility and incorporated all feasible technology as part of BIG, including zero-emission widespan cranes, forklifts, top picks/side loaders, and hostlers.

The Power Budget Memorandum provides a detailed discussion of the power demands of feasible electric technologies, including 100% electrified hostlers, electric rail-mounted gantry cranes, forklifts, and top picks/side loaders. This equipment results in peak power demand of 65 MW, markedly higher than the typical logistics park's power demand of less than 5 MW. Because BIG's use of zero emission cargo handling equipment has been planned in accordance with feasibility analyses, BIG would not add large electric loads before sufficient generation and distribution capacity exists. This approach prevents sudden spikes in electricity demand, avoids forcing local emergency upgrades, and maintains reliability for both BIG and surrounding communities.

Because BIG would be a 24/7 facility, power loads associated with speculative electric technologies that are not yet operationally, technologically, commercially or economically feasible were excluded from BIG's design. For context, BNSF's other logistics parks that have a similar number of container lifts per year as BIG have power demands of much less than 5 MW (see Power Budget Memorandum, Figure 1, included below). Because BNSF made a substantial commitment to electric equipment at BIG, the resulting power demand was more than six times that of a typical rail facility. Figure 1 depicts the order-of-magnitude difference in estimated electrical power requirements for BIG's IMF relative to similar BNSF facilities.

Figure 1: IMF Power Requirement Comparison to Other BNSF Yards[43]



[43] *Based on historical utility data provided by BNSF in 2023.*

The Draft EIR does not need to analyze the power requirements of infeasible technologies. Moreover, BIG's peak power demand of 65 MW is less than BIG's maximum available grid capacity of 66 MW. Thus, CEQA requires no analysis of improvements or operational changes to expand that capacity, such as staggered charging schedules or inclusion of additional battery energy storage systems (BESS).

Determining BIG's Peak Power Needs

To calculate BIG's power needs in MW, electricity end uses were identified and grouped by common electrical connection point classifications – three connections in the IMF, and one connection for the BIG Logistics Park (LP) (Power Budget Memorandum, Table 1). Each connection has its own power demand limit which, cumulatively, add up to the overall site 66 MW capacity limit discussed below (see also, Power Budget Memorandum, Section 4). In total, BIG's peak coincident power demand across these connections would be 65 MW.

Why Peak Demand Matters

Power demand modeling focuses on a "peak" operational day rather than an "average" operational day to reduce the risk of exceeding finite energy capacity limits, tripping breakers and abruptly shutting down operations. Even a momentary overload of the SCE system would trip the site's breakers, instantly stopping cranes from moving containers to and from the trains and potentially taking over an hour to restore. A few minutes later, logistics systems that dictate where individual packages go within containers would also shut down. BIG's on-site generators would be unable to keep the facility running at full throughput. Cascading impacts would extend beyond BIG, leading to potential delays at the Ports if BIG-bound trains are delayed and terminals are forced to slow or even halt unloading containers from ships. Thus, even a momentary outage would have significant effects, with the net effect of a single hour without power resulting in days of delays for businesses and consumers of containerized goods.

The vast majority of electrical end-uses at BIG are considered critical to its operation and would require a high degree of electrical reliability. BNSF must be able to operate BIG at its maximum capacity without the risk of facing load shedding requirements from SCE. Accordingly, peak power demand modeling is necessarily conservative to ensure operational reliability and supply chain stability.

Modeling Inputs

The primary objective in developing the peak power demand model was to assess the viability of a "66 MW solution" which would be sufficient to meet BIG's electrical power needs for the site. The analysis calculated coincident peak power demand to model the expected, realistic peak load demand during normal operations. The modeling uses a 15-minute-interval modeling process to capture reasonable, worst-case power demand that could contribute to overall coincident peak power demand of BIG during any 15-minute-interval during the year. A 15-minute interval is more accurate than the industry-standard hourly (8,760) modeling process, accurately representing BNSF's operating schedules and associated sub-hourly energy consumption of its fleet.

The peak power demand model used operational data from similar BNSF facilities to model load diversity (e.g., how many cranes simultaneously lift cargo), only analyzing electric equipment that is operationally, technologically, commercially and economically feasible. Load profiles were calculated as described in

Appendix 5.6 GP-1 (Energy Modeling) for BIG's total power requirements, as well as for individual pieces of major electrical equipment to be used in both BIG's Intermodal Facility (IMF) and the BIG LP (see **Power Budget Memorandum, Table 1**).

Peak Demand Model Output: Seasonal and Temporal Power Demand Variability

BIG's coincident peak demand is estimated to occur at 6 AM in December due to electric building heating loads at the LP overlapping with the cargo handling equipment charging spike between the third and first shifts during BIG's busiest months for container throughput (October through December).

The Power Budget Memorandum's modeling, shown in Figure 2, intentionally excludes the impact of BIG's solar and BESS assets. Solar assets rely on clear, sunny days for full production capability, with output decreasing by nearly 90% on cloudy days. BNSF would, therefore, be unable to use solar energy to offset peak demand before the sun has risen. Additionally, the manufacturer-rated aggregated maximum system output capacity under ideal conditions for Title 24-required BESS at the LP is expected to be approximately 2 MW. Because this capacity is far below BIG's peak demand of 65 MW, the benefit of such BESS to reduce BIG's peak demand of 65 MW is minor. Additionally, because the BESS infrastructure would be owned and operated by logistics park tenants, BNSF would not be able to control dispatch of BESS energy to meet peak demand.

SCE Grid Capacity is Limited

Designing for BIG's peak operational demand requires over $100 million in power infrastructure investments for BIG and a critical partnership with the local utility, SCE. The process is more complex than simply connecting to the grid; it requires balancing BIG's large-scale needs with SCE's obligation to provide reliable power to all its customers. Power supply limits established for BIG are driven not by project preference but by system capabilities, California Public Utilities Commission (CPUC) requirements, and mandatory grid reliability standards applicable to all SCE customers.

Maximum Capacity for BIG is 66 MW

SCE must constrain BIG's power capacity according to the Reliability Rule; the Distribution Circuit limit; and the "Three Connection" rule.

1. The Reliability Rule (N-1 Contingency): Circuits must maintain enough spare capacity for SCE to take one circuit out of service (for maintenance or in an emergency) and still be able to serve all their customers. No single connection can use too much of the total circuit capacity.
2. Distribution Circuit Limit: To accommodate the Reliability Rule, any single load cannot draw more than 50% of the circuit's normal rating under "average" conditions. For the largest distribution circuit in SCE's 33-kilovolt (kV) system, this would be 13.5 MW.
3. The "Three Connection" Rule: the CPUC limits each customer to a maximum of three separate power service points (meters).

These constraints mean BIG can only be powered at three connection points. Although three circuits have a total capacity of 81 MW (3 × 27 MW) in continuous operation, they can supply only 66 MW (2 × 33 MW) with one out of service, using their emergency ratings. While BIG's total demand would not exceed

66 MW, BIG could not be served as a single customer under the Three-Connection Rule. In Barstow's distribution system, the Three-Connection Rule's load-shifting requirement means that power supply is limited to approximately 40.5 MW (3 × 13.5 MW).

Expanding Grid Capacity is Not Viable

To achieve the electrification needed for BIG using the area's existing, and proposed new 33 kV distribution system, BNSF would build new infrastructure to SCE's Tortilla Substation, using existing easements and providing a single and certain solution for BIG. This requires strict adherence to the operational limitations discussed above.

BIG's peak power demand does not require expanding capacity beyond 66 MW. Expansion would require construction of a new substation, which would likely take 7 to 10 years to complete, factoring in planning, design, approval, and construction.[44] A new transmission line, and associated large-scale infrastructure, would be required to supply the new substation, adding regulatory complications and requiring over a mile of easements for the associated 60-foot transmission towers. The regulatory hurdles and litigation risk associated with the infrastructure required to expand grid capacity beyond 66 MW would undermine project viability. Therefore, 66 MW is the maximum power that can reasonably be achieved within BIG's critical timeframe.

Renewable Power Assessments

As of 2024, 49% of SCE's power supply was composed of renewables and zero-carbon resources. SCE's power supply must be 100% composed of such resources by 2045 under SB 100. Accordingly, a substantial amount of BIG's electricity needs would be voluntarily met by renewable energy from the IMF solar farm, the site would be 100% powered by renewable energy once SCE reaches the SB 100 target. Moreover, BIG's design includes the maximum solar power allowed under SCE's net billing tariff and the BESS required by state Title 24 regulations.

While renewable power is not needed to meet BIG's peak power demand, BNSF evaluated a number of renewable options. The Draft EIR reflects the latest information about viable options for additional renewable power to serve the IMF's electricity requirements, based on annual viability assessments from 2023 to 2025 of solar, wind, and energy storage (see Power Budget Memorandum, Table 2, Summary of Proposed Renewable Energy Systems at BIG).

Notably, the renewable energy landscape has experienced remarkable volatility from tariffs; the creation, adjustment, and removal of federal tax credits, rendering them speculative; and reform of behind-the-meter (BTM) interconnection policy for California's investor-owned utilities, including SCE. Policy developments and commodity pricing have thereby dramatically changed the viability of on-site renewables from month to month.

[44] *California Public Utilities Commission September 12, 2024,* Decision Establishing Target Energization Time Periods and Procedure for Customers to Report Energization Delays (Docket 24-01-018, Decision 24-09-020). https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M540/K806/540806654.PDF (2024 data collected from utilities, including SCE, indicating an average of 8.9 years to complete a new substation project).

SCE Tariffs

The Report evaluated BIG's on-site renewable generation by reviewing SCE's interconnection requirements and retail electricity tariffs to inform both the business case and system design criteria. These tariffs have significant implications for the viability of renewable energy projects, and directly shaped BNSF's investment decisions regarding its solar system sizing and exclusion of BESS and wind generation.

Electricity Rates

The electricity rates for metered service at BIG would be TOU-8-D and TOU-EV-9 (see Power Budget Memorandum, Table 3). Under the "Three-Connection Rule," the three metering points within the IMF would be strategically divided, such that the western and eastern portions of the site can each receive one service on TOU-8D for end-uses other than electric vehicles. The eastern portion would also host a TOU-EV-9 metering point, connecting a dedicated 12 kV distribution system for some electric end-uses, including hostlers, fleet vehicles, and employee vehicles.

Renewable Interconnection Pathways

The complexity in BIG's metering scheme can create a challenge for BTM interconnection of renewable systems. SCE's standard Net Billing Tariff (NBT) limits generation to the amount of energy consumed annually at that meter. Each of the IMF's three meters would draw different amounts of power at different times. Because each connection has different demand levels and peak demand time, when supply of renewable energy exceeds demand at a dedicated renewable energy asset connected behind one metering point, that asset would not be able to export its excess supply to the other two metering points, thus creating an inefficiency. Resolving this inefficiency would require connecting the solar arrays from the IMF's east end to its west metering point with a new dedicated 12 kV circuit that is not otherwise needed. The new circuit would add at least $4M of cost to the Project, far exceeding the present net value of bill savings and tax incentives available by directly interconnecting renewables at the west metering point.

Given the complexity of this arrangement, SCE recommended interconnection via NBT-Aggregation (NBT-A). NBT-A allows for one system to offset multiple benefiting meters. While NBT-A would reduce energy charges, it would also greatly reduce the energy savings that provide economic justification for BESS.

Impact of Rules 15 and 16

A separate and critical consideration for renewable energy and BESS development at BIG are SCE's Rules 15 and 16, which govern reimbursement for new distribution infrastructure. Under Rule 15, SCE calculates the amount of reimbursement for utility distribution facilities based on the amount of money it expects a customer will pay in the first 10 years of service, adjusted based on actual billing over a 10-year period. For this reason, economic viability of on-site renewable energy generation or BESS is evaluated based on both energy bill savings and the reduction in reimbursement that would result in those savings reducing SCE's expected revenues.

As explained in Power Budget Memorandum Section 6.1.3, reductions in peak demand directly reduce the revenues used to calculate BNSF's infrastructure reimbursement. BESS, which primarily functions to reduce peak demand charges, would therefore reduce the BNSF's expected reimbursement. Accordingly, savings from using on-site renewables and BESS would reduce the revenue that SCE would use to calculate BNSF's reimbursement for its improvements to the 33 kV utility infrastructure. For example, if BNSF were to invest approximately $40 million in BESS to reduce energy costs from hostler fleet charging, a substantial portion of the savings would be offset by reduced infrastructure reimbursement. Rule 15 therefore materially weakens any net economic benefit of the BESS investment and operation.

Solar Power

BIG's proposed ~21 MWdc ground-mount solar system was studied using the National Laboratory of the Rockies' System Advisor Model (SAM) software. SAM was used to analyze the hourly benefits of solar power to serve BIG's demand under the Typical Energy Model, assuming SCE electricity rates in both NBT and NBT-A scenarios. Under both NBT and NBT-A, solar resulted in a positive return on investment, and was thus included in BIG.

The 21 MWdc size of this system is the maximum buildable system size on the parcels acquired by BNSF using industry-standard design assumptions. It is also the maximum size allowed by SCE's policy that systems interconnecting via NBT cannot produce more than 100% of the electricity that a customer will consume in a calendar year.

As discussed in Draft EIR section 5.6, Energy, BIG's rooftop solar would generate substantially more energy than is required by Title 24. **MM BIG EN-1** requires on-site renewable energy generation based on the maximum solar roof area available. Thus, BIG would generate approximately 31 GWh in addition to the approximately 12 GWh from code required rooftop solar. (Draft EIR pages 5.6-37, 5.6-39, and 5.6-45 to 5.6-46.)

Battery Energy Storage System

SAM was used to study the integration of a BESS with the planned ~21 MWdc system. Several different BESS deployment scenarios were studied to determine the economic viability of developing such systems. BESS in California can typically achieve payback through a combination of peak demand savings and energy arbitrage. Because of SCE's offering of the TOU-EV-9 rate and the unique impacts of the Rules 15 and 16 arrangement discussed above, it was concluded that a BESS to serve the IMF would not be able to effectively create demand charge savings. While the BESS could perform energy arbitrage using excess solar power or cheaper daytime SCE electricity to avoid imports of grid power in the most expensive time of use periods, this arbitrage value was not found to be sufficient to achieve payback on the investment of a BESS over a 25-year time horizon. While an appropriately sized BESS could augment BIG's electrical capacity above the available 66 MW from SCE, the estimated peak demand of 65 MW does not indicate a need for this additional power capacity.

Wind Power

The Power Budget Memorandum summarizes the analysis performed regarding the viability of using wind energy to augment solar generation to provide for BIG's power needs. Whereas cost-effective deployment

of wind turbines typically relies on wind speeds of 7.5 m/s, modeling indicated wind speeds at a 100 m height at BIG would only average 6.0 m/s. Moreover, both wind energy and solar energy lose production potential in the winter months, and wind turbines typically require 100 acres of land per MW of generation capacity. Wind electricity would thus be more expensive than electricity from SCE, eliminating the business case for wind turbine development at BIG.

Conclusion

As discussed above, the power evaluation involved two key steps:

1. **Use of Real-World Operating Data:** BNSF used operational data from BNSF's existing similar facilities to model load diversity (e.g., how many cranes simultaneously lift cargo).
2. **Focus on Feasible Technology:** BNSF evaluated for use electrified equipment for the facility and incorporated all feasible technology as part of BIG, including zero-emission widespan cranes, forklifts, top picks/side loaders, and hostlers. These feasibility determinations were made during project design. CEQA does not require analysis of infeasible technologies. Accordingly, this focus on feasible technology is proper.

The analysis shows that BIG's estimated 65 MW peak demand can be fully accommodated within SCE's available 66 MW capacity. This capacity is enabled through a combination of new distribution infrastructure and integration with existing utility systems. Given the constraints of the existing grid, project schedule, and utility planning processes, there is no practical or viable pathway to expand grid capacity. Accordingly, the 66 MW solution represents the maximum reliable and achievable power supply for BIG.

While renewable power is not needed to meet BIG's peak power demand, evaluation of on-site renewable energy and storage resources indicates that solar is the only feasible and economically viable supplemental energy source under current conditions and reasonably foreseeable future conditions. The proposed ~21 MWdc ground-mounted solar system, in combination with required rooftop solar installations, is expected to provide energy cost savings and demonstrate financial viability, but remains constrained by SCE interconnection policies, including NBT limitations, as well as site-specific design considerations.

BESSs were evaluated but are not viable beyond Title 24 requirements. Their value is limited under current tariff structures and the Rule 15 and Rule 16 cost recovery framework, as reductions in demand charges would reduce infrastructure reimbursement and offset much of the financial benefit. While an appropriately sized BESS could augment BIG's electrical capacity above the available 66 MW from SCE, the estimated peak demand of 65 MW does not indicate a need for this additional power capacity.

Similarly, wind energy was determined to not be viable due to inadequate resource conditions, unfavorable seasonal production, and significant land use requirements.

Based on these findings, BIG's energy demands can be reliably met through BNSF's $100 million investment in utility infrastructure. No additional viable renewable or storage alternatives have been identified that would materially supplement or replace the approved power supply.

CONSOLIDATED RESPONSE 12: PROJECT DESCRIPTION AND ENFORCEABILITY

This Consolidated Response addresses comments on the adequacy of the Draft EIR Project Description and enforceability of its features and benefits.

Consolidated Response 12-01: Project Description Requirement Under CEQA

The project description (**Draft EIR Section 3.0**) is a substantive requirement of a draft EIR, critical to a lead agency's ability to analyze a project's potential significant effects (State CEQA Guidelines § 15121(a)). CEQA specifies that a "project" means the "whole of an action, which has the potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment" (State CEQA Guidelines § 15378(a)). CEQA is explicit about what a draft EIR's project description must include, as well as certain parameters for the level of detail and scope of the information presented. Under State CEQA Guidelines § 15124, the required components include:

a) The precise location and boundaries of the proposed project;

b) A statement of objectives sought by the proposed project;

c) A general description of the project's technical, economic, and environmental characteristics; and

d) A statement briefly describing the intended uses of the EIR.

The adequacy of a project description must be evaluated in the context of its purpose, which in turn informs what makes a description inadequate. As long as the EIR'S description identifies the project's main features and other information needed for an assessment of the project's environmental impacts, the description may allow for the flexibility needed to respond to unforeseeable events and changing conditions that could affect the project's final design.[45] The Draft EIR complies with CEQA's requirements for a project description and includes each of the required components of State CEQA Guidelines § 15124. Overall, the Draft EIR contains a project description with sufficient information for the reader to understand all Project components and in enough detail to conduct the appropriate analysis of all potential environmental effects of the proposed Project in the EIR under CEQA standards. All final design details of the Project are not required to be known to sufficiently analyze the Project's impacts under CEQA. However, the description of that development includes the siting, size, and massing proposed to be built among other information that is sufficient to analyze and identify significant environmental impacts and mitigations. The level of detail is sufficient to analyze the Project impacts so that the public and decision makers can evaluate the Project's environmental impacts. Numerous detailed exhibits (referred to as "figures") and tables of existing and future conditions, and Project information support the Project Description. Additional details about certain Project characteristics are provided throughout Draft EIR.

Consolidated Response 12-02: Whole of the Project

This Consolidated Response addresses comments that contend that the Draft EIR's Project Description and analysis incorrectly exclude certain elements from the whole of the action that is the Project.

[45] *Citizens for a Sustainable Treasure Island v. City & County of San Francisco* (2014) 227 Cal App.4th 1036, 1053.

Taken together, all Project components described in **Draft EIR Section 3**, represent the "whole of the action" that is the proposed Project. Each of these elements is appropriately factored into the Project's impact analysis to ensure that all of the Project's potential environmental effects are analyzed. The Project Description may identify options in designs as long as the possible variations are fully described and separately evaluated, and the project's maximum possible scope is clearly disclosed.[46] Overall, the Draft EIR is consistent with the State CEQA Guidelines pertaining to an EIR project description and does not contain omissions or errors that preclude readers' clear understanding of what the Project proposes and its resulting environmental impacts.

Consolidated Response 12-03: Enforceability of the Project Components and Mitigation Measures for the Project

Some comments expressed concern about the enforceability of certain parts of the Project and mitigation measures, and how the lead agency will ensure that they will be implemented as part of the Project approvals. See also **Consolidated Response 05** concerning feasible and enforceable mitigation.

Generally, an EIR is certified, the findings are made as part of a project's approval, and the mitigation measures are included as conditions of approval. The findings and mitigation measures apply to the project's approval. (State CEQA Guidelines, § 15092(a).)

With respect to EIR certification, Public Resources Code § 21151(a) provides that "[a]ll local agencies shall prepare ... and certify the completion of[ ] an environmental impact report on any project that they intend to ... approve which may have a significant effect on the environment." State CEQA Guidelines § 15090(a) identifies what the agency must find to certify an EIR: that the final EIR has been completed in compliance with CEQA; that the final EIR was presented to its decision-making body and that body reviewed and considered the information in the final EIR prior to approving the project; and the final EIR reflects the lead agency's independent judgment and analysis. (State CEQA Guidelines, § 15090(a)(2), (a)(3).)

After the lead agency has certified the EIR, the agency considers whether to approve the project. This stage triggers CEQA's requirement for the agency to mitigate or avoid significant environmental impacts of the project when it is feasible to do so. (PRC, §§ 21002, 21081.) The lead agency must make specific findings with respect to the environmental impacts identified in the EIR in relation to the specific project being approved. These findings (often called the CEQA findings) may include: whether the project impacts are less than significant, less than significant with mitigation or significant and unavoidable; that feasible mitigation measures will reduce the environmental impacts to less than significant and the project is approved as mitigated; that a project alternative would avoid significant environmental impacts and is either infeasible or approved instead of a project; that significant environmental impacts cannot be reduced by feasible mitigation measures or an alternative but project benefits outweigh such unavoidable impacts, and, therefore, the project is approved based on a statement of overriding considerations; or that the project's environmental impacts are unacceptable and the project should be denied. (PRC, § 21081; State CEQA Guidelines § 15091.) The lead agency must adopt CEQA findings when it makes its first project approval.[47]

[46] *See South of Market Community Action Network v. City & County of San Francisco* (2019) 33 Cal.App.5th 321, 332.
[47] *Save Panoche Valley v. San Benito County* (2013) 217 Cal.App.4th 503, 530.

The lead agency must also adopt a MMRP for any mitigation measures imposed on the project. (State CEQA Guidelines § 15097(a).) As required by State CEQA Guidelines § 15126.4(a)(2), mitigation measures must be "fully enforceable through permit conditions, agreements, or other legally binding instruments," typically through the project approval documents. After the lead agency "approves or determines to carry out a project" that is subject to CEQA, the agency may file a Notice of Determination (NOD) within five working days which triggers CEQA's 30-day statute of limitations. (PRC, § 21152(a).) The NOD must reflect the agency's determination as to whether the project will have a significant effect on the environment and must state whether an EIR has been prepared. (PRC, §§ 21108(a), 21152(a).) "The purpose of these filings is to alert the public about environmental decisions."[48]

Comments assert that mitigation measures and project components in the EIR are not sufficiently enforceable through a legally binding means. Approval of BIG would occur if the City Council, after certifying the EIR, approves the entitlements for BIG, including adopting the BIG Specific Plan, and approving a subdivision map, prezonings, and a development agreement. LAFCO's approval of the annexation request would also be required. As noted above, when considering approval of the Project, CEQA requires the City Council to adopt a finding that "changes or additions have been required in, or incorporated into, the project" to avoid significant impacts, and findings regarding whether those changes are within the jurisdiction of the agency when it approves a project. (State CEQA Guidelines § 15091(a).) This requirement ensures that the mitigation measures included in the EIR are considered by decision makers and adopted as a requirement of the Project unless the decision makers determine that the measures are infeasible or find them to be in the jurisdiction of another agency. The City Council would have adopted all mitigation measures in the EIR as part of the conditions of approval for the Project entitlements unless they are determined by the City Council to be infeasible based on "specific economic, legal, social, technological, or other considerations" supported by substantial evidence in the record at the time of project approval (State CEQA Guidelines § 15091(a)(3), 15091(b)).

With respect to project components, as the Final EIR was drafted, the Development Agreement continued to be negotiated between the City and BNSF. If approved by the City, the Development Agreement will be a binding agreement between the City and BNSF, and will establish the terms under which development of the proposed BIG Project may occur.

The Development Agreement will include commitments by BNSF for certain BIG components and related features, including the following:

1. **Tier 4 Linehaul Locomotives.** Cross-dock intermodal containers (i.e., those taken by rail from the Ports to BIG's intermodal facility) for the BIG Project will be transported using a dedicated fleet of newly purchased Tier 4 linehaul locomotives, not pulled from the Developer's (i.e., BNSF's) existing national fleet.
2. **On-Site BIG Tier 4 Switcher Locomotives**. All Project switcher locomotives at BIG will be newly purchased Tier 4 locomotives, not pulled from Developer's existing national fleet.

[48] *Committee for Green Foothills v. Santa Clara* (2010) 48 Cal.4th 32, 43.

3. **Renewable Diesel.** Starting in BIG Project Opening Year 2028, the BIG Project sponsor will increase the renewable diesel composition within the Port of Los Angeles and Port of Long Beach's existing fueling site from 1 percent to 10 percent.
4. **Electric Cargo-Handling Equipment**. The BIG Project will use zero-emission rail-mounted gantry cranes, forklifts, top picks/side loaders, and hostlers. Containers will be transported between the rail yard and transload warehouse center using only electric hostlers, rather than heavy-duty trucks, and only via an onsite/private closed loop roadway to minimize local roadway traffic.
5. **Electric Appliances.** All BIG Project facilities will be all-electric, including all appliances and end uses, and not include natural gas.
6. **On-Site Solar Generation.** In addition to compliance with Title 24 energy requirements, the BIG Specific Plan includes an approximately 21-MWh solar farm and approximately 6.4 MWh from rooftop solar on the transload warehouse center buildings. The solar farm will include a new substation at its northwest corner to route power from the solar farm to the BIG rail yard. The BIG Project sponsor commits to installing solar panels on the solar ready canopies in the Intermodal facility employee parking lot, increasing its commitment to solar beyond Title 24 needs.
7. **Safe Haven Canopies.** The BIG Project will include onsite container safe haven canopies, which are facilities where damaged, leaking, or shifted containers or trailers would be placed to contain spills until they are loaded into an alternative container or trailer, or resecured, as necessary.
8. **Traffic Control Plan.** The BIG Project contractor will prepare a detailed Traffic Control Plan (TCP) in close consultation with the City to minimize the construction-related impacts on adjoining and nearby roadway, bicycle, and pedestrian facilities.

In addition, the Development Agreement or conditions of approval for the BIG Project's entitlements will include the following Project components and related commitments:

- BNSF has agreed to "remove from service in California all fifteen (15) Existing Barstow Yard Locomotives and replace them with six (6) higher horsepower minimum rated Tier 4 locomotive engines on or before the first day of rail operations at BIG," per the Superseding Cooperative Agreement between BNSF and the Mojave Desert Air Quality Management District, dated December 19, 2025.

The Development Agreement, conditions of approval in the subdivision map, and the MMRP would also ensure compliance with related provisions of SB 149. These BIG Project components and related commitments will be binding upon the City's approval of the Development Agreement, and related entitlements.

The Development Agreement, conditions of approval in the subdivision map, and the MMRP would also ensure compliance with related provisions of SB 149.

While the Development Agreement may be developed, in part, based on the information in the EIR (including project components and commitments to finance certain improvements), there may also be financial and business terms that are not related to CEQA. Any public comments received regarding the proposed Project's financial aspects and negotiations between the City and BNSF do not relate to the adequacy of the EIR, but will be provided to the decision makers to consider whether to approve the

Project entitlements. The anticipated project that will result if the Project entitlements are adopted by the City is described within the "Project Description" (i.e., **Draft EIR Section 3.0**), and the BIG Project's physical impacts, components, improvements, and infrastructure would not change based on any terms still being negotiated related to the Development Agreement.

Also, as stated above, a related requirement in State CEQA Guidelines § 15097 requires the lead agency to adopt a MMRP that establishes how the agency would monitor implementation of the adopted mitigation measures when it approves a project. The adequacy of a MMRP is evaluated according to the "rule of reason" with deference to the lead agency.[49] When it approves the Project, the City Council will adopt a MMRP, identifying the project sponsor, its agents, or successors as the parties responsible for implementing each mitigation measure, and indicate when the measure is to be implemented.

To the extent that comments concern the timing of mitigation, this will be specified in the MMRP that will be considered for adoption at the time of Project approval.

By including the mitigation measures and BIG Project components as a condition of approval in the entitlements for the BIG Project, the City would ensure that the mitigation measures and project components will be "fully enforceable" through a legal binding instrument as required by State CEQA Guidelines § 15126.4(a)(2). Also, approval of the Development Agreement will require findings that any physical environmental impacts of the terms of the Development Agreement are addressed in the EIR. Therefore, the Draft EIR appropriately defined and analyzed all environmental effects of the proposed Project, including all Project components, which could result from the Project entitlements, and no revisions are necessary in response to any comments received.

CONSOLIDATED RESPONSE 13: SPECULATION WITHOUT SUBSTANTIAL EVIDENCE AND REQUESTS FOR ADDITIONAL ANALYSIS AND STUDY

Some commenters assert impacts should be considered significant, but without supporting facts or other evidence. Other comments request additional studies or analysis on certain topics or impacts. The Consolidated Response addresses CEQA's requirements for substantial evidence and good faith efforts at disclosure.

Public Resources Code § 21082.2 requires that the lead agency "shall determine whether a project may have a significant effect on the environment based on substantial evidence in light of the whole record." State CEQA Guidelines § 15384 defines "substantial evidence" to be "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached." Under CEQA, argument, speculation and unsubstantiated opinion does not constitute substantial evidence. State CEQA Guidelines § 15384 states that "substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts."

Under CEQA, the decision as to whether an environmental effect should be considered significant is reserved for the discretion of the lead agency based on substantial evidence in the record as a whole. Where there are no facts available to substantiate a commenter's assertion that an impact of the Project

[49] *Natural Resources Defense Council, Inc. v. City of Los Angeles* (2023) 98 Cal.App.5th 1176, 1217.

is significant, the City, acting as the lead agency, is not required to analyze that effect nor to mitigate for that effect.

During the Draft EIR's public review period, some comments were submitted requesting additional analysis, studies, or revisions that are not provided in this Final EIR for reasons more specifically addressed in the individual comments. State CEQA Guidelines § 15204 provides that CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. State CEQA Guidelines § 15003 explains that CEQA does not require technical perfection in an EIR, but rather adequacy, completeness, and a good-faith effort at full disclosure; CEQA requires that decisions be informed and balanced. It must not be subverted into an instrument for the oppression and delay of social, economic, or recreational development or advancement. Under CEQA, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, so long as a good-faith effort at full disclosure is made in the EIR.

CONSOLIDATED RESPONSE 14: CONSIDERATION OF A RANGE OF REASONABLE ALTERNATIVES

Some comments questioned the adequacy of the alternative analysis in the Draft EIR and whether City analyzed a "no project" alternative, and other options. This Consolidated Responses explains CEQA requirements that an EIR include a reasonable range of alternatives, including a no project alternative, and discusses how alternatives were considered/rejected for the Draft EIR.

The State CEQA Guidelines require that an EIR include "a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project." State CEQA Guidelines § 15126.6(a) states that "an EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation." State CEQA Guidelines § 15126.6(f) describes a "rule of reason," stating that an EIR "set forth only those alternatives necessary to permit a reasoned choice," and "the EIR need examine in detail only the ones that the Lead Agency determines could feasibly attain most of the basic objectives of the project." An EIR is not required to consider alternatives to a component of a project, but only alternatives to the project as a whole.[50] Variations of the same alternative are also not required; "what is required is the production of information sufficient to permit a reasonable choice of alternatives so far as environmental aspects are concerned."[51] Lead Agency is not required to describe and evaluate the environmental impacts of alternatives at the same level of detail as the proposed project. (State CEQA Guidelines § 15126.6(d).)

The Lead Agency is charged with selecting a range of project alternatives for analysis and publicly disclosing its "reasoning for selecting those alternatives." (State CEQA Guidelines, § 15126.6, subd. (a)) Selecting a range of alternatives is a two-step process. First, the Lead Agency identifies potential project alternatives and assesses them for consistency with the fundamental purpose of the project, satisfying

50 *See State CEQA Guidelines § 15126.6(a); California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 993.

51 *Residents Ad Hoc Stadium Comm. v. Board of Trustees* (1979) 89 Cal.App.3d 274, 286; see also Cherry Valley Pass Acres & Neighbors v. City of Beaumont (2010) 190 Cal.App.4th 316, 355-56 [rejecting need to analyze every variation on the alternative continuum for housing project].

most of the basic project objectives, the ability to avoid significant environmental impacts, and feasibility and practicability (State CEQA Guidelines § 15126.6(c)). Alternatives that do not meet these threshold requirements are not included in the EIR for further analysis. In the second step, the Lead Agency evaluates the alternatives remaining, assessing them against the proposed project.

Consistent with the requirements of CEQA, detailed project objectives describe the underlying purpose of the project and aid the lead agency in developing a reasonable range of alternatives to evaluate in the EIR and thus provide more exact information to the decision-makers and public. (State CEQA Guidelines § 15124(b).) While a lead agency may not make a project's purpose "artificially narrow," it is permissible to establish reasonable goals and objectives for a project. For example, a lead agency would not be required to analyze inland locations for an oceanfront hotel or waterfront aquarium.[52] The agency's alternatives analysis will be upheld as long as there is a reasonable basis for the choices it has made.[53]

General Plan alternatives are necessarily different than project alternatives. For example, it is impractical to consider an alternative location for an entire city. Instead, general plan alternatives look at variations of development patterns to determine if one or more changes can reduce or eliminate an identified environmental impact. In this instance, the Draft EIR evaluated two alternatives: a No Project Alternative (No Proposed General Plan/2015 General Plan Alternative; and the No BIG/Proposed General Plan Reduced Development Alternative. The No Proposed General Plan/2015 General Plan Alternative would allow the existing 2015 General Plan to remain intact and would not consider approval of BIG. As shown in **Draft EIR Table 8-4** (page 8-52), the 2015 General Plan allows for significant growth in the City with an estimated increase in population of 11,301 persons and 5,394 jobs by 2048. The No BIG/Proposed General Plan Alternative would allow for the proposed General Plan update but would exclude BIG. Forecast development under the No BIG/Proposed General Plan Reduced Development Alternative would be similar to the No Proposed General Plan/2015 General Plan Alternative except concerning jobs, although the jobs would be less than anticipated in the proposed General Plan, as the industrial development would likely be up to 10 million square feet of conventional warehousing;(Draft EIR page 8-66). It is noted that both the adopted 2015 General Plan and the proposed General Plan include a wide range of land uses, including mixed uses (labeled as Diverse Use) that encourage a mix of development types. As discussed in **Draft EIR Section 4.0: Project Context**, even with this flexibility in land use type and a willingness to consider new development, the City has not growth appreciably in the last 20 years. As noted on Draft EIR page 4-5, the City's growth from 1990 to 2023 averaged approximately 0.4 percent annually. (Draft EIR page 4-5). Without BIG, it is likely that the City would continue with little to no growth over the planning period. Nonetheless, as stated on Draft EIR page 8-113, the No BIG/Proposed General Plan Alternative is identified as the environmentally superior alternative.

The City as the Lead Agency selected three alternatives of the BIG Project for in depth analysis in **Draft EIR Section 8.0**, including the required "No Project" alternative (i.e., no BIG alternative), a reduced intensity alternative, and a BIG West Transload Warehouse Center alternative. These three alternatives constitute the required "reasonable range" and are intended to inform a decision by the City Council whether to approve or disapprove the Project as proposed or alternately approve an alternative. A thorough and appropriate consideration given to select the reasonable range of alternatives studied is described in

[52] *In re Bay-Delta Programmatic Envtl. Impact Report Coordinated Proceedings* (2008) 43 Cal.4th 1143, 1166.

[53] *City of Maywood v. Los Angeles Unified School Dist.* (2012) 208 Cal.App.4th 362, 414, 416.

Draft EIR Section 8.6: Criteria Considered for Selecting Alternatives, and Draft EIR Section 8.8: Big Alternatives Considered But Rejected, in the EIR. The Draft EIR also examines six additional alternatives for BIG: Off-Site Alternatives; BIG Flipped Concept; BIG Reduced Flipped Concept; Block Swap Only; Intermodal Facility/Transload Warehouse Center Only; and No On-Site Warehouses. These alternatives were determined to be infeasible for the reasons stated in **Draft EIR Section 8.8**, and were not further analyzed in the range of alternatives.

Regarding alternatives, the No Project alternative was evaluated, as required by CEQA, which is a scenario where no development within the Mojave River, or its floodplain, is considered. However, the Lead Agency need not evaluate a range of alternatives that would reduce impacts to a less than significant level. Pursuant to State CEQA Guidelines § 15126.6, the range of feasible alternatives need only "substantially lessen one or more of the significant effects" of the project. Further, the Draft EIR is not required to consider alternatives which are infeasible, only "those that could feasibly accomplish most of the basic objectives of the project" (State CEQA Guidelines § 15126.6). Including an alternative (other than the No Project Alternative) that would avoid all significant environmental effects may be desirable, but that is not a CEQA requirement. It also was not feasible in this instance because any project of the scale being proposed (and therefore, any alternative that would achieve most of its basic objectives) would result in some significant impacts.

Accordingly, the selected alternatives foster meaningful public participation and informed decision making (State CEQA Guidelines § 15126.6(f)).

CONSOLIDATED RESPONSE 15: TRUCK MILES TRAVELED ANALYSIS

Some comments raised concerns about the analysis of truck trips associated with freight movement attributable to BIG, specifically related to the Draft EIR's Truck Miles Traveled (TMT) analysis.

Consolidated Response 15-01: Use of National TMT Data

Several comments assert that the Draft EIR's analyses that rely on TMT information improperly use nationwide data. However, while national TMT reductions are discussed in some parts of the analysis, where the analyses depend on localized TMT calculations (air quality, energy, greenhouse gases (GHG), and noise), these rely on study areas that are clearly stated. **Draft EIR Appendix 5.15 BIG-1** (page 141) states that "detailed BIG TMT calculations are included in **Appendix C: TMT Calculations**." This appendix includes a step-by-step discussion of each component of the TMT analysis used to generate TMT values throughout the Draft EIR. This discussion includes TMT analysis across the national roadway network, within only California, within only SCAQMD, and within only MDAQMD, and provides the calculations, assumptions, and underlying data used to generate the TMT numbers used throughout the Draft EIR.

The only exception to the above is the GHG emissions analysis, which considered national TMT reductions. This is consistent with CEQA. In amending the State CEQA Guidelines in 2018, the California Office of Planning and Research (now the Governor's Office of Land Use & Climate Innovation or "LCI") recognized that climate change is a global phenomenon and GHG emissions from a project are cumulative and incremental:

> *The CEQA Guidelines generally address greenhouse gas emissions as a cumulative impact due to the global nature of climate change. (Pub. Resources Code, § 21083, subd. (b)(2).) As the California Supreme Court explained, "because of the global scale of climate change, any one project's contribution is unlikely to be significant by itself." (Cleveland National Forest Foundation v. San Diego Assn. of Governments (2017) 3 Cal.5th 497, 512.) A project's significant greenhouse gas impacts must be disclosed and mitigated to the extent feasible whenever the lead agency determines that the project contributes to a significant, cumulative climate change impact. (CEQA Guidelines, §§ 15064.4, subd. (b), 15183.5.) Thus, "[t]he question therefore becomes whether the project's incremental addition of greenhouse gases is 'cumulatively considerable' in light of the global problem, and thus significant." (Cleveland National Forest, supra, 3 Cal.5th at 512, citation omitted.)*

Because of the cumulative and incremental effects of GHG emissions on global climate change, courts have held that out-of-state off-site offsets under State CEQA Guidelines § 15126.4, subd. (c), may be allowable mitigation under CEQA. In *Golden Door Properties, LLC v. County of San Diego* (2020) 50 Cal.App.5th 467, the court considered the following mitigation measure:

> Under M-GHG-l, the … "GPA project applicants shall achieve no net increase in GHG emissions from additional density above the 2011 GPU." For example, if 400 residential units were allowed under the GPU and a GPA proposes 500 residential units, the emissions for the 400 would be mitigated by implementing CAP reduction measures, thereby reducing GHG impacts from the 400 units to below significance. GHG emissions for the 100 additional units must be mitigated to zero through "*on-site design features and mitigation measures and off-site mitigation, including purchase of carbon offset credits....*" *[Italics added.]*

(50 Cal.App.5th at 495.) Further:

> *The County will consider, to the satisfaction of the Director of Planning & Development Services (PDS), the following geographic priorities for GHG reduction features, and GHG reduction projects and programs: 1) project design features/on-site reduction measures; 2) off-site within the unincorporated areas of the County of San Diego; 3) off-site within the County of San Diego; 4) off-site within the State of California; 5) off-site within the United States; and 6) off-site internationally.*

The same reasoning – that climate change is global phenomenon – applies equally to the location of the mitigation and the location of the emissions. *The national TMT reductions are a direct effect of the BIG project*. There is no valid scientific reason, or even logical reason, to exclude out-of-state GHG emissions reductions. State CEQA Guidelines § 15064.4 specifically instructs agencies to consider how the project's GHG emissions compare to the existing environment and states that a lead agency has discretion in selecting appropriate methodologies and thresholds to evaluate GHG emissions resulting from a project, provided it is supported by substantial evidence. The Draft EIR also is consistent in this reasoning as it considers out-of-state GHG emissions associated with rail deliveries during the BIG construction period, see **Draft EIR Section 5.8: Greenhouse Gases** (page 5.8-60).

Consolidated Response 15-02: Disclosure of Local Truck Miles Traveled Attributable to BIG

Some comments assert that the Draft EIR TMT analysis does not properly disclose local TMT associated with new truck trips attributable to BIG by instead focusing on national TMT. However, as explained below, the analysis presented in **Draft EIR Appendix 5.15 BIG-1** clearly discloses expected local freight movements and their associated TMT associated with BIG.

Draft EIR Appendix 5.15 BIG-1 Figures 32 to 34 (pages 142 to 143) compare No BIG Baseline (gray line work) and Plus BIG (orange line work) conditions, showing the expected local freight movement attributable to BIG. The locations referenced on the figures include Arizona/Nevada, Bakersfield, Boron, the Central Valley, and the Ports of Los Angeles/Long Beach.

TMT is also discussed in a local context in **Appendix C** to **Draft EIR Appendix 5.15 BIG-1**, which represents baseline and plus BIG TMT nationwide, within only California, within only SCAQMD, and within only MDAQMD. The calculations of baseline and plus BIG TMT are presented in a step-by-step process, including the data and assumptions used for the calculations, in **Appendix C** to **Draft EIR Appendix 5.15 BIG-1**.

Consolidated Response 15-03: Disclosure of Local Truck Trips Attributable to BIG

Several comments argue that BIG will generate new local heavy-duty truck trips, which are not properly disclosed or analyzed in the Draft EIR. However, such analyses are found in the No BIG Baseline TMT analysis described in **Draft EIR Appendix 5.15 BIG-1,** as well as the local analyses involving heavy-duty truck movement in the areas surrounding BIG including **Draft EIR Appendix 5.15 BIG-2** (LOS Analysis), **Appendix 5.3 BIG-1** (Air Quality), and **Appendix 5.12 BIG-1** (Noise). These commenters may also be mistaken, as BIG does not generate any significant amount of local truck trips. As discussed in detail below, only a very small percentage of truck trips will be made to or from BIG.

BIG's truck trip generation, distribution, and assignment are discussed in detail in **Draft EIR Appendix 5.15 BIG-2**; see Section 3.2: Trip Generation, Distribution, and Assignment Methodology and Section 5.0: Plus BIG Conditions. **Draft EIR Appendix 5.15 BIG-1 Section 8.1: Truck Miles Traveled** (pages 130 to 145) discusses truck miles traveled in detail. As illustrated in **Draft EIR Appendix 5.15 BIG-1** Figures 32 to 34 (which compare No BIG Baseline (gray line work) and Plus BIG (orange line work) conditions), and discussed on the previous pages, BIG would not create new truck trips to select cities but instead would reduce the number and length of existing truck trips to those same locations.

Central Valley, Boron, Arizona/Nevada and Victorville: As noted on **Draft EIR Appendix 5.15 BIG-1** page 138, a small percentage of containers served by the IMF would arrive at the IMF via heavy-duty trucks to reduce the travel distance/travel time due to traffic conditions that the container would otherwise encounter under No BIG Baseline Conditions. These containers are already being trucked to the Hobart/Commerce or San Bernardino IMFs but instead are forecast to divert to BIG, reducing TMT.

Hobart/Commerce, San Bernardino IMFs: No new truck trips are proposed by BIG.

Inland Empire: As noted on **Draft EIR Appendix 5.15 BIG-1** pages 133 to 135, some goods are expected to travel between the BIG transload warehouse center and existing transload warehouses in the Inland

Empire by truck. Again, these would not be new truck trips. The existing Inland Empire transload warehouses are already served by trucks. BIG would reduce the number and length of existing truck trips made to the Inland Empire transload warehouses by providing a train connection between the Ports and BIG's transload warehouse center.

Nationwide Destinations: As noted on **Draft EIR Appendix 5.15 BIG-1** pages 132 to 133, BIG is not adding new truck trips to Nationwide Destinations, but instead converts existing truck trips to be made mostly by train. This greatly reduces TMT. Further, as noted in the TMT analysis, only City-level data, based on collection of market data and industry experience, was available for the analysis, not specific locations or addresses. Actual addresses of origins and destinations are not possible for future anticipated market changes because there is no reliable and available information at this time and, thus, these specific locations are unknown and speculative. Without addresses for the exact locations where containers would originate/arrive, localized environmental impacts (traffic, air quality, and noise) cannot be analyzed and would be considered speculative because of the lack of available information to make reasonable assumptions regarding the location of such future impacts.

CONSOLIDATED RESPONSE 16: BATTERY ENERGY STORAGE SYSTEM

BESS were originally included in BIG's design to provide supplemental power to enable battery electric locomotives (BELs). However, as noted in the *Feasibility Analysis of New Propulsion Locomotive Technologies and Overhead Catenary for the BIG Project,* prepared by Michael E. Iden. P.E. dated March 2026 (*BEL and Catenary Feasibility Analysis*); and the *Operational and Economic Feasibility for BEL Switchers and Linehauls*, Burns & McDonnell, et al., March 13, 2026 (*BEL Economic Feasibility Memorandum*), BELs were determined to be infeasible due to technological, operational, and economic constraints. Furthermore, BELs would also exceed the facility's power budget as documented in the Draft EIR and further substantiated in the *Power Budget Memorandum*. Based on the determination that BELs would be infeasible, BESS were ultimately removed from BIG design. See the *Power Budget Memorandum* for substantiation that BESS is not viable to "mitigate peak loads or shift solar generation to support evening charging requirements" or otherwise expand grid capacity. Therefore, given BELs were infeasible, BESS was ultimately removed from BIG design.

CONSOLIDATED RESPONSE 17: HEALTH IMPACT ANALYSIS

Overview

In the California Supreme Court decision in *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502 ("*Friant Ranch*"), the Court found an EIR to be inadequate because it failed to make a reasonable effort to include an analysis that correlates a project's emissions to impacts on human health. In particular, the Court focused on air quality impact analysis for a project's significant emissions of oxides of nitrogen (NO_X) and Reactive Organic Gases (ROG), which are precursors to ozone formation, and of particulate matter with an aerodynamic diameter less than or equal to 2.5 micrometers ($PM_{2.5}$) emissions.

Here, the Draft EIR analyzes the health impacts of BIG by (1) "includ[ing] sufficient detail to enable those who did not participate in its preparation to understand and to consider meaningfully the issues the proposed project raises" and (2) by qualitatively "mak[ing] a reasonable effort to substantively connect a

project's air quality impacts to likely health consequences." (Draft EIR 5.3-59 to 5.3-61, 5.3-115 to 5.3-120, 5.3-124 to 5.3-161; Friant Ranch, 6 Cal.5th at 521).

In response to comments, including comments L17-49, O21-39, and O21-48, and to supplement the disclosures in the Draft EIR with additional *quantitative* information regarding BIG's "likely health consequences" for disclosure and informational purposes, to further satisfy the requirements of *Friant Ranch*, regional air quality modeling and a health impact analysis (HIA) were performed by BlueScape Environmental as set forth in its *Regional Air Quality Modeling and Health Impact Analysis for the Barstow International Gateway* (*HIA Report*) (BlueScape, April 2026). Specifically, BlueScape completed photochemical modeling work to support a HIA as described below. BlueScape generally followed SCAQMD study methods used for the *Final 2022 Air Quality Management Plan* (2022 AQMP, SCAQMD 2022a), to develop regional ozone and $PM_{2.5}$ air quality concentration predictions that were then entered into the U.S. Environmental Protection Agency (USEPA) Benefits Mapping and Analysis Program – Community Edition (BenMAP-CE, USEPA 2026a). While the Draft EIR included a quantitative health risk assessment conducted for BIG, analyzing the potential localized health risks associated with the release of toxic air contaminants near the BIG footprint, the HIA more broadly quantifies and estimates BIG's regional health impacts of BIG-related emissions in both the South Coast and Mojave Desert air basins.

Methodology

The HIA included BIG direct, or individual, construction and operational emissions of NOX and Reactive Organic Gases [ROG, or Volatile Organic Gases (VOCs), as a subset of Total Organic Gases (TOGs)], particulate matter (PM10 and PM2.5), Carbon Monoxide (CO), and Sulfur Oxides (SOX); these pollutants are all primary emissions or precursors to ozone or PM2.5 formation, and mirror the pollutants modeled by SCAQMD in their 2022 AQMP. To review regional impacts from these pollutants, SCAQMD completed photochemical modeling for the 2022 AQMP using the CMAQ model with 2018 regional emissions for baseline and future-year impacts (SCAQMD 2022a and 2022b). The HIA Report conservatively models emissions generated on or near the BIG footprint and locomotive emissions on the rail corridor between the Ports of Los Angeles and Long Beach (Ports) and Needles, California, with review of concentration impacts including the same geographic area modeled by SCAQMD for the 2022 AQMP. The approach is very conservative as, consistent with the HIA's stated conservative assumptions, emissions reduction from the substantial truck reductions were not included in the HIA.

Due to the orders-of-magnitude smaller emissions from BIG as compared to the baseline emissions inventory, the difference between the two sets of data (air concentration delta or "delta") was very small and not statistically meaningful. BenMAP-CE was used for the HIA to translate the potential BIG-incurred changes in ambient air ozone and $PM_{2.5}$ concentrations into potential human health outcomes of BIG. This approach is consistent with the USEPA's development and use of BenMAP-CE to understand potential regional health impact changes associated with concentration changes above baseline conditions.

BenMAP-CE itself does not model changes in air pollutant emissions or the resultant concentrations. These data must be input into BenMAP-CE as dispersion modeling results or generated from air pollution monitoring data (some monitoring data is pre-loaded in BenMAP-CE). The potential ambient air concentrations of ozone and PM2.5 in the region where BIG is located were estimated using the CAMx model as discussed in Section 4.0 of the HIA Report. As detailed, for each pollutant (ozone or PM2.5), each

modeling year (year 2026, 2033 or 2048) and analysis type, and emissions for both unmitigated and mitigated conditions, each CAMx model run generated two sets of data:

1. The ambient air concentrations based on the 2030 emissions inventory provided by SCAQMD, for the corresponding scenario year: 2026, 2033, or 2048; and
2. The resulting ambient air concentrations generated by adding BIG's emissions (unmitigated or mitigated) to the corresponding concentrations developed from the 2018 regional air emission inventory extrapolated by SCAQMD to 2030 (as described in Sections 3.1 and 4.5) and BIG scenario years.

Finally, BIG and cumulative ambient air concentration health impacts are considered locally. Like SCAQMD's 2022 AQMP methodology, the modeling domain used in the HIA is divided into a grid system comprised of 4 km by 4 km grid cells and the BIG Project's emissions for each study year are allocated to individual grid cells within this system.

Maximum Impacts

CAMx Concentration Modeling

The BIG regional air quality modeling scenario databases were simulated using the CAMx. CAMx was used to apportion pollutant emission increases to BIG emissions, including unmitigated and mitigated scenarios for 2026 (highest construction emissions year) and 2033 and 2048 (both operational years). The maximum results are presented below while the full results for BIG are shown in Section 4.7 of the *HIA Report.*

The CAMx modeling found that BIG's maximum impact would increase the regional daily 8-hour (MDA8) average ozone concentration by a maximum of 0.02752 parts per billion by volume (ppbv) for the 2026 unmitigated scenario. Thus, the ozone concentration changes above baseline conditions for *all* modeled scenarios are less than 2.75% of the USEPA 1 parts per billion (ppb) 8-hour average Significant Impact Level (SIL). Based on these results, ozone concentration changes due to BIG contribute very little to regional ozone formation, with the magnitude of the modeled changes being extremely small relative to regional background concentrations and subject to substantial modeling uncertainty. Therefore, the commenters, state, and regional air agencies, and the public can consider the specific health impacts due to BIG-related ozone concentration changes to not be statistically meaningful.

The maximum regional annual 24-hour average $PM_{2.5}$ concentration change above baseline conditions for all modeled BIG Project scenarios was estimated to be 0.05397 micrograms per cubic meter (mg/m^3) for the 2026 unmitigated scenario. The $PM_{2.5}$ concentration changes above baseline conditions for *all* modeled scenarios are less than 41.5% of the 0.13 mg/m^3 SIL. Based on these results, $PM_{2.5}$ concentration changes due to BIG contribute very little to regional $PM_{2.5}$ concentrations with modeled changes well below applicable screening levels and within the range where incremental impacts are not expected to be meaningfully distinguishable from background variability. Therefore, the state and regional air agencies, and the public can consider the specific health impacts due to the BIG Project-related $PM_{2.5}$ concentration changes to not be statistically meaningful.

Further, the maximum ozone 8-hour average SIL of 1 ppb is about 1.4% of the 70-ppb federal and state 8-hour ozone standards. The maximum PM2.5 SIL of 0.13 mg/m3 is about 1.4% of the 9 mg/m3 federal

annual average PM2.5 standard. While the purpose of an HIA was not to show compliance with ambient health standards (rather, the purpose is to assess potential regional health impacts of the BIG Project with respect to ozone and PM2.5-related health impacts), the SILs are related to regional health studies used to develop ambient health standards, and in site-specific project permitting (USEPA 2018a). Thus, because the incremental concentration impacts due to the BIG Project above the existing regional baseline do not exceed these SIL thresholds, these findings are substantial evidence that the BIG Project's concentration impacts on regional public health are not discernible from zero or even negative impacts (i.e., decrease in health endpoint occurrences) and therefore are not statistically meaningful; therefore, the BIG Project emissions reviewed for the HIA are not expected to have a perceptible health impact.

Health Impact BenMAP Modeling

While the HIA concluded that the BIG Project concentration impacts (and therefore the related modeled health impacts) are not meaningful and therefore less than significant, to provide commenters, state, and regional air agencies, and the public with additional disclosure, the HIA also provides specific health impact modeling results as compared to baseline health impacts on the regional population.

The specific health impacts for these pollutants were estimated using the BenMAP-CE health assessment model. The ozone and $PM_{2.5}$ concentration changes above baseline (or without BIG Project emissions) modeled by CAMx were converted to effects (or incidences) on various health "endpoints" representing premature mortality, hospitalizations, emergency room visits, and others, and then compared to the "background health incidence." The background health incidence is the actual incidence of health effects as measured in the local population in the absence of additional emissions from BIG. The maximum results are presented below while the full results of the BenMAP-CE health incidence calculations for BIG are shown in Section 5.3 of the *HIA Report.*

The maximum regional health impacts associated with emissions of ozone precursors resulting from BIG construction and operations included incidences of respiratory-related hospital admissions (0.00644 maximum incidences/year), mortality (0.01298 maximum incidences/year), and asthma-related emergency room visits (0.09367 maximum incidences/year) for all studied age groups combined. BIG's incremental health incidences for ozone are less than 0.000168% for any of the baseline number of health endpoint occurrences. The baseline is the actual health effect occurrences measured in the regional population without the emissions produced by BIG.

The maximum regional health impacts associated with emissions of PM2.5 resulting from BIG construction and operation included incidences of acute myocardial infarction (0.05572 maximum incidences/year), mortality (0.46089 maximum incidences/year), hospital admissions (0.13259 maximum incidences/year) and asthma-related emergency room visits (0.35755 maximum incidences/year) for all studied age groups combined. BIG's incremental health incidences for $PM_{2.5}$ are less than 0.000321% for any of the baseline number of health endpoint occurrences.

The very small BIG-related incremental changes in health endpoint occurrences, relative to the substantially larger number of baseline health endpoint occurrences, demonstrate that BIG would result in a negligible and statistically not meaningful contribution to regional health impacts; therefore, commenters, state, and regional air agencies, and the public can consider that BIG's concentration impacts on regional public health are not discernible from zero or even negative impacts (i.e., decrease in

health endpoint occurrences) and therefore are not statistically meaningful and not expected to have a perceptible health impact.

The Results are Localized

As described above, the concentration of health impacts are considered local. Like SCAQMD's methodology, the modeling domain used in the HIA is divided into a grid system comprised of 4 km by 4 km grid cells; the BIG Project's emissions for each study year are allocated to individual grid cells within this system. Thus, the BIG Project's health impacts that are incorporated into baseline health incidences, both along the rail corridor and in the Barstow area, are addressed by the HIA. ***This means, given the results of the HIA, Barstow residents and communities along the rail corridor would not experience any meaningful or discernible individual or cumulative health impacts or health endpoint increases as a result of BIG construction or operations.***

Cumulative Impacts

As set forth in **Draft EIR Section 5.3** and **Section 6**, the *only* BIG impacts on the rail corridor in the South Coast and Mojave Desert air basins are cumulative impacts for criteria pollutants. The cumulative impact evaluation in the Draft EIR followed the "list of projects" approach under State CEQA Guidelines, § 15130(b)(1)(B). The methodology used to evaluate cumulative impacts was very conservative because the emissions from any related project were unknown. Thus, although BIG-related concentrations on the rail corridor did not exceed any applicable ambient air quality standard (**Draft EIR Tables 5.3-32, 5.3-33**, and **5.3-32**), a cumulative impact on the rail corridor was conservatively assumed if there was *any* increase of criteria pollutants and there was at least one related project identified on the applicable Corridor segment. Based *only* on these very conservative cumulative impact findings, SCAQMD and other commenters seek corridor mitigation including BEL linehauls (at cost up to $906 million) and electrified catenary (at cost up to $8.7 billion).

In addition to providing additional disclosures responsive to *Friant Ranch*, the HIA can also be used to evaluate the BIG Project's cumulative impacts and the HIA shows there are in fact *no cumulative impacts* on the rail corridor under either the "list of projects" or "summary of projections contained in an adopted local, regional or statewide plan" approaches under State CEQA Guidelines § 15130(b)(1). The *HIA Report* states the following:

> *Cumulative project ambient air concentration impacts that might be combined with the BIG Project criteria pollutant emissions were not considered explicitly because the emissions of such cumulative projects would be speculative. However, such cumulative effects are addressed generally in HIA Report by the fact that SCAQMD's projected emissions to 2030 include the anticipated criteria pollutant emissions from existing cumulative projects regionally -- including point sources [e.g., power plants, refineries, and industrial sources such as BNSF's existing Barstow, San Bernardino and Commerce/Hobart railyards and Union Pacific's existing West Colton, Commerce/East Los Angeles and Intermodal Container Transfer Facility (ICTF) railyards] -- and future development regionally (i.e., activity growth in various source categories between SCAQMD's base and future years, which would include construction of large industrial commercial and residential development) (SCAQMD 2022a, Chapter 3).*

With respect to the "list of projects" approach, the HIA Report states:

> *BlueScape reviewed the lists of past, present, and probable future projects and, in our professional opinion, both SCAQMD's base and projected emissions and the base and projected emissions in this HIA consider emissions from these past, present, and future projects because SCAQMD has comprehensively addressed projected emissions that would include sources associated with that list of cumulative projects; stationary sources (point sources such as industrial facilities and area sources such as residential water heaters and architectural coatings); onroad and offroad mobile source combustion and roadway sources; rail and railyard sources; port and ocean-going vessels; and, a wide range of other source types." Additionally, SCAQMD considered future development by applying a growth rate (SCAQMD 2022a, Appendix III).*

However, even more directly, the HIA Report states, "[i]It should be noted this HIA and any California Environmental Quality Act (CEQA) conclusions drawn by this HIA are directly based on a summary of projections contained in an adopted local, regional or statewide plan, or related planning document, which describes or evaluates conditions contributing to the cumulative effect" as provided in State CEQA Guidelines § 15130(b)(1)(A)." Here, these adopted local, regional, or statewide plans include specifically the 2022 SCAQMD AQMP.

The findings related to cumulative impacts are the same. As the HIA Report finds, "Barstow residents and communities along the Corridor will not experience any meaningful or discernible individual or cumulative health impacts or health endpoint increases as a result of BIG construction or operations."

Although the HIA demonstrated there are no cumulative impacts on the rail corridor, the significance findings in **Draft EIR Section 6** are not being changed in the Final EIR to provide the most conservative disclosure.

Requested Corridor Mitigation is Unconstitutional

As described above, based *only* on the very conservative cumulative impact findings in the Draft EIR, SCAQMD and other commenters seek Corridor mitigation including BEL linehauls (at cost up to $906 million) and electrified catenary (at cost up to $8.7 billion). A mitigation measure cannot violate state or federal constitutional standards. (State CEQA Guidelines § 15041(a) ["A lead agency for a project has authority to require feasible changes in any or all activities involved in the project in order to substantially lessen or avoid significant effects on the environment, consistent with applicable constitutional requirements including the "rough proportionality" standard established by case law (*Nollan v. California Coastal Commission* (1987) 483 U.S. 825; *Dolan v. City of Tigard* (1994) 512 U.S. 374; *Ehrlich v. City of Culver City* (1996) 12 Cal. 4th 854; State CEQA Guidelines § 15126.4(a)(4) ["The mitigation measure must be 'roughly proportional' to the impacts of the project. *Dolan v. City of Tigard,* 512 U.S. 374 (1994)."].) Given the lack of any discernible or statistically meaningful concentration impacts on the Corridor, individually or cumulatively, the requested Corridor mitigation does not – and cannot - meet the roughly proportional standard.

In sum, SCAQMD states in its comment letter "that South Coast AQMD staff reviewed the DEIR with a focus on the air quality analysis and how the Proposed Project may affect the region within South Coast

AQMD jurisdiction." (page 4). The HIA confirms there are no significant impacts in the South Coast air basin. In the Mojave Desert air basin, the mitigated analysis (which includes both BIG footprint and Corridor emissions) shows exceedances of some MDAQMD mass emissions thresholds. However, of note, in its comment letter, the MDAQMD agrees that all feasible mitigation has been applied to the BIG Project, stating, "The District concurs with the analysis and findings for the BIG project as presented in the Draft EIR, including the use of all feasible mitigation and that the project remains significant after all identified feasible mitigation." (MDAQMD, December 10, 2025. Letter, page 2.)

2.4 PUBLIC AGENCY COMMENT LETTERS AND RESPONSES

FEDERAL AGENCY COMMENTS AND RESPONSES

COMMENT LETTER F1

Written comments on the Draft Environmental Impact Report (DEIR)

Davis CIV Scott Caine <scott.c.davis1@usmc.mil>

Mon 1/5/2026 6:44 AM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

Caution! This message was sent from outside your organization.

The Draft Environmental Impact Report (EIR) for the Barstow International Gateway (BIG) project outlines mitigation measures across air quality, traffic, noise, land use, and water resources. These measures aim to reduce the environmental burdens while allowing the project to move forward. F1-1

The area of Barstow and Victorville/Apple Valley is subject to high winds. The high winds have a negative impact on roofing and fencing. The high winds have a very positive impact on air quality. The air is cleaner because pollution gets naturally scrubbed by these high winds. Any other air quality mitigations like cleaner construction equipment and truck feet standards will increase the impact of the mitigation techniques. F1-2

The main streets of W. Main (Route 66) Street and Lenwood Road each lead to Interstate 58 and Interstate 15 respectfully. Both streets must be widened to accommodate increases in traffic flow. Traffic signals and cross walks must be installed at residential street crossings to lessen traffic impacts of speed and promote walkability. F1-3

The main streets of W. Main (Route 66) Street and Lenwood Road have a mixture of incompatible land uses. I would strongly suggest industrial, and warehousing be near the BIG location on W. Main Street and Lenwood Road while Commercial land uses be near existing residential areas along the eastern side of W. Main Street. The existing residential near Commercial/Retail/Food will increase traffic, but it will be a boon for the local economy. Increasing walkability and slowing traffic in these areas will be good for existing churches, schools, and residents. F1-4

The vegetation in Barstow is drought tolerant and low to the ground. It requires very little water. The addition of a reclaimed water system for facility usage should be adequate for sinks, lavatories, showers, water closets, and truck wash systems. Potable water systems usage should be cut way down, anyway. Reclaimed water systems should be used wherever they are allowed. Low impact Development principles should be built into the project and subsequent and supporting economic development projects. F1-5

In summary: The BIG project's mitigation measures include **cleaner equipment, stricter truck rules, noise barriers, habitat offsets, and water conservation**. These strategies aim to balance Barstow's economic growth with environmental sustainability. F1-6

Very Respectfully,
Scott Caine Davis
Community Planner
Asset Management Branch
Bldg 197. MCLB Barstow, CA
☎ Desk: (760) 577-6304, Cell: (619)586-0085

RESPONSE TO COMMENT LETTER F1, MARINE CORPS LOGISTICS BASE (MCLB) BARSTOW

F1-1 Commenter summarizes mitigation strategy for the Draft EIR but does not raise a question regarding the adequacy of the Draft EIR or its conclusions.

F1-2 Commenter express opinion regarding the value of the high winds in the area helping with localized air quality but does not raise a question regarding the adequacy of the Draft EIR or its conclusions.

F1-3 Roadways within the City, and adjacent to BIG, would be improved consistent with the proposed General Plan and BIG specific plan. The proposed General Plan establishes a new Business Park (BP) land use designation that is intended to encourage other employment focused development adjacent to BIG. The focus of the new land use designation is reduce the potential for new sensitive receptors next to BIG, but also to encourage locally-serving employment uses that would reduce the impact on regional road networks. The commenter expresses an opinion regarding land uses but does not raise a question regarding the adequacy of the Draft EIR or its conclusions.

F1-4 The existing land uses around Main Street and Lenwood Road represent existing land uses and patterns. Areas where future residential is permitted is limited to land controlled by the County of San Bernardino. Within the incorporated limits of Barstow, all other lands around this intersection are designated for industrial, commercial, and business park uses (see **Draft EIR Figure LU-1 Land Use Map in the Draft General Plan**). Additionally, the policies under Goal 1 in the Land Use Element of the Draft General Plan explicitly address land use compatibility, including the following:

Policy LU-1.1 Land Use Compatibility.

Require that new development be located, buffered, and designed to avoid or reduce (to an acceptable level), negative impacts on existing conforming uses and adjacent neighborhoods. Require that new residential development be located, buffered, and designed so as to not hinder the economic viability and continuity of areas planned for nonresidential uses.

Policy LU-1.4 Nonresidential West of 15/58.

Plan and prioritize undeveloped areas west of Highway 58 and Interstate 15 for non-residential uses to promote land use compatibility, protect and enhance residential neighborhoods, and maintain the viability of commercial and industrial businesses for the community's present and future economic viability.

Policy LU-1.6 Sphere of Influence.

Coordinate with the County to ensure that any future development that is approved by the County in the City's sphere of influence (SOI) is compatible with existing development in Barstow's incorporated boundaries, planned land uses as identified in the City's General Plan, adopted pre-zoning and specific plans that are within the City's SOI, and planned roadway, utility, and other infrastructure.

F1-5 Low Impact Design (LID) is a state requirement for all new development and would be applied to BIG.

F1-6 Commenter expresses an opinion regarding the mitigation strategy for the Draft EIR but does not raise a question regarding the adequacy of the Draft EIR or its conclusions. The City appreciates the continued collaboration with MCLB.

COMMENT LETTER F2

F2

REGION 9
SAN FRANCISCO, CA 94105

January 12, 2026

Chris Heldreth, Community Development Director
City of Barstow, Community Development Department
220 East Mountain View Street, Suite A
Barstow, California 92311

Subject: Barstow General Plan and Barstow International Gateway Draft Environmental Report

Dear Chris Heldreth:

The United States Environmental Protection Agency appreciates that the City of Barstow, in coordination with Burlington Northern Santa Fe Railway company, has prepared a Draft Environmental Impact Report analyzing the construction and operations-related impacts anticipated from the proposed 5,000-acre Barstow International Gateway railyard facility and updates to the City of Barstow General Plan. Please continue to coordinate with the USEPA, the Mojave Desert Air Quality Management District, the South Coast Air Quality Management District, and the California Air Resources Board as the railyard project design, operations, and mitigation measures are refined. In addition, we request notification when the Final Environmental Impact Report has been prepared, and note that we are available to coordinate regarding any future federal regulatory requirements related to the new railyard and associated solar facility. Please contact me at dunning.connell@epa.gov to discuss any questions regarding the USEPA's coordination role moving forward.

F2-1

Sincerely,

Connell Dunning
Environmental Review Branch

cc via email:
Alan De Salvio
Deputy Air Pollution Control Officer, Mojave Desert Air Quality Management District

Sam Wang
Air Quality Specialist, South Coast Air Quality Management District

Stanley Armstrong
Air Pollution Specialist, California Air Resources Board

RESPONSE TO COMMENT LETTER F2, US EPA

F2-1 The United States Environmental Protection Agency (U.S. EPA) has requested notification of the availability of the Final EIR. As requested, the U.S. EPA would be notified upon availability of the Final EIR. Comment has been noted pertaining to the U.S. EPA's availability to coordinate any future federal requirements that may be applicable or related to the proposed rail yard and solar farm.

STATE AGENCY COMMENTS AND RESPONSES

COMMENT LETTER S1

S1

STATE OF CALIFORNIA GAVIN NEWSOM, *Governor*

PUBLIC UTILITIES COMMISSION
320 WEST 4TH STREET, SUITE 500, LOS ANGELES, CA 90013

December 5, 2025 ENVR 20251200001

Chris Heldreth
Community Development Director
City of Barstow
220 East Main Street, Suite A
Barstow, CA 92311

Re: City of Barstow General Plan and Barstow International Gateway (BIG) SCH 2024020501 – *Draft Environmental Impact Report (DEIR)*

Dear Chris Heldreth,

The California Public Utilities Commission (Commission/CPUC) has jurisdiction over rail crossings (crossings) in California. The CPUC ensures that crossings are safely designed, constructed, and maintained. The Commission's Rail Crossings Engineering Branch (RCEB) is in receipt of the *Draft Environmental Impact Report (DEIR)* for the City of Barstow General Plan and Barstow International Gateway (BIG) Project. The City of Barstow (City) is the lead agency.

The project site is generally bordered by the Mojave River to the north, Main Street (also referred to as National Trails Highway or Route 66) to the south, Lenwood Road to the east, and Hinkley Road to the west. The proposed Project includes a new rail yard and intermodal facility with transloading warehouses, approximately 2.5 miles east of the existing BNSF Barstow rail yard on the BNSF Cajon subdivision.

S1-1

The existing Hinkley Road at-grade crossing (DOT# 026064L, CPUC# 002-10.60) currently sits within the western end of the Project limits and currently provides access to Main St. The Project proposes to permanently remove and close this crossing and realign Hinkley Rd along the north perimeter of the proposed rail yard and tie into Lenwood Rd to the east, as shown in Figure 3-17 of the DEIR. Offsite improvements also include construction of additional lead tracks and modifications to existing grade separated crossings between the BIG rail yard and existing BNSF Barstow rail yard.

The City should thoroughly evaluate the removal of access of Main St from Hinkley Rd and if existing and future vehicle demand necessitates the need of this access. Figure 5.15-6 classifies Hinkley Rd as a Secondary Highway for the region and ties into Main St, which is classified as a Major Highway. Should there be a need for the connection of Hinkley Rd and Main St to be maintained, the City should consider a grade separated crossing over the BNSF Cajon subdivision.

S1-2

Any proposed crossing modifications (including construction of additional tracks above or below an existing grade-separated roadway crossing) will require authorization from the CPUC through a General Order 88-B request and must also conform to the goals of the CPUC's Environmental and Social Justice Action Plan. This includes improving safety and access to transportation, improving local air quality and public health, and expanding outreach and public participation opportunities in disadvantaged communities. For more information, please visit https://www.cpuc.ca.gov/esjactionplan.

S1-3

Chris Heldreth
ENVR 20251200001
December 5, 2025

RCEB staff is available to discuss any potential safety impacts or concerns at the crossings and address any questions from the City. We encourage the project team to reach out to RCEB staff to discuss your project to ensure that we are fully understanding the scope of your project and that all requirements will be met for any CPUC authorization that is required. S1-4

If you have any questions, please contact Sergio Licon at (213) 503-4866, or sergio.licon@cpuc.ca.gov.

Sincerely,

Anh Truong, PE
Senior Utilities Engineer (Supervisor)
Rail Crossings Engineering Branch
Rail Safety Division

cc: State Clearinghouse, state.clearinghouse@opr.ca.gov
Dionisio Martinez, BNSF, dionisio.martinez@bnsf.com
Mark Teague, Placeworks, MTeague@PlaceWorks.com

RESPONSE TO COMMENT LETTER S1, CALIFORNIA PUBLIC UTILITIES COMMISSION (COMMISSION/CPUC)

The City acknowledges the Commission/CPUC's role as a Responsible Agency and its ability to exercise its own judgment regarding the Final EIR's adequacy in accordance with State CEQA Guidelines § 15096(e). A discussion related to the Commission/CPUC's jurisdiction relevant to the Project is included in **Draft EIR Section 3.0: Project Description** and **Draft EIR Sections 5.1** through **5.17**, as appropriate. The anticipated Commission/CPUC approvals are listed in **Draft EIR Table 3-16: Proposed General Plan Permits and Approvals** (page 3-92) and **Table 3-17: BIG Permits and Approvals** (page 3-93). Per CEQA, a responsible agency should provide substantive comments, supported by specific documentation, regarding those project activities within an area of expertise of the agency or that are required to be carried out or approved by the agency. (Pub. Resources Code, § 21153(c).) Consistent with this, the City has carefully reviewed the California Public Utilities Commission's comments on the Draft EIR and, where necessary, revised the EIR accordingly, except as otherwise explained in the responses to comments below.

S1-1 This is an introductory comment identifying the CPUC's jurisdiction over rail crossings (crossings) in California, the lead agency, project location, and other project details; comment noted. See also **Consolidated Response 04** concerning general non-CEQA issues.

S1-2 **Draft EIR Appendix 5.15 BIG-2: Level of Service Assessment – Transportation Analysis Figure 20: Study Area Roadway Segment Volumes – Existing No BIG Baseline** (page 86), identifies that Hinkley Road from Jiggs Road to Main Street, the roadway segment that includes the Hinkley Road at-grade crossing, has an Average Daily Traffic (ADT) Volume Passenger Car Equivalent (PCE) of 410. Since the time that counts were collected, BNSF acquired several parcels that load traffic onto Hinkley Road in BIG's vicinity. Therefore, current usage is expected to be less than what is reflected in the counts.

As discussed in **Draft EIR Section 5.15: Transportation** (pages 5.15-68 to 71), BIG proposes to realign Hinkley Road along the north perimeter of the proposed rail yard and connect it to Lenwood Road to the east, maintaining regional connectivity while removing the at-grade crossing at Main Street. This realignment is designed to preserve access for the limited number of vehicles currently using Hinkley Road, while also providing alternate emergency access and improving safety by eliminating the at-grade rail crossing. The City's proposed General Plan includes the proposed Hinkley Road vacation and realignment. As depicted on **General Plan Figure CM-1: Roadway Network**, Hinkley Road north of the proposed realignment is classified as a collector. Additionally, the proposed Hinkley Road vacation and realignment were discussed at length with the City of Barstow and County of San Bernardino.

See also **Consolidated Response 05** concerning feasible and enforceable mitigation and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

S1-3 As noted in the comment, BIG includes modifications to existing rail and roadway infrastructure, including changes to existing grade-separated and at-grade crossings. As described in **Draft EIR Section 5.17: Utilities and Service Systems Table 3-17: BIG Permits and Approvals** (page 3-93), all such improvements, including new track, roadway realignments,

bridge construction, and associated crossing modifications, would be designed and implemented in accordance with applicable federal, state, regional, and local regulations, standards, and policies, including those of the CPUC. Prior to construction, BIG would obtain required permits and approvals from the relevant agencies, including CPUC, with jurisdiction over rail, roadway, utility, and safety infrastructure.

The City also recognizes the importance of aligning Project actions with the goals of the CPUC's Environmental and Social Justice Action Plan, which include improving safety and access to transportation, enhancing local air quality and public health, and expanding outreach and participation opportunities in disadvantaged communities. The Draft EIR addresses these topics through detailed analysis of transportation safety (**Draft EIR Section 5.15: Transportation**), air quality (**Draft EIR Section 5.3: Air Quality**) and incorporation of community scoping meeting input into the Draft EIR analysis (**Draft EIR Section 2.0: Introduction**). Additionally, the Disadvantaged Communities Background Report (City of Barstow, 2025), prepared for the City's proposed General Plan and incorporated into the EIR, addresses environmental justice (pursuant to SB 1000) and public services for disadvantaged unincorporated communities (pursuant to SB 244). The Disadvantaged Communities Background Report additionally details the Office of Environmental Health Hazard Assessment's CalEnviroScreen 4.0 tool. CalEnviroScreen uses census tract boundaries and 21 indicators to identify environmental justice communities within proposed General Plan area (i.e., the City and it's SOI), including BIG. The indicators are divided into two categories; pollution burden, which addresses topics such as exposure and environmental effects, and population characteristics, which describe sensitive populations and socioeconomic factors. Accordingly, the proposed General Plan environmental justice policies, developed pursuant to SB 1000 and applicable to BIG, are informed by relevant environmental justice data and governing regulatory requirements. Analysis of potential conflicts with the proposed General Plan, including policies related to environmental justice, is included in **Draft EIR Section 5.11**, pages 5.11-36 to 45 and 5.11-69 to 90 (see analysis concerning policies LU-1.1, LU-1.4, LU-1.5, LU-1.7, LU-2.4, LU-4.3, LU-4.4, H-3.6, CM-2.1, CM-2.7, CM-3.2, S-2.7, S-2.8, and OSC-3.1). As noted in its analysis of **Impact 5.11-2**, BIG would not conflict with any of these policies.

Also see **Consolidated Response 06** concerning BIG's potential impacts on nearby communities.

S1-4 This comment provides contact information for further discussion. See also **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER S2

S2

From: Graulty, William@CalOES
To: cheldreth@barstowca.org
Cc: Mark Teague; CalOES Mitigation Planning; Raether, Constantin@CalOES
Subject: City of Barstow General Plan Update
Date: Monday, December 15, 2025 1:40:09 PM
Attachments: image001.png

Hello,

The California Governor's Office of Emergency Services (Cal OES) Local Hazard Mitigation Planning Team has taken the time to review the proposed updates/changes to your General Plan. Government Code 65302(g)(8) states "before preparing or revising its Safety Element, each city and county shall consult…. the Office of Emergency Services for the purpose of including information known by and available to the department." S2-1

The Cal OES Local Hazard Mitigation Planning Team reviews and compares your current Safety Element hazards against those listed in the most recent Federal Emergency Management Agency (FEMA) approved City of Barstow Local Hazard Mitigation Plan. S2-2

Our office has reviewed your proposed Safety Element and found no substantive changes to your hazard profiles when compared against the most recent FEMA-approved City of Barstow Local Hazard Mitigation Plan. S2-3

Please reach out to our office at mitigationplanning@caloes.ca.gov if you have any further questions or need additional assistance, including AB 2140 compliance. S2-4

Kind regards,

William Graulty
Office Technician
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California Governor's Office of Emergency Services
Cal OES
GOVERNOR'S OFFICE OF EMERGENCY SERVICES
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RESPONSE TO COMMENT LETTER S2, CAL OES

S2-1 through S-4 See **Consolidated Response 04** concerning general non-CEQA issues. The City acknowledges and appreciates CAL OES affirming "no substantive changes to [the City's] hazard profiles when compared against the most recent FEMA-approved City of Barstow Local Hazard Mitigation Plan.

COMMENT LETTER S3

S3

State of California—Transportation Agency GAVIN NEWSOM, Governor

DEPARTMENT OF CALIFORNIA HIGHWAY PATROL
300 East Mountain View St.
Barstow, CA 92311
(760) 255-5900
(800) 735-2929 (TT/TDD)
(800) 735-2922 (Voice)

December 15, 2025

File No.: 835.17401.20098

City of Barstow
220 E. Mountain View Street, Suite A
Barstow, California 92311

Subject: SCH# 2024020501

The Barstow Area of the California Highway Patrol received the "Notice of Completion and Environmental Document Transmittal," of the environmental document for the proposed City of Barstow General Plan Update and Barstow International Gateway (BIG) Specific Plan for State Clearinghouse (SCH# 2024020501). The California Highway Patrol's interest in commenting, surrounds our concern for public safety, specifically traffic in the Barstow area. S3-1

The Department's concerns with the potential impact of this project could include the following: increased traffic congestion, increased hazardous materials transportation, additional enforcement demands, increased railway incidents necessitating evacuations, and increased incidents requiring emergency response during construction. Commercial truck trailer combination vehicle traffic on local roadways and freeways will increase as materials and products are transported to, and from the worksite. S3-2

This project could have an impact on our operations due to the increased traffic congestion, which would necessitate the need for additional traffic control measures to mitigate the potential increase in traffic crashes. We are hopeful work project operators will diligently establish, monitor, and enforce work project rules related to vehicle safety as CHP personnel work to ensure compliance with the California Vehicle Code provisions.

If you have any questions regarding these concerns, please contact me at the California Highway Patrol Barstow Area office at (760) 255-5900. S3-3

Sincerely,

Adam Carmichall - for

N. KING, Captain
Commander
Barstow Area

Safety, Service, and Security ***An Internationally Accredited Agency***

RESPONSE TO COMMENT LETTER S3, CALIFORNIA HIGHWAY PATROL (CHP)

S3-1 This comment is an introductory comment outlining CHP for the Barstow Area's interest in maintaining public safety regarding traffic in the Barstow area. See also **Consolidated Response 04** concerning general non-CEQA issues. Commenter raises some concerns about the Draft EIR's analysis that are best addressed by sharing technical and scientific information, which is provided below.

S3-2 As discussed in **Draft EIR Appendix 5.15 BIG-1 CEQA Assessment – Transportation Analysis, Section 7.4: Emergency Access Impact Evaluation** (page 126), BIG's contractor would prepare a traffic control plan (TCP) which would minimize the impact of construction activities (e.g., road and lane closures) and construction traffic on adjoining and nearby roadways in close consultation with the City, local law enforcement, and Fire District officials. Emergency vehicle access would be maintained at all times to the construction site and adjacent land uses, and to and from fire stations, hospitals, and medical facilities near the construction site and along the truck routes. BIG would be conditioned by the City to prepare the TCP prior to issuance of an encroachment permit.

During operations, BIG is expected to have a transformative impact on Southern California's transportation system. BIG would substantially reduce heavy-duty truck travel nationwide by shifting freight movement from trucks to trains, cutting hundreds of millions of truck miles traveled annually, in furtherance of regional and State transportation plans and policies, as discussed in **Draft EIR Appendix 5.15 BIG-1 CEQA Assessment - Transportation Analysis Section 8.1: Truck Miles Traveled** (page 130). Additionally, by creating an employment hub in the Barstow area, BIG is projected to reduce vehicle miles traveled per worker and per resident, meaning it would help make regional transportation patterns more efficient (see Draft EIR page 5.15-2). While there would be increased passenger vehicle and truck trips near BIG as noted in the **Draft EIR Appendix 5.15 BIG-2 LOS Assessment – Transportation Analysis Section 5.3: BIG Trip Generation and Distribution** (page 131), across southern California there would be decreased opportunity for potential impacts associated with trucks on the state highway system because of the proposed mode shift from trucks to trains.

As discussed in **Draft EIR Section 5.9: Hazards, Hazardous Materials, and Wildfire** (page 5.9-114), truck congestion during construction and off-site accidents during hazardous materials and wastes 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 hazardous materials and waste generated during construction. However, BIG construction would be temporary, and hazardous materials transportation would not require transporting, storing, or disposing of hazardous materials and wastes in quantities greater than needed to support construction activities, thereby minimizing potential exposure of the public, workers, and the environment (see page 5.9-100).

As discussed in **Draft EIR Section 5.14: Public Services and Recreation**, annexation of approximately 2,785 acres of unincorporated County lands into the City of Barstow, including approximately 2,686 acres under SBLAFCO Action A and approximately 99 acres under SBLAFCO Action B, would transfer police protection responsibilities from the County and San Bernadino County (SBC) Sheriff to the Barstow Police Department's (BPD) (pages 5.14-51 and 5.14-52). Areas not annexed to the City would remain in the County and within SBC Sheriff responsibility. The CHP responsibility would remain unaltered, and the CHP would continue to patrol I-15, I-40, SR-247, SR- 127, SR-58, and U.S. Highway 395.

As discussed in **Draft EIR Section 5.9: Hazards, Hazardous Materials, and Wildfire** (page 5.9-91), BNSF has prepared a System Emergency Response Plan (Response Plan) to respond to emergencies including railway incidents potentially necessitating evacuation. The BNSF Response Plan contains policies in the event of an unanticipated accident, collision, or train derailment that could release hazardous materials and waste into the environment. In the event of a trail derailment, appropriate BNSF hazmat personnel are mobilized along with hazardous materials contractors, environmental response contractors, and shippers are notified immediately. See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including a discussion of evacuation plans.

S3-3 This comment provides contact information for further discussion; comment noted. See also **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER S4

S4

Extension of Deadline for Comments for 2024020501/2 BIG

Jakubowski, Scott@Wildlife <Scott.Jakubowski@Wildlife.ca.gov>

Tue 12/23/2025 1:11 PM

To:Chris Heldreth <cheldreth@barstowca.org>; mteague@placeworks.com <mteague@placeworks.com>; GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

Cc:Castaneda, Cindy@Wildlife <Cindy.Castaneda@Wildlife.ca.gov>;

Importance: High

[NOTICE: THIS IS AN EXTERNAL EMAIL]
Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!

This sender is trusted.

Hello Chris and Mark,

Happy Holidays!

We are currently reviewing and drafting comments for the Barstow General Plan Update and BIG DEIR (State Clearinghouse No. 2024020501/2), which are due January 5, 2026.

Given the substantial amount of information in these documents, we would like to know the absolute latest date would be for submitting our comments? An extension would allow us sufficient time to provide thorough and meaningful input. S4-1

Please let us know if there is any flexibility in the deadline of 1/5/26, or if an alternative submission date can be accommodated.

Thank you for your consideration, and we appreciate your assistance.

Regards,

Scott Jakubowski, Senior Environmental Scientist (Specialist)
California Department of Fish and Wildlife
Inland Deserts Region | Mojave Unit
3602 Inland Empire Blvd, Suite C-220
Ontario, CA 91764
(909) 354-0919
Scott.Jakubowski@Wildlife.ca.gov

RESPONSE TO COMMENT LETTER S4, CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE (CDFW)

The City acknowledges the CDFW's role as a Responsible Agency and its ability to exercise its own judgment regarding the Final EIR's adequacy in accordance with State CEQA Guidelines § 15096(e). A discussion related to the CDFW's jurisdiction relevant to BIG is included in **Draft EIR Section 3.0: Project Description** and **Draft EIR Sections 5.1** through **5.17**, as appropriate. The anticipated CDFW approvals are listed in **Draft EIR Section 3.0: Project Description Table 3-16: Proposed General Plan Permits and Approvals** (page 3-92) and **Table 3-17: BIG Permits and Approvals** (page 3-93). Per CEQA, a responsible agency should provide substantive comments, supported by specific documentation, regarding those project activities within an area of expertise of the agency or that are required to be carried out or approved by the agency. (Pub. Resources Code, § 21153(c).) Consistent with this, the City has carefully reviewed the California Department of Fish and Wildlife's comments on the Draft EIR and where necessary, revised the EIR accordingly, except as otherwise explained in the responses to comments below.

S4-1 This comment requests an extension to provide CDFW comments on the Draft EIR. See **Consolidated Response 01-02** concerning the Draft EIR public review period.

COMMENT LETTER S5

STATE CAPITOL
P.O. BOX 942849
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(916) 319-2034
FAX (916) 319-2134

DISTRICT OFFICE
41301 12TH STREET WEST, SUITE F
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Assembly
California Legislature

TOM LACKEY
ASSEMBLYMAN, THIRTY-FOURTH DISTRICT

COMMITTEES
VICE CHAIR: ELECTIONS
VICE CHAIR: GOVERNMENTAL ORGANIZATION
VICE CHAIR: PUBLIC EMPLOYMENT AND RETIREMENT
ARTS, ENTERTAINMENT, SPORTS, AND TOURISM
BUDGET
PUBLIC SAFETY
SPECIAL COMMITTEE ON LEGISLATIVE ETHICS

January 5, 2025

Mayor Silva & Councilmembers
City of Barstow
220 E. Mountain View St. A
Barstow, CA 92311

I am writing to express my strong support for the BNSF Barstow International Gateway (BIG) Project. This project represents a tremendous opportunity for Barstow—one that will create thousands of jobs and give our young people countless reasons to build their futures right here at home.

The railroad has always been an integral part of Barstow's history, with many of our early residents coming here to work for Santa Fe. The new state-of-the-art BIG facility will carry that legacy forward, attracting a new generation of workers and their families while reinforcing Barstow's role as a vital hub of commerce and industry.

S5-1

In addition to job creation, this project will generate significant economic growth, stimulate local businesses, and increase tax revenue to support essential services such as our schools, police, and fire departments.

The BNSF BIG Project is not only a sound investment—it's the right fit for our community's future. I respectfully encourage the Barstow City Council to approve this project.

Sincerely,

Thomas Lackey

Assemblyman Tom Lackey
34th District

RESPONSE TO COMMENT LETTER S5, 34th DISTRICT ASSEMBLY CALIFORNIA LEGISLATURE

S5-1 The City thanks the Assemblymen for his letter of support. See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER S6

S6

CALIFORNIA AIR RESOURCES BOARD

Gavin Newsom, Governor
Yana Garcia, CalEPA Secretary
Lauren Sanchez, CARB Chair

January 5, 2026

Chris Heldreth
Community Development Director
City of Barstow
220 East Main Street, Suite A
Barstow, California 92311
cheldreth@barstowca.org

Sent via email

Dear Chris Heldreth:

Thank you for providing the California Air Resources Board (CARB) with the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the City of Barstow General Plan (General Plan) and Barstow International Gateway Project (BIG Project or Project), State Clearinghouse No. 2024020501. The Project is located within City of Barstow (City), which is the lead agency for California Environmental Quality Act (CEQA) purposes. CARB appreciates the significant investment and opportunity that the BIG Project represents, and BNSF's commitment to reducing environmental impacts in coordination with CARB as part of the development of this DEIR. We offer the following comments in that spirit. S6-1

CARB submitted a comment letter, which is attached to this letter, on the Notice of Preparation (NOP) for the DEIR released in February 2024. CARB's letter dated May 7, 2024, highlighted the need to fully evaluate the BIG Project's air quality impacts in the DEIR, particularly for nearby disadvantaged communities. The proposed Project site is located adjacent to residential neighborhoods and Lenwood Elementary School, with some homes as close as 175 feet from the Project boundary. These communities are already burdened by multiple sources of air pollution, including emissions from the existing BNSF Barstow Railyard, Interstate 15, and State Route 58. Furthermore, CARB recommended including a mitigation measure that would ensure the BIG Project uses zero-emission switch and line-haul locomotives. It also urged the City and BNSF to implement existing and emerging zero-emission technologies to minimize exposure to diesel particulate matter (diesel PM) and oxides of nitrogen (NOx) emissions for all neighboring communities, and to minimize the greenhouse gases (GHG) that contribute to climate change. S6-2

While CARB acknowledges that the BIG Project's final design incorporates several key emission reduction measures, the City and BNSF should strive to make the Big Project as clean as possible to protect public health. The following sections set forth CARB's comments on specific aspects of the DEIR. In summary, CARB urges the City and BNSF to (1) include enforceable mitigation measures requiring the phased adoption of zero-emission locomotives and heavy-duty trucks, (2) require the use of zero-emission transport refrigeration units, (3) eliminate improperly deferred mitigation, and (4) provide substantial S6-3

arb.ca.gov 1001 I Street • P.O. Box 2815 • Sacramento, California 95812 helpline@arb.ca.gov

evidence supporting the DEIR's assumptions regarding renewable diesel emission benefits, switcher idling emissions, fuel consumption rates, and locomotive fleet projections. S6-3 cont'd.

Project Description

The BIG Project is a proposed 4,300-acre integrated rail, logistics, and warehousing complex that would function as a major inland port for freight moved by BNSF Railway from seaports to a railyard consisting of a large intermodal facility and a block-swap yard, along with up to 9 million square feet of transload warehouse space and supporting roadway, utility, and energy infrastructure.[1,2] Train activity would be substantial, with approximately 84 line-haul locomotives and 12 switchers operating daily in 2028, and increasing to 119 line-haul locomotives and 16 switchers in 2048 transporting freight between the BIG Project and the Ports of Los Angeles and Long Beach (Ports).[3] Heavy-duty truck activity at the BIG Project would start at approximately 128,000 annual container truck trips in 2028 and increase to about 200,000 by 2048.[4] S6-4

The BIG Project incorporates design features intended to reduce air quality impacts. These include exclusive use of Tier 4 switch locomotives, retirement of older switchers at the existing Barstow yard, deployment of Tier 4 line-haul locomotives between the Ports and the BIG Project, and on-site use of zero-emission electric hostlers and electric rail-mounted gantry cranes. Onsite rubber-tired gantry cranes would be hybrid diesel electric. The Project also includes a 140-acre solar farm that is expected to generate about 21 megawatts (MW) of electrical power onsite. S6-5

The City's General Plan establishes a long-term policy framework to manage citywide growth through 2048. The plan accommodates more than 6,000 new households, roughly 18,500 new residents, and approximately 15 million square feet of new non-residential development. S6-6

[1] City of Barstow. City of Barstow General Plan and Barstow International Gateway Project Draft Environmental Impact Report. November 2025. Table 3-8. Page 3-43. Accessible at: *https://www.barstowca.org/home/showpublisheddocument/10359/638987170966700000*.
[2] City of Barstow. City of Barstow General Plan and Barstow International Gateway Project Draft Environmental Impact Report. November 2025. Page 3-56. Accessible at: *https://www.barstowca.org/home/showpublisheddocument/10359/638987170966700000*.
[3] City of Barstow. City of Barstow General Plan and Barstow International Gateway Project Draft Environmental Impact Report. November 2025. Page 3-1. Accessible at: *https://www.barstowca.org/home/showpublisheddocument/10359/638987170966700000*.
[4] City of Barstow. City of Barstow General Plan and Barstow International Gateway Project Draft Environmental Impact Report. November 2025. Table 3-13. Page 3-53. Accessible at: *https://www.barstowca.org/home/showpublisheddocument/10359/638987170966700000*.

CARB Urges the City to Plan for the Use of Zero-Emission Technologies

CARB appreciates that BNSF has committed to deploying Tier 4 switch locomotives on-site and to utilizing Tier 4 line-haul locomotives to transport freight between the BIG Project site and the Ports, as well as electric infrastructure supporting electric heavy-duty trucks and equipment. These commitments represent meaningful improvements over baseline diesel locomotive operations and demonstrate a willingness by BNSF to reduce the BIG Project's air quality impacts. However, given the scale of the Project and its proximity to a disadvantaged community, the use of Tier 4 locomotives alone is not sufficient to minimize the Project's long-term air quality impacts. As presented in the Air Quality Section of the DEIR, the operation of the BIG Project would result in health risk impacts of 40 chances per million, well exceeding the Mojave Desert Air Quality Management District's (MDAQMD) 10 chances per million significance threshold.[5] As shown in the DEIR, this increase in health risk impacts is attributed to the operation of heavy-duty trucks, line-haul locomotives, and switchers operating at the BIG Project's proposed intermodal railyard. To reduce the BIG Project's impact on air quality, BNSF and the City must pursue strategies that transition the Project toward the use of zero-emission locomotives and trucks. The DEIR should therefore include a clear and enforceable project design feature or mitigation measure requiring the deployment of zero-emission line-haul locomotives, electric switchers, and zero-emission heavy-duty trucks as early as possible. S6-7

The DEIR concludes that zero-emission locomotive technologies are infeasible for the BIG Project due to current electrical constraints, charging loads, and the state of battery-electric and hydrogen locomotive development.[6] However, this determination relies almost entirely on present-day conditions and doesn't consider the Project's multi-decade lifespan. Zero-emission freight rail technology, utility infrastructure, and renewable energy generation will continue to advance, as evidenced by manufacturers, including, but not limited to, Innovative Rail Technologies, which is already producing and delivering battery-electric switch locomotives for operational use.[7] Rather than assessing the feasibility of building and expanding the necessary infrastructure over time, the DEIR assumes that today's limitations are permanent. It also treats battery-electric charging demands to S6-8

[5] City of Barstow. City of Barstow General Plan and Barstow International Gateway Project Draft Environmental Impact Report. November 2025. Table 5.3-36. Page 5.3-142. Accessible at: *https://www.barstowca.org/home/showpublisheddocument/10133/638987214365300000*.

[6] City of Barstow. City of Barstow General Plan and Barstow International Gateway Project Draft Environmental Impact Report. November 2025. Page 5.3-110. Accessible at: *https://www.barstowca.org/home/showpublisheddocument/10133/638987214365300000*.

[7] Innovative Rail Technologies. IRT Delivers First Battery-Electric Switcher to Launch Customer. July 26, 2023. Accessible at: *https://innovativerailtech.com/reducing-rail-emissions-in-california/*. Please include all evidence cited in footnotes 7 – 19, 23 *herein* in the City's administrative record for this matter. (*Consol. Irrigation Dist. v. Superior Ct.* (2012) 205 Cal. App. 4th 697, 724-25.)

accommodate electric heavy-duty trucks and locomotives as fixed, without considering strategies such as expanded on-site solar, energy storage, staggered charging, or use of hybrid-electric locomotives. Because CEQA requires a forward-looking, good-faith assessment of feasible long-term mitigation measures and alternatives, and given the Project's multi-decade lifespan, the DEIR's reliance on static present-day constraints alone does not further CEQA's goal of mitigating all potentially significant long-term impacts. S6-8 cont'd.

The DEIR's assumption that the BIG Project has maximized the allocated power budget is unsupported. The DEIR treats the current 66-megawatt (MW) power budget allocated to the BIG Project by Southern California Edison (SCE) as fixed. To meet the BIG Project's future power needs, the City and BNSF should coordinate with SCE to expand substations and secure new transmission-level service to supply more power to the BIG Project site. The DEIR itself acknowledges that transmission-level service upgrades could be pursued over a 7 to 10 year timeline but frames this timeline as a constraint rather than a feasible infrastructure pathway. Because the BIG Project will operate for many decades, coordination with SCE on substation upgrades and long-term service expansion represents a reasonable, feasible, and critically important approach to enabling future electrification. S6-9

The BIG Project can also expand its electrical capacity beyond the 160-acre solar farm already proposed. The BIG Project area possesses land, rooftops, and paved areas that could support additional solar power generation. Expanded ground-mounted solar, rooftop PV systems on warehouses and maintenance buildings, and solar canopies over parking and container staging areas could increase daytime energy availability. When paired with energy storage systems, additional solar generation would allow the Project to flatten peak loads, support charging schedules, and increase the availability of renewable power for electric heavy-duty trucks, switchers, and ultimately line-haul locomotives. S6-10

The DEIR's assertion that electric switchers are infeasible is similarly unsupported by analysis or evidence. Battery-electric switch locomotives are already commercially available. Innovative Rail Technologies sells commercially available switchers currently operating at the U.S. Steel Plant in Pennsylvania.[8] Other rail operators such as Watco, OmniTRAX, and Cando Rail have developed their own battery-electric switchers in house which are currently in use today.[9,10,11] The DEIR states that charging time and power needs preclude their use, but this conclusion is based on assumptions that all units would charge simultaneously and that the site cannot add electrical capacity. However, switcher charging demand can be S6-11

[8] Innovative Rail Technologies. IRT Locomotive Featured in US Steel TV AD. Accessible at: *IRT Locomotive Featured in US Steel TV Ad - Innovative Rail Technologies*.
[9]Railway Age. Watco Electric Switchers Receive High Marks. Accessible at: *https://www.railwayage.com/freight/short-lines-regionals/watco-electric-switchers-receive-high-marks/*.
[10]NSR AMPS Traction G90 BEL in Revenue Service. Accessible at: *https://www.railwayage.com/mechanical/locomotives/nsr-amps-traction-g9-bel-in-revenue-service/*.
[11]First Look: Cando Rail & Terminals' Battery-Electric Switcher. Accessible at: *https://www.railwayage.com/freight/switching-terminal/first-look-cando-rail-terminals-battery-electric-switcher/*.

managed through staggered charging schedules. For example, even assuming up to eight battery-electric switchers would charge concurrently, supporting their charging needs would require approximately 11 MW of additional power that can be met through expanded solar generation, energy storage integration, and coordinated SCE substation upgrades. The DEIR also does not consider that hydrogen-powered switchers and hybrid switchers, both of which eliminate or substantially reduce grid-based charging requirements, are now in active commercial deployment. For example, the Canadian National Railway Company (CN) is piloting medium-horsepower hybrid locomotive units that reduce emissions by up to 50% without any on-site charging infrastructure.[12] Canadian Pacific Kansas City Limited (CPKC) and CSX have also demonstrated multiple hydrogen fuel-cell switch locomotives capable of fast refueling and zero stack emissions.[13]

S6-11 cont'd.

The DEIR's consideration of battery-electric line-haul locomotives also relies heavily on present-day limitations. While current battery-electric line-haul units have smaller energy capacities than diesel locomotives, this technology is advancing rapidly. There are multiple strategies capable of extending the range of electric line-haul locomotives and managing energy demand. Battery-tender cars, railcars specifically designed to carry additional battery capacity, can extend line-haul locomotive range to travel from the proposed intermodal railyard to the Ports. For example, a 14 MWh battery-tender has a range of 150 miles, within the range of the Ports. Discontinuous overhead catenary systems could also be used along the Ports-to-BIG Project corridor, which can provide electrification in strategic segments of the corridor, reducing battery size requirements and eliminating the need for full-route electrification. The Federal Railroad Administration has published a cost-benefit and risk framework supporting precisely these types of partial-electrification concepts.[14] Hybrid line-haul locomotives can also be used, in which combinations of battery-electric locomotives and diesel units can deliver significant emission reductions immediately. BNSF's own Wabtec demonstration achieved an 11% fuel reduction, with potential for reductions up to 30%.[15] Hybrid-electric locomotives combine diesel and battery power in one unit, enabling zero-emission operation while reducing overall diesel use and improving fuel efficiency. They require no additional infrastructure, making them a practical and cost-effective option for near-term deployment. This technology offers significant emissions reduction potential and increased locomotive power, making it suitable, not only for the BIG captive fleet, but also scalable across BNSF's national operations. As an interim solution, hybrid-electric locomotives can deliver immediate

S6-12

[12] CN. CN Launches New Medium Horsepower Hybrid Locomotive Pilot Project. Accessible at: *https://www.cn.ca/en/news/2025/01/cn-launches-new-medium-horsepower-hybrid-locomotive-pilot-projec/*.
[13] CPKC. CP 1200 Out On the Road. Accessible at: *CPKC's High-horsepower Hydrogen Locomotive begins testing*.
[14] Federal Railroad Administration. Cost and Benefit Risk Framework for Modern Railway Electrification Options. January 2025. Accessible at: *Cost and Benefit Risk Framework for Modern Railway Electrification Options*.
[15] Freightwaves. Wabtec: Battery-electric locomotive reduces fuel use by 11%. May 17, 2021. Accessible at: *https://www.freightwaves.com/news/wabtec-battery-electric-locomotive-reduces-fuel-use-by-11*.

environmental benefits while paving the way for future zero-emission line-haul technologies. Hydrogen fuel-cell line-haul locomotives, currently being tested in revenue service by CPKC, further demonstrate the viability of long-range zero-emission freight rail.[16] S6-12 cont'd.

Zero-emission heavy-duty trucks also represent a feasible pathway for the BIG Project to reduce emissions. Battery-electric Class 8 trucks are commercially available today and are already deployed in drayage service throughout Southern California. Comprehensive listings of eligible ZE truck models are publicly available through the Hybrid and Zero-Emission Truck and Bus Voucher Incentive Program (HVIP), which also provides significant purchase incentives.[17] Additional funding can be obtained through CARB's Carl Moyer Program and Voucher Incentive Program, both of which support early adoption of zero-emission heavy-duty trucks.[18,19] The DEIR does not consider these commercially available options or the funding sources that improve mitigation measure feasibility. S6-13

Given the potential for 1) expanded on-site renewable generation, 2) energy storage integration, 3) staggered charging strategies, 4) SCE substation upgrades, and 5) rapidly advancing locomotive and truck technologies, the DEIR's mitigation measure infeasibility conclusions are not supported by adequate analysis or supporting substantial evidence. To ensure that the BIG Project meaningfully reduces emissions and protects surrounding communities, the EIR should incorporate a Project design measure or mitigation measure that includes collaboration with SCE to ensure the fastest feasible expansion of power capacity at the site and lays out a clear timeline for the phased integration of zero-emission line-haul locomotives, switchers, and heavy-duty trucks. S6-14

CARB Urges the City to Use Zero-Emission Transport Refrigeration Units within the Proposed Transload Warehouse Center

Although not explicitly stated in the DEIR's project description, the air quality analysis for the BIG Project assumes that a portion of the proposed transload warehousing would be used for cold storage.[20] According to Appendix 5.3 (Air Quality Technical Report) of the DEIR, less than 5% of containers handled at the BIG Project would have transport refrigeration units S6-15

[16] CPKC. CPKC's High-Horsepower Hydrogen Locomotive Begins Testing. Accessible at: *CPKC's High-horsepower Hydrogen Locomotive begins testing*.
[17] Zero-Emission Truck and Bus Voucher Incentive Project. Accessible at: *https://californiahvip.org/*.
[18] CARB. Carl Moyer Memorial Air Quality Standards Attainment Program. Accessible at: *https://ww2.arb.ca.gov/our-work/programs/carl-moyer-memorial-air-quality-standards-attainment-program*.
[19] CARB. On-Road Heavy-Duty Voucher Incentive Program. Accessible at: *https://ww2.arb.ca.gov/our-work/programs/road-heavy-duty-voucher-incentive-program*.
[20] City of Barstow. City of Barstow General Plan and Barstow International Gateway Project Draft Environmental Impact Report. November 2025. Page 5.3-121. Accessible at: *https://www.barstowca.org/home/showpublisheddocument/10133/638987214365300000*.

(TRU).[21] Furthermore, Mitigation Measure BIG AQ-14 (MM BIG AQ-14) requires electrical rooms at the proposed transload warehousing to hold additional panels that may be needed in the future to supply power to trailers with TRUs during the loading/unloading of refrigerated goods, suggesting that cold storage would occur.[22] If cold storage uses are allowed at the BIG Project site, trucks, trailers, and railcars visiting the Project site would likely be equipped with TRUs. Operation of TRUs on railcars, trucks and trailers can generate substantial diesel emissions while on-site.[23] Nearby residences and other sensitive receptors such as daycare centers, senior care facilities, and schools could therefore be exposed to diesel exhaust, resulting in a significant air quality impact that the DEIR fails to analyze. S6-15 cont'd.

CARB appreciates the inclusion of mitigation measure MM BIG AQ-14, however, CARB strongly recommends that all TRUs serving the Projects' proposed transload warehousing to be plug-in capable. This could be implemented through a Project design measure or mitigation measure that includes contractual language in tenant lease agreements, prohibiting the operation of diesel-powered TRUs within the proposed transload warehouse development. S6-16

The General Plan Air Quality Mitigation Measures Improperly Defer Mitigation

CARB is concerned that the DEIR improperly defers mitigation measures intended to reduce air quality impacts associated with the buildout of the proposed General Plan. Chapter 5.3 of the DEIR concludes that, by 2048, full buildout of the General Plan could generate 1,584 pounds per day of volatile organic compounds (VOC), 1,289 pounds per day of NOx, and 6,070 pounds per day of carbon monoxide (CO) from combined construction and operational activities, substantially exceeding MDAQMD significance thresholds, resulting in a significant air quality impact.[24] To address these significant adverse impacts, the DEIR proposes three mitigation measures (MM GP AQ-1 through AQ-3), each targeting different sources and phases of emissions. S6-17

[21] City of Barstow. City of Barstow General Plan and Barstow International Gateway Project Draft Environmental Impact Report. November 2025. Appendix 5.3. Page 66. Accessible at: *https://www.barstowca.org/home/showpublisheddocument/10151/638982138812870000https://www.barstowca.org/home/showpublisheddocument/10133/638987214365300000*.

[22] City of Barstow. City of Barstow General Plan and Barstow International Gateway Project Draft Environmental Impact Report. November 2025. Page 5.3-108. Accessible at: *https://www.barstowca.org/home/showpublisheddocument/10133/638987214365300000*.

[23] CARB. Staff Report: Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets, and Facilities Where TRUs Operate Initial Statement of Reasons. July 27, 2021. Appendix I. Accessible at: *https://ww3.arb.ca.gov/board/rulemaking/tru2021/appi.pdf*.

[24] City of Barstow. City of Barstow General Plan and Barstow International Gateway Project Draft Environmental Impact Report. November 2025. Page 5.3-76. Table 5.3-17. Accessible at: *https://www.barstowca.org/home/showpublisheddocument/10133/638987214365300000*.

MM GP AQ-1 addresses construction-related impacts, requiring Project applicants to prepare project-specific air quality assessments at the time that specific projects are built within the General Plan area. If these project-specific air quality assessments find that emissions would exceed MDAQMD significance thresholds, applicants must implement measures such as the use of low-emission equipment, dust control, idling restrictions, and other site management practices. S6-18

MM GP AQ-2 focuses on operational-phase impacts, requiring technical assessments for future developments. If operational emissions are found to exceed significance thresholds, mitigation measures must be implemented, including electrical hookups for trailers with TRUs, energy-efficient appliances, electric vehicle charging, and other strategies to reduce long-term emissions from both stationary and mobile sources. S6-19

MM GP AQ-3 applies to new discretionary industrial or warehousing projects or commercial land uses that would generate substantial diesel truck travel. The project applicant prepares a health risk assessment (HRA), which is evaluated by the City and the Mojave Air District. If the HRA shows that the project's incremental cancer risk exceeds ten in one million, or that the noncancer hazard index exceeds 1.0, the "project applicant shall identify and demonstrate" that measures are capable of reducing potential cancer and noncancer risks to an "acceptable" level to the extent feasible, including appropriate enforcement mechanisms. Measures to reduce risk impacts may include but are not limited to measures such as dock electrification, newer low-emission equipment, and off-site truck routing. Even with these three measures, the DEIR concludes that the General Plan's air quality impacts would remain significant and unavoidable. S6-20

CEQA allows deferral of mitigation only under narrow circumstances and with strict safeguards. The CEQA Guidelines are clear: agencies may not defer formulation of mitigation measures until a future time, though specific details may be developed post-approval when (1) the agency commits to the mitigation, (2) the agency adopts specific performance standards, and (3) the agency identifies the types of actions that could feasibly achieve those standards. (Cal. Code Regs, tit.14, § 15126.4(a)(1)(B).) S6-21

MM GP AQ-3 is particularly problematic. Here the project applicant prepares the HRA and follows its recommendations. While the City and MDAQMD can evaluate the report, the government agencies are not permitted to modify or reject its analysis or proposed mitigations. "An agency goes too far when it simply requires a project applicant to obtain a ... report and then comply with any recommendations that may be made in the report." (*POET, LLC v. State Air Res. Bd.* (2013) 218 Cal. App. 4th 681, 736 *citing Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 793.) Further, MM GP AQ-3 does not require that significant impacts be lowered to a level of insignificance, only that measures are capable of reducing potential cancer and noncancer risks to an "acceptable" level. S6-22

MM GP AQ-1 through AQ-3 also rely heavily on subjective approval by a single staff member based on discretionary criteria such as "substantial evidence as determined by the S6-23

Planning Division" or actions taken "to the satisfaction" of staff. Such discretionary, post-hoc decision making circumvents CEQA's requirement that mitigation be vetted through public environmental review. (See *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 307.) S6-23 cont'd.

Moreover, MM GP AQ-3 does not commit the City to implementing feasible mitigation. Although the proposed measure lists examples of potential emission-reduction strategies, it does not require any specific actions, nor ensure that mitigation is enforceable through binding conditions such as tenant leases. MM GP AQ-3 requires only that measures identified in the project applicant's HRA are identified as mitigation measures in the environmental document and may or may not be incorporated into the site development plan as a component of the proposed project and are not required to be included in the conditions of approval. Without guaranteed incorporation of mitigation requirements into future approvals and lease agreements, these proposed mitigation measures lack enforceability as required by CEQA. (Cal. Code Regs, tit.14, § 15126.4(a)(1)(B), (a)(2).) S6-24

CARB Urges the Adoption of Additional Measures to Mitigate the General Plan's Significant Adverse Air Quality Impacts

As previously discussed in this letter and in CARB's letter submitted on the NOP, the future development within the proposed General Plan proposes the buildout of approximately 15 million square feet of non-residential development (e.g., industrial development), which will likely be constructed near existing residential neighborhoods already burdened by multiple sources of air pollution and Lenwood Elementary School. To reduce the General Plan's air quality impacts to these communities and schools, and to meaningfully reduce the General Plan's significant adverse project-specific and cumulative air quality impacts, CARB urges the City to adopt additional, mandatory mitigation measures. S6-25

At a minimum, CARB recommends adopting the following additional measures for all developments in the General Plan:

Construction Phase (mandatory measures):

- Prohibit unnecessary idling of diesel equipment;
- Require electrical hookups for battery/electric tools;
- Require Tier 4 (or equivalent retrofit) off-road diesel engines for all construction equipment where available;
- Require battery-electric or plug-in electric power where feasible for off-road equipment under 19 kW (e.g., compactors, pressure washers);
- Require model-year 2014 or newer heavy-duty trucks for construction access meeting CARB's lowest optional NOx standard; S6-26

- Include contract provisions requiring contractors to comply with all equipment and vehicle standards.

Operation Phase (mandatory measures):

- Require zero-emission heavy-duty trucks for industrial uses and include enforceable tenant-lease provisions;
- Require plug-in capability for all electric TRU-ready loading docks;
- Require all TRUs serving industrial areas to be plug-in capable and require that they use electric power while at loading docks;
- Limit onsite diesel idling (e.g., ≤2 minutes) through enforceable lease or contract terms;
- Ensure adequate onsite charging/fueling infrastructure (space, electrical capacity, metering) to support equipment and heavy-duty trucks.

S6-27

The DEIR Fails to Formulate and Evaluate Mitigations to Address the General Plan's Significant Cumulative Air Quality Impacts

The DEIR acknowledges that Project cumulative impacts would be significant but fails to formulate and analyze mitigation measures to address these cumulative impacts. The DEIR states that several projects built over the life of the proposed General Plan would nonetheless contribute to higher levels of cancer risk in the MDAB and therefore result in a cumulatively considerable impact.[25] Likewise, the DEIR notes that cumulative impacts are conservatively assumed to be significant, given multiple projects could be constructed and operated in close proximity to each other.

S6-28

The DEIR fails to formulate and analyze mitigation measures to address these significant cumulative impacts. The DEIR only notes that buildout of the proposed General Plan would be subject to MM GP AQ-1 (construction emissions analysis), MM GP AQ- 2 (operational emissions analysis), and MM GP AQ-3 (operational health risk assessment). There is no DEIR evaluation of mitigation measures to address acknowledge significant cumulative air quality impacts. "This obligation to describe mitigation measures is one of the procedural requirements of CEQA 'intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects.'" (*POET, LLC v. State Air Res. Bd.* (2013) 218 Cal. App. 4th 681, 735, citing Pub. Res. Code § 21002.)

S6-29

[25] City of Barstow. City of Barstow General Plan and Barstow International Gateway Project Draft Environmental Impact Report. November 2025. Page 6-17. Accessible at: *https://www.barstowca.org/home/showpublisheddocument/10399/638987217463730000*.

Further, these three air quality mitigation measures involve only individual project-level assessments and a perfunctory listing of possible measures. Moreover, even the individual project-level assessments are only triggered if a project has the potential to exceed the Mojave air districts significance thresholds. The incremental but cumulatively significant impact of projects that do not meet these thresholds will never be analyzed according to the DEIR. S6-30

CARB is concerned that because many future projects under the General Plan will be individually too small to exceed MDAQMD thresholds, the City's approach leaves the General Plan's cumulative air quality impacts unmitigated. CEQA requires mitigation of potentially significant cumulative air quality impacts resulting from reasonably foreseeable General Plan buildout. As currently drafted, this DEIR fails to do so. S6-31

The DEIR May Underestimate the BIG Project's Locomotive-Related Emissions

CARB is concerned that the DEIR may underestimate air pollutant emissions from the BIG Project because the DEIR relies on modeling assumptions that have not been adequately supported and need to be clarified in the FEIR. One key issue is the DEIR's use of a single, across-the-board percentage reduction to reflect renewable diesel (RD) use. According to Appendix 5.3 (Air Quality Technical Report) of the DEIR, BNSF plans to increase the RD blend at its Southern California fueling sites from 1% to 10% and to operate all Tier 4 line-haul and switch locomotives on a 10% RD blend.[26] The DEIR assumes the emissions benefit from RD as a simple linear interpolation of a 100% RD blend. For example, the DEIR assumes 10% blend achieves 10% of the benefit of full RD. The DEIR fails to include substantial evidence supporting the assumption of a linear emissions benefit from RD. S6-32

While renewable diesel can reduce air pollutant emissions, the size of the reduction depends heavily on the locomotive tier. Older Tier 0–2 locomotives tend to see the largest improvements because they lack advanced emission controls, whereas newer Tier 4 locomotives see only modest additional reductions. Although Tier 4 engines still have the lowest emissions overall, the effect of RD is not uniform across engine types. Because RD does not yield the same level of emission reductions across all locomotive tiers, BNSF should not apply a single blanket reduction factor. S6-33

The DEIR may also underestimate emissions from switch locomotives idling within the proposed railyard. Based on CARB's review of the air quality analysis presented in Appendix 5.3 (Air Quality Technical Report) of the DEIR, air pollutants emitted during the idling of switch locomotives within the proposed railyard were estimated using U.S. EPA S6-34

[26] City of Barstow. City of Barstow General Plan and Barstow International Gateway Project Draft Environmental Impact Report. November 2025. Appendix 5.3. Page 9. Accessible at: *https://www.barstowca.org/home/showpublisheddocument/10151/638982138812870000https://www.barstowca.org/home/showpublisheddocument/10133/638987214365300000*.

emission factors for locomotives (EPA-420-F-09-025). Since the emission factors are averaged across representative engines within each tier and weighted by their typical operating modes and activity levels, the DEIR should not be using aggregated emission factors to estimate emissions from switchers idling within the proposed railyard. CARB urges the DEIR to use idling emission factors developed by the manufacturer of the switchers that will be operating at the BIG Project site. S6-34 cont'd.

The estimated fuel consumption of switch locomotives operating within the proposed railyard appears inconsistent with the values used in the BIG Project's air quality analysis. Table 3-10 of the DEIR (BIG Estimated Switcher Locomotive Fueling Events) indicates that switchers would be refueled at an average rate of 247 gallons per day. In contrast, the air quality analysis assumes much higher fueling rates: 3,333 gallons per day in 2028, 3,708 gallons per day in 2033, and 7,120 gallons per day in 2048. It remains unclear how much of this fuel would be consumed by switchers within the proposed railyard. S6-35

CARB is concerned that BNSF may shift air-pollutant emissions from other rail facilities to support the BIG Project. As described in Section 3.0 (Project Description), the BIG Project proposes operating 84 Tier 4 line-haul and 12 Tier 4 switch locomotives beginning in 2028, increasing to 119 line-haul and 16 switch locomotives by 2048.[27] Although the DEIR states that these locomotives would be new, it does not clarify whether they would be sourced from existing rail facilities in California or other states. Consequently, CARB is concerned that the locomotives identified for the BIG Project could be drawn from other rail facilities within California, which might then replace them with lower-tier locomotives. If the proposed Tier 4 line-haul and switch locomotives would in fact be displaced from other rail facilities, the DEIR project description must disclose this. Further the DEIR is required to evaluate the resulting indirect air-quality impacts associated with the continued or increased use of lower-tier locomotives at those other rail facilities. A project under CEQA is an activity that may either cause a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment. (Pub. Res. Code § 21065.) Indirect or secondary effects are caused by the project and farther removed in distance but are reasonably foreseeable. (Cal. Code Regs, tit. 14, § 15358, subd. (a)(2).) S6-36

Finally, the DEIR's assumptions regarding captive fleet locomotive population are unclear and appear inconsistent. The projected fleet decreases from 30 locomotives in 2028 to 25 in 2033, then rises to 38 in 2048. The rationale for this fluctuation is not explained in the DEIR. S6-37

[27] City of Barstow. City of Barstow General Plan and Barstow International Gateway Project Draft Environmental Impact Report. November 2025. Table 3-11. Page 3-49. Accessible at: *https://www.barstowca.org/home/showpublisheddocument/10359/638987170966700000:*

Conclusion

The development of a new rail facility offers the City and BNSF a chance to generate employment for Californians and to establish a cutting-edge, zero-emission rail facility that could set a standard for future projects throughout California. To better protect nearby communities, including sensitive receptors such as schools and disadvantaged neighborhoods, the EIR should include enforceable mitigation measures, use accurate site-specific emission factors, and provide a clear plan for phasing in zero-emission locomotives, trucks, and transport refrigeration units. The EIR should also provide substantial evidence for air quality emission benefits of RD, switcher emission factors, and should explain or correct switcher fuel consumption rate inconsistencies. S6-38

Given the breadth and scope of projects subject to CEQA review throughout California that have air quality and greenhouse gas impacts, coupled with CARB's limited staff resources to substantively respond to all issues associated with a project, CARB must prioritize its substantive comments here based on staff time, resources, and its assessment of impacts. CARB's deliberate decision to substantively comment on some issues does not constitute an admission or concession that it substantively agrees with the lead agency's findings and conclusions on any issues for which CARB does not submit substantive comments. S6-39

CARB appreciates the opportunity to comment on the DEIR for the General Plan and BIG Project and can provide assistance with emission reduction strategies, as needed. Please include CARB on your list of selected State agencies that will receive the FEIR. If you have questions, please contact Stanley Armstrong, Air Pollution Specialist, via email at *stanley.armstrong@arb.ca.gov* S6-40

Sincerely,



Matthew O'Donnell, Chief, Risk Reduction Branch

cc: State Clearinghouse
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Stanley Armstrong, Air Pollution Specialist, Risk Reduction Branch, CARB

RESPONSE TO COMMENT LETTER S6, CARB

S6-1 Commenter raises some concerns about the Draft EIR's analysis that are best addressed by sharing technical and scientific information, which is provided below. This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below. See also **Consolidated Response 04** concerning general non-CEQA issues.

S6-2 **Draft EIR Section 5.3: Air Quality** (page 5.3-58) acknowledges that BIG is adjacent to SB 535 designated disadvantaged communities. It is noted that SB 535 does not include project specific requirements or prohibit developments in proximity to a designated community. However, **Draft EIR Section 5.3** (pages 5.3-124 through 5.3-135) analyzes localized impacts to nearby sensitive receptors (including disadvantaged communities and Lenwood Elementary School). Additionally, **Draft EIR Section 5.3** (pages 5.3-137 through 5.3-161) evaluates health risk impacts to sensitive receptors.

As part of BNSF's evaluation and engineering design of BIG facility, BNSF considered the potential for maximum electrification of operations at the facility. The ultimate ability to implement electrification of operations was dependent on two variables: (1) availability of power and (2) viability of electrical equipment. With regard to the former, see *A Power Plan for Barstow International Gateway*, Burns & McDonnell, March 2026. With regard to the latter, BNSF evaluated for the maximum use electrified equipment for the facility and incorporated all feasible technology as part of BIG, including zero-emission widespan cranes, forklifts, top picks/side loaders, and hostlers. As shown in **Consolidated Response 12-03**, these commitments to zero-emission technologies are binding and enforceable. Other electrified equipment were considered but deemed infeasible. See **Consolidated Response 05** concerning feasible and enforceable mitigation including applicable legal standards, **Consolidated Response 05-06** concerning the feasibility of specific technology (e.g., specific zero-emission technologies raised by commenter) and other mitigation measures; and **Consolidated Response 11** concerning the power budget.

As disclosed in the Draft EIR, BIG would result in a net reduction in GHG emissions compared to existing and foreseeable baseline conditions. The Draft EIR quantified BIG's construction and operational GHG emissions and evaluated emissions reductions resulting from goods-movement efficiency, reductions in truck miles traveled (TMT), cleaner locomotive fleets, electrified equipment, renewable energy generation, and other Project features (see **Draft EIR Section 5.8: Greenhouse Gas Emissions** and **Draft EIR Appendix 5.8 BIG-1 Greenhouse Gas Emissions Assessment**).

The Draft EIR demonstrates that with mitigation, BIG would result in net GHG reductions and would not exceed the applicable zero-net-increase significance threshold (**Draft EIR Table 5.8-12**: **BIG GHG Emissions** (pages 5.8-62 through 5.8-63)). Specifically, **Draft EIR Table 5.8-12** shows that mitigated BIG GHG emissions are negative in the Opening Year (2028), Interim Year (2033), and Horizon Year (2048), confirming that BIG is a net GHG-reduction project.

The Draft EIR evaluated localized air quality impacts, including emissions of oxides of nitrogen (NO_X), to nearby sensitive receptors using dispersion modeling and accepted regulatory methods (see **Draft EIR Section 5.3: Air Quality** and **Draft EIR Appendix 5.3 BIG 1 Air Quality Technical Report**). Localized operational concentrations were modeled using AERMOD and compared against the applicable California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS) see (**Draft EIR Table 5.3-31: Maximum Off-Site Concentration from Operations (Mitigated)** (page 5.3-129) through **Table 5.3-34: Corridor – MDAQMD East of BIG Segment Operations** (page 5.3-134)). As shown in **Draft EIR Table 5.3-31** through **Table 5.3-34**, mitigated operational pollutant concentrations would not exceed applicable CAAQS or NAAQS.

The Draft EIR also incorporated all feasible project specific mitigation measures to reduce localized emissions from BIG construction and operations. Specifically, **MM BIG AQ-1**, and **MM BIG AQ-3** through **MM BIG AQ-6** would reduce construction PM_{10} and $PM_{2.5}$ emissions and require fugitive dust controls, Tier 4 equipment, use of renewable diesel, clean on-road construction vehicles, and concrete batch plant emissions controls. **MM BIG AQ-2** requires all architectural coatings to be super-compliant low VOC paints, consisting of no more than 10 grams per liter of VOC. **MM BIG AQ-3** requires construction equipment to meet CARB Tier 4 Final emissions standards and **MM BIG AQ-4** requires the use of renewable diesel fuel during construction. Furthermore, **MM BIG AQ-5** requires on-road construction trucks to have an average fleet mix of model year 2010 or newer (no less than the average fleet mix for the current calendar year as set forth in the EMFAC2021 database) and **MM BIG AQ-6** requires emissions controls for concrete batch plants such as reduction of fugitive dust.

Additionally, BIG operations would be required to implement **MM BIG AQ-7** through **MM BIG AQ-14**, which require on-site sweeping of paved areas, renewable diesel for RTG cranes, truck idling limits and truck route signage, Tier 4 emergency backup generators, and truck efficiency measures such as compliance with CARB's Carl Moyer Efficiency Program and U.S. EPA's Smart Way Program, electric landscaping equipment, electric truck charging stations, and future EV charging infrastructure. Implementation of these mitigation measures would reduce construction and operational emissions. With implementation of these measures, localized pollutant concentrations (including NO_X, PM_{10}, and $PM_{2.5}$ concentrations) would not exceed the CAAQS or NAAQS and impacts would be less than significant (Draft EIR pages 5.3-130 through 5.3-135).

See **Consolidated Response 05** concerning feasible and enforceable mitigation including applicable legal standards and **Consolidated Response 05-06** concerning the feasibility of specific technology (e.g., specific zero-emission technologies raised by commenter) and other mitigation measures.

Further, CEQA requires inclusion of "feasible" mitigation, not "emerging" technologies as suggested by commenter. Additionally, BNSF has entered into a Memorandum of Understanding with MDAQMD to implement a demonstration program testing five hybrid diesel electric linehaul locomotives that consume less fuel and generate lower emissions than traditional diesel locomotives during mainline operations, to determine if hybrid locomotives

could become feasible. These locomotives also have the ability to operate in zero emissions mode when near BIG or at the BIG rail yard. However, given it is unknown and thus speculative whether the demonstration program would be accomplished and would reduce impacts, the demonstration program is not mitigation under CEQA and the Draft EIR did not take credit for these emissions reductions. Additionally, BNSF has entered into a Memorandum of Understanding to engage in good faith with CARB to explore currently infeasible technologies and other methods that could potentially further reduce emissions. The CARB Memorandum of Understanding is not mitigation under CEQA and the Draft EIR does not take credit for potential emissions reductions. As noted in the *Governor's Certification for Judicial Streamlining of the Barstow International Gateway Project in the County of San Bernardino,*[1] "The Project Applicant has entered into a Memorandum of Understanding (MOU) with [MDAQMD] executed on February 23, 2026…and with [CARB] executed April 23, 2026… to implement a demonstration project of hybrid battery electric locomotive technology ("Pilot") as part of the Project." Thus, the Draft EIR carefully considered emission-reducing measures and implemented all feasible mitigation measures.

This MOU is consistent with commenter's request to evaluate zero-emission locomotive alternatives.

S6-3 This comment generally summarizes the topics of the comments later in the letter. Responses to the comments contained in this letter are provided below. Specifically, see **Responses S6-7**, **Response S6-13**, and **Response S6-14** concerning Zero Emission (ZE) locomotives, **Response S6-15** concerning battery tender cars, **Response S6-8** regarding ZE heavy-duty trucks, **Response S6-19** and **S6-20** regarding ZE Transport Refrigeration Units (TRUs), and **Response S6-25** concerning General Plan mitigation. Additionally, see **Response S6-35** concerning renewable diesel emission benefits, **Response S6-37** concerning switcher idling emissions, **Response S6-38** for fuel consumption rates, and **Response S6-40** concerning locomotive fleet projections. See **Consolidated Response 05-06** concerning the feasibility of specific technology and other mitigation measures.

S6-4 This comment includes a summary of the proposed BIG Project and does not raise an environmental issue or a substantive issue on the content of the Draft EIR. See **Responses S6-7** through **S6-43.**

S6-5 This comment includes a summary of the proposed BIG Project and does not raise an environmental issue or a substantive issue on the content of the Draft EIR. See **Responses S6-7** through **S6-43**.

S6-6 This comment includes a summary of the proposed General Plan and does not raise an environmental issue or a substantive issue on the content of the Draft EIR. See **Responses S6-7** through **S6-43**.

S6-7 See **Response S6-02.** See also **Consolidated Response 05** concerning feasible and enforceable mitigation including applicable legal standards and **Consolidated Response 05-06** concerning

[1] Submitted into the administrative record to the City on May 1, 2026.

the feasibility of specific technology (e.g., specific zero-emission technologies raised by commenter) and other mitigation measures. See also **Consolidated Response 16** concerning BESS.

S6-8 See **Response S6-02.** See also **Consolidated Response 05** concerning feasible and enforceable mitigation including applicable legal standards and **Consolidated Response 05-06** concerning the feasibility of specific technology (e.g., specific zero-emission technologies raised by commenter) and other mitigation measures. Further, CEQA requires inclusion of "feasible" mitigation, not future "deployment" of technologies deemed infeasible. BIG-related emissions and health risk are presented and analyzed in **Draft EIR Section 5.3: Air Quality** (pages 5.3-124 through 5.3-135). Additionally, the context of health risk thresholds is provided on **Draft EIR Section 5.3** (pages 5.3-137 through 5.3-139). As described in the Draft EIR, the 10 in a million threshold is a level for public notification under California's Air Toxics Act whereas 100 in a million is considered a "significant risk" by the Mojave Desert Air Quality Management District (MDAQMD). Projects that exceed the 100 in a million threshold require a risk reduction plan. The MDAQMD risk reduction plan is a formal document required for facilities that exceed 100 in a million health risk thresholds. It identifies the sources and causes of these emissions and outlines the specific control measures, such as process changes or technology upgrades, that would be implemented to reduce health risks to acceptable levels within a set timeframe. As noted in the comment and the Draft EIR, BIG health risk would be below 100 in a million, thus not requiring a risk reduction plan. Notably, the 10 in a million individual project health risk level assessed to BIG in the Draft EIR is conservative and protective of public health. When expressed as a probability, the 10 in a million threshold is 0.001 percent and the 250,000 in a million background risk is 25 percent.[2]

S6-9 See **Response S6-7** concerning the feasibility of zero-emission technologies for locomotives. See also **Consolidated Response 05-06** concerning the feasibility of specific technology and other mitigation measures. And see **Consolidated Response 16** concerning BESS.

S6-10 CEQA requires an assessment of potential mitigation that is capable of being successfully implemented within a reasonable period of time. CEQA does not require mitigation measures that are not operationally, practically, and otherwise feasible within a reasonable period of time. Courts have not required agencies to include long-term mitigation measures, demonstration projects, or phased-in mitigation measures that depend on evolving feasibility. (State CEQA Guidelines § 15126.4(a)(1)(B)) See **Consolidated Response 05-03** concerning a reasonable period of time.

Innovative Rail Technologies' locomotives are serviceable in the specific applications they are being deployed in, but as of now, are far smaller than would be needed for a Class I railroad. As discussed in **Draft EIR Section 5.3** (pages 5.3-108 through 5.3-115) and in **Consolidated Response 05-06,** concerning the feasibility of specific technology and other mitigation measures, additional mitigation measures for BIG were considered but determined not to be

[2] The 250,000 in a million overall chance of contracting cancer from all sources may also be a conservative. The South Coast AQMD's Multiple Air Toxics Exposure Study V (August 2021) notes that in the U.S. population, the chances of developing cancer over a lifetime is 38.4 percent. This translates into a risk of about 384,000 in a million over a lifetime.

feasible within a reasonable period of time. The Draft EIR complies with CEQA's requirements for evaluation of feasible mitigation measures and alternatives and does not improperly assume that present-day limitations are permanent. CEQA requires a good faith evaluation of feasible mitigation measures and alternatives capable of being successfully implemented at the scope and scale of the project within a reasonable period of time. (State CEQA Guidelines §§ 15126.4(a), 15126.6). CEQA does not require a lead agency to redesign a project based on technologies that are speculative, not commercially ready, or otherwise infeasible within a project's planning horizon. See **Consolidated Response 05** concerning feasible and enforceable mitigation including applicable legal standards and **Consolidated Response 05-06** concerning the feasibility of specific technology (e.g., the specific zero-emission technologies raised by the commenter) and other mitigation measures.

The Draft EIR's Energy and Greenhouse Gas analyses are explicitly forward-looking, evaluating operations through horizon year 2048 and incorporating evolving regulatory requirements, fuel standards, and equipment turnover assumptions (**Draft EIR, Section 5.6.3**, pages 5.6-30 - 5.6-36; **Draft EIR Section 5.8.6**, pages 5.8-56 through 5.8-61). These sections disclose that energy demand and emissions were modeled using conservative but reasonable assumptions to avoid understating impacts, consistent with CEQA requirements. CEQA does not require the EIR to speculate about the future deployment, scale, or performance of technologies beyond what is reasonably foreseeable or supported by substantial evidence. The Draft EIR therefore evaluates energy infrastructure, charging demand, and renewable generation based on commercially demonstrated and enforceable Project features, rather than hypothetical future expansions. Although additional power is not needed to accommodate all feasible zero-emission technologies, battery charging and storage and renewable energy expansions to power capacity were considered as set forth in *A Power Plan for Barstow International Gateway*, Burns & McDonnell, March 2026.

Even substantial expansion of on-site solar would not provide the firm, high-load, around-the-clock power necessary to support battery-electric freight locomotives at BIG. Additionally, CEQA does not require the EIR to assume a fundamentally different energy system than the one proposed, particularly when doing so would require land conversion, infrastructure expansion, and system redesign that are not part of the BIG Project Description (**Draft EIR Section 3.7**, pages 3-42 through 3-94). See also *A Power Plan for Barstow International Gateway*, Burns & McDonnell, March 2026.

Additionally, BNSF has entered into a Memorandum of Understanding with MDAQMD to implement a demonstration program testing five hybrid diesel electric linehaul locomotives that consume less fuel and generate lower emissions than traditional diesel locomotives during mainline operations, to determine if hybrid locomotives could become feasible. These locomotives also have the ability to operate in zero emissions mode when near BIG or at the BIG rail yard. However, given it is unknown and thus speculative whether the demonstration program would be accomplished and would reduce impacts, the demonstration program is not mitigation under CEQA and the Draft EIR did not take credit for these emissions reductions. Additionally, BNSF has entered into a Memorandum of Understanding to engage in good faith

with CARB to explore currently infeasible technologies and other methods that could potentially further reduce emissions. The CARB Memorandum of Understanding is not mitigation under CEQA and the Draft EIR does not take credit for potential emissions reductions. As noted in the *Governor's Certification for Judicial Streamlining of the Barstow International Gateway Project in the County of San Bernardino*[3], "The Project Applicant has entered into a Memorandum of Understanding (MOU) with [MDAQMD] executed on February 23, 2026…and with [CARB] executed April 23, 2026… to implement a demonstration project of hybrid battery electric locomotive technology ("Pilot") as part of the Project." Thus, the Draft EIR carefully considered emission-reducing measures and implemented all feasible mitigation measures.

S6-11 See **Consolidated Response 05** concerning feasible and enforceable mitigation. CEQA does not require that a Project include infrastructure, such as expanded substations and new transmission-level service, to support infeasible mitigation measures.[4] The zero-emission technologies that would be serviced by this infrastructure are infeasible, as explained in **Consolidated Response 05-06,** concerning the feasibility of specific technology (e.g., specific zero-emission technologies raised by the commenter) and other mitigation measures.

See **Consolidated Response 05** concerning feasible and enforceable mitigation including applicable legal standards, **Consolidated Response 05-06** concerning the feasibility of specific technology (e.g., specific zero-emission technologies raised by commenter) and other mitigation measures, and **Consolidated Response 05-03** concerning a reasonable period of time for feasible mitigation measures. See **Consolidated Response 11** concerning energy and power supply, and the *BEL and Catenary Feasibility Report*, and *Power Swapping Memorandum* concerning operational challenges.

S6-12 BIG's planned IMF solar farm is already at the maximum size allowed by SCE's policy due to the NBT's restriction that systems interconnecting via this pathway cannot produce more than 100% of the electricity that the customer would consume in a calendar year; see the *A Power Plan for the Barstow International Gateway*, Burns & McDonnell, March 2026 (Power Plan) for further substantiation of how the power budget is dictated by SCE regulations. Further, as described in **Draft EIR Section 5.3** (page 5.3-11), expanding the proposed solar farm would not be economically and operationally feasible. The additional cost to produce additional solar generation would not enable BNSF to go beyond the 66 MW power budget, as solar does not generate energy during nighttime. Cloud cover or other weather conditions could also reduce the energy generation during daytime. Because BIG would operate 24 hours per day, BIG must consider only power from the grid as the power budget, and then it would supplement this power with energy from solar during the daytime when solar resources are plentiful.

It is noted that rooftop solar is required on certain structures at BIG, such as the transload warehouse center, per California Code of Regulations (CCR), Title 24 (California Building

[3] Submitted into the administrative record to the City on May 1, 2026.
[4] Operational and Economic Feasibility for BEL Switchers and Linehauls, Burns & McDonnell, et al., March 13, 2026 (BEL Economic Feasibility Memorandum).

Standards Code) Energy Efficiency Standards for Non-residential Buildings (CCR, Title 24, Part 6). Title 24 Energy Efficiency Standards (§ 110.10) require buildings to be designed to have 15 percent of the roof area "solar ready" that would structurally accommodate later installation of rooftop solar panels.

Additionally, the Draft EIR includes mitigation requiring additional solar/on-site renewable electricity generation. **MM BIG EN-1** (see **Draft EIR Section 5.6: Energy** page 5.6-45) requires rooftop solar panel installation for the 9 million-square-foot warehouse building area. These panels are expected to generate approximately 17 megawatts direct current (MWdc). Furthermore, **MM BIG EN-2** (see **Draft EIR Section 5.6: Energy** page 5.6-46) requires intermodal facility structures and transload facilities to meet CALGreen Tier 2 voluntary standards.

S6-13 CEQA allows, and in fact requires, lead agencies to find such alternatives infeasible when substantial evidence shows that economic, infrastructural, or technological considerations prevent implementation "in a successful manner within a reasonable period of time." (State CEQA Guidelines §§ 15364, 15126.6, 15091.)

See **Consolidated Response 05** concerning feasible and enforceable mitigation including applicable legal standards and **Consolidated Response 05-06** concerning the feasibility of specific technology (e.g., specific zero-emission BEL switcher technologies raised by commenter) and other mitigation measures. Infeasibility regarding power demand is substantiated in the *Power Demand Memorandum*, lack of commercial readiness is substantiated in the *BEL and Catenary Feasibility Report*, and operational challenges are documented in the *Power Swapping Memorandum*. These reports supplement and support the finding of infeasibility contained in the Draft EIR, and provide additional detail supporting that charging requirements would render BEL switchers infeasible.

See also *Feasibility Analysis of New Propulsion Locomotive Technologies and Overhead Catenary for the BIG Project,* Prepared by Michael E. Iden. P.E., dated March 2026 (*BEL and Catenary Feasibility Analysis*.) For a project the size and operational intensity of BIG, hydrogen fuel-cell switchers and diesel-battery hybrid switchers are not feasible within a reasonable timeframe when economic, technological, safety/codes, and infrastructure constraints are considered under CEQA. Hydrogen switchers are limited to early prototypes and short-line pilots requiring new hazardous-fuel production, storage, and megawatt-class dispensing infrastructure that does not exist at BIG and would entail multi-year permitting and construction. Hybrids remain diesel-dependent and are themselves in pilot stages for Class I yard duty. Because commercially available hybrids have low power capacity, their zero-emission functions are limited. In practice, including hybrid switchers in diesel-hybrid consists (as would be required operationally), would require smaller trains or more switchers in total. See **Consolidated Response 05-06** concerning the feasibility of specific technology (e.g., specific hybrid locomotive technologies raised by commenter) and other mitigation measures.

Under CEQA, feasible mitigation must be "capable of being accomplished in a successful manner within a reasonable period of time," considering economic, environmental, legal,

social, and technological factors (State CEQA Guidelines §§ 15126.4(a)(1), 15364) and an EIR is not required to adopt speculative or infeasible mitigation measures, and a lead agency may properly rely on these feasibility constraints in determining that additional mitigation is not required (State CEQA Guidelines §§ 15126.4(a)(1), 15091(a)(3)). Furthermore, as detailed in *BEL and Catenary Feasibility Analysis*, the improvement from Tier 4 locomotives to zero emission would result in less than 1% reduction in pollutant concentrations compared to the high reductions already achieved through Tier 4. Under CEQA, mitigation measures are also required to be "roughly proportional" to the significant impacts found in an EIR (State CEQA Guidelines § 15126.4(a) (4&5)). Here, the benefits are marginal.

The pilots and demonstrations cited in the comment do not represent a deployable Class I fleet. In California, Sierra Northern Railway (a short line) only recently completed first testing of a hydrogen fuel-cell switcher built with CEC grant support; revenue demonstration is just beginning and commercialization is prospective. This is not a Class I fleet deployment at a 24/7 rail terminal.[5,6]

In North America's freight sector, the most advanced hydrogen work has been by Canadian Pacific Kansas City (CPKC), focused primarily on line-haul prototypes and a limited switcher, supported by tailored fueling in Calgary/Edmonton. However, this is pilot infrastructure created specifically for the tests.[7,8] An alternative still in pilot or prototype phase for other operators is speculative for BIG's immediate needs and therefore not a required feasible alternative (see State CEQA Guidelines §15126.6).

Hydrogen-powered locomotives would also create significant new hazards and footprints associated with fueling and storage infrastructure. Hydrogen facilities must comply with evolving NFPA 2 Hydrogen Technologies Code (and jurisdiction-adopted fire codes). Setback/separation distances for gaseous or liquid hydrogen storage and dispensers are consequence-based and can be substantial; recent Sandia National Laboratories work documents the technical basis for exposure distances for liquid hydrogen and the need for rigorous consequence analyses. These requirements materially impact siting in a busy railyard like BIG.[9,10] The U.S. Department of Energy's (DOE) Hydrogen Safety, Codes & Standards program recognizes that hydrogen deployment depends on codified Regulations Codes and Standards and continued data-driven revisions (i.e., the regulatory basis is still maturing, adding project schedule and cost uncertainty).[11]

Rail-scale hydrogen fueling requires high-throughput gaseous transfer and large on-site storage; DOE/NREL research is still developing and validating heavy-duty fast-flow protocols and componentry.[12] Sandia's Rail Refueling analyses show that rail stations need sizeable

5 https://www.energizeinnovation.fund/projects/sierra-northern-hydrogen-locomotive-project.
6 https://www.railway-technology.com/news/sierra-northern-railway-locomotive/.
7 https://www.cpkcr.com/en/sustainability/Hydrogen-locomotive-program.
8 https://blog.ballard.com/rail/cpkc-expands-ballard-powered-hydrogen-locomotive-fleet.
9 https://www.osti.gov/servlets/purl/2369640.
10 https://content-cdn.sessionboard.com/content/eKtMj4MNSd66pkefjFWs_POWERGEN%202024%20NFPA%202%20Presentation_POWER%20Engineers.pdf.
11 https://www.energy.gov/sites/default/files/2024-05/hfto-mypp-safety-codes-standards.pdf.
12 https://www.energy.gov/sites/default/files/2022-12/h2iq-121922.pdf.

compression, storage, and dispensing systems; site footprint and cost are dominated by storage volumes and code separation distances.[13]

Off-site supply by tube trailers carries limited payloads (hundreds of kilograms per trailer), requiring frequent deliveries for a multi-switcher Class I yard; while higher-pressure trailers (e.g., 500–900+ bar) are emerging, they are specialized and do not eliminate large-scale storage/footprint needs on site.[14,15,16]

Even when feasible, developing a hydrogen production or bulk storage/dispenser installation in California involves multi-year environmental, fire-code, hazardous materials, and utility processes, especially when setbacks, safety systems, and heavy-duty flowrates are involved (as reflected in NFPA 2 adoption materials and DOE/Sandia workshop proceedings). These timelines far exceed the near-term schedule for BIG; see **Consolidated Response 05-06** concerning the feasibility of specific technology and other mitigation measures. At BIG's required scale, hydrogen switchers are not yet feasible within a reasonable time due to technology maturity, safety-code siting, fueling throughput/logistics, and cost/supply constraints.

S6-14 As documented in the *Feasibility Analysis of New Propulsion Locomotive Technologies and Overhead Catenary for the BIG Project,* Prepared by Michael E. Iden. P.E., dated March 2026 (BEL and Catenary Feasibility Analysis), hydrogen locomotives are not commercially ready, with the model referenced by the Commenter only in Phase One of three testing phases. Additionally, hydrogen locomotives "would essentially be stranded assets with limited utility and no interoperability that the balance of BNSF's locomotive fleet has" (page 98). Regarding hybrid locomotives, as discussed in the *BEL and Catenary Feasibility Analysis*, there is a single hybrid locomotive undergoing its initial testing, thus, hybrid locomotives are still experimental/prototype and not commercially ready.

Additionally, BNSF has entered into a Memorandum of Understanding with MDAQMD to implement a demonstration program testing five hybrid diesel electric linehaul locomotives that consume less fuel and generate lower emissions than traditional diesel locomotives during mainline operations, to determine if hybrid locomotives could become feasible. These locomotives also have the ability to operate in zero emissions mode when near BIG or at the BIG rail yard. However, given it is unknown and thus speculative whether the demonstration program would be accomplished and would reduce impacts, the demonstration program is not mitigation under CEQA and the Draft EIR did not take credit for these emissions reductions. Additionally, BNSF has entered into a Memorandum of Understanding to engage in good faith with CARB to explore currently infeasible technologies and other methods that could potentially further reduce emissions. The CARB Memorandum of Understanding is not mitigation under CEQA and the Draft EIR does not take credit for potential emissions reductions. As noted in the *Governor's Certification for Judicial Streamlining of the Barstow*

13 https://www.hydrogen.energy.gov/docs/hydrogenprogramlibraries/pdfs/review21/ta047_ehrhart_2021_o-pdf.pdf?Status=Master.
14 https://hydrogeneurope.eu/wp-content/uploads/2021/11/Tech-Overview_Hydrogen-Transport-Distribution.pdf.
15 https://www.hydrogen.energy.gov/docs/hydrogenprogramlibraries/pdfs/review20/ta034_ahluwalia_2020_o.pdf?Status=Master.
16 https://oneh2.com/oneh2-launches-931-bar-high-pressure-tube-trailers-for-hydrogen-delivery/.

International Gateway Project in the County of San Bernardino[17]*,* "The Project Applicant has entered into a Memorandum of Understanding (MOU) with [MDAQMD] executed on February 23, 2026…and with [CARB] executed April 23, 2026… to implement a demonstration project of hybrid battery electric locomotive technology ("Pilot") as part of the Project." Thus, the Draft EIR carefully considered emission-reducing measures and implemented all feasible mitigation measures.

See **Consolidated Response 05-06** concerning the feasibility of specific technology (e.g., specific hybrid locomotive technologies raised by commenter) and other mitigation measures.

S6-15 See **Consolidated Response 05** concerning feasible and enforceable mitigation including applicable legal standards and showing that "interim solutions" are not proper CEQA mitigation. Also see **Consolidated Response 05-06** concerning the feasibility of specific technology and other mitigation measures, as well the *Feasibility Analysis of New Propulsion Locomotive Technologies and Overhead Catenary for the BIG Project,* prepared by Michael E. Iden, P.E., dated March 2026 (*BEL and Catenary Feasibility Analysis*), which addresses battery tender, intermittent catenary and hydrogen technologies. The BEL and Catenary Feasibility Report notes that catenary is infeasible for multiple reasons including that no locomotive manufacturer has produced even a prototype freight locomotive, catenary is at risk of major interruptions, and a development timeline of 9-20 years. Furthermore, as detailed in *BEL and Catenary Feasibility Analysis*, the improvement from Tier 4 locomotives to zero emission would result in less than 1% reduction in pollutant concentrations compared to the high reductions already achieved through Tier 4. Under CEQA, mitigation measures are also required to be "roughly proportional" to the significant impacts found in an EIR (State CEQA Guidelines § 15126.4(a) (4&5)). Here, the benefits are marginal.

As an initial matter commenter acknowledges that "current battery-electric line-haul units have smaller energy capacities than diesel locomotives" and provides no evidence of BEL feasibility as mitigation for BIG.

Regarding battery tender technology, the key constraints are: (1) no proven, interchange-standardized battery-tender product; (2) unresolved safety and crashworthiness requirements for very large lithium-ion energy storage on a freight[18,19,20] (3) the need for megawatt-class charging and associated multi-year grid interconnections (see **Consolidated Response 05-06** concerning the feasibility of specific technology and other mitigation measures); (4) train-handling and capacity penalties from adding non-revenue cars; and (5) the FRA's own research framing tender concepts as prototypes to be developed and tested, not a deployable solution for a 24/7 Class 1 terminal.[21]

[17] Submitted into the administrative record to the City on May 1, 2026.
[18] https://www.ecfr.gov/current/title-49/subtitle-B/chapter-II/part-229/subpart-D.
[19] https://www.federalregister.gov/documents/2006/06/28/06-5667/locomotive-crashworthiness.
[20] https://www.ecfr.gov/current/title-49/subtitle-B/chapter-I/subchapter-C/part-173/subpart-E/section-173.185.
[21] https://railroads.dot.gov/sites/fra.dot.gov/files/2025-01/CB%20Framework%20Rail%20Electrification%20Options.pdf.

Additionally, adding a battery tender increases train length and rolling resistance without adding powered axles. Train resistance engineering and research show that resistance rises with weight/drag and that additional cars impose a measurable tractive-effort burden; particularly relevant on grades and in terminal accelerations where switch windows are tight. BIG's would require high-throughput terminal operations and non-revenue cars (such as battery tenders) reduce capacity or require more locomotives/energy to maintain schedules.

The use of hybrid line-haul locomotives is speculative and not enforceable as mitigation. The technologies cited by the commenter are described as pilot projects, demonstrations, or emerging concepts that depend on factors outside the Lead Agency's control, including manufacturer deployment schedules, railroad fleet decisions, fueling infrastructure, and regulatory approvals. Because commercially available hybrids have low power capacity, their zero-emission functions are limited. In practice, including hybrid switchers in diesel-hybrid consists (as would be required operationally), would require smaller trains or more switchers in total. See **Consolidated Response 05-06** concerning the feasibility of specific technology (e.g., specific hybrid locomotive technologies raised by commenter) and other mitigation measures.

CEQA does not require mitigation measures that depend on uncertain future technological developments or third-party actions, nor does it require agencies to assume that pilot or demonstration technologies would become commercially available or operationally suitable within the Project's timeframe (State CEQA Guidelines §§ 15126.4(a)(1), 15145). See *BEL and Catenary Feasibility Analysis*.

CEQA does not require adoption of "interim" mitigation measures as a bridge to potential future technologies where such measures are not necessary to mitigate a significant impact and are not shown to be feasible or effective. Courts have consistently held that CEQA does not require agencies to adopt speculative, interim, or pilot-stage mitigation measures as a bridge to potential future technologies. Mitigation must be feasible, enforceable, and supported by substantial evidence at the time of project approval, and agencies are not required to mandate measures that depend on uncertain technological development or third-party actions.[22,23,24] CEQA likewise does not require adoption of hypothetical interim measures that would not alter the significance of identified impacts.[25] See also **Consolidated Response 05**. CEQA does not require the EIR to mandate interim technologies as a bridge to future zero-emission systems, nor does it require the Lead Agency to dictate fleet composition decisions to a private railroad operator where such decisions are outside the scope of the BIG Project and not necessary to mitigate a significant environmental impact.

Additionally, BNSF has entered into a Memorandum of Understanding with MDAQMD to implement a demonstration program testing five hybrid diesel electric linehaul locomotives that consume less fuel and generate lower emissions than traditional diesel locomotives

[22] *Cherry Valley Pass Acres & Neighbors v. City of Beaumont* (2010) 190 Cal.App.4th 316, 337–338.
[23] *POET, LLC v. State Air Resources Board* (2013) 218 Cal.App.4th 681, 735–737.
[24] *Laurel Heights Improvement Assn. v. Regents of the University of California* (1988) 47 Cal.3d 376, 396–399.
[25] *Santa Rita Union School District v. City of Salinas* (2023) 94 Cal.App.5th 298, 321–324.

during mainline operations, to determine if hybrid locomotives could become feasible. These locomotives also have the ability to operate in zero emissions mode when near BIG or at the BIG rail yard. However, given it is unknown and thus speculative whether the demonstration program would be accomplished and would reduce impacts, the demonstration program is not mitigation under CEQA and the Draft EIR did not take credit for these emissions reductions. Additionally, BNSF has entered into a Memorandum of Understanding to engage in good faith with CARB to explore currently infeasible technologies and other methods that could potentially further reduce emissions. The CARB Memorandum of Understanding is not mitigation under CEQA and the Draft EIR does not take credit for potential emissions reductions. As noted in the *Governor's Certification for Judicial Streamlining of the Barstow International Gateway Project in the County of San Bernardino*[26], "The Project Applicant has entered into a Memorandum of Understanding (MOU) with [MDAQMD] executed on February 23, 2026…and with [CARB] executed April 23, 2026… to implement a demonstration project of hybrid battery electric locomotive technology ("Pilot") as part of the Project." Thus, the Draft EIR carefully considered emission-reducing measures and implemented all feasible mitigation measures.

S6-16 See **Response S6-8** concerning feasibility of zero-emission technologies for locomotives. See also **Consolidated Response 16** concerning BESS. See **Consolidated Response 05** concerning feasible and enforceable mitigation including applicable legal standards and **Consolidated Response 05-06** concerning the feasibility of specific technology and other mitigation measures (e.g., ZE trucks for application as mitigation at BIG as raised by commenter).

S6-17 **Consolidated Response 05** concerning feasible and enforceable mitigation including applicable legal standards and **Consolidated Response 05-06** concerning the feasibility of specific technology and other mitigation measures (e.g., ZE trucks for application as mitigation at BIG as raised by commenter). The commenter suggests that funding for ZE trucks is available through third-party sources. However, as described in **Consolidated Response-05** concerning feasible and enforceable mitigation, heavy duty trucks accessing BIG are not owned, operated or controlled by BNSF and accordingly any sources of funding to the truck owners or operators are irrelevant under CEQA feasibility analysis. Feasibility is determined by looking at what is capable of being accomplished by the person or entity seeking the discretionary approval.

S6-18 See **Response S6-7** through **S6-15** concerning the feasibility of zero emissions technologies for locomotives. See **Consolidated Response 05-06** concerning the feasibility of specific technology and other mitigation measures and **Consolidated Response 16** concerning BESS.

S6-19 CARB's comment asserts that the Draft EIR "assumes that a portion of the proposed transload warehousing would be used for cold storage" based on TRU activity included in the Air Quality analysis and the language in **MM BIG-AQ-14**, stating Electrical rooms must be sized to allow for future power panels serving refrigerated TRUs, with conduit installed from the electrical room to tenant-designated loading dock locations to accommodate cold storage operations

[26] Submitted into the administrative record to the City on May 1, 2026.

if cold storage is required by future tenants. However, BIG does not include any cold-storage warehouse uses, nor would any on-site warehouse handle goods requiring refrigeration or temperature-controlled storage.

No Cold-Storage Uses Are Proposed or Allowed

The Project Description clearly defines the transload warehouse center as facilities designed for transferring goods from international containers to domestic containers (cross-dock intermodal operations). The Draft EIR nowhere identifies refrigerated warehousing, cold-storage, or temperature-controlled uses, nor does the Specific Plan permit such uses.

Draft EIR Section 3.0: Project Description (page 3-8) states that the transload warehouse center "would be designed to process containers from cross-dock intermodal operations" (i.e., non-refrigerated consumer goods). No refrigeration systems, insulated building envelopes, refrigerated docks, ammonia systems, or cold-storage mechanical equipment are proposed. Because no cold-storage is proposed or permitted, no trucks, trailers, railcars, or yard equipment would require TRUs for on-site transloading operations.

Why TRUs Appear in the Air Quality Analysis

Appendix 5.3 BIG-1 Air Quality Technical Report includes a TRU emission factor only to conservatively capture "thru-traffic" TRUs that may already be traveling in the region and could pass through BIG site or be present in small numbers due to anomalous shipping patterns. This is a conservative modeling assumption and not an indication that BIG includes cold-storage. The analysis includes TRUs in the regional emissions modeling; localized impact analysis, and the Health Risk Assessment. This conservative approach satisfies CEQA's mandate to evaluate the "reasonably foreseeable" worst-case emissions scenario (State CEQA Guidelines §§ 15126.2(a) and 15144). The presence of the TRU emissions factor does not mean TRU-servable warehouse uses are proposed; it means the Draft EIR conservatively examines the possibility of incidental TRU arrivals.

Purpose of MM BIG-AQ-14

CARB interprets **MM BIG-AQ-14's** requirement for electrical panel capacity as evidence that cold storage may occur. However, **MM BIG-AQ-14** does not authorize cold-storage uses. It does not indicate any expectation that diesel TRUs would operate on-site. Instead, it ensures that if any incidental, occasional TRU-equipped trailers (that may arrive irrespective of Project uses) are on site, they would have the infrastructure for future plug-in connections rather than diesel operation, resulting in lower emissions compared to the No Project condition. This is a standard "future-proofing" measure for environmental impact reduction, not a land-use authorization. The mitigation therefore reduces the potential emissions associated with hypothetical TRU equipment and is squarely within CEQA's mandate to require feasible measures to "minimize significant effects" (State CEQA Guidelines § 15126.4(a)(1)).

The Draft EIR Fully Analyzes TRU Emissions and Health Risk

CARB asserts that the Draft EIR "fails to analyze" potential TRU health impacts. However, the Draft EIR includes TRU emissions in the emission inventory (see **Draft EIR Appendix 5.3 BIG-1**, page 67), localized air quality modeling, the Health Risk Assessment modeled for thousands of receptor locations (see **Draft EIR Appendix 5.3 BIG-1** (pages 151 through 166)) and accounts for TRU activity even though BIG does not propose any cold storage uses. This approach meets CEQA's substantial evidence standard and its requirement to disclose "reasonably foreseeable" emissions (State CEQA Guidelines §§ 15144, 15151, 15064(b)).

Summary

Under CEQA, the lead agency must evaluate the proposed project (State CEQA Guidelines § 15124) and its reasonably foreseeable environmental impacts (State CEQA Guidelines § 15126.2) using best-available information and reasonable assumptions (State CEQA Guidelines §§ 15144, 15151). The Draft EIR satisfies these requirements because:

1. Cold storage is not part of BIG, and the Draft EIR clearly and accurately describes BIG.
2. TRUs were included only as a conservative modeling assumption, not because TRU-dependent uses are proposed.
3. The Draft EIR thoroughly analyzes TRU-related impacts, including regional emissions, localized impacts, and health risk; consistent with CEQA's substantial evidence requirement.
4. **MM BIG-AQ-14** serves to reduce possible incidental emissions, consistent with State CEQA Guidelines § 15126.4(a)(1).
5. Requiring lease-based prohibitions on diesel TRUs is unnecessary because the land use itself does not and cannot generate cold-storage-dependent TRU activity.

S6-20 See **Response S6-19**. BIG does not include cold-storage or refrigerated warehouse uses, and no portion of the transload warehouse center is designed or entitled for temperature-controlled storage. Transport refrigeration units (TRUs) were included in the emissions modeling solely to conservatively account for potential incidental TRUs passing through the facility. No regular TRU activity is expected, and diesel TRU operations are not required or supported by BIG's land uses. **MM BIG-AQ-14** does not authorize cold-storage activities; instead, it provides for future electrical capacity to minimize emissions from any unexpected TRU-equipped trailers that may arrive.

S6-21 The impact evaluation for the Barstow General Plan component provides a program-level review of impacts from growth in accordance with buildout of the City's General Plan. The analysis is intended to evaluate impacts at a broader, policy or planning scale. Under CEQA, the type of project determines the degree of specificity required in an EIR. Generally, as provided in State CEQA Guidelines § 15378: Degree of Specificity, the level of specificity included in the EIR is commensurate with the level of detail that is known and the degree of specificity involved in the underlying activity. For example, a project-specific EIR will necessarily be more detailed in the specific effects of the project than will be an EIR on the

adoption of a local general plan or comprehensive zoning ordinance because the effects of the construction can be predicted with greater accuracy.

With respect to the proposed General Plan, the EIR is a programmatic document that provides a first-tier, City-wide environmental assessment of the potential significant environmental effects of implementing policies, strategies, projects, and programs included in the proposed General Plan over a minimum 20-year horizon period. The focus of the environmental analysis for the proposed General Plan is on potential City-scale impacts associated with implementation of the General Plan as a whole. Future development under the proposed General Plan would be conditioned or modified to include mitigation, development standards or conditions derived from proposed General Plan policies.

The proposed General Plan is largely designed to be self-mitigating by incorporating policies and implementation programs that address and mitigate environmental impacts related to implementing the proposed General Plan, such as zoning codes and design standards. In addition, mitigation measures are included for the proposed General Plan to address program-level impacts, often cumulative, associated with long-term buildout of the General Plan by requiring future individual projects approved under the General Plan to incorporate certain measures. In this context, CEQA allows for mitigation measures to require future project-specific technical studies so long as the mitigation is not deferred in substance and includes clear performance standards. Mitigation Measures (**MM**) **GP AQ-1, GP AQ-2, and GP AQ-3** (1) commit the City of Barstow and future applicants for discretionary projects to mitigation; (2) establish clear performance criteria based on the MDAQMD's CEQA significance thresholds; and (3) provide examples of site-specific measures that could be implemented by future applicants for development projects to reduce emissions. As such the mitigation measures, as written, comply with CEQA Guidelines Section 15126.4(a)(1)(B). The mitigation measures do not simply require a report and require that project applicants follow the recommendations of the report. **MM GP AQ-1**, **GP AQ-2**, and **GP AQ-3** have a clear, quantitative performance standard that the future projects would need to achieve. See **Consolidated Response 05-07** concerning the use of performance standards and deferred mitigation.

At the Commenter's request, **MM GP AQ-3** has been modified to eliminate "to the extent feasible" and clarify that the "acceptable level" is the MDAQMD's significance criteria. The City has further revised the mitigation measures for clarity; these changes do not change the Draft EIR's analysis and the Draft EIR's conclusions remain valid. Draft EIR **MM GP AQ-1**, **MM GP AQ-2**, and **MM GP AQ-3** are revised in **Final EIR Section 3.0: Errata to the Draft EIR**, as follows:

MM GP AQ-1 Reduce Emissions from Construction Activities. Prior to issuance of any construction permits for development projects subject to CEQA review (i.e., non-exempt projects), development project applicants shall prepare and submit to the City of Barstow (City) Planning Division a technical assessment evaluating potential project construction-related air quality impacts. The evaluation shall be prepared in conformance with the Mojave Desert Air Quality Management District (MDAQMD) methodology and guidelines

for projects in the Mojave Desert Air Basin. If construction-related criteria air pollutants are determined to have the potential to exceed the adopted thresholds of significance of the applicable air district, the City Planning Division shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during construction activities to below these thresholds~~, to the extent feasible~~. These identified measures shall be incorporated into appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City Public Works Division. Mitigation measures to reduce construction-related emissions could include, but are not limited to:

a. Use of construction equipment rated by the United States Environmental Protection Agency as having ~~Tier 3 (model year 2006 or newer) or~~ Tier 4 (model year 2008 or newer) emission limits, applicable for engines between 50 and 750 horsepower. A list of construction equipment by type and model year shall be maintained by the construction contractor on-site and available for City review upon request.
b. Ensure construction equipment is properly serviced and maintained to the manufacturer's standards.
c. Use of alternative-fueled or catalyst-equipped diesel construction equipment, if available and feasible.
d. Clearly posted signs that require operators of trucks and construction equipment to minimize idling time (e.g., five minute maximum).
e. Preparation and implementation of a fugitive dust control plan that may include the following measures:
f. Disturbed areas (including storage piles) that are not being actively utilized for construction purposes shall be effectively stabilized using water or chemical stabilizer/suppressant, or covered with a tarp or other suitable cover (e.g., revegetated).
g. On-site unpaved roads and off-site unpaved access roads shall be effectively stabilized using water or chemical stabilizer/suppressant.
h. Land clearing, grubbing, scraping, excavation, land leveling, grading, cut and fill, and demolition activities shall be effectively controlled utilizing application of water or by presoaking.
i. Material shall be covered or effectively wetted to limit visible dust emissions, and at least six inches of freeboard space from the top of the container shall be maintained when materials are transported off the site.
j. Operations shall limit or expeditiously remove the accumulation of mud or dirt from adjacent public streets at the end of each workday. (The use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions. Use of blower devices is expressly forbidden.)
k. Following the addition of materials to or the removal of materials from the surface of outdoor storage piles, said piles shall be effectively stabilized to prevent fugitive dust emissions utilizing sufficient water or chemical stabilizer/suppressant.

l. Within urban areas, track out shall be immediately removed when it extends 50 or more feet from the site and at the end of each workday.
m. Any site with 150 or more vehicle trips per day shall prevent carryout and track out.
n. Limit traffic speeds on unpaved roads to 15 mph.
o. Install sandbags or other erosion control measures to prevent silt runoff to public roadways from sites with a slope greater than one percent.
p. Install wheel washers for all exiting trucks or wash off all trucks and equipment leaving the project area.
q. Require electrical hookups for battery/electric tools.
r. Require battery-electric or plug-in electric power where feasible for off-road equipment under 19 kW (e.g., compactors, pressure washers).
s. Require model-year 2014 or newer heavy-duty trucks for construction access meeting CARB's lowest optional NOx standard.

MM GP AQ-2 Reduce Emissions from Operation. Prior to discretionary approval by the City of Barstow (City) Planning Division for development projects subject to CEQA review (i.e., nonexempt projects), project applicants shall prepare a technical assessment evaluating potential air quality impacts related to the project operation phase and submit it to the City Planning Division for review and approval. The evaluation shall be prepared in conformance with the Mojave Desert Air Quality Management District (MDAQMD) methodology and guidelines for projects in the Mojave Desert Air Basin. If operation-related air pollutants are determined to have the potential to exceed the MDAQMD-adopted thresholds of significance, the City Planning Division shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions to below these thresholds, ~~to the extent feasible,~~ during operational activities. The identified measures shall be included as part of the conditions of approval. Possible mitigation measures to reduce long-term emissions can include, but are not limited to:

a. For site-specific development that requires refrigerated vehicles, the construction documents shall demonstrate an adequate number of electrical service connections at loading docks for plug-in of the anticipated number of refrigerated trailers to reduce idling time and emissions.
b. Applicants for manufacturing and light industrial uses shall utilize energy storage and combined heat and power in appropriate applications to optimize renewable energy generation systems and avoid peak energy use.
c. Applicants for non-residential developments with over 50 employees shall provide changing/shower facilities as specified, at minimum, or greater than in the California Green Building Standards (CALGreen) Code (Non-residential Voluntary Measures).
d. Applicants for multifamily, hotel, and motel developments shall provide bicycle parking facilities equivalent to or greater than as specified in the Residential Voluntary Measures of the CALGreen Code.
e. Applicants for non-residential developments with 50 or more parking spaces shall provide preferential parking spaces for low-emitting, fuel-efficient, and

carpool/van vehicles equivalent to or greater than the CALGreen Code (Non-residential Voluntary Measures).

f. Applicants for non-residential developments and multi-family residential developments shall provide facilities to support electric charging stations identified in the Non-residential Voluntary Measures and Residential Voluntary Measures of the CALGreen Code, respectively.
g. Applicant-provided appliances shall be Energy Star-certified appliances or appliances of equivalent energy efficiency (e.g., dishwashers, refrigerators, clothes washers, and dryers). Installation of Energy Star-certified or equivalent appliances shall be verified by Building & Safety during plan check.
h. Applicants for future development projects along existing and planned transit routes shall coordinate with the City of Barstow and the applicable transit agency to ensure that bus pad and shelter improvements are incorporated, as appropriate.
i. Applicants for warehouse projects that maintain a heavy-duty truck fleet shall evaluate the feasibility of requiring a zero-emission heavy truck fleet, or near-zero heavy truck fleet.
j. Applicants for warehouse projects shall place signage at truck access gates, loading docks, and truck parking areas that identify applicable California Air Resources Board (CARB) anti-idling regulations (e.g., Rule 2485). At minimum, each sign shall include: 1) instructions for truck drivers to shut off engines when not in use; 2) instructions for drivers of diesel trucks to restrict nonessential idling to no more than two consecutive minutes (compared to five minutes currently allowed under Rule 2485); and 3) telephone numbers of the building facilities manager and CARB to report violations.
k. If Applicants for warehouse project have domiciled heavy-duty trucks (Class 7 and 8) onsite, the tenant/operator of the facility shall be required to provide electric truck charging facilities on site sufficient to charge the electric trucks domiciled on the site, and such facilities shall be made available for all electric trucks that use the facility, to the extent the applicable utility authorizes and has capacity to support.

MM GP AQ-3 Operational Health Risk Assessment. Applicants for new discretionary industrial or warehousing projects or commercial land uses that would generate substantial diesel truck travel—i.e., 40 diesel trucks per day per the Mojave Desert Air Quality Management District (MDAQMD) CEQA Guidelines, or 40 or more trucks with diesel-powered transport refrigeration units per day based on the California Air Resources Board recommendations for siting new sensitive land uses—and that are within 1,000 feet of existing or planned sensitive land uses shall prepare a health risk assessment (HRA). Sensitive land uses consist of residences, senior living/assisted living communities, schools, daycare centers, playgrounds, and medical facilities. All HRAs shall be submitted to the City of Barstow Planning Division and the MDAQMD for evaluation.

The HRA shall be prepared in accordance with policies and procedures of the State Office of Environmental Health Hazard Assessment and MDAQMD for projects in the Mojave

Desert Air Basin (MDAB). If the HRA shows that the project incremental cancer risk exceeds ten in one million (10E-06) or the risk thresholds in effect at the time a project is considered, or that the appropriate noncancer hazard index exceeds 1.0 or the thresholds as determined by MDAQMD at the time a project is considered, the applicant shall identify and demonstrate that measures are capable of reducing potential cancer and noncancer risks to ~~an acceptable level to the extent feasible~~ the thresholds identified by MDAQMD above (i.e., cancer risk of 10E-06 or noncancer hazard index of 1.0), including appropriate enforcement mechanisms. Measures to reduce risk impacts may include but are not limited to:

a. Restricting idling on-site beyond Air Toxic Control Measures idling restrictions, as feasible.
b. Electrifying warehousing docks.
c. Requiring use of newer equipment and/or vehicles.
d. Restricting off-site truck travel through the creation of truck routes.

Measures identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of the proposed project.

Thus, as explained above, State CEQA Guideline § 15126.4(a)(1)(B) allows for the use of performance standards for mitigating a significant impact when it is infeasible to specify details in the EIR. The measures identified in the EIR are specific measures required for the future development projects that would ensure that the construction, operations, or localized emissions achieve the MDAQMD's significance criteria. In these instances, CEQA requires the lead agency to commit to implementing the mitigation, to adopt specified performance standards, and to identify "the types of potential actions that could feasibly achieve that performance standard."[27] **MM GP AQ-1** to **AQ-3**, as revised as noted above, comply with these provisions by requiring assessments, setting quantitative performance standards, and specifying measures such as low-emissions equipment, electric charging, and other strategies to mitigate impacts. Courts have held that specifying details of mitigation measures pending further study is not necessary when infeasible and when the EIR adopts clear performance standards, commits the agency to following them, and specifies types of mitigation measures that could satisfy them.[28] Courts defer substantially to agencies in developing these performance standards: they simply need to be "reasonably clear," they need not be "arithmetically precise."[29] The Draft EIR complies with CEQA's requirements by including

[27] Save Our Capitol! v Department of Gen. Servs. (2023) 87 CA5th 655, 687-88 (citing State CEQA Guidelines, § 15126.4, subd. (a)(1)(B).); see *also East Oakland Stadium Alliance v City of Oakland* (2023) 89 CA5th 1226, 1255 (affirming mitigation measures that required a health risk assessment and target cleanup levels tied to that assessment).

[28] Endangered Habitats League, Inc. v County of Orange (2005) 131 CA4th 777, 794; *Defend the Bay v City of Irvine (2004) 119 CA4th 1261, 1275.*

[29] *East Oakland Stadium Alliance v City of Oakland* (2023) 89 CA5th 1226, 1255, 1258*; see* also C*enter for Biological Diversity v Department of Fish & Wildlife* (2015) 234 CA4th 214, 245 (performance standards only need to inform the agency "what it is to do and what it must accomplish").

quantitative standards for **MM GP AQ-1** to **AQ-3**. Accordingly, **MM GP AQ-1, GP AQ-2, and GP AQ-3** do not improperly defer mitigation.

The level of detail provided in the mitigation measures is also appropriate and consistent with the nature of a long-range, program-level environmental review conducted under CEQA. With the exception of BIG, which is evaluated at a project level, the General Plan is a long-range policy plan. Individual projects or plans are not available; and therefore, the specific project-level details—such as precise locations, engineering designs, and construction methods—are not yet known. As a result, mitigation measures at this stage appropriately establish performance standards and a menu of potential requirements that will guide future project-level decision-making, rather than prescribing fully site-specific design features that cannot yet be determined. Defining highly specific mitigation measures at this stage would be speculative and potentially ineffective or infeasible when applied to future projects with differing baseline conditions. Accordingly, the program-level EIR for the General Plan appropriately balances the need for meaningful environmental protection with the practical limitations inherent in long-range planning. The mitigation framework ensures that future projects under the plan will be required to implement site-specific mitigation measures that achieve the established performance standards.

Similarly, the health risk assessment proposed as part of **MM GP AQ-3** is not problematic, as suggested by commenters, but instead precisely within the legal framework established by CEQA for mitigations measures. Future studies may be relied upon to inform and tailor mitigation measures.[30]

It is further noted that despite the requirement for future discretionary projects under the proposed General Plan to mitigate the construction, operation, and localized air quality emissions, overall impacts of the proposed General Plan were considered significant and unavoidable; see Draft EIR Executive Summary Table 1-1 (pages 1-15 through 1-20).

The mitigation measures also do not rely on subjective approval by a single staff member in the City. Rather, **MM GP AQ-1, GP AQ-2, GP AQ-3** require that each project-specific technical report document the measures needed to achieve the MDAQMD significance criteria and be provided to the City's Planning Division. The City's Planning Division is the responsible monitoring party for air quality mitigation. **MM GP AQ-1** requires that during construction, the City's Public Works Division verify these measures. **MM GP AQ-3**. Therefore, the mitigation measures include a monitoring and enforcement mechanism for both before the project is

[30] *City of Hayward v Board of Trustees of Cal. State Univ.* (2015) 242 CA4th 833, 855 (upholding transportation demand management program that included performance goals and evaluation of mitigation measures); *City of Maywood v Los Angeles Unified Sch. Dist*. (2012) 208 CA4th 362, 411 (upholding mitigation measure, based on further investigation of contamination at project site); *National Parks & Conserv. Ass'n v County of Riverside* (1999) 71 CA4th 1341, 1366 (approving deferred decisions regarding placement of tortoise protection fences to further study of migration patterns during operation of project). *Gray v County of Madera* (2008) 167 CA4th 1099, 1126 (upholding deferred design of exterior lighting system subject to performance standards after facility is built).

approved and during construction to ensure that future development projects implement mitigation in accordance with MDAQMD's guidelines (2020).[31]

S6-22 See **Response S6-21**. **MM GP AQ-1, GP AQ-2, and GP AQ-3** (1) commits the City of Barstow and future applicants for discretionary projects to mitigation; (2) establishes clear performance criteria based on the MDAQMD's CEQA significance thresholds; and (3) provides examples of site-specific measures that could be implemented by the future applicants for development projects to reduce emissions. As such, the mitigation measures comply with CEQA Guidelines Section 15126.4(a)(1)(B).

S6-23 See **Response S6-21**. **MM GP AQ-1, GP AQ-2, and GP AQ-3** (1) commit the Barstow and future applicants for discretionary projects to mitigation; (2) establish a clear performance criteria based on the MDAQMD's CEQA significance thresholds; and (3) provide examples of site-specific measures that could be implemented by the future applicants for development projects to reduce emissions. As such the mitigation measure comply with State CEQA Guidelines Section 15126.4(a)(1)(B).

S6-24 See **Response S6-21**. **MM GP AQ-1, GP AQ-2, and GP AQ-3 (1)** commit the Barstow and future applicants for discretionary projects to mitigation; (2) establish a clear performance criteria based on the MDAQMD's CEQA significance thresholds; and (3) provide examples of site-specific measures that could be implemented by the future applicants for development projects to reduce emissions. As such the mitigation measures comply with CEQA Guidelines Section 15126.4(a)(1)(B).

S6-25 See **Response S6-21**. The mitigation measures do not simply require a report and require that project applicants follow the recommendations of the report. Revised **MM GP AQ-1, GP AQ-2, and GP AQ-3** have a clear, quantitative performance standard that the future projects would need to achieve.

S6-26 See **Response S6-21**. The mitigation measures do not rely on subjective approval by a single staff member in the City. The City's Planning Division is the responsible monitoring party for this component of the mitigation. **MM GP AQ-1** also requires that during construction the City's Public Works Division verify these measures. Therefore, the mitigation measure includes a monitoring and enforcement mechanism before the project is approved and during construction to ensure that future development projects implement mitigation in accordance with MDAQMD's guidelines (2020).[32]

S6-27 See **Responses S6-21** and **S6-26**. At the request of the Commenter, **MM GP AQ-3** has been modified to eliminate "to the extent feasible" and clarify that the "acceptable level" is the MDAQMD's significance criteria. See also **Final EIR Section 3.0: Errata to the Draft EIR**.

[31] Mojave Desert Air Quality Management District (MDAQMD). February 2020. MDAQMD California Environmental Quality Act (CEQA) and Federal Conformity Guidelines. https://www.mdaqmd.ca.gov/rules/overview#docaccess-7b21c5aafa1366cf6324c84cab07a19ae820271b692265c4a3ff53b327183a9b.

[32] Mojave Desert Air Quality Management District (MDAQMD). February 2020. MDAQMD California Environmental Quality Act (CEQA) and Federal Conformity Guidelines. https://www.mdaqmd.ca.gov/rules/overview#docaccess-7b21c5aafa1366cf6324c84cab07a19ae820271b692265c4a3ff53b327183a9b.

S6-28 CARB identifies several suggested construction phase and operation phase mandatory measures. **MM GP AQ-1** already includes a requirement to limit idle time of construction equipment. **MM GP AQ-1** also already includes a requirement for Tier 4 equipment. Additionally, construction contractors are required by law to comply with equipment and vehicle standards. At the request of the Commenter, the construction measures not currently listed have been incorporated into **MM GP AQ-1**, as shown under **Response S6-21** and in **Final EIR Section 3.0: Errata to the Draft EIR**.

S6-29 See **Response S6-21** and **S6-25**. CARB identifies several construction phase mandatory measures. At the request of the Commenter, the construction measures not currently listed have been incorporated into **MM GP AQ-1**, as shown under **Response S6-21** and in **Final EIR Section 3.0: Errata to the Draft EIR.**

S6-30 CARB suggests several operation phase mandatory measures. The City appreciates these suggestions but note that the transition to zero emission (ZE) heavy-duty vehicles is evolving and highly dependent on a changing regulatory landscape. Furthermore, market availability of ZE trucks varies by vehicle class, duty cycle, and operational needs. (See **Consolidated Response 05-06**, concerning the feasibility of specific technology and other mitigation measures and *Zero Emission Trucks Feasibility Evaluation for Barstow International Gateway* for more detailed discussion of ZE trucks). While the *Zero Emission Trucks Feasibility Evaluation for Barstow International Gateway* was prepared for BIG, the City notes that the conclusion that industry-wide solutions are necessary is equally applicable to warehouse development in the City; if the City were to require zero-emission/near-zero emission trucks for all warehouse development in the City, warehouse developers would choose to locate in other nearby cities which do not place this burden on their fleet. **MM GP AQ-2** already requires electrification of docks for cold storage. At the request of the Commenter, the operational phase measures suggested by CARB that are not currently listed have been incorporated into **MM GP AQ-2**, as shown under **Response S6-21** and in **Final EIR Section 3.0: Errata to the Draft EIR.**

S6-31 See also **Response S6-26** through **S6-27**.

The General Plan is a broad-based policy plan, which guides growth and development in the City. The policies in the General Plan guide decision makers when adopting future discretionary projects and also guide city decisionmakers and staff when adopting new city-initiated projects, programs, and initiatives.

The General Plan contains a number of policies directed at reducing environmental impacts, including emissions, and thereby mitigating cumulative impacts.

As noted on draft EIR pages 5.3-78 (criteria air pollutants) and page 5.3-122 (toxic air contaminant [TACs]), implementation of the proposed General Plan policies would reduce criteria air pollutant emissions, greenhouse gas (GHG) emissions, and/or TACs, including:

- Policies OSC-8.1, OSC-8.2, OSC-8.4, and S-2.8, which would support the City's pursuit of energy conservation and energy efficiency programs and promote use of renewable energy within the City to reduce energy-sector emissions.
- Circulation Element policies, such as Policies CM-2.1, CM-2.2, CM-2.5, CM-2.6, CM-2.7, CM-2.8, and CM-2.9; as well as Land Use Element Policies LU-2.1 and LU-3.2; and Policy OSC-1.5 of the Open Space Conservation Element. These policies direct the City to expand the pedestrian and bicycle network infrastructure. The General Plan would direct the City to support increasing use of electric bikes (Policy CM-2.3) and expand transit service (Policy CM-2.4). The City would also promote transportation demand management strategies to reduce household and employment passenger car VMT (Policy CM-2.10). Overall, these policies would reduce emissions from on-road transportation sources.
- Land Use element policies, such as Policies LU-1.1, LU-1.4, and LU-1.5; Circulation Element Policies CM-3.1 and CM-3.2; and Open Space and Conservation Element Policies OSC-3.1 and OSC-3.2 would minimize exposure of sensitive receptors to TAC emissions. The Land Use Element policies and OSC-3.1 address buffer distances for both new sources and new sensitive receptors. Circulation Element policies identify truck routes and truck parking to minimize the effect of trucks on sensitive land uses. OSC-Policy 3.2 requires coordination with the Mojave Desert Air Quality Management District to monitor major and reduce sources of air pollution.

The policies of the General Plan therefore have a mitigating effect on cumulative air quality impacts.

In addition, the mitigation measures required for future discretionary development in the City would also reduce cumulative emissions. The Draft EIR includes several mitigation measures to address program-level air quality impacts associated with long-term buildout of the General Plan (see **MM GP AQ-1 through GP AQ-3**), as well as site-specific measures for BIG (see **MM BIG AQ-1 through BIG AQ-14**).

Finally, it should be noted that the primary emissions sources generated within the City are typically associated with on-road vehicles and building energy use, which are preempted from being regulated by local governments. These emissions sources are preempted because regulatory authority over those sources has been exclusively assigned to federal or state agencies. For example, the EPA has the primary authority to set vehicle emissions standards and local agencies are generally preempted from imposing their own emissions standards on these sources. Furthermore, in 2025 the U.S. Congress and the Trump Administration, formally nullified California's Advanced Clean Truck Act (ACT) rule and ACC II program. Currently, the State of California lacks the regulatory authority to mandate ZE/NZE Trucks under the State's ACT regulation or any other regulation.

The Draft EIR follows CEQA's requirements in discussing the General Plan's cumulative impacts, disclosing that they may be cumulatively considerable, and considering feasible mitigation measures. (State CEQA Guidelines § 15130; §15130(b)(3); State CEQA Guidelines

§ 15130(c)).[33] The proposed General Plan includes mitigation measures designed to reduce emissions and cancer risk overall rather than speculating as to cumulative impacts and proscribing specific mitigation measures to address these speculative impacts. See Draft EIR page 6-16 ("Application of State and MDAQMD rules and regulations and implementation of the proposed General Plan goals, policies, and actions would contribute to reducing construction-and operation-related criteria air pollutants generated from energy, area, and mobile sources to the extent feasible). The incorporation of **MM GP AQ-1** and **MM GP AQ-2** would also contribute to reducing criteria pollutants. Implementation of these rules, goals and policies, and mitigation could contribute to reducing construction- and operation-phase regional air quality impacts of future individual projects to a less than significant level."

Furthermore, per State CEQA Guideline §15130(b), an EIR's discussion of cumulative impacts should follow principles of practicality and reasonableness.[34] A Programmatic EIR's discussion of cumulative impacts need not provide the same level of detail as is provided for project-specific effects (State CEQA Guidelines §15130(b), and the lead agency is not required to provide an exhaustive analysis of cumulative impacts.[35]

S6-32 See also **Response S6-28**. As noted in **Draft EIR Section 5.3, Air Quality**, on page 5.3-2, projects exceeding the MDAQMD regional significance thresholds are conservatively considered to cumulatively contribute to the nonattainment designations of the MDAB. As a result, there are no separate mitigation measures for project-level and cumulative air quality impacts. Furthermore, air quality impacts of a General Plan are inherently cumulative in nature. Thus, **MM GP AQ-1, GP AQ-2, and GP AQ-3** are intended to mitigate the proposed General Plan's cumulative impacts. Furthermore, implementation of the proposed General Plan policies would reduce cumulative air quality emissions impacts that apply to all projects regardless of whether they exceed the MDAQMD's significance thresholds.

S6-33 See **Responses S6-28, S6-29,** and **S6-31**. The Draft EIR includes several mitigation measures to address program-level impacts associated with long-term buildout of the General Plan (see **MM GP AQ-1** through **GP AQ-3**) as well as site-specific measures for BIG (see **MM BIG AQ-1** through **BIG AQ-14**). While individual projects may result in less than significant impact, together these individual projects are cumulatively considerable. In general, air quality impacts of a General Plan are inherently cumulative in nature given the long-term buildout associated with population and employment growth in a city. Thus, **MM GP AQ-1, GP AQ-2, and GP AQ-3** are intended to mitigate the proposed General Plan's cumulative impacts despite individual projects having incremental, but less than significant impacts.

[33] See East Bay Mun. Util. Dist. v Department of Forestry & Fire Protection (1996) 43 CA4th 1113, 1129 (upholding agency policies focused on mitigation rather than speculative detailed analysis of cumulative impacts). See also Ocean St. Extension Neighborhood Ass'n v City of Santa Cruz (2021) 73 CA5th 985, 1020 (upholding EIR's finding that project's contribution to cumulative water supply impacts was mitigated by project's conservation measures and demand reduction programs).

[34] See *Golden Door Props., LLC v County of San Diego* (2020) 50 CA5th 467, 529; *Rodeo Citizens Ass'n v County of Contra Costa* (2018) 22 CA5th 214, 232; *Banning Ranch Conservancy v City of Newport Beach* (2012) 211 CA4th 1209, 1228; *City of Long Beach v Los Angeles Unified Sch. Dist.* (2009) 176 CA4th 889.

[35] *Association of Irritated Residents v County of Madera* (2003) 107 CA4th 1383, 1404; *Schaeffer Land Trust v San Jose City Council* (1989) 215 CA3d 612.

Moreover, as discussed in **Response S6-21**, the General Plan is a broad-based policy plan. The proposed General Plan policies would reduce cumulative air quality emissions impacts that apply to all projects regardless of whether they exceed the MDAQMD's significance thresholds. Thus, the policies in the General Plan guide decision makers when adopting future discretionary projects and also guide city decision-makers and staff when adopting new city-initiated projects, programs, and initiatives. Therefore, the policies of the General Plan are perhaps as powerful a tool for mitigating cumulative emissions within the city as the measures identified in the Scoping Plan are to CARB. Nonetheless, the cumulative impacts of the Barstow General Plan were conservatively identified as significant and unavoidable.

S6-34 See **Responses S6-28** through **S6-30**. Air quality impacts of a General Plan are inherently cumulative in nature. Thus, **MM GP AQ-1, GP AQ-2, and GP AQ-3** are intended to mitigate the proposed General Plan's cumulative impacts. Furthermore, implementation of the proposed General Plan policies would reduce cumulative air quality emissions impacts that apply to all projects regardless of whether they exceed the MDAQMD's significance thresholds.

S6-35 CARB expresses concern that the use of a linear single, across-the-board percentage reduction to reflect renewable diesel (RD) use underestimates air pollutant emissions from BIG. As an initial matter, an EIR's impact analysis may be based on informed judgments by experts who prepare the EIR.[36] The lead agency and its experts have discretion to determine the appropriate way to analyze environmental impacts in an EIR. Disagreements with an EIR's impact analysis would be resolved in favor of the lead agency if there is any substantial evidence in the record supporting the approach used.[37]

The use of a single, across-the-board percentage was selected because it was based on the most reliable and directly applicable source available, which was the "Renewable Diesel Fuel Effects on Exhaust Emissions from a Tier 3 GE ES44C4 Locomotive Final Report" published by CARB.[38] This CARB study constitutes substantial evidence because it presents measured exhaust emissions data generated under controlled testing conditions on line-haul locomotives, which are comparable to the line-haul locomotives evaluated for BIG.

The CARB study presented results for 100% U.S. EPA Cert Diesel, 100% CARB Diesel, 50% CARB Diesel/50% Renewable Diesel (RD), and 100% Renewable Diesel in Tier 3 line-haul locomotives. BIG locomotives are interstate line-haul; therefore, the baseline emissions were conservatively based on 100% U.S. EPA Certification Diesel, which would be representative of out of state locomotives. In order to create an apples-to-apples comparison, the analysis was limited to using the directly comparable fuel types presented in the CARB report, which are the 100% U.S. EPA Cert Diesel and 100% Renewable Diesel. The CARB report provides emissions data for the two relevant endpoint conditions (0% RD and 100% RD), so interpolation between those endpoints was used to estimate emissions at intermediate blend

[36] *Saltonstall v. City of Sacramento* (2015) 234 Cal.App.4th 549, 583.
[37] *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 409.
[38] California Air Resources Board (CARB). (2021). *Renewable diesel fuel effects on exhaust emissions from a Tier 3 GE ES44C4 locomotive: Final report*. Retrieved from: https://ww2.arb.ca.gov/sites/default/files/2021-11/Renewable_Diesel_Fuel_Effects_Locomotive_Exhaust_Emissions.pdf.

levels. While the dataset only includes two endpoints, interpolation between two measured values is a standard and accepted engineering approach when no evidence indicates non-linear behavior. In this case, no reliable evidence exists that demonstrates significant non-linearity and CARB did not provide such evidence. Additionally, the assumption of linear regression is scientifically viable, because RD and conventional diesel are fully miscible hydrocarbon fuels, and many fuel properties that influence emissions (carbon intensity, aromatic content, and hydrogen-to-carbon ratio) scale proportionally with blend fraction. For blended fuels with similar combustion characteristics such as RD and conventional diesel, emissions behavior is generally expected to vary in proportion to the blend ratio absent evidence indicating otherwise. This relationship is highlighted in the CARB study's presentation of the 50% CARB Diesel/50% RD blend, where the results show emissions trends with proportional blending behavior. Therefore, a linear interpolation between endpoints is a technically and scientifically appropriate method for estimating intermediate blend.

It is also important to recognize that all emissions modeling contains inherent uncertainty due to normalization, variability in engine operation, and fuel characteristics. The methodology used in the Draft EIR relies on published, measured emission factors from CARB's testing rather than assumed generic adjustment factors which would be speculative and scientifically inappropriate. Notably, CARB does not suggest an alternative methodology. Since the analysis is based on empirical data and sound methodology, it creates a transparent and reproducible result. The use of a linear single adjustment factor therefore reflects accepted modeling practice, is supported by substantial evidence, and does not underestimate emissions from BIG. The City, as lead agency, is entitled to deference under CEQA regarding its expert judgment on renewable diesel's emission adjustment factor, given that it is based on substantial evidence as detailed above.[39]

S6-36 CARB also asserts that a single blanket emission adjustment factor for RD is not representative of multiple locomotive tiers. As an initial matter, an EIR's impact analysis may be based on informed judgments by experts who prepare the EIR.[40] The lead agency and its experts have discretion to determine the appropriate way to analyze environmental impacts in an EIR. Disagreements with an EIR's impact analysis would be resolved in favor of the lead agency if there is any substantial evidence in the record supporting the approach used.[41]

Here, published locomotive-specific RD testing is limited, and the most directly applicable empirical study available is the CARB "Renewable Diesel Fuel Effects on Exhaust Emissions from a Tier 3 GE ES44C4 Locomotive Final Report," cited above, which provides measured emissions results. In the absence of published emissions testing for each locomotive tier, BIG relies on the best available substantial evidence.

Locomotive tiers can generally be separated into two broad categories for the purposes of this evaluation: (A) Tier 0-2 locomotives, which do not have engine aftertreatment systems, and (B) Tier 3-4 locomotives, which incorporate engine aftertreatment systems. Category A

[39] *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 409.
[40] *Saltonstall v. City of Sacramento* (2015) 234 Cal.App.4th 549, 583.
[41] *Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal.* (1988) 47 C3d 376, 409.

locomotives are more directly influenced by fuel chemistry. As a result, changes in fuel can have a proportionally larger effect. The CARB study was conducted on a Tier 3 locomotive (Category B), so applying its RD emission adjustment factors to Category A locomotives is conservative, because these locomotives are more sensitive to fuel. By applying the Tier 3-derived adjustment factors, the BIG analyses presents a conservative analysis of Category A locomotives.

While the specific emissions control technologies differ between Tier 3 and 4 engines, both tiers incorporate advanced engine controls and emissions reduction systems that substantially reduce criteria pollutant emissions. The inclusion of RD primarily affects combustion-related emissions characteristics of locomotives, and is less affected by engine aftertreatments. Engine aftertreatment systems are designed to reduce pollutants regardless of fuel type, and there are no published locomotive tests demonstrating that RD produces materially different effects in Tier 4 engines compared to Tier 3 engines. In the absence of such evidence, and given the similar functional role of advanced emissions controls in both tiers, applying the Tier 3-based RD adjustment factors to Tier 4 locomotives represents a reasonable and technically viable approach. Therefore, the BIG analysis presents the best available data and applies it in a manner that is either conservative (Category A) or representative (Category B), and the use of the single blanket emission adjustment factor does not underestimate emissions and is supported by substantial evidence. Refer also to **Response S6-35.**

S6-37 CARB states that the Draft EIR may underestimate emissions from idling switch locomotives because it relies on aggregated EPA emission factors rather than manufacturer-specific idling emission factors for the switchers proposed to operate at BIG. The Draft EIR's use of U.S. EPA locomotive emission factors for switcher idling emissions is appropriate and consistent with CEQA. An EIR's impact analysis may be based on informed judgments by experts who prepare the EIR.[42] The lead agency and its experts have discretion to determine the appropriate way to analyze environmental impacts in an EIR. Disagreements with an EIR's impact analysis would be resolved in favor of the lead agency if there is any substantial evidence in the record supporting the approach used.[43] BIG commits to Tier 4 switcher locomotives for all on-site switching, but procurement cannot occur prior to the necessary approvals being obtained. Because specific vendors, engine families, control packages, and calibration strategies are not yet selected, manufacturer specific idling emission factors do not exist for the particular locomotives that would ultimately be procured. Therefore, because the identity and make/model of the future Tier 4 switchers are presently unknown, engine specific idling factors are unavailable at this stage. Under State CEQA Guidelines § 15145, when details are not reasonably available, agencies need not speculate; if after a thorough investigation an impact parameter is too speculative to evaluate, the EIR may so state.[44, 45]

[42] *Saltonstall v. City of Sacramento* (2015) 234 Cal.App.4th 549, 583.

[43] *Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal.* (1988) 47 C3d 376, 409.

[44] *Laurel Heights Improvement Assn. v. Regents of University of California, 6 Cal.4th 1112, 1137 (1993) (where the Draft EIR concluded that the potential cumulative impacts ... are too speculative for evaluation").*

[45] *Alliance of Small Emitters/Metals Industry v. South Coast Air Quality Management Dist.* (1997) 60 Cal.App.4th 55, 67 (an EIR need not engage in 'sheer speculation' as to future environmental consequences) (citing *Marin Mun. Water Dist. v. KG Land California Corp.* (1991) 235 Cal.App.3d 1652, 1 Cal.Rptr.2d 767).

Using U.S. EPA Tier specific factors is a widely accepted, conservative, and transparent surrogate until vendor data are available. U.S. EPA's "Emission Factors for Locomotives—Technical Highlights" (U.S. EPA-420-F-09-025) provides emission rates derived from certification standards and in-use information, with explicit caution to treat the values as average approximations and to recognize variability. In the absence of unit-specific data, applying the Tier 4 emission factors from this U.S. EPA guidance is a reasonable, standardized method to quantify idling emissions for the planning level CEQA analysis (see U.S. EPA 420-F-09-025; see also FRA's LECT documentation, which likewise relies on U.S. EPA 420-F-09-025 as the primary source for locomotive emissions rates.[46]

The analysis meets CEQA's "rule of reason" and adequacy standards. CEQA requires an EIR to provide sufficient information for informed decision making; it need not be exhaustive or perfect, and disagreement among experts does not render an EIR inadequate. The Draft EIR used a recognized methodology, disclosed assumptions, and applied Tier appropriate factors to represent idling for future Tier 4 switchers. This satisfies State CEQA Guidelines §15151's standard of adequacy.

S6-38 The issue identified by the commenter reflects a difference in the purpose and methodology used in the air quality emissions analysis compared to the operational fueling information presented in **Draft EIR Table 3-10: BIG Estimated Switcher Locomotive Fueling Events** (page 3-48). These two data sets serve different analytical functions and are not intended to represent the same metric. The locomotive emission rates in EPA-420-F-09-025 are derived directly from the federal locomotive emission standards codified at 40 CFR Part 1033 and are expressed in grams per brake horsepower-hour (g/bhp-hr). Federal regulations define and enforce locomotive exhaust standards in g/bhp-hr, reflecting emissions as a function of engine power output and duty cycle rather than fuel delivery or fuel use. Consistent with U.S. EPA guidance, the use of g/bhp-hr factors combined with conservative assumptions regarding hours of operation and engine load provides a reasonable and accepted method for bounding potential locomotive emissions under reasonably foreseeable operating conditions without understating impacts.

CEQA requires an EIR to focus on identifying and disclosing the direct and indirect environmental effects of a project over short- and long-term conditions (CEQA Guidelines § 15126.2(a)) and expressly allows the use of forecasting and assumptions where future operational details are uncertain (CEQA Guidelines § 15144). Consistent with U.S. EPA locomotive emissions guidance, which bases inventories on brake-horsepower activity rather than fuel delivery metrics (EPA-420-F-09-025), the Draft EIR employs conservative, activity-based assumptions to ensure that potential locomotive emissions are not understated and are bounded under reasonably foreseeable worst-case operating conditions.

As noted above, switcher fuel consumption shown in **Draft EIR Appendix 5.3 BIG-1** was estimated based on U.S. EPA conversion factors in EPA-420-F-09-025 and conservative operational assumptions to be used specifically for air quality emissions purposes.

[46] https://railroads.fra.dot.gov/sites/fra.dot.gov/files/2024-09/Locomotive%20Emissions%20Comparison%20Tool_Emissions%20Data%20Documentation_Sep2024_PDFa.pdf, p. 3.

Conservatively, these estimates capture a worst-case scenario that exceeds fuel specific estimates (i.e., not based on air emissions estimates) described in the Project Description. However, in the interest of full disclosure and in order to fully address the comment, the switcher modeling inputs were adjusted match the fuel consumption numbers identified in the comment; see **Final EIR Appendix 3-1: Emissions Errata**.

Because the analysis intentionally assumed high utilization rates and sustained engine output, the implied fuel consumption, when back calculated using U.S. EPA's brake horsepower hours per gallon conversion factors (U.S. EPA 420-F-09-025, Table 3), is substantially higher than expected fuel usage under actual railyard operating conditions.

CEQA does not require an EIR to rely on actual fuel delivery data where emissions can be reasonably estimated using conservative operational assumptions and accepted emission factors. An EIR need only provide a good faith, reasonable disclosure of impacts, not a precise accounting of fuel usage (State CEQA Guidelines §15151).

Draft EIR Table 3-10 (page 3-48) ("BIG Estimated Switcher Locomotive Fueling Events") was prepared to describe anticipated fueling logistics, such as the frequency and average volume of fuel delivered to switcher locomotives. **Draft EIR Table 3-10** (page 3-48) is not intended to reflect emissions modeling inputs. The 247 gallons per day value represents an average fueling amount per switcher based on realistic operational needs and does not represent continuous daily fuel consumption at maximum engine output, or a direct input to the air quality emissions calculations. As such, **Table 3-10** (page 3-48) should not be compared directly to the fuel consumption implied by the conservative air quality modeling assumptions. The table is informational and operational in nature, whereas the emissions analysis intentionally applies conservative assumptions to ensure that potential impacts are not underestimated.

The conservative air quality modeling assumptions intentionally overestimate, not underestimate, emissions. The air quality analysis assumes higher hours of switcher operation than would typically occur and sustained engine loads that exceed average real world switching conditions. If switcher activity levels were adjusted downward to align with the realistic fuel consumption reflected in **Draft EIR Table 3-10** (page 3-48), the result would be lower brake horsepower hours and correspondingly lower emissions of criteria pollutants and diesel particulate matter. Therefore, the current analysis is conservative and likely overstates actual operational emissions.

Courts have consistently held that CEQA permits, and often favors, the use of conservative assumptions to avoid understating impacts. An EIR is not inadequate simply because it does not precisely mirror future operations, so long as it reasonably discloses potential impacts.[47] Further, the lead agency and its experts have discretion to determine the appropriate way to analyze environmental impacts in an EIR. Disagreements with an EIR's impact analysis would

[47] *Citizens for a Sustainable Treasure Island v. City and County of San Francisco* (2014) 227 Cal.App.4th.

be resolved in favor of the lead agency if there is any substantial evidence in the record supporting the approach used.[48]

S6-39 The Commenter expresses concern that BIG may relocate Tier 4 locomotives from other rail facilities or regions to the BIG Project area, potentially leading those sites to rely on higher-emission locomotives and causing indirect air quality impacts. As noted in **Consolidated Response 13** concerning requests for additional analysis and substantial evidence, commenters are advised to support assertions that the lead agency should conduct additional analysis or review with data or other factual references. This is because the lead agency's CEQA conclusion must be based on substantial evidence in the record and not speculation. Here, the commenter has not pointed to any facts or data that support its contention that the Draft EIR's analysis is flawed. Nonetheless, in addressing commenter's concerns, the Tier 4 Dedicated Fleet would be a binding and enforceable commitment, as explained in **Consolidated Response 12-03** concerning enforceability of the Project components and mitigation measures for the Project. Further, the Dedicated Fleet would comprise only newly purchased locomotives. See **Consolidated Response 12** concerning the Project Description and enforceability.

BIG does not reduce Tier 4 line-haul locomotive availability elsewhere, nor does it increase the use of lower tier line-haul locomotives in the standard fleet; therefore, would not result in a reasonably foreseeable indirect physical change in the environment under CEQA (Pub. Res. Code § 21065; State CEQA Guidelines § 15358(a)(2)). The "dedicated fleet" approach ensures that the availability of Tier 4 line-haul locomotives operating at the BIG area are independent of the existing fleet serving other locations.

Further, all Project switcher locomotives at BIG would be newly purchased Tier 4 locomotives, not pulled from applicant's existing national fleet. See **Consolidated Response 12** concerning the Project Description and enforceability and **Consolidated Response 12-03** concerning enforceability of the Project components and mitigation measures for the Project. Finally, as part of BIG, the applicant has agreed to "remove from service in California all fifteen (15) Existing Barstow Yard Locomotives and replace them with six (6) higher horsepower minimum rated Tier 4 locomotive engines on or before the first day of rail operations at BIG."

S6-40 The commenter notes an apparent inconsistency in the captive (dedicated) fleet locomotive counts shown in one worksheet of the modeling files. This discrepancy results from a typographical error in that single sheet. The numbers identified by the commenter were not used to determine the actual size of the dedicated fleet and do not represent the number of Tier 4 locomotives modeled for BIG. Instead, those values were only used to calculate fleet-mix percentages.

Critically, this typographical error does not affect the modeling results. All dedicated fleet locomotives are assumed to meet Tier 4 standards in every analysis year, meaning the Tier 4 share remains 100 percent regardless of the numeric value shown in the percentage-calculation sheet. The modeling correctly relies on the actual dedicated fleet

[48] *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 409.

counts presented in the "Dedicated Fleet" worksheets, which contain the accurate values: 14 locomotives in 2028, 19 in 2033, and 22 in 2048. Additionally, the typographical error is in one sheet of the modeling files, but was not included in the model data included in the Draft EIR appendix (i.e., **Draft EIR Appendix 5.3 BIG-1**). Because the emissions modeling is based on these correct dedicated fleet totals, and because all dedicated locomotives are Tier 4, the minor typographical error does not influence any air quality results or conclusions in the Draft EIR.

S6-41 This comment provides a general summary and conclusion regarding the comments raised prior in this letter. See **Response S6-2** through **S6-40**.

S6-42 This comment provides a general summary and conclusion regarding the comments raised prior in this letter. See **Response S6-2** through **S6-40**.

S6-43 This comment provides a general summary and conclusion regarding the comments raised prior in this letter. See **Response S6-2** through **S6-40**.

COMMENT LETTER S7

S7

CALIFORNIA STATE TRANSPORTATION AGENCY GAVIN NEWSOM, GOVERNOR

California Department of Transportation

DISTRICT 8
464 WEST 4TH STREET
SAN BERNARDINO CA, 92401
(909) 963-8604
www.dot.ca.gov

January 05, 2025

Route & Postmile: 15U/72.847L
Cross Street: Citywide Plus Sphere of Influence (SOI).
GTS ID: 38618

City of Barstow
Community Development
Attn: Chris Heldreth
220 East Main Street, Suite A
Barstow, CA 92311

Subject: Comments on the Draft Environmental Impact Report (EIR) for City of Barstow General Plan and Barstow Gateway Project

The California Department of Transportation (Caltrans), District 8, Local Development Review (LDR) branch, has completed its review of the Draft Environmental Impact Report (EIR) and related documents for the proposed City of Barstow General Plan and Barstow International Gateway Project.

The proposed project consists of a comprehensive General Plan Update (GPU) for the City of Barstow and the Barstow International Gateway (BIG) Specific Plan, proposed by BNSF Railway, Located in western San Bernardino County within the City of Barstow and its Sphere of Influence. The project area is generally bounded by the Mojave River to the north, Main Street to the South, Lenwood Road to the east, and Hinkley Road to the west. The proposed project involves updating the City's General Plan to establish a 25-year planning horizon from 2023 to 2048 and to provide long-term land use, circulation, and infrastructure policies to accommodate future growth. The proposed project also consists of the development of the BIG Specific Plan, which encompasses an approximately 5,000-acre integrated, rail-served logistics facility. Major Project components include a block swap rail yard, an intermodal facility, approximately 9 million square feet of transload warehouse space, and a private solar energy facility, as well as approximately 600 acres of offsite rail and non-rail improvements, such as roadway, drainage, and utility upgrades. The proposed project involves a closed-loop, rail-to-warehouse operational design that relies primarily on rail and zero-emission electric hostlers, thereby reducing truck trips. As a result, the proposed project is expected to generate lower Vehicle Miles Traveled (VMT) compared to conventional logistics facilities. The proposed project would operate 24 hours per day, 365 days per year, with environmental review conducted through a single Environmental Impact Report and phased development expected through buildout in 2048. S7-1

Based on the information presented in the environmental documents available for public review, we submit the following comments and recommendations for your consideration. S7-2

1

Transportation Planning:

1. Based on the Land Use section analysis, this does not appear to be the case; however, if the BIG project would result in the demolition of existing residential dwelling units (approximately 108 units currently exist), the project may not be consistent with Assembly Bill (AB 98) unless those units are replaced with affordable housing at a 2:1 ratio. S7-3
2. To further support mode shift objectives, the city should consider amending the General Plan Non-Motorized Circulation Maps to upgrade Lenwood Rd. County Club Drive, Highpoint Parkway, and potentially other key corridors to Class IV separated bicycle facilities. S7-4

System Planning:

3. The Project Summary identifies the project category as Freight yet lists "Freight Trips: None noted" and does not summarize anticipated freight activity associated with the BIG facility. Given the scale and intermodal nature of the proposed project, please clarify how freight truck activity was considered in the transportation analysis and provide a qualitive or quantitative summary of expected freight movement to support the Draft EIR's circulation and access conclusions. S7-5
4. Information identifies substantial citywide growth under the proposed General Plan through 2048 (households, jobs, and non-residential development). Please clarify how these growth projections are reflected in the transportation analysis and how the Draft EIR ensures that Transportation system implications of this growth, particularly when combined with the BIG freight facility, are addressed at a programmatic planning level. S7-6
5. While the Draft EIR appropriately applies Senate Bill (SB 743) and identifies VMT as the primary CEQA transportation metric, the document should more clearly explain how freight-related circulation, operation conflicts and access issues associated with the BIG facility are evaluated and addressed, particularly given that Loss of Service (LOS) is not used as a significance criterion. This clarification would improve transparency regarding freight system impacts. S7-7
6. The Draft EIR indicates that during construction, reconstruction/realignment of Hinkley Rd. and Jiggs Rd. would eliminate Fire Station 4's direct access via Main Street for approximately 30 months, with access instead provided via State Route (SR)-58. Please strengthen the Draft EIR by identifying specific construction-phase commitments to maintain emergency access, including coordination measures and traffic control considerations during this extended period. S7-8
7. The Draft EIR indicates that dedication and vacation of right-of-way would occur along Main Street and Lenwood Rd. Please clarify the extent of these actions, describe their implications for circulation and access, and identify the responsible agencies and approval process to ensure transportation system impacts are fully disclosed. S7-9
8. The Draft EIR references Complete Streets and multimodal planning requirements but does not clearly describe how these policies will be implemented in areas serving the BIG freight facility. Please clarify how multimodal considerations will be incorporated into circulation planning near primary BIG access routes to ensure consistency with adopted policy objectives. S7-10
9. The Draft EIR describes the BIG facility as spanning incorporated City areas and unincorporated County areas proposed for annexation. Please clarify agency responsibilities for transportation improvement and ongoing operations across these jurisdictions to ensure coordinated and implementable transportation planning. S7-11

Complete Street:

10. Comments pertaining to the Barstow International Gateway Specific Plan on page(s): S7-12

a. 2-4 through 2-7: Change in grade/slope as well as proposed mainline may necessitate construction traffic. Such construction traffic may include trucks that transport earthen material to and from project site. Mitigation measures such as sweeper trucks, etc. may need to be implemented to reduce inconveniences associated with transportation of aggregate material. Loose material on roadways has potential to cause injuries to bicyclists, scooter riders, motorcyclists and other vehicles with less than four wheels. Loose materials can also become airborne, potentially damaging property including windshields, as well as other vehicles on surrounding roadways and freeways. S7-12 cont'd

b. 2-17: Removing the direct connection between Hinkley Rd. and Main St. on the southern side of the project site will lead to additional VMT as vehicles that would ordinarily turn south onto Main St. will have to do so at a new connection at Lenwood Rd., adding approximately 10 miles to travel what is currently a distance of one mile. Preserving the direct connection between the southern portion of Hinkley Rd. to Johnston's Corner at Main St. Should be considered to ensure adequate circulation. Given the realignment to Jiggs Rd., will there be a connection between Hinkley Rd. and Main St.? S7-13

c. 2-17: Victor Valley Transit Authority Route 3 would be affected with proposed street realignment. Coordination and mitigation with Victor Valley Transit Authority (VVTA) should be ensured so that transit service is not adversely impacted. Transit stops should be sited at the access points of the project site. S7-14

d. 2-18 and 2-19: Pedestrian crossings, bicycle passage and detection should be considered with signalized intersections. Along roadways where shoulder rumble strips are proposed, such should be implemented per Standard Plan A40H; rumble strip placement with gaps for bicycles, to ensure consistency. S7-15

e. 2-22 and 2-23: Suggest 8'(inch) shoulder bicycle lane be striped as 6 (inch) bicycle lane and 2' (inch) striped buffer to deter vehicles from driving on the shoulder bicycle lane. Suggest wider bicycle lane across Lenwood Channel Bridge per existing 55mph speed limit and guide outlined in HDM index 301.2. S7-16

11. To achieve transportation demand management towards a reduction in VMT, incentives should be targeted to encourage people to walk, bicycle, rideshare or utilize transit. All users at this location should have an option to be provided with financial or equipment incentives, including commute assistance (through IE Commuter), complimentary transit passes or subsidized bicycle purchases. If not already considered in the site plan, changing/locker rooms and secure bicycle storage areas are among amenities that may encourage bicycle travel and reduce vehicular parking need. S7-17

Traffic Operations:

General:

12. Please provide a Civil PE stamp on the Barstow International Gateway CEQA Assessment—Transportation Analysis and the Level of Service Assessment—Transportation Analysis. S7-18
13. Please provide truck turning templates for the state facilities, i.e., the I-15 and Lenwood Rd interchange, SR-247 (Barstow Rd) and Armory Rd intersection, and SR-58 and Main St Interchange. S7-19
14. Please include a response to the review comments memorandum for your next review submittal. S7-20

Safety Reviews:

15. Please provide traffic safety review as a stand-alone report for proposed land use projects S7-21

and plans affecting the State Highway System. Please analyze the SR-58 and Main St interchange, I-15 and Lenwood Rd interchange and SR-247 (Barstow Rd) and Armory Rd intersection. See the attached Local Development Review (LDR) Safety Review Practitioner's Guidance.

a. Please analyze the existing crash data and discuss project's impact on safety as needed.
b. To request crash data on the State Highway System, please submit your request via our California Public Records Act (CPRA) portal at mycusthelp.com.
c. Provide appropriate countermeasures (if any) to mitigate/reduce project's impact.

S7-21 cont'd

Stormwater Compliance:

16. The Caltrans permit is applicable to portions of a project that involve modification to State Highways. Caltrans operates under a permit (**Order 2022-0033-DWQ**) that regulates stormwater discharge from Caltrans properties, facilities, and activities and requires Caltrans construction program to comply with the adopted statewide CGP. The permit requires Caltrans to implement a year-round program in all parts of the State to control stormwater and non-stormwater discharges effectively. The Caltrans permit is applicable to portions of a project that involve modifications to State Highway.

S7-22

Equitable Access:

If any Caltrans facilities are impacted by the project, they must comply with the American Disabilities Act (ADA) Standards upon project completion. Additionally, the project must ensure the maintenance of bicycle and pedestrian access throughout the construction phase. These access considerations align with Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

S7-23

Caltrans Encroachment Permit:

Please be advised that any permanent work or temporary traffic control that encroaches onto Caltrans' Right-of-Way (R/W) requires a Caltrans-issued encroachment permit.

For information regarding the Encroachment Permit application and submittal requirements, contact:

Caltrans Office of Encroachment Permits
464 West 4th Street, Basement, MS 619
San Bernardino, CA 92401-1400
(909) 383-4526
D8.E-permits@dot.ca.gov
https://dot.ca.gov/programs/traffic-operations/ep
Important Note: All permit applications must now be submitted through our CEPS Online Portal at: https://ceps.dot.ca.gov/

S7-24

Please be advised that LDR's point of contact role will conclude upon the completion of the development entitlement process. Once the project is entitled, the Encroachment Permit Office will serve as the primary point of contact moving forward.

Thank you again for including Caltrans in the review process. Should you have any questions regarding this letter, or for future notifications and requests for review of new projects, please email LDR-D8@dot.ca.gov or call 909-963-8604.

S7-25

Sincerely,

Janki Patel

Janki Patel
Branch Chief - Local Development Review
Division of Transportation Planning
Caltrans District 8

5

RESPONSE TO COMMENT LETTER S7, CALIFORNIA DEPARTMENT OF TRANSPORTATION (CALTRANS)

The City acknowledges Caltrans' role as a Responsible Agency and its ability to exercise its own judgment regarding the Final EIR's adequacy in accordance with State CEQA Guidelines § 15096(e). A discussion related to Caltrans' jurisdiction relevant to BIG is included in **Draft EIR Section 3.0: Project Description** and **Draft EIR Sections 5.1** through **5.17**, as appropriate. The anticipated Caltrans approvals are listed in **Draft EIR Table 3-16: Proposed General Plan Permits and Approvals** (page 3-92) and **Table 3-17: BIG Permits and Approvals** (page 3-93). Per CEQA, a responsible agency should provide substantive comments, supported by specific documentation, regarding those project activities within an area of expertise of the agency or that are required to be carried out or approved by the agency. (Pub. Resources Code, § 21153(c).) Consistent with this, the City has carefully reviewed Caltrans' comments on the Draft EIR and, where necessary, revised the EIR accordingly, except as otherwise explained in the responses to comments below.

S7-1 Commenter raises some concerns about the Draft EIR's analysis that are best addressed by sharing technical and scientific information, which is provided below. This is introductory to the comments that follow. See also **Consolidated Response 04** concerning general non-CEQA issues.

S7-2 This is introductory to the comments that follow. See also **Consolidated Response 04** concerning general non-CEQA issues.

S7-3 The comment raises an issue of consistency with AB 98, a California law that established new standards for certain warehousing and distribution facilities. AB 98 only applies to "logistic use development," which does not include retail facilities, facilities that are served primarily by rail, or a Strategic Intermodal Facility as defined by AB 98. (See California Government Code § 65098(d).) As explained in **Draft EIR Section 3.0, Project Description**, BIG proposes a Strategic Intermodal Facility, as the term is used in AB 98, and, thus, the standards under AB 98 are not applicable. Also, AB 98 does not apply to existing facilities or proposed project applications submitted prior to September 30, 2024. The NOP was published in February 2024.

S7-4 Caltrans has requested that the City consider amending the General Plan Non-Motorized Circulation Maps to upgrade Lenwood Rd. County Club Drive, Highpoint Parkway, and potentially other key corridors to Class IV separated bicycle facilities. The City will augment the definition of "Class I Multipurpose Trail" in the proposed General Plan Circulation and Mobility Element Table CM-2. Bikeway Classifications, to include the following language that will help enhance bicycle safety for Class I facilities at intersections. "Approaching intersections, the bicycle portion of trails should extend toward the curb to elevate visibility and awareness of bicyclists and vehicles." The City will also augment Implementation action IMP-CM-1 with the following: "Update the ATP to identify and illustrate where bicycle pathway components of Class I Multipurpose Trails should extend toward the curb when approaching the intersection to elevate visibility and awareness of bicyclists for vehicles, particularly along Lenwood Road and Veterans Parkway."

S7-5 The City is not aware of what report or section the commenter references regarding: "Freight Trips: None noted." Freight truck activity is described and analyzed as it relates to transportation throughout the Draft EIR. Freight truck activity is described in detail in **Draft EIR Appendix 5.15 BIG-1 CEQA Assessment – Transportation Analysis Section 8.1 Truck Miles Traveled**. Additionally, freight truck activity and related traffic operations analysis are discussed in detail in **Draft EIR Appendix 5.15 BIG-2 LOS Assessment – Transportation Analysis Section 3.2 Trip Generation, Distribution, and Assignment Methodology** and **Section 5.0 Plus BIG Conditions** for a detailed discussion of BIG truck trip generation, distribution, and assignment and traffic operations analysis.

S7-6 BIG's transportation analysis is addressed in detail in **Draft EIR Appendix 5.15 BIG-1 CEQA Assessment – Transportation Analysis** and **Appendix 5.15 BIG-2**. BIG and the City coordinated extensively regarding the forecast future growth reflected in the horizon year San Bernardino Transportation Analysis Model Plus (SBTAM+). BIG's transportation analysis reflects the forecast growth noted in the proposed General Plan, as reflected in the City's latest SBTAM+. SBTAM+ is described in detail in **Draft EIR Appendix 5.15 BIG-1 Section 6.3 Methodology for Impact Analysis** (page 90):

> "The City also revised the future year model to reflect forecast 2048 (the proposed General Plan horizon year) land use, employment, and roadway conditions within the proposed General Plan area (i.e., the City and it's SOI), including BIG."

Draft EIR Appendix 5.15 BIG-2 Section 3.3 Analysis Scenarios (page 55-57) further discusses the methodology used to develop traffic volume for the future conditions baseline.

S7-7 Traffic operations were assessed for consistency with applicable LOS standards. Detailed traffic operations analysis is included in **Draft EIR Appendix 5.15 BIG-2.** See **Draft EIR Appendix 5.15 BIG-2 Section 3.2: Trip Generation, Distribution, and Assignment Methodology** and **Section 5.0: Plus BIG Conditions** for a detailed discussion of BIG truck trip generation, distribution, and assignment and traffic operations analysis. **Draft EIR Appendix 5.15 BIG-2 Section 6.0: Plus BIG Transportation Modifications** discusses BIG's proposed transportation modifications to avoid inconsistency with applicable LOS standards.

Freight circulation and access is reviewed in **Draft EIR Appendix 5.15 BIG-1. Draft EIR Appendix 5.15 BIG-1 Table 24: City Proposed General Plan Circulation Map Conflict Evaluation** (page 116) and **Table 34: Barstow Proposed General Plan Conflict Evaluation** (page 146) review existing and planned truck routes within the vicinity of BIG. Heavy-duty truck traffic accessing BIG would only use designated truck routes.

S7-8 **Draft EIR Appendix 5.15 BIG-1 Section 7.4 Emergency Impact Evaluation** (page 126-128) discusses the Emergency Access Impact Evaluation during construction. As noted in this section, emergency access from Station 56 and Station 4 to the Hinkley Road area would be provided from the north during BIG's construction phase, emergency response assistance could be provided (e.g., from Station 366 and other jurisdiction resources) when needed through the mutual aid agreements, and construction-related access interruptions are temporary (access to the Hinkley Road area would be restored once construction of realigned

Hinkley Road and Jiggs Road is complete). Additionally, BIG's contractor would prepare and implement a TCP (traffic control plan), which would minimize the impact of BIG's construction activities (e.g., road and lane closures) and construction traffic on nearby land uses. Therefore, BIG's impacts concerning emergency access during the construction phase would be less than significant.

Draft EIR Appendix 5.15 BIG-1 Section 7.2 Circulation System Conflict Evaluation (page 96-97) discusses the TCP in more detail:

"Consistent with City standards and construction best practices, the contractor would prepare a detailed Traffic Control Plan (TCP) pursuant to City of Barstow Standard Plan 138 requirements to minimize the impact of construction activities and construction traffic on adjoining and nearby roadways and land uses. A TCP is required for any work in the public right-of-way and would show how to safely manage vehicles, bicyclists, and pedestrians through or around construction zones. The TCP would be prepared in close consultation with the City, local law enforcement, and Fire District officials.

The City would review and approve the TCP before commencement of any construction activities. The County would review and approve the TCP portions relevant to work within County right-of-way before commencement of construction activities within County right-of-way. The TCP must adhere to the California Manual on Uniform Traffic Control Devices (Caltrans, 2025), which outlines standards for temporary traffic control devices, equipment placement, and personnel, with specific requirements set by the City or County. Key elements of the TCP include maps of the work area, placement of signs, temporary traffic control devices (cones, barricades, channelizers), equipment, and personnel like flaggers. In instances of long-term lane closures, additional elements (e.g., temporary striping, contra-flow, or crash cushions) would be required. The use of a TCP is a typical best practice.

The contractor's exact means and methods are not yet detailed, but the TCP would require provisions to minimize access disruption to residents, businesses, customers, delivery vehicles, and buses to the extent practicable (and where road closures are required during construction, limit to the hours that are least disruptive to access for the adjacent land uses), provisions for 24-hour access by emergency vehicles, and safe vehicular and pedestrian access to local businesses and residences during construction."

S7-9 The **BIG Specific Plan Table 2-4: Roadway Configurations and Improvements at Buildout** describes the limits of the BIG Specific Plan area frontage along Main Street and Lenwood Road where right-of-way would be dedicated or vacated to provide for the buildout condition of the roadway. Along the BIG Specific Plan area frontage, Lenwood Road would remain within the City of Barstow ("City"). Along portions of Main Street which are fully within the BIG Specific Plan area, the full width of the roadway would be within the City's jurisdiction. Other portions of Main Street which are only bounded by the BIG Specific Plan area on the northern side would be split down the centerline between the City and the County of San Bernardino ("County"), with the northern half-width of the roadway within the City and the southern half-

width within the County. The City would be the responsible agency for both Lenwood Road and Main Street along the full length of the BIG Specific Plan area frontage.

S7-10 **Draft EIR Appendix 5.15 BIG-1** includes a circulation conflict evaluation to determine if BIG would "Conflict with a program, plan, ordinance, or policy addressing the circulation system including transit, roadway, bicycle and pedestrian facilities" pursuant to State CEQA Guidelines Appendix G: Environmental Checklist Form; see **Draft EIR Appendix 5.15 BIG-1 Section 7.2 Circulation Conflict Evaluation** (page 96-125). **Table 24: City Proposed General Plan Circulation Map Conflict Evaluation** (page 98) and **Table 25: City and County Bicycle Facilities Map Conflict Evaluation** (page 99) summarize BIG's proposed active transportation improvements and the bicycle facilities conflict evaluation. **Draft EIR Appendix 5.15 BIG-1 Table 26** (page 101) through **Table 36** (page-125) provide an analysis of BIG's potential to conflict with relevant policies, plans, ordinances, and programs.

Consistent with the City's proposed General Plan and BIG's Specific Plan, BIG proposes to install approximately 2 miles (1 mile in each direction) of Class II bike lanes along Main Street between Lenwood Road and Country Club Drive (BIG's IMF driveway). This would provide a continuous bicycle connection from Barstow's downtown to BIG. BIG also proposes to construct a sidewalk on the north side of the street along this same stretch of Main Street. Additionally, BIG proposes to construct approximately 5 miles of multi-use path (16-foot wide, stabilized decomposed granite) along the proposed Hinkley Road.

S7-11 The City would be the responsible agency for both Lenwood Road and Main Street along the full length of the BIG Specific Plan area frontage, including the full width of Main Street where only the northern half-width is within City right of way. Ultimately, maintenance responsibilities are being discussed between the City and County and would not cause environmental impacts; therefore, detailed descriptions are not included in the Draft EIR.

S7-12 Mitigation of fugitive dust emissions during BIG construction is discussed on **Draft EIR Section 5.3** (page 5.3-104) in **MM BIG AQ-1**. Additionally, sweeping of paved areas during operations is discussed on **Draft EIR Section 5.3** (page 5.3-106) in **MM BIG AQ-7.**

S7-13 It is not feasible to provide a connection from Hinkley Road to Main Street due to the proposed number of tracks that run through this portion of the rail yard. Additionally, based on existing ADT and turning movement counts presented in **Draft EIR Appendix 5.15 BIG-2** (page 77) (ADT) and **Appendix 5.15 BIG-2** (page 81) (turning movement counts), the realigned portion of Hinkley Road experienced only 410 daily trips with just 78 peak hour trips. Such low volumes do not result in significant VMT, which is supported by the results of the analysis of **Draft EIR Section 5.15: Transportation Impact 5.15-2** (page 5.15-67).

See **Consolidated Response 05** concerning feasible and enforceable mitigation including applicable legal standards.

S7-14 Comment noted. BIG plans to coordinate with VVTA.

S7-15 Improvements within the Specific Plan Area would meet Specific Plan standards. Improvements outside the Specific Plan Area would follow the relevant agency (City, County, Caltrans) standards as stated on **Draft EIR (**page 5.15-68**)**.

S7-16 The proposed General Plan proposes implementing the planned facilities in the relevant multimodal planning documents including the proposed General Plan, which is discussed in **Table 24: City Proposed General Plan Circulation Map Conflict Evaluation** on **Draft EIR Table** (page 5.15-98), and the City of Barstow Active Transportation Plan, San Bernardino County Non-Motorized Transportation Plan Update, and the San Bernardino Countywide Transportation Plan, as discussed in **Table 25: City and County Bicycle Facilities Map Conflict Evaluation** on **Draft EIR** (page 5.15-99).

Striping plans would be modified to include a 2' buffer and 6' bike lane along Main Street.

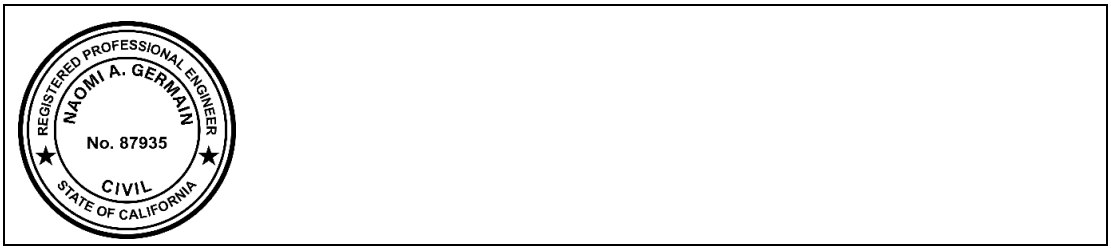
The bridge deck of the Main Street Lenwood Channel Bridge is constrained to 80' due to seeking to best manage drainage from offsite flows during heavy rains, as well as property acquisition constraints. In order to provide the required 8' sidewalks and 12' drive lanes required for a primary arterial within the City of Barstow, in addition to two 2' barriers between the roadway and the sidewalk and two 1' railings on either side of the bridge, 5' bike lanes are the maximum allowable width.

S7-17 Proposed General Plan Policy CM-2.10 VMT reduction, promotes new development and transportation demand management (TDM) strategies that will reduce household and employment vehicle miles traveled (VMT). This would include the incentives mentioned in the comment letter. However, as explained on Draft EIR pages 5.15-65 to 5.15.66, the effectiveness and applicability of these strategies as project-level mitigation would depend on the context, scale, and significance of individual future development projects, and, as a result, are uncertain. Again, this would include the incentives suggested by the comment. As a result, the General Plan's impacts are expected to be significant and unavoidable despite the implementation of these policies.

Regarding BIG, BIG's VMT effects are summarized in **Draft EIR Table 5.15-18: BIG VMT Effects Summary** (page 5.15-66). As discussed in **Draft EIR Impact 5.15-2** (page 5.15-67), BIG is expected to have a less than significant impact on VMT, and therefore no VMT mitigation is required.

S7-18 Civil PE stamps for **Draft EIR Appendix 5.15 BIG-1** and **Appendix 5.15 BIG-2** would be included in the **Final EIR Section 3.0: Errata to the Draft EIR**.

Add the following stamp to the cover of **Draft EIR Appendix 5.15 BIG-1**:



Add the following stamp to the cover of **Draft EIR Appendix 5.15 BIG-2**:



S7-19 Truck turning templates would be included in the record and submitted to CalTrans.

S7-20 Responses to these comments are included in the EIR record as required by CEQA.

S7-21 BNSF has submitted a technical memorandum to the City in response to Caltrans comment S7-21, *Barstow International Gateway (BIG) – Caltrans Traffic Safety Review* ("*Supplemental Traffic Safety Review*").

The *Supplemental Traffic Safety Review* was completed in accordance with the *2024 LDR Safety Review Practitioner's Guidance* and reviewed changes to predicted crash rates and crash patterns with the addition of BIG's forecast traffic at the following state highway system (SHS) facilities: Interstate 15 (I-15) at Lenwood Road interchange, State Route (SR) 58 at Main Street interchange, and SR-247 (Barstow Road) at Armory Road intersection. Predicted crash rates were calculated using the Interactive Highway Safety Design Model (IHSDM) (a tool developed from the Highway Safety Manual).

As noted in *Supplemental Traffic Safety Review*, BIG would not make physical geometric modifications to SHS or within the Caltrans right-of-way; therefore, BIG would not create the potential for safety risks associated with physical modifications to the SHS right-of-way. Furthermore, BIG would not introduce incompatible use of the roadways (such as by farm equipment), therefore, BIG would not have a potentially significant impact under the EIR's traffic-safety impact threshold, 5.15-34 that would potentially require mitigation under CEQA. Nevertheless, BIG would increase passenger vehicle and heavy-duty truck trips within the SHS and so, although not required by CEQA, BIG would consider implementing safety countermeasures (not mitigation measures under CEQA) if the addition of BIG's traffic would introduce a new crash type or greatly change the predicted crash patterns. Predicted IHSDM crash patterns remain similar and crash-rate changes are incremental and reflect higher future volumes under unchanged geometry and controls. Therefore, BIG does not currently propose safety countermeasures for the SHS facilities analyzed in the *Supplemental Traffic Safety Review*.

S7-22 Comment noted. The Project would acquire all necessary and applicable permits prior to modification of a State highway, including all those associated with the statewide Construction General Permit.

S7-23 Comment noted. The Project would comply with applicable federal and state law, including American Disability Act (ADA) standards.

S7-24 Comment noted. The Project would comply with applicable federal and state law, and as discussed in **Draft EIR Section 3.0: Project Description**, the Project would submit all necessary permit applications required for public and private development projects.

S7-25 See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER S8

CDFW's Comments on Barstow Gateway International MND (SCH# 2024020501)

Castaneda, Cindy@Wildlife <Cindy.Castaneda@Wildlife.ca.gov>

Mon 1/12/2026 3:50 PM

To: Chris Heldreth <cheldreth@barstowca.org>; GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

Cc: State.Clearinghouse@lci.ca.gov <state.clearinghouse@lci.ca.gov>; Shannon Mindeman <shannon@rocksbio.com>; Jakubowski, Scott@Wildlife <Scott.Jakubowski@Wildlife.ca.gov>;

1 attachments (855 KB)

2024020501_EIR_Barstow International Gateway.docx.pdf;

[NOTICE: THIS IS AN EXTERNAL EMAIL]
Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!

This sender is trusted.

Hi Chris,

Please see attached for CDFW's comments on Barstow Gateway International MND (SCH# 2024020501).

Thank you,

Cindy Castañeda
Senior Environmental Scientist (Supervisor)
California Department of Fish and Wildlife
Inland Deserts Region | Mojave Unit
3602 Inland Empire Blvd, Suite C-220
Ontario, CA 91764
(909) 544-1177 (cell)

Docusign Envelope ID: A5E10FCE-02CE-4B8D-89B2-523013A0A4C1

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Inland Deserts Region
3602 Inland Empire Boulevard, Suite C-220
Ontario, CA 91764
http://www.cdfw.ca.gov

GAVIN NEWSOM, Governor
VALERIE TERMINI, Acting Director

January 12, 2026
Sent via email

Chris Heldreth
Community Development Director
City of Barstow
220 East Main Street, Suite A
Barstow, California, 92311
cheldreth@barstowca.org
generalplan@barstowca.org

SUBJECT: CITY OF BARTSOW GENERAL PLAN AND BARSTOW INTERNATIONAL GATEWAY PROJECT (PROJECT)
DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)
SCH# 2024020501

Dear Chris Heldreth:

The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of a DEIR from the City of Barstow (City) for the Project pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.[1]

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code. S8-1

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on Projects and related activities that have the potential to adversely affect fish and wildlife resources. S8-2

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

Conserving California's Wildlife Since 1870

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CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the Project Proponents may seek related take authorization as provided by the Fish and Game Code. S8-2 cont'd

PROJECT DESCRIPTION SUMMARY

Proponents: City of Barstow and BNSF Railway

Objective: The objective of the Project is to develop a 5,000-acre logistics facility on the western side of the City of Barstow. The Project will construct a rail yard (including a block swap yard and an Intermodal Facility or IMF), a private solar energy plant, and a transload warehouse center comprising approximately nine million square feet of space. The Project also proposes to incorporate an approximately 680-acre buffer of open space around the Mojave River along the northern boundary of the Project footprint. The Project's primary function is to convert the contents of international shipping containers into domestic containers for placement back onto the rail line. The Project also includes two major planning efforts: (1) an update to the City of Barstow's General Plan to include the annexation of 2,676 acres into the City's limits and (2) the creation of a new Barstow International Gateway (BIG) Specific Plan. S8-3

Primary Project activities include the design, construction, and operation of a rail-centric supply chain hub to reduce reliance on long-haul heavy-duty trucking. The BIG IMF will facilitate the transfer of shipping containers between the rail line and the on-site transload center via zero-emission electric hostlers, reducing emissions and congestion. Offsite construction activities include public infrastructure improvements, including widening the Lenwood Channel to mitigate flooding and replacing the existing Hinkley Road bridge over the Mojave River with a longer bridge to improve its capacity for flood conditions. Approximately 6.7 miles of road improvements are anticipated to accommodate the new railway right-of-way and include Holcom Ranch, Lords, and Jiggs Roads.

Location: The Project Site is located in the Mojave Desert in the western portion of the City of Barstow, San Bernardino County, California. The Project is bounded by the Mojave River to the north, Lenwood Road to the east, Main Street to the south, and Hinkley Road to the west and is centered at approximately latitude 34.96° N and longitude -117.23° W. Approximately one-third of the Project Site lies within the City of Barstow, while the remaining two-thirds are within the City's Sphere of Influence (SOI) S8-4

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in unincorporated San Bernardino County. The Project will annex approximately 2,676 acres of undeveloped land from the City's SOI into Barstow's city limits. This expansion will increase the City's footprint beyond its current boundaries, substantially enlarging Barstow's overall size to accommodate the planned development associated with the Project. S8-4 cont'd

Timeframe: Construction of the Project is scheduled to begin in late 2026 and conclude in 2028.

COMMENTS AND RECOMMENDATIONS

CDFW appreciates the ongoing coordination with CDFW regarding obtaining a CESA Incidental Take Permit and a Lake and Streambed Alteration Agreement for the Project.

CDFW previously submitted comments on March 25, 2025 (Attachment 1), in response to the Notice of Preparation of the DEIR and recommended that the DEIR include comprehensive biological resource assessments, focused surveys for sensitive species, an analysis of impacts to wildlife connectivity, and avoidance and mitigation measures to reduce the Project's impacts to less than significant. Additionally, CDFW has collaborated with the City and its consultants to provide recommendations, including design plans for culverts, to ensure wildlife connectivity. CDFW appreciates that focused surveys were conducted for several sensitive species; however, the DEIR did not fully incorporate CDFW's recommendations and lacks: a comprehensive alternatives analysis, CDFW's prior input on wildlife connectivity and culvert design, and in some instances appropriate mitigation measures to avoid or minimize potential Project impacts. S8-5

CDFW is concerned that the DEIR has not adequately identified and disclosed the Project's impacts (i.e., direct, indirect, and cumulative) to biological resources, specifically impacts to Mojave fringe-toed lizard (*Uma scoparia*) as detailed in comment 3 below, nor has it provided sufficient supporting documentation to determine whether impacts to Mojave fringe-toed lizard will be mitigated to a level that is less than significant. It is recommended that the DEIR include an analysis of the Project's impacts to Mojave fringe-toed lizard and include specific detailed documentation that supports the analysis and determination of impacts. Without this information, with evidence to support the DEIR's determinations, the DEIR may not be able to determine whether the Project can mitigate its impacts to Mojave fringe-toed lizard to a less than significant level. **CDFW recommends the DEIR be revised and recirculated to provide this information. If the DEIR is not revised to sufficiently address these concerns, CDFW recommends the impact analysis to Mojave fringe-toed lizard be elevated to a Potentially Significant Impact.** S8-6

Additionally, the DEIR did not adequately describe and analyze a range of reasonable alternatives to the Project that are potentially feasible, would "feasibly attain most of the S8-7

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basic objectives of the Project," and would avoid or substantially lessen any of the Project's significant effects (CEQA Guidelines § 15126.6[a]). The alternatives analysis should also evaluate a "no Project" alternative (CEQA Guidelines § 15126.6[e]). **CDFW recommends the DEIR be revised and recirculated to provide this information.** S8-7 cont'd

CDFW offers the following comments and recommendations to assist the City in identifying and mitigating significant or potentially significant impacts to fish and wildlife resources for consideration in the revised and recirculated DEIR. Editorial comments or other suggestions have also been included to improve the DEIR. S8-8

COMMENT 1: Western Burrowing Owl (*Athene Cunicularia*)

Section 5.4, Pages 5.4-19, 40 to 47, 85; Appendix 5.4 BIG-1, Pages 1, 34

Issue: Western burrowing owl, their sign, and suitable burrows were observed within the Project footprint during surveys within the non-breeding seasons of 2021 and 2022 as well as in the 2024 and 2025. Thus, the Project may result in take of western burrowing owl, a candidate species under CESA. California Fish and Game Code section 86 defines "take" as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill" (Take). S8-9

Specific impact: The Project contains western burrowing owl habitat and will likely result in the permanent loss of habitat used by western burrowing owls for foraging, nesting, or breeding. Western burrowing owl is a CESA-listed species and Project activities have the potential to Take western burrowing owl. Staging construction equipment, vehicles, and foot traffic may result in the collapse of occupied burrows and result in direct mortality and/or injury to western burrowing owls. Project construction and related activities may result in collision with or crushing by vehicles or heavy equipment; entrapment within open trenches and pipes; entrapment or entanglement within materials and equipment staged and moved; crushing or burying individuals or eggs in burrows; destruction of burrows and refugia; and increased predation. The Project may result in Take of western burrowing owl if proper avoidance and minimization measures are not implemented. The Project will most likely require translocation of western burrowing owls since burrowing owls have been detected on the Project site. S8-10

CDFW appreciates that western burrowing owl surveys were conducted during the breeding and non-breeding season following CDFW's *2012 Staff Report on Burrowing Owl Mitigation*[2] (Staff Report), and that the data was provided in the S8-11

[2] California Department of Fish and Wildlife (CDFW). 2012. Staff Report on Burrowing Owl Mitigation. https://www.wildlife.ca.gov/conservation/survey-protocols.

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DEIR. CDFW also appreciates the inclusion of mitigation measure (MM) MM BIG BIO-21 (Western Burrowing Owl Pre-construction Surveys), which contemplates an Incidental Take Permit (ITP). However, MM BIG BIO-21 only considers an ITP if impacts to western burrowing owl cannot be avoided through measures such as establishing avoidance buffers during the breeding and non-breeding season. CDFW is concerned that these measures may not *fully avoid* impacts to western burrowing owl and strongly recommends that the Project Proponents apply for a CESA ITP for western burrowing owl prior to commencing Project activities. S8-11 cont'd

Why impact would occur: MM BIG BIO-21 proposes to implement avoidance buffers for western burrowing owl that are present during the non-breeding and breeding season according to the 2012 Staff Report on Burrowing Owl Mitigation. However, MM BIG BIO-21 does not identify the level of disturbance that the Project will consider when determining the appropriate size of the buffer. CDFW considers the level of disturbance for the Project as "High" due to extensive habitat disturbance and length of construction regardless of whether owls are breeding or not breeding. Further, MM BIG BIO-21 proposes translocation of burrowing owl via a Burrowing Owl Plan, and while MM BIG BIO-21 contemplates an ITP, it is not clear whether an ITP will be secured. An ITP must be secured prior to implementing burrowing owl translocation. S8-12

Absent an ITP, CDFW is concerned that the Project will not implement appropriate avoidance and minimization to ensure full avoidance of impacts to western burrowing owl, which may result in unauthorize Take of burrowing owls, their nest, or eggs, and destruction of nesting, foraging, and over-wintering habitat, impacting burrowing owl populations. Indirect impacts to burrowing owl may also occur from noise, vibration, lighting, dust, grading, earthmoving, and equipment use.

The DEIR also includes MM BIG BIO-22 (Burrowing Owl Compensatory Mitigation), which provides compensatory mitigation for temporary and permanent impacts to western burrowing owl habitat, which is reported to be at a minimum of 495 acres and proposed to be mitigated at a minimum 1:1 mitigation ratio. MM BIG BIO-22 should clarify that compensatory mitigation will occur through a CESA ITP and any impacts to western burrowing owl should be minimized and fully mitigated at a mitigation ratio determined by CDFW in the CESA ITP. S8-13

MM BIG BIO-22 also discusses compensatory mitigation for western burrowing owl may include conservation or mitigation bank credits at a CDFW-approved bank and refers to the Mojave Desert Conservation Bank, land acquisition and permanent conservation and management, or payment to an in-lieu fee program. CDFW would like to clarify that at this time, there are currently no conservation or mitigation banks approved by CDFW to sell burrowing owl credits and CDFW does not accept payment to an in-lieu fee program as mitigation pursuant to an ITP. Compensatory S8-14

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mitigation required by an ITP can be fulfilled by one or more of the following options: 1) Conservation or Mitigation Bank credits (if available) 2) Permittee-responsible mitigation land acquisition protected by a conservation easement in perpetuity.

Further, MM BIG BIO-22 proposes nesting compensatory mitigation for burrowing owl with either desert tortoise and/or Mojave fringe-toed lizard mitigation either through land acquisition or the purchase of mitigation bank credits. Please note that if conservation or mitigation bank credits are proposed, the bank must cover the species that the ITP requires compensatory mitigation for. Currently no CESA burrowing owl or Mojave fringe-toed lizard credits are available at a CDFW-approved conservation/mitigation bank and compensatory mitigation can only be fulfilled through Permittee-responsible mitigation land acquisition. S8-14 cont'd

Evidence impact would be significant: Habitat loss has resulted in either extirpation or drastic reduction of burrowing owl populations (Gervais et al. 2008). This Project will develop 5,000 acres of undeveloped desert habitat within the range of western burrowing owl. The EIR identifies at least 495 acres of occupied western burrowing owl habitat. Additionally, the DEIR's reports the potential loss of approximately 450 acres of agricultural lands and other open lands that may provide suitable foraging and nesting habitat for western burrowing owl. CDFW requests further clarification on why the remaining acreage was not considered suitable habitat for burrowing owl within the DEIR. CDFW considers the Take of burrowing owl and the loss of the species' habitat as a significant impact, unless mitigated to a level of less than significant, which would occur through a CESA ITP. S8-15

Recommended Potentially Feasible Mitigation Measure(s): CDFW recommends that the following changes to MM BIG BIO-21 and MM BIG BIO-22 be adopted in the recirculated DEIR (additions are in **bold** and edits in ~~strikethrough~~):

MM BIG BIO-21: Western Burrowing Owl Construction Requirements

No less than 14 days prior to **the** start of **any** ~~construction mobilization~~ **Project** activities within suitable habitat, a **qualified** Species-Specific biological monitor shall conduct pre-construction surveys for burrowing owl and/or occupied nest burrows within the limits of the BIG construction footprint plus a 500-foot buffer**, according to the 2012 Staff Report on Burrowing Owl Mitigation**. S8-16

Additionally, time lapses between BIG construction within suitable habitat shall trigger subsequent take avoidance surveys including but not limited to a final survey conducted within 24 hours prior to ground disturbance. The pre-construction surveys shall be repeated if there is a time lapse between construction activities of 14 days or more within previously surveyed areas. All surveys shall be conducted in accordance with the most current CDFW survey methods.

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If burrowing owl, active burrows, **or sign (e.g., molted feathers, cast pellets, prey remains, eggshell fragments, decoration, or excrement)** are not observed during the pre-construction surveys, no additional conditions shall be required to avoid direct impacts on burrowing owl within the surveyed areas.

If burrowing owl is documented during pre-construction surveys, occupied burrowing owl burrows shall not be disturbed during the nesting season (February 1 through August 31) **and all impacts to burrowing owl shall be fully avoided** ~~unless~~ **until** a **CDFW**-approved Species-Specific biological monitor verifies through non-invasive methods that either the birds have abandoned or failed nesting attempts, or that juveniles from the occupied burrows are foraging independently and capable of independent survival. A Species-Specific biological monitor shall establish exclusion buffers to protect active nests in accordance with the recommendations included in CDFW's Staff Report on Burrowing Owl Mitigation (2012 **or most recent version**) **for projects with a "High" level of disturbance**. A **qualified** Species-Specific biological monitor shall conduct ongoing monitoring during construction activities.

If burrowing owl is observed during the non-breeding season (September 1 through January 31) or confirmed to not be nesting during pre-construction surveys, a non-disturbance buffer between construction activities and the occupied burrow shall be installed by a **qualified** Species-Specific biological monitor in accordance with the recommendations included in the Staff Report on Burrowing Owl Mitigation (CDFW, 2012 **or most recent version**) **for projects with a "High" level of disturbance**.

S8-16
cont'd

The implementing entity shall submit at least one burrowing owl pre-construction survey report for each surveyed area to the satisfaction of CDFW to document compliance with BIG's western burrowing owl mitigation measures. Survey reports shall also be submitted to the City.

If **full** avoidance is not possible, either directly or indirectly, an Incidental Take Permit (ITP) under CESA shall be obtained from CDFW and a Burrowing Owl Plan shall be prepared and submitted for **review and** approval by CDFW. The plan shall also be submitted to the City. Once approved **by CDFW**, the plan**, in conjunction with the CESA ITP,** shall be implemented to relocate non-breeding burrowing owls from BIG. The plan **and CESA ITP** shall detail methods for relocation of burrowing owls and provide guidance for the monitoring and management of the replacement burrow sites and associated reporting requirements. Details of the Burrowing Owl Plan shall be determined in consultation with CDFW, and is anticipated to include, but may not be limited to, the following:

- **Proposed avoidance, and monitoring actions.**

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- **Number and location of occupied burrow sites, acres of burrowing owl habitat that will be impacted, details of site monitoring, and details on proposed buffers and other avoidance measures if avoidance is proposed.**
- Seasonal restrictions of relocation efforts – Relocation efforts shall occur during the non-breeding season (September 1 through January 31). Relocation during the breeding season (February 1 through August 31) may only occur if a qualified biologist determines that the birds have not begun egg-laying, or that the fledged juveniles are foraging independently and are capable of independent survival.
- Climatic restrictions of relocation efforts – Relocation shall not occur when temperatures exceed **8**~~9~~5 degrees Fahrenheit or during rain or high wind.
- Monitoring schedule and length – Full-time monitoring shall occur for at least two weeks following passive relocation and periodically thereafter **or as required by the CESA ITP**.

S8-16 cont'd

MM BIG BIO-22: Western Burrowing Owl Compensatory Mitigation

Prior to **the** start of ~~construction mobilization~~ **any Project** activities, the implementing entity shall **provide compensatory mitigation for burrowing owl as described in a CESA ITP and shall** prepare a Compensatory Mitigation Plan (CMP) **to be included in the CESA application** ~~in consultation with CDFW~~ that describes the compensatory mitigation that the implementing entity proposes to ~~shall be~~ provide~~d~~ at a minimum 1:1 ratio to offset permanent and temporary impacts on burrowing owl habitat. The CMP shall describe the following:

S8-17

- A description of burrowing owl and habitat types for which compensatory mitigation is being **proposed** ~~provided~~.
- A description of the methods used to identify and evaluate mitigation options. Options may include one or more of the following:
  - Purchase of mitigation credits from a~~n agency~~ **CDFW**-approved **conservation and/or** mitigation bank**, if CESA credits for burrowing owl are available** ~~(e.g., Mojave Desert Tortoise Conservation Bank or other CDFW approved mitigation bank)~~.
  - Protection of burrowing owl habitat through ~~acquisition of fee title or~~ **a** conservation easement and funding for long-term management of the habitat. Endowment funds shall be transferred to the applicable agency or entity and conservation easements shall be held by an entity approved in writing by **CDFW**~~the applicable regulatory agency~~. ~~In circumstances where the implementing entity protects habitat through a conservation easement~~, **T**~~t~~erms of the conservation easement shall be subject to approval of **CDFW**~~the applicable regulatory agencies~~, and the conservation easement shall identify ~~applicable regulatory~~

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~~agencies~~ **CDFW** as third-party beneficiary~~ies~~ with a right of access to the easement areas.

~~○ Payment to an existing in-lieu fee program.~~

- A summary of the estimated direct permanent and temporary **Project** impacts on burrowing owl and burrowing owl habitat.
- A description of the process that ~~shall~~ **is proposed to** be used to confirm **Project** impacts. Actual **Project** impacts on burrowing owl and burrowing habitat could differ from estimates. Should this occur, ~~adjustments shall be made to the proposed compensatory mitigation in consultation with~~ **the Permittee shall be responsible for providing compensatory mitigation for final Project impacts**~~CDFW~~.

S8-17 cont'd

The burrowing owl CMP **shall be updated per the requirements in the CESA ITP** and mitigation requirements shall be submitted to the City for review. If all or any portion of ~~the acquired desert tortoise and/or Mojave fringe-toed lizard compensatory mitigation for other CESA-listed species (MM BIG BIO-16 and MM BIG BIO-24, respectively) or other~~ required compensatory mitigation lands/credits meet the criteria for burrowing owl compensatory mitigation **in the CESA ITP**, it may be used to fulfill that portion of the obligation for burrowing owl compensatory mitigation requirements.

COMMENT 2: Desert Tortoise (*Gopherus agassizii*)

Section 5.4, Pages 5.4-16 to 17, 35 to 36, 70 to 79; Appendix 5.4 BIG-1, Pages 32-38

S8-18

Issue: Desert tortoise was observed on the Project site during focused surveys in 2021, 2022, 2023, and 2024. Thus, the Project may result in Take of desert tortoise, an endangered species protected under CESA. However, based on the mitigation measures provided for desert tortoise, the DEIR did not specify whether a CESA ITP will be obtained for impacts to desert tortoise.

Specific impact: Desert tortoises are being impacted by ongoing threats from habitat loss, habitat degradation, and habitat fragmentation due to development. Desert tortoise is a CESA-listed species and Project activities have the potential to Take desert tortoise. Staging construction equipment, vehicles, and foot traffic may result in the collapse of occupied burrows and result in direct mortality and/or injury to desert tortoise. Project construction and related activities may result in collision with or crushing by vehicles or heavy equipment; entrapment within open trenches and pipes; entrapment or entanglement within materials and equipment staged and moved; crushing or burying individuals or eggs in burrows; destruction of burrows and refugia; and increased predation.

S8-19

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CDFW appreciates the inclusion of mitigation measures MM BIG BIO-13 (Desert Tortoise Clearance Survey), MM BIG BIO-14 (Desert Tortoise Relocation and Translocation), MM BIG BIO-15 (Common Raven Management), and MM BIG BIO-16 (Desert Tortoise Compensatory Mitigation Plan) in the DEIR. S8-20

Why impact would occur: MM BIG BIO-13 begins by stating "Prior to construction mobilization activities, desert tortoise exclusion fencing shall be installed and maintained to avoid Take of desert tortoise…" and continues without considering that installation of desert tortoise exclusionary fencing should only occur through a CESA ITP. Installation of exclusionary desert tortoise fencing may result in indirect and direct impacts to desert tortoise, which may include Take of desert tortoise, for which authorization should be attained for; for example, through a CESA ITP from CDFW.
Further, while MM BIG BIO-13 is titled "Desert Tortoise Clearance Surveys", the measure is not clear when the area will be cleared of desert tortoise in regard to the installation of the exclusionary fencing and it is assumed that the clearance of desert tortoise will occur at some point after installation of the exclusionary fencing. Installation of exclusionary fencing could result in impacts to desert tortoise if clearance surveys are not performed at locations where exclusionary fencing will be installed and these impacts should be avoided or minimized. S8-21

MM BIG BIO-14 outlines requirements for relocation/translocation of desert tortoise and discusses obtaining a CESA ITP for the specific purpose of authorizing relocation/translocation. CDFW greatly appreciates that the DEIR considered raven management as a way to avoid and minimize impacts to desert tortoise in MM BIG-BIO-15. Ravens are one of the biggest threats to desert tortoise, particularly hatchlings. MM BIG BIO-16 considers mitigation to offset permanent and temporary impacts to desert tortoise habitat; however, the measure does state that compensatory mitigation for impacts to desert tortoise will occur through a CESA ITP. S8-22

Evidence impact would be significant: Project activities described in the DEIR could result in Take under CESA and is prohibited unless authorized by state law (Fish and Game Code, §§ 2080 & 2085) such as a CESA ITP.

Additionally, desert tortoise populations have declined significantly in recent decades largely as a result of human activities in their native habitat, including land development, off-road vehicle use, overgrazing, agricultural development, disease, military activities, predation, and the spread of invasive species (USFWS, 2011). The desert tortoise population in the western Mojave Desert has declined by 90% since the 1980s. Desert tortoise can take up to 20 years to reach sexual maturity, which limits their ability to recover even small losses in population numbers (USFWS, 2011). S8-23

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Recommended Potentially Feasible Mitigation Measure(s): CDFW recommends the following edits be incorporated into recirculated DEIR (additions in **bold** and edits in ~~strikethrough~~):

MM BIG BIO-13: Desert Tortoise Clearance Surveys

Prior to **commencement of Project** ~~construction mobilization~~ activities, desert tortoise exclusion fencing shall be installed and maintained **according to a CESA ITP and Biological Opinion** to avoid take of desert tortoise **during Project activities**, including destruction of nests or their potential habitat in the impact footprint, where individuals are known to occur, recent sign has been observed, or construction activities have the potential to result in take. A **qualified** Species-Specific biological monitor **shall first conduct a pre-construction survey for desert tortoise according to the CESA ITP at the locations where exclusionary fencing will be installed and translocate or relocate any desert tortoise present at exclusionary fence installation locations as required by the CESA ITP and only then the exclusionary fencing shall be installed and the qualified Species-Specific biological monitor** shall be present during exclusion fence installation. Desert tortoise exclusion fencing in desert tortoise habitat shall be constructed to standards outlined in Chapter 8 of the Desert Tortoise (Mojave Population) Field Manual (*Gopherus agassizii*) (USFWS, 2009b) and shall be used to delineate the area. The desert tortoise exclusion fencing shall be maintained and monitored daily during the desert tortoise activity period (i.e., early March through early June and September through early November) to allow for fencing to be maintained in good condition, and to determine if tortoises are "trapped" along the fencing searching for a way to access the other side. Outside of the desert tortoise activity period, fence inspections shall occur at least once weekly by a **qualified** Species-Specific biological monitor. If failures in the exclusion fence are documented, desert tortoise clearance surveys shall be repeated for affected areas. At the discretion of the **CESA ITP and Biological Opinion** ~~designated biologist~~, desert tortoise exclusion fencing design shall incorporate areas of shade and/or predation protection (e.g., artificial burrows) in the event a desert tortoise becomes trapped along the fence. Desert tortoise guards, or other agency approved design, shall be installed and connected to the exclusionary fencing at construction area entry points to prohibit desert tortoise from crossing into the construction right-of-way. The desert tortoise guard shall have a clear escape route away from construction activity for any desert tortoise that should fall into the guard. The guard shall be inspected daily by a **qualified** biological monitor for desert tortoise and to ensure the escape route is free of obstruction and debris.

S8-24

Immediately following the installation of desert tortoise exclusion fencing, Species Specific biological monitors **and/or designated biologists** approved by **USFWS** ~~the~~

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~~agencies~~ in accordance with the Desert Tortoise Authorized Biologist Qualifications Form (Section 3.2) of the *Desert Tortoise (Mojave Population) Field Manual (Gopherus agassizii*) (USFWS, 2009b) **and CDFW** shall conduct clearance surveys in suitable habitat for desert tortoise. The survey(s) shall be conducted in general accordance with Chapter 6 of the *Desert Tortoise (Mojave Population) Field Manual (Gopherus agassizii*) (USFWS, 2009) or current clearance survey protocol **and shall align with requirements in the CESA ITP and Biological Opinion**. ~~The survey(s) may be conducted any time of year, but preferably during the desert tortoise active period (i.e., early March through early June, and September through early November).~~ Survey results shall be provided to the City**, CDFW, and USFWS**.

If active desert tortoise burrows are identified in the impact footprint during desert tortoise clearance surveys and required to be moved off site, a desert tortoise translocation plan will be implemented as approved by USFWS and CDFW. All unoccupied desert tortoise pallets and burrows that are not practical to avoid shall be examined and excavated by hand during the clearance survey by the **qualified** Species Specific biological monitors and collapsed to prevent reentry following the procedures and precautions outlined in the *Desert Tortoise (Mojave Population) Field Manual (Gopherus agassizii)* (USFWS, 2009b)**, CESA ITP, and Biological Opinion**.

S8-24 cont'd

MM BIG BIO-14: Desert Tortoise Relocation and Translocation

Prior to start of ~~construction mobilization~~ **Project** activities, a designated biologist **approved by CDFW through a CESA ITP and USFWS through a Biological Opinion** shall prepare a BIG-specific Desert Tortoise Translocation Plan, based on the *Translocation of Mojave Desert Tortoises from Project Sites: Plan Development Guidance* (USFWS, 2020), H*ealth Assessment Procedures for the Mojave Desert Tortoise (Gopherus agassizii): A Handbook Pertinent to Translocation* (USFWS, 2016) and *Desert Tortoise (Mojave Population) Field Manual (Gopherus agassizii)* (USFWS, 2009b) or other current USFWS guidelines and in accordance with applicable Incidental Take Permits and Biological Opinions. The BIG-specific Desert Tortoise Translocation Plan shall identify suitable relocation and translocation sites, provide details on desert tortoise surveys and for moving desert tortoise out of harm's way, and include the methodology for visual desert tortoise body condition assessments. ~~A~~ **The** designated biologist shall provide the BIG-specific Desert Tortoise Translocation Plan to the USFWS and CDFW for review and approval **at least 30 days** prior to start of **Project activities before** translocation. At a minimum, the Desert Tortoise Translocation Plan shall include the following measures:

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- The **qualified** Species-Specific biological monitor **or the designated biologist** shall implement the Desert Tortoise Translocation Plan during BIG construction. Only **qualified** Species-Specific biological monitors **or**

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designated biologists authorized by the USFWS **and CDFW** to handle desert tortoise shall move the animal and project-specific ITPs for desert tortoise shall be acquired under CESA and FESA prior to such actions.

- The **approved** Species-Specific biological monitor **or designated biologist** shall move the desert tortoise found in construction work areas out of danger outside of the potential impact footprint, following the procedures and conditions outlined in the Incidental Take Permit and Biological Opinion.
- Prior to the **approved** Species-Specific biological monitor **or designated biologist** moving desert tortoise out of the construction work area, the biological monitor **or designated biologist** shall survey the relocation and translocation site to confirm that suitable burrows for desert tortoise exist. If few or no burrows are available, artificial burrows and/or shade structures shall be created along the outer perimeter of the desert tortoise exclusion fencing following the guidelines in the *Desert Tortoise (Mojave Population) Field Manual (Gopherus agassizii)* (USFWS 2009b) and *Shade Structures for Desert Tortoise Exclusion Fence: Design Guidance* (USFWS 2018), or as updated or replaced by the USFWS **and in accordance with the CESA ITP and Biological Opinion**.
- If needed, artificial burrows shall be installed outside of the construction work area (along the outer perimeter of the desert tortoise exclusion fencing if applicable) from where the individual was relocated to provide cover and prevent exposure to predators and dehydration. Prior to excavation of an occupied burrow, artificial burrows shall be installed.

S8-25 cont'd

MM BIG BIO-16: Desert Tortoise Compensatory Mitigation Plan

Prior to start of ~~construction mobilization~~**Project** activities, the implementing entity shall prepare a Compensatory Mitigation Plan (CMP) ~~in consultation with~~ **proposed to** CDFW **in the CESA ITP application** that describes the compensatory mitigation that shall be provided at a minimum 1:1 ratio to offset permanent and temporary impacts on desert tortoise habitat. The **CMP** shall describe the following:

- A description of desert tortoise and habitat types for which compensatory mitigation is being **proposed** ~~provided~~.
- A description of the methods used to identify and evaluate mitigation options. Options may include one or more of the following:
  - Purchase of mitigation credits from an agency-approved mitigation bank (e.g., Mojave Desert Tortoise Conservation Bank or other CDFW/USFWS approved mitigation bank).
  - Incidental take permit coverage through an existing agency general conservation plan (e.g., USFWS Desert Tortoise General Conservation Plan).
  - Protection of desert tortoise habitat through acquisition **and** ~~of fee title or~~ **a** conservation easement and funding for long-term management of the

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habitat. Endowment funds shall be transferred to the applicable agency or entity **approved by CDFW and USFWS** and **the** conservation easements shall be held by an entity approved in writing by the applicable regulatory agency**; for example, CDFW and USFWS**. In circumstances where BNSF protects habitat through a conservation easement, the terms of the conservation easement shall be subject to approval of the applicable regulatory agencies, **such as CDFW and USFWS** and the conservation easement shall identify applicable regulatory agencies as third-party beneficiaries with a right of access to the easement areas.

- ~~Payment to an existing in-lieu fee program~~.

- A summary of the estimated direct permanent and temporary impacts on desert tortoise and desert tortoise habitat.
- A description of the process that **is proposed to** be used to confirm impacts. Actual impacts on desert tortoise and desert tortoise habitat could differ from estimates. Should this occur, compensatory mitigation **shall occur as determined by** ~~in consultation with~~ CDFW~~/~~ and USFWS. **CDFW shall describe in the CESA ITP the process for satisfying compensatory mitigation.**
- ~~Adjustments to impact estimates and compensatory mitigation shall occur in the following circumstances:~~
  - ~~Impacts on desert tortoise (typically measured as habitat loss) are reduced or increased as a result of changes in BIG design;~~
  - ~~Pre-construction site assessments indicate that desert tortoise habitat features are absent (e.g., because of errors in land cover mapping or land cover conversion);~~
  - ~~The desert tortoise habitat is determined to be unoccupied based on negative species surveys; or~~
  - ~~Impacts initially categorized as permanent qualify as temporary impacts.~~
  - ~~An overview of the strategy for mitigating effects on desert tortoise. The overview shall include the ratios to be applied to determine mitigation levels and the resulting mitigation totals.~~
  - ~~A description of habitat restoration or enhancement Projects, if any, that would contribute to compensatory mitigation commitments.~~
  - ~~A description of the success criteria that shall be used to evaluate the performance of habitat restoration or enhancement Projects, and a description of the types of monitoring that shall be used to verify that such criteria have been met.~~
  - ~~A description of the management actions that shall be used to maintain the habitat on the mitigation sites, and the funding mechanisms for long-term management, if applicable.~~
  - ~~A description of adaptive management approaches, if applicable, that shall be used in the management of species habitat.~~
  - ~~A description of financial assurances that shall be provided to demonstrate that the funding to implement mitigation is assured.~~

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Final compensatory mitigation **in a CESA ITP** shall be determined **by**~~in consultation with~~ CDFW. The CMP shall be submitted to the City. S8-26 cont'd

COMMENT 3: Mojave Fringe-Toed Lizard (*Uma scoparia*)

Section 5.4, Pages 5.4-16 to 17, 70 to 79, 89 to 90; Appendix 5.4 BIG-1, Pages 32-38

Issue: The Project will impact rare dune habitat, which includes the Mojave-Sonoran Desert dunes which are classified as S3 according to the California Sensitive Natural Communities. Natural Communities with ranks of S1-S3 are considered Sensitive Natural Communities to be addressed in the environmental review processes of CEQA and its equivalents. For alliances with State ranks of S1-S3, all associations within them are also considered Sensitive, which includes Mojave fringe-toed lizard, a Species of Special Concern (SSC), that depends on dunes in the Mojave Desert. S8-27

MM BIG BIO-24 (Mojave Fringe-toed Lizard Compensatory Mitigation) identifies impacts to 1,009.1 acres of occupied Mojave fringe-toed habitat. Due to the large impacts described in the DEIR and the lack of information to support the DEIR's significance determination, CDFW believes impacts to Mojave fringe-toed lizard will not be mitigated to less than significant even with the DEIR's proposed mitigation strategy.

Specific Impacts: The Project will permanently remove unique and sensitive sand dune habitat in the Mojave Desert and in doing so, will impact the ability of the remaining sand dune system to function naturally. MM BIG BIO-24 identifies impacts to 1,009.1 acres of occupied Mojave fringe-toed lizard habitat within the Lenwood dune complex, a system of aeolian sand dunes located in the Barstow reach of the Mojave River within the Project footprint and the SOI. Removing approximately 1,000 acres of this habitat/system is likely to disrupt the sand transport system, which replenishes the fine sand deposits for the entire reach of the Mojave River.[3] Muhs and Holliday (1995) demonstrated that the Mojave River dune system is dependent on wind-driven transport of Mojave River-derived sand, and any disruption to sediment supply or airflow would degrade these habitats. Barrows and Allen (2009) demonstrated that the Mojave fringe-toed lizard relies on the dunes of the Mojave River and its reaches, interference with natural sand movement could cause significant impacts to this sensitive species. The DEIR specifies that the S8-28

[3] BIG Project Draft Environmental Impact Report. (2024). *Biological Resources – Missing Linkages* (Section 5.4, p. 5.4-58). BNSF Railway and City of Barstow.

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Project footprint "…partially overlaps with the Mojave River – Barstow/Camp Cody Linkage," a critical linkage spanning 79-miles and important for sand transport to the Kelso Dunes. The DEIR did not sufficiently analyze this impact on the dune habitat. With disruption to the sand transport system and its corresponding effect on dune habitat, the Project will likely drastically impact the subpopulation of Mojave fringe-toed lizard endemic to this reach of the Mojave River, which is genetically distinct from other populations of the species. Mojave fringe-toed lizard was observed throughout dune habitat within the transload warehouse center portion of the Project Site during focused surveys in 2023. The highest concentration of Mojave fringe-toed lizard was observed in the central and northeastern portions for the Project Site. Previous genetic studies from Murphy et al. (2006) have revealed that the population of Mojave fringe-toed lizard within the Mojave River is a separate clade, providing evidence of the uniqueness of the species at this location. This population is on the western edge of the range of this species. Typically, peripheral populations have the potential to maintain substantial genetic variation allowing the population to adapt to environmental conditions at the edge of the species' range thus increasing the importance of this sub-population.

S8-28 cont'd

Appendix 5.4 BIG-1 (Appendix) recognizes that the sub-population "could be of added ecological value if its members have unique genetic variation that may be beneficial to the species in allowing for adaptations to changing environmental conditions." The Appendix also acknowledges that "[a] decrease in transfer of genetic variation will likely negatively affect the long-term viability of the species." However, the Appendix goes on to state that over 500 acres of suitable dune habitat will be avoided during construction, this unimpacted dune area will continue to support the species, and is connected to suitable habitat to the north, northeast, and southwest. Accordingly, the Appendix determined that indirect impacts to the species are less than significant. CDFW disagrees with this determination for several reasons. First, the DEIR provides no evidence as to how removing approximately two-thirds of the dune habitat for the subpopulation would not be a significant effect. As mentioned above, removing the habitat will impact the sand transport system and as a result it is unclear if or how the dunes will persist into the future. Moreover, there is no evidence that the remaining 500 acres will continue to provide habitat for Mojave fringe-toed lizard in the same way it does today. More importantly, in CDFW's experience, removing two-thirds of unique, sensitive habitat is likely to result in a significant impact to the habitat and the species it supports. Second, development adjacent to the remaining dune habitat is likely to have additional spillover effects (e.g. noise, vibration, light, etc.) impacting the value of the remaining habitat, but the DEIR did not discuss these effects or consider them when relying on the remaining habitat to make its significance determination. Third, figure 5.1-7 from Appendix 5.4 BIG-1, shows the highest density of Mojave fringe-toed lizards to be within the impact footprint, not in the 500 acres that would be preserved. As a result, it's unclear how preserving the remaining 500 acres would help mitigate impacts to

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S8-30

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the species such that impacts would be less than significant. **A revised impact analysis should address the issues identified above, explain how the remaining approximately 500 acres of dune habitat will help mitigate impacts to the species considering the impacts to the genetic diversity of this species, the specific population being impacted, and the impacts to sand transport and provide additional minimization and mitigation measures to reduce impacts to a less than significant level.** S8-30 cont'd

Why Impacts Would Occur: Mojave fringe-toed lizard is a SSC due to its declining population levels, limited ranges, and/or continuing threats, which have made the species vulnerable to extinction. The Mojave fringe-toed lizard is a habitat specialist, relying on the creosote bush scrubland and desert grasses directly adjacent to fine, windblown sand dunes for burrowing, thermoregulation, foraging, and reproduction (Dr. William Persch, personal communication, December 24, 2025). Project activities that disturb or compact sand, alter wind flow, or introduce invasive vegetation can significantly degrade these habitats. Removing approximately 1,000 acres of dune habitat for the species will negatively affect the sub-population. Cumulative impacts, including this Project, may result in local extirpation of this isolated genetic sub-population within the Mojave Desert (Dr. William Persch, personal communication, December 24, 2025). Appendix 5.4 BIG-1 recognizes that "a decrease in genetic variation will likely negatively affect the long-term viability of [Mojave fringe-toed lizard]." S8-31

MM BIG BIO-24 considers nesting mitigation for Mojave fringe-toed lizard with burrowing owl and desert tortoise mitigation. However, as CDFW pointed out previously, nesting of mitigation for Mojave fringe-toed lizard should not occur because the habitat occupied by Mojave fringe-toed lizard is different from desert tortoise and burrowing owl habitat. Mojave fringe-toed lizard requires dry and loose, sandy soils with vegetation, and their burrowing, breeding, thermoregulation, and foraging behavior are affected by the specific grain size of wind-blown sands directly connected to the unvegetated dunes and riparian habitats. Mojave fringe-toed lizard occupies a distinct ecological niche in the Mojave Desert. Burrowing owl requires open, flat terrain with pre-existing burrows and low vegetation while desert tortoise requires firm soils for burrows and thermoregulation as well as herbaceous plants and annual wildflowers for foraging. S8-32

Evidence Impacts Would Be Significant: Mojave fringe-toed lizard has experienced population declines due to habitat fragmentation, habitat loss, and habitat degradation. Mojave fringe-toed lizard is an extreme habitat specialist that is restricted to fine sand environments found in dune environments that have a patchy and limited distribution on the landscape (Hollingsworth et al. 1999). The Mojave fringe-toed lizard's narrow habitat requirements make it extremely vulnerable to habitat destruction (USFWS, 2011). The species is highly sensitive to changes in S8-33

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sand movement and vegetation cover. Additionally, as mentioned above, the population of Mojave fringe-toed lizard within the Mojave River is a separate clade, providing evidence of the uniqueness of the species at this location. Given this species' limited range, specialized habitat requirements, and genetic uniqueness, the Project's removal of approximately two-thirds of active sand dune systems within the subpopulation's known distribution range may not be able to be mitigated, especially without any analysis of the Project's impacts on sand transport system. Moreover, the DEIR lacks any information indicating that, as discussed more fully below, preserving 1,009.1 acres of occupied dune habitat would help reduce impacts to this separate clade to below a level of significance. Furthermore, the DEIR's mention of placing conservation easements on either side of the Mojave River to help mitigate indirect impacts lacks any explanation as to how such mitigation would actually mitigate the impacts (i.e. no evidence of where CEs would be placed, type of habitat within the CEs, etc.). **CDFW requests that the recirculated DEIR provides evidence to support the DEIR's determination that the Project can mitigate impacts to a less than significant level, including consideration of alternatives.**

S8-33 cont'd

S8-34

Recommended Potentially Feasible Mitigation Measure(s): CDFW appreciates that the DEIR includes compensatory mitigation for Mojave fringe-toed lizard in MM BIG BIO-24. MM BIG BIO-24 proposes mitigation at a 1:1 for the loss of at least 1,009.1 acres of habitat to Mojave fringe-toes lizard and states, "With implementation of mitigation, BIG's potentially significant construction impacts to the Mojave fringe-toed lizard would be less than significant". However, without detailed impact analysis for the reported 1,009 acres of impact to dune habitat, its sand transport system, and the Mojave fringe-toed lizard, there is no evidence as to how such impacts would be successfully mitigated, let alone to below a level of significance.

S8-35

Further, the ratio of permanent conservation to loss must, in most cases, exceed 1:1 for any species (i.e., 3:1), particularly for Mojave fringe-toed lizard, who occupies an irreplaceable and rare habitat. As proposed, CDFW believes MM BIG BIO-24 will not reduce impacts to Mojave fringe-toed lizard to less than significant, and CDFW recommends that the recirculated DEIR evaluates alternatives to minimize impacts to Mojave fringe-toed lizard and specifies mitigation that is roughly proportional to the level of impacts, in accordance with the provisions of CEQA (CEQA Guidelines, §§ 15126.4(a)(4)(B), 15064, 15065, and 16355. For example, the DEIR should consider an alternative where no development occurs within the Mojave River, or its floodplain, to help mitigate project impacts on Mojave fringe-toed lizard. By avoiding the Mojave River, not only would the Project avoid risks associated with building within the river, but also avoid and minimize significant impacts to fish and wildlife resources. It is anticipated that at least 3,000 acres of Mojave fringe-toed lizard habitat within the Mojave River watershed will be needed, conserved and managed in perpetuity to mitigate impacts to the species to below a level of significance. Due

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to limited sand dune habitat in the Mojave River, CDFW should be consulted on this to best determine how impacts to Mojave fringe-toed lizard can be mitigated to below a level of significance.

S8-36 cont'd

In consideration of the above, at this time, CDFW only offers minor edits (in **bold** and ~~strikethrough~~) to MM BIG BIO-24 until a recirculated DEIR is provided.

MM BIG BIO-24: Mojave Fringe-toed Lizard and Compensatory Mitigation

Prior to **Project** ~~construction mobilization~~ activities, the implementing entity shall prepare a compensatory mitigation plan for direct impacts on Mojave fringe-toed lizard and 1,009.1 acres of occupied dune habitat (active desert dunes, stabilized and partially stabilized dunes, disturbed stabilized and partially stabilized dunes). Dune habitat shall be mitigated ~~in-kind~~ through the acquisition and preservation of dune habitat suitable for Mojave fringe-toed lizard at a minimum **3**~~1~~:1 ratio to offset permanent and temporary impacts on Mojave fringe-toed lizard habitat. Land selected for compensatory mitigation must be:

- Deposits of aeolian or fine windblown sands associated with dunes, washes, hillsides, margins of dry lakes, and/or sandy hummocks within the Mojave Desert;
- Occupied with Mojave fringe-toed lizard or with potential for connectivity to lands occupied by Mojave fringe-toed lizard;
- **Within the Mojave River Watershed;**
- Near land currently under or planned for protection; and
- Not characterized as highly disturbed.

S8-37

A long-term management plan and endowment for land acquisition, preservation, and management in perpetuity shall be established by a qualified land manager/ conservancy. ~~All or any portion of the compensatory mitigation lands/credits acquired for impacts on other sensitive resources (i.e., aquatic resources or sensitive vegetation communities) may also be used to fulfill compensatory mitigation requirements for Mojave fringe-toed lizard. For example, compensatory mitigation pursuant to MM BIG BIO-16 and MM BIG BIO-22 may also be used to fulfill compensatory mitigation requirements for Mojave fringe-toed lizard if acquired mitigation lands/credits meet the criteria above.~~ Final compensatory mitigation for Mojave fringe-toed lizard shall be determined in coordination with CDFW.

COMMENT 4: Arroyo Toad (*Anaxyrus californicus*)

Section 5.4, Pages 5.4-16 to 17, 70 to 79; Appendix 5.4 BIG-1, Pages 32-38

S8-38

Docusign Envelope ID: A5E10FCE-02CE-4B8D-89B2-523013A0A4C1

Issue: The footprint of the proposed Project occurs in the vicinity of the furthest northeast known occurrence of arroyo toad**.** Arroyo toads are listed under the Federal Endangered Species Act as Threatened and are SSC**.** On March 25, 2024, CDFW commented on the Notice of Preparation for the Project and recommended that an analysis of known arroyo toad occurrences and a thorough review of scientific literature on the arroyo toad season migration patterns be conducted to determine the nature of impacts to the species and potential mitigation measures to offset both Project construction impacts to potentially resident and migratory arroyo toads. However, in regards to Arroyo toad, the DEIR simply stated, "Arroyo toad is not anticipated to occur within the BIG footprint and is not further discussed in this section" and according to the DEIR: "per coordination with USFWS, this species is not expected to occur in the area". However, the lead agency has the responsibility to analyze and disclose any potential impacts and arroyo toad has historically occurred in the Project footprint as depicted in Figure 1. Although no recent records exist for arroyo toad, the absence of data does not preclude presence and **CDFW requests that pre-construction surveys for arroyo toad be conducted per MM BIG BIO-38 below to determine presence/absence of arroyo toad.** S8-38 cont'd

Specific Impacts: The Project may result in loss of habitat and impacts from Project lighting, dust, noise, and water quality to both potentially resident and migratory arroyo toads.

Why Impacts Would Occur: Arroyo toad depends on ephemeral streams and associated shallow, sandy or gravelly pools and sandy terraces for breeding and foraging. Construction activities, ground disturbance, alteration of hydrology, and increased human and vehicular presence can degrade or eliminate these critical habitats. Additionally, changes in water flow, sedimentation, and vegetation cover can disrupt breeding cycles and larval development. S8-39

Evidence Impacts Would Be Significant: The Arroyo toad has experienced significant population declines due to habitat loss, water diversion, and invasive species, and the predicted habitat and range of this species is within 10 miles of the Project Site (CNDDB, [ds129 and 2001]. The Barstow region includes intermittent streams and washes that may provide suitable habitat or serve as dispersal corridors. Absent an impact analysis and avoidance, minimization, and mitigation measures, the DEIR has not demonstrated that potential impacts to Arroyo toad will be less than significant.

Recommended Potentially Feasible Mitigation Measure: CDFW recommends the following new mitigation measure (MM BIG BIO-38), in addition to an impact analysis, be incorporated into the recirculated EIR. S8-40

MM BIG BIO-38: Arroyo Toad Pre-Construction Surveys (NEW)

Docusign Envelope ID: A5E10FCE-02CE-4B8D-89B2-523013A0A4C1

A qualified biologist(s) shall survey the Project site prior to commencement of Project activities according to the USFWS's Survey Protocol for the Arroyo Toad (available at: https://www.wrc-rca.org/species/survey_protocols/1999_ArroyoToad_protocol.pdf). If arroyo toads are found in the Project area and impacts are unavoidable, the Project Proponents shall not initiate Project activities at arroyo toad occupied locations and contact CDFW and the USFWS immediately within 24 hours to coordinate on appropriate avoidance and minimization measures to avoid impacts to arroyo toad. Unavoidable impacts to arroyo toad compensatory mitigation at a 3:1 mitigation ratio. Compensatory mitigation shall include permanent conservation of acquired lands through a conservation easement and an endowment to ensure management of the lands in perpetuity.

S8-40 cont'd

COMMENT 5: Crotch's Bumble Bee (*Bombus crotchii*)

Section 5.4, Pages 5.4-16 to 17, 36, 70 to 79; Appendix 5.4 BIG-1, Pages 32-38

Issue: The DEIR did not conduct a proper impact analysis for Crotch's bumble bee. Crotch's bumble bee is a candidate species protected under CESA, and the Project Site is within the eastern edge of the current known range. However, the DEIR simply determined that there is no potential for Crotch's bumble bee to occur on the basis that "the arid climate and lack of preferred nectar sources preclude BIG from supporting the species year-round, is not suitable to support the species year round". Focused surveys needed to be conducted to determine whether Crotch's bumble bee is absent from the Project Site.

S8-41

Specific Impacts: The DEIR does not include any mitigation measures for Crotch's bumble bee, it is assumed to be absent from the Project site. If Crotch's bumble bee is not confirmed to be absent prior to construction; for example, through habitat assessments and surveys, Crotch's bumble bee may be present, and the Project may result in Take of Crotch's bumble bee through the destruction of nests, loss of foraging and breeding habitat, and fragmentation of suitable habitat. These impacts may occur from activities such as grading, vegetation removal, and soil compaction, particularly in areas with native flowering plants and undisturbed soils.

S8-42

Why Impacts Would Occur: Crotch's bumble bee is a ground-nesting pollinator, historically found in open grasslands, coastal scrub, and desert habitats across Southern California. The presence of native vegetation and suitable soil conditions within the Project Site suggests potential for breeding, foraging, and nesting habitat to occur. Without proper avoidance, minimization, and mitigation, Project activities could result in direct and indirect Take of this CESA protected species.

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Evidence Impacts Would Be Significant: As a CESA Candidate Species, Crotch's bumble bee is afforded legal protection under California Fish and Game Code section 2080, which prohibits the unauthorized Take of candidate species. Further, Crotch's bumble bee has a State ranking of S1/S2, which means Crotch's bumble bee is considered critically imperiled and extremely rare (often 5 or fewer populations). Additionally, Crotch's bumble bee is listed as an invertebrate of conservation priority under the California Terrestrial and Vernal Pool Invertebrates of Conservation Priority. S8-43

Recommended Potentially Feasible Mitigation Measure(s):
CDFW recommends the following new mitigation measure MM BIG BIO-39 be incorporated into the recirculated EIR to avoid, minimize, and mitigate impacts for Crotch's bumble bee:

MM BIG BIO-39: Crotch's Bumble Bee Avoidance (NEW)

A habitat assessment and in accordance with the *2023 CDFW Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species* (CDFW & Xerces Society, 2023) shall be conducted prior to commencement of Project activities to identify suitable habitat for Crotch's bumble bee. Within suitable habitat for Crotch's bumble, surveys should be conducted during the appropriate season when adult bees are active and floral resources are available in accordance with the *2023 CDFW Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species* (CDFW & Xerces Society, 2023). If Crotch's bumble bee is detected during surveys or construction activities and complete avoidance is not feasible, CDFW strongly recommends that the Project Proponents obtain a CESA ITP from CDFW prior to commencing any vegetation or ground-disturbing activities. Any unauthorized Take of Crotch's bumble bee would constitute a violation of Fish and Game Code §2080. S8-44

ADDITIONAL COMMENTS AND RECOMMENDATIONS

COMMENT 6: Alternatives Analysis

Section 8.2.4 Bio Resources Alternatives, Page 8-6

CDFW appreciates the opportunity to review the DEIR, however, the DEIR does not provide an adequate alternatives analysis as required under CEQA Guidelines §15126.6 and established case law. The California Supreme Court in *Laurel Heights Improvement Assn. v. Regents of Univ. of California* (1988) and *Citizens of Goleta Valley v. Board of Supervisors* (1990) affirmed that an EIR must present a reasonable range of alternatives that could feasibly attain most of the basic objectives of the project S8-45

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while avoiding or substantially lessening significant environmental effects. The Alternative Analysis section of the DEIR, Section 8.2.4, does not appear to meet this standard.

The DEIR identifies numerous sensitive biological resources within the Project footprint, including active desert dunes, riparian habitat, and mapped wildlife corridors associated with the Mojave River watershed. These areas support special-status species such as desert tortoise, arroyo toad, Mojave fringe-toed lizard, willow flycatcher, western yellow-billed cuckoo, Swainson's hawk, and western burrowing owl. The DEIR acknowledges that Project implementation would result in direct, indirect, and cumulative impacts, including permanent habitat loss, fragmentation of wildlife movement corridors, and increased light, noise, dust, and human activity. S8-45 cont'd

Given the scale of the Project—approximately 5,000 acres—and its location within a biologically sensitive landscape, CDFW is concerned that the DEIR does not adequately explore alternatives that could reduce or avoid these impacts to a level less than significant. For example, the DEIR does not analyze all options such as further reducing the Project footprint (only the footprint of the solar power plant was reduced), clustering development to maintain larger contiguous habitat blocks, or limiting development within the Mojave River and adjacent dunes. Avoiding development within the Mojave River and adjacent dune habitats would preserve critical connectivity, protect groundwater and watershed integrity, and maintain ecological functions that are essential for regional biodiversity. S8-46

The Reduced-Intensity Alternative provided acknowledges that development under this alternative would still substantially interfere with wildlife movement through established corridors, yet it concludes that impacts would be reduced to less than significant through the incorporation of "similar mitigation", including wildlife crossings, but the DEIR provides no supporting evidence for this conclusion. For example, it does not identify the location, number, dimensions, or design standards of the proposed wildlife crossings, nor does it include biological data, movement modeling, or site-specific analysis demonstrating that such features would function effectively for target species.

CDFW concludes that the DEIR does not meet CEQA's informational requirements and does not provide a defensible basis for Project approval. CDFW strongly recommends that a recirculated DEIR includes a more robust and complete alternatives analysis that would reduce impacts to less than significant. Given CEQA Guidelines §15088.5 and cases such as *Vineyard Area Citizens v. City of Rancho Cordova* (2007), **CDFW is requesting recirculation to ensure the public has a meaningful opportunity to review and comment.** S8-47

COMMENT 7: Groundwater Pumping and Impacts to Fish and Wildlife Resources S8-48

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Groundwater, Hydrology, and Watershed Concerns

The Project Site and Sphere of Influence (SOI) are located in the Mojave Basin Area, where water rights were adjudicated under the *Judgment After Trial* dated January 10, 1996, to address historic groundwater overdraft. The Project Site lies within the Centro Subarea. The DEIR proposes eight new temporary groundwater wells that will supply at least 311 acre-feet per year of potable groundwater for at least 2 years. Additional non-potable water will be required for Project construction activities, and it is unclear what the source of this non-potable water will be; however, it is likely to come from the Golden State Water Company (GSWC) wells. Moreover, the DEIR does not provide a specific timeline for decommissioning the wells, simply stating they will be removed "once construction water demands have been met", which could extend well beyond the Project timeline and into Project operations. The DEIR fails to assess potential impacts on regional hydrology or sensitive biological resources from the draw of groundwater. CDFW is concerned that the DEIR does not sufficiently address the importance of maintaining local groundwater levels to protect the Mojave River and its associated ecosystems and recommends maintaining one or more monitoring wells in the area to measure local groundwater levels if none exist. The specific placement of wells relative to mapped faults and the Mojave River channel—along with the timing, rates, and duration of withdrawals—should be evaluated. CDFW notes that the Mojave Water Agency is currently preparing a numerical groundwater model that could inform this analysis and recommends coordinating with the Mojave Water Agency. S8-48 cont'd

Groundwater in the Mojave Basin sustains the baseflow of the Mojave River, which is critical for maintaining riparian habitats. When groundwater is withdrawn, it reduces baseline flow and disrupts hydrologic connectivity. This reduction indirectly influences sediment availability and wind-driven transport processes that form and maintain adjacent dune ecosystems. Dune habitats adjacent to the river are part of the river's floodplain and hydrologically connected features and are considered associated habitats and resources under Fish and Game Code section 1602. Alterations to local groundwater levels and flow gradients may disrupt surface-water hydrology, degrade water quality, increase erosion, and threaten habitat integrity for sensitive species such as the southwestern willow flycatcher, Mojave fringe-toed lizard, and western yellow-billed cuckoo. S8-49

The DEIR acknowledges that the construction phase will be the period of highest groundwater demand and also anticipates long-term increases in water use associated with new residential and commercial development, roadway expansion, and population growth within the SOI. However, the DEIR does not provide a comprehensive cumulative analysis of increased demand on groundwater-dependent ecosystems or stream flows, nor does it sufficiently address hydromodification-the alteration of natural flow through the landscape (e.g., channel lining, flow diversions, culvert installations, armoring). Disturbance and compaction of soils, vegetation removal, increased impervious surfaces, and altered drainage patterns limit absorption, infiltration, and S8-50

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evapotranspiration, thereby increasing the volume and frequency of runoff and sediment transport. Hydromodification leads to stream channel instability, degraded water quality, altered groundwater recharge processes, aquatic habitat impacts, and can disconnect the river channel from its floodplain—which naturally recharges groundwater, attenuates flood flows, provides habitat, filters pollutants, and stores and releases sediment essential to watershed health. S8-50 cont'd

Further compounding these concerns is the proximity of the Project Site and the SOI to hexavalent chromium-contaminated groundwater plumes in Hinkley. While the DEIR asserts no direct hydraulic connection between the Project Site and the contamination plume, hydrologic shifts induced by new well operations raise concerns about cross-contamination and downstream impacts, particularly to the Lenwood Spreading Grounds groundwater recharge basin and other Fish and Game Code section1602 resources. **A recirculated DEIR should include source-water quality information for all aquifers used to drill new wells and for water proposed for construction activities.** S8-51

The proposed 140-acre, 21-MW solar farm and Battery Energy Storage System (BESS) at Main Street and Country Club Drive will require ongoing water use for maintenance (e.g., panel washing). The DEIR does not sufficiently evaluate the long-term groundwater demand or the potential for contamination risks associated with hexavalent chromium plumes, nor does it address implications for nearby water-dependent habitats or hydromodification from site development (e.g., expanded impervious cover, grading, drainage infrastructure). S8-52

Recommendations for Groundwater, Watershed Management, and LID

CDFW recommends the final EIR include a standalone groundwater flow model and analysis report, consistent with USGS Scientific Investigations Report 2004-5038 (Riley et al.), including: S8-53

- Hydrological modeling approach
- Sensitivity analysis
- Model calibration
- Initial condition representation
- Uncertainty analysis

Additionally, CDFW strongly supports the Lahontan Regional Water Quality Board's recommendations to integrate watershed management, Low Impact Development (LID), and hydromodification reduction into Project design but in a recirculated DEIR analysis. To maintain a landscape functionally equivalent to predevelopment hydrologic conditions and minimize non-point source pollutants, the recirculated DEIR should: S8-54

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- Maintain natural drainage paths and landscape features to slow and filter runoff and maximize groundwater recharge;
- Reduce compacted and impervious surfaces from development and road networks; and
- Manage runoff at the source using onsite infiltration and vegetated stormwater management areas.

S8-54 cont'd

LID practices that protect aquatic values also reduce infrastructure requirements and maintenance costs, and benefit air quality, open space, and habitat. Integrating LID into the Project will help mitigate hydromodification, stabilize channels, maintain floodplain connectivity, and protect groundwater recharge.

S8-55

Recommended Additions to the Draft EIR Prior to Recirculation

CDFW recommends the draft EIR be revised to include, at minimum, the following recommendations and be recirculated for additional review:

1. Groundwater–Surface Water Interaction Analysis: Quantify effects of proposed pumping on Mojave River baseflow, riparian habitats, and dune ecosystems; assess spatial placement of wells relative to faults, river channel, and floodplain.
2. Cumulative Demand Assessment: Evaluate construction and long-term water use (including solar/BESS O&M) on groundwater-dependent ecosystems and stream flows.
3. Hydromodification Assessment: Quantify expected changes in runoff volume/frequency, sediment transport, channel stability, floodplain connectivity, and groundwater recharge under proposed grading, drainage, and infrastructure; identify avoidance and minimization measures (LID).
4. Water Quality and Public Health Protections: Provide source-water quality characterization for all aquifers and construction water; assess risks of hexavalent chromium plume migration under altered gradients; evaluate implications for Lenwood Spreading Grounds and other Fish and Game Code section1602 resources.
5. Design-Level LID Commitments: Include site-specific LID BMPs (e.g., infiltration galleries, bioswales, permeable pavements, soil amendments), performance targets (infiltration/retention volumes), and maintenance plans.
6. Coordination and Compliance: Early consultation with CDFW to determine whether a Lake and Streambed Alteration (LSA) Agreement is required (See Comment 16); coordinate with Lahontan RWQCB to ensure watershed management objectives and LID practices are integrated; incorporate Mojave Water Agency modeling as available.

S8-56

COMMENT 8: Wildlife Connectivity and Crossings

S8-57

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The Project is situated in a biologically rich and ecologically sensitive region of the Mojave Desert and Mojave River Watershed, which support a diversity of native and special-status species which depend on intact habitat corridors for seasonal movement, dispersal, and access to critical resources such as water and breeding grounds.

Despite the ecological significance of this landscape, the DEIR does not entirely assess the Project's potentially significant impacts on wildlife connectivity. The analysis lacks sufficient detail on how the proposed infrastructure (roads, rail lines, and facility security fencing) will fragment habitat and disrupt wildlife movement patterns. While Appendix 5.4 (BIG-1) includes wildlife movement studies, it does not adequately address the direct, indirect, and cumulative impacts on wildlife connectivity, nor does it provide appropriate mitigation to compensate for those impacts. S8-57 cont'd

The proposed mitigation measure, mitigation measure MM BIG BIO-32, outlines the construction of a single 84-inch diameter wildlife culvert at Milepost 12.5, accompanied by four smaller water conveyance culverts. While this is a step toward addressing connectivity, the design is not appropriate. For example, the current culvert design is insufficient to prevent water from filling the structure during storm events, which does not allow for the installation of cover and structure (for boulders, logs, and brush) that are needed to facilitate the use of the crossing for many species present in the Project area. This is particularly concerning for species like the desert kit fox (*Vulpes macrotis*), American Badger (*Taxidea taxus*), and other small mammals and reptiles like Mojave fringe-toed lizard (*Uma scoparia*), which rely on structural cover, substrate, and vegetative debris within crossings for shelter and safe passage. CDFW recommends increasing the wildlife culvert size to dimensions that exceed the hydraulic needs of the culvert to allow for all weather crossings and the installation structural cover elements. Additionally, the structure should be moved to location where it is not co-located with a hydraulic structure. S8-58

Moreover, implementation of MM BIG BIO-32 is geographically limited to the southern portion of the Project footprint and the SOI. Thus, the installation of a single wildlife culvert at this location and no others fails to address connectivity impacts across the broader Project Site, leaving significant gaps in mitigation and undermining the integrity of regional wildlife corridors. S8-59

Scientific literature underscores the importance of maintaining landscape connectivity in desert ecosystems. Fragmentation from roads and fencing has been shown to isolate populations, reduce genetic diversity, and increase mortality rates (Boarman & Sazaki, 2006; Beier et al., 2008).

To meet CEQA's mandate of reducing impacts to a level that is less than significant, the final EIR must go beyond the current mitigation framework. Specifically, it should: S8-60

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- Conduct a comprehensive 12-month wildlife movement study to capture seasonal patterns and inform crossing design allowing crossing structures to be placed in locations informed by locations where wildlife are currently moving through the Project Site;
- Evaluate the hydraulic performance of all proposed culverts and underpasses to ensure they remain functional during storm events;
- Design wildlife crossings with appropriate substrate, structural complexity, and microhabitat features to support a range of species;
- Implement directional fencing and median barriers to guide wildlife and prevent access to hazardous infrastructure;
- Fully assess direct, indirect, and cumulative impacts to wildlife connectivity, including effects on desert tortoise, Mojave fringe-toed lizard, bobcat, coyote, American badger and desert kit fox.

S8-60 cont'd

CDFW recommends the City revise the EIR to provide sufficient evidence that MM BIG BIO-32 will effectively mitigate the loss of connectivity caused by the Project as currently proposed. Without a more robust and regionally comprehensive approach, the Project risks permanently disrupting critical wildlife corridors and the continued movement of wildlife across the Project Site allowing a reduction of the genetic conservation goals in the Mojave Desert. **CDFW recommends a recirculated DEIR specifically address how the Project Proponents will reduce significant impacts to wildlife connectivity to less than significant.**

S8-61

Wildlife Connectivity, Movement Corridors, and Desert Tortoise Fencing

The environmental setting described in the DEIR does not adequately characterize the ecological importance of the Project Site as a regional wildlife movement corridor within the Mojave Desert and Mojave River Watershed. This landscape supports several native and special-status species—including desert tortoise, Mojave fringe-toed lizard, American badger, and desert kit fox, that rely on intact habitat linkages for seasonal movement, dispersal, and access to water and breeding sites.

S8-62

The Project Site intersects several critical connectivity zones identified in regional conservation planning efforts, including the California Desert Linkage Network, Rank 4/5 Areas of Conservation Emphasis (ACE), and the California Essential Habitat Connectivity (CEHC) Potential Riparian Connection. These linkages are not adequately described or mapped in the DEIR's environmental setting, despite their relevance to assessing the Project's potential to fragment habitat and disrupt wildlife movement.

While the DEIR includes mitigation measures such as MM BIG BIO-32 (wildlife Crossing), MM BIG BIO-13 (desert tortoise clearance surveys), and BIO-34 (desert tortoise fencing and clearance protocols), these do not fully address the spatial and functional requirements of maintaining connectivity across the entire Project footprint. For example, the proposed wildlife culvert at Milepost 12.5, while intended to facilitate

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movement beneath the BNSF tracks and Main Street, is undersized and hydrologically vulnerable, particularly during storm events. The culvert's design does not account for the potential for flushing and washout, which would eliminate any structural cover elements installed to enhance crossing opportunities and render the crossing ineffective for species such as the desert kit fox and other small mammals and reptiles (i.e., Mojave fringe-toed lizard). Revising the Project Site Plan and locating the wildlife crossing outside of a hydraulic culvert would allow for the permanent installation of habitat elements that would enhance crossing success of species that are hesitant to cross in open areas like American badger, bobcat, coyote, desert kit fox, small mammals, and reptiles (i.e., Mojave fringe-toed lizard). S8-63 cont'd

Moreover, the placement of crossings, including the Lead Track Extension culvert and the Main Street crossing appear disconnected from known movement corridors and habitat use patterns. Locating crossings along the Project Site, in areas with higher ecological value and connectivity potential documented in herein requested wildlife movement study, should be considered to maximize effectiveness. S8-64

The DEIR also lacks a comprehensive evaluation of impacts from exclusionary fencing. While fencing is proposed to prevent wildlife from entering hazardous areas, it may inadvertently exacerbate habitat fragmentation if not paired with effective connectivity measures. To mitigate this, CDFW recommends that the exclusionary fencing mentioned in MM BIG BIO-32 (Wildlife Crossings) and MM BIG BIO-34 (Permanent Security Fencing) should be extended at least ½ to 1 mile along both sides of all Project-related rights-of-way, including rail and road medians, and should be designed to guide wildlife toward safe crossing structures. Without such measures, fencing may act as a barrier rather than a protective feature, increasing the risk of isolation and mortality. S8-65

CDFW recommends the following revisions to MM BIG BIO-32 and MM BIG BIO-34 (edits are in **bold** and ~~strikethrough~~).

MM BIG BIO-32: Wildlife Crossings

As part of BIG construction, a wildlife crossing shall be constructed at the Unnamed Stream (Milepost 12.5) below the BNSF tracks and Main Street to facilitate wildlife movement between areas of natural habitat on either side of the railway and road. The railway crossing feature shall be placed alongside four smaller culverts constructed to convey water: three 36-inch and one 48-inch diameter culverts. The wildlife crossing shall be an 84-inch diameter culvert designed to facilitate passage beneath the rail right-of-way, which would connect open space east of the railway to the Mojave River, thereby maintaining access to existing linkages (i.e., the Rank 4/5 ACE, California Desert Linkage Network, and CEHC Potential Riparian Connection). Design features for facilitating wildlife culvert usage shall include installing inlet and outlet points. S8-66

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A long-term management plan for the wildlife crossing shall be submitted to the City for review and approval prior to start of vegetation removal and/or mass grading. The long-term management plan shall include:

- Additional measures to encourage wildlife use include, but are not limited to, maintenance or restoration of native vegetation near, but not obstructing, culvert mouths, and invasive plant removal.
- Routine clearing of debris and trash from the culvert shall be completed on a quarterly basis and following large storm events to allow ample space is available for wildlife travel.
- Access points to the culvert shall contain rocks or woody refuge sites to attract subterranean wildlife. Habitat quality (i.e., the percentage of invasive versus native plants and level of anthropogenic degradation) within a 200-meter radius surrounding the culvert access points shall be monitored quarterly by a qualified biologist to confirm wildlife corridor functionality.
- A mitigation entity responsible for the implementation of the long-term management plan.
- **Exclusionary fencing shall be extended at least ½ to 1 mile along both sides of all Project-related rights-of-way, including rail and road medians, and should be designed to guide wildlife toward safe crossing structures. Without such measures, fencing may act as a barrier rather than a protective feature, increasing the risk of isolation and mortality.**

S8-66 cont'd

MM BIG BIO-34: Permanent Security Fencing

Prior to final construction design **and upon securing a CESA ITP for CESA species**, the designated biologist shall review and **submit** ~~approve~~ the fencing plans ~~for portions~~ of the BIG Specific Plan Area **to CDFW for review and consultation** that are adjacent to natural habitats to confirm the fences provide a sufficient barrier to restrict wildlife from entering the BIG Specific Plan area.

The permanent security fencing shall be enhanced with a barrier (e.g., fine-mesh fencing) that extends at least 12 inches below ground and 12 inches above ground to prevent special status reptile and mammal species, including desert tortoise, from moving through or underneath the fencing and gaining access to the BIG Specific Plan area. Where fencing is proposed between natural habitats and roadway right-of-way, at the 12-inch depth of the below-grade portion fence apron, the barrier shall extend or be bent at an approximately 90-degree angle and oriented outward from the roadway right-of-way a minimum of 12 inches to prevent fossorial (burrowing) mammals and reptiles from digging or tunneling below the security fence and gaining access to BIG. A climber barrier (e.g., rigid curved or bent overhang) shall be installed at the top of the apron to prevent reptiles and mammals from climbing over the apron. The designated biologists shall confirm that the selected apron material and climber barrier do not cause harm,

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injury, entanglement, or entrapment to wildlife species. **Exclusionary fencing shall be extended at least ½ to 1 mile along both sides of all Project-related rights-of-way, including rail and road medians, and should be designed to guide wildlife toward safe crossing structures. Without such measures, fencing may act as a barrier rather than a protective feature, increasing the risk of isolation and mortality.**

The implementing entity shall provide quarterly inspection and repair of the fencing. The specific design and method for installation method of an apron or barrier may vary as required by regulatory permits issued under the FESA or CESA. Prior to start of operations then quarterly, biological monitors shall field-inspect the fencing that is adjacent to natural habitats and confirm appropriate installation and the implementing entity shall carry out repair of the fencing, as needed. Fencing plan review and field inspection shall be documented in a memorandum from the designated biologists and provided to **CDFW and** the City. S8-67 cont'd

In summary, CDFW recommends updating the final EIR to:

- Accurately map and describe existing wildlife corridors and habitat linkages;
- Evaluate the ecological function and hydrological performance of proposed crossings;
- Implement directional fencing and median barriers to guide wildlife toward safe crossing structures and prevent access to hazardous infrastructure;
- Analyze the spatial adequacy of crossing locations relative to known movement patterns informed by the wildlife movement study;
- Incorporate exclusionary fencing that is combined with directional fencing to support wildlife movement;
- Coordinate with CDFW and USFWS to ensure fencing and crossing designs align with species-specific needs and regional conservation goals.

S8-68

COMMENT 9: Western Joshua Tree (*Yucca brevifolia*)

CDFW appreciates that a census was conducted for western Joshua tree, a candidate species under CESA. A total of 33 western Joshua trees were documented during the census. The Project anticipates that no demolitions or ground disturbing activities would directly or indirectly impact these western Joshua tree but includes MM BIG BIO-7 (Delineation of Construction Work Limits) and MM BIG BIO-33 (Staging, Stockpiles, Material and Equipment Storage) to require delineation of work limits to prevent work in un-surveyed areas and restrictions on where to stockpile, store, or stage materials or spoils. The DEIR states that with both these measures, impacts to western Joshua tree would be less than significant. However, CDFW is particularly concerned with damage to the roots of western Joshua tree depending on the size class and proximity of a western Joshua tree to Project activities. CDFW recommends the inclusion of the below proposed MM BIG BIO-40 to ensure that if any new western Joshua sprouts or

S8-69

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individuals emerge within the Project Site or roots of western Joshua tree may be severed, authorization is obtained through an ITP.

MM BIG BIO-40: Western Joshua Tree Conservation Act Incidental Take Permit (NEW)

Prior to the initiation of ground disturbing Project activities, if the Project may result in Take of western Joshua tree (*Yucca brevifolia*) (i.e., removal, trimming, relocation, severing of roots), the Project Proponents shall obtain an incidental take permit (ITP) through compliance with the Western Joshua Tree Conservation Act (Fish & G. Code, § 1927 et seq.) or through the California Endangered Species Act (Fish & G. Code, §§ 2080 & 2085).

S8-70 cont'd

COMMENT 10: Mohave Ground Squirrel (*Xerospermophilus mohavensis*)

Section 5.4.2, Pages 5.4-41, 89

The Project footprint is at the edge of the predicted range for Mohave ground squirrel (MGS). CDFW appreciates that several focused surveys and trapping efforts were performed. While live trapping occurred in 2025 and no MGS was found, CDFW generally considers biological field assessments for wildlife to be valid for a one-year period. Therefore, depending on when the Project begins, additional surveys may be necessary to verify that MGS remains absent from the Project Site within suitable habitat. For this reason, CDFW recommends MM BIG BIO-41 be adopted in the recirculated DEIR, and if MGS is detected, then impacts shall be fully avoided, or if impacts cannot be avoided, then a CESA ITP should be obtained.

S8-71

MM BIG BIO-41: Mohave Ground Squirrel Pre-Construction Surveys (NEW)

Prior to commencement of ground disturbing Project activities, a visual survey shall be conducted by a qualified biologist during the period of March 15 through April 15 to determine presence of Mohave ground squirrel. The survey shall be conducted on the Project Site during daylight hours by the qualified biologist who can visually identify Mohave ground squirrel and white-tailed antelope squirrel and detect vocalization calls. If the survey or monitoring confirms presence, the Project Proponents shall contact CDFW immediately (within 24 hours) and fully avoid all impacts to Mohave ground squirrel or obtain an incidental take permit (ITP).

S8-72

COMMENT 11: American Badger (*Taxidea taxus*), Desert Kit Fox (*Vulpes macrotis*), and Ringtail (*Bassariscus astutus*)

S8-73

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American badger is a SSC, and desert kit fox is a fur bearing mammal protected under the California Code of Regulations (CCR) Title 14 section 460 and Fish and Game code section 4000. While American badger was not observed within the Project footprint, desert kit fox was documented within the Project Site during general and focused surveys, and the DEIR recognizes that suitable habit for both species exists with the Project footprint. As mentioned in the DEIR possible direct and indirect impacts to both species from Project activities exists, including indirect impacts from noise, vibration, and dust as well as direct impacts through harassment, injury, and/or death and concludes that "the direct impacts are potentially significant". S8-73 cont'd

The potential for ringtail to occur within the Project Site is low, as recognized in the DEIR, and thus an impact analysis was not conducted. However, ringtail is a Fully Protected Species under Fish and Game Code section 4700. Fully protected species are species that are deemed to need additional protection due to their rarity or face possible extinction. Due to this, CDFW recommends that surveys for ringtail cats be conducted prior to Project activities commencing as per the revisions to MM BIG BIO-26 below. S8-74

CDFW appreciates that several measures were incorporated to avoid and minimize impacts to American badger and desert kit fox, including MM BIG BIO-26, which requires a pre-construction survey for American badger and desert kit fox. However, CDFW is concerned that MM BIG BIO-26 only requires identifying natal dens for these species. American badger, desert kit fox, and ringtail should be protected regardless of whether they are breeding. For these reasons, CDFW recommends the below revisions to MM BIG BIO-26 (edits are in **bold** and ~~strikethrough~~).

MM BIG BIO-26: **Ringtail,** American Badger and Desert Kit Fox Construction Requirements

Prior to start of construction mobilization activities within suitable habitat, biological monitors familiar with **ringtail,** American badger**,** and desert kit fox shall conduct surveys within the limits of the BIG construction footprint for occupied ~~natal~~ dens. The survey(s) shall occur no more than 48 hours prior to start of ground-disturbing activities in suitable habitat for **ringtail,** American badger**,** and desert kit fox within the potential impact footprint. Survey results shall be provided to CDFW and the City. S8-75

If **ringtail,** American badger**,** or desert kit fox ~~natal~~ dens are documented within the survey area, a biological monitor shall establish a no-work exclusion buffer around the den and ~~natal~~ dens shall not be disturbed until a biological monitor verifies through noninvasive methods that either the den is no longer occupied, or that juveniles from **a** ~~the~~ natal den are foraging independently and capable of independent survival **and not dependent on the den**.

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A biological monitor shall monitor the ~~natal~~ den during construction activities approximately every other day **if it is a natal den or weekly otherwise**. The definitive frequency and duration of monitoring shall be dependent upon the age and behavior of the **ringtail,** American badger**,** or desert kit fox ~~pups~~ and the efficacy of the exclusion buffers, as determined by a designated biologist or biological monitor and in coordination with CDFW. Passive relocation methods may be employed for non-natal dens that cannot be avoided by construction activities. For individual, non-natal badger and kit fox dens, a plan for passive relocation, burrow monitoring, and excavation of vacated burrows will be developed in coordination with CDFW.

S8-75 cont'd

COMMENT 12: Swainson's Hawk (*Buteo swainsoni*)

CDFW appreciates the inclusion of MM BIG BIO-20 for Swainson's hawk and the surveys conducted in the preparation for the DEIR. CDFW recommends the following minor changes to MM BIG BIO-20 to be included in the recirculated DEIR as follows (edits are in ~~strikethrough~~ and **bold**):

MM BIG BIO-20: Swainson's Hawk Construction Requirements

Swainson's hawk nest surveys shall be conducted **during the breeding season immediately prior to start of construction** and provided to the City **and CDFW** ~~for the breeding season~~ ~~immediately prior to start of construction~~. Surveys shall be conducted within the ~~annual~~ area of **the** BIG **Project** construction **footprint** plus a 0.5-mile buffer by agency-approved Species-Specific biological monitors following the protocol outlined in the *Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley* (Swainson's Hawk Technical Advisory Committee, 2000). The Species-Specific biological monitor shall be familiar with Swainson's hawk identification and life history and be approved to conduct surveys by CDFW.

S8-76

If active Swainson's hawk nests are found during nest surveys, the Species-Specific biological monitor shall establish an appropriate avoidance buffer around each nest in consultation with CDFW based on work activities proposed. The avoidance buffer will remain in place until a Species-Specific biological monitor confirms that the Swainson's hawk young have fledged or the nest is no longer active. **If full avoidance of active Swainson's hawk nest(s) cannot be achieved, the Project Proponent shall obtain an ITP.**

COMMENT 13: Bats

CDFW appreciates that an impact analysis was conducted for bats and that MM BIG BIO-27 was included, which requires pre-construction surveys, avoidance of maternity roosts, and roost replacement. Bats are important for pest management as the primary predators of nocturnal flying insects, but bat populations are declining throughout

S8-77

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southern California due to the loss of roosting habitat from development and a low reproductive turnover. Most bat species only have one young per year, and juvenile mortality is very high. It can take many years for a bat colony to recover from any impacts that result in mortality or a decrease in reproductive ability. The protection of bat roosting habitats, particularly habitats identified as maternity or nursery sites, is vitally important to prevent adverse effects to, and further loss of, remaining bat populations. Impacts to bat maternity colonies could be considered potentially significant.

S8-77 cont'd

CDFW's only concern with MM BIG BIO-27 is that the measure is specific to special status bats. Bat species are protected by the California Fish and Game Code section 4150, which prohibits Take of naturally occurring nongame mammals, including bats. As such CDFW recommends MM BIG BIO-27 is revised to be encompassing of all bats regardless of special status, as per below (edits are in **bold** and ~~strikethrough~~).

MM BIG BIO-27: Bat Construction Requirements

Prior to start of demolition or disturbance of structures suitable for roosting (i.e., bridges), pre-construction surveys for ~~special-status~~ bat species shall be conducted by a biological monitor. Pre-construction surveys shall be conducted no more than 14 days prior to the start of demolition activities. Survey results shall be provided to CDFW and the City. If active bat roosting is documented during pre-construction surveys within structures to be impacted, bat exclusion techniques, consistent with recommendations provided in Caltrans Bat Mitigation: A Guide to Developing Feasible and Effective Solutions (H. T. Harvey & Associates, 2019), shall be implemented. If required, exclusion shall be implemented between September 1 and October 15 to the extent feasible. Exclusion shall not occur during the typical bat maternity season (April through August).

S8-78

Prior to demolition and/or improvement of structures that could support roosting bats, including Hinkley Road Bridge, or trees that will be removed, a biologist with expertise in chiropterology (study of bats) shall survey these features and any areas that could provide suitable roosting habitat to confirm they do not contain maternity roosts or ~~special-status~~ bats. If ~~special-status~~ bats and/or maternity roosts are confirmed to be absent, MM BIG BIO-1 above will be followed prior to construction to reduce potential impacts to individual roosting bats to a less than significant level and no further mitigation is required. If a potential maternity roost and/or ~~a special status~~ **other type of** bat roost is present, a Bat Avoidance and Mitigation Plan shall be developed in coordination with the City and CDFW, which may include the following measures to reduce potential impacts to ~~special-status~~ bat species to a less than significant level.

- Maternity Roosting Season Avoidance. All proposed demolition activities of active roost sites, including bat roost exclusion, shall occur outside the general bat maternity roosting season of March through August to reduce potentially significant

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impacts to maternity roosting bats. If the maternity roosting season cannot be avoided, then roost exclusion can occur outside the maternity roosting season (September through February) to exclude bats from the demolition area prior to the start of demolition during the maternity roosting season. The measures below shall be required to ensure to avoid impacts to roosting bats during the exclusion process.

- Replacement Roost Installation. If there is a potential or known maternity roost within a structure to be demolished, a replacement roost shall be installed outside the maternity roosting season. At least one month prior to the exclusion of bats from a roost, the implementing entity shall procure and install two or more (dependent on colony size) bat boxes from a reputable vendor, such as Bat Conservation and Management, to allow bats sufficient time to acclimate to a new potential roost location. The bat boxes shall be installed within close proximity to the trees and/or structures and in an area that is within close proximity to suitable foraging habitat (i.e., near the Mojave River). Additionally, the bat boxes shall be oriented to the south or southwest, and the area chosen for the bat boxes must receive sufficient sunlight (at least 6 hours) to allow the bat boxes to reach an optimum internal temperature (approximately 90°F) to mimic the existing bat roost. The bat boxes shall be suitable to house crevice roosting bat species, and large enough to contain a minimum of 50 bats (e.g., Four Chamber Premium Bat House or Bat Bunker Plus). The bat boxes shall be installed on a 20-foot-tall steel pole.
- Roost Exclusion. Roost exclusion must only occur during the time when bats are most active (early spring or fall) to increase the potential to exclude all bats from City of Barstow Proposed General Plan and Barstow International Gateway Project EIR Draft Environmental Impact Report 5.4-94 5.4 | Biological Resources roosts and avoid the maternity roosting season, thereby minimizing the potential for a significant impact to occur. Approximately one month after bat boxes have been installed, exclusion of the existing roost shall occur. The primary exit points for roosting bats shall be identified, and all secondary ingress/egress locations shall be covered with a tarp or wood planks to prevent bats from leaving from other locations. The primary exit point shall remain uncovered to allow exclusion devices to be installed. Exclusion devices shall consist of a screen (poly netting, window screen, or fiberglass screening) with mesh 1/6 of an inch or smaller, installed at the top of the roost location and sealed along the sides and passing 2 feet below the bottom of the primary exit point. The exclusion devices shall be installed at night to increase the potential that bats have already left the roost and are less likely to return. Exclusion devices shall be left in place for a 1-week period to ensure that any remaining bats in the roost are excluded. A passive acoustic monitoring detector shall also be deployed during the exclusion period in order to verify excluded species and monitor if bat activity has decreased during the exclusion period. Periodic monitoring during the exclusion period should also be conducted to observe if any bats are still emerging from additional areas at BIG, and an active monitoring survey conducted on the final night of exclusion to ensure that no bats are emerging and determine that exclusion has been successful. Any continued presence of roosting bats shall

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require an adjustment to the exclusion devices and schedule. The exclusion devices may remain in place until the start of demolition activities. If any bats are found roosting in any proposed demolition areas prior to demolition, additional exclusion shall be required and follow the same methodology described in this mitigation measure.

- Roost Habitat Creation. If sensitive bat species are present within Hinkley Road Bridge or other structures that will persist post BIG construction but require bat displacement for improvements to be made, bat friendly roost designs shall be developed as part of Project plans as feasible. Bat friendly designs shall be developed in coordination with a qualified biologist, the City, and CDFW.

S8-78 cont'd

COMMENT 14: American Beaver (*Castor canadensis*)

American beaver is a furbearing mammal protected by Fish and Game code section 4000. During surveys one American beaver was incidentally observed swimming upstream in the Mojave River near the Project footprint. CDFW appreciates that the Project Proponents will place an area compromising approximately 500 feet on either side of the Mojave River within the Project footprint under a conservation easement. The DEIR establishes that this conserved area would provide a buffer between where American beaver would be expected to occur (i.e., within the Mojave River) and construction activities. However, to quote the Project's Biological Resources section, section 5.4: "should an individual be present during construction activities, construction could result in direct impacts to American beaver through harassment, injury, and/or death. Increased noise, vibration, and dust generated by construction equipment could also result in indirect impacts related to habitat disturbance. Indirect impacts would be potentially significant and would require mitigation."

S8-79

CDFW appreciates the inclusion of MM BIG BIO-25 (Dry Season Construction) which restricts construction within the Mojave River to the dry season to the extent feasible or requires surveys for American beaver if work within the dry season cannot occur. While MM BIG BIO-25 proposes full avoidance of American beaver, CDFW recommends the following edits to MM BIG BIO-25 to be incorporated in the recirculated DEIR to require mitigation if impacts to American beaver are determined to be unavoidable (edits are in **bold** and ~~strikethrough~~):

MM BIG BIO-25: Dry Season Construction

Construction within the Mojave River corridor shall be restricted to the dry season when there are no observable surface flows within 1,000 feet of the BIG construction footprint, to the extent feasible. If construction must occur outside of the dry season, biological monitors shall conduct daily pre-construction sweeps within 250 feet of direct impact areas occurring within the Mojave River corridor, such as construction associated with the Hinkley Road Bridge. If American beaver is observed, construction cannot be

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initiated until the species is able to disperse from the area. Construction activities may resume after a biological monitor confirms American beaver is no longer present within direct and indirect impact area. **If impacts to American beaver are unavoidable, the Project Proponents shall not commence Project activities at the locations where American beaver are found and contact CDFW immediately within 24 hours to discuss proper avoidance, minimization, and mitigation. Mitigation shall occur at no less than a 3:1 mitigation impact ratio and shall include land acquisition, permanent conservation through a conservation easement, and management in perpetuity through an endowment.** S8-80 cont'd

COMMENT 15: Rare and Special Status Native Plants

CDFW appreciates the inclusion of MM BIG BIO-37 for the protection and salvage of any plant species regulated under the California Desert Native Plant Act (DNPA) and County of San Bernardino Code § 88.01.060 for protection. However, this measure does not preserve, avoid, or minimize the potential impacts to rare, sensitive, species of special concern, or other native plants identified by CDFW and California Native Plant Society (CNPS) that are not protected by the CDNPA or County Code § 88.01.060. CDFW recommends the following minor edits to MM BIG BIO-37 to be incorporated in the recirculated EIR (edits are in **bold** and ~~strikethrough~~):

MM BIG BIO-37: Desert Native Plant Salvage Plan S8-81

Prior to start of construction mobilization activities, the implementing entity shall prepare a Desert Native Plant Salvage Plan for the removal of any plant species regulated under the CDNPA and County Code § 88.01.060**, as well as any rare, sensitive, species of special concern, or other native plants identified by CDFW or CNPS.** Adequate mitigation for CDNPA/County-protected **and rare and sensitive** plants may include the salvage of plants for translocation to a suitable recipient site if removal cannot be avoided. In the case of translocation, the Desert Native Plant Salvage Plan shall be prepared for review and approval by the City **and CDFW.** The plan shall include a description and map showing plants to be salvaged, salvage and transport methods, the proposed recipient site, and disposition of the plant specimens at the recipient site. Recipient sites may include existing conservation areas, botanical preserves, museums and zoological societies, among other conservation organizations that provide adequate habitat and management of desert native plants.

COMMENT 16: Lake and Streambed Alteration (LSA) Program Notifications

Section 5, Pages 5.4-29, 5.10-6, 65 to 68, 74 S8-82

CDFW appreciates that a Lake and Streambed Alteration Agreement (LSA Agreement) will be obtained as part of MM BIG BIO-29 and that coordination has begun with CDFW

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on the notification pursuant to Fish and Game Code section 1602. CDFW is concerned that MM BIG BIO-29 states that a minimum compensatory mitigation ratio of 1:1 will be required. Please note that CDFW will determine the appropriate mitigation ratio in the LSA Agreement. For this reason, CDFW proposes the edits below, to this section of MM BIG BIO-29 only, for adoption in the recirculated EIR (edits are in **bold** and ~~strikethrough~~):

"Compensatory mitigation to offset impacts on jurisdictional aquatic resources may be implemented through on-site and/or off-site permittee-responsible mitigation, mitigation bank credit purchase (e.g., purchase of enhancement and/or preservation credits at the Mojave River Watershed Mitigation Bank or other approved mitigation bank), or a combination of these options depending on availability. The proposed mitigation strategy shall prioritize in-kind and in-watershed options per the regulatory agencies' preferences. A minimum compensatory mitigation ratio of **no less than** 1:1 will be required; final mitigation ratios and credits shall be determined **by** ~~in consultation with~~ USACE, RWQCB, and CDFW based on agency evaluation of current resource functions and values and through each agency's respective permitting process." S8-82 cont'd

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNNDB field survey form can be filled out and submitted online at the following link: https://wildlife.ca.gov/Data/CNDDB/Submitting-Data. The types of information reported to CNDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals. S8-83

ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying Project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.) S8-84

CONCLUSION S8-85

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CDFW appreciates the opportunity to comment on the DEIR to assist the City of Barstow and the Project Proponents in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Scott Jakubowski, Senior Environmental Scientist, at (909) 354-0919 or scott.jakubowski@wildlife.ca.gov.

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Sincerely,

DocuSigned by:
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84FBB8273E4C480...

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FIGURES

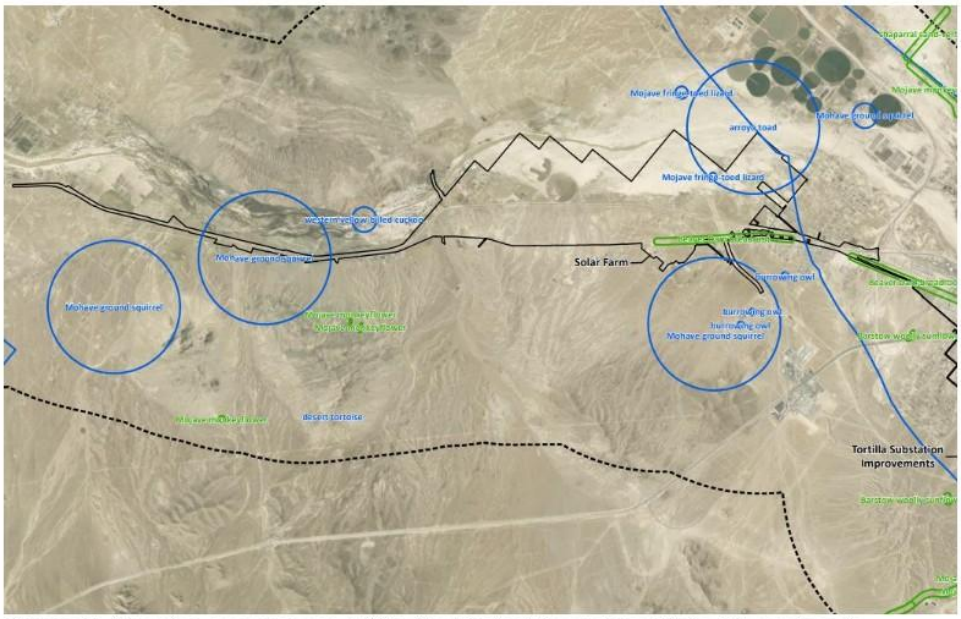


Figure 1. Species occurrences within the Project boundary. Project boundary is depicted by a solid black line.

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ATTACHMENTS

Attachment 1: March 25, 2025 CDFW Comment Letter
Attachment 2: Mitigation and Monitoring Reporting Program (MMRP)

S8-87

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Attachment 2
Mitigation Monitoring and Reporting Plan

Measure Number	Biological (BIO) Mitigation Measure (MM)	Implementation Schedule	Responsible Party
MM BIG BIO-13	Desert Tortoise Clearance Surveys: Prior to commencement of Project activities, desert tortoise exclusion fencing shall be installed and maintained according to a CESA ITP and Biological Opinion to avoid take of desert tortoise during Project activities, including destruction of nests or their potential habitat in the impact footprint, where individuals are known to occur, recent sign has been observed, or construction activities have the potential to result in take. A qualified Species-Specific biological monitor shall first conduct a pre-construction survey for desert tortoise according to the CESA ITP at the locations where exclusionary fencing will be installed and translocate or relocate any desert tortoise present at exclusionary fence installation locations as required by the CESA ITP and only then the exclusionary fencing shall be installed and the qualified Species-Specific biological monitor shall be present during exclusion fence installation. Desert tortoise exclusion fencing in desert tortoise habitat shall be constructed to standards outlined in Chapter 8 of the Desert Tortoise (Mojave Population) Field Manual (*Gopherus agassizii*) (USFWS, 2009b) and shall be used to delineate the area. The desert tortoise exclusion fencing shall	Prior to commencing ground- or vegetation-disturbing activities	Project Proponents and Qualified Biologist

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	be maintained and monitored daily during the desert tortoise activity period (i.e., early March through early June and September through early November) to allow for fencing to be maintained in good condition, and to determine if tortoises are "trapped" along the fencing searching for a way to access the other side. Outside of the desert tortoise activity period, fence inspections shall occur at least once weekly by a qualified Species-Specific biological monitor. If failures in the exclusion fence are documented, desert tortoise clearance surveys shall be repeated for affected areas. At the discretion of the CESA ITP and Biological Opinion, desert tortoise exclusion fencing design shall incorporate areas of shade and/or predation protection (e.g., artificial burrows) in the event a desert tortoise becomes trapped along the fence. Desert tortoise guards, or other agency approved design, shall be installed and connected to the exclusionary fencing at construction area entry points to prohibit desert tortoise from crossing into the construction right-of-way. The desert tortoise guard shall have a clear escape route away from construction activity for any desert tortoise that should fall into the guard. The guard shall be inspected daily by a qualified biological monitor for desert tortoise and to ensure the escape route is free of obstruction and debris. Immediately following the installation of desert tortoise exclusion fencing, Species Specific biological monitors		

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	and/or designated biologists approved by USFWS in accordance with the Desert Tortoise Authorized Biologist Qualifications Form (Section 3.2) of the *Desert Tortoise (Mojave Population) Field Manual (Gopherus agassizii*) (USFWS, 2009b) and CDFW shall conduct clearance surveys in suitable habitat for desert tortoise. The survey(s) shall be conducted in general accordance with Chapter 6 of the *Desert Tortoise (Mojave Population) Field Manual (Gopherus agassizii*) (USFWS, 2009) or current clearance survey protocol and shall align with requirements in the CESA ITP and Biological Opinion. Survey results shall be provided to the City, CDFW, and USFWS. If active desert tortoise burrows are identified in the impact footprint during desert tortoise clearance surveys and required to be moved off site, a desert tortoise translocation plan will be implemented as approved by USFWS and CDFW. All unoccupied desert tortoise pallets and burrows that are not practical to avoid shall be examined and excavated by hand during the clearance survey by the qualified Species Specific biological monitors and collapsed to prevent reentry following the procedures and precautions outlined in the *Desert Tortoise (Mojave Population) Field Manual (Gopherus agassizii)* (USFWS, 2009b), CESA ITP, and Biological Opinion.		

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MM BIG BIO-14	Desert Tortoise Relocation and Translocation: Prior to start of Project activities, a designated biologist approved by CDFW through a CESA ITP and USFWS through a Biological Opinion shall prepare a BIG-specific Desert Tortoise Translocation Plan, based on the *Translocation of Mojave Desert Tortoises from Project Sites: Plan Development Guidance* (USFWS, 2020), H*ealth Assessment Procedures for the Mojave Desert Tortoise (Gopherus agassizii): A Handbook Pertinent to Translocation* (USFWS, 2016) and *Desert Tortoise (Mojave Population) Field Manual (Gopherus agassizii)* (USFWS, 2009b) or other current USFWS guidelines and in accordance with applicable Incidental Take Permits and Biological Opinions. The BIG-specific Desert Tortoise Translocation Plan shall identify suitable relocation and translocation sites, provide details on desert tortoise surveys and for moving desert tortoise out of harm's way, and include the methodology for visual desert tortoise body condition assessments. ~~A~~ The designated biologist shall provide the BIG-specific Desert Tortoise Translocation Plan to the USFWS and CDFW for review and approval at least 30 days prior to start of Project activities before translocation. At a minimum, the Desert Tortoise Translocation Plan shall include the following measures: • The qualified Species-Specific biological monitor or the designated biologist shall implement the Desert Tortoise Translocation Plan during BIG	Prior to commencing ground- or vegetation-disturbing activities	Project Proponents and Qualified Biologist

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	construction. Only qualified Species-Specific biological monitors or designated biologists authorized by the USFWS and CDFW to handle desert tortoise shall move the animal and project-specific ITPs for desert tortoise shall be acquired under CESA and FESA prior to such actions. • The approved Species-Specific biological monitor or designated biologist shall move the desert tortoise found in construction work areas out of danger outside of the potential impact footprint, following the procedures and conditions outlined in the Incidental Take Permit and Biological Opinion. • Prior to the approved Species-Specific biological monitor or designated biologist moving desert tortoise out of the construction work area, the biological monitor or designated biologist shall survey the relocation and translocation site to confirm that suitable burrows for desert tortoise exist. If few or no burrows are available, artificial burrows and/or shade structures shall be created along the outer perimeter of the desert tortoise exclusion fencing following the guidelines in the *Desert Tortoise (Mojave Population) Field Manual (Gopherus agassizii)* (USFWS 2009b) and *Shade Structures for Desert Tortoise Exclusion Fence: Design Guidance* (USFWS 2018), or as updated or replaced by the USFWS and in accordance with the CESA ITP and Biological Opinion. • If needed, artificial burrows shall be installed outside of the construction work area (along the outer perimeter of the desert tortoise exclusion fencing if applicable) from where the individual was relocated to provide cover and		

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	prevent exposure to predators and dehydration. Prior to excavation of an occupied burrow, artificial burrows shall be installed.		
MM BIG BIO-16	Desert Tortoise Compensatory Mitigation Plan: Prior to start of Project activities, the implementing entity shall prepare a Compensatory Mitigation Plan (CMP) proposed to CDFW in the CESA ITP application that describes the compensatory mitigation that shall be provided at a minimum 1:1 ratio to offset permanent and temporary impacts on desert tortoise habitat. The CMP shall describe the following: • A description of desert tortoise and habitat types for which compensatory mitigation is being proposed. • A description of the methods used to identify and evaluate mitigation options. Options may include one or more of the following: ○ Purchase of mitigation credits from an agency-approved mitigation bank (e.g., Mojave Desert Tortoise Conservation Bank or other CDFW/USFWS approved mitigation bank). ○ Incidental take permit coverage through an existing agency general conservation plan (e.g., USFWS Desert Tortoise General Conservation Plan). ○ Protection of desert tortoise habitat through acquisition and a conservation easement and funding for	Prior to commencing ground- or vegetation-disturbing activities	Project Proponents

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	long-term management of the habitat. Endowment funds shall be transferred to the applicable agency or entity approved by CDFW and USFWS and the conservation easements shall be held by an entity approved in writing by the applicable regulatory agency; for example, CDFW and USFWS. In circumstances where BNSF protects habitat through a conservation easement, the terms of the conservation easement shall be subject to approval of the applicable regulatory agencies, such as CDFW and USFWS and the conservation easement shall identify applicable regulatory agencies as third-party beneficiaries with a right of access to the easement areas. • A summary of the estimated direct permanent and temporary impacts on desert tortoise and desert tortoise habitat. • A description of the process that is proposed to be used to confirm impacts. Actual impacts on desert tortoise and desert tortoise habitat could differ from estimates. Should this occur, compensatory mitigation shall occur as determined by CDFW and USFWS. CDFW shall describe in the CESA ITP the process for satisfying compensatory mitigation. Final compensatory mitigation in a CESA ITP shall be determined by CDFW. The CMP shall be submitted to the City.		
MM BIG BIO-20	Swainson's Hawk Construction Requirements: Swainson's hawk nest surveys shall be conducted during the breeding season immediately prior to start of construction	Prior to commencing ground- or vegetation-disturbing activities	Project Proponents and Qualified Biologist

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	and provided to the City and CDFW. Surveys shall be conducted within the annual area of the BIG Project construction footprint plus a 0.5-mile buffer by agency-approved Species-Specific biological monitors following the protocol outlined in the *Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley* (Swainson's Hawk Technical Advisory Committee, 2000). The Species-Specific biological monitor shall be familiar with Swainson's hawk identification and life history and be approved to conduct surveys by CDFW. If active Swainson's hawk nests are found during nest surveys, the Species-Specific biological monitor shall establish an appropriate avoidance buffer around each nest in consultation with CDFW based on work activities proposed. The avoidance buffer will remain in place until a Species-Specific biological monitor confirms that the Swainson's hawk young have fledged or the nest is no longer active. If full avoidance of active Swainson's hawk nest(s) cannot be achieved, the Project Proponent shall obtain an ITP.		
MM BIG BIO-21	Western Burrowing Owl Construction Requirements: No less than 14 days prior to the start of any Project activities within suitable habitat, a qualified Species-Specific biological monitor shall conduct pre-construction surveys for burrowing owl and/or occupied nest burrows within the limits of the BIG construction footprint plus a 500-foot buffer, according to the 2012 Staff Report on Burrowing Owl Mitigation.	Prior to commencing ground- or vegetation-disturbing activities	Project Proponents and Qualified Biologist

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	Additionally, time lapses between BIG construction within suitable habitat shall trigger subsequent take avoidance surveys including but not limited to a final survey conducted within 24 hours prior to ground disturbance. The pre-construction surveys shall be repeated if there is a time lapse between construction activities of 14 days or more within previously surveyed areas. All surveys shall be conducted in accordance with the most current CDFW survey methods. If burrowing owl, active burrows, or sign (e.g., molted feathers, cast pellets, prey remains, eggshell fragments, decoration, or excrement) are not observed during the pre-construction surveys, no additional conditions shall be required to avoid direct impacts on burrowing owl within the surveyed areas. If burrowing owl is documented during pre-construction surveys, occupied burrowing owl burrows shall not be disturbed during the nesting season (February 1 through August 31) and all impacts to burrowing owl shall be fully avoided until a CDFW-approved Species-Specific biological monitor verifies through non-invasive methods that either the birds have abandoned or failed nesting attempts, or that juveniles from the occupied burrows are foraging independently and capable of independent survival. A Species-Specific biological monitor shall establish exclusion buffers to protect active nests in accordance with the recommendations included in CDFW's		

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	Staff Report on Burrowing Owl Mitigation (2012 or most recent version) for projects with a "High" level of disturbance. A qualified Species-Specific biological monitor shall conduct ongoing monitoring during construction activities. If burrowing owl is observed during the non-breeding season (September 1 through January 31) or confirmed to not be nesting during pre-construction surveys, a non-disturbance buffer between construction activities and the occupied burrow shall be installed by a qualified Species-Specific biological monitor in accordance with the recommendations included in the Staff Report on Burrowing Owl Mitigation (CDFW, 2012 or most recent version) for projects with a "High" level of disturbance. The implementing entity shall submit at least one burrowing owl pre-construction survey report for each surveyed area to the satisfaction of CDFW to document compliance with BIG's western burrowing owl mitigation measures. Survey reports shall also be submitted to the City. If full avoidance is not possible, either directly or indirectly, an Incidental Take Permit (ITP) under CESA shall be obtained from CDFW and a Burrowing Owl Plan shall be prepared and submitted for review and approval by CDFW. The plan shall also be submitted to the City. Once approved by CDFW, the plan, in conjunction with the CESA ITP, shall be implemented to relocate non-breeding burrowing owls from BIG.		

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	The plan and CESA ITP shall detail methods for relocation of burrowing owls and provide guidance for the monitoring and management of the replacement burrow sites and associated reporting requirements. Details of the Burrowing Owl Plan shall be determined in consultation with CDFW, and is anticipated to include, but may not be limited to, the following: • Proposed avoidance, and monitoring actions. • Number and location of occupied burrow sites, acres of burrowing owl habitat that will be impacted, details of site monitoring, and details on proposed buffers and other avoidance measures if avoidance is proposed. • Seasonal restrictions of relocation efforts – Relocation efforts shall occur during the non-breeding season (September 1 through January 31). Relocation during the breeding season (February 1 through August 31) may only occur if a qualified biologist determines that the birds have not begun egg-laying, or that the fledged juveniles are foraging independently and are capable of independent survival. • Climatic restrictions of relocation efforts – Relocation shall not occur when temperatures exceed 8~~9~~5 degrees Fahrenheit or during rain or high wind. • Monitoring schedule and length – Full-time monitoring shall occur for at least two weeks following passive relocation and periodically thereafter or as required by the CESA ITP.		

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MM BIG BIO-22	Western Burrowing Owl Compensatory Mitigation: Prior to the start of any Project activities, the implementing entity shall provide compensatory mitigation for burrowing owl as described in a CESA ITP and shall prepare a Compensatory Mitigation Plan (CMP) to be included in the CESA application that describes the compensatory mitigation that the implementing entity proposes to provide at a minimum 1:1 ratio to offset permanent and temporary impacts on burrowing owl habitat. The CMP shall describe the following: • A description of burrowing owl and habitat types for which compensatory mitigation is being proposed. • A description of the methods used to identify and evaluate mitigation options. Options may include one or more of the following: ○ Purchase of mitigation credits from CDFW-approved conservation and/or mitigation bank, if CESA credits for burrowing owl are available. ○ Protection of burrowing owl habitat a conservation easement and funding for long-term management of the habitat. Endowment funds shall be transferred to the applicable agency or entity and conservation easements shall be held by an entity approved in writing by CDFW. Terms of the conservation easement shall be subject to approval of CDFW, and the conservation easement shall identify CDFW as third-party beneficiary with a right of access to the easement areas. • A summary of the estimated direct permanent and temporary Project	Prior to commencing ground- or vegetation-disturbing activities	Project Proponents

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	impacts on burrowing owl and burrowing owl habitat. • A description of the process that is proposed to be used to confirm Project impacts. Actual Project impacts on burrowing owl and burrowing habitat could differ from estimates. Should this occur, the Permittee shall be responsible for providing compensatory mitigation for final Project impacts. The burrowing owl CMP shall be updated per the requirements in the CESA ITP and mitigation requirements shall be submitted to the City for review. If all or any portion of required compensatory mitigation lands/credits meet the criteria for burrowing owl compensatory mitigation in the CESA ITP, it may be used to fulfill that portion of the obligation for burrowing owl compensatory mitigation requirements.		
MM BIG BIO-24	Mojave Fringe-toed Lizard and Compensatory Mitigation: Prior to Project activities, the implementing entity shall prepare a compensatory mitigation plan for direct impacts on Mojave fringe-toed lizard and 1,009.1 acres of occupied dune habitat (active desert dunes, stabilized and partially stabilized dunes, disturbed stabilized and partially stabilized dunes). Dune habitat shall be mitigated ~~in-kind~~ through the acquisition and preservation of dune habitat suitable for Mojave fringe-toed lizard at a minimum 3~~1~~:1 ratio to offset permanent and temporary impacts on Mojave fringe-toed lizard habitat. Land selected for compensatory mitigation must be:	Prior to commencing ground- or vegetation-disturbing activities	Project Proponents

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	• Deposits of aeolian or fine windblown sands associated with dunes, washes, hillsides, margins of dry lakes, and/or sandy hummocks within the Mojave Desert; • Occupied with Mojave fringe-toed lizard or with potential for connectivity to lands occupied by Mojave fringe-toed lizard; • Within the Mojave River Watershed; • Near land currently under or planned for protection; and • Not characterized as highly disturbed. A long-term management plan and endowment for land acquisition, preservation, and management in perpetuity shall be established by a qualified land manager/conservancy. Final compensatory mitigation for Mojave fringe-toed lizard shall be determined in coordination with CDFW.		
MM BIG BIO-25	Dry Season Construction: Construction within the Mojave River corridor shall be restricted to the dry season when there are no observable surface flows within 1,000 feet of the BIG construction footprint, to the extent feasible. If construction must occur outside of the dry season, biological monitors shall conduct daily pre-construction sweeps within 250 feet of direct impact areas occurring within the Mojave River corridor, such as construction associated with the Hinkley Road Bridge. If American beaver is observed, construction cannot be initiated until the species is able to disperse from the area. Construction	During Project Construction	Project Proponents

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	activities may resume after a biological monitor confirms American beaver is no longer present within direct and indirect impact area. If impacts to American beaver are unavoidable, the Project Proponents shall not commence Project activities at the locations where American beaver are found and contact CDFW immediately within 24 hours to discuss proper avoidance, minimization, and mitigation. Mitigation shall occur at no less than a 3:1 mitigation impact ratio and shall include land acquisition, permanent conservation through a conservation easement, and management in perpetuity through an endowment.			
MM BIG BIO-26	Ringtail, American Badger, and Desert Kit Fox Construction Requirements: Prior to start of construction mobilization activities within suitable habitat, biological monitors familiar with ringtail, American badger, and desert kit fox shall conduct surveys within the limits of the BIG construction footprint for occupied dens. The survey(s) shall occur no more than 48 hours prior to start of ground-disturbing activities in suitable habitat for ringtail, American badger, and desert kit fox within the potential impact footprint. Survey results shall be provided to CDFW and the City. If ringtail, American badger, or desert kit fox dens are documented within the survey area, a biological monitor shall establish a no-work exclusion buffer around the den and dens shall not be disturbed until a biological monitor verifies through noninvasive methods that either the den is no longer	Prior to commencing ground- or vegetation-disturbing activities	Project Proponents and Qualified Biologist	S8-88 cont'd

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	occupied, or that juveniles from a ~~the~~ natal den are foraging independently and capable of independent survival and not dependent on the den. A biological monitor shall monitor the den during construction activities approximately every other day if it is a natal den or weekly otherwise. The definitive frequency and duration of monitoring shall be dependent upon the age and behavior of the ringtail, American badger, or desert kit fox and the efficacy of the exclusion buffers, as determined by a designated biologist or biological monitor and in coordination with CDFW. Passive relocation methods may be employed for non-natal dens that cannot be avoided by construction activities. For individual, non-natal badger and kit fox dens, a plan for passive relocation, burrow monitoring, and excavation of vacated burrows will be developed in coordination with CDFW.		
MM BIG BIO-27	Bat Construction Requirements: Prior to start of demolition or disturbance of structures suitable for roosting (i.e., bridges), pre-construction surveys for bat species shall be conducted by a biological monitor. Pre-construction surveys shall be conducted no more than 14 days prior to the start of demolition activities. Survey results shall be provided to CDFW and the City. If active bat roosting is documented during pre-construction surveys within structures to be impacted, bat exclusion techniques, consistent with recommendations provided in Caltrans Bat Mitigation: A Guide to Developing	Prior to Project activities	Project Proponents

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	Feasible and Effective Solutions (H. T. Harvey & Associates, 2019), shall be implemented. If required, exclusion shall be implemented between September 1 and October 15 to the extent feasible. Exclusion shall not occur during the typical bat maternity season (April through August). Prior to demolition and/or improvement of structures that could support roosting bats, including Hinkley Road Bridge, or trees that will be removed, a biologist with expertise in chiropterology (study of bats) shall survey these features and any areas that could provide suitable roosting habitat to confirm they do not contain maternity roosts or bats. If bats and/or maternity roosts are confirmed to be absent, MM BIG BIO-1 above will be followed prior to construction to reduce potential impacts to individual roosting bats to a less than significant level and no further mitigation is required. If a potential maternity roost and/or other type of bat roost is present, a Bat Avoidance and Mitigation Plan shall be developed in coordination with the City and CDFW, which may include the following measures to reduce potential impacts to bat species to a less than significant level. • Maternity Roosting Season Avoidance. All proposed demolition activities of active roost sites, including bat roost exclusion, shall occur outside the general bat maternity roosting season of March through August to reduce potentially significant impacts to maternity roosting bats. If the maternity roosting season cannot be avoided, then roost exclusion can occur outside the maternity roosting season		

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	(September through February) to exclude bats from the demolition area prior to the start of demolition during the maternity roosting season. The measures below shall be required to ensure to avoid impacts to roosting bats during the exclusion process. • Replacement Roost Installation. If there is a potential or known maternity roost within a structure to be demolished, a replacement roost shall be installed outside the maternity roosting season. At least one month prior to the exclusion of bats from a roost, the implementing entity shall procure and install two or more (dependent on colony size) bat boxes from a reputable vendor, such as Bat Conservation and Management, to allow bats sufficient time to acclimate to a new potential roost location. The bat boxes shall be installed within close proximity to the trees and/or structures and in an area that is within close proximity to suitable foraging habitat (i.e., near the Mojave River). Additionally, the bat boxes shall be oriented to the south or southwest, and the area chosen for the bat boxes must receive sufficient sunlight (at least 6 hours) to allow the bat boxes to reach an optimum internal temperature (approximately 90°F) to mimic the existing bat roost. The bat boxes shall be suitable to house crevice roosting bat species, and large enough to contain a minimum of 50 bats (e.g., Four Chamber Premium Bat House or Bat Bunker Plus). The bat boxes shall be installed on a 20-foot-tall steel pole. • Roost Exclusion. Roost exclusion must only occur during the time when bats are most active (early spring or fall) to increase the potential to exclude all		

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	bats from City of Barstow Proposed General Plan and Barstow International Gateway Project EIR Draft Environmental Impact Report 5.4-94 5.4 | Biological Resources roosts and avoid the maternity roosting season, thereby minimizing the potential for a significant impact to occur. Approximately one month after bat boxes have been installed, exclusion of the existing roost shall occur. The primary exit points for roosting bats shall be identified, and all secondary ingress/egress locations shall be covered with a tarp or wood planks to prevent bats from leaving from other locations. The primary exit point shall remain uncovered to allow exclusion devices to be installed. Exclusion devices shall consist of a screen (poly netting, window screen, or fiberglass screening) with mesh 1/6 of an inch or smaller, installed at the top of the roost location and sealed along the sides and passing 2 feet below the bottom of the primary exit point. The exclusion devices shall be installed at night to increase the potential that bats have already left the roost and are less likely to return. Exclusion devices shall be left in place for a 1-week period to ensure that any remaining bats in the roost are excluded. A passive acoustic monitoring detector shall also be deployed during the exclusion period in order to verify excluded species and monitor if bat activity has decreased during the exclusion period. Periodic monitoring during the exclusion period should also be conducted to observe if any bats are still emerging from additional areas at BIG, and an active monitoring survey conducted on the final night of exclusion to ensure that no bats are emerging and			S8-88 cont'd

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	determine that exclusion has been successful. Any continued presence of roosting bats shall require an adjustment to the exclusion devices and schedule. The exclusion devices may remain in place until the start of demolition activities. If any bats are found roosting in any proposed demolition areas prior to demolition, additional exclusion shall be required and follow the same methodology described in this mitigation measure. • Roost Habitat Creation. If sensitive bat species are present within Hinkley Road Bridge or other structures that will persist post BIG construction but require bat displacement for improvements to be made, bat friendly roost designs shall be developed as part of Project plans as feasible. Bat friendly designs shall be developed in coordination with a qualified biologist, the City, and CDFW.		
MM BIG BIO-29	This section of MM BIG BIO-29 Only: "Compensatory mitigation to offset impacts on jurisdictional aquatic resources may be implemented through on-site and/or off-site permittee-responsible mitigation, mitigation bank credit purchase (e.g., purchase of enhancement and/or preservation credits at the Mojave River Watershed Mitigation Bank or other approved mitigation bank), or a combination of these options depending on availability. The proposed mitigation strategy shall prioritize in-kind and in-watershed options per the regulatory agencies' preferences. A minimum compensatory mitigation ratio of no less than 1:1 will be required; final mitigation ratios and	Prior to commencing ground- or vegetation-disturbing activities	Project Proponents

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	credits shall be determined by USACE, RWQCB, and CDFW based on agency evaluation of current resource functions and values and through each agency's respective permitting process."		
MM BIG BIO-32	Wildlife Crossings: As part of BIG construction, a wildlife crossing shall be constructed at the Unnamed Stream (Milepost 12.5) below the BNSF tracks and Main Street to facilitate wildlife movement between areas of natural habitat on either side of the railway and road. The railway crossing feature shall be placed alongside four smaller culverts constructed to convey water: three 36-inch and one 48-inch diameter culverts. The wildlife crossing shall be an 84-inch diameter culvert designed to facilitate passage beneath the rail right-of-way, which would connect open space east of the railway to the Mojave River, thereby maintaining access to existing linkages (i.e., the Rank 4/5 ACE, California Desert Linkage Network, and CEHC Potential Riparian Connection). Design features for facilitating wildlife culvert usage shall include installing inlet and outlet points. A long-term management plan for the wildlife crossing shall be submitted to the City for review and approval prior to start of vegetation removal and/or mass grading. The long-term management plan shall include: • Additional measures to encourage wildlife use include, but are not limited to, maintenance or restoration of native vegetation near, but not obstructing,	During Project Construction	Project Proponents

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	culvert mouths, and invasive plant removal. • Routine clearing of debris and trash from the culvert shall be completed on a quarterly basis and following large storm events to allow ample space is available for wildlife travel. • Access points to the culvert shall contain rocks or woody refuge sites to attract subterranean wildlife. Habitat quality (i.e., the percentage of invasive versus native plants and level of anthropogenic degradation) within a 200-meter radius surrounding the culvert access points shall be monitored quarterly by a qualified biologist to confirm wildlife corridor functionality. • A mitigation entity responsible for the implementation of the long-term management plan. • Exclusionary fencing shall be extended at least ½ to 1 mile along both sides of all Project-related rights-of-way, including rail and road medians, and should be designed to guide wildlife toward safe crossing structures. Without such measures, fencing may act as a barrier rather than a protective feature, increasing the risk of isolation and mortality.		
MM BIG BIO-34	Permanent Security Fencing: Prior to final construction design and upon securing a CESA ITP for CESA species, the designated biologist shall review and submit the fencing plans of the BIG Specific Plan Area to CDFW for review and consultation that are adjacent to natural habitats to confirm the fences provide a sufficient barrier to	Prior to commencing ground- or vegetation-disturbing activities	Project Proponents and Qualified Biologist

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	restrict wildlife from entering the BIG Specific Plan area. The permanent security fencing shall be enhanced with a barrier (e.g., fine-mesh fencing) that extends at least 12 inches below ground and 12 inches above ground to prevent special status reptile and mammal species, including desert tortoise, from moving through or underneath the fencing and gaining access to the BIG Specific Plan area. Where fencing is proposed between natural habitats and roadway right-of-way, at the 12-inch depth of the below-grade portion fence apron, the barrier shall extend or be bent at an approximately 90-degree angle and oriented outward from the roadway right-of-way a minimum of 12 inches to prevent fossorial (burrowing) mammals and reptiles from digging or tunneling below the security fence and gaining access to BIG. A climber barrier (e.g., rigid curved or bent overhang) shall be installed at the top of the apron to prevent reptiles and mammals from climbing over the apron. The designated biologists shall confirm that the selected apron material and climber barrier do not cause harm, injury, entanglement, or entrapment to wildlife species. Exclusionary fencing shall be extended at least ½ to 1 mile along both sides of all Project-related rights-of-way, including rail and road medians, and should be designed to guide wildlife toward safe crossing structures. Without such measures, fencing may act as a barrier rather than a protective feature, increasing the risk of isolation and mortality.		

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	The implementing entity shall provide quarterly inspection and repair of the fencing. The specific design and method for installation method of an apron or barrier may vary as required by regulatory permits issued under the FESA or CESA. Prior to start of operations then quarterly, biological monitors shall field-inspect the fencing that is adjacent to natural habitats and confirm appropriate installation and the implementing entity shall carry out repair of the fencing, as needed. Fencing plan review and field inspection shall be documented in a memorandum from the designated biologists and provided to CDFW and the City. In summary, CDFW recommends updating the final EIR to: • Accurately map and describe existing wildlife corridors and habitat linkages; • Evaluate the ecological function and hydrological performance of proposed crossings; • Implement directional fencing and median barriers to guide wildlife toward safe crossing structures and prevent access to hazardous infrastructure; • Analyze the spatial adequacy of crossing locations relative to known movement patterns informed by the wildlife movement study; • Incorporate exclusionary fencing that is combined with directional fencing to support wildlife movement; • Coordinate with CDFW and USFWS to ensure fencing and crossing designs align with species-specific needs and regional conservation goals.		

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MM BIO-37	Desert Native Plant Salvage Plan: Prior to start of construction mobilization activities, the implementing entity shall prepare a Desert Native Plant Salvage Plan for the removal of any plant species regulated under the CDNPA and County Code § 88.01.060, as well as any rare, sensitive, species of special concern, or other native plants identified by CDFW or CNPS. Adequate mitigation for CDNPA/County-protected and rare and sensitive plants may include the salvage of plants for translocation to a suitable recipient site if removal cannot be avoided. In the case of translocation, the Desert Native Plant Salvage Plan shall be prepared for review and approval by the City and CDFW. The plan shall include a description and map showing plants to be salvaged, salvage and transport methods, the proposed recipient site, and disposition of the plant specimens at the recipient site. Recipient sites may include existing conservation areas, botanical preserves, museums and zoological societies, among other conservation organizations that provide adequate habitat and management of desert native plants.	Prior to commencing ground- or vegetation-disturbing activities	Project Proponents
MM BIO-38	Arroyo Toad Pre-Construction Surveys: A qualified biologist(s) shall survey the Project site prior to commencement of Project activities according to the USFWS's Survey Protocol for the Arroyo Toad. If arroyo toads are found in the Project area and impacts are unavoidable, the Project Proponents shall not initiate Project activities at arroyo toad occupied locations and contact CDFW and the USFWS	Prior to commencing ground- or vegetation-disturbing activities	Project Proponents and Qualified Biologist

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	immediately within 24 hours to coordinate on appropriate avoidance and minimization measures to avoid impacts to arroyo toad. Unavoidable impacts to arroyo toad compensatory mitigation at a 3:1 mitigation ratio. Compensatory mitigation shall include permanent conservation of acquired lands through a conservation easement and an endowment to ensure management of the lands in perpetuity.		
MM BIG BIO-39	Crotch's Bumble Bee Avoidance: A habitat assessment and in accordance with the 2023 CDFW Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species (CDFW & Xerces Society, 2023) shall be conducted prior to commencement of Project activities to identify suitable habitat for Crotch's bumble bee. Within suitable habitat for Crotch's bumble, surveys should be conducted during the appropriate season when adult bees are active and floral resources are available in accordance with the 2023 CDFW Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species (CDFW & Xerces Society, 2023). If Crotch's bumble bee is detected during surveys or construction activities and complete avoidance is not feasible, CDFW strongly recommends that the Project Proponents obtain a CESA ITP from CDFW prior to commencing any vegetation or ground-disturbing activities. Any unauthorized Take of Crotch's bumble bee would constitute a violation of Fish and Game Code §2080.	Prior to commencing ground- or vegetation-disturbing activities	Project Proponents and Qualified Biologist

S8-88 cont'd

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MM BIG BIO-40	Western Joshua Tree Conservation Act Incidental Take Permit: Prior to the initiation of ground disturbing Project activities, if the Project may result in Take of western Joshua tree (*Yucca brevifolia*) (i.e., removal, trimming, relocation, severing of roots), the Project Proponents shall obtain an incidental take permit (ITP) through compliance with the Western Joshua Tree Conservation Act (Fish & G. Code, § 1927 et seq.) or through the California Endangered Species Act (Fish & G. Code, §§ 2080 & 2085).	Prior to commencing ground- or vegetation-disturbing activities	Project Proponents	
MM BIG BIO-41	Mohave Ground Squirrel Pre-Construction Surveys: Prior to commencement of ground disturbing Project activities, a visual survey shall be conducted by a qualified biologist during the period of March 15 through April 15 to determine presence of Mohave ground squirrel. The survey shall be conducted on the Project Site during daylight hours by the qualified biologist who can visually identify Mohave ground squirrel and white-tailed antelope squirrel and detect vocalization calls. If the survey or monitoring confirms presence, the Project Proponents shall contact CDFW immediately (within 24 hours) and fully avoid all impacts to Mohave ground squirrel or obtain an incidental take permit (ITP).	Prior to commencing ground- or vegetation-disturbing activities	Project Proponents and Qualified Biologist	S8-88 cont'd

RESPONSE TO COMMENT LETTER S8, CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE (CDFW)

The City acknowledges CDFW's role as a Responsible Agency and its ability to exercise its own judgment regarding the Final EIR's adequacy in accordance with State CEQA Guidelines § 15096(e). A discussion related to the CDFW's jurisdiction relevant to BIG is included in **Draft EIR Section 3.0: Project Description** and **Draft EIR Sections 5.1** through **5.17**, as appropriate. The anticipated CDFW approvals are listed in **Draft EIR Table 3-16: Proposed General Plan Permits and Approvals** (page 3-92) and **Table 3-17: BIG Permits and Approvals** (page 3-93). Per CEQA, a responsible agency should provide substantive comments, supported by specific documentation, regarding those project activities within an area of expertise of the agency or that are required to be carried out or approved by the agency. (Pub. Resources Code, § 21153(c).) Consistent with this, the City has carefully reviewed CDFW's comments on the Draft EIR and where necessary, revised the EIR accordingly, except as otherwise explained in the responses to comments below.

S8-1 Commenter raises some concerns about the Draft EIR's analysis that are best addressed by sharing technical and scientific information, which is provided below. This is introductory to the comments that follow. See also **Consolidated Response 04** concerning general non-CEQA issues.

S8-2 Comment noted. The City acknowledges CDFW's role as both a responsible and trustee agency.

S8-3 This is a summary of BIG's objectives and does not raise an environmental issue or a substantive issue on the content of the Draft EIR. See also **Consolidated Response 04** concerning general non-CEQA issues.

S8-4 This is a summary of BIG's location and timeline and does not raise an environmental issue or substantive issue on the content of the Draft EIR. See also **Consolidated Response 04** concerning general non-CEQA issues.

S8-5 The City acknowledges CDFW's comments provided as part of public comment for meetings conducted during the scoping process. The scoping period provided an opportunity for the City to hear from agencies, organizations and individuals about issues of interest to them for consideration in the Draft EIR. As noted **in Draft EIR Section 2.0: Introduction**, all comments received during the public comment period initiated with issuance of a Notice of Preparation (NOP) February 15, 2024 to March 26, 2024 (i.e., the "scoping period") were taken into consideration during preparation of the Draft EIR. In response to CDFW's March 2025 comments on the NOP, wildlife connectivity studies were conducted as described in the BIG Wildlife Movement Study, Attachment GG to the **Draft EIR Appendix 5.4 BIG-1 Biological Resources Technical Report**. The results are being utilized to inform culvert/wildlife crossing design development. Discussions regarding specifications that incorporate study results to create a functional wildlife crossing for target species based on study findings are on-going with CDFW and would address the comment's request that CDFW's input wildlife connectivity and culvert design be incorporated. Design specifics would continue to be reviewed with CDFW prior to finalization and would be held to a less than significant impact threshold under CEQA as required by revised **MM BIG BIO-32** (see **Response S8-66** below).

Regarding the comment's request for a comprehensive alternatives analysis, the Draft EIR analyzes a range of project alternatives as described in **Response S8-07** below, incorporated here by reference. See also **Consolidated Response 14** concerning consideration of a range of reasonable alternatives. As discussed in detail in **Draft EIR Appendix 5.4 BIG-1 Section 6.0**: **Impact Analysis**, the Draft EIR incorporates numerous and fully adequate mitigation measures to reduce impacts on Biological Resources to a less than significant level per CEQA legal requirements guidelines and precedent. However, CDFW's input on specific mitigation measures is appreciated, and several of the suggested revisions are incorporated as detailed in the responses to comments below.

S8-6 As described in **Draft EIR Appendix 5.4 BIG-1 Section 6.0: Impact Analysis** and **Section 8.0: Mitigation Measures**, Mojave fringe-toed lizard impacts are analyzed in detail and the following mitigation measures are proposed for construction best practices (**MM BIG BIO-1** through **MM BIG BIO 12**), seasonal work windows and species relocation out of the project work areas (**MM BIG BIO-23**), inclusion of an adjacent approximate 500 acre Mojave River Preserve which is occupied by the species, and additional habitat compensation to achieve a minimum preservation ratio equivalent to or greater than habitat impacts (**MM BIG BIO-24**), as well as long-term operations and maintenance minimization measures (raven management and adaptive weed control). Combined, these measures would adequately reduce potential impacts on the species to a less than significant level. **Draft EIR Appendix 5.4 BIG-1** adequately analyzes the potential impacts to Mojave fringe-toed lizard and proposes mitigation commensurate with precedent set for a California Species of Special Concern that is not listed as federally or state threatened or endangered (**MM BIG BIO-24**). Accordingly, adequate information has been disclosed regarding Mojave fringe-toe lizard impacts and mitigation, and revision and recirculation of the Draft EIR is not warranted. See the more detailed response to CDFW's comment 3 in **Responses S8-27** through **S8-37** below regarding Mojave fringe toe-lizard. The supplemental information provided in those responses clarifies and expands upon analyses included in the Draft EIR, and the conclusions of the Draft EIR remain valid. Also see **Consolidated Response 03** concerning recirculation of the Draft EIR.

S8-7 Comment noted. See **Responses S8-9** through **S8-88**.

S8-8 The Draft EIR analyzes a reasonable range of alternatives for the Project in compliance with CEQA, including, as required, a no project alternative. As a result, no recirculation is required. See also **Consolidated Response 03** concerning recirculation of the Draft EIR and **Consolidated Response 14** concerning consideration of a range of reasonable alternatives.

S8-9 Potential impacts to burrowing owl are identified in **Draft EIR Appendix 5.4 BIG-1 Section 6.0**: **Impact Analysis**. Their status as a CESA candidate and applicability of the CESA to the species, as well as CFGC take definitions, are disclosed in **Draft EIR Appendix 5.4 BIG-1 Section 5.0: Environmental Setting**, and **Section 3.0**: **Laws, Regulations, and Orders.**

S8-10 All potential project impacts to burrowing owl described in this comment are detailed in Draft **EIR Appendix 5.4 BIG-1 Section 6.0: Impact Analysis**. These impacts were considered, disclosed, and mitigation measures (**MM BIG BIO-21** and **MM BIG BIO-22**) developed

accordingly to avoid loss of individual owls and active nest sites (if present) as required by CEQA and CESA. Burrowing owls were observed wintering but not observed breeding on site as described in the **Draft EIR Appendix 5.4 BIG-1 Section 5.0: Environmental Setting**. Per **MM BIG BIO-21**, priority would be given to avoidance of individuals by project activities before implementation of relocation/translocation. Relocation/translocation of owls would only occur if avoidance is not feasible and after a CESA ITP is secured. As also described in **MM BIG BIO-21**, a relocation/translocation plan would be developed in consultation with CDFW and implemented in accordance with the CESA ITP that is being sought by the applicant. The CESA ITP being sought for burrowing owl is discussed further in **Response S8-11** below.

S8-11 A CESA ITP is being sought by the BIG Project proponent for burrowing owl. Application materials are in progress and BIG would not proceed until an ITP for the species has been issued by CDFW. **MM BIG BIO-21** as described in the Draft EIR is adequate to reduce impacts to burrowing owl to a less than significant level under CEQA thresholds and measures are designed to avoid the take of burrowing owl individuals and active nest sites. However, the City and BIG Project proponent recognizes that CESA standards differ and may require additional mitigation measures to meet the 'fully mitigated' standard. Accordingly, these additional conditions would be determined in consultation with CDFW as part of the CESA ITP process.

S8-12 The Draft EIR analysis recognizes that non-disturbance buffers for western burrowing owl vary dependent upon the type and location of project activities regardless of the season. **MM BIG BIO-21** sufficiently incorporates the CDFW guidance on non-disturbance buffers dependent on disturbance level by reference to CDFW's 2012 Staff Report on Burrowing Owl Mitigation. **MM BIG BIO-21** also requires biological monitoring of occupied burrows that are buffered and adjustments as needed to protect the owls at the discretion of the qualified Biological Monitor. Visual screening and other avoidance measures are also included in the 2012 Staff Report. As such, adjustment to buffer zones may also be feasible while still accomplishing avoidance per the 2012 Staff Report. Construction activities would substantially vary throughout BIG's duration, and not all project related activities would involve the heavy equipment required for initial habitat disturbance that would fall into the 'High' disturbance category as is noted in the comment. For example, project activities in the vicinity of a western burrowing owl burrow that involve periodic use of a temporary access route by small utility vehicles are not as disruptive as several weeks of clearing, grading, and grubbing with scrapers. The 2012 guidelines incorporate such flexibility by categorizing activity levels as low, medium, and high, the discretion of which would be overseen by a qualified Biological Monitor in coordination with CDFW. As such, defining a 'High' disturbance level to all project activities equivalently for buffer determination purposes as specified in this comment, would not be consistent with the intent of the guidelines or necessary to reduce potential impacts.

As discussed in **Responses S8-10** and **S8-11**, a CESA ITP from CDFW is being sought for BIG and burrowing owl relocation/translocation would not occur without a CESA ITP in place as is required by **MM BIG BIO-21** which states: If avoidance is not possible, either directly or indirectly, an ITP under CESA shall be obtained from CDFW and a Burrowing Owl Plan shall be prepared and submitted for approval by CDFW.

S8-13 CEQA requires that the lead agency incorporate mitigation for potentially significant impacts per significance criteria and impact thresholds. As part of the CESA ITP process, compensatory mitigation would be determined for take coverage of burrowing owl as is noted by CDFW in this comment. However, as stated in **Response S8-11** above, the 'fully mitigated' standard under CESA differs from CEQA significance criteria for reduction of impacts to a less than significant level. The lead agency has an obligation to establish its own mitigation requirements to reduce impacts under CEQA as specified by **MM BIG BIO-22** for burrowing owl. If the lead agency determined mitigation through a subsequent agency permitting process and did not establish a mitigation standard as part of the CEQA document, it could be considered deferral of mitigation requirements. Nonetheless, it is recognized that CDFW would review and approve the compensatory mitigation as part of the CESA ITP process and additional language to clarify this review and approval has been added to **MM BIG BIO-22** in **Response S8-17** below and to make clear that the ITP process would satisfy mitigation requirements under CEQA.

S8-14 It is noted and understood that there are not currently any Conservation Banks approved for burrowing owl or Mojave fringe-toes lizard credits and that CDFW does not accept in-lieu fee payments for species covered by an ITP. **MM BIG BIO-22** includes multiple compensatory mitigation options that are consistent with those outlined in this comment and CEQA precedent for burrowing owl mitigation. A variety of mitigation options allows for flexibility and they are meant to be refined as project approvals progress. As part of the ITP process, the BIG Project proponent is evaluating feasible options and pursuing a mitigation solution that would be approved by CDFW, i.e., habitat mitigation land acquisition and protection. Clarifications are made to **MM BIG BIO-22** in **Response S8-17** below, addressing the concerns raised by CDFW in these comments. The supplemental information provided in that response clarifies and expands upon analyses included in the Draft EIR, and the conclusions of the Draft EIR remain valid. Also see **Consolidated Response 03** concerning recirculation of the Draft EIR.

S8-15 As discussed in **Draft EIR Appendix 5.4 BIG-1 Section 6.0: Impact Analysis**, direct impacts to approximately 3,300 acres of suitable burrowing owl habitat are identified. The habitat impact analysis in the **Draft EIR Appendix 5.4 BIG-1** reads as follows: 'The removal of approximately 3,300 acres of suitable habitat would result in the loss of potential overwintering habitat for western burrowing owl; this includes all desert saltbush scrub, non-native grassland, dunes, creosote bush scrub, and the associated disturbed subtypes (and excludes developed, disturbed habitat, and tamarisk scrub). In these areas, suitable burrows and small mammal activity have been documented during multiple previous surveys.' This section further explains that compensatory mitigation would be provided at a minimum 1:1 ratio per **MM BIG BIO-22** to offset the impacts on burrowing owl habitat. According to **Draft EIR Appendix 5.4 BIG-1 Section 6.0: Impact Analysis**, the overall development footprint encompasses up to 4,390 acres (as opposed to 5,000 identified in this comment) and 973 acres of the overall footprint are developed and disturbed lands which would not be considered suitable habitat for burrowing owl.

S8-16 The EIR would be revised to adopt a number of CDFW's changes to **MM BIG BIO-21** that provide additional clarification. **MM BIG BIO-21** (pages 5.4-86 and 5.4-87) is revised in the **Final EIR Section 3.0: Errata to the Draft EIR**, as follows:

MM BIG BIO-21 Burrowing Owl Construction Requirements. No less than 14 days prior to the start of construction mobilization activities within suitable habitat, a qualified Species-Specific BM shall conduct pre-construction surveys for burrowing owl and/or occupied nest burrows within the limits of the BIG construction footprint plus a 500-foot buffer, according to the 2012 Staff Report on Burrowing Owl Mitigation.

Additionally, time lapses between BIG construction within suitable habitat shall trigger subsequent take avoidance surveys including but not limited to a final survey conducted within 24 hours prior to ground disturbance. The pre-construction surveys shall be repeated if there is a time lapse between construction activities of 14 days or more within previously surveyed areas. All surveys shall be conducted in accordance with the most current CDFW survey methods.

If burrowing owl or active burrows, or sign (e.g., molted feathers, cast pellets, prey remains, eggshell fragments, decoration, or excrement) are not observed during the pre-construction surveys, no additional conditions shall be required to avoid direct impacts on burrowing owl within the surveyed areas.

If burrowing owl is documented during pre-construction surveys, occupied burrowing owl burrows shall not be disturbed during the nesting season (February 1 through August 31) ~~unless an agency~~ and all impacts to burrowing owl shall be fully avoided until a CDFW approved Species-Specific BM verifies through non-invasive methods that either the birds have abandoned or failed nesting attempts, or that juveniles from the occupied burrows are foraging independently and capable of independent survival. A Species-Specific BM shall establish exclusion buffers to protect active nests in accordance with the recommendations included in CDFW's *Staff Report on Burrowing Owl Mitigation* (2012 or most recent version). A qualified Species-Specific BM shall conduct ongoing monitoring during construction activities.

If burrowing owl is observed during the non-breeding season (September 1 through January 31) or confirmed to not be nesting during pre-construction surveys, a non-disturbance buffer between construction activities and the occupied burrow shall be installed by a qualified Species-Specific BM in accordance with the recommendations included in the *Staff Report on Burrowing Owl Mitigation* (CDFW, 2012 or most recent version).

The implementing entity shall submit at least one burrowing owl pre-construction survey report for each surveyed area to the satisfaction of CDFW to document compliance with BIG's western burrowing owl MMs. Survey reports shall also be submitted to the City.

If full avoidance is not possible, either directly or indirectly, an ITP under CESA shall be obtained from CDFW and a Burrowing Owl Plan shall be prepared and submitted for review and approval by CDFW. The plan shall also be submitted to the City. Once approved by

CDFW, the plan shall be implemented in conjunction with the CESA ITP to relocate non-breeding burrowing owls from BIG. The plan shall detail methods for relocation of burrowing owls and provide guidance for the monitoring and management of the replacement burrow sites and associated reporting requirements. Details of the Burrowing Owl Plan shall be determined in consultation with CDFW, and is anticipated to include, but may not be limited to, the following:

- Proposed avoidance, and monitoring actions.
  - Number and location of occupied burrow sites, acres of burrowing owl habitat that would be impacted, details of site monitoring, and details on proposed buffers and other avoidance measures if avoidance is proposed.
  - Seasonal restrictions of relocation efforts - Relocation efforts shall occur during the non-breeding season (September 1 through January 31). Relocation during the breeding season (February 1 through August 31) may only occur if a qualified biologist determines that the bird have not begun egg-laying, or that the fledged juveniles are foraging independently and are capable of independent survival.
  - Climatic restrictions of relocation efforts - Relocation shall not occur ~~when~~ during extreme temperatures ~~exceed 95 degrees Fahrenheit~~ or that may cause mortality during rain or high wind.
  - Monitoring schedule and length - Full-time monitoring shall occur for at least two weeks following passive relocation and periodically thereafter or as required by the CESA ITP.

These changes to **MM BIG BIO-21** only clarifies the measure included in the Draft EIR, and the conclusions of the Draft EIR remain valid. Also see **Consolidated Response 03** concerning recirculation of the draft EIR.

The revision to "commencement of Project activities" instead of "construction mobilization activities" results in a broad nonspecific timing of the implementation of the measure. "Project activities" are not definitive in the Draft EIR, so the specification of “prior to construction mobilization activities” is more precise and appropriate. “Construction mobilization” is a more accurate description of the triggering activity for the mitigation measure to be implemented than a more vague “Project activities.” Accordingly, this CDFW recommended change has not been made to **MM BIG BIO-21** for burrowing owl.

Per **Response S8-12** above, BIG’s disturbance level would vary depending on the specific work activity and the characterization of all project activities as a ‘High’ disturbance level for buffer determination per the 2012 Staff Report is not included in the revisions to **MM BIG BIO-21**. Per the 2012 Staff Report and as already required by this MM, some project activities would be characterized as ‘High’ disturbance and non-disturbance buffers implemented accordingly.

S8-17 The EIR would be revised to adopt a number of CDFW’s changes to **MM BIG BIO-22** that provide additional clarification. **MM BIG BIO-22** (pages 5.4-87 and 5.4-88) is revised in the **Final EIR Section 3.0: Errata to the Draft EIR**, as follows:

MM BIG BIO-22: Prior to start of construction mobilization activities, the implementing entity shall prepare a Compensatory Mitigation Plan (CMP) in consultation with CDFW that describes the compensatory mitigation that shall be provided at a minimum 1:1 ratio to offset permanent and temporary impacts on burrowing owl habitat. The CMP shall describe the following:

- A description of burrowing owl and habitat types for which compensatory mitigation is being ~~provided~~ proposed.
- A description of the methods used to identify and evaluate mitigation options. Options may include one or more of the following:
  - Purchase of mitigation credits from a CDFW ~~an agency~~ approved mitigation bank ~~(e.g., Mojave Desert Tortoise Conservation Bank or other CDFW approved mitigation bank)~~.
  - Protection of burrowing owl habitat through ~~acquisition of fee title or~~ a conservation easement and funding for long-term management of the habitat. Endowment finds shall be transferred to the applicable agency or entity and conservation easements shall be held by an entity approved in writing by ~~the applicable regulatory agency~~ CDFW. ~~In circumstances where implementing entity protects habitat through a conservation easement, t~~ The terms of the conservation easement shall be subject to approval of ~~the applicable regulatory agencies~~ CDFW, and the conservation easement shall identify ~~applicable regulatory agencies~~ CDFW as third-party beneficiar~~ies~~y with a right of access to the easement areas.
  - ~~Payment to an existing in-lieu fee program.~~
- A summary of the estimated direct permanent and temporary Project impacts on burrowing owl and burrowing owl habitat.
- A description of the process that ~~shall~~ is proposed to be used to confirm Project impacts. Actual Project impacts on burrowing owl and burrowing habitat could differ from estimates. Should this occur, ~~adjustments shall be made to the proposed compensatory mitigation in consultation with CDFW~~ the Permittee shall be responsible for providing compensatory mitigation for final Project impacts.

  The burrowing owl CMP and mitigation requirements shall be submitted to the City and CDFW for review. If all or any portion of the acquired desert tortoise and/or Mojave fringe-toed lizard compensatory mitigation (**MM BIG BIO-16** and **MM BIG BIO-24**, respectively) or other required compensatory mitigation lands/credits meet the criteria for burrowing owl compensatory mitigation, it may be used to fulfill that portion of the obligation for burrowing owl compensatory mitigation requirements. Final compensatory mitigation for burrowing owl shall be determined in consultation with CDFW as a part of the CESA ITP review and approval process.

These changes to **MM BIG BIO-22** only clarifies the measure included in the Draft EIR, and the conclusions of the Draft EIR remain valid. Also see **Consolidated Response 03** concerning recirculation of the Draft EIR.

The revision to "commencement of Project activities" from "construction mobilization activities" results in a broad nonspecific timing of the implementation of the measure. "Project activities" are not definitive in the Draft EIR, so the specification of “prior to construction mobilization activities is more appropriate. Layering of mitigation values is an acceptable approach for permittee responsible compensatory mitigation as long as the lands meet the species-specific criteria identified. Accordingly, these CDFW recommended changes have not been made to **MM BIG BIO-22** for burrowing owl.

S8-18 Potential impacts to desert tortoise are identified in **Draft EIR Appendix 5.4 BIG-1 Section 6.0: Impact Analysis**. Their status under CESA and applicability of the CESA to the species as well as CFGC take definitions are disclosed in **Draft EIR Appendix 5.4 BIG-1 Section 5.0: Environmental Setting**, and **Section 3.0: Laws, Regulations, and Orders**, respectively.

Per **Response S8-24**, below; **MM BIG BIO-13** would be revised in **Final EIR Section 3.0: Errata to the Draft EIR** to clarify that exclusion fencing would be implemented "according to a CESA ITP and USFWS Biological Opinion". **MM BIG BIO-14** states that a CESA ITP would be acquired prior to such actions that involve the implementation of a translocation plan for desert tortoise; the translocation plan is to be reviewed and approved by USFWS and CDFW prior to implementation as described in this Draft EIR mitigation measure. **MM BIG BIO-16** requires preparation of a Compensatory Mitigation Plan in consultation with CDFW and USFWS to offset impacts on desert tortoise. These requirements are part of the process of securing a CESA ITP for desert tortoise for BIG. Take of desert tortoise would also be minimized and avoided through the use of agency approved Species-Specific BMs during exclusion fence installation. **MM BIG BIO-3** also details measures to avoid take of special status species (including desert tortoise) with the aid of agency-approved Species-Specific BMs and reads as follows: "*If the issue or concern involves special status species, work shall not resume until the species has left the work area, or until a DB implements the appropriate species-specific measures to avoid incidental take in coordination with USFWS and/or CDFW.*"

S8-19 The potential impacts/take of desert tortoise listed in the comment are fully disclosed in the appended **Draft EIR Appendix 5.4 BIG-1** and addressed by existing mitigation measures in the Draft EIR; see **Appendix 5.4 BIG-1 Section 6.0: Impact Analysis** and **Section 8.0: Mitigation Measures**. All desert tortoise occurring within the project site and impact footprint would be identified through protocol clearance surveys (pursuant to the USFWS Desert Tortoise Field Manual) as described in **MM BIG BIO-13**; the installation and maintenance of exclusion fencing prior to exclusion fence installation would further prevent additional impacts on desert tortoise individuals occurring outside of the project site by excluding them from the project site prior to the start of clearance surveys. Additionally, agency-approved BMs would be utilized during exclusion fence installation and other construction activities (including equipment and vehicle operation and staging activities) to further prevent additional take on desert tortoise per **MM BIG BIO-4**. Desert tortoise occurring with the impact footprint, as contained by exclusion fencing (**MM BIG BIO-13**), would be translocated off site per an agency-approved translocation plan as described in **MM BIG BIO-14** "in accordance with applicable Incidental Take Permits and Biological Opinions."

As described in **MM BIG BIO-2,** agency approved Designated Biologists oversee the implementation of all biological mitigation measures during construction as required by "CDFW/USFWS for permit validity". To prevent impacts on desert tortoise resulting from the operation of vehicles and construction equipment, **MM BIG BIO-4** requires that vehicles and equipment shall remain within project limits, as overseen by a BM, and that if a vehicle must operate outside of cleared construction limits, a Species-Specific BM shall confirm desert tortoise is absent from the area prior to use of the vehicle path. **MM BIG BIO-4** also requires that personnel shall check under stationary vehicles and equipment before operating and that work shall be halted until desert tortoise (if encountered) disperses on its own or an agency-approved Species-Specific BM moves the animal out of harm's way. Entrapment would be prevented through the implementation of **MM BIG BIO-9** which requires escape ramps for excavations, coverings and screenings for construction pipes, culverts, and similar structures, and inspections of structures prior to covering, filling, or resuming construction activities if previously inactive for more than 24 hours.

Predation avoidance would be prevented and/or minimized through the implementation of a Raven Management Plan as described in **MM BIG BIO-15**, which includes raven subsidy prevention, raven surveys, and participation in the interagency Raven Monitoring and Management Program to address indirect impacts to desert tortoise "related to the potential increase in the raven population" as a result of BIG.

S8-20 Noted, this comment does not provide comment on the specific biological resources analyses or mitigation measures discussed in the Draft EIR. See also **Consolidated Response 04** concerning general non-CEQA issues.

S8-21 **MM BIG BIO-13** as included in the Draft EIR specifies that a Species-Specific BM shall be present during fence installation, fence installation would occur in accordance with the USFWS's Desert Tortoise Field Manual, and additional clearance surveys would be conducted following the installation of desert tortoise exclusion fencing by agency-approved Species-Specific BMs. By referencing the USFWS 2009 Field Manual, **MM BIG BIO-13** incorporates thorough clearance survey protocols for all aspects of project disturbance including fence installation. A CESA ITP is being sought by the BIG Project proponent for desert tortoise. Application materials are in progress and BIG would not proceed with take of the species until an ITP has been issued by CDFW as required by state law. However, it is recognized that further clarification can be made to **MM BIG BIO-13** regarding timing of clearance surveys and requirements for a CESA ITP as recommended by this comment.

See **Response S8-24** for all revisions to **MM BIG BIO-13**. **MM BIG BIO-13** (page 5.4-74) would be revised in the **Final EIR Section 3.0: Errata to the Draft EIR** to include the following language:

> "Prior to commencement of construction mobilization activities, desert tortoise exclusion fencing shall be installed and maintained according to a CESA ITP and Biological Opinion to avoid take of desert tortoise including destruction of nests or their potential habitat in the impact footprint, where individuals are known to occur, recent sign has been observed, or

> construction activities have the potential to result in take. A qualified Species-Specific biological monitor shall first conduct a pre-construction survey for desert tortoise according to the CESA ITP and Biological Opinion at locations where exclusionary fence would be installed and translocate or relocate any desert tortoise present at exclusionary fence installation locations as required by the CESA ITP and Biological Opinion and only then exclusionary fencing shall be installed and the qualified Species-Specific biological monitor shall be present during exclusion fence installation..."

These changes to **MM BIG BIO-13** only clarifies the measure included in the Draft EIR, and the conclusions of the Draft EIR remain valid. Also see **Consolidated Response 03** concerning recirculation of the Draft EIR.

S8-22 Per **Response S8-21** above, the Draft EIR indicates that CESA take coverage is required for project activities that would affect desert tortoise, and a CESA ITP is being sought by the BIG Project proponent before proceeding in compliance with state law. See **Response S8-26**, below. To further clarify, **MM BIG BIO-16** would be revised to reflect the following: "Final compensatory mitigation shall be determined in consultation with CDFW and USFWS as a part of the CESA ITP and federal take authorization review and approval process". These changes to **MM BIG BIO-16** only clarifies the measure included in the Draft EIR, and the conclusions of the Draft EIR remain valid. Also see **Consolidated Response 03** concerning recirculation of the Draft EIR.

S8-23 This comment is acknowledged and is consistent with the biological resources analyses and mitigation measures discussed in the Draft EIR. See also **Consolidated Response 04** concerning general non-CEQA issues.

S8-24 The revision to "commencement of Project activities" from "construction mobilization activities" results in a broad nonspecific timing of the implementation of the measure. "Project activities" are not definitive in the Draft EIR; specifying that the fence installation would occur before construction mobilization activities identifies the activity for which take could result, which warrants the installation of exclusion fence per the CESA ITP and Biological Opinion and therefore is preferable language.

Although the CESA ITP and Biological Opinion may include guidance regarding shade structures and predation protection, these documents cannot provide in field discretion that would be based on site specific characteristics. Incorporation of shade structures along exclusion fencing may require in field interpretation and judgment and therefore should be left to the discretion of a designated biologist that would be approved by the agencies per **MM BIG BIO-2**. Qualified agency-approved Species-Specific BMs would monitor exclusion fence installation as detailed in the measure to prevent take of desert tortoise; monitoring activities would be overseen by the designated biologist per **MM BIG BIO-2** who would have adequate experience to make discretionary decisions regarding shade and/or predation protection.

The EIR would be revised to adopt CDFW's other recommended changes to **MM BIG BIO-13** to provide additional clarification. **MM BIG BIO-13** (pages 5.4-74 and 5.4-75) is revised in the **Final EIR Section 3.0: Errata to the Draft EIR**, as follows:

MM BIG BIO-13: Desert Tortoise Clearance Surveys. "Prior to commencement of construction mobilization activities, desert tortoise exclusion fencing shall be installed and maintained according to a CESA ITP and Biological Opinion to avoid take of desert tortoise, including destruction of nests or their potential habitat in the impact footprint, where individuals are known to occur, recent sign has been observed, or construction activities have the potential to result in take. A qualified Species-Specific biological monitor shall first conduct a pre-construction survey for desert tortoise according to the CESA ITP and Biological Opinion at the locations where exclusionary fencing would be installed and translocate or relocate any desert tortoise present at exclusionary fence installation locations as required by the CESA ITP and Biological Opinion and only then the exclusionary fencing shall be installed and the qualified Species-Specific biological monitor shall be present during exclusion fence installation. Desert tortoise exclusion fencing in desert tortoise habitat shall be constructed to standards outlined in Chapter 8 of the Desert Tortoise (Mojave Population) Field Manual (Gopherus agassizii) (USFWS, 2009b) and shall be used to delineate the area. The desert tortoise exclusion fencing shall be maintained and monitored daily during the desert tortoise activity period (i.e., early March through early June and September through early November) to allow for fencing to be maintained in good condition, and to determine if tortoises are "trapped" along the fencing searching for a way to access the other side. Outside of the desert tortoise activity period, fence inspections shall occur at least once weekly by a qualified Species-Specific biological monitor. If failures in the exclusion fence are documented, desert tortoise clearance surveys shall be repeated for affected areas. At the discretion of the designated biologist, desert tortoise exclusion fencing design shall incorporate areas of shade and/or predation protection (e.g., artificial burrows) in the event a desert tortoise becomes trapped along the fence. Desert tortoise guards, or other agency approved design, shall be installed and connected to the exclusionary fencing at construction area entry points to prohibit desert tortoise from crossing into the construction right-of-way. The desert tortoise guard shall have a clear escape route away from construction activity for any desert tortoise that should fall into the guard. The guard shall be inspected daily by a qualified biological monitor for desert tortoise and to ensure the escape route is free of obstruction and debris.

Immediately following the installation of desert tortoise exclusion fencing, Species-Specific biological monitors ~~the agencies~~ and/or designated biologists approved by USFWS in accordance with the Desert Tortoise Authorized Biologist Qualifications Form (Section 3.2) of the Desert Tortoise (Mojave Population) Field Manual (Gopherus agassizii) (USFWS, 2009b) and CDFW shall conduct clearance surveys in suitable habitat for desert tortoise. The survey(s) shall be conducted in general accordance with Chapter 6 of the Desert Tortoise (Mojave Population) Field Manual (Gopherus agassizii) (USFWS, 2009) or current clearance survey protocol and shall align with requirements in the CESA ITP and Biological Opinion. ~~The survey(s) may be conducted any time of year, but preferably during the desert~~

~~tortoise active period (i.e., early March through early June, and September through early November).~~ Survey results shall be provided to the City, CDFW, and USFWS.

If active desert tortoise burrows are identified in the impact footprint during desert tortoise clearance surveys and required to be moved off site, a desert tortoise translocation plan would be implemented as approved by USFWS and CDFW. All unoccupied desert tortoise pallets and burrows that are not practical to avoid shall be examined and excavated by hand during the clearance survey by the qualified Species Specific biological monitors and collapsed to prevent reentry following the procedures and precautions outlined in the Desert Tortoise (Mojave Population) Field Manual (Gopherus agassizii) (USFWS, 2009b), CESA ITP, and Biological Opinion."

These changes to **MM BIG BIO-13** only clarifies the measure included in the Draft EIR, and the conclusions of the Draft EIR remain valid. Also see **Consolidated Response 03** concerning recirculation of the Draft EIR.

S8-25 The revision to "commencement of Project activities" instead of "construction mobilization activities" results in a broad nonspecific timing of the implementation of the measure. "Project activities" are not definitive in the Draft EIR, thus, the language "prior to construction mobilization activities" in this mitigation measure is more precise and appropriate. Accordingly, reviewing and approving the translocation prior to "project activities" does not provide a clear understanding of the timing of plan review and approval. The timing of the preparation of the translocation plan prior to construction mobilization is adequate to avoid unauthorized take of the species and is therefore preferable language; however, **MM BIG BIO-14** would be updated to include the 30-day requirement for review and approval prior to translocation. **MM BIG BIO-14 (pages 5.4-75 and 5.4-76)** is revised in the **Final EIR Section 3.0: Errata to the Draft EIR**, as follows:

MM BIG BIO-14 Desert Tortoise Relocation and Translocation. Prior to start of construction mobilization activities, a designated biologist approved by CDFW through a CESA ITP and USFWS through a Biological Opinion shall prepare a BIG-specific Desert Tortoise Translocation Plan, based on the Translocation of Mojave Desert Tortoises from Project Sites: Plan Development Guidance (USFWS, 2020), Health Assessment Procedures for the Mojave Desert Tortoise (Gopherus agassizii): A Handbook Pertinent to Translocation (USFWS, 2016) and Desert Tortoise (Mojave Population) Field Manual (Gopherus agassizii) (USFWS, 2009b) or other current USFWS guidelines and in accordance with applicable Incidental Take Permits and Biological Opinions. The BIG-specific Desert Tortoise Translocation Plan shall identify suitable relocation and translocation sites, provide details on desert tortoise surveys and for moving desert tortoise out of harm's way, and include the methodology for visual desert tortoise body condition assessments. ~~A~~ The designated biologist shall provide the BIG-specific Desert Tortoise Translocation Plan to the USFWS and CDFW for review and approval at least 30 days prior to start of translocation. At a minimum, the Desert Tortoise Translocation Plan shall include the following measures:

- The qualified Species-Specific biological monitor or the designated biologist shall implement the Desert Tortoise Translocation Plan during BIG construction. Only qualified Species-Specific biological monitors or designated biologists authorized by the USFWS and CDFW to handle desert tortoise shall move the animal and project-specific ITPs for desert tortoise shall be acquired under CESA and FESA prior to such actions.
- The approved Species-Specific biological monitor or designated biologist shall move the desert tortoise found in construction work areas out of danger outside of the potential impact footprint, following the procedures and conditions outlined in the Incidental Take Permit and Biological Opinion.
- Prior to the approved Species-Specific biological monitor or designated biologist moving desert tortoise out of the construction work area, the biological monitor or designated biologist shall survey the relocation and translocation site to confirm that suitable burrows for desert tortoise exist. If few or no burrows are available, artificial burrows and/or shade structures shall be created along the outer perimeter of the desert tortoise exclusion fencing following the guidelines in the Desert Tortoise (Mojave Population) Field Manual (Gopherus agassizii) (USFWS 2009b) and Shade Structures for Desert Tortoise Exclusion Fence: Design Guidance (USFWS 2018), or as updated or replaced by the USFWS and in accordance with the CESA ITP and Biological Opinion.
- If needed, artificial burrows shall be installed outside of the construction work area (along the outer perimeter of the desert tortoise exclusion fencing if applicable) from where the individual was relocated to provide cover and prevent exposure to predators and dehydration. Prior to excavation of an occupied burrow, artificial burrows shall be installed."

These changes to **MM BIG BIO-14** only clarifies the measure included in the Draft EIR, and the conclusions of the Draft EIR remain valid. Also see **Consolidated Response 03** concerning recirculation of the Draft EIR.

S8-26 The revision to "commencement of Project activities" instead of "construction mobilization activities" results in a broad nonspecific timing of the implementation of the measure. "Project activities" are not definitive in the Draft EIR, so the language "prior to construction mobilization activities" in this mitigation measure is more precise and appropriate.

The compensatory mitigation plan, with details as described in **MM BIG BIO-16**, is not necessarily required for submittal of the ITP application, although a general discussion of the compensatory mitigation strategy and its adequacy would be included in the ITP application and compliance with the ITP would require review and approval of a compensatory mitigation plan for desert tortoise. To more accurately reflect the process of determining compensatory mitigation requirements between the agencies and the BIG Project proponent, this mitigation measure describes that compensatory mitigation would be determined in consultation with CDFW and USFWS as opposed to deferring the process to conditions included in the CESA ITP. CEQA requires that the lead agency incorporate mitigation for potentially significant impacts

per significance criteria and impact thresholds. As part of the CESA ITP process, compensatory mitigation would be determined for take coverage of desert tortoise as is implied by CDFW in these recommended revisions. The lead agency has an obligation to establish mitigation requirements to reduce impacts under CEQA as specified by **MM BIG BIO-16** for desert tortoise. If the lead agency determined mitigation through a subsequent agency permitting process and did not establish a mitigation standard as part of the CEQA document, it could be considered deferral of mitigation requirements. However, it is recognized that CDFW would review and approve the compensatory mitigation as part of the CESA ITP process and additional language to clarify this review and approval has been added to **MM BIG BIO-16** in **Response S8-26** below.

The addition of the sentence "CDFW shall describe in the CESA ITP the process for satisfying compensatory mitigation" is implicit and not necessary to add to the mitigation measure for the purposes of CEQA.

All other CDFW recommended revisions to **MM BIG BIO-16** are acceptable for additional clarification. **MM BIG BIO-**16 (pages 5.4-77 through 5.4-79) is revised in the **Final EIR Section 3.0: Errata to the Draft EIR**, as follows:

MM BIG BIO-16 Desert Tortoise Compensatory Mitigation Plan. "Prior to start of construction mobilization activities, the implementing entity shall prepare a Compensatory Mitigation Plan (CMP) in consultation with CDFW and USFWS that describes the compensatory mitigation that shall be provided at a minimum 1:1 ratio to offset permanent and temporary impacts on desert tortoise habitat. The CMP shall describe the following:

- A description of desert tortoise and habitat types for which compensatory mitigation is being ~~provided~~ proposed.
- A description of the methods used to identify and evaluate mitigation options.

  Options may include one or more of the following:

  - Purchase of mitigation credits from an agency-approved mitigation bank
  - (e.g., Mojave Desert Tortoise Conservation Bank or other CDFW/USFWS approved mitigation bank).
  - Incidental take permit coverage through an existing agency general conservation plan (e.g., USFWS Desert Tortoise General Conservation Plan).
  - Protection of desert tortoise habitat through acquisition ~~of fee title or~~ and a conservation easement and funding for long-term management of the habitat. Endowment funds shall be transferred to the applicable agency or entity approved by CDFW and USFWS and the conservation easements shall be held by an entity approved in writing by the applicable regulatory agency**;** for example, CDFW and USFWS. In circumstances where BNSF protects habitat through a conservation easement, the terms of the conservation easement shall be subject to approval of the applicable regulatory agencies, such as CDFW and USFWS and the conservation easement shall identify applicable regulatory agencies as third-party beneficiaries with a right of access to the easement areas.

- ~~Payment to an existing in-lieu fee program.~~

- A summary of the estimated direct permanent and temporary impacts on desert tortoise and desert tortoise habitat.
- A description of the process that is proposed to be used to confirm impacts. Actual impacts on desert tortoise and desert tortoise habitat could differ from estimates. Should this occur, adjustments shall be made to the proposed compensatory mitigation in consultation with CDFW/USFWS.
- ~~Adjustments to impact estimates and compensatory mitigation shall occur in the following circumstances:~~
  - ~~Impacts on desert tortoise (typically measured as habitat loss) are reduced or increased as a result of changes in BIG design;~~
  - ~~Pre-construction site assessments indicate that desert tortoise habitat features are absent (e.g., because of errors in land cover mapping or land cover conversion);~~
  - ~~The desert tortoise habitat is determined to be unoccupied based on negative species surveys; or~~
  - ~~Impacts initially categorized as permanent qualify as temporary impacts.~~
  - ~~An overview of the strategy for mitigating effects on desert tortoise. The overview shall include the ratios to be applied to determine mitigation levels and the resulting mitigation totals.~~
  - ~~A description of habitat restoration or enhancement Projects, if any, that would contribute to compensatory mitigation commitments.~~
  - ~~A description of the success criteria that shall be used to evaluate the performance of habitat restoration or enhancement Projects, and a description of the types of monitoring that shall be used to verify that such criteria have been met.~~
  - ~~A description of the management actions that shall be used to maintain the habitat on the mitigation sites, and the funding mechanisms for long-term management, if applicable.~~
  - ~~A description of adaptive management approaches, if applicable, that shall be used in the management of species habitat.~~
  - ~~A description of financial assurances that shall be provided to demonstrate that the funding to implement mitigation is assured.~~

Final compensatory mitigation shall be determined in consultation with CDFW and USFWS as a part of the CESA ITP and federal take authorization review and approval process. The CMP shall be submitted to the City, CDFW, and USFWS."

These changes to **MM BIG BIO-16** only clarifies the measure included in the Draft EIR, and the conclusions of the Draft EIR remain valid. Also see **Consolidated Response 03** concerning recirculation of the Draft EIR.

S8-27 Impacts on Mojave fringe-toed lizard, a state Species of Special Concern, are discussed in **Draft EIR Appendix 5.4 BIG-1 Section 6.0: Impact Analysis** and **Section 8.0: Mitigation Measures**. These sections also address dune habitats as sensitive natural communities. A thorough analysis of impacts is included, and development of a comprehensive habitat mitigation plan is required by the Draft EIR for unavoidable impacts to the species. Impacts discussed in **Draft EIR Appendix 5.4 BIG-1 Section 6.0: Impact Analysis** include harassment, injury of mortality during construction, the removal of 1,009 acres of dune habitat of varying qualities, as well as indirect impacts associated with habitat fragmentation, reduced gene flow, disruptions from noise, vibration, and dust, and increased predation. To mitigate the potentially significant impacts, both **Draft EIR Appendix 5.4 BIG-1 Section 6.0: Impact Analysis** and **Section 8.0: Mitigation Measures** discuss the mitigation measures for these impacts, and how they would avoid, minimize, and mitigate for impacts on Mojave fringe-toed lizard to a less than significant level. The measures include limiting construction during the active season where there is greater ability for dispersal, to the greatest extent feasible (**MM BIG BIO-23**), the presence of biological monitors during the removal of suitable Mojave fringe-toed lizard habitat (**MM BIG BIO-23**), and the implementation of construction best management practices (**MM BIG BIO 1-4**).

Although BIG would result in the removal of 1,009 acres of suitable habitat, not all of the impacted Mojave fringe-toed habitat is considered to be of high quality. Approximately 552 acres are considered high quality, while approximately 7 acres are considered moderate quality and 451 are considered to be low quality due to the substantial presence of non-native vegetation, level of human disturbance, and partially stabilized to stabilized nature of the sand (**Draft EIR Appendix 5.4 BIG-1** page 142.) It should also be noted that the Draft EIR identifies a 500-acre area of dune habitat adjacent to the Mojave River that would be placed in a Conservation Easement to offset BIG impacts on dune habitat.

Per **MM BIG BIO-24**, compensatory mitigation is to be obtained to offset direct impacts on suitable Mojave fringe-toed lizard habitat and would be of equal or greater value than the habitat to be affected on site. Because mitigation bank credits do not currently exist for Mojave fringe-toed lizard, compensatory mitigation must be pursued through land acquisition, conservation, and long-term management of in-kind habitat. **MM BIG BIO-24** requires that the mitigation lands include deposits of aeolian or fine windblow sand, are occupied by the species or have connectivity to occupied lands, and not characterized as highly disturbed. **MM BIG BIO-28** requires compensatory mitigation for dune habitat impacts at a minimum 1:1 ratio given its ranking as a sensitive natural community and the habitat it provides to dune dependent species. Mojave fringe-toed lizard is considered a California Species of Special Concern and impacts to such species require assessment under CEQA. Species of special concern are not afforded the same legal protection and mitigation standards as species listed under the federal or state endangered species acts. A minimum 1:1 mitigation ratio is consistent with CEQA precedent for reducing impacts to a non-listed species of special concern and associated habitat. As discussed above and in **Draft EIR Appendix 5.4 BIG-1** on page 142, habitat is of varying qualities and only 552 acres are considered highly suitable for the species. Nonetheless, to address the concerns raised by CDFW regarding sensitivity of the

species and its habitat, **MM BIG BIO-24** would be updated to include a minimum 2:1 ratio from a 1:1 ratio, and despite the varying qualities of impacted habitat for the state Species of Special Concern that would equate to the protection of over 2,000 acres of suitable dune habitats for Mojave fringe-toed lizard. As required by **MM BIG BIO-24,** final compensatory mitigation for Mojave fringe-toed lizard would be determined in coordination with CDFW.

These changes to **MM BIG BIO-24** clarifies and strengthens the measure included in the Draft EIR, and the conclusions of the Draft EIR remain valid. Also see **Consolidated Response 03** concerning recirculation of the Draft EIR.

S8-28 The Draft EIR acknowledges the identification of the Barstow/Camp Cody linkage, which is an important sand transport corridor, as discussed in **Draft EIR Appendix 5.4 BIG-1 Section 5.0**: **Environmental Setting**. Although the removal of approximately 1,000 acres of dune habitat may affect a small segment, less than 5 miles in length, of the sand transport system, the extent of the potential disruption is not conclusive for the entire 79-mile stretch Barstow/Camp Cody linkage since the formation of dunes is dependent on the unpredictable dynamic aeolian sand transport system. The Muhs and Holliday 1995 reference provided in this comment is not specific enough to the project area to allow for conclusion that there would be a significant impact on the sand transport system and linkage. Additionally, the corridor would not be cut off or blocked by BIG as the BIG footprint is situated southeast of the Mojave River, avoiding the actual river corridor entirely and preserving the avoided 500 acres of dune habitat in a Conservation Easement. This would allow the area to contribute to maintenance of the Mojave River sand transport system in perpetuity. A detailed analysis of potential dune habitat impacts is discussed in **Draft EIR Appendix 5.4 BIG-1 Section 6.0: Impact Analysis.** and discloses impacts such as the removal of sensitive dune habitat during construct and indirect impacts on adjacent native vegetation communities during construction and operations. Impacts on habitat for Mojave fringe-toed lizard are also discussed at length in **Draft EIR Appendix 5.4 BIG-1 Section 6.0 Impact Analysis**. Additionally, see **Response S8-27** for more detail regarding impacts to Mojave fringe-toed lizard habitat.

The Draft EIR acknowledges that the population of Mojave fringe-toed lizard within the BIG footprint could be a part of a unique subpopulation of the species. Murphy et al. (2006) as cited in this comment identifies two major genetic lineages of Mojave fringe-toed lizards associated with the development of river drainage systems, a northern lineage in connection with the Amargosa River and a southern lineage including the Mojave River basin, Bristol Trough, Clark's Pass, and Colorado River Systems. Further, the Murphy et al. 2006 study concludes that the southern populations (which include BIG) exhibit little local genetic differentiation.

Harassment, injury, harm, and mortality of Mojave fringe-toed would be avoided and minimized through the implementation of **MM BIG BIO-23**, which requires that a Species-Specific BM be present for the removal and disturbance of the species' habitat to prevent direct impacts during construction through biological monitoring and relocation. This measure to prevent Mojave fringe-toed mortality during construction would allow for the species to persist within the vicinity. Additionally, the preservation of more than 500 acres of dune

habitat adjacent to the BIG impact area would be put into a conservation easement which would continue to support the species occurring within/around BIG following project construction, allowing the sensitive subpopulation to persist and continue to provide valuable sand transport functions for the area and entire Mojave River system.

S8-29 This comment restates the analysis of **Draft EIR Appendix 5.4 Section 6.0: Impact Analysis,** this comment is consistent with the biological resources analyses discussed in the Draft EIR. No further response is required.

S8-30 One purpose of the response to comments process is to clarify any confusion regarding the Draft EIR and its analysis. Here, the commenter states that the Draft EIR did not adequately address impacts associated with the removal of two-thirds of dune habitat for the Mojave fringe-toed lizard subpopulation. This response clarifies that the referenced two-thirds estimate only refers to the proportion of suitable habitat within the BIG footprint, as evaluated in the Draft EIR and its supporting technical studies, not two-thirds of the subpopulation's overall known distribution range.

This comment is focused on the amount of dune habitat for the Mojave fringe-toed lizard subpopulation that would be affected by BIG, stating that there is no evidence that the removal of two-thirds of dune habitat for the subpopulation of Mojave fringe-toed lizard would not have a significant impact and recommends revising the analysis. However, the two-thirds estimate relates only to the habitat within the BIG footprint: specifically, of the total acreage of habitat within the BIG footprint, two-thirds would be affected by BIG. The EIR, including the appendix, does not conclude that two-thirds of the total acreage of all habitat for the entire subpopulation of the subspecies would be affected by BIG. With respect to the size of the entire known distribution range for the entire subpopulation, the comment does not identify the total acreage of Mojave fringe-toed lizard habitat for the subpopulation as a whole, nor is the extent of the subpopulation defined in the comment. Based on the California Wildlife Habitat Relations Mojave Fringe-Toed Lizard Predicted Habitat Map, the BIG site lies within the center of the western part of the species range; see https://gis.data.ca.gov/maps/CDFW::mojave-fringe-toed-lizard-predicted-habitat-cwhr-r015-ds2396/explore?location=34.742214%2C-116.975234%2C8. As described in **Response S8-28** above, the Mojave River basin is part of the southern genetic lineage of Mojave fringe-toed lizards which extends south over 150 miles to the Colorado River system. Accordingly, this covers a much larger geographic range than is implied by the comment. **Draft EIR Appendix 5.4 BIG-1 Section 6.0: Impact Analysis** acknowledges that although BIG would affect 1,000 acres of dune habitat only half of that is considered high quality and on top of the adjacent 500+ acres of suitable occupied habitat that would avoided and preserved as a result of BIG, additional suitable habitat encompassing hundreds of acres exists to the immediate north, northeast, and southwest of the BIG boundary that would not be impacted and would allow for the movement of the species into connected areas of suitable habitat. These adjacent areas are presumed occupied by the species based on proximity and habitat quality although a census is not reflected in **Draft EIR Appendix 5.4 BIG-1 Figure 5.1-7: Mojave Fringe-Toed Lizard Impact** as these areas lie outside of the BIG study area. Additionally, the 500+ acres of suitable habitat occurring outside of BIG impacts within the

BIG boundary would be placed within a conservation easement as a part of the Mojave Basin Preserve; a long-term management plan would be required and implemented on this area as a part of the Habitat Mitigation Land Acquisition Proposal for BIG to maintain the existing quality of dune habitat and suitability for Mojave fringe-toed lizard in perpetuity per **MM BIG BIO-24** as included in the Draft EIR. Accordingly, the Draft EIR's analysis of potential impacts to dune habitat for the subpopulation of Mojave fringe-toed lizard was accurate and does not require revisions to address the issues in the comment.

S8-31 Although considered an SSC by CDFW requiring consideration of impacts under CEQA, the Mojave fringe-toed lizard is not listed as a threatened or endangered species under the federal or state endangered species acts, nor is it a candidate for listing. This comment indicates that it is vulnerable to extinction. This is acknowledged that could be the case in the future; however, CEQA requires analysis of current conditions, and its current regulatory classification is at a 'sensitive' but not imperiled level. If the vulnerability to extinction were more imminent, it is expected that the species would be a candidate for protection under CESA. Additionally, an SSC designation does not constitute a formally protected status under federal or state law. The potential impact of removing approximately 1,000 acres of suitable habitat is discussed in detail in **Draft EIR Appendix 5.4 BIG-1 Section 6.0: Impact Analysis**. See **Response S8-28** and **S8-30** above regarding the impact analysis details and the lack of genetic diversity among subpopulations of the southern lineage of the species. Cumulative impacts as a result of BIG are discussed in **Draft EIR Appendix 5.4 BIG-1 Section 7.0: Cumulative Impacts**; this discussion substantiates how BIG would not result in significant cumulative impacts given the substantial habitat mitigation to be provided by BIG as required by the Draft EIR.

S8-32 Dune habitat is not the primary burrowing habitat for species like burrowing owl and desert tortoise; however, the species occurs and/or has potential to occur in habitat that is also suitable for Mojave fringe-toed lizard. As depicted on **Draft EIR Appendix 5.4 BIG-1 Figure 5.1-6: Western Burrowing Owl Impacts** and **Attachment GG Figure 4F**, and as discussed in **Appendix 5.4 BIG-1 Section 5.0: Environmental Setting**, burrowing owl was documented in dune habitat in 2021-2022, and 2025. Desert tortoise also has potential to wander through BIG's dune vegetation communities, albeit at a low potential due to substrates not preferred by the species (see **Draft EIR Appendix 5.4 BIG-1 Section 6.0: Impact Analysis**. Therefore, dune habitat on BIG is considered suitable for both burrowing owl and desert tortoise and requires compensatory mitigation. Due to the co-occurrence and potential co-occurrence of Mojave fringe-toed lizard with burrowing owl and desert tortoise on dune habitat within BIG, it is appropriate to nest compensatory mitigation between the three species as long as the suitability criteria required by individual compensatory habitat requirements as listed in **MM BIG BIO-16**, **MM BIG BIO-22**, and **MM BIG BIO-24** are met for each species. This would naturally result in more lands being acquired as full overlap of all habitat mitigation criteria is not likely feasible. As stated in each of these measures, final compensatory mitigation lands would be approved by CDFW.

S8-33 The comment appears to be based on the assumption that approximately two-thirds of the active sand dune systems with the subpopulation's known distribution range would be removed by BIG. However, as clarified in **Response S8-30** above, BIG would affect approximately two-thirds of the habitat within the BIG boundary, not the known distribution range of the subpopulation. The known distribution range extends for 25-75 miles beyond the BIG footprint in all directions (California State Geo Portal Mojave Fringe-Toed Lizard Range - CWHR R015 [ds1723]), and additional suitable habitat occurs outside of the BIG footprint to the north, northeast, and southwest (See **Draft EIR Appendix 5.4 BIG-1 Section 6.0: Impact Analysis.** BIG would not result in the removal of two-thirds of the subpopulation's known distribution range, therefore, the comment is not based on substantial evidence and the analysis and conclusion in the Draft EIR remain accurate and valid. See **Response S8-28, S8-30**, and **S8-31** concerning additional details in response to this comment.

S8-34 The comment notes that 1,000.9 acres of dune habitat would be preserved; however, this figure does not fully reflect the extent of preserved dune habitat. **MM BIG BIO-24** requires a *minimum* 1:1 replacement ratio with the final compensatory habitat mitigation determined in coordination with CDFW. Approximately 545 acres of dune habitat would be preserved as a part of BIG's compensatory mitigation strategy; this land occurs adjacent to the impact footprint southeast of the Mojave River and supports the local subpopulation of Mojave fringe-toed lizard as described in **Draft EIR Appendix 5.4 BIG-1 Section 5.0: Environmental Setting** and **Draft EIR Figure 5.1-7**. **Draft Appendix 5.4 BIG-1 Section 6.0: Impact Analysis** also discusses the ability of Mojave fringe-toed lizard to move into large blocks of connected suitable habitat to the north, northeast, and southwest of the BIG site and BIG boundary, which would support their persistence in BIG's vicinity, resulting in a reduction of impacts below a significant level. As a part of the Habitat Mitigation Lands Acquisition Proposal process and per **MM BIG BIO-24**, lands proposed for Mojave fringe-toed lizard and dune habitat mitigation would have to demonstrate adequacy for project impacts to garner approval by CDFW, including the dune lands adjacent to the BIG impact area within the project boundary. As a part of the Habitat Mitigation Lands Acquisition Proposal and per the mitigation measures established in the Draft EIR, location of the mitigation parcels to be placed into a conservation easement as well as demonstrating the habitat they contain is adequate to mitigate for project species/habitat impacts would be required as part of the agency approval process. Accordingly, the conclusions of the Draft EIR remain valid, and no new or more severe impacts have been identified requiring recirculation pursuant to State CEQA Guidelines § 15088.5. Also see **Consolidated Response 03** concerning recirculation of the Draft EIR.

S8-35 The impacts on 1,009 acres of Mojave fringe-toed lizard habitat are thoroughly analyzed in **Draft EIR Appendix 5.4 BIG-1 Section 6.0: Impact Analysis**. This section also explains how project mitigation measures would address potential impacts during construction and operation so that impacts would be reduced to a less than significant level. See **Response S8-27** through **S8-34** which provide further response to CDFW's concerns regarding the Draft EIR's impact analysis for the 1,009 acres of dune habitat to be affected by BIG.

S8-36 The comment's claim that "the ratio of permanent conservation to loss must, in most cases exceed 1:1 for any species (i.e., 3:1), particularly for Mojave fringe-toed lizard who occupies an irreplaceable and rare habitat" does not differentiate between impacts to threatened and endangered species, which must be "fully mitigated" under CESA, and impacts to other species analyzed under CEQA. Commenter does not identify any authority for imposing a ratio higher than 1:1 for the Mojave fringe-toed lizard, which is a Species of Special Concern and not defined as 'endangered, threatened, or rare' under CEQA, holding that "rare" under CEQA required specific showing of likelihood extinction and other factors). [49] CDFW may require a 3:1 mitigation ratio for species listed under CESA and for which an incidental take permit is required to "fully mitigate" the take of threatened or endangered species. (Fish & G. Code, § 2081, subd. (b)(2)). . However, the Mojave fringe-toed lizard is not subject to CESA and thus mitigation requirements are not as substantial as that for a CESA listed species. Nonetheless, the Draft EIR recognizes the sensitivity of the species, level of project impact, and prescribes a mitigation ratio via **MM BIG BIO-24** that is commensurate with CEQA precedent for a California species of special concern that may experience a local population level impact. Compensatory mitigation ratios are determined by considering multiple factors, such as the sensitivity of the species, the quality of habitat being impacted, and the value of the lands being preserved or credits being acquired. The consideration of these factors does not always result in a compensatory mitigation ratio greater than 1:1 and typically does not exceed a 1:1 ratio for species that are not formally protected under the provisions of the federal or state endangered species acts. The adequacy of mitigation measures for impacts on Mojave fringe-toed lizard is **Draft EIR Appendix 5.4 BIG-1 Section 6.0: Impact Analysis**; accordingly, impacts would be adequately reduced to a less than significant level with the implementation of the proposed measures. Final compensatory mitigation for Mojave fringe-toed lizard would be determined in coordination with CDFW, as stated in **MM BIG BIO-24**. Regarding alternatives, the no project alternative was evaluated, as required by CEQA, which is a scenario where no development within the Mojave River, or its floodplain, is considered.

S8-37 Recirculation is not warranted as the impact analysis and mitigation measure are adequate under CEQA as discussed in **Response S8-27** through **S8-36** above. However, the Draft EIR has been revised, as shown below, to adopt 'some of the recommended revisions to **MM BIG BIO-24**.

The revision to "Project activities" instead of "construction mobilization activities" results in a broad nonspecific timing of the implementation of the measure. "Project activities" are not definitive in the Draft EIR so the specification of "prior to construction mobilization activities" is more precise and appropriate.

The City and BIG Project proponent also acknowledges CDFW's concerns regarding the sensitivity of the species and its habitat, and the minimum mitigation ratio would be updated to 2:1 from 1:1. The revision allows for the possibility that the final compensatory mitigation ratio may be more than 2:1 for Mojave fringe-toed lizard, which would be coordinated with CDFW. The BIG Project proponent agrees that mitigation lands supporting Mojave fringe-toed

[49] *Nassiri v. City of Lafayette* (2024) 103 Cal.App.5th 910.

lizard within the Mojave River watershed would be the most valuable in terms of compensatory mitigation due to their similar genetic makeup to the population potentially impacted by BIG; the mitigation measure is therefore revised so that lands within the Mojave River Watershed are prioritized. Language allowing for the nesting of credits suitable for other sensitive resources requiring compensatory mitigation must be included in the measure to allow for efficiency of the compensatory mitigation process.

MM BIG BIO-24 would be updated to reflect the changes discussed above: prioritizing the acquisition of lands for Mojave fringe-toed lizard within the Mojave River watershed and determining final compensatory mitigation in coordination with CDFW. A minimum 1:1 mitigation ratio is consistent with CEQA precedent for reducing impacts on a non-listed species of special concern and associated habitat. As discussed in the Biological Resources Technical Report, habitat is of varying quality and only 552 acres are considered highly suitable for the Mojave fringe-toed lizard. Nonetheless, to address concerns raised by CDFW's comments regarding sensitivity of the species and its habitat, **MM BIG BIO-24** would be revised from a minimum 1:1 ratio to a 2:1 ratio. Despite the varying qualities of impacted habitat for the state Species of Special Concern, mitigation acreage would equate to the protection of over 2,000 acres of suitable dune habitats for Mojave fringe-toed lizard.

MM BIG BIO-24 (pages 5.4-89 and 5.4-90) is revised in the **Final EIR Section 3.0: Errata to the Draft EIR**, as follows:

MM BIG BIO-24: Mojave Fringe-toed Lizard Compensatory Mitigation. Prior to construction mobilization activities, the implementing entity shall prepare a compensatory mitigation plan for direct impacts on Mojave fringe-toed lizard and 1,009.1 acres of occupied dune habitat (active desert dunes, stabilized and partially stabilized dunes, disturbed stabilized and partially stabilized dunes). Dune habitat shall be mitigated in-kind through the acquisition and preservation of dune habitat suitable for Mojave fringe-toed lizard at a minimum ~~1~~2:1 ratio to offset permanent and temporary impacts on Mojave fringe-toed lizard habitat. Land selected for compensatory mitigation must be:

- Deposits of aeolian or fine windblown sands associated with dunes, washes, hillsides, margins of dry lakes, and/or sandy hummocks within the Mojave Desert;
- Occupied with Mojave fringe-toed lizard or with potential for connectivity to lands occupied by Mojave fringe-toed lizard;
- Prioritized within the Mojave River Watershed;
- Near land currently under or planned for protection; and
- Not characterized as highly disturbed.

A long-term management plan and endowment for land acquisition, preservation, and management in perpetuity shall be established by a qualified land manager/conservancy. All or any portion of the compensatory mitigation lands/credits acquired for impacts on other sensitive resources (i.e., aquatic resources or sensitive vegetation communities) may also be used to fulfill compensatory mitigation requirements for Mojave fringe-toed lizard For example, compensatory mitigation pursuant to **MM BIG BIO-16** and **MM BIG BIO-22**

may also be used to fulfill compensatory mitigation requirements for Mojave fringe-toed lizard if acquired mitigation lands/credits meet the criteria above. Final compensatory mitigation for Mojave fringe-toed lizard shall be determined in coordination with CDFW.

These changes to **MM BIG BIO-24** only clarifies the measure included in the Draft EIR, and the conclusions of the Draft EIR remain valid. Also see **Consolidated Response 03** concerning recirculation of the Draft EIR.

S8-38 Arroyo toad is more thoroughly discussed in the **Draft EIR Appendix 5.4 BIG-1 Section 5.0: Environmental Setting**. As described in the Biological Resources Technical Report, RBC determined that arroyo toad has no potential to occur within BIG based on an extensive desktop review of arroyo toad scientific literature and database queries, knowledge of the species' natural history, and informal consultation with the USFWS. A single record of arroyo toad was listed in the CNDDB from 1949 in the Mojave River north of BIG. However, the specimen may have been washed downriver from a population further upstream during a flood (City of Barstow, 2014). This record is very dated, and no other records or observations were found in BIG's region. Records of arroyo toads nearest to BIG were documented between 2017 – 2020 at four sites within the Mojave River Basin Watershed: Horsethief Creek, Little Horsethief Canyon, Mojave River West Fork, and in the vicinity of Mojave Forks Dam and Deep Creek (Hitchcock et. al., 2022). The location of these records is consistent with the populations described in the Desert Recovery Unit outlined in the Recovery Plan and occur between 45 and 80 miles upstream of BIG. The substantial distance of known populations from the BIG site (45-80 miles away) supports the conclusion that Arroyo toad is not expected to be present. Additionally, informal consultation with the USFWS, who regulate the species under the federal ESA, confirmed this conclusion. Accordingly, pre-construction surveys specific to Arroyo toad are not warranted.

S8-39 As discussed in the **Draft EIR Appendix 5.4 BIG-1** sections referenced in **Response S8-38** above, there is no suitable breeding habitat for arroyo toad within BIG as shallow pools that may sustain egg and larval development are lacking from the river and other watercourses on site. The aquatic features within BIG are extremely intermittent and do not sustain pools suitable for breeding. Although the Mojave River bordering BIG to the north may flow ephemerally following infrequent heavy rain events in the region from year to year, the flow of water in the portions of the river in the vicinity of BIG is likely too rapid to support arroyo toad breeding. It is understood that Arroyo toad has experienced population decline as stated in this comment. However, an extensive review of Southern California Arroyo toad populations was conducted, and none were found in the region of the site. The BIG site was also evaluated for habitat suitability and the evaluation concluded that habitats on site to be unsuitable for breeding by the species even if it occurred in the region. Thus, the reasonable conclusion is that the species is not expected to present and therefore there would be no impact associated with BIG. Mitigation measures are not required in cases of no impact as they are designed to reduce impacts that have some potential to occur. (State CEQA Guidelines § 15126.4(a)(3) [mitigation measures are not required for effects that are found not to be significant].) Because the proposed mitigation measure does not, based on

substantial evidence, clearly lessen BIG's significant environmental impacts, not including it in the EIR does not trigger the need to recirculate under State CEQA Guidelines § 15088.

S8-40 Based on the historical and current ranges of extant arroyo toad populations (Hitchcock et. al., 2022; Jennings and Hayes, 1994; USFWS, 1999; USFWS, 2009a; USFWS, 2023) and the current data on dispersal distances, the 1949 record detailed in the CNDDB is considered an outlier and not representative of the current site/regional conditions that could support the species. Based on a lack of evidence of an extant population occurring within the vicinity, region, or aquatic dispersal range (**Response S8-38**), and absence of suitable breeding habitat on site or adjacent to the site (**Response S8-39**), it was concluded that arroyo toad has no potential to occur within BIG. This information provides a thorough technical analysis of potential impacts to the species leading to the conclusion that impacts would not occur.

Because the Draft EIR concludes that there would be no impacts on arroyo toad through an adequate assessment of regional populations and habitat suitability, both of which are absent, mitigation measures for the species are not necessary. Mitigation measures are only necessary under CEQA for potential impacts that have been identified as reasonably foreseeable to occur. (State CEQA Guidelines § 15126.4(a)(3) [mitigation measures are not required for effects that are found not to be significant].) Therefore, the new mitigation measure recommended by CDFW in this comment is not warranted. Because the proposed mitigation measure does not, based on substantial evidence, clearly lessen BIG's significant environmental impacts, not including it in the EIR does not trigger the need to recirculate under State CEQA Guidelines § 15088.

S8-41 Crotch's bumble bee is more thoroughly discussed **Draft EIR Appendix 5.4 BIG-1 Section 5.0: Environmental Setting**. As described in the Biological Resources Technical Report, RBC determined that Crotch's bumble bee has no potential to occur within BIG based on an extensive desktop review of Crotch's bumble bee literature and database queries as well as knowledge of the species' natural history. Evidence suggests a decline in the Crotch's bumble bee extent of occurrence between its current range and its historic range (The Xerces Society, 2018). Although BIG is located within the species' historic range there are very few records of Crotch's bumble bee occurring in the vicinity of BIG and the surrounding region. Only four sightings have been recorded within 20 miles of BIG. A 12-quad CNDDB search lists a 1944 record from Bell's Mountain approximately 12 miles south of BIG and a 1988 record approximately 17 miles northwest of BIG between CA State Routes 58 and 395 (CDFW, 2025b). In addition, iNaturalist lists a 2019 record approximately 17 miles southeast near Sidewinder Mountain and a 2025 sighting approximately 20 miles southwest of BIG in Victorville (iNaturalist, 2025).

As further described in the Biological Resources Technical Report, the lack of Crotch's bumble bee observations in the region is likely due to several factors leading to the absence of suitable habitat on BIG. The average annual precipitation at BIG between 2020 and 2025 is 4.8 inches (NOAA, 2025). The low precipitation rates in the vicinity of BIG in conjunction with general site disturbance and a lack of microhabitats has contributed to a low diversity and abundance of annual plant species present on site. In addition, during the Active Colony Period (April 1 –

August 31) between 2020 and 2025, the maximum daily temperatures on BIG ranged from 89-115 degrees Fahrenheit (NOAA, 2025). Based on the ideal temperatures for conducting focused surveys (65-90 degrees Fahrenheit) outlined in the Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species (CDFW, 2023b), the high daily temperatures on BIG are not suitable for Crotch's bumble bee. These factors contributed to RBC's determination that there is no potential for Crotch's bumble bee to occur within BIG. As such, focused surveys for Crotch's bumble bee were determined to be unnecessary. Focused surveys are not required if technical analysis of the species requirements and habitat conditions determine they would not occur on site.

S8-42 Per **Response S8-41** above, a thorough habitat assessment was conducted, and it was concluded that Crotch's bumble bee would not occur on the BIG site due to a lack of suitable habitat and climatic conditions. Thus, impacts on/take of Crotch's bumble bee would not occur and species-specific mitigation measures for Crotch's bumble bee are not warranted. Mitigation measures are not required in cases of no impact as they are designed to reduce impacts that have some potential to occur. (State CEQA Guidelines § 15126.4(a)(3) [mitigation measures are not required for effects that are found not to be significant].) Because the proposed mitigation measure does not, based on substantial evidence, clearly lessen BIG's significant environmental impacts, not including it in the EIR does not trigger the need to recirculate under State CEQA Guidelines § 15088.

S8-43 Crotch's bumble bee's status as a CESA candidate and applicability of the CESA to the species as well as CFGC take definitions are disclosed in **Draft EIR Appendix 5.4-1 Section 6.0: Impact Analysis, Section 5.0: Environmental Setting** and **Section 3.0: Laws, Regulations and Orders**.

Based on Crotch's bumble bee's status as a CESA candidate species as disclosed in the **Draft EIR Section 5.4: Biological Resources** and **Draft EIR Appendix 5.4 BIG-1** sections as referenced above, RBC conducted a desktop review and habitat assessment to evaluate Crotch's bumble bee's potential to occur within BIG. See **Response S8-41** and **S8-42** above regarding Crotch's bumble bee and the conclusions of this analysis.

S8-44 Based on the lack of documented occurrences of Crotch's bumble bee within and in the vicinity of BIG (S8-41), in addition to the lack of microhabitats providing suitable nectar sources and the high average daily temperatures during the colony active period (S8-42), Crotch's bumble bee has no potential to occur within BIG. Therefore, no impacts on Crotch's bumble bee are anticipated and mitigation measures for the species are not necessary. Mitigation measures are only necessary under CEQA for potential impacts that have been identified as reasonably foreseeable to occur. (State CEQA Guidelines § 15126.4(a)(3) [mitigation measures are not required for effects that are found not to be significant].) Therefore, the new mitigation measure recommended by CDFW in this comment is not warranted. Because the proposed mitigation measure does not, based on substantial evidence, clearly lessen BIG's significant environmental impacts, not including it in the EIR does not trigger the need to recirculate under State CEQA Guidelines § 15088.

S8-45 This is a general comment that includes introductory remarks, a summary of CEQA provisions and case law and a general description of the project setting. As a result, no specific response is provided here. See **Response S8-47.**

S8-46 The commenter asserts that the alternatives analysis does not adequately evaluate a range of alternatives that could reduce or avoid biological resources impacts to a level less than significant level. However, the Lead Agency need not evaluate a range of alternatives that would reduce impacts to a less than significant level. Pursuant to State CEQA Guidelines § 15126.6, the range of feasible alternatives need only "substantially lessen one or more of the significant effects" of the project. Further, the Draft EIR is not required to consider alternatives which are infeasible, only "those that could feasibly accomplish most of the basic objectives of the project" (State CEQA Guidelines § 15126.6). See also **Consolidated Response 14** concerning consideration of a range of reasonable alternatives.

The commenter suggests that the "Reduced Intensity" alternative would not reduce BIG's footprint and that only the solar farm footprint would be reduced. However, this characterization does not fully reflect the BIG changes associated with the alternative. **Draft EIR Section 8.10.2**, page 8-89 states that under the "Reduced Intensity" alternative, "the rail yard and transload warehouse center's development intensity and footprint would be reduced by approximately 50 percent," when compared to BIG. Under this alternative the BIG footprint, excluding the solar farm, would be reduced. **Draft EIR Table 8-13: Reduced Intensity Alternative Compared to BIG** (page 8-13) shows that there would be an approximately 1,635-acre reduction in transload warehouse and railyard footprints.

S8-47 Commenter recommends that the EIR be revised to include a "more robust" alternatives analysis, but does not identify any specific alternatives to be considered or evaluated, nor does the commenter provide substantial evidence to support their suggested alternatives as feasible and that they would also meet most of BIG's basic objectives. The comment cites a court decision as justification for the recirculation of the Draft EIR, but the issue before the court in that case did not concern recirculation based on the evaluation of a range of feasible alternatives.[50] In general, recirculation is only necessary with respect to the alternatives analysis if a specific alternative is proposed by a commenter that is feasible; considerably different from the alternatives or mitigation measures already evaluated in the draft EIR; would clearly lessen the project's significant environmental impacts; and not adopted.[51] The comment did not identify such an alternative and, as a result, no recirculation is required. Also see **Consolidated Response 03** concerning the recirculation of the Draft EIR and **Consolidated Response 14** concerning consideration of a range of reasonable alternatives.

S8-48 Non-potable water demands would be wholly met by up to eight proposed private groundwater wells (see **Draft EIR Section 5.17: Utilities and Service Systems** (page 5.17-76)) using BNSF's existing water rights and through the purchase of additional credits. These wells would not provide potable water and the 311 acre-feet (AF) of potable water demand during construction would be met by the Golden State Water Company (GWSC). GWSC's ability to

[50] *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412.
[51] *South County Citizens for Smart Growth v. County of Nevada* (2013) 221 Cal.App.4th 316, 330.

meet water demands is described in **Draft EIR Appendix 5.17 BIG-1 Utility Assessment Technical Report** and **Appendix 5.17 BIG-2 Water Supply Assessment** and within their own Urban Water Management Plan (UWMP). Non-potable wells may be decommissioned and abandoned at the end of construction (**Draft EIR Appendix 5.17 BIG-2** page 13). Further, BIG would remove existing uses and properties which currently extract groundwater and would abandon these wells in accordance with all applicable laws, regulations, and ordinances. Total groundwater use and draw would occur within the established regulatory requirements, including the Judgment and Watermaster Rules and Regulations. As BIG would not result in the exceedance of groundwater extraction allowances, the groundwater levels would not be substantially impacted and would therefore not impact downstream biological resources that may depend on groundwater.

S8-49 See **Response S8-48**. Groundwater extraction would occur within allowed levels and plans, such as the GWSC's UWMP. The Mojave River is primarily described as a "losing" river, meaning it loses a significant amount of its surface water to the permeable sandy riverbed.[52] Further, surface flows and reaches within the BIG footprint and surrounding area are intermittent, meaning that surface waters only flow through these reaches during and immediately after rainfall events and when snow melt occurs in the San Bernardino Mountains. The extraction of groundwater would change these water features from a gaining feature (water moving from the ground into the feature) to a losing feature. BIG implementation would result in similar ground-surface water interactions as those in existing conditions, which would result in largely similar sediment availability and wind-driven transport.

S8-50 The Draft EIR provides an analysis of cumulative impacts for all resource areas, See **Draft EIR Section 6.0: Cumulative Impacts**. See **Draft EIR Section 6.6.4** and **Section 6.6.10** for discussions regarding biological resources and hydrology and water quality.

S8-51 BIG would decommission and abandon existing wells within the BIG footprint and then construct up to 8 new non-potable wells. These new wells would not be in addition to the existing groundwater wells within the BIG footprint, but would be replacing them. Further, the hexavalent chromium-contaminated groundwater plumes in Hinkley flow northward, away from both the Mojave River and BIG, and have been shrinking (**Draft EIR Section 5.9,** page 5.9-64).

Moreover, the radius of influence of a well is determined not by the flowrate of groundwater extraction, but rather by the soil and aquifer conditions (e.g., hydraulic conductivity and recharge rate). The radius of influence is generally considered to be the maximum extent and forms the outmost edge of the cone of depression in wells. The hydraulic grade line of the cone of depression forms an asymptotic relationship with the water table as radius from the well increases. Therefore, the measured drawdown decreases logarithmically with the radius measured from the well. Considering the hexavalent chromium-contaminated groundwater plumes in Hinkley are several miles away from BIG and that the typical radius of influence of

[52] *https://pubs.usgs.gov/wri/1974/0017/report.pdf* (page 14).

groundwater wells is calculated to be in the hundreds of feet, interaction between groundwater and hexavalent chromium-contamination is virtually impossible. See **Consolidated Response 03** concerning recirculation of the Draft EIR. Additionally, see page 5.9-64 of the Draft EIR, which states "Review of the latest plume maps indicates that the groundwater flow direction in the PG&E site area is northerly (away from the City)". Because the plume flows northerly (away from BIG), there would be no contamination involving hexavalent chromium.

S8-52 See **Response S8-51**. Further, water demand during operations would be supplied by GWSC not by on-site private wells. Long-term water demand is evaluated in **Draft EIR Section 5.17: Utilities and Service Systems.** Accordingly, the Draft EIR does not have to be revised to address long-term groundwater demand, potential for contamination risks or implications to nearby water-dependent habitats.

S8-53 See **Response S8-55** and **Consolidated Response 03** concerning recirculation of the Draft EIR.

S8-54 Commenter states that the Project should include recommendations from the Lahontan Regional Water Quality Control Board ("Water Board") comment letter into the Project and recirculate the EIR. The Water Board letter provided general comments on the Draft EIR that recommended that the City integrate elements that (1) promote watershed management; (2) support "Low Impact Development" (LID); and (3) reduce the effects of hydromodification, but did not provide any specific comments on how these should be made part of the Project. The Water Board letter also did not identify any issues with the Draft EIR's analysis and conclusions with respect to these general recommendations. CEQA does not require the lead agency to address suggested mitigation for an environmental impact that is not concrete, or to consider a list of general suggestions not specific to the project.[53] Due to the general nature of the Water Board's recommendations, it is unclear how the commenter says the Project must be revised and the Draft EIR recirculated. See **Response S8-55** and **Consolidated Response 03** concerning the recirculation of the Draft EIR.

S8-55 Impacts to groundwater and the watershed, along with a discussion on the implementation of low impact development (LID) are addressed in **Draft EIR Section 5.10: Hydrology and Water Quality** and **Draft EIR Appendix 5.10 BIG-1 Hydrology and Hydraulic Design Technical Report**. BIG would be required, in accordance with LID practices and National Pollutant Discharge Elimination System (NPDES) requirements, to mimic the site's predevelopment hydrology by maintaining existing runoff rates and volumes. As such, the Draft EIR is adequate and need not be recirculated. See also **Consolidated Response 03** concerning the recirculation of the Draft EIR.

S8-56 See **Responses S8-45** through **S8-55**, and **Consolidated Response 03** concerning the recirculation of the Draft EIR.

S8-57 The City and BIG Project proponent acknowledges CDFW's comment regarding the ecological sensitivity of the Mojave Desert and Mojave River Watershed and the importance of

[53] *Santa Clarita Organization for Planning the Environment v. City of Santa Clarita* (2011) 197 Cal.App.4th 1042.

maintaining wildlife movement and habitat connectivity. The Draft EIR evaluates potential impacts on wildlife movement and connectivity consistent with the State CEQA Guidelines. The Biological Resources Technical Report accurately describes the project setting, existing habitat conditions, mapped/modeled habitat linkage and connectivity areas, and documented wildlife movement across the project site. The Biological Resources Technical Report also identifies existing anthropogenic barriers to wildlife movement, including National Trails Highway and the existing railway, which influence wildlife movement across the site.

The impact analysis evaluates all planned project components, including roads, rail lines, and security fencing, and analyzes how these features could affect wildlife movement and habitat connectivity. Direct, indirect, and cumulative impacts on wildlife movement are addressed in **Draft EIR Appendix 5.4 BIG-1 Biological Resources Technical Report Section 6.0: Impact Analysis** and **Draft EIR Section 5.4: Biological Resources**. The Draft EIR concludes that impacts on wildlife movement and connectivity would be less than significant with implementation of mitigation measures.

CDFW's comments regarding wildlife connectivity analysis and mitigation are further addressed in **Response S8-58** through **S8-68** below.

S8-58 The City and BIG Project proponent acknowledges CDFW's comments regarding the role of wildlife crossings in facilitating movement of wildlife species, including desert kit fox, American badger, and small mammals and reptiles. The wildlife crossing at Milepost 12.5 was developed to address potential impacts on wildlife movement and connectivity by providing a dedicated wildlife crossing at a location informed by site constraints, wildlife movement data, field input from CDFW staff, and engineering feasibility. The wildlife crossing includes two components: a crossing beneath National Trails Highway and a separate crossing beneath the BNSF rail line. Together, the two crossings would allow wildlife to move from the Mojave River area under the BNSF rail line and under National Trails Highway in either direction. **MM BIG BIO-32** has been revised, as shown below, to clarify the distinction between these two components (see **Response S8-66** below).

The National Trails Highway component is not co-located with any water conveyance features (e.g., culverts) as suggested by this comment and is designed exclusively to facilitate wildlife movement beneath the roadway. Hydrologic modeling indicates that this structure would not function as a hydraulic conveyance and would not be subject to inundation during storm events under anticipated design conditions. As such, this component is not constrained by hydraulic design requirements associated with stormwater infrastructure.

National Trails Highway currently represents a barrier to wildlife movement, with no existing dedicated crossings beneath the roadway within the project area. As documented in the Wildlife Movement Study, medium-sized mammals and other wildlife continue to cross or attempt to cross the roadway, as evidenced by wildlife detections and roadkill observations along this segment of National Trails Highway (see Appendix GG of the **Draft EIR Appendix 5.4 BIG-1**). These observations indicate that movement of local resident wildlife species across

the roadway is occurring despite the absence of safe crossing opportunities and that wildlife-vehicle collision risk is present under existing conditions.

The National Trails Highway wildlife crossing therefore introduces a new connectivity feature intended to address wildlife-vehicle interactions and provide an opportunity for wildlife passage for a range of species known to occur in the area. By providing a dedicated crossing location beneath the roadway, BIG would introduce a new opportunity for wildlife movement across National Trails Highway relative to existing conditions and is intended to support wildlife passage along this transportation corridor. In addition, the planned size of this structure has been increased in coordination with CDFW during BIG development based on anticipated use by target wildlife species; see **Response S8-64** for more information regarding the size of the structure.

While final engineered design details would be refined during final design, **MM BIG BIO-32** establishes the requirement for a wildlife crossing that functions to facilitate wildlife movement between areas of natural habitat on either side of the railway. The City and BIG Project proponent recognizes that the effectiveness of wildlife crossings depends on appropriate sizing, placement, internal design features, and periodic maintenance. As such, **MM BIG BIO-32** requires that the wildlife crossing be designed and constructed to accommodate use by target wildlife species present in the project area and to function under anticipated site conditions.

In addition, **MM BIG BIO-32** has been revised, as shown below, to include that final sizing, placement, and configuration of the wildlife crossing would be refined during final engineering design in coordination with CDFW. Revisions clarify that **MM BIG BIO-32** requires the wildlife crossing to be designed to provide all-weather functionality where feasible and to incorporate design features that promote wildlife use, which may include natural substrate, structural cover elements, and other features consistent with species-specific movement needs. These clarifications do not change the impact conclusions of the Draft EIR but provide additional detail regarding implementation of **MM BIG BIO-32** in response to CDFW's comment. These changes to **MM BIG BIO-32** only clarifies the measure included in the Draft EIR, and the conclusions of the Draft EIR remain valid. Also see **Consolidated Response 03** concerning the recirculation of the Draft EIR.

S8-59 The City and BIG Project proponent acknowledges CDFW's comment regarding the geographic extent of **MM BIG BIO-32** and the importance of considering wildlife movement and connectivity in desert environments. The Draft EIR recognizes that wildlife movement and connectivity are influenced by both project-related features and existing landscape conditions, including current infrastructure, land use patterns, and habitat quality across the project site and surrounding region.

The Draft EIR's analysis of wildlife movement and connectivity is not limited to the southwestern portion of the BIG footprint but rather considers the footprint within the broader regional context of the Mojave Desert and Mojave River Watershed. As described in **Draft EIR Section 5.4: Biological Resources** and **Appendix 5.4 BIG-1,** the project site is already

intersected by substantial existing barriers to wildlife movement, including the BNSF railway and National Trails Highway, which constrain the site's potential for continuous wildlife movement.

The location of the wildlife crossing described in **MM BIG BIO-32** was based on site conditions, documented wildlife movement patterns, and engineering feasibility. The purpose of **MM BIG BIO-32** is to reduce project-related impacts on wildlife movement at a constrained crossing location and address connectivity between open space south of the railway and the Mojave River corridor rather than to address landscape-scale connectivity across areas that are already fragmented by existing development and infrastructure. As revised, **MM BIG BIO-32** has been clarified to require that wildlife crossing design be refined during final engineering, in coordination with CDFW, to maximize effectiveness for wildlife movement to the extent feasible under site-specific conditions.

As described in the BIG Wildlife Movement Study, Appendix GG of **Draft EIR Appendix 5.4 BIG-1**, local resident species were observed moving through the Lenwood Channel at the east side of the project site, indicating that this feature currently functions as a wildlife movement pathway. In particular, coyotes were documented using this feature. The Lenwood Channel would continue to function as an unobstructed movement corridor following Project construction. **MM BIG BIO-32** has been revised, as shown below, to include measures that would maintain and, where feasible, support wildlife movement opportunities within the Lenwood Channel consistent with its existing function.

The scientific literature cited by CDFW underscores the general importance of landscape connectivity in desert ecosystems; however, as required by CEQA, the Draft EIR's analysis and mitigation framework are based on site-specific conditions, documented wildlife use, and BIG's contribution to wildlife movement impacts under existing site conditions. As concluded in the Draft EIR, with implementation of **MM BIG BIO-32** and other biological resources mitigation measures, BIG's impacts on wildlife movement and connectivity would be mitigated to a less-than-significant level.

S8-60 The City and BIG Project proponent acknowledges CDFW's recommendations, several of which have already been completed and informed the Draft EIR's biological resources analysis and mitigation.

Wildlife Movement Studies: A site-specific 12-month wildlife movement camera study was conducted for the project site and is documented in **Draft EIR Appendix 5.4 BIG-1** Appendix GG. This study was designed to assess existing wildlife movement patterns and identify potentially important movement areas within and adjacent to the project site, while accounting for seasonal variation. It employed site-specific surveys, camera monitoring, and field observations to identify key movement areas and inform connectivity analysis. As documented in the Biological Resources Technical Report, the species detected during the wildlife movement camera study were relatively common residents. Results from the study were used to characterize baseline conditions, evaluate potential project impacts on wildlife movement and connectivity, and inform the selection and refinement of mitigation measures,

including design considerations for **MM BIG BIO-32**. The Draft EIR, supported by this Biological Resources Technical Report, provides substantial evidence to assess wildlife connectivity impacts and identify feasible mitigation. CEQA does not require additional or continuous wildlife movement monitoring beyond the scope of this study because the study provides an adequate basis for evaluating impacts and implementing mitigation to reduce impacts to a less-than-significant level.

Hydraulic Performance of Culverts and Underpasses: Hydrologic and hydraulic considerations for project drainage features were incorporated into BIG's design and would be further addressed during final engineering. As clarified in the revised mitigation measure, **MM BIG BIO-32** requires that wildlife crossings be designed to function as all-weather wildlife passages to the extent feasible and to avoid permanent standing water during typical storm events. As noted in **Response S8-59**, the National Trails Highway component of the wildlife crossing is not co-located with a drainage structure. Final hydraulic analyses would be conducted during detailed engineering and results coordinated with CDFW to ensure compliance with applicable standards.

Wildlife Crossing Design Features: As revised, **MM BIG BIO-32** requires incorporation of natural substrate, structural cover elements, and other microhabitat features designed to facilitate use by a range of species present in the project area, including small and medium mammals and reptiles.

Directional Fencing and Barriers: The Draft EIR already incorporates a mitigation measure (**MM BIG BIO-34**) to address directional fencing and barriers to guide wildlife and prevent access to hazardous infrastructure. **MM BIG BIO-34** describes project fencing design and requires that fencing plans be reviewed and approved by a CDFW-approved designated biologist.

Assessment of Direct, Indirect, and Cumulative Impacts: The Draft EIR evaluates direct, indirect, and cumulative impacts on wildlife movement and connectivity for both the project site and the surrounding landscape in **Draft EIR Appendix 5.4 BIG-1 Section 6.0: Impact Analysis**. Impacts were assessed for key species present in the project area, including desert tortoise, Mojave fringe-toed lizard, bobcat, coyote, American badger, and desert kit fox. The analysis concludes that, with implementation of mitigation measures, direct, indirect, and cumulative impacts on wildlife movement and connectivity for these species would be reduced to a less-than-significant level. The Draft EIR and Biological Resources Technical Report provide substantial evidence supporting these conclusions and demonstrate that BIG's contribution to cumulative habitat fragmentation and connectivity impacts is adequately mitigated. The Draft EIR, supported by a 12-month wildlife movement study and revised mitigation measures, satisfies CEQA's requirements for analysis and mitigation of wildlife connectivity impacts.

S8-61 CDFW expresses concern that **MM BIG BIO-32**, as currently proposed, may not effectively mitigate potential impacts on wildlife connectivity across the project site. The Draft EIR acknowledges that **MM BIG BIO-32** is a single wildlife crossing at Milepost 12.5 beneath the

BNSF railway, designed to facilitate movement by multiple species. **MM BIG BIO-32** has been revised in **Response S8-66** below to include both components of the Milepost 12.5 wildlife crossing: the crossing under National Trails Highway and the separate crossing under the BNSF rail line, as well as enhancements to the widened Lenwood Channel. However, the Draft EIR does not rely solely on this crossing to mitigate connectivity impacts.

As documented during the wildlife movement study, medium-sized mammals use the Lenwood Channel at the east side of the project site for localized movement, in addition to culverts along the southwestern lead track extension area. Construction activities associated with BIG, including improvements to the southwestern lead track and widening of the Lenwood Channel, may temporarily affect these pathways; however, post-construction, the structures would continue to support wildlife movement and dispersal. **MM BIG BIO-32** has been revised, as described in **Response S8-59** and as shown in **Response S8-66**, to maintain and, where feasible, enhance wildlife movement opportunities within the Lenwood Channel consistent with its existing function.

While **MM BIG BIO-32** represents a single crossing (prior to inclusion of Lenwood Channel enhancements in the revised measure below), the Draft EIR evaluates connectivity impacts in a broader regional context, considering existing barriers, landscape conditions, and cumulative impacts within the Mojave Desert and Mojave River Watershed. **MM BIG BIO-32** is one component of a broader mitigation framework. Compensatory mitigation for the permanent loss of habitat would be implemented through the acquisition, preservation, and long-term management of off-site habitat mitigation lands. The amount and ecological value of mitigation lands is expected to exceed the acreage permanently impacted by BIG, as determined through coordination with and approval by the wildlife resource agencies.

Mitigation lands would be selected to support desert tortoise, burrowing owl, Mojave fringe-toed lizard, and other resident and migratory wildlife species, and would be located in areas that maintain or enhance habitat connectivity, have minimal existing barriers to movement, and are designated as conservation priorities by resource agencies to the extent feasible. These lands would be managed in perpetuity pursuant to agency-approved long-term management plans. By conserving large, contiguous areas adjacent to existing protected lands, BIG's compensatory mitigation would contribute to maintaining regional habitat connectivity and help reduce fragmentation at a landscape scale.

Based on this analysis, and with implementation of mitigation measures, the Draft EIR concludes that direct, indirect, and cumulative impacts on wildlife connectivity would be reduced to a less-than-significant level. CEQA requires mitigation to reduce impacts to the extent feasible, and the Draft EIR provides substantial evidence that these measures are feasible, enforceable, and sufficient to mitigate BIG's impacts. No substantial new evidence indicates that these measures are inadequate, and recirculation of the Draft EIR is not warranted. Also see **Consolidated Response 03** concerning recirculation of the Draft EIR.

S8-62 CDFW expresses concern that the Draft EIR does not fully characterize the ecological importance of the project site as a regional wildlife movement corridor. **Draft EIR Section 5.4**

Biological Resources and **Appendix 5.4 BIG-1 Biological Resources Technical Report** provide a detailed description of the site's biological setting, including habitat types, current conditions, and connectivity values. The Biological Resources Technical Report also maps the project site's intersection with regional connectivity zones mentioned in this comment, including the Terrestrial Connectivity Area of Conservation Emphasis (ACE), California Desert Linkage Network, CEHC Potential Riparian Connection, CEHC Essential Connectivity Area, and the Mojave River – Barstow/Camp Cody Linkage identified in the Missing Linkages project (see **Draft EIR Appendix 5.4 BIG-1 Figure 3.5-1**).

The Draft EIR's environmental setting reflects the site's ecological context at both local and regional scales, noting habitat corridors, existing landscape features and potential barriers, and areas of observed wildlife movement. This information forms the basis for evaluating potential direct, indirect, and cumulative impacts on wildlife connectivity, and informs the design and implementation of mitigation measures such as **MM BIG BIO-32**. The Draft EIR and Biological Resources Technical Report provide substantial evidence that BIG occurs within a valuable regional wildlife movement corridor (based on the regional mapping sources cited above) and that resident wildlife species move through the site to access resources (food, cover, and water) as would be expected on any open desert lands in the region characterized by some level of native habitat. Potential impacts have been appropriately assessed and mitigated in accordance with CEQA as discussed in more detail in **Response S8-61** above.

S8-63 CDFW expresses concern that **MM BIG BIO-32**, while intended to facilitate wildlife movement beneath the BNSF railway and Main Street, may not fully address connectivity needs across the project site, particularly for small mammals and reptiles. **MM BIG BIO-32** been revised per **Response S8-66** below to include both components of the Milepost 12.5 crossing: the structure under National Trails Highway and the separate crossing under the BNSF rail line, as well as enhancements to the widened Lenwood Channel. The design of **MM BIG BIO-32** is informed by site-specific data from the 12-month wildlife movement study (**Draft EIR Appendix 5.4 BIG-1**) and considers species observed moving through existing culverts.

As described in **Responses S8-59** through **S8-60** above, hydraulic and structural considerations have been incorporated into **MM BIG BIO-32**. The mitigation measure requires that the crossings function as all-weather wildlife passages to the extent feasible, maintain a substrate of native soil along the culvert floors, and include habitat elements such as rocks, woody debris, or other cover to facilitate use by desert kit fox, American badger, bobcat, coyote, and other small mammals and reptiles. Final engineering-level design, including detailed hydraulic analyses, would be conducted in coordination with CDFW prior to construction to ensure that both components of the crossing perform as intended and to minimize risks of washout or flushing.

S8-64 CDFW expresses concern that the proposed wildlife crossing may be disconnected from known movement corridors. As discussed in **Responses S8-58** through **S8-61**, the placement of **MM BIG BIO-32** was informed by site-specific data from the 12-month wildlife movement study (see **Draft EIR Appendix 5.4 BIG-1**), in addition to engineering feasibility and site constraints.

The Wildlife Movement Study documented localized movement of resident terrestrial species. As described in **Response S8-63**, analysis of these data indicates that wildlife use of movement structures is primarily influenced by structural characteristics, particularly openness ration, rather than by precise location within the project site. Based on these findings, the proposed location of **MM BIG BIO-32** at Milepost 12.5 provides a strategically feasible crossing beneath the BNSF railway that links adjacent open space to the Mojave River corridor on the west side of BIG. This location also maintains access to regional movement pathways, including the CEHC Potential Riparian Connection, California Desert Linkage Network, and Mojave River–Barstow/Camp Cody Linkage. Enhancements to the Lenwood Channel, included in the revised **MM BIG BIO-32** (see **Response S8-59** and **S8-66**), support wildlife movement on the east side of BIG.

Alternative undercrossing locations closer to the central portion of the site were not advanced due to proximity to future rail yard operations, which may reduce wildlife use (or increase risks of mortality), and because longer structures (i.e., culverts) would have been necessary and would have resulted in lower openness ratios, reducing suitability for medium-sized mammals.

S8-65 CDFW expresses concern that exclusionary fencing could exacerbate habitat fragmentation if not paired with effective connectivity measures. Permanent security fencing is described in the Project Description and addressed in **MM BIG BIO-34**. This measure requires fencing to be designed and installed in coordination with a CDFW-approved biologist to prevent wildlife access to hazardous areas while maintaining opportunities for safe passage.

CDFW recommends that fencing be extended ½ to 1 mile along both sides of all project-related rights-of-way to guide wildlife toward safe crossing structures. While the City and BIG Project proponent acknowledges the intent of this recommendation, the Draft EIR does not propose fencing of this length due to practical and logistical constraints. Continuous fencing along the entire right-of-way would be infeasible in areas with existing driveways, roads, and other access points, which could allow wildlife to pass through and reduce the overall effectiveness of the fencing. In addition, hydrologic modeling indicates that strong stormwater sheet flows across National Trails Highway could result in washout of fencing, creating ongoing maintenance challenges, an issue CDFW has also observed in similar local projects.

In combination with **MM BIG BIO-32**, including the Milepost 12.5 wildlife crossing and enhancements to the Lenwood Channel (see **Response S8-59** and **S8-66**), the permanent fencing is intended to guide wildlife toward safe crossing locations and away from hazardous project components, while minimizing impacts to wildlife to the greatest extent feasible.

S8-66 CDFW's recommended revisions to **MM BIG BIO-32** related to exclusionary fencing have not been accepted per **Response S8-65** above. Other recommendations from CDFW have been included to strengthen **MM BIG BIO-32** as revised below. These revisions enhance wildlife movement and connectivity by requiring the design of all wildlife crossings to function as all-weather passages and include habitat features (e.g., substrate, woody cover, refuge

elements) to facilitate use by multiple species. As noted above in **Response S8-58** and **S8-59**, and below in response to this comment **MM BIG BIO-32** has also been revised to include the distinction between the two crossing components at Milepost 12.5, a crossing beneath National Trails Highway and a separate crossing beneath the BNSF rail line, and enhancements to the widened Lenwood Channel.

MM BIG BIO-32 (pages 5.4-104 and 5.4-105) is revised in the **Final EIR Section 3.0: Errata to the Draft EIR**, as follows:

MM BIG BIO-32: With BIG implementation ~~As part of BIG construction~~, a wildlife crossing shall be constructed at the Unnamed Stream (Milepost 12.5) below the BNSF tracks ~~and Main Street~~ to facilitate wildlife movement between areas of natural habitat on either side of the railway ~~and road~~. This rail~~way crossing~~ feature shall be placed alongside four smaller culverts constructed to convey water: three 36-inch and one 48-inch diameter culverts. The wildlife crossing shall be an 84-inch diameter culvert to facilitate passage beneath the rail right-of-way, which would connect open space east of the railway to the Mojave River, thereby maintaining access to existing linkages (i.e., the Rank 4/5 ACE, California Desert Linkage Network, and CEHC Potential Riparian Connection). The wildlife crossing shall also include a dedicated underpass beneath National Trails Highway to facilitate movement of wildlife from habitat south of the roadway to the culvert under the BNSF tracks, situated just south of the Mojave River corridor.

Design features for facilitating wildlife culvert usage shall include installing inlet and outlet points flush with the ground and maintaining one to six inches of native soil along the bottom of the culvert. The wildlife crossing shall be designed to function as all-weather wildlife passage to the extent feasible and shall be sized and configured to exceed minimum hydraulic conveyance requirements, or be located separately from primary hydraulic structures, as feasible, to ensure suitability for wildlife movement during both dry and wet conditions. Final sizing, placement, and configuration of the wildlife crossing shall be refined during final engineering design in coordination with the CDFW and other applicable agencies.

A long-term management plan for the wildlife crossing shall be submitted to the City of Barstow for review and approval prior to start of vegetation removal and/or mass grading. The long-term management plan shall include:

- Additional measures to encourage wildlife use include, but are not limited to, maintenance or restoration of native vegetation near, but not obstructing, culvert ~~mouths~~ or crossing entrances, and invasive plant removal
- Routine clearing of debris and trash from the ~~culvert~~ wildlife crossings shall be completed on a quarterly basis and following large storm events to allow ample space ~~is~~ to remain available for wildlife travel.
- Access points to the ~~culvert~~ wildlife crossings shall contain rocks or woody refuge sites to attract subterranean wildlife and structural cover elements shall be provided

within the structure, as feasible, to facilitate movement of small and medium mammals and reptiles.

- Habitat quality (i.e., the percentage of invasive versus native plants and level of anthropogenic degradation) within a 200-meter radius surrounding the ~~culvert access points~~ crossing entrances shall be monitored quarterly by a qualified biologist to confirm wildlife corridor functionality for the first two years following construction, with monitoring frequency and duration subject to adjustment based on observed conditions**.**
- A mitigation entity responsible for the implementation of the long-term management plan.

As part of BIG implementation, the existing Lenwood Channel would be widened per the Project Description as described in the Draft EIR. Enhancements to the channel shall be incorporated to maintain and support wildlife movement through the eastern portion of the project site toward the Mojave River corridor. A long-term management plan for the enhancements shall be prepared and submitted to the City of Barstow for review and approval prior to construction. The plan would include the following, to the extent feasible given site constraints:

- Installation and maintenance of fencing along the channel to guide wildlife through the channel while restricting entry into hazardous areas within the project footprint.
- Installation of native vegetation in select locations along the channel edges to provide cover, where practicable.
- Placement of structural cover features, such as rocks or woody debris, where feasible, to provide refuge for small and medium mammals and reptiles.
- Periodic clearing of debris and trash to maintain passable conditions for wildlife, particularly following significant storm events.
- Monitoring of conditions to assess functional wildlife passage.
- Assignment of a responsible mitigation entity to oversee implementation of the long-term management plan to be developed in accordance with the overarching objectives described above.

These changes to **MM BIG BIO-32** only clarifies the measure included in the Draft EIR, and the conclusions of the Draft EIR remain valid. Also see **Consolidated Response 03** concerning the recirculation of the Draft EIR.

S8-67 CDFW's recommended revisions to **MM BIG BIO-32** and **MM BIG BIO-34** related to extension of exclusionary fencing at least ½ to 1 mile along both sides of BIG-related rights-of-way have not been accepted per **Response S8-65**. Other revisions recommended by CDFW to **MM BIG BIO-34** have been incorporated into the mitigation measure as revised below. In addition, the USFWS BO has been added to the first sentence to clarify applicable regulatory guidance.

MM BIG BIO-34 (page 5.4-95) is revised in the **Final EIR Section 3.0: Errata to the Draft EIR**, as follows:

MM BIG BIO-34 Permanent Security Fencing. Prior to final construction design and upon securing a CESA ITP for CESA species and a USFWS BO for federally listed species, the designated biologist shall review and ~~approve~~ submit the fencing plans for ~~portions of~~ the BIG Specific Plan Area to CDFW for review and consultation that are adjacent to natural habitats to confirm the fences provide a sufficient barrier to restrict wildlife from entering the BIG Specific Plan area.

The permanent security fencing shall be enhanced with a barrier (e.g., fine-mesh fencing) that extends at least 12 inches below ground and 12 inches above ground to prevent special status reptile and mammal species, including desert tortoise, from moving through or underneath the fencing and gaining access to the BIG Specific Plan area. Where fencing is proposed between natural habitats and roadway right-of-way, at the 12-inch depth of the below-grade portion fence apron, the barrier shall extend or be bent at an approximately 90-degree angle and oriented outward from the roadway right- of-way a minimum of 12 inches to prevent fossorial (burrowing) mammals and reptiles from digging or tunneling below the security fence and gaining access to BIG. A climber barrier (e.g., rigid curved or bent overhang) shall be installed at the top of the apron to prevent reptiles and mammals from climbing over the apron. The designated biologists shall confirm that the selected apron material and climber barrier do not cause harm, injury, entanglement, or entrapment to wildlife species.

The implementing entity shall provide quarterly inspection and repair of the fencing. The specific design and method for installation method of an apron or barrier may vary as required by regulatory permits issued under the FESA or CESA. Prior to start of operations then quarterly, biological monitors shall field-inspect the fencing that is adjacent to natural habitats and confirm appropriate installation and the implementing entity shall carry out repair of the fencing, as needed. Fencing plan review and field inspection shall be documented in a memorandum from the designated biologists and provided to CDFW and the City.

These changes to **MM BIG BIO-34** only clarifies the measure included in the Draft EIR, and the conclusions of the Draft EIR remain valid. Also see **Consolidated Response 03** concerning recirculation of the Draft EIR.

S8-68 CDFW provides a summary of recommended updates to the Final EIR regarding wildlife connectivity, including mapping and description of corridors, evaluation of crossings, directional and exclusionary fencing, spatial placement of crossings, and agency coordination. See **Response S8-57** through **S8-67** concerning CDFW's specific comments related to these topics. The Draft EIR concludes that, with implementation of BIG-specific mitigation measures, direct, indirect, and cumulative impacts on wildlife connectivity are reduced to less-than-significant levels, consistent with CEQA requirements. The City has also strengthened mitigation measures in response to CDFW's comments as described in the responses listed above.

S8-69 As discussed in **Draft EIR Appendix 5.4 BIG-1 Section 6.0: Impact Analysis**, project plans avoid direct impacts to all western Joshua trees on BIG and their associated root systems with a

minimum 10-foot avoidance buffer. The additional avoidance measures cited in this comment, which were included in the **Draft EIR Appendix 5.4 BIG-1 Section 8.0 Mitigation Measures**, provide adequate assurance that construction best practices would be implemented and overseen by a qualified Biological Monitor per **MM BIG BIO-2** to facilitate complete avoidance of direct and indirect impacts. Additionally, as discussed in **Draft EIR Appendix 5.4 BIG-1 Section 5.0: Environmental Setting**, Joshua trees adjacent to the project work areas are believed to be ornamentally planted given that they occur within residential landscaping and are not a component of the naturally occurring vegetation on site and in the vicinity. Per CEQA significance thresholds, conclusion of a less than significant impact on western Joshua tree is defensible given the ornamental nature of the trees and complete avoidance proposed.

S8-70 Based on the current site conditions and avoidance measures to be implemented by BIG, a CESA ITP for western Joshua tree is not warranted as there would be no 'take' of the species, including damage to the roots of any tree because of the existing trees and root systems are not within the construction impact or staging areas and would not be disturbed in any manner by the BIG activities. It is recognized that conditions can change between CEQA analysis and project implementation. As discussed in **Response S8-69** above, a qualified Biological Monitor would be present for all vegetation clearing and initial ground disturbance. If new sprouts or newly emerged individual Joshua trees are identified during monitoring activities or other biological clearance surveys and they cannot be avoided, BIG would be obligated to follow CESA and obtain an ITP for take coverage. This is not characterized as mitigation under CEQA as there is no potential project impact based on the current conditions and a future, although unanticipated, permitting process would be considered standard regulatory compliance. (State CEQA Guidelines § 15126.4(a)(3) [mitigation measures are not required for effects that are found not to be significant].) Therefore, it is not needed or appropriate to incorporate a new mitigation measure requiring an ITP if needed in the future, as suggested in this comment. Rather, it is an implicit requirement for the BIG Project proponent to comply with state law and apply for a CESA permit if conditions change and take is identified as reasonably likely to occur. Because the proposed mitigation measure does not, based on substantial evidence, clearly lessen BIG's significant environmental impacts, not including it in the EIR does not trigger the need to recirculate under State CEQA Guidelines § 15088. Also see **Consolidated Response 03** concerning recirculation of the Draft EIR.

S8-71 See **Draft EIR Appendix 5.4 BIG-1 Section 5.0: Environmental Setting and Section 6.0: Impact Analysis,** and Attachments U, V, and W. BIG is located along the southeastern edge of the historic range for Mohave ground squirrel. Live trapping was conducted in 2022 as well as 2025 and results were negative for Mohave ground squirrel. The Biological Resource Technical Report concludes that Mohave ground squirrel is absent from the project site, and the project site is outside of the current known range of the species, as supported by recent studies within the project vicinity. A thorough discussion of these studies is provided in Attachment W to **Draft EIR Appendix 5.4 BIG-1**. As discussed in the Biological Resources Technical Report, recent scientific literature and regional trapping efforts provide evidence that the historical range of Mohave ground squirrel has shifted and decreased, and that BIG is outside of the

current range of the species. The closest known core population of Mohave ground squirrel is approximately 30 miles to the west, and regional trapping efforts and historical data reveal that the closest known confirmed occurrences of Mohave ground squirrel do not occur within BIG or the immediate surrounding areas (Leitner, 2021). Due to the limited range of the species, which does not include the project site, additional live trapping efforts are not required as there would be no impact as substantiated by the analysis provided in the Biological Resources Technical Report.

S8-72 Based on the lack of documented occurrences of Mohave ground squirrel within and in the vicinity of BIG (**Response S8-71**), Mohave ground squirrel is considered absent from the BIG footprint. Therefore, no impacts on Mohave ground squirrel are anticipated and mitigation measures for the species are not necessary. Mitigation measures are only necessary under CEQA for potential impacts that have been identified as reasonably foreseeable to occur. (State CEQA Guidelines Section 15126.4(a)(3) [mitigation measures are not required for effects that are found not to be significant].) Therefore, the new mitigation measure recommended by CDFW in this comment is not warranted. Because the proposed mitigation measure does not, based on substantial evidence, clearly lessen BIG's significant environmental impacts, not including it in the EIR does not trigger the need to recirculate under State CEQA Guidelines § 15088.

S8-73 This comment is consistent with the biological resources analysis discussed in the Draft EIR.

S8-74 See **Response S8-75**.

S8-75 See **Draft EIR Appendix 5.4 BIG-1 Section 5.0: Environmental Setting,** the potential for occurrence within the project site was assessed as low. Therefore, preconstruction surveys were not deemed necessary to avoid impacts on the species. Avoidance of impacts on special-status wildlife species would occur with the implementation of construction best management practices (**MM BIG BIO-12**), if special-status species are present. However, the City and BIG Project proponent recognizes that ringtails are Fully Protect under Fish and Game Code, prohibiting take. Revisions to **MM BIG BIO-26** have been made based on CDFW's recommendations.

Draft EIR Section 5.4 (pages 5.4-91 and 5.4-92) **MM BIG BIO-26** is revised in the **Final EIR Section 3.0: Errata to the Draft EIR**, as follows:

MM BIG BIO-26 **Ringtail, American Badger and Desert Kit Fox Construction Requirements.** "Prior to start of construction mobilization activities within suitable habitat, biological monitors familiar with ringtail, American badger and desert kit fox shall conduct surveys within the limits of the BIG construction footprint for occupied ~~natal~~ dens. The survey(s) shall occur no more than 48 hours prior to start of ground-disturbing activities in suitable habitat for ringtail, American badger, and desert kit fox within the potential impact footprint. Survey results shall be provided to CDFW and the City.

If ringtail, American badger or desert kit fox ~~natal~~ dens are documented within the survey area, a biological monitor shall establish a no-work exclusion buffer around the den and

~~natal~~ dens shall not be disturbed until a biological monitor verifies through noninvasive methods that either the den is no longer occupied, or that juveniles from a ~~the~~ natal den are foraging independently and capable of independent survival and not dependent on the den.

A biological monitor shall monitor the ~~natal~~ den during construction activities approximately every other day if it is a natal den or weekly otherwise. The definitive frequency and duration of monitoring shall be dependent upon the age and behavior of the ringtail, American badger, or desert kit fox pups and the efficacy of the exclusion buffers, as determined by a designated biologist or biological monitor and in coordination with CDFW. Passive relocation methods may be employed for non-natal dens that cannot be avoided by construction activities. For individual, non-natal badger and kit fox dens, a plan for passive relocation, burrow monitoring, and excavation of vacated burrows would be developed in coordination with CDFW.

These changes to **MM BIG BIO-26** only clarifies the measure included in the Draft EIR, and the conclusions of the Draft EIR remain valid. Also see **Consolidated Response 03** concerning the recirculation of the Draft EIR.

S8-76 The City accepts the recommended changes to **MM BIG BIO-20**. **MM BIG BIO-20** (pages 5.4-84 and 5.4-85) is revised in the **Final EIR Section 3.0: Errata to the Draft EIR** as follows:

MM BIG BIO-20 Swainson's Hawk Construction Requirements. Swainson's hawk nest surveys shall be conducted during the breeding season immediately prior to start of construction and provided to the City and CDFW ~~for the breeding season immediately prior to start of construction~~. Surveys shall be conducted within the ~~annual~~ area of BIG construction footprint plus a 0.5-mile buffer by agency-approved Species-Specific biological monitors following the protocol outlined in the Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley (Swainson's Hawk Technical Advisory Committee, 2000). The Species-Specific biological monitor shall be familiar with Swainson's hawk identification and life history and be approved to conduct surveys by CDFW.

If active Swainson's hawk nests are found during nest surveys, the Species-Specific biological monitor shall establish an appropriate avoidance buffer around each nest in consultation with CDFW based on work activities proposed. The avoidance buffer would remain in place until a Species-Specific biological monitor confirms that the Swainson's hawk young have fledged or the nest is no longer active. If full avoidance of active Swainson's hawk nest(s) cannot be achieved, the Project Proponent shall obtain an ITP.

These changes to **MM BIG BIO-20** only clarifies the measure included in the Draft EIR, and the conclusions of the Draft EIR remain valid. Also see **Consolidated Response 03** concerning the recirculation of the Draft EIR.

S8-77 See **Response S8-78**.

S8-78 **MM BIG BIO-27** takes special care to consider avoidance and minimization of impacts on special-status bat species and maternity roosts, if present, in accordance with their sensitivity under CEQA. The City and BIG Project proponent recognizes that bat species are protected under California Fish and Game Code section 4150; however, with implementation of **MM BIG BIO-2, MM BIG BIO-3, MM BIG BIO-9,** and **MM BIG BIO-27** impacts on all bat species and maternity or nursery roosts would be reduced to a level of less than significant. Surveys required by **MM BIG BIO-27** would detect all bat species, and maternity roost detection and avoidance measures are already included in the measure. BIG is required to follow the Fish and Game Code, and added mitigation is not necessary to reinforce legal compliance. If bats are detected and cannot be avoided, a Bat Avoidance and Mitigation Plan is required that is developed in coordination with CDFW. Accordingly, the recommended revisions to **MM BIG BIO-27** are not warranted.

S8-79 This comment is consistent with the biological resources analyses or avoidance, minimization, and mitigation measures discussed in the Draft EIR. However, it should be noted that the conservation easement would be an approximate 500-acre area adjacent to the Mojave River (as opposed to 500 feet on either side).

S8-80 The City and BIG Project proponent recognizes that American beaver is a protected furbearer and **MM BIG BIO-25** is included in the Draft EIR to avoid impacts to individuals accordingly. However, the inclusion of a 3:1 habitat compensation ratio for American beaver as recommended by this comment is unprecedented. CDFW may require habitat mitigation for species listed under CESA for which an incidental take permit is required as CESA extends the take definition to habitats for listed species; however, the American beaver is not subject to CESA and its broader take definition. Avoidance of take of individuals is all that is required by Fish and Game Code § 4000. These protections do not extend to habitat and therefore there is no legal basis or CEQA precedent for requiring habitat replacement for a protected fur bearer. The City and BIG Project proponent accepts CDFW's other recommended changes to **MM BIG BIO-25** to provide additional clarification. **MM BIG BIO-25** (pages 5.4-90 and 5.4-91) is revised in the Final EIR, as follows:

> **MM BIG BIO-25** **Dry Season Construction.** Construction within the Mojave River corridor shall be restricted to the dry season when there are no observable surface flows within 1,000 feet of the BIG construction footprint, to the extent feasible.
>
> If construction must occur outside of the dry season, biological monitors shall conduct daily pre-construction sweeps within 250 feet of direct impact areas occurring within the Mojave River corridor, such as construction associated with the Hinkley Road Bridge. If American beaver is observed, construction cannot be initiated until the species is able to disperse from the area. Construction activities may resume after a biological monitor confirms American beaver is no longer present within direct and indirect impact areas. If impacts to American beaver are unavoidable, the Project Proponents shall not commence Project activities at the locations where American beaver are found and contact CDFW immediately within 24 hours to discuss proper avoidance, minimization, and mitigation.

These changes to **MM BIG BIO-25** only clarifies the measure included in the Draft EIR, and the conclusions of the Draft EIR remain valid. Also see **Consolidated Response 03** concerning the recirculation of the Draft EIR.

S8-81 "Rare, sensitive" and "other native plants identified by CDFW and CNPS" are not clearly defined in the comment however, BIG was surveyed extensively for sensitive plant species with potential to occur on site as identified in **Draft EIR Appendix 5.4 BIG-1** during the target species blooming periods. Survey methods, findings, and impact analyses are described in **Draft EIR Appendix 5.4 BIG-1 Section 4.0: Methods for Evaluating Effects Section 5.0: Environmental Setting,** and **Section 6.0: Impact Analysis.** The only sensitive plant species documented on site (besides Western Joshua tree that is addressed separately) were Mohave fish-hook cactus and Mojave indigo bush. These two species are regulated by the Desert Native Plants Act (DNPA) and County Code as discussed in the Biological Resources Technical Report and **MM BIG BIO-37** already applies to these species accordingly. Therefore, additional of the status language to this measure is not warranted. It is understood that CDFW would like to review the desert native plant salvage plan as a responsible agency and that recommended revision to **MM BIG BIO-37** is accepted.

MM BIG BIO-37 (page 5.4-70) is revised in the Final EIR, as follows:

> **MM BIG BIO-37 Desert Native Plant Salvage Plan.** Prior to start of construction mobilization activities, the implementing entity shall prepare a Desert Native Plant Salvage Plan for the removal of any plant species regulated under the CDNPA and County Code § 88.01.060. Adequate mitigation for CDNPA/County-protected and rare and sensitive plants may include the salvage of plants for translocation to a suitable recipient site if removal cannot be avoided. In the case of translocation, the Desert Native Plant Salvage Plan shall be prepared for review and approval by the City and CDFW. The plan shall include a description and map showing plants to be salvaged, salvage and transport methods, the proposed recipient site, and disposition of the plant specimens at the recipient site. Recipient sites may include existing conservation areas, botanical preserves, museums and zoological societies, among other conservation organizations that provide adequate habitat and management of desert native plants.

These changes to **MM BIG BIO-37** only clarifies the measure included in the Draft EIR, and the conclusions of the Draft EIR remain valid. Also see **Consolidated Response 03** concerning the recirculation of the Draft EIR.

S8-82 This comment provides recommended edits to the mitigation measure for aquatic resources. The suggestion to add "no less than" prior to the 1:1 ratio proposed for aquatic resources is redundant as the language currently states a minimum compensatory ratio of 1:1 would be required. We utilize "in consultation with" as opposed to "[determined] by" the agencies to give more consideration to the negotiation process. A lead agency must determine a minimum requirement as part of the CEQA process even though there may be additional requirements as part of the permitting with specific regulatory agencies. Because the proposed changes to the mitigation measure does not, based on substantial evidence, clearly

lessen BIG's significant environmental impacts, not including these revisions in the EIR does not trigger the need to recirculate under State CEQA Guidelines § 15088. Also see **Consolidated Response 03** concerning the recirculation of the Draft EIR.

S8-83 This comment states that information development in environmental impact reports must be incorporated into a database to be used for determinations. It also includes a reminder to report special-status species to the California Natural Diversity Database. This comment is consistent with standard professional practice for consulting biologists and does not raise any specific issues or questions on the environmental analysis provided in the proposed General Plan, Barstow International Gateway Project, or Draft Environmental Impact Report.

S8-84 Comment noted. All applicable filing and assessment fees would be paid. See **Consolidated Response 04** concerning general non-CEQA issues.

S8-85 Comment noted. See **Consolidated Response 04** concerning general non-CEQA issues.

S8-86 This comment does not present any specific environmental concerns. See **Response S8-38** above concerning Figure 1.

S8-87 This comment lists the Attachments included in the S8 Comment Letter. However, Attachment 1, March 25, 2025, CDFW Comment Letter, appears to be excluded from the S8 Comment Letter attachments. The City acknowledges previous receipt of Attachment 1, March 25, 2025, CDFW Comment Letter. This comment does not raise any specific issues or questions on the environmental analysis provided in the Draft EIR for the proposed General Plan or BIG.

S8-88 This comment lists recommended mitigation measures as revised Mitigation Monitoring and Reporting Plan provided as Attachment 2, Mitigation Monitoring and Reporting Plan. Some of the CDFW recommended revisions to mitigation measures have been accepted and would be incorporated into the Final EIR. However, some of the recommended revisions are not warranted or required, as discussed in several of the previous responses to comments. Because these proposed mitigation measures do not, based on substantial evidence, clearly lessen BIG's significant environmental impacts, not including them in the EIR does not trigger the need to recirculate under State CEQA Guidelines § 15088.

LOCAL AGENCY COMMENTS AND RESPONSES

COMMENT LETTER L1

L1

From: Sam Wang <swang1@aqmd.gov>
Sent: Wednesday, December 10, 2025 12:02 PM
To: GeneralPlan@barstowca.org
Subject: Technical Data Request: for the City of Barstow General Plan and Barstow International Gateway Project DEIR
Importance: High

[NOTICE: THIS IS AN EXTERNAL EMAIL]
Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!

Dear Chris Heldreth or City Planning staff,

South Coast AQMD staff received the Notice of Availability/Draft Environmental Impact Report (EIR) for the **City of Barstow General Plan and Barstow International Gateway Project** (SCH No.: 2024020501) According to the Draft EIR, the public comment period starts November 10, 2025 and ends on January 5, 2026.

Upon review of the files provided as part of the public review period, I was able to access the Draft EIR and Appendices via the City's website.

Please provide an electronic copy of any live modeling and emission calculation files (complete data files, not summaries) that were used to quantify the air quality impacts from construction and/or operation of the Proposed Project, as applicable, including the following:

- CalEEMod Input Files (.json files);
- Live EMFAC output files;
- Any emission calculation file(s) (live version of Excel file(s); no PDF) used to calculate the Project's emission sources (i.e., truck operations);
- AERMOD Input and Output files, including AERMOD View file(s) (.isc);
- HARP Input and Output files and/or cancer risk calculation files (live version of Excel file(s); no PDF) used to calculate cancer risk, and chronic and acute hazards from the Project;
- Any other files related to post-processing done outside of AERMOD to calculate pollutant-specific concentrations (if applicable).

L1-1

You may send the above-mentioned files via a Dropbox link, which South Coast AQMD staff may access and download by **12/16/2025**. Without all files and supporting documentation, South Coast AQMD staff will be unable to complete a review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.

Thank you for your assistance. If you have any questions regarding this request, please feel free to contact me.

Regards,
Sam

Sam Wang
Program Supervisor, CEQA IGR
Planning, Rule Development & Implementation
South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765
(909) 396-2649
swang1@aqmd.gov

RESPONSE TO COMMENT LETTER L1, SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD)

L1-1 This comment requests, and provides directions for, electronic copy submission of any live modeling and emission calculation files used to quantify BIG's construction and operational air quality impacts. Air quality modeling files were submitted on November 10, 2025, to the Governor's Office of Land Use and Climate Innovation and are available to the Mojave Desert Air Quality Management District and South Coast Air Quality Management District. Electronic air quality modeling files were also provided to the Mojave Desert Air Quality Management District and South Coast Air Quality Management District, and confirmation that they had been received was provided by the City. Additionally, prior to receipt of electronic copy submissions, the following have been published on the City website and may also be referenced: **Draft EIR Section 5.3: Air Quality**, **Draft EIR Appendix 5.3 GP-1: Air Quality and Greenhouse Gas Emissions Modeling**, **Draft EIR Appendix 5.3 BIG-1: Air Quality Technical Report Parts 1-8**, and **Draft EIR Appendix 5.3 BIG-1 Air Quality Technical Report Parts 9-18.**

COMMENT LETTER L2

L2

Mojave Desert Air Quality Management District
Brad Poiriez, *Executive Director*
14306 Park Avenue, Victorville, CA 92392-2310
760.245.1661 • Fax 760.245.2022
www.MDAQMD.ca.gov • @MDAQMD

December 10, 2025

City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

Subject: Barstow General Plan

To the Planning Commission:

The Mojave Desert Air Quality Management District (District) has reviewed the Barstow General Plan and Barstow International Gateway (BIG) Project Draft Environmental Impact Report (DEIR) November 2025 (main policy document). The following comments are directed at the proposed Barstow General Plan. District review of the BIG Project DEIR analysis components will be sent under separate cover. L2-1

Barstow General Plan Comments The development under the proposed General Plan is projected to generate net emissions that exceed the District regional significance thresholds for volatile organic compounds (VOC), nitrogen oxides (NOx), and carbon monoxide (CO) during both construction and operation phases. L2-2

Key Findings and Impact: L2-3

- Regional Nonattainment: Exceeding MDAQMD thresholds signifies a cumulative contribution to the nonattainment status of the Mojave Desert Air Basin (MDAB). L2-4
- Conflict with Air Quality Management Plans (AQMPs): The proposed General Plan conflicts with existing AQMPs because it could increase the frequency/severity of air quality violations and delay the attainment of Ambient Air Quality Standards (AAQS). L2-5
- Significant and Unavoidable Impacts: Despite the implementation of existing MDAQMD rules, regulations, and proposed Mitigation Measures (MM GP AQ-1 and MM GP AQ-2), the overall regional air quality impacts are determined to be significant and unavoidable. L2-6
- Toxic Air Contaminants (TACs): While individual development projects will be reviewed by MDAQMD to minimize health risks (e.g., meeting the 10 ppm incremental risk threshold), the cumulative effect of the Plan's buildout is acknowledged to contribute to elevated levels of cancer risk in the MDAB.

District comments directed at specific areas of the general plan are as follows;

Land Use:

- New development's necessary infrastructure should include paving roads for developments requiring access via unpaved roads to reduce particulate pollution. L2-7
  - LU 2.5 – *Fiscal Impact of New Development*
  - LU-2.7 – *County Development*

Circulation & Mobility

- CM 1.6 - *Fair Share of Transportation Improvements:* New development's fair share should include paving roads for developments requiring access via unpaved roads. L2-8
- CM 3.2 - *Truck Parking:* Include enforceable truck-idling signage for all heavy-duty trucks limiting idling in accordance with state law to reduce emissions. L2-9

Open Space & Conservation

- OSC 2.4 - *Agricultural Uses and Resources*: Indoor cannabis operations may require MDAQMD permits and Odor Abatement Plans L2-10
- OSC 3.2 - *Pollutant Reduction and Monitoring*: Policy includes coordinating with the MDAQMD to reduce GHG – however this is under CARB authority. The District does not have authority over GHG emissions but is available to help coordinate reductions. L2-11
- OSC 3.3 - *Construction and operations*: Terminology such as "encourage" should be changed to "shall require" in accordance with state mobile requirements to extent feasible and consistent with State regulation. L2-12

Safety:

- Policy S 1.12 - *Wind and Blow Sand*: Coordination with the MDAQMD on any required dust control plan. L2-13
- Policy S 2.9 - *Urban Heat Reduction*: Favor trees with low BVOC values and low Ozone Formation Potential (OFP), limit or restrict plantings of moderate OFP and high OFP species. Low OFP plantings can reduce ozone concentrations, while high BVOC species can contribute to ozone formation in the region. [12]. L2-14

Implementation Plan:

- IMP-LU-2 – *New Development and Fair Share Costs:* New development's necessary infrastructure should include paving roads for developments requiring access via unpaved roads. L2-15
- IMP-S-12 - *Public Health Planning*: The MDAQMD should be listed as a support agency to coordinate with episodes of poor air quality. L2-16
- IMP-OSC-3 - *Indoor Air Quality Improvements*: The MDAQMD does not have jurisdiction over indoor air quality, only ambient (outdoor) air quality. L2-17

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[1] Trees and Air Quality (CARB) – https://ww2.arb.ca.gov/sites/default/files/cap-and-trade/offsets/CARB_2012_trees_and_air_quality.pdf

[2] [2] Desert Southwest Community Tree Guide (USDA Forest Service, list starting on page 56) - https://www.fs.usda.gov/psw/topics/urban_forestry/products/001_cufr542_72dpiDsrtSWCommTreeGd04.pdf

Appendix B. Glossary:

- Air Basin – there are 15 distinct Air Basins in California (not 14 nationally).[3] L2-18
- Air Pollutants – Please clarify that air pollution comes from manmade/anthropogenic (e.g., vehicles, stationary sources, consumer products) and natural/non-anthropogenic sources (e.g., wildfire smoke, volcanic emissions, windblown dust). L2-19
- Air Pollutant Emissions –include PM2.5 with the particulate emissions, and clarify that reactive organic gases contribute to ozone formation. L2-20
- Air Pollution Control District – Replace Air Pollution Control District and APCD with "Air Quality Management District (AQMD)." Regulating "non-vehicular sources" is not entirely accurate. MDAQMD regulates emissions from stationary sources. Suggested definition addition: L2-21
    - "Stationary Source - Any permanently installed (or operating at a fixed, routine, or seasonal location) unit, piece of equipment, article, machine, process, contrivance, or combination thereof, which may emit or control an air contaminant.".
- Ambient Air Quality – Clarify that this refers to *outdoor* air. L2-22
- MDAQMD is not defined in Appendix B. Glossary. L2-23

In summary, the DEIR formally acknowledges that the proposed General Plan will result in significant and unavoidable air quality impacts. Where significant impacts remain despite compliance with the existing regulatory framework, the District concurs with the identification of feasible mitigation measures that have been identified and are recommended to avoid or reduce the Project's potentially significant environmental impacts. L2-24

Thank you for the opportunity to review this planning document. If you have any questions regarding this letter, please contact me at (760) 245-1661, extension 5737, or Alan De Salvio at extension 6726. L2-25

Sincerely,

Brad Poiriez
Executive Director

[3] CARB, Emissions by Air Basin - https://ww2.arb.ca.gov/applications/emissions-air-basin

RESPONSE TO COMMENT LETTER L2, MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT (MDAQMD)

L2-1 Thank you for your comment. While the comment does not raise any issue regarding the Draft EIR, it is provided in the Final EIR for the decision makers.

L2-2 Thank you for your comment. While the comment does not raise any issue regarding the Draft EIR, it is provided in the Final EIR for the decision makers.

L2-3 Thank you for your comment. While the comment does not raise any issue regarding the Draft EIR, it is provided in the Final EIR for the decision makers.

L2-4 Thank you for your comment. While the comment does not raise any issue regarding the Draft EIR, it is provided in the Final EIR for the decision makers.

L2-5 Thank you for your comment. While the comment does not raise any issue regarding the Draft EIR, it is provided in the Final EIR for the decision makers.

L2-6 Thank you for your comment. While the comment does not raise any issue regarding the Draft EIR, it is provided in the Final EIR for the decision makers.

L2-7 MDAQMD comments that a new development's necessary infrastructure should include paving roads where access requires traversing unpaved roads to reduce particulate pollution and relates this to proposed General Plan policies LU-2.5 and LU-2.7. Policy LU-2.5 targets "fair share" fiscal impact of new development for necessary infrastructural improvements, which would include paved roads. Policy LU-2.7 further tasks the City with coordinating with the County to establish and implement "fair share" impact fees related to roadways, infrastructure, and public services. Through these policies, new development will need to include paved roads when fiscally fair. Nonetheless, this comment is noted; Even though no edits to the Draft EIR are warranted, in consideration of this comment, IMP-OSC-4 was added to the General Plan to specifically include paving roads for projects that require access via unpaved roads for fair share impact fees. IMP-OSC-4 reads as follows:

> **IMP-OSC-4 Outdoor air quality improvements**. Establish requirements and improvements that reduce fugitive dust and transportation emissions, such as incorporating fair share contributions of new development for paving roads when they must obtain access through unpaved roads, installing and enforcing truck-idling signage for heavy-duty trucks to limit idling in accordance with state law, and favoring trees with low biogenic volatile organic compounds and low ozone formation potential. Additionally, establish and/or maintain procedures to coordinate with the Mojave Desert Air Quality Management District on matters such as required dust control plans and indoor cannabis operations.
>
> **Lead: Community Services**
> Support: Community Development, Mojave Desert Air Quality Management District
>
> **Related General Plan Content:**
> Policy OSC-3.2 Pollution reduction and monitoring
> Policy OSC-3.3 Construction and operations

Policy OSC-3.4 Fugitive dust emissions
Policy OSC-3.6 Improved outdoor air quality

Related Environmental Justice Topic(s):
Air Quality

Related Barstow Code Content:
N/A

These changes to **IMP-OSC-4** only clarify the measure included in the Draft EIR. The conclusions of the Draft EIR remain valid. Please also see **Consolidated Response 03** concerning recirculation of the draft EIR.

L2-8 MDAQMD comments that, as it relates to Policy CM-1.6, new development's fair share should include paving roads for developments that require access via unpaved roads. While this comment is noted, no edits to the Draft EIR are warranted. Nonetheless, in consideration of this comment, IMP-OSC-4 was added to the General Plan to specifically include paving roads for projects that require access via unpaved roads for fair share impact fees. Please refer to **Response L2-7** for the new IMP-OSC-4.

L2-9 MDAQMD comments that Policy CM-3.2 should include enforceable truck-idling signage for all heavy-duty trucks limiting idling in accordance with state law to reduce emissions. While Policy CM-3.2 does not explicitly require development to include idling limitation signage, all truck operators are required to limit non-essential idling to no more than five minutes in accordance with Chapter 13 of the California Code of Regulations, Sections 2480 and 2485. While this comment is noted, no edits to the Draft EIR are warranted. Nonetheless, in consideration of this comment, IMP-OSC-4 was added to the General Plan to specifically include truck idling signage for fair share impact fees. Please refer to **Response L2-7** for the new IMP-OSC-4.

L2-10 MDAQMD identifies that, as it relates to Policy OSC-2.4, indoor cannabis operations may require MDAQMD permits and odor abatement plans. This comment is noted; no edits to the Draft EIR are warranted.

L2-11 MDAQMD clarifies that while Policy OSC-3.2 includes coordination with MDAQMD to reduce GHG emissions, the regulation of GHG emissions falls under CARB authority rather than the MDAQMD. MDAQMD adds that they are available to help coordinate GHG emissions reductions. This comment is noted; no edits to the Draft EIR are warranted.

L2-12 MDAQMD comments that the language in Policy OSC-3.3 be changed from "encourage" to "shall require" in accordance with state mobile requirements to the extent feasible and consistent with state regulation. Specifically, Policy OSC-3.3 states, "Encourage City contractors and other builders and developers to use low-emission construction vehicles and equipment to improve air quality and reduce emissions." City contractors and other builders and developers would be required to comply with existing mobile equipment and vehicle emissions regulations promulgated and enforced by the state, thus, adding a requirement for

compliance with state mobile requirements would not add any benefits. This comment is noted; no edits to the Draft EIR are warranted.

L2-13 MDAQMD identifies that coordination with MDAQMD would be necessary on any required dust control plan. While this comment is noted, no edits to the Draft EIR are warranted. Nonetheless, in consideration of this comment, IMP-OSC-4 was added to the General Plan to specifically include coordination with MDAQMD for required dust control plans. See **Response L2-7** for the new IMP-OSC-4.

L2-14 MDAQMD comments that, with respect to Policy S-2.9, the City should favor trees with low BVOC values and low Ozone Formation Potential (OFP) and limit or restrict plantings of moderate OFP and high OFP species. MDAQMD clarifies that low OFP plantings can reduce ozone concentrations while high BVOC species can contribute to ozone formation in the region. While this comment is noted, no edits to the Draft EIR are warranted. Nonetheless, in consideration of this comment, IMP-OSC-4 was added to the General Plan to specifically include preference for low BVOC and low OFP trees. See **Response L2-7** for the new IMP-OSC-4.

L2-15 MDAQMD comments that, as it relates to Implementation Policy IMP-LU-2, new development's fair share should include paving roads for developments requiring access via unpaved roads. This comment is noted; no edits to the Draft EIR are warranted. However, in consideration of this comment, IMP-OSC-4 was added to the General Plan to specifically include paving roads for projects that require access via unpaved roads for fair share impact fees. See **Response L2-7** for the new IMP-OSC-4.

L2-16 MDAQMD comments that MDAQMD should be listed as a support agency to coordinate with episodes of poor air quality in IMP-S-12. While, this comment is noted; no edits to the Draft EIR are warranted. Nonetheless, in consideration of this comment, MDAQMD has been added to IMP-S-12 as a support agency.

These changes to IMP-S-12 only clarify the measure included in the Draft EIR. The conclusions of the Draft EIR remain valid. Also see **Consolidated Response 03** concerning recirculation of the Draft EIR.

L2-17 MDAQMD clarifies that MDAQMD does not have jurisdiction over indoor air quality. This comment is noted; no edits to the Draft EIR are warranted.

L2-18 The updates below are made to the identified terms in **Draft EIR Appendix 3-1: Proposed General Plan, Appendix B: Glossary** (page B-2) to improve clarity and align with the policies and priorities of the MDAQMD and are also included in the **Final EIR Section 3.0: Errata to the Draft EIR**.

> **Air basin**. One of the ~~14~~ 15 self-contained regions in the United States, minimally influenced by air quality in contiguous regions. Barstow is located in the Mojave Desert Air Basin.

These changes to **General Plan Appendix B** only clarify the General Plan. The Draft EIR conclusions remain valid. Also see **Consolidated Response 03** concerning recirculation of the Draft EIR.

L2-19 The updates below are made to the identified terms in **Draft EIR Appendix 3-1: Proposed General Plan, Appendix B: Glossary** (page B-2) to improve clarity and align with the policies and priorities of the MDAQMD and are also included in the **Final EIR Section 3.0: Errata to the Draft EIR** and as follows:

> **Air pollutants**. Any airborne substance generated from manmade/anthropogenic sources (e.g., vehicles, stationary sources, consumer products) and natural/non-anthropomorphic sources (e.g., wildfire smoke, volcanic emissions, windblown dust) that could, in high enough concentration, harm animals, humans, vegetation, and/or materials. With respect to circulation, air pollutants fall into two main groups: (1) those emitted from identifiable sources (such as vehicles) and, (2) those formed in the air by interaction between pollutants and weather conditions.

These changes to General Plan Appendix B. The Draft EIR conclusions remain valid. Also see **Consolidated Response 03** concerning recirculation of the Draft EIR.

L2-20 The updates below are made to the identified terms in **Draft EIR Appendix 3-1: Proposed General Plan, Appendix B: Glossary** to improve clarity and align with the policies and priorities of the MDAQMD and are also included in the **Final EIR Section 3.0: Errata to the Draft EIR.**

> **Air pollutant emissions**. Discharges into the atmosphere, usually specified in terms of weight per unit of time for a given pollutant. The Mojave Desert Air Quality Management District has identified primary pollutants including carbon monoxide, nitrogen dioxide, particulates (PM10 and PM2.5), reactive organic gases, and sulfur dioxide.

These changes to Appendix B only clarify the General Plan. The conclusions of the Draft EIR remain valid. Also see **Consolidated Response 03** concerning recirculation of the draft EIR.

L2-21 The updates below are made to the identified terms in **Draft EIR Appendix 3-1: Proposed General Plan, Appendix B: Glossary** to improve clarity and align with the policies and priorities of the MDAQMD and are also included in the **Final EIR Section 3.0: Errata to the Draft EIR.**

> ~~**Air pollution control district (APCD)**~~**. Air Quality Management District (AQMD).** A single- or multi-county agency with legislative authority to adopt and enforce all rules and regulations necessary to control ~~non-vehicular~~ stationary sources of air pollutants in its area. The Mojave Desert Air Quality Management District (MDAQMD) is the designated APCD AQMD for the Mojave Desert Air Basin.
>
> …

> **Stationary source.** Any permanently installed (or operating at a fixed, routine, or seasonal location) unit, piece of equipment, article, machine, process, contrivance, or combination thereof, which may emit or control an air contaminant.

These changes to Appendix B only clarify the General Plan. The conclusions of the Draft EIR remain valid. Also see **Consolidated Response 03** concerning recirculation of the draft EIR.

L2-22 The updates below are made to the identified terms in **Draft EIR Appendix 3-1: Proposed General Plan, Appendix B: Glossary** to improve clarity and align with the policies and priorities of the MDAQMD and are also included in the **Final EIR Section 3.0: Errata to the Draft EIR**.

> **Ambient air quality**. The quality of the outdoor air at a particular time and place.

These changes to General Plan Appendix B only clarify the General Plan. The conclusions of the Draft EIR remain valid. Also see **Consolidated Response 03** concerning recirculation of the draft EIR.

L2-23 The updates below are made to the identified terms in **Draft EIR Appendix 3-1: Proposed General Plan, Appendix B: Glossary** to improve clarity and align with the policies and priorities of the MDAQMD and are also included in the **Final EIR Section 3.0: Errata to the Draft EIR**.

> **Mojave Desert Air Quality Management District (MDAQMD).** The MDAQMD is the designated AQMD for the portions of the Mojave Desert Air Basin within San Bernardino and Riverside Counties.

These changes to General Plan Appendix B only clarify the General Plan. The conclusions of the Draft EIR remain valid. Also see **Consolidated Response 03** concerning recirculation of the draft EIR.

L2-24 Thank you for your comment. While the comment does not raise any issue regarding the Draft EIR, it is provided in the Final EIR for the decision makers.

L2-25 Thank you for your comment. While the comment does not raise any issue regarding the Draft EIR, it is provided in the Final EIR for the decision makers.

COMMENT LETTER L3

L3

Mojave Desert Air Quality Management District
Brad Poiriez, *Executive Director*
14306 Park Avenue, Victorville, CA 92392-2310
760.245.1661 • Fax 760.245.2022
www.MDAQMD.ca.gov • @MDAQMD

December 10, 2025

City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

Subject: MDAQMD Comments on the BNSF BIG Project DEIR

To the Planning Commission:

The Mojave Desert Air Quality Management District (District) has received the Draft Environmental Impact Report (DEIR). for the proposed Barstow International Gateway Project. The BIG Specific Plan consists of a rail yard, a transload warehouse center, and a private utility (i.e., a solar farm). The rail yard would include a block swap yard, an intermodal facility, and ancillary rail areas (container yard, chassis storage, and maintenance of way). To serve the proposed rail yard and transload warehouse center, BIG proposes approximately 660 acres of various off-site rail and non-rail improvements (e.g., lead track extensions, drainage, utilities, and roadways). The total BIG footprint is approximately 5,000 acres and would operate 24 hours per day, 365 days per year. L3-1

Barstow International Gateway DEIR Comments
The District noted several errors in the Draft EIR that should corrected in the Final EIR:

- MM BIG AQ-9: *Truck Idling* – telephone number should be for the MDAQMD, not the SCAQMD for reporting violations. L3-2
- The MDAQMD operates 5 monitoring stations, not 6 (Air Quality Analysis, pg. 15). The Phelan station has been decommissioned. L3-3
- Figures 5.3-3 and 5.3-13 show sensitive receptors within the BIG project boundaries. The final EIR should ensure all sensitive receptors are in the correct locations and contours should be visible through receptor areas. L3-4

District Requirements

The District recommends that the City requires the owner/operator obtain a Dust Control Plan (DCP) for the project. The most current Dust Control Plan Requirements and Dust Control Plan Submission Form are available at: https://www.mdaqmd.ca.gov/permitting/compliance-forms. Please note the Solar Dust Control Plan fee schedule located in Table 1 of Rule 302. L3-5

Additionally, the District will require:

- Signage compliant with Rule 403 Attachment B shall be erected at each project site entrance not later than the commencement of construction.
- Use a water truck to maintain moist disturbed surfaces and actively spread water during visible dusting episodes to minimize visible fugitive dust emissions. For projects with exposed sand or fines deposits (and for projects that expose such soils through earthmoving), chemical L3-6

stabilization or covering with a stabilizing layer of gravel will be required to eliminate visible dust/sand from sand/fines deposits.

- All maintenance and access vehicular roads and parking areas shall be stabilized with chemical, gravel or asphaltic pavement sufficient to eliminate visible fugitive dust from vehicular travel and wind erosion. Take actions to prevent project-related trackout onto paved surfaces, and clean any project-related trackout within 24 hours. All other earthen surfaces within the project area shall be stabilized by natural or irrigated vegetation, compaction, chemical or other means sufficient to prohibit visible fugitive dust from wind erosion.
- Comply with all applicable provisions listed in Rule 403 – *Fugitive Dust Control*.
- An asbestos checklist is required for any demolition or renovation of existing buildings or infrastructure. MDAQMD asbestos informational flowchart and notification forms are available at https://www.mdaqmd.ca.gov/permitting/asbestos-information.
- Permits for the concrete plants and asphalt plant (PERP not valid as the equipment will reside onsite for more than 12 months will require an ATC/PTO from MDAQMD.
- Obtain District permits for any miscellaneous process equipment that may not be exempt under District Rule 219 including, but not limited to: Internal Combustion Engines with a manufacture's maximum continuous rating greater than or equal to 50 brake horsepower; fuel storage and dispensing equipment.

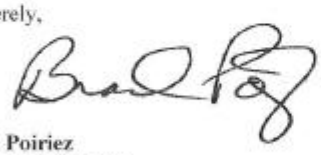
L3-6 cont.

The District concurs with the analysis and findings for the BIG project as presented in the draft EIR, including the use of all feasible mitigation and that the project remains significant after all identified feasible mitigation. The project will result in dramatic overall air quality improvement by directly reducing upwind emissions, improving the job/housing balance within the District, and reducing traffic pressure on the critical Cajon Pass Interstate 15 heavy duty truck and passenger corridor. The majority of emissions contributing to the significance of this project are Federal sources (locomotive and heavy-duty truck emissions) which the District has no authority over.

L3-7

Thank you for the opportunity to review this planning document. If you have any questions regarding this letter, please contact me at (760) 245-1661, extension 5737, or Alan De Salvio at extension 6726.

Sincerely,



Brad Poiriez
Executive Director

Ltr BNSF BIG Project CEQA CMT 2025

RESPONSE TO COMMENT LETTER L3, MDAQMD

The City acknowledges MDAQMD's role as a Responsible Agency and its ability to exercise its own judgment regarding the Final EIR's adequacy in accordance with State CEQA Guidelines § 15096(e). A discussion related to MDAQMD's jurisdiction relevant to BIG is included in **Draft EIR Section 3.0: Project Description** and **Draft EIR Sections 5.1** through **5.17**, as appropriate. The anticipated MDAQMD approvals are listed in **Draft EIR Table 3-16: Proposed General Plan Permits and Approvals** (page 3-92) and **Table 3-17: BIG Permits and Approvals** (page 3-93). Per CEQA, a responsible agency should provide substantive comments, supported by specific documentation, regarding those project activities within an area of expertise of the agency or that are required to be carried out or approved by the agency. (Pub. Resources Code, § 21153(c).) Consistent with this, the City has carefully reviewed MDAQMD's comments on the Draft EIR and, where necessary, revised the EIR accordingly, except as otherwise explained in the responses to comments below.

L3-1 This comment includes a summary of BIG and does not raise an environmental issue or a substantive issue on the content of the Draft EIR. Responses to the comments contained in this letter are provided below **in Responses L3-2** through **L3-6**. See also **Consolidated Response 04** concerning general non-CEQA issues.

L3-2 The comment requests that **MM BIG AQ-9** include the phone number for MDAQMD for the reporting of violations. As shown on **Draft EIR Section 5.3: Air Quality** (page 5.3-107), first bullet, **MM BIG AQ-9** requires "telephone numbers of the building facilities manager, the Mojave Desert AQMD, and CARB to report violations". **MM BIG AQ-9** correctly requires the inclusion of MDAQMD telephone numbers on posted signage for the reporting of truck idling violations. No revisions are necessary**.**

L3-3 This comment calls attention to a typographical error in the **Draft EIR Section 5.3: Air Quality**. **Draft EIR Section 5.3** (page 5.3-15) has been revised as shown below and as shown in **Final EIR Section 3.0: Errata to the Draft EIR.**

> The MDAQMD operates and maintains <u>five</u> ~~six~~ monitoring stations (Barstow, Hesperia, ~~Phelan,~~ Trona, Twentynine Palms, and Victorville) in its 20,000-square-mile jurisdiction.

L3-4 The comment points out that **Draft EIR Figure 5.3-3: Centroid, Coarse, and Fine Receptor Grids - BIG** (page 45) and **Figure 5.3-13: Operations Health Risk Assessment – BIG and East Leads (Mitigated)** (page 5.3-150) show sensitive receptors within the BIG footprint.

As indicated in the legend for **Draft EIR Figure 5.3-3** (page 45), sensitive receptors are shown as yellow points labeled "Fine Grid Receptors." The red points, labeled "Coarse Grid Receptors," do not represent discrete sensitive receptors. Instead, they depict a modeling grid across the BIG study area that was used to generate the contour data presented in **Draft EIR Figure 5.3-5: Construction Mitigated 24-Hour PM10 Pollutant Concentration** through **Figure 5.3-21: Combined Construction and Operational Health Risk Assessment – East of BIG (Mitigated)** (pages 5.3-127 to 5.3-158). Due to BIG purchasing residences within the footprint, there are no sensitive receptors within the footprint. No revisions are required.

L3-5 The comment recommends that a Dust Control Plan for BIG be obtained and provides the location where the most current Dust Control Plan Submission Form can be found. BIG would comply with the MDAQMD's rules and regulations, including preparation of a Dust Control Plan, as specified in **LOR AQ-1**. The comment does not raise an environmental issue or a substantive issue on the content of the Draft EIR; therefore, no further response is required. See **Response L3-6** concerning dust control plans.

L3-6 This comment lists requirements related to fugitive dust control, asbestos removal, and permitting of equipment.

As shown on Draft EIR page 5.3-104, **MM BIG AQ-1** requires the preparation of a fugitive dust control plan that complies with MDAQMD Rule 403. Required measures includes watering unpaved road surfaces, limiting vehicle travel speed on unpaved roads to 25 miles per hour, reducing non-essential dust-generating activities when average wind speed exceeds 25 mph, stabilizing disturbed surface areas, and wetting of all exterior surfaces of buildings up to 6 stories in height during demolition.

An asbestos checklist would be prepared for any demolition or renovation of existing buildings performed under BIG and all requirements would be adhered to and the appropriate permits required for the operation of concrete plants, asphalt plants, and miscellaneous process equipment would be obtained. This comment does not raise an issue regarding the adequacy of the analysis contained in the Draft EIR; therefore, no further response is required.

L3-7 This comment provides the District's concurrence with the analysis and findings for BIG, as presented in the Draft EIR. This comment does not raise an issue regarding the adequacy of the analysis contained in the Draft EIR; therefore, no further response is required.

COMMENT LETTER L4

L4

REQUEST: Comment Period Extension

Michael Krause <MKrause@aqmd.gov>

Thu 12/11/2025 3:40 PM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

Cc:Barbara Radlein <bradlein@aqmd.gov>; Sam Wang <swang1@aqmd.gov>;

1 attachments (155 KB)

SCAQMD Request - BIG project.pdf;

[NOTICE: THIS IS AN EXTERNAL EMAIL]
Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!

Caution! This message was sent from outside your organization.

Hi Chris,

Please see attached request for an extension on the DEIR comment period. This is an important project and we want to ensure we have the time to properly review. We look forward to your response. L4-1

Mike

Michael A. Krause
Assistant Deputy Executive Officer
Planning, Rule Development & Implementation
South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765
(909) 396-2706 office
(909) 582-5125 work cell
mkrause@aqmd.gov

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

December 11, 2025

Chris Heldreth
Community Development Director
City of Barstow
220 East Mountain View Street, Suite A
Barstow, California 92311
generalplan@barstowca.org

Sent via email

Re: Comment Extension Request—BNSF Barstow International Gateway Railyard Draft Environmental Impact Report SCH No. 2024020501

Dear Mr. Heldreth:

The South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the BNSF Barstow International Gateway (BIG) Railyard Draft Environmental Impact Report (DEIR). However, we write to request a minimum of 45 additional days to comment on the DEIR due to the document's length and complexity and the intervening holidays. As you are aware, the DEIR was public on November 10 and currently public comment will close on January 5. We ask that the due date for comments be extended to February 19, 2026 or later. L4-1

As you are aware, South Coast AQMD is a regional air quality management district with jurisdiction over all or major parts of Los Angeles, Orange, Riverside, and San Bernardino counties (South Coast Air Basin). It is charged with improving air quality in the Basin to comply with state and federal laws and protect the health of Basin residents. As the DEIR acknowledges, trains traveling to the proposed BIG railyard would necessarily traverse the Basin. As a result, South Coast AQMD has a significant interest in reviewing the DEIR's analysis of potential air quality impacts. L4-2

South Coast AQMD's review of the DEIR will require substantial time from South Coast AQMD staff, as the air quality analysis involves numerous assumptions and complex modeling. We appreciate that BNSF's consultant has agreed to go over some of this analysis with our staff. However, given the length of the document (nearly 2,000 pages excluding appendices), complexity of the air quality issue, potential for significant air quality impacts in the Basin, and numerous major holidays falling within the comment period, South Coast AQMD requests that the comment period be extended to February 19, 2026 or later. L4-3 L4-4

Chris Heldreth December 11, 2025

Please let us know as soon as possible if the comment deadline is extended. Contact me at mkrause@aqmd.gov, or via phone at (909) 396-2706 if you have any questions. L4-5

Sincerely,

Michael Krause
Assistant Deputy Executive Officer
Planning, Rule Development & Implementation

RESPONSE TO COMMENT LETTER L4, SCAQMD

L4-1 See **Consolidated Response 01-02** concerning the Draft EIR's public review period. As the Lead Agency, the City appreciates South Coast AQMD's engagement and professional review of the Draft EIR. The public review period for the Draft EIR was extended per the request of SCAQMD and other commenters.

L4-2 The City acknowledges South Coast AQMD's jurisdictional role and expertise in air quality and public health matters within the South Coast Air Basin. The Draft EIR's air quality, health risk, and related analyses were prepared to address potential impacts within affected air basins and to inform responsible agencies, decision makers, and the public. The City welcomes South Coast AQMD's comments submitted within the established public review period and would consider all substantive input in preparing the Final EIR, consistent with State CEQA requirements.

L4-3 The City recognizes the technical complexity associated with air quality and health risk analyses and appreciates South Coast AQMD's professional engagement on these issues. The Project's consultants were available to provide clarification regarding modeling approaches, assumptions, and methodologies during the public review period. Examples of cooperation and coordination are documented in the administrative record for the Project. Representatives for the Project also met with SCAQMD on December 12, 2025. All written comments submitted by South Coast AQMD by the close of the noticed comment period would be addressed in the Final EIR in accordance with CEQA.

L4-4 See **Response L4-1**.

L4-5 This comment provides concluding remarks. See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER L6

L6

Helendale Community Services District

26540 Vista Road, Ste.B - P.O. Box 359
Helendale, California 92342-0359
(760) 951-0006 Fax (760) 951-0046

December 16, 2025

City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

RE: Barstow International Gateway (BIG) DEIR

To Whom It May Concern:

Public safety is of paramount importance to our communities. As a small rural community of 6500 residents, we are concerned about the challenges encumbered upon us by the BIG project. While the DEIR seemed thorough in discussing a plethora of considerations for the Barstow community it did not acknowledge the major implications this project will have on the Helendale community including movement across the tracks as well as medical and public safety. The main form of ingress and egress from the Silver Lakes community in Helendale is Vista Road across the railroad tracks to National Trails Highway. Given the fact that Helendale is currently negatively impacted by rail movement it is a certainty that there will be an even greater threat to this main thoroughfare once the project is constructed. The two primary concerns are adequate ingress/egress from the community and public safety access. L6-1

INGRESS/EGRESS:
In review of the DEIR it is noted that major mainline rail improvements will be a part of the project as described on page 3-45, including improvements to roadway, bridges and the addition of 13 miles of mainline track. Further section 3.8.5 (pg 3-89) describes the methodology for these expanded facilities. It is noted that three bridges will be constructed over the Lenwood Channel. Since BNSF is already constructing bridges as part of the project, it should also be required to construct a bridge in Helendale to assist the most densely populated and impacted community with safe unfettered access to National Trails Highway. L6-2

County Policy Plan as noted on page 5-11-9 in Table 5.11.1 goal TM-1 states that unincorporated areas are to be served by roads with capacity adequate for residents, businesses, tourists, and emergency services. Failure to provide adequate ingress and egress over or around the railroad tracks is in violation of County's policy. Further Policy TM1.7 states that County requires new development to pay its fair share contribution toward off-site transportation improvements. We L6-3 L6-4

would assert that a railroad overcrossing should be required to avoid significant delays to the residents and emergency personnel. Lastly, Policy TM-5.4 supports "grade separations to reduce conflicts between rail facilities and roadways" and it is reasonable to expect that the BIG project be required to construct such a facility due to the impacts to the Helendale Community. This concept seems to be further substantiated in County Code section 110.0204 stating that "County may exercise any or all of the following power to cause, provide for, or undertake...installation...or construction of infrastructure, including...bridges, arterial streets...". It appears the obligation is clear that the project should include resolving rather than further complicating the matter of ingress and egress for an adjacent community. L6-4 cont. L6-5

The City of Barstow's own Policy CM-1.7 acknowledges the importance of providing "multiple options for vehicles to safely cross...railway facilities." The City is obviously cognizant of the need to provide alternatives for the motoring public. As further stated in the Consistency Analysis that the project "would construct/reconstruct several railway crossings, bridges, and other infrastructure to facilitate the movement of vehicles across the Mojave River and railway facilities. We assert that a railroad overcrossing or alternative roadway in Helendale should be part of the project requirements. L6-6

PUBLIC SAFETY:

In section 5.15-2 a discussion occurs about the Countywide policy entitled "Relevant Transportation Goals and Policies". On Table 5.15-2 (pg 5.15-7) of the policy it describes emergency access with the policy statement as follows: "When considering new roadway improvement proposals for the CIP or RTP, we consider the provision of adequate emergency access routes along with capacity expansion in unincorporated area." This policy would dictate that an alternative means of ingress and egress would be an essential part of the BIG project for public safety.

Public Safety Response is addressed on page 5-14-25, wherein it is stated that the primary station responsible for response to the BIG project is the Helendale Station 4 located on the west side of the tracks within the Silver Lakes subdivision. This is a troublesome proposition as the Helendale community was the first in the county to exercise self-help and adopt an annual tax assessment to fund paramedics on each piece of apparatus to serve the community's needs. The BIG project will place a burden on these resources to the detriment of the Helendale community. It is noted that over time additional Barstow stations will be constructed, however, during the construction phase that will include a large mobilized construction population the burden will be impactful to Helendale. Compared to the closest Barstow Station, Station 4 in Helendale is staffed more adequately with a five person rotating shift and approximately 15 assigned personnel compared to Barstow station 363 with only three staff members. The Paid Call fire station in Hinkley is of minimal consequence to fire response due to limited staffing; therefore, It would be reasonable to state that the preponderance of the fire response burden will be handled by the Helendale Station 4 which is only four miles from the proposed BIG site. The imposition on the Helendale community was not discussed in the DEIR nor were the time delays for life-saving medical intervention mentioned. County will send a unit to backfill a called away unit, but that is subject to availability and there is no guarantee that response will be timely. We see this as a critical life L6-7

and death situation for our residents. At the least, an additional unit and crew should be housed at Station 4 to accommodate the BIG project until Barstow is able to assume primary responsibility.

L6-7 cont.

We would be happy to discuss these concerns with you. Please feel free to contact me should you have any questions regarding this matter.

Kind regards,

Ron Clark
President
Board of Directors

RESPONSE TO COMMENT LETTER L6, HELENDALE COMMUNITY SERVICES DISTRICT

L6-1 Commenter raises some concerns about the Draft EIR's analysis that are best addressed by sharing technical and scientific information, which is provided below. See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning increased rail activity's effects on emergency response delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossing, and **Consolidated Response 10-02** concerning increased rail activity's effects on traffic delays at the Silver Lakes/Helendale Community at-grade crossings.

L6-2 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 08-03** concerning increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning increased rail activity's effects on emergency response delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning increased rail activity's effects on traffic delays at the Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at the Silver Lakes/Helendale Community at-grade crossing.

L6-3 Goal TM-1 (Draft EIR page 5.11-9) is not a regulatory requirement or prohibition. Moreover, the roadway capacity for emergency services referenced in Goal TM-1 speak to the roadway's design, which is concerned with the maximum traffic volume a highway segment/intersection can accommodate during a specific time period (typically an hour) under peak traffic conditions, not emergency response. See **Consolidated Response 10-01** concerning the increased rail activity's effects on delays to emergency access at the Silver Lakes/Helendale Community at-grade crossing.

As discussed in **Draft EIR Appendix 5.15 BIG-2: Level of Service Assessment – Transportation Analysis**, BIG proposes several transportation modifications (TMs) (i.e., transportation improvements) to address forecast operational deficiencies of intersections, roadway segments, and freeway off-ramps, some within County jurisdiction; see **Draft EIR Appendix 5.15 BIG-2 Table 2: Transportation Deficiencies and Proposed Transportation Modifications Summary** (**Draft EIR Appendix 5.15 BIG-2** page 21). Thus, BIG would not conflict with Goal TM-1.

L6-4 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning increased rail activity's

effects on traffic delays at the Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at the Silver Lakes/Helendale Community at-grade crossing. Also see **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 06-01** concerning the geographic scope of the environmental analysis and definition of study area.

BIG's transportation level of service (LOS) assessment study area was determined using the County TIS Guidelines, as discussed in **Draft EIR Appendix 5.15 BIG-2, Section 3.1**. Consistent with the County TIS Guidelines, the transportation LOS study area does not include the Silver Lakes/Helendale Community because BIG is not forecast to add more than 50 peak hour vehicular trips along the roadways near the community. As noted in **Response L6-3** above, BIG proposes several transportation modifications (TMs) (i.e., transportation improvements) to address forecast operational deficiencies of intersections, roadway segments, and freeway off-ramps, some within County jurisdiction. As such, improvements within County jurisdiction would be subject to Countywide Plan (CWP) goals and policies and County Code regulations and standards. BIG would pay its fair share contribution toward off-site transportation improvements within the County Jurisdiction in compliance with CWP Policy TM 1.7.

L6-5 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning increased rail activity's effects on traffic delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at the Silver Lakes/Helendale Community at-grade crossing, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

L6-6 See **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 08-03** concerning increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning increased rail activity's effects on emergency response delays at the Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at the Silver Lakes/Helendale Community at-grade crossing. See **Consolidated Response 05-06** concerning the feasibility of specific technology and other mitigation measures.

L6-7 **Draft EIR Table 5.14 7: Fire Protection Facilities - Proposed General Plan** (page 5.14-25) lists the fire stations that would serve the proposed General Plan area (which includes BIG). See **Consolidated Response 08-03** concerning increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning increased rail activity's effects on emergency response delays at the Silver Lakes/Helendale Community

at-grade crossings, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at the Silver Lakes/Helendale Community at-grade crossing.

Concerning housing an additional unit and crew at Station 4, the proposed General Plan analysis found (**Draft EIR Impact 5.14-1** page 5.14-43) the anticipated growth under the proposed General Plan (inclusive of BIG) would require five BFPD fire stations (two existing; one re-established; and two new), but did not identify the need for additional facilities or staffing at Station 4.

COMMENT LETTER L7

City of Hesperia

Gateway to the High Desert

December 18, 2025

Dear Mayor Silva and Members of the Barstow City Council,

I am writing to express strong support for the BNSF Barstow International Gateway (BIG) Project.

This project offers a tremendous economic opportunity for Barstow and the entire Mojave River Valley/High Desert Region, including the City of Hesperia, that will increase jobs, promote supply chain resiliency, and decrease trucking transport on our local highways resulting in reduced gas emissions. L7-1

BIG would enhance supply chain resiliency, efficiency, and cost-effective goods movement by rail as identified in the 2024 adopted California State Rail Plan to build toward an integrated statewide rail and transit network with investments in zero emission infrastructure. L7-2

BIG would shift cargo from heavy duty trucking to rail transport at a location away from dense population centers and was planned with the City of Barstow as part of the proposed General Plan to site industrial uses on the western edge of the City away from residential uses. L7-3

Over the next 20 years, BIG is anticipated to create approximately 62,000 direct, indirect and induced construction jobs, including union construction jobs and approximately 15,000 direct, indirect, and induced operation jobs. The construction economic benefit is estimated to be approximately $11 billion and operational economic benefit approximately $7 billion. L7-4

BIG would result in hundreds of millions fewer truck miles as a result of converting freight movements from trucks to trains. This substantial reduction in truck trips would in turn result in a net decrease in greenhouse gas emissions. L7-5

In light of these significant benefits to the regional economy, and environment, the City of Hesperia is pleased to express our support of the BNSF BIG project. L7-6

Sincerely,

Rachel Molina
City Manager

Brigit Bennington, Mayor
Josh Pullen, Mayor Pro Tem
Cameron Gregg, Council Member
Allison Lee, Council Member
Chris Ochoa, Council Member

Rachel Molina, City Manager

9700 Seventh Avenue
Hesperia, CA 92345
760-947-1000
TD 760-947-1119

hesperiaca.gov

RESPONSE TO COMMENT LETTER L7, CITY OF HESPERIA

L7-1 through L7-6 Thank you for your comment. See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER L8

Liz Becerra
Mayor

Bob Harriman
Mayor Pro Tem

Tiffany Gaudin
Council Member

Leslie Irving
Council Member

Corrine Mora
Council Member

City of Barstow
Received:
DEC 22 2025
Initial:
City Clerk Services

December 17, 2025

City of Barstow
Attn: Mayor Silva
220 East Mountain View St., Suite A
Barstow, CA 92311

RE: BNSF Barstow International Gateway Project - Support

Dear Mayor Silva and Members of the Barstow City Council:

I am writing to express strong support for the BNSF Barstow International Gateway (BIG) Project. L8-1

This project offers a tremendous economic opportunity for Barstow and the entire High Desert Region that will increase jobs, promote supply chain resiliency, and decrease trucking transport on our local highways resulting in reduced gas emissions.

BIG would enhance supply chain resiliency, efficiency, and cost-effective goods movement by rail as identified in the 2024 adopted California State Rail Plan to build toward an integrated statewide rail and transit network with investments in zero emission infrastructure. L8-2

BIG would shift cargo from heavy duty trucking to rail transport at a location away from dense population centers and was planned with the City of Barstow as part of the proposed General Plan to site industrial uses on the western edge of the City away from residential uses. L8-3

Over the next 20 years, BIG is anticipated to create approximately 62,000 direct, indirect and induced construction jobs, including union construction jobs and approximately 15,000 direct, indirect, and induced operation jobs. The construction economic benefit is estimated to be approximately $11 billion and operational economic benefit approximately $7 billion. L8-4

BIG would result in hundreds of millions fewer truck miles as a result of converting freight movements from trucks to trains. This substantial reduction in truck trips would in turn result in a net decrease in greenhouse gas emissions. L8-5

Sincerely,

Liz Becerra
Mayor

cc: Victorville City Council Members

CITY OF VICTORVILLE
14343 CIVIC DRIVE • P.O. BOX 5001 • VICTORVILLE, CALIFORNIA 92393-5001 • (760) 955-5188 • (760) 269-0011
www.victorvilleca.gov

RESPONSE TO COMMENT LETTER L8, CITY OF VICTORVILLE

L8-1 through L8-5 Thank you for your comment. See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER L9

Victor Valley Wastewater Reclamation Authority
A Joint Powers Authority and Public Agency of the State of California
20111 Shay Road, Victorville, CA 92394
Telephone: (760) 246-8638
Fax: (760) 246-2898
e-mail: mail@vvwra.com

December 19, 2025

To the City of Barstow,

The Victor Valley Wastewater Reclamation Authority (VVWRA) is pleased to express its support for the City of Barstow's General Plan Update and the BIG Project for the region.
As a regional wastewater and recycled water provider serving the High Desert, VVWRA recognizes that thoughtful land use planning, infrastructure investment, and coordinated regional growth are essential to protecting public health, supporting economic development, and ensuring long-term environmental sustainability. The BIG initiative aligns with these objectives by promoting strategic growth that strengthens infrastructure systems, improves mobility, and enhances regional resilience. We understand that the new facility will bring thousands of direct jobs to California's high desert communities, reduce highway and port congestion, maximize rail and distribution efficiency regionally and across the U.S. supply chain, and overall reduce impacts on the environment.

From a regional infrastructure perspective, the projected benefits of the BIG vision are significant. The creation of tens of thousands of construction and long-term operations jobs will strengthen the local workforce and economic base, while increasing revenues that can support essential public services such as fire protection, law enforcement, water, wastewater, and utility infrastructure. These investments are critical to maintaining reliable services as the region grows. The emphasis on major infrastructure improvements, including flood mitigation, bridge upgrades, and safer roadways, is particularly important in the High Desert, where aging systems and climate-related challenges place increasing demands on public agencies. Coordinated planning at the local and regional level allows infrastructure providers like VVWRA to better align capital improvement planning, optimize system performance, and protect sensitive environmental resources. L9-1

Additionally, the BIG vision's focus on cleaner air and reduced pollution through improved freight movement and reduced truck traffic supports regional environmental and public health goals. Reduced congestion and emissions benefit not only air quality but also long-term infrastructure durability and community quality of life.

VVWRA appreciates the City of Barstow's efforts to engage stakeholders and pursue a comprehensive General Plan Update that considers economic vitality, infrastructure capacity, environmental stewardship, and regional collaboration. We believe the BIG vision represents a meaningful opportunity to strengthen connectivity across the High Desert and support sustainable growth for decades to come. As always, VVWRA stands in support of our local communities and remains available to cooperate with the City and the Project.

Thank you for the opportunity to provide this letter of support. VVWRA looks forward to continue our collaboration with the City of Barstow and regional partners as this important planning effort moves forward.
Sincerely,

Darron Poulsen

Darron Poulsen
General Manager, Victor Valley Wastewater Reclamation Authority

RESPONSE TO COMMENT LETTER L9, VICTOR VALLEY WASTEWATER RECLAMATION AUTHORITY (VVWRA)

L9-1 Thank you for your comment. See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER L10

L10

From: Chris Heldreth
To: Colin Drukker; Mark Teague; Matthew Summers; Heidy Riley; Genesis Crank; Amy Sanchez
Subject: FW: Comments on Draft Environmental Impact Report for the City of Barstow General Plan and Barstow International Gateway Project Draft Environmental Impact Report, State Clearinghouse No. 2024020501
Date: Tuesday, December 23, 2025 4:27:38 PM
Attachments: image002.png
image003.png
image004.png
image005.png
image006.png
image001.png
Barstow International Gateway EIR.pdf

FYI

Community Development Director

City of Barstow
Chris Heldreth
760-255-5169
cheldreth@barstowca.org

220 East Mountain View St.
Suite A
Barstow, CA 92311

www.barstowca.org

Learn why Barstow is the perfect place to relocate. Download our marketing materials at www.barstowca.org/government/city-manager/economic-development

From: Lafarga, Ariel@Waterboards <Ariel.Lafarga@Waterboards.ca.gov> **On Behalf Of** Lahontan
Sent: Tuesday, December 23, 2025 3:32 PM
To: Chris Heldreth <cheldreth@barstowca.org>
Cc: state.clearinghouse@opr.ca.gov; askregion6@wildlife.ca.gov
Subject: Comments on Draft Environmental Impact Report for the City of Barstow General Plan and Barstow International Gateway Project Draft Environmental Impact Report, State Clearinghouse No. 2024020501

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Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!

This sender is trusted.

Please see the attached Comments on Draft Environmental Impact Report for the City of Barstow General Plan and Barstow International Gateway Project Draft Environmental Impact Report, State Clearinghouse No. 2024020501.

If you have any questions, please contact Tiffany Steinert. L10-1

Ariel Lafarga
Executive Assistant

R6 LAHONTAN
Victorville Admin

Email: Ariel.Lafarga@Waterboards.ca.gov
Phone: +1 (760) 243-4056

Regional Water Quality Control Boards
15095 Amargosa Road, Building 2 - Suite 210, Victorville CA 92394
Website: www.waterboards.ca.gov

CALIFORNIA Water Boards

GAVIN NEWSOM
GOVERNOR

YANA GARCIA
SECRETARY FOR ENVIRONMENTAL PROTECTION

Lahontan Regional Water Quality Control Board

December 23, 2025

File: Environmental Doc Review
San Bernardino County

Chris Heldreth
City of Barstow
220 East Main Street, Suite A
Barstow, CA 92311
cheldreth@barstowca.org

Comments on Draft Environmental Impact Report for the City of Barstow General Plan and Barstow International Gateway Project Draft Environmental Impact Report, State Clearinghouse No. 2024020501

Lahontan Regional Water Quality Control Board (Water Board) staff received the City of Barstow General Plan and Barstow International Gateway Project Draft Environmental Impact Report Draft Environmental Impact Report (DEIR) on November 10, 2025. The DEIR was prepared by PlaceWorks and Kimley Horn for the City of Barstow (City) and submitted in compliance with provisions of the California Environmental Quality Act (CEQA). Water Board staff, acting as a responsible agency, is providing these comments to specify the scope and content of the environmental information germane to our statutory responsibilities pursuant to CEQA Guidelines, California Code of Regulations (CCR), title 14, section 15096. We encourage the City to take this opportunity to integrate elements into the DEIR that: (1) promote watershed management; (2) support "Low Impact Development" (LID); and (3) reduce the effects of hydromodification. Our comments are outlined below. L10-2

WATER BOARD'S AUTHORITY

All groundwater and surface waters are considered waters of the State. Surface waters include streams, lakes, ponds, and wetlands, and may be ephemeral, intermittent, or perennial. All waters of the State are protected under California law. State law assigns responsibility for protection of water quality in the Lahontan Region to the Lahontan Water Board. Some waters of the State are also waters of the U.S. The Federal Clean Water Act (CWA) provides additional protection for those waters of the State that are also waters of the U.S. L10-3

The *Water Quality Control Plan for the Lahontan Region* (Basin Plan) contains policies that the Water Board uses with other laws and regulations to protect the quality of waters of the

State within the Lahontan Region. The Basin Plan sets forth water quality standards for surface water and groundwater of the Region, which include designated beneficial uses as well as narrative and numerical objectives which must be maintained or attained to protect those uses. The Basin Plan can be accessed via the Water Board's web site at

http://www.waterboards.ca.gov/lahontan/water_issues/programs/basin_plan/references.shtml.

L10-3 cont.

RECOMMENDED ELEMENTS TO INCLUDE IN THE PLAN

We recommend the following be considered in the environmental review.

1. Healthy watersheds are sustainable. Watersheds supply drinking water, provide for recreational uses, and support ecosystems. Watershed processes include the movement of water (e.g. infiltration and surface runoff), the transport of sediment, and the delivery of organic material to surface waters. These processes create and sustain the streams, lakes, wetlands, and other receiving waters of our region.

   The watershed approach for managing water resource quality and quantity is a collaborative process that focuses public and private efforts on the highest priority problems within a drainage basin. The Mojave Integrated Regional Water Management Group has assembled a collaborative group of stakeholders, both public and private, to address both water quantity and water quality issues within the Upper Mojave River Valley groundwater basin. A number of water management plans are being developed through that stakeholder collaboration process, and strategies continue to be developed and refined to sustain water quantity and to manage salts and nutrients to maintain the quality of groundwater and surface water resources.

L10-4

2. The foremost method of reducing impacts to watersheds from development is LID, the goals of which are maintaining a landscape functionally equivalent to predevelopment hydrologic conditions and minimal generation of non-point source pollutants. LID results in less surface runoff and potentially less impacts to receiving waters, the principles of which include:

   - Maintaining natural drainage paths and landscape features to slow and filter runoff and maximize groundwater recharge;
   - Reducing compacted and impervious cover created by development and the associated road network; and
   - Managing runoff as close to the source as possible.

   LID development practices that maintain aquatic values also reduce local infrastructure requirements and maintenance costs and benefit air quality, open space, and habitat. Vegetated areas for storm water management and infiltration onsite are valuable in LID.

L10-5

3. Increased runoff from developed areas is a key variable driving a number of adverse effects, attention to maintaining the pre-development hydrograph will prevent or minimize many problems and will limit the need for other analyses and mitigation. Traditional methods for managing urban storm water do not adequately protect the environment and tend to treat symptoms instead of causes. Such practices have led to channelization and stream armoring that permanently alter stream habitat, hydrology, and aesthetics, resulting in overall degradation of a watershed. L10-5 cont.

   Storm water control measures that are compatible with LID are preferred over more traditional methods. Examples include the use of bioretention swales, pervious pavement, and vegetated infiltration basins, all of which can effectively treat post-construction storm water runoff, help sustain watershed processes, protect receiving waters, and maintain healthy watersheds. Any particular one of these control measures may not be suitable, effective, or even feasible in every instance, but the right combination, in the right places, can successfully achieve these goals. L10-6

4. Hydromodification is the alteration of the natural flow of water through a landscape (e.g. lining channels, flow diversions, culvert installations, armoring, etc.). Disturbing and compacting soils, changing or removing the vegetation cover, increasing impervious surfaces, and altering drainage patterns limit the natural hydrologic cycle processes of absorption, infiltration, and evapotranspiration, and increases the volume and frequency of runoff and sediment transport. Hydromodification results in stream channel instability, degraded water quality, changes in groundwater recharge processes, and aquatic habitat impacts. Hydromodification also can result in disconnecting a stream channel from its floodplain. Floodplain areas provide natural recharge, attenuate flood flows, provide habitat, and filter pollutants from urban runoff. Floodplain areas also store and release sediment, one of the essential processes to maintain the health of the watershed. Information regarding hydromodification can be accessed online at http://www.swrcb.ca.gov/water_issues/programs/stormwater/hydromodification.shtml L10-7

5. **Section 5.9.2.3 – Regional Water Quality Control Board Environmental Screening Levels** – The section incorrectly states that the Lahontan Regional Water Quality Control Board has adopted the Environmental Screening Levels (ESLs) set by the San Francisco Regional Water Quality Control Board. The Lahontan Regional Water Quality Control Board looks to the Office of Environmental Health Hazard Assessment (OEHHA) for assistance when ESLs are needed to be reviewed. L10-8

6. **Section 5.10.2.4 – San Bernardino County Municipal Separate Storm Sewer System Permit** – This section incorrectly describes how the municipalities are regulated under the Municipal Stormwater Program. The Municipal Storm Water Program regulates storm water discharges from municipal separate storm sewer systems (MS4s) throughout California. U.S. EPA defines an MS4 as a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains) owned or operated by a State (40 CFR 122.26(b)(8)). L10-9

   Pursuant to the Federal Water Pollution Control Act (Clean Water Act) section 402(p), storm water permits are required for discharges from an MS4 serving a

population of 100,000 or more. The Municipal Storm Water Program manages the Phase I Permit Program (serving municipalities over 100,000 people), the Phase II Permit Program (for municipalities less than 100,000), and the Statewide Storm Water Permit for the State of California Department of Transportation. The State Water Resources Control Board (State Water Board) and Regional Water Quality Control Boards (collectively, the Water Boards) implement and enforce the Municipal Storm Water Program. L10-9 cont.

The Town of Apple Valley, the cities of Victorville and Hesperia, along with San Bernardino County collaborate as the Mojave River Watershed Group to fulfill the requirements of the MS4 Program. Each entity maintains its own permit coverage while working together towards common goals. The City of Barstow also has its own MS4 permit but has chosen to manage their program individually.

7. **Section 5.17.6 – Barstow International Gateway – Wastewater** – The section states "Rail yard wastewater would be collected and treated with an oil water separator before being discharged to the wastewater system." The Water Board recommends that the BIG facility collaborate with the City of Barstow to determine whether the City of Barstow's wastewater treatment plant (WWTP) has the capability to treat metal pollutants from railroad activities. Considerations should include any pretreatment, ensuring future compliance with state regulations by the WWTP. L10-10

8. **Impact 5.9-1** – The section states "…groundwater extracted from construction or operation well from these areas is not planned to be used as a potable water source." The EIR should evaluate and discuss whether groundwater from this area will be used for non-potable or construction purposes. Given the high nitrate and total dissolved solids (TDS) concentrations from groundwater sourced in the vicinity of the former N&M Diary, groundwater should be analyzed for nitrate and TDS and use dependent on concentration levels. The Water Board should be notified of high nitrate and TDS concentration groundwater use. L10-11

PERMITTING REQUIREMENTS

A number of activities that will be implemented have the potential to impact waters of the State and, therefore, may require permits issued by either the State Water Resources Control Board (State Water Board) or Lahontan Water Board. The required permits may include the following.

1. Streambed alteration and/or discharge of dredge and/or fill material to a surface water, including water diversions, may require a CWA, section 401 water quality certification for impacts to federal waters (waters of the U.S.), or dredge and fill WDRs for impacts to non-federal waters, both issued by the Lahontan Water Board. L10-12

2. Land disturbance of more than 1 acre may require a CWA, section 402(p) storm water permit, including a National Pollutant Discharge Elimination System (NPDES) General Construction Storm Water Permit, Water Quality Order (WQO) 2022-0057-DWQ, obtained from the State Water Board, or an individual storm water permit obtained from the Lahontan Water Board.

https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2022/wqo_2022-0057-dwq.pdf

3. Industrial facilities such as manufacturers, landfills, mining, steam generating electricity, hazardous waste facilities, transportation with vehicle maintenance, larger sewage and wastewater plants, recycling facilities, and oil and gas facilities are typically required to obtain Industrial General Permit coverage (IGP). This Project has been identified as needing to obtain coverage under the IGP which can be done on the SMARTS website at https://smarts.waterboards.ca.gov/smarts/faces/SwSmartsLogin.xhtml.

4. Water diversion and/or dewatering activities may be subject to discharge and monitoring requirements under either NPDES General Permit, Limited Threat Discharges to Surface Waters, Board Order No. R6T-2014-0049, or General Waste Discharge Requirements for Discharges to Land with a Low Threat to Water Quality, WQO-2003-0003, both issued by the Lahontan Water Board. Project proponents should consult with Water Board staff early on should implementation of individual projects result in activities that trigger these permitting actions. Information regarding these permits, including application forms, can be downloaded from our web site at http://www.waterboards.ca.gov/lahontan/.

L10-12 cont.

Thank you for the opportunity to comment on the DEIR. If you have any questions regarding this letter, please contact me at (760) 241-7305 (tiffany.steinert@waterboards.ca.gov) or Christina Guerra, Senior Engineering Geologist, at (760) 241-7333 (christina.guerra@waterboards.ca.gov). Please send all future correspondence regarding this Project to the Water Board's email address at Lahontan@waterboards.ca.gov and be sure to include the Project name in the subject line.

(*for*) Tiffany Steinert
Engineering Geologist

cc: State Clearinghouse (SCH No. 2024020501) (state.clearinghouse@opr.ca.gov)
California Dept. of Fish and Wildlife (AskRegion6@wildlife.ca.gov)

RESPONSE TO COMMENT LETTER L10, LAHONTAN REGIONAL WATER QUALITY CONTROL BOARD (RWQCB)

The City acknowledges the Lahontan RWQCB's role as a Responsible Agency and its ability to exercise its own judgment regarding the Final EIR's adequacy in accordance with State CEQA Guidelines § 15096(e). A discussion related to the Lahontan RWQCB's jurisdiction relevant to the Project is included in **Draft EIR Section 3.0: Project Description** and **Draft EIR Sections 5.1** through **5.17**, as appropriate. The anticipated Lahontan RWQCB approvals are listed in **Draft EIR Section 3.0: Project Description Table 3-16: Proposed General Plan Permits and Approvals** (page 3-92) and **Table 3-17: BIG Permits and Approvals** (page 3-93). Per CEQA, a responsible agency should provide substantive comments, supported by specific documentation, regarding those project activities within an area of expertise of the agency or that are required to be carried out or approved by the agency. (Pub. Resources Code, § 21153(c).) Consistent with this, the City has carefully reviewed the Lahontan RWQCB's comments on the Draft EIR and where necessary, revised the EIR accordingly, except as otherwise explained in the responses to comments below.

L10-1 through L10-7 See **Consolidated Response 04** concerning general non-CEQA issues.

L10-8 Comment noted. The Draft EIR, page 5.9-23, has been revised as shown below and as shown in **Final EIR Section 3.0: Errata to the Draft EIR**.

> **~~Regional Water Quality Control Board~~ Environmental Screening Levels**
>
> The Lahontan Regional Water Quality Control Board, which encompasses the City of Barstow, ~~has adopted~~ looks to certain standards developed by the ~~San Francisco Regional Water Quality Control Board~~ Office of Environmental Health Hazard Assessment (OEHHA), a division of the California Environmental Protection Agency (CalEPA). OEHHA has developed health protective screening values, including the California Human Health Screening Levels (CHHSLs), to support the preliminary evaluation of potential human health risks at sites with environmental contamination. These screening values are based on conservative exposure assumptions and are intended to identify conditions under which further evaluation may be warranted. CHHSLs are advisory in nature and do not constitute regulatory standards or cleanup levels. Additionally, OEHHA CHHSLs have not been comprehensively updated since 2010 and may not reflect the most current toxicity criteria or exposure assumptions used by regulatory agencies.
>
> In addition to OEHHA guidance, multiple regulatory agencies in California and at the federal level have developed environmental screening levels (ESLs) or equivalent benchmarks that are commonly used to evaluate soil, groundwater, soil vapor, and indoor air quality. These include:
>
> - Department of Toxic Substances Control (DTSC)–modified Screening Levels, published in Human Health Risk Assessment (HHRA) Note 3, which are based on U.S. Environmental Protection Agency (EPA) Regional Screening Levels but modified to reflect California specific toxicity criteria and exposure assumptions;
> - U.S. EPA Regional Screening Levels (RSLs) for Region 9, which provide risk based concentrations for evaluating human health impacts at contaminated sites nationwide; and

- Environmental Screening Levels (ESLs) developed by the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB), which incorporate conservative land use assumptions and exposure pathways applicable to a wide range of site conditions.

Although these screening criteria are derived using similar risk assessment principles, they differ in their underlying assumptions regarding exposure duration, receptor characteristics, land use, and applicable toxicity values. As a result, screening levels developed by different agencies for the same constituent and environmental medium may vary, with some providing more health protective (i.e., lower) threshold concentrations than others.

~~Specifically, the San Francisco Regional Water Quality Control Board (SFRWQCB) has developed Environmental Screening Levels (ESLs) to assist in assessing the potential threats to human health and the environment and evaluation of potential environmental concerns at contaminated sites. Concentrations of constituents collected at a site in either soil, groundwater, or vapor samples can be directly compared to ESLs, to aid in determining the need for additional sampling efforts or assess level of potential contamination. ESLs have been developed for more than 100 commonly detected constituents. They address a full range of concerns encountered at contamination sites and are protective of human health, water quality, and the environment. The ESLs do not constitute policy or regulation, and their use is optional.~~

~~While the ESLs developed by the SFRWQCB are primarily designed for and utilized by that agency, other agencies may also adopt these levels. Since 2019, ESLs have been widely used across California. In addition to SFRWQCB ESLs, other screening levels are used in the State, such as the U.S. EPA's Regional Screening Levels and DTSC-modified Screening Levels. The conceptual site model applied to determine the ESLs applies to many sites throughout California.~~ Among the available screening benchmarks, the SFBRWQCB ESLs are generally the most current and most conservative, as they are intended to broadly protect sensitive receptors across multiple exposure pathways under a range of site conditions, and they are routinely updated to reflect advances in science and regulatory practice. The SFBRWQCB ESLs are widely used throughout California, including by other Regional Water Quality Control Boards, as a conservative screening tool. Generally, ESLs can be used at any site with the agreement of all stakeholders. The Lahontan Regional Water Quality Control Board, which encompasses Barstow, has utilized ~~has adopted~~ the SFRWQCB-ESLs ~~(LRWQCB, 2022)~~.

For purposes of this environmental impact analysis, the SFBRWQCB ESLs were used as the primary screening criteria. Use of the most conservative applicable screening levels ensures that the evaluation of potential human health impacts errs on the side of protection and provides a conservative basis for determining whether the project could result in significant impacts under CEQA.

These changes only clarify the discussion in the Draft EIR. The conclusions of the Draft EIR remain valid. Also see **Consolidated Response 03** concerning recirculation of the draft EIR.

L10-9 Comment noted. The Draft EIR, page 5.10-13, has been revised as shown below and as shown in **Final EIR Section 3.0: Errata to the Draft EIR**.

~~San Bernardino County Municipal Separate Storm Sewer System Permit~~ Municipal Storm Water Program

~~In compliance with the requirement to develop a Stormwater Management Program, San Bernardino County has developed a Stormwater Management Program for the Mojave River area, in conjunction with the Town of Apple Valley and the cities of Victorville and Hesperia. The Phase II MS4 covers the watershed's urbanized area, including the City of Barstow. The Stormwater Management Program was developed under NPDES General Permit Number CAS000004 requirements~~ The Municipal Storm Water Program regulates storm water discharges from municipal separate storm sewer systems (MS4s) throughout California. U.S. EPA defines an MS4 as a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains) owned or operated by a State (40 CFR 122.26(b)(8)).

Pursuant to the Federal Water Pollution Control Act (Clean Water Act) section 402(p), storm water permits are required for discharges from an MS4 serving a population of 100,000 or more. The Municipal Storm Water Program manages the Phase I Permit Program (serving municipalities over 100,000 people), the Phase II Permit Program (for municipalities less than 100,000), and the Statewide Storm Water Permit for the State of California Department of Transportation. The State Water Resources Control Board (State Water Board) and Regional Water Quality Control Boards (collectively, the Water Boards) implement and enforce the Municipal Storm Water Program.

The Town of Apple Valley, the cities of Victorville and Hesperia, along with San Bernardino County collaborate as the Mojave River Watershed Group to fulfill the requirements of the MS4 Program. Each entity maintains its own permit coverage while working together towards common goals.

The purpose of the program is to keep the Mojave River clean to the maximum extent practicable utilizing BMPs to reduce stormwater runoff and non-stormwater runoff flowing in the Mojave River. The program also serves to keep contamination, such as sediment, non-sediment solids, nutrients, pathogens, oxygen-demanding substances, petroleum hydrocarbons, heavy metals, floatables, polycyclic aromatic hydrocarbons, pesticides, herbicides, and trash from entering the storm drain system.

The City of Barstow also has its own MS4 permit but has chosen to manage its program individually. ~~The City obtains coverage under the County's Phase II MS4 permit.~~ Barstow is individually responsible for complying with the ~~County's Stormwater Management Program~~ Municipal Storm Water Program requirements including, but not limited to, establishing a stormwater management plan, implementing BMPs, conducting regular

inspections, ensuring compliance with TMDLs and local stormwater ordinances, and filing annual reports and monitoring data to the State Water Board.

These changes only clarify the discussion in the Draft EIR. The conclusions of the Draft EIR remain valid. Also see **Consolidated Response 03** concerning recirculation of the draft EIR.

L10-10 The City of Barstow WWTP currently receives industrial wastewater from the existing BNSF rail facility located in the City. As such, the WWTP has existing infrastructure to remove metals with pre-treatment and primary treatment devices (e.g., grit chambers and clarifiers).

L10-11 Commenter raises some concerns about the Draft EIR's analysis as it pertains to groundwater use. Potable and non-potable water during operations would be provided from Golden State Water Company. Non-potable water during construction would be provided from groundwater wells on-site.

The comment focuses on nitrate and TDS, which both include health risk based on ingestion and not dermal exposure (i.e., skin contact). As groundwater extracted during construction would not be for potable uses for either construction or operations, no significant impact is anticipated (**Draft EIR Section 5.9: Hazards, Hazardous Materials, and Wildfire** page 5.9-125).

Additionally, implementation of **MM BIG HAZ-2** would require adherence to the State RWQCB and regional Certified Unified Program Agency (CUPA) guidelines for well abandonment and construction. Further, new water wells and existing wells to be used during construction would require additional sampling to verify whether the water meets the regulatory thresholds and determine its applicability for use during construction. Based upon the results of the sampling in comparison to regulatory thresholds, water can be reused for BIG construction or need wellhead treatment prior to any reuse associated with BIG.

Should detection of contaminants in exceedance of the MCLs occur, as noted above wellhead treatment prior to any use would be required and notification to RWQCB would occur in compliance with any applicable laws, rules, and ordinances.

L10-12 See **Consolidated Response 04** concerning general non-CEQA issues. It should be noted that all permits identified by the commenter are identified in **Draft EIR Table 3-17: BIG Permits and Approvals** (page 3-44) as permits or approvals required for the implementation of BIG.

COMMENT LETTER L11

BNSF BIG DEIR Comment Letter from MWA

Tony Winkel <TWinkel@MojaveWater.org>

Sat 12/27/2025 8:52 AM

To: GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

Cc: Adnan Anabtawi <AAnabtawi@MojaveWater.org>; Melody Bailey <MBailey@MojaveWater.org>; La Trici Jones <ljones@mojavewater.org>; Andrea Hostetter <ahostetter@mojavewater.org>;

1 attachments (217 KB)

BNSF Comment Letter A. Anabtawi.pdf;

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Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!

Caution! This message was sent from outside your organization.

Dear City of Barstow Community Development Staff,

On behalf of the Mojave Water Agency (MWA), I am writing to coordinate the submittal of a comment letter regarding the BNSF Barstow International Gateway Draft Environmental Impact Report. A hard copy of the letter will be mailed to your office, and an electronic copy is attached to this email as a PDF for your review and consideration. L11-1

If you have any questions or require additional information in advance, please do not hesitate to contact us. Thank you for your time and assistance.

Tony Winkel, P.E., P.G.
Senior Principal Hydrogeologist

Mojave Water Agency
13846 Conference Center Drive
Apple Valley, CA 92307
Main: (760) 946-7000
Direct: (760) 946-7037
Fax: (760) 240-2642
Cell: (760) 403-1560
email: twinkel@mojavewater.org

Book time to meet with me

Mojave Water Agency

December 26, 2025

City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311
(760) 256-8617
generalplan@barstowca.org

Subject: Comments on the Draft Environmental Impact Report for the Barstow International Gateway Specific Plan

Dear City of Barstow:

The Mojave Water Agency (MWA) appreciates the opportunity to review the Draft Environmental Impact Report (EIR) for the BNSF Railway Barstow International Gateway (BIG) Specific Plan. As the regional water management agency and Mojave Basin Area Watermaster (Watermaster), MWA has evaluated the EIR for potential impacts to regional groundwater and surface water resources, recharge facilities, and basin-wide water management operations. L11-2

MWA respectfully submits the following comments and recommendations.

1. Mojave River Pipeline (MRP)

The BIG Specific Plan spans approximately 4,335 acres and includes extensive rail, warehouse, utility infrastructure, and industrial operation. The project overlaps with or lies in proximity to the Mojave River Pipeline (MRP). Relocation of approximately six miles of the MRP is identified in Section 2.41 and illustrated in Figure 2-21.

The MRP conveys State Water Project (SWP) water for groundwater recharge at Hodge, Lenwood, Daggett, and Newberry Springs. These facilities are critical to regional aquifer recharge and local water supply. While the EIR states that the MRP will be relocated to avoid conflicts with the rail yard, it does not substantively evaluate potential impacts associated with this relocation. L11-3

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Mojave Water Agency

MWA Requests:

- Analysis of and confirmation that the proximity of rail, bridge, and other infrastructure to the relocated pipeline will not impact or interfere with the operation or maintenance of the MRP.
- Assurance that construction-related vibration, scour, and floodplain interactions will not adversely affect either the relocated segments or the portions of the MRP to be preserved.
- Analysis of pipeline hydraulics, right-of-way needs, and protection at crossings and floodplain interfaces to ensure continued safe operation and maintenance of the MRP.
- Alignments of any relocated portions of the MRP remain as straight as possible.
- All costs associated with design, review, relocation, and protection of the MRP in connection with the BIG project will be borne by the BIG project proponents and not by MWA.
- Assurance that all design and construction elements—including valves, appurtenances, and access requirements—will be acceptable to MWA. (MWA appreciates the communication and design coordination that has already occurred with the BNSF engineering team and expects this coordination to continue throughout the project.)

L11-3 cont'd

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2. Hodge USGS Stream Gaging Station

Reconstruction of the Hinkley Road Bridge (Table 2-4) will affect the Hodge Stream Gaging Station installed on the exiting bridge. This gage is funded by MWA and operated by the USGS and provides essential water flow data used for regional groundwater management. The EIR does not evaluate impacts to this gaging facility nor identify appropriate protection or reconstruction measures.

L11-4

MWA Requests:

Mojave Water Agency

- Coordination with MWA, the U.S. Geological Survey (USGS), and the BNSF engineering team regarding the design and relocation of the Hodge Stream Gage to the new bridge location.
- All costs associated with design, review, relocation, and protection of the Hodge Gage in connection with the BIG project will be borne by the BIG project proponents and not by MWA.
- Minimization of downtime between demolition of the existing gage and installation of the replacement gage to minimize data loss of critical storm flow measurements within the Mojave River.

L11-4 cont'd

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3. MWA Groundwater Monitoring Wells

The EIR does not identify MWA-designated key groundwater monitoring wells located within or adjacent to the project area. These wells are critical infrastructure supporting long-term basin management that may be affected by grading, construction, or operational activities.

MWA Requests:

- Continued access to all impacted monitoring wells during BIG project construction and after project completion. Access needs to include sufficient space (size and configuration) to allow monitoring, maintenance, sampling, and replacement as necessary.
- All costs associated with design, review, relocation, and protection of the MWA monitoring Wells in connection with the BIG project will be borne by the BIG project proponents and not by MWA.
- Coordination with the BNSF engineering team for all planning and design activities affecting MWA or USGS facilities. (MWA appreciates the communication and design coordination that has already occurred with the BNSF engineering team and expects this coordination to continue throughout the project.)
- Consideration of a data-sharing agreement between MWA and BNSF for any groundwater monitoring program associated with the project.

L11-5

Mojave Water Agency

4. Temporary Groundwater Extraction for Construction

The project proposes temporary non-potable construction wells, as described in Section 2.4.1 of the EIR.

MWA Requests:

- Quantification of total extraction volumes, pumping rates, and pumping duration, with reporting to the Watermaster.
- Preparation of a hydrogeologic assessment evaluating potential short-term groundwater drawdown and water-quality impacts.
- Confirmation that all pumping activities will comply with the Mojave Basin Area Judgment, including well registration, metering, and Watermaster reporting requirements.
- Proper abandonment of temporary wells in accordance with San Bernardino County standards, or, where practicable, conversion of such wells to permanent monitoring wells with permanent access granted to MWA.

L11-6

5. Stormwater Detention Basins and Stormwater Discharge

Numerous stormwater detention basins are proposed within the Mojave River Buffer, as described in Section 3.3.3 of the EIR. Stormflows into the Mojave River provide the single most significant source of groundwater recharge and are the region's only natural water-supply replenishment source. The EIR states that stormwater in excess of predevelopment flows will be detained, infiltrated, and discharged to existing drainageways using stormwater best management practices (BMPs).

MWA Requests:

- Additional detail regarding stormwater quality protection measures related to industrial pollutants such as hydrocarbons, metals, and other contaminants that may infiltrate into the underlying drinking-water aquifer.

L11-7

Mojave Water Agency

- Identification of pollutant source-control measures and runoff BMPs designed to prevent contamination of infiltrating stormwater.
- Consideration of a cooperative agreement between MWA and BNSF for a managed aquifer recharge program using SWP water conveyed through the MRP into infiltration basins constructed as part of the BIG project.

L11-7 cont'd

6. Groundwater Quality Protection

The BNSF BIG facility and associated rail operations—including fueling, maintenance, transloading, and other industrial activities—are located adjacent to the Mojave River. Section 2.4.3 of the EIR addresses drainage, grading, floodplain conditions, and stormwater management. The Mojave River is the single most critical component of both natural and imported water-supply infrastructure for the Barstow region. Surface water from stormflow runoff and imported SWP supplies infiltrate through the riverbed into the underlying aquifer. Consequently, any contaminated surface water entering the river and adjacent floodplain sediments poses a significant risk to groundwater quality.

L11-8

MWA Requests:

- Opportunity to review and comment on the project's stormwater management plan.
- Implementation of containment, spill-prevention measures, and emergency-response procedures consistent with Lahontan Regional Water Quality Control Board requirements.
- Consideration and documentation of how these measures will ensure long-term groundwater protection and compatibility with nearby MWA SWP recharge operations.

7. Long-Term Water Demand and Supply Reliability

Projected water demands for the BIG project were not included in the 2020 Golden State Water Company (GSWC) Urban Water Management Plan (UWMP), the City of Barstow General Plan, or MWA's 2020 Wholesale UWMP. As such, the EIR cannot assume that sufficient regional water supplies are currently available within GSWC's portfolio. The analysis relies on a Draft Water Supply Assessment (WSA) prepared by GSWC, which is subject to change. Additionally, inconsistencies exist between the projected demand

L11-9

Mojave Water Agency

values presented in the Draft WSA and those referenced in the Draft EIR, limiting MWA's ability to fully evaluate potential impacts.

MWA Requests:

- Clarification of total anticipated project water demand and confirmation of the final, adopted WSA.
- Coordination with MWA and the Watermaster to incorporate project demands into basin-wide water planning efforts including the 2025 UWMP plan to be adopted and submitted by June 2026.
- Verification that long-term project water demands fall within adjudicated pumping rights and will remain compliant with the Mojave Basin Area Adjudication.

L11-9 cont'd

8. Grading, Soil Compaction, and Recharge Impacts

The project proposes approximately 26 million cubic yards of cut and fill, excavation depths of up to 40 feet, and extensive stormwater redirection.

MWA Requests:

- Evaluation of how grading, soil compaction, and drainage modifications will affect infiltration capacity and natural recharge patterns, particularly near ephemeral channels and the Mojave River.

L11-10

9. Mitigation Monitoring and MWA Coordination

Although the EIR references compliance with MWA requirements, MWA is not identified as a reviewing agency in the Mitigation Monitoring and Reporting Program (MMRP).

MWA Requests:

- Inclusion of MWA as a reviewing entity for all water-resource-related mitigation measures, especially those addressing hydrology, drainage, groundwater, and water supply.

L11-11

Mojave Water Agency

Summary of Requested Actions

MWA respectfully requests that the Final EIR include:

- Full coordination with MWA regarding design, protection, access, and timing related to the Mojave River Pipeline, MWA monitoring wells, and the Hodge USGS Stream Gage. All such costs associated with design, review, relocation, and protection of MWA facilities in connection with the BIG project will be borne by the BIG project proponents and not by MWA.
- Assessment of hydrologic impacts associated with grading, stormwater detention, surface-to-groundwater infiltration, and discharges to the Mojave River.
- Demonstration of long-term water-supply reliability consistent with adjudicated pumping rights, in coordination with MWA.
- Comprehensive groundwater quality protection measures and monitoring.
- Inclusion of MWA as a review entity for all water-related mitigation measures.

L11-12

MWA appreciates the opportunity to provide comments and looks forward to continued coordination with the City of Barstow and BNSF Railway on this significant regional project. Please contact us with any questions or to schedule technical coordination meetings.

Sincerely,

Adnan Anabtawi
General Manager
Mojave Water Agency
13846 Conference Center Drive
Apple Valley, CA 92307
(760) 946-7000
aanabtawi@mojavewater.org

RESPONSE TO COMMENT LETTER L11, MOJAVE WATER AGENCY (MWA)

L11-1 Commenter raises some concerns about the Draft EIR's analysis that are best addressed by sharing technical and scientific information, which is provided below. This is an informational comment outlining the submittal of the comment letter. See **Consolidated Response 04** concerning general non-CEQA issues.

L11-2 This comment establishes Mojave Water Agency (MWA) as the regional water management agency and Mojave Basin Area Watermaster (Watermaster). This has also been identified in **Draft EIR Appendix 5.10 BIG-1: Hydrology and Hydraulic Design Technical Support**. **Draft EIR Section 5.17: Utilities and Service Systems**, which recognizes MWA adopted Ordinance No. 14 concerning new Minimal Producers (small water users with new wells) within the Mojave Basin Area. This comment is an introduction to the comments below. See **Consolidated Response 04** concerning general non-CEQA issues.

L11-3 The proposed relocation of the MRP is illustrated in **Draft EIR Figure 3-20: BIG Proposed Water Improvements** (page 3-60) and is referred to as "Proposed 48 MWA Relocation" in the **Draft EIR** and as "MWA Re-alignment" in **Draft EIR Appendix 5.10 BIG-1 Hydrology and Hydraulic Design Technical Report**. The impacts of the relocation to groundwater supply and recharge have been considered. As noted in **Draft EIR Appendix 5.10 BIG-1** (page 35), concerning BIG's potential to decrease groundwater supplies or interfere with groundwater recharge, the analysis was conducted through review of available groundwater data from the local water district and the USGS as well as professional judgement from qualified individuals in accordance with project design features and BMP implementation. Temporary (construction) and permanent (operational) BMP design was considered with regard to this analysis. The relocated MRP would be designed in accordance with all applicable laws, rules, regulations, and ordinances, including those outlined within the California Building Code. Relocation of the MRP would not interfere with groundwater recharge and disruptions to groundwater recharge would be minimized as it pertains to **Draft EIR Impact 5.10-2** (page 5.10-57). Alignments of the relocated portions of the MRP, the "Proposed 48-inch MWA Relocation," are depicted in **Draft EIR Figure 3-20: BIG Proposed Water Improvements** (page 3-60) and would be designed with all applicable laws, rules, regulations, and ordinances, including the design and construction of adequate reinforcements at fittings and intersections where applicable according to MWA standards. All design and construction elements, such as valves, appurtenances, and access requirements, would also be in accordance with all applicable laws, rules, regulations, and ordinances. Costs associated with design, review, relocation, and protection of the MRP would continue to be coordinated between BNSF and MWA.

As discussed in **Draft EIR Appendix 5.10 BIG-1** (page 12), BIG proposes to relocate this existing line to the north to avoid conflict with rail yard and transload warehouse center improvements. Reconstruction of the Hinkley Road Bridge over the Mojave River would also be designed in accordance with all applicable laws, rules, regulations, and ordinances, including those outlined within the California Building Code. Furthermore, as discussed in **Draft EIR Appendix 5.10 BIG-1** (page 59), while BIG operations would consist of increased

impervious surfaces, such as roadways, concrete, and buildings, the onsite stormwater basins would collect all stormwater runoff and runoff from operations (e.g., washdown, maintenance, etc.) within the BIG footprint and allow any rain water/runoff to percolate and infiltrate into the ground.

Ground-borne vibration levels associated with construction-related activities for BIG were evaluated utilizing typical ground-borne vibration levels associated with construction equipment, obtained from FTA published data for construction equipment. Potential ground-borne vibration impacts related to building/structure damage and interference with sensitive existing operations were evaluated, considering the distance from construction activities to nearby land uses and the typically applied criteria. Although portions of the existing Mojave River pipeline to be preserved are within the BIG Specific Plan, as illustrated in **Draft EIR Figure 3-20: BIG Proposed Water Improvements** (page 3-60), construction-related vibration associated with the transload warehouse, particularly pile driving, would occur at distances greater than 97 feet from the pipeline. This distance exceeds the minimum separation required to remain below the 0.2 in/sec peak particle velocity (PPV) threshold for building damage, thereby avoiding adverse effects on the pipeline. As discussed in **Draft EIR Section 5.12: Noise and Vibration** (page 5.12-37), the *Caltrans 2020 Transportation and Construction Vibration Guidance Manual* identifies 0.2 in/sec PPV as the applicable vibration damage threshold. Therefore, construction activities would not result in adverse vibration-related effects on the existing pipeline. Accordingly, as identified in **Draft EIR Section 5.15: Noise and Vibration** (page 5.12-134), impacts resulting from excessive ground borne vibration would be less than significant.

In summary, for the reasons above, the relocation of the pipeline would not interfere or impact the operation or maintenance of the MRP and impacts would be less than significant. Further coordination between BNSF and MWA would occur to take a reasonable precaution that the five issues raised would be considered appropriately and that BIG implementation would not impact the MRP in a damaging way and that all improvements would be done according to all applicable laws, rules, and ordinances.

L11-4 As discussed in **Draft EIR Section 3.0: Project Description** (page 3-68), the Hinkley Road Bridge would be reconstructed to conform to current federal and State standards and to solve the existing flooding and overtopping problems. As discussed in **Draft EIR Section 3.0**: **Project Description** (page 3-87), existing utilities and service systems (underground and aboveground) within the BIG footprint would be removed or temporarily relocated as needed. BNSF would coordinate with the applicable entity to ensure appropriate temporary removal and reinstallation of the Hodge Stream Gage in accordance with applicable federal, State, regional, and local laws, regulations, and orders. Accordingly, no significant environmental issues are raised and no changes to the Draft EIR are needed. The comment pertaining to the request for downtime to be reduced to minimize data loss of critical storm flow measurements with Mojave River is noted.

L11-5 Water for the Barstow area is sourced almost entirely from pumped groundwater in the Centro Subbasin, which is managed by the MWA. As discussed in **Draft EIR Section 5.10:**

Hydrology and Water Quality (page 5.10-9), the MWA actively monitors groundwater levels and has secured rights to water from the State Water Project to help ensure long-term reliability. Oversight of water quality is provided by the Lahontan Regional Water Quality Control Board (RWQCB), while the County of San Bernardino inspects wells to maintain their integrity and functionality. BIG would not impact any groundwater wells. As discussed in **Draft EIR Section 5.9: Hazards, Hazardous Materials, and Wildfire** (page 5.9-108), with respect to the potential for groundwater contamination, groundwater is not expected to be encountered during construction because the proposed grading cuts are not anticipated to reach the existing groundwater table levels. Furthermore**, MM BIG HAZ-2** (page 5.9-126) requires adherence to State RWQCB and regional CUPA guidelines for well abandonment or additional sampling and well head treatment prior to any reuse associated with BIG. As identified in **Draft EIR Section 5.9: Hazards**, **Hazardous Materials, and Wildfire** (page 5.9--120), with incorporation of mitigation, BIG construction and operations would not create a significant hazard to the public or the environment.

As discussed in **Draft EIR Section 5.10: Hydrology and Water Quality**, the City coordinated with MWA to more accurately estimate existing water demands and projected water demands associated with the proposed General Plan and better align with the upcoming 2025 UWMP (at the regional and local level). Comment noted pertaining to MWA request for continued coordination with the City and the BNSF Engineering team regarding MWA or USGS facilities. See **Consolidated Response 04** concerning general non-CEQA issues.

Comment noted pertaining to data-sharing agreement request between MWA and BNSF for groundwater monitoring program associated with BIG.

For the reasons above, no significant environmental issues are raised and no changes to the Draft EIR are needed.

L11-6 **Draft EIR Section 5.17: Utilities and Service Systems** (pages 5.17-76 through 5.15-78) identifies that the non-potable water demand for construction activities is estimated to total approximately 6,453 AF, which would exceed the established FPA, that is, the amount BNSF can pump without incurring a "Replacement Obligation." As described below, BIG would be consistent with Judgment and Watermaster Rules and Regulations concerning the options to address this need to pump construction water. Applicable reporting pertaining to groundwater extraction would be conducted in compliance with local regulation ordinances. The Judgment and Watermaster Rules and Regulations provide several options to address the need to pump construction water.

- BNSF can increase its FPA in advance of when it would be required by obtaining temporary transfers (or options for temporary transfers).
- BNSF can pump all the well water needed for construction activities, even significantly in excess of its FPA, in which case BNSF would then have a Replacement Obligation, which can be satisfied by either:
    - Obtaining a temporary transfer at that time (i.e., after confirming how much construction water BNSF pumped in the prior water year) or

- Paying the Replacement Water Assessment.

These options are consistent with the physical solution that the Judgment implemented and that the Watermaster oversees.

It is noted that the Mojave Basin has been sustainably managed under the Judgment, and there is significant unused FPA in the Centro Basin. In its most recent (29th) Annual Report, dated May 2023, the Watermaster reported that the Centro Subarea had 29,839 AF of unused FPA for the 2021-22 water year. Similarly, in the next most recent (28th) Annual Report, dated May 2022, the Watermaster reported that the Centro Subarea had 32,749 AF of unused FPA for the 2020-21 water year. Therefore, the amount of unused FPA available year after year in the Centro Subarea significantly exceeds the amount of water anticipated to be used by BIG for construction activities. Accordingly, sufficient water supplies would be available to serve BIG construction activities during normal, dry, and multiple dry years, following compliance with Judgment and Watermaster Rules and Regulations. As identified in **Draft EIR Section 5.17: Utilities and Service Systems** (page 5.17-80), a less than significant impact would occur in this regard, and no mitigation is required. No revisions to the Draft EIR are needed.

As discussed above and in **Draft EIR Section 5.17** (page 5.17-78), BIG would comply with Judgement and Watermaster Rules and Regulations, including the options identified above, and, therefore, would be consistent with the Mojave Basin Area Judgement. This also includes well registration, metering, and Watermaster reporting requirements. Accordingly, no revisions to the Draft EIR are needed.

As discussed in **Draft EIR Section 5.17** (page 5.17-66), well abandonment and construction would occur pursuant to County Code § 33.06554: Desert Groundwater Management Permits, which requires a permit for any entity that seeks to construct, reconstruct, abandon, or destroy groundwater wells in the County, County Code § 33.0643: Well Abandonment, which provides requirements for when a well must be abandoned.

L11-7 Proposed stormwater basins are described in **Draft EIR Section 3.0: Project Description** (page 3-66) and depicted on **Draft EIR Figure 3-24: BIG Proposed Stormwater Improvements** (page 3-67). As discussed in **Draft EIR Appendix 5.10 BIG-1 Hydrology and Hydraulic Design Technical Report** (page 56), BIG may also implement additional Low Impact Development (LID) measures. LID is a sustainable stormwater management approach that supports water supply objectives and contributes to the protection of water quality. Unlike traditional stormwater management, which collects and conveys stormwater runoff through storm drains, pipes, or other conveyances to a centralized stormwater facility, LID takes a different approach by using site design and stormwater management to maintain the site's pre-development runoff rates and volumes. The goal of LID is to mimic a site's predevelopment hydrology by using design techniques that infiltrate, filter, store, evaporate, and detain runoff close to the source of rainfall. LID has been a proven approach in other parts of the country and is seen in California as an alternative to conventional stormwater management. The exact types of LIDs to be implemented by BIG are not currently known; this would be determined

as part of BIG design, specifically through the design and development of the WQMP at a later date. Further development of BIG design would be required.

As discussed in **Draft EIR Section 5.10: Hydrology and Water Quality** (page 5.10-7), details pertaining to stormwater quality protection measures would be addressed in a SWPPP that must identify BMPs implemented on the construction site to protect stormwater runoff and must contain a visual monitoring program; a chemical monitoring program for "non-visible" pollutants to be implemented if there is a failure of BMPs; and a monitoring plan if the site discharges directly to a water body listed on the State's 303(d) list of impaired waters. Furthermore, as discussed in **Draft EIR Appendix 5.10 BIG-1** (pages 56 and 57), BIG would be required to obtain and maintain an Industrial General Permit (IGP) from the SWRCB. Specifically, the areas of operations that include vehicle maintenance and vehicle cleaning operations would be covered under the IGP. The IGP would identify BMPs and other measures that would need to be implemented, and which types of pollutants would need to be controlled to prevent polluted stormwater runoff. Specific operations that would be controlled include vehicle rehabilitation, mechanical repairs, painting, fueling, and lubrication. Other uses could be covered under the permit and would be determined at the time of the issuance of the permit. Adherence to the conditions of the permit would ensure that operational activities would not be a violation of water quality standards or otherwise cause a degradation of surface waters via the discharge of polluted stormwater from BIG. The IGP would require BIG to sample and test stormwater flows from industrial activity areas to determine compliance with the maximum contaminant levels of specific pollutants that may be produced during BIG operations. Further, the IGP requires that stormwater flows from industrial activity areas must be treated prior to infiltration into the soil or discharge into watercourses. BIG proposes to construct an earthen stormwater conveyance ditch to convey stormwater from the large industrial activity areas (rail yard, vehicle maintenance facility, etc.) to the treatment basins. Water would be allowed to infiltrate through the bottom of this earthen ditch prior to treatment of the stormwater. Under existing operations of the rail corridor there has been no documented contamination of ground or surface waters without the use of BMPs. It is reasonable to assume that the concentration of rail activities to a generalized location and the implementation of project-specific and designed BMPs, as required by the IGP and WQMP, would ensure that the maximum contaminant levels would not be exceeded, and as identified in **Draft EIR Section 5.17: Utilities and Service Systems** less than significant impacts would occur.

Comment is noted, requesting a cooperative agreement between MWA and BNSF for a managed aquifer recharge program using State Water Project (SWP) water conveyed through the MRP into infiltration basins constructed as part of BIG. This comment would be provided to decision makers for consideration. See **Consolidated Response 04** concerning general non-CEQA issues.

L11-8 As discussed in **Draft EIR Section 5.10: Hydrology and Water Quality** (pages 5.10-36 and 5.10-50), the BIG footprint is within the jurisdiction of the LRWQCB and its Basin Plan. In accordance with NPDES requirements, BIG is required to obtain coverage under the Construction General Permit (CGP) as it would disturb more than one acre of soil. To obtain

coverage under the CGP, the BIG Applicant (Master Developer and/or Site Developer, as applicable) would be required to file with the State Water Board the Permit Registration Documents, which include a Notice of Intent (NOI) and other compliance-related documents. The CGP requires development (by a Qualified SWPPP Developer [QSD]) and implementation of a SWPPP and monitoring plan. These must include erosion-control and sediment-control BMPs that would meet or exceed measures required by the CGP to control potential construction-related pollutants. Erosion-control BMPs are designed to prevent erosion, whereas sediment control BMPs are designed to trap sediment once it has been mobilized. During normal construction operations, the SWPPP and monitoring plan are enforced and inspected by a QSP to ensure that adequate protections are in place and maintained throughout construction.

BIG would be consistent with the Water Quality Control Plan for the Lahontan Region (Basin Plan)**.** As discussed in **Draft EIR Section 5.10: Hydrology and Water Quality** (pages 5.10-50 through 5.10-56), BIG would be subject to applicable NPDES water quality requirements of the CGP and the RWQCB Basin Plan. Conformance with these requirements would involve the use of appropriate BMPs during and after construction to address potential impacts associated with the described contaminants as outlined above. Therefore, implementation of containment, spill-prevention measures, and emergency-response procedures would be consistent with the Lahontan RWQCB requirements.

As discussed in **Draft EIR Section 5.10** and **Draft EIR Appendix 5.10-1 BIG-1: Hydrology and Hydraulic Design Technical Report** (page 59), with installation of on-site detention basins, all stormwater and surface flows (including operational runoff [e.g., washdown, maintenance, etc.]) up to the 100-year storm events would be captured on site and allowed to infiltrate into the ground, allowing it to recharge groundwater flows, or would be inflow into the Mojave River. While BIG operations would consist of a large amount of impervious surfaces, such as roadways, concrete, buildings, etc., these onsite stormwater basins would collect all stormwater runoff and runoff from operations (e.g., washdown, maintenance, etc.) within the BIG footprint and allow any rainwater/runoff to percolate and infiltrate into the ground. Once the water has percolated into the ground, it generally flows underground toward the Mojave River. Additionally, the solar farm portion of BIG would generally remain as pervious soils and would allow for percolation during sheet flow and shallow concentrated flow toward the on-site detention basins that would then allow runoff to percolate into the groundwater reservoirs. Thus, BIG would incorporate permanent stormwater management features, such as detention basins and separators, to treat and manage runoff and maintain water quality standards. These design measures have been prepared per local, State and federal requirements and BNSF standards. Comments have been noted pertaining to MWA State Water Project recharge operations.

L11-9 As discussed in **Draft EIR Section 5.10** (page 5.10-58), **Draft EIR Section 5.17, Draft EIR Appendix 5.17 BIG-1 Utility Assessment Technical Report**, and **Draft EIR Appendix 5.17 BIG-2: Water Supply Assessment**, BIG's operational water demand would not interfere with the 2020 GSWC Urban Water Management Plan (UWMP), proposed General Plan, and MWA's 2020 Wholesale UWMP. BIG's operation water demand is estimated to total approximately

404 acre-feet per year (AFY) while the GSWC Barstow service area's water supplies for 2025 are 15,128 AFY; these estimates are consistent across Draft EIR Section 5.17: Utilities and Service Systems (page 5.17-77), Draft EIR Appendix 5.17 BIG-1 (pages 55 and 69), and Draft EIR Appendix 5.17 BIG-2 (page 40). Therefore, BIG operations would not result in insufficient regional water supplies. MWA is correct that BIG was not included in the 2020 Golden State Water Company Urban Water Management Plan (UWMP), which was prepared in 2020 and well in advance of the Notice of Preparation associated with this Draft EIR. However, based upon follow up coordination with the Mojave Water Agency (MWA) on March 5, March 18, and March 19 (2026), MWA confirmed that the City coordinated with MWA in 2025 to develop the water demand and supply figures referenced in the Draft EIR and that the methodology was consistent with the 2020 UWMP. Additionally, MWA confirmed that projected water demands for BIG would be included in the MWA Master Plan and upcoming 2025 UWMP. MWA further stated that BNSF, Golden State Water Company, and the City of Barstow are stipulating Parties to the Mojave Basin Area Judgment. As stipulating Parties, they have a Base Annual Production (BAP) which correlates to an annual Free Production Allowance (FPA). Any pumping over their FPA incurs a Replacement Water Obligation which can be satisfied either by transferring unused FPA from another Party in the Centro Subarea or by paying Watermaster for supplemental (imported) water (from the State Water Project). The request for the City of Barstow to coordinate with MWA and the Watermaster to incorporate project demands into basin-wide water planning efforts, such as MWA's 2025 UWMP, to be adopted and submitted by June 2026, has been noted. This comment would be provided to decision makers for consideration. No changes to the Draft EIR are needed.

L11-10 In **Draft EIR Appendix 5.10 BIG-1 Hydrology and Hydraulic Design Technical Report**, potential alterations to drainage patterns and associated hydrologic and hydraulic effects have been analyzed. The analysis evaluates how changes to existing drainage conditions could result in erosion or siltation, on- or off-site flooding, exceedances of stormwater drainage system capacities, and the impedance/redirection of flood flows. A hydraulic analysis was conducted through the thorough review of published information for BIG, in-house engineering analysis, and professional judgment in accordance with the current standard of care for hydraulic engineering and the hydrology design manual for San Bernardino County, California. The analysis of impacts considers both temporary (construction) and permanent (operational) effects for each impact criterion. The impact conclusions consider the potential for changes in the environmental conditions and compliance with the federal, State, regional, and local regulatory framework. The hydraulics analysis presents the impact on major water features by BIG and is organized to discuss the proposed hydraulic parameters and floodplain setting for BIG extents, Lenwood Channel, MP 10.9 – Unnamed Tributary to the Mojave River, and the Mojave River at Hinkley Road (pages 71 through 76).

Further, **Draft EIR Section 5.10: Hydrology and Water Quality Impact 5.10-2** (page 5.10-56), analyzes BIG's potential to affect infiltration capacity, determining that impacts would be less than significant. **Draft EIR Section 5.10 Impacts 5.10-3** through **5.10-6**, analyze BIG's potential to substantially alter existing drainage patterns of the site, which was determined to be less

than significant. Accordingly, no additional analysis is necessary, and no changes to the Draft EIR are needed.

L11-11 As requested, MWA would be added to the Mitigation Monitoring and Reporting Program (MMRP) as a reviewing agency for water-resource-related mitigation measures for which they have jurisdiction. Temporary water wells would be used for construction, as outlined above in **Response L11-6**, and MWA would be added as a reviewing agency for water well abandonment as identified in **MM BIG HAZ-2**.

L11-12 This comment provides a summary of the preceding comments. See **Responses L11-1** through **L11-11**. See also **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER L12

San Bernardino County Superintendent of Schools
Transforming lives through education

Ted Alejandre
County Superintendent

January 5, 2026

City of Barstow
Attn: Mayor and City Council / Planning Commission
220 E. Mountain View Street, Suite A
Barstow, CA 92311

Re: Letter of Support – The Barstow International Gateway (BIG) Specific Plan

Dear Barstow City Leadership,

On behalf of San Bernardino County Superintendent of Schools, I write to express my support for the **Barstow International Gateway (BIG) Specific Plan** and the opportunities it can create for students, families, and the broader regional economy.

San Bernardino County's public schools serve students who deserve clear, local pathways from education to meaningful careers. The BIG Specific Plan, a project consisting of a rail yard (including a block swap yard and intermodal facility), a transload warehouse center, and a private utility solar farm, along with significant off-site rail and non-rail improvements, represents a generational opportunity to align education, workforce development, and regional infrastructure investments in ways that positively impact our students.

Expanding employment pathways for students and families

The scale and multi-decade timeline of BIG's development and operations builds a tangible bridge from classroom learning to real-world careers. The project's anticipated job creation across construction and long-term operations can translate into paid work-based learning, internships, pre-apprenticeships, and apprenticeship-aligned experiences that build students' skills and earning potential while strengthening local talent pipelines. In particular, the project's components create demand for careers in:

L12-1

Logistics and supply chain operations

- Rail-related operations, maintenance, and safety support roles
- Advanced warehousing, inventory, and technology-enabled distribution
- Construction trades and skilled building careers tied to major infrastructure delivery
- Clean energy and electrical pathways associated with an on-site solar farm and utility infrastructure

Office of the Superintendent
601 North E Street • San Bernardino, CA 92415-0020 • P: 909.386.2406 • F: 909.888.5480 • www.sbcss.k12.ca.us

- Environmental compliance, monitoring, and sustainability-related roles

BIG plays a unique role in San Bernardino County by being able to provide vast local career opportunities in the High Desert region that will support economic stability for families and strengthen the community's retention of talent. BIG will help our students envision a vibrant and meaningful future in the High Desert region.

Strengthening Career Technical Education (CTE) across county schools

The BIG Specific Plan is well-suited to support meaningful enhancements to Career Technical Education (CTE) programs in San Bernardino County by connecting instruction to high-demand industry needs. The intermodal facility's planned use of zero-emission electric hostlers, the project's emphasis on modern goods movement by rail, and the inclusion of a solar utility component together create a powerful platform for 21st-century, technology-forward CTE programs.

This project can serve as a catalyst for expanding or enriching pathways such as:

- Transportation and logistics
- Engineering and architecture (including infrastructure planning support careers)
- Energy, environment, and utilities
- Manufacturing and product development (including equipment systems and maintenance)
- Information and communication technologies as applied to logistics systems

L12-1

With intentional coordination, BIG can become a versatile first step for career exposure—supporting guest instruction, facility tours, classroom-aligned projects, mentorships, and industry-recognized credentialing opportunities that give students a competitive advantage.

Advancing educational partnerships between the City of Barstow and local public schools

SBCSS also recognizes the potential for **strong educational partnerships** between the City of Barstow, participating employers, labor organizations, community colleges, and area public schools. These partnerships could include:

- Formalized work-based learning agreements and student internship pipelines
- Support for dual enrollment and articulated pathways linked to logistics, clean energy, and skilled trades
- Employer-informed curriculum alignment and industry advisory participation
- Career fairs, mentorship programs, and on-the-job learning opportunities for students and recent graduates
- Collaborative efforts to ensure equitable access so students across backgrounds can participate

By treating workforce development as a shared civic priority, the city and local educational institutions can ensure that this project's economic benefits and success translate into direct, measurable opportunities for our students.

Broader community benefits that matter to students

Beyond workforce impacts, BIG's substantial public improvements, such as flood risk reduction through Lenwood Channel widening and bridge replacements, as well as water infrastructure expansion, represent community investments that can improve safety and resilience for families. Additionally, the project's stated intent to shift freight movement from trucks to rail and reduce truck miles aligns with regional goals to improve air quality and reduce greenhouse gas emissions, outcomes that directly affect children's health and learning environments.

Commitment to continued collaboration

As the County Superintendent of Schools, I am committed to working with the City of Barstow and partners to ensure that this project includes intentional, structured education-to-career connections. We encourage continued coordination that prioritizes: (1) high-quality student opportunities, (2) strong safety practices, (3) responsible environmental stewardship, and (4) transparent community engagement as the Specific Plan advances. L12-1

Thank you for your leadership and consideration. We appreciate the City's efforts to plan industrial uses in appropriate locations and to pursue investments that can strengthen the region's economic future. We look forward to partnering in ways that ensure BIG's development supports student success, community prosperity, and long-term opportunity in San Bernardino County.

Sincerely,



Ted Alejandre
San Bernardino County Superintendent of Schools

RESPONSE TO COMMENT LETTER L12, SAN BERNARDINO COUNTY SUPERINTENDENT OF SCHOOLS

L12-1 Thank you for your comment. See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER L13

Town of Apple Valley California

December 18, 2025

Mayor Silva and Members of the Barstow City Council
City of Barstow
220 East Mountain View St., Suite A
Barstow, CA 92311

RE: Letter of Support for the BNSF Barstow International Gateway (BIG) Project

Dear Mayor Silva and Members of the Barstow City Council,

On behalf of the Town of Apple Valley, I am writing to express strong support for the BNSF Barstow International Gateway (BIG) Project. This project offers a tremendous economic opportunity for Barstow and the entire High Desert Region that will increase jobs, promote supply chain resiliency, and decrease trucking transport on our local highways resulting in reduced gas emissions.

BIG would enhance supply chain resiliency, efficiency, and cost-effective goods movement by rail as identified in the 2024 adopted California State Rail Plan to build toward an integrated statewide rail and transit network with investments in zero emission infrastructure. BIG would shift cargo from heavy duty trucking to rail transport at a location away from dense population centers and was planned with the City of Barstow as part of the proposed General Plan to site industrial uses on the western edge of the city away from residential uses. L13-1

Over the next 20 years, BIG is anticipated to create approximately 62,000 direct, indirect and induced construction jobs, including union construction jobs and approximately 15,000 direct, indirect, and induced operation jobs. The construction economic benefit is estimated to be approximately $11 billion and operational economic benefit approximately $7 billion.

BIG would shift a significant portion of freight from trucks to trains, eliminating hundreds of millions of truck miles. This large-scale reduction in truck traffic would lead to a substantial decrease in greenhouse gas emissions. The Town of Apple Valley strongly supports this project.

Sincerely,

Scott Nassif, Mayor
Town of Apple Valley

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RESPONSE TO COMMENT LETTER L13, TOWN OF APPLE VALLEY

L13-1 Thank you for your comment. See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER L14

L14



LAFCO

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SAMUEL MARTINEZ

LEGAL COUNSEL

PAULA DE SOUSA

Sent Via Email (generalplan@barstowca.org) and U.S. Mail

January 7, 2026

Mr. Chris Heldreth, Community Development Director
City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

Re: Comments on the Draft Environmental Impact Report for the City of Barstow Proposed General Plan Update and Barstow International Gateway Project (State Clearinghouse No. 2024020501)

Dear Mr. Heldreth:

The Local Agency Formation Commission for San Bernardino County ("SBLAFCO") appreciates the opportunity to review and provide comments on the Draft Environmental Impact Report ("Draft EIR") for the City of Barstow Proposed General Plan Update and Barstow International Gateway Project ("Project"). Our comments are intended to assist the Lead Agency in refining the EIR so that it provides sufficient information and a clear analysis to support informed decision-making by all agencies involved. We recognize the substantial effort that has gone into preparing the EIR and hope these comments are helpful as you move towards finalizing the document. L14-1

Section	Page	Comment
Executive Summary		
1.3 Project Summary	1-1	First paragraph: Because two of the components of the project are called "BIG," it is unclear which project component is being referenced. Sometimes in the EIR, the term BIG refers to the rail facility but other times it refers to the specific plan. These descriptions should be consistent throughout the EIR. Suggest clarifying the project components and using the description consistently throughout the EIR.
1.3 Project Summary	1-1	First paragraph: Is the "planning for the City's overall long-term development" a distinct project component or a generalized goal?

L14-2

L14-3

Draft EIR
City of Barstow Proposed GPU and BIG Project
Page 2 of 6

Section	Page	Comment
1.3 Project Summary	1-1	Second paragraph: The discussion describes the terms annexations, detachments or reorganizations. To better describe the actions, suggest revising sentence to say "…(SBLAFCO) Actions that involve reorganizations to include annexations and detachments."
1.3 Project Summary	1-1	Second paragraph, second sentence: 1) The discussion defines "annexation" but does not define "detachment." Suggest defining detachment as well. 2) Suggest changing "extended" to "expanded." 3) Suggest also changing "police" to "water" in the example of utility or public service.
1.3 Project Summary	1-1 & 1-2	Second paragraph, third sentence: The description of "reorganization" in the parenthetical should be clarified. It states that the reorganization could include expanding the City and removing area from County Fire for fire service. However, fire service within the City is provided by its subsidiary district, the Barstow Fire Protection District. Therefore, it would be more accurate to state that the reorganization could include removing property from San Bernardino County Fire Protection District and bringing the property into the Barstow Fire Protection District for fire service.
1.3 Project Summary	1-2	First paragraph: This is the first time the two SBLAFCO Actions A and B are mentioned but without sufficient descriptions of what they are. Why are there two SBLAFCO actions (A and B) and what are they? The actual descriptions of the SBLAFCO actions are found much later in the document, namely in Sections 3.1 and 3.7.3. Suggest summarizing these actions and including that here. The descriptions should be consistent throughout the EIR.
1.3 Project Summary	1-2	First paragraph: Suggest deleting "consider" in the phrase "SBLAFCO will independently consider…" and replace with "evaluate and determine."
1.3 Project Summary	1-2	Fifth and sixth paragraphs: Which BIG project does this refer to? The BIG rail facility or the BIG specific plan? It sounds like they are the same thing. If so, why break it apart into two project components in the first paragraph? These descriptions should be consistent throughout the EIR.
1.3.1.1 Proposed General Plan – Land Use and Buildout	1-3	Second paragraph: The discussions of SBLAFCO actions are again mentioned here without sufficient description. Why are there two SBLAFCO actions and what are they? As noted earlier, the actual descriptions of the SBLAFCO actions are found much later in the document. Suggest summarizing these actions or describe them in more detail here.

L14-4

1.3.1.1 Proposed General Plan – Land Use and Buildout	1-3	Second paragraph: The parenthetical should be changed from "…(LAFCO Actions A and B) (annexations, detachments, and reorganizations)" to "…(LAFCO Actions A and B) (reorganizations to include annexations and detachments.)"	L14-4 cont.
1.3.2 Barstow International Gateway (BIG)	1-4	First paragraph: Here is an example where "BIG Specific Plan" refers to both the rail facility and the specific plan. But in section 1.3, it describes them separately. The project description should be consistent throughout the EIR.	
1.3.2 Barstow International Gateway (BIG)	1-5	First Paragraph: Are the economic benefits described on this section cumulative totals or annual? Please clarify.	L14-5
1.4.2.3 BIG West Transload Warehouse Center Alt.	1-10	First Paragraph: Suggest referencing where the Market Analysis can be accessed to allow the conclusion stated on this page to be independently verified.	L14-6
Project Description			
3.1 Introduction	3-1	First paragraph: Here is an example where "BIG projects" refers to both the rail facility and the specific plan. But in section 1.3, it describes them separately. The project description should be consistent throughout the EIR.	
3.1 Introduction	3-2	The description of SBLAFCO Action A and B are unclear in this section. A reader must go to Section 3.7.3 to understand the two different SBLAFCO actions. Suggest providing a better but concise description of the SBLAFCO actions A and B here. These descriptions should be consistent throughout the EIR.	L14-7
3.2 Project Overview	3-2	Fourth paragraph: The descriptions of the SBLAFCO actions as reorganizations are unclear. Suggest providing a better but concise description of the SBLAFCO actions A and B here. These descriptions should be consistent throughout the EIR.	
3.2.2 BIG Overview	3-15	First Paragraph: Although the written description helps, suggest referencing a graphic showing the Lynwood Channel as this is one of the largest areas of disturbance associated with the proposed project. A graphic showing the area of impact would assist the reader to envision this project component.	L14-8
3.3 Project Objectives	3-16	Bullet #2: This is the first time "military installations" are referred to in the document. Suggest inserting a parenthetical list of the nearby military installations such as the Marine	L14-9

		Corps Logistics Base, Fort Erwin to the north, and Edwards Air Force Base to the west.	L14-9 cont.
3.5 Surrounding Land Uses	3-19	It would be helpful for the reader—when describing BIG's "surrounding" area—to point to Figure 3-14, which is an aerial of the project and its surrounding area.	L14-10
3.7.3 SBLAFCO Action A	3-38	First Paragraph: The text identifies a 10-acre parcel but the figures do not clearly show where said 10-acre parcel is located. Can it be updated to show and label this parcel? See 14 Cal. Code Reg. §15124 ("The precise location and boundaries of the proposed project shall be shown on a detailed map, preferably topographic. The location of the project shall also appear on a regional map.").	L14-11
3.7.3 SBLAFCO Action A	3-38	Second Paragraph: What is the 11-acre annexation to the Barstow Fire Protection District? The text identifies an 11-acre area but it is not labeled on any of the figures. See 14 Cal. Code Reg. §15124 ("The precise location and boundaries of the proposed project shall be shown on a detailed map, preferably topographic. The location of the project shall also appear on a regional map.").	
3.7.3 SBLAFCO Action A	3-38	Third paragraph, first bullet of SBLAFCO Action A summary: Although the discussion describes prezoning in the previous text, the first bullet clearly identifies that the 10 acres is being prezoned Business Park (BP). Therefore, it would be appropriate to also indicate that the 2,676 is being prezoned as BIG Specific Plan.	L14-12
3.7.3 SBLAFCO Action A	3-39	Fourth bullet of SBLAFCO Action A summary: The transfer of law enforcement responsibility should not be identified as a bullet under the SBLAFCO action. Rather, as discussed in the prior text, the transfer of law enforcement responsibility is a result of the annexation to the City.	L14-13
3.7.3 SBLAFCO Action B	3-39	First and second paragraphs: Nothing in the discussion indicates that the 99-acre area is being prezoned as Business Park (BP). Please clarify.	L14-14
3.7.3 SBLAFCO Action B	3-39	First bullet of SBLAFCO Action B summary: To be consistent with the summary actions outlined in SBLAFCO Action A, the first bullet should also identify that the 99 acres is being prezoned Business Park (BP).	
3.7.3 SBLAFCO Action B	3-40	Third bullet of SBLAFCO Action B summary: The transfer of law enforcement responsibility should not be identified as a bullet under the SBLAFCO action B. Rather, as discussed in the prior text, the transfer of law enforcement responsibility is a result of the annexation to the City.	L14-15

3.7.7 On-Site Utility Improvements - Water	3-58 & 3-59	The discussion on water service only relates to Golden State Water Company (GSWC). However, there is no discussion of the rationale for the annexation to Odessa Water District. As part of the discussion on water service, the EIR should note that the annexation to Odessa Water District is to provide a "back-up water supplier" in the event GSWC is unable to serve the City.	L14-16
Environmental Analysis			
5.2 Agriculture and Forestry Resources	5.2-2	Top of page, last sentence: the statement needs to be clarified. It should read: "The City will not annex lands with Williamson Act contracts as there is neither agricultural zoning <u>in the City</u> nor (is there) a mechanism for the City to continue the contract."	L14-17
5.2 Agriculture and Forestry Resources	5.2-2	5.2.2 Regulatory Setting (5.2.2.1 Federal): It appears that the federal "Farmland Protection Policy Act" has been overlooked. Suggest adding this to the Final EIR.	L14-18
5.3 Air Quality	5.3-53	5.3.4 Environmental Setting: Area Designations Nonattainment bullet: Suggest including a period from which the one violation must occur, i.e., 1, 2 or 3 years. Also, is it "State AAQS" or "State and/or Federal AAQS"?	L14-19
5.3 Air Quality	5.3-54	5.3.4 Environmental Setting: Existing Ambient Air Quality Does "CARB monitor ambient air quality" or is it MDAQMD?	
5.3 Air Quality	5.3-61	Table 5.3-14 – Sensitive Receptors – BIG Under Places of Worship-, delete 5 and 6 (VFW and Dollar General). If necessary, create a new category, i.e., "Others"	L14-20
5.4 Biological Resources	5.4-32	Critical Habitat: Suggest including the text "primary constituent elements" after "essential" in the first line.	L14-21
5.9 Hazards, Hazardous Materials, and Wildfire	5.9-3	Paragraph 2: Should the Hazardous Materials Section of San Bernardino County Fire Protection District be referenced here as it plays a major role in management of hazardous materials?	L14-22
5.9 Hazards, Hazardous Materials, and Wildfire	5.9-113	ASTs paragraph: It appears that the proposed management of aboveground storage tanks (AST) presence on the BIG site was not provided in the EIR text. Please add the management requirements to address the three properties with AST presence.	L14-23
5.11 Land Use and Planning	5.11-55	Bottom paragraph: Suggest providing more details in the explanation of why the proposed project would not prematurely convert prime agricultural lands to urban uses.	L14-24

SBLAFCO appreciates the opportunity to provide feedback on the Draft EIR. We hope these comments assist in refining the document and supporting the environmental review process. We look forward to continued coordination as the Project moves forward. L14-25

Sincerely,

SAMUEL MARTINEZ
Executive Officer

c: Tom Dodson, Tom Dodson and Associates, Environmental Consultant to LAFCO for San Bernardino County

RESPONSE TO COMMENT LETTER L14, LOCAL AGENCY FORMATION COMMISSION FOR SAN BERNARDINO COUNTY (SBLAFCO)

The City acknowledges the SBLAFCO's role as a Responsible Agency and its ability to exercise its own judgment regarding the Final EIR's adequacy in accordance with State CEQA Guidelines § 15096(e). A discussion related to the SBLAFCO's jurisdiction relevant to the Project is included in **Draft EIR Section 3.0: Project Description** and **Draft EIR Sections 5.1** through **5.17**, as appropriate. The anticipated SBLAFCO approvals are listed in **Draft EIR Table 3-16: Proposed General Plan Permits and Approvals** (page 3-92) and **Table 3-17: BIG Permits and Approvals** (page 3-93). Per CEQA, a responsible agency should provide substantive comments, supported by specific documentation, regarding those project activities within an area of expertise of the agency or that are required to be carried out or approved by the agency. (Pub. Resources Code, § 21153(c).) Consistent with this, the City has carefully reviewed SBLAFCO's comments on the Draft EIR and where necessary, revised the EIR accordingly, except as otherwise explained in the responses to comments below.

L14-1 Commenter raises some concerns about the Draft EIR's analysis that are best addressed by sharing technical and scientific information, which is provided below. This comment is an introduction to the comments provided by the Local Agency Formation Commission for San Bernardino County (SBLAFCO) and does not raise any specific issues or questions on the environmental analysis provided in the Draft EIR. The City acknowledges the SBLAFCO's role as a Responsible Agency and its ability to exercise its own judgment regarding the adequacy of the Final EIR in accordance with State CEQA Guidelines § 15096(e). A discussion related to the jurisdiction of SBLAFCO relevant to the Project site is included in **Draft EIR Section 3.0: Project Description**, and **Draft EIR Section 5.11: Land Use and Planning**. Anticipated required approvals anticipated by SBLAFCO are listed in **Draft EIR Table 3-16: Proposed General Plan Permits and Approvals** (page 3-92) and **Table 3-17: BIG Permits and Approvals** (page 3-93).

L14-2 As discussed in **Draft EIR Section 3.0: Project Description**, the proposed General Plan and Barstow International Gateway (BIG) projects, collectively referred to as the "Project, are described in detail. Specifically, proposed General Plan components are described on Draft EIR pages 3-25 through 3-42 and BIG components are described on pages 3-42 through 3-85. These Project components are consistently identified and referenced throughout the Draft EIR and are evaluated under distinct subheadings within each environmental topic area. Accordingly, the Draft EIR provides a comprehensive and organized analysis of the full Project, consistent with CEQA requirements. This comment does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no revisions to the Draft EIR are required.

L14-3 The Project includes a comprehensive update to the City of Barstow 2015-2020 General Plan, which is a long-term blueprint for the improvements needed to accommodate the City's growing population over a 25-year planning horizon. The proposed General Plan is analyzed as a project component and is attached to **Draft EIR Appendix 3.0 GP-1: Proposed General Plan**. This comment does not raise any specific issues or questions on the environmental analysis provided in the Draft EIR. No changes to the Draft EIR are needed.

L14-4 The Project Summary is intended as a high-level overview and does not restate all defined terms. See **Draft EIR Section 3.0: Project Description,** specifically **Section 3.7: Project Components**, for a full description of the proposed General Plan and BIG. SBLAFCO Actions A and B are described under the proposed General Plan heading on Draft EIR pages 3-38 through 3-41 and include a clear and complete outline of specific reorganizations, annexations, and detachments. BIG's components are described under the Barstow International Gateway heading on Draft EIR page 3-42, including the BIG Specific Plan which would establish the site-specific zoning and development standards and framework for future development within the BIG Specific Plan area. BIG's components include the rail yard (**Draft EIR Section 3.7.5**), transload warehouse center (**Draft EIR Section 3.7.6**), utility improvements, including stormwater (**Draft EIR Section 3.7.7**), and on-site utility and circulation improvements (**Draft EIR Sections 3.7.7** and **3.7.8**, respectively). The rail yard would be entirely within BIG Specific Plan area.

Project components are consistently identified and referenced throughout the Draft EIR and are evaluated under distinct subheadings within each environmental topic area. Accordingly, the Draft EIR provides a comprehensive and organized analysis of the full Project, consistent with State CEQA Guidelines. Per the comment, to provide further clarification, the Executive Summary has been revised as follows (additions are underlined and deletions are crossed out). These revisions are clarifying in nature and the conclusions of Draft EIR remain valid.

Draft EIR Section 1.3, (pages 1-1 and 1-2) are revised as shown below and as shown in **Final EIR Section 3.0: Errata to the Draft EIR**.

> The proposed Project also includes two proposed Local Agency Formation Commission for San Bernardino County (SBLAFCO) Actions (SBLAFCO Actions A and B) that involve reorganizations to include annexations~~,~~ and detachments~~, and reorganizations~~. "Annexation" refers to the process where a city boundary is extended to include certain property, or the service boundary for a utility or public service (e.g., police, fire) is ~~extended~~ expanded to include a certain property. "Detachment" refers to the exclusion, deletion, or removal from a city or district of any portion of the territory of that city or district.
>
> The proposed SBLAFCO Action A consists of 2,676 acres that are part of the proposed BIG Specific Plan area and an additional approximately 10-acre parcel; SBLAFCO Action B comprises six parcels totaling 99 acres. Each of these is described in greater detail in Section 3.7.3. For the proposed Project, a single SBLAFCO Action can include multiple requests (bringing a property into City limits could also include removing ~~a~~ property from the County of San Bernardino [County] Fire Protection District ~~fire service jurisdiction~~ and bringing the property into the City of Barstow Fire Protection District for fire service ~~jurisdiction~~), which is referred to as a "Reorganization." Although the City is responsible for assigning a zone district in advance of a SBLAFCO application (i.e., "prezoning"), as well as completing the environmental analysis for the SBLAFCO reorganization and associated LAFCO actions ~~(SBLAFCO Actions A and B)~~, SBLAFCO would independently evaluate and determine ~~consider~~ whether to approve the requested actions.

Draft EIR Section 1.3.1.1: Proposed General Plan (page 1-3) has been revised as shown below and as shown in **Final EIR Section 3.0: Errata to the Draft EIR**.

> The proposed Project also includes two proposed ~~San Bernardino County Local Agency Formation Commission (~~SBLAFCO~~)~~ actions (SBLAFCO Actions A and B) (reorganizations to include annexations~~,~~ and detachments~~, and reorganizations~~). Two separate application requests of the two areas within the City's SOI for SBLAFCO Actions A and B would be submitted to SBLAFCO; SBLAFCO Action A includes a portion of the BIG Specific Plan area currently within the SOI.

L14-5 **Draft EIR Appendix 5.11 BIG-1 Economic and Fiscal Impact Analysis** contains the full economic impact calculations. As discussed in **Draft EIR Table 3-12: Estimated Employment – BIG** (page 3-51), "based on industry standard and the modeling software used, AECOM expresses construction jobs in terms of total full-time equivalents (i.e., if one person is employed during construction for two years of BIG's construction, it would be shown as two jobs). To support the environmental analysis, all construction jobs were converted to annual headcount."

L14-6 Per the comment, to provide further clarification, the first paragraph on Draft EIR page 1-10 has been revised in the **Final EIR Section 3.0: Errata to the Draft EIR** to include a reference to the corresponding appendix containing the Market Analysis (i.e., **Draft EIR Appendix 8.0 BIG-1: Alternative Market Analysis** ("Market Analysis"), as presented below. These revisions are clarifying in nature and the conclusions of the Draft EIR remain valid.

> Although the development presented in the table is allowed, it is highly unlikely that this area would be developed to this maximum capacity within the Horizon Year (2048) based on **Draft EIR Appendix 8.0 BIG-1: Alternative Market Analysis** ("Market Analysis") ~~the Market Analysis that was conducted~~.

L14-7 See **Response L14-4** concerning the BIG Project Summary**.**

L14-8 This section of the Project Description is intended to provide a brief overview of BIG and to identify the general location of proposed improvements. As noted in the first sentence of the referenced paragraph, detailed analysis of the environmental setting and extent of impacts related to the Lenwood Channel is provided in **Draft EIR Section 5.10: Hydrology and Water Quality**, **Figure 5.10-1: Surface Water Study Area – BIG** (page 5.10-16). In addition, **Draft EIR Section 3.7: Project Components** (page 3-66) describes the on-site BIG stormwater improvements and associated Lenwood Channel widening as depicted on **Draft EIR Figure 3-24: BIG Proposed Stormwater Improvements** (page 3-67). Channel widening outside the BIG Specific Plan area is described in **Draft EIR Section 3.0: Project Description** (page 3-79) and depicted in **Draft EIR Figure 3-31: Main Street at Lenwood Channel Bridge Reconstruction** (page 3-80). Accordingly, the Draft EIR provides sufficient descriptive and graphic information to allow the reader to understand the location and extent of the proposed improvements. This comment does not raise a specific issue with the adequacy of

the Draft EIR or raise any other CEQA issue. Therefore, no revisions to the Draft EIR are required.

L14-9 The Project Objectives are intended to provide a high-level statement of the Project's purpose and need and do not include detailed contextual descriptions. Identification of specific nearby military installations is not required for purposes of defining Project Objectives. Nearby military facilities are referenced under **Draft EIR Section 3.5: Surrounding Uses** (page 3-19). This comment does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no revisions to the Draft EIR are required.

L14-10 **Draft EIR Figure 3-14: SBLAFCO Action Area A: City and Odessa Water District Annexation** (page 3-35) is intended to illustrate the San Bernardino Local Agency Formation Commission Action Area A, including the City and Odessa Water District annexation area, and does not depict the full extent of BIG's surrounding land use setting. As such, referencing **Draft EIR Figure 3-14** in this section would not accurately represent the surrounding area. This comment does not raise any specific issues or questions on the environmental analysis provided in the Draft EIR.

L14-11 To improve clarity and consistency with State CEQA Guidelines Section 15124, the figures included in **Draft EIR Section 3.7.3** have been revised to clearly depict and label the location and boundaries of the referenced 10-acre parcel and the 11-acre parcel. These revisions are clarifying in nature and do not change the Project Description or the environmental analysis, and the Draft EIR conclusions remain valid.

L14-12 This is noted in the first paragraph, "Nearly all of this area, approximately 2,676 acres, would be annexed and designated as Industrial in the proposed General Plan and prezoned as BIG Specific Plan (to be prezoned as BIG Specific Plan)".

L14-13 Text regarding law enforcement responsibility has been removed in the context of the LAFCO action.

Draft EIR Section 3.0 (page 3-40) has been revised as shown below and as shown in **Final EIR Section 3.0: Errata to the Draft EIR**. These revisions are clarifying in nature and the Draft EIR conclusions remain valid.

- ~~Transfer of law enforcement responsibility from the San Bernardino County Sheriff's Department to the City of Barstow Police Department of approximately 99 acres;~~ and

L14-14 Per the comment, to provide further clarification, the revisions to **Draft EIR Section 3.0** (page 3-39) identified below have been made and included in **Final EIR Section 3.0: Errata to the Draft EIR**. These revisions are clarifying in nature and the conclusions of the Draft EIR remain valid.

SBLAFCO Action B

SBLAFCO Action B would be a "reorganization" under the CKH Act that would include three actions: annexation to the City of Barstow of approximately 99 acres (expansion); annexation to the Odessa Water District of approximately 99 acres; and detachment from County Service Area 70 of approximately 99 acres (reduction). As a result of the LAFCO actions, a concurrent transfer of law enforcement responsibility of approximately 99 acres from the San Bernardino County Sheriff's Department to the City of Barstow Police Department. The City of Barstow proposes to annex approximately 99 acres south of Main Street and west of Delaney Road into the City to prevent the creation of an unincorporated island resulting from SBLAFCO Action A. All parcels within this annexation area are currently County-designated Rural Living. The parcels would be designated in the proposed General Plan and prezoned ~~Zoning Map~~ as the new Business Park (BP), which primarily permits office and low-impact industrial (non-truck intensive) uses. Additionally, given the presence of existing homes, the new Business Park (BP) General Plan land use designation and zoning would allow for legacy residential uses to remain and a limited number of new homes developed subject to specific conditions identified in Barstow Code § 19.17.160 (proposed BP Zone District).

….

In summary, SBLAFCO Action B would involve a "reorganization" under the CKH Act that would include the following actions:

Annexation to the City of Barstow of approximately 99 acres (expansion), to be prezoned as Business Park (BP);

L14-15 Per the comment, the following text regarding law enforcement responsibility has been omitted in the context of the LAFCO action.

Draft EIR Section 3.0: Project Description (page 3-39) has been revised as shown below and as shown in **Final EIR Section 3.0: Errata to the Draft EIR**. These revisions are clarifying in nature and the conclusions of the Draft EIR remain valid.

- ~~Transfer of law enforcement responsibility from the San Bernardino County Sheriff's Department to the City of Barstow Police Department of approximately 2,686 acres;~~

L14-16 As noted by SBLAFCO, Draft EIR pages 3-58 have been revised as follows. These revisions are clarifying in nature and the conclusions of the Draft EIR remain valid.

BIG's construction workers would generate demand for potable water during the construction phase. BIG is within the Golden State Water Company (GSWC) service area. Additionally, BIG would be annexed into Odessa Water District to provide backup water in the event GSWC is unable to serve Annexation Area A or B.

L14-17 The Draft EIR adequately explains the City's relationship to agricultural lands. As stated earlier in the same paragraph referenced in the comment, there is no zoning for agricultural use within the City. This comment does not raise any specific issues or questions on the environmental analysis provided in the Draft EIR.

L14-18 For clarification of the Federal regulatory framework, **Draft EIR Section 5.2.2.1: Federal** (page 5.2-2) would be revised as shown below and as shown in **Final EIR Section 3.0: Errata to the Draft EIR**. These revisions are clarifying in nature and do not raise any specific issues or questions on the environmental analysis, and the conclusions of the Draft EIR remain valid.

~~There are no federal regulations concerning agriculture and forestry resources that are applicable to the Project.~~

Farmland Protection Policy Act (FPPA) (7 United States Code [USC] Section 4201)

The purpose of the Farmland Protection Policy Act (FPPA) is to minimize the extent to which federal programs contribute to the unnecessary and irreversible conversion of farmland to nonagricultural uses. It also directs Federal programs to be compatible with State and local policies for the protection of farmland. Under the FPPA, the term "farmland" includes Prime Farmland, Unique Farmland, and Farmland of Statewide or Local Importance. Farmland that is subject to FPPA requirements does not have to be currently used as cropland. It can be forestland, pastureland, or other land but not urban and built-up land or water. FPPA assures that, to the extent possible, federal programs are administered to be compatible with State and local units of government, and private programs and policies to protect farmland.

In 1981, Congress passed the Agriculture and Food Act (Public Law 97-98) which contained the FPPA, Subtitle I of Title XV, Sections 1539-1549. The final rules and regulations were published in the Federal Register on June 17, 1994. Federal agencies are required to develop and review their policies and procedures related to implementing the FPPA every two years.

The FPPA does not authorize the Federal government to regulate the use of private or nonfederal land or in any way affect the property rights of owners. Projects are subject to FPPA requirements if they irreversibly convert farmland (directly or indirectly) to non-agricultural use and are completed by a Federal agency or rely on assistance from a Federal Agency such as the United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS).

L14-19 Both of these statements as written are correct. No revision is needed.

L14-20 See below revision to clarify that the two noted land uses are "Other."

Draft EIR Section 5.3: Air Quality (pages 5.3-60 and 5.3-61) has been revised as shown below and as shown in **Final EIR Section 3.0: Errata to the Draft EIR**. These revisions are clarifying in nature and the conclusions of the Draft EIR remain valid.

Table 2.1-1: Sensitive Receptors – BIG			
Receptor ID	**Receptor Description**	**Location**	**Distance and Direction from BIG[1]**
Residential Receptors – West Lead Receptor Area			
W1	Single-Family Residences	Along Indian Trail, approximately 2,500 feet north of National Trails Highway	1,000 feet south
W2	Single-family Residences	Along Indian Trail, northeast of the Indian Trail and Lords Road Intersection	700 feet north
W3	Single-family Residences	Along Main Street, approximately 500 feet west of Hodge Road	240 feet south
W4	Single-family Residences	Along Main Street, approximately 400 feet east of Hodge Road	600 feet south
W5	Single-family Residences	Along Hodge Road, east of the Main Street and Hodge Road intersection	950 feet south
W6	Single-family Residences	Along Main Street, approximately 1,500 feet northeast of Hodge Road	350 feet south
W7	Single-family Residences	Along Main Street, approximately 5,680 feet southwest of Buckboard Road	360 feet southeast
W8	Single-family Residences	Along Main Street, approximately 4,400 feet southwest of Buckboard Road	340 feet southeast
Residential Receptors – Block Swap/Intermodal Receptor Area			
R1	Single-family Residences	Along Main Street, approximately 1,500 feet north of Buckboard Road	720 feet southeast
R2	Single-family Residences	Along Main Street, approximately 3,000 feet northeast of Buckboard Road	530 feet southeast
R3	Single-family Residences	Along Main Street, approximately 2,400 feet west of Prairie Avenue	500 feet southeast
R4	Single-family Residences	Along Main Street, approximately 2,175 feet west of Prairie Avenue	330 feet southeast
R5	Single-Family Residences	At the intersection of Prairie Avenue and Spinet Street	2,850 feet southeast
R6	Single-family Residences	Along Gazana Street, approximately 245 feet west of Sylvan Avenue	570 feet southeast
R7	Single-family Residences	Along Amarylis Avenue, approximately 480 feet south of Main Street	570 feet southeast
Residential Receptors – East Lead Receptor Area			
E1	Single-family Residences	Along Sweeten Lane, approximately 800 feet east of National Trails Highway	1,600 feet southeast
E2	Single-family Residences	Along Main St, approximately west of Sun Valley Drive	760 feet southeast

Table 2.1-1: Sensitive Receptors – BIG			
Receptor ID	**Receptor Description**	**Location**	**Distance and Direction from BIG[1]**
E3	Single-family Residences	Along Main Street, approximately 1,700 Sun Valley Drive	610 feet southeast
E4	Single-family Residences	Along Main St, approximately 910 feet west of Sun Valley Drive	580 feet southeast
E5	Single-family Residences	At the intersection of Main Street and Holland Street	640 feet southeast
E6	Single-family Residences	Intersection of Main Street and Holland Street	380 feet south
E7	Single-family Residences	Intersection of Jade Road and Walnut Street	4,200 feet north
E8	Single-family Residences	Along Jasper Road, approximately 380 feet west of Birch Road	300 feet north
E9	Single-family Residences	Along Main Street, approximately 200 feet north of Anderson Avenue	440 feet south
E10	Single-family Residences	Southeast of Main Street and Avenue H	9,000 feet southeast
Along 33 kV Line			
T1	Single-family Residences	Surrey Court, North of Surrey Road and Surrey Court	100 feet south
T2	Single-family Residences	Along Rimrock Road, approximately 90 feet east of L Street	120 feet east
T3	Single-family Residences	Along J Street, approximately 80 feet south of Bonanza Road	100 feet south
Schools			
1	Lenwood Elementary School	Along Ash Road, approximately 500 feet south of Main Street	520 feet southeast
Places of Worship			
2	Landmark Missionary Baptist Church	Along Cedar Road, approximately 530 feet north of Jasper Road	1,080 northeast
3	St. Philip Neri Catholic Church	Along 3rd Street, approximately 400 feet east of Paris Avenue	1,670 feet southeast
4	Lenwood Community Church	Along Main Street, approximately 95 feet west of Woods Avenue	230 feet south
Other			
5	Veterans of Foreign Wars	Intersection of Main Street and Frank Street	140 feet south
6	Dollar General	Along Main St, west of Ash Road	125 feet south
Parks			
7	Jasper Park	Along Jasper Road, approximately 290 feet east of Birch Road	Adjacent to the northeast

Table 2.1-1: Sensitive Receptors – BIG			
Receptor ID	**Receptor Description**	**Location**	**Distance and Direction from BIG[1]**
8	Lenwood Park	Along Ash Road, approximately 960 feet south of Main Street	960 feet to the southeast
Note: Distances are measured from the closest sensitive receptor to the closest point of BIG. Inclusion in this table does not necessarily denote that significant impacts would occur at these locations.			
W = West Lead Residential Receptor Area; R = Residential Receptors near the Block Swap and Intermodal Facilities; E = East Lead Residential Receptor Area; T = Along 33 kV Transmission Line			
Source: Google Inc. 2024. Google Earth Pro.			

L14-21 The suggested revision regarding terminology is stylistic in nature and do not affect the environmental analysis or conclusions of the Draft EIR; therefore, no revisions to the Draft EIR are required.

L14-22 In **Draft EIR Section 5.9.2: Regulatory Setting,** San Bernardino County Fire Protection District is referenced and included under the subheading **Section 5.9.2.4: Local** (page 5.9-25). This comment does not raise any specific issues or questions on the environmental analysis provided in the Draft EIR.

L14-23 Procedures for identification, handling, reporting, and removal of the known or unknown ASTs/USTs, piping, dispensers, or other storage tank components that may be encountered are included in **MM BIG HAZ-3**.

L14-24 See **Draft EIR Section 5.11: Land Use and Planning**, which includes an explanation for why farmland conversion would not be premature, "*While the proposed General Plan would convert Prime Agricultural Land to urban uses, this conversion would not be premature because no Williamson Act contracts would be cancelled as a result of the proposed General Plan, and BIG is already contemplated in the State's 2024 Rail Plan for freight system improvements statewide*." For clarification, the following also was added to the last paragraph on **Draft EIR Section 5.11: Land Use and Planning** (page 5.11-55) and has been revised as shown below and as shown in **Final EIR Section 3.0: Errata to the Draft EIR.**

> In addition, see Appendix 5.11 GP-1: Proposed General Plan SBLAFCO Cortese-Knox Hertzberg Local Government Reorganization Act, Section 2.0 – 2.2.

These revisions are clarifying in nature and do not raise any specific issues or questions on the environmental analysis, and the conclusions of the Draft EIR remain valid.

L14-25 This comment provides a conclusion to the letter from SBLAFCO. See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER L15

BARSTOW UNIFIED SCHOOL DISTRICT
BUSD
Your Best Choice for Academic Success!
551 South Avenue H Barstow, CA 92311 Phone (760) 255-6000 FAX (760) 255-8965 www.busdk12.com

As Superintendent for Barstow Unified School District, I want to express my full support for the BNSF Barstow International Gateway (BIG) project.

The BNSF BIG project serves as a great opportunity for the students, families and employees of Barstow Unified School District and for the city of Barstow and surrounding communities.

In addition, the state of California and the national supply chain will benefit from this worthwhile project. BNSF BIG will keep products moving smoothly and create many high-paying jobs for our area.

L15-1

By transporting more freight by train instead of over-the-road trucks, the BNSF BIG project will provide important benefits for residents, particularly a reduction in traffic along the two interstates, 15 and 40, as well as Highway 58, passing through Barstow and the surrounding areas.

The BNSF Big project will use newer, cleaner equipment (locomotives) that makes this project even better for the region.

The BNSF BIG project is a smart investment for Barstow and the nation, and I encourage its move forward.

Sincerely,

Deanna Swearingen
Superintendent
Barstow Unified School District

City of Barstow
Received:
JAN 7 2026
Initial:
City Clerk Services

RESPONSE TO COMMENT LETTER L15, BARSTOW UNIFIED SCHOOL DISTRICT

L15-1 Thank you for your comment. See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER L16

L16

SCE COMMENTS - CITY OF BARSTOW'S GENERAL PLAN UPDATE, BIG PROJECT & SPECIFIC PLAN, AND ZONING AMENDMENTS PROJECT

Rey Gonzales <Rey.Gonzales@sce.com>

Fri 1/9/2026 1:32 PM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

Importance: High

1 attachments (144 KB)

SCE_City of Barstow GP and BIG Project DEIR Comments_FINAL_20260109.pdf;

[NOTICE: THIS IS AN EXTERNAL EMAIL]
Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!

Caution! This message was sent from outside your organization.

Dear City of Barstow,

Southern California Edison (SCE) is pleased to submit the following DEIR comments (see attachment) on the City of Barstow's General Plan Update, BIG Project & Specific Plan and Zoning Amendments Project (Project) during the public review process. The proposed Project is (a) a comprehensive update to the City of Barstow 2015-2020 General Plan (2015 General Plan) to bring it current with State laws; (b) BIG; and (c) the BIG Specific Plan. The proposed Project also includes planning for the City's overall long-term development. The BIG Specific Plan proposes to create a 4,300-acre modern rail facility that includes 9.0 million square feet of transload warehousing, with fully- and hybrid-electric equipment shifting and reconfiguring train loads based on their destination. L16-1

SCE must ensure that requirements of all applicable environmental laws and regulations are addressed, necessary environmental surveys and studies are performed, and all required state and federal permits are applied for and secured from various regulatory agencies before commencement of construction activities, even if no license is required from the CPUC. The Project's EIR should describe and analyze the entirety of SCE's scope of work, including but not limited to, distribution facilities and relocations or modifications of existing electrical facilities to minimize the risk of another public agency needing to complete additional and separate environmental review at a later time. L16-2

SCE appreciates the opportunity to comment on the DEIR for the City of Barstow Proposed General Plan and BIG Project. SCE looks forward to working and consulting with the City of Barstow. If you have any questions regarding the attached letter, please contact me. L16-3

Thank you,

Rey Gonzales, MPA
Sr. Project Manager, Environmental

Environmental, Health, Safety, and Quality (EHSQ)|Environmental Department
626-419-1545 | Email. rey.gonzales@sce.com

General Office 1| 2244 Walnut Grove Avenue |Quad 2C, 258CL |Rosemead, CA, 91770



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Please consider the environment before printing this e-mail.

SOUTHERN CALIFORNIA EDISON

January 9, 2026

Sent via electronic mail to generalplan@barstowca.org

City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

Re: Draft Environmental Impact Report (DEIR) Comments for City of Barstow General Plan Update, Barstow International Gateway (BIG) Project & Specific Plan and Zoning Amendments Project

Dear City of Barstow,

Southern California Edison (SCE) is pleased to submit the following DEIR comments on the City of Barstow's General Plan Update, BIG Project & Specific Plan and Zoning Amendments Project (Project) during the public review process. The proposed Project is (a) a comprehensive update to the City of Barstow 2015-2020 General Plan (2015 General Plan) to bring it current with State laws; (b) BIG; and (c) the BIG Specific Plan. The proposed Project also includes planning for the City's overall long-term development. The BIG Specific Plan proposes to create a 4,300-acre modern rail facility that includes 9.0 million square feet of transload warehousing, with fully- and hybrid-electric equipment shifting and reconfiguring train loads based on their destination. L16-4

- **SCE's Electrical Facilities**

  SCE provides electric service in the City of Barstow and maintains electrical transmission and distribution facilities, as well as substations and supporting appurtenances in the city. L16-5

- **Encroachment of SCE's Right-of-Way and Access Roads**

  The proposed Project should not impose constraints on SCE's ability to access, maintain, and operate its current and future facilities. Additionally, if bike lanes and landscaping are planned within SCE's corridors an agreement between the developer and SCE is required. Any parkways or pathways (either by foot, bicycles, or other means) that invite the public onto SCE's right-of-way will require the installation of fencing and/or Climbing Discouragers on each transmission line tower at the customer's expense. L16-6

  SCE's rights-of-way and fee-owned properties are purchased for the exclusive use of SCE to operate and maintain its present and future facilities. SCE will review any proposed use on a case-by-case basis. Approvals or denials will be in writing based upon review of the maps provided by the developer and compatibility with SCE right-of-way constraints and rights. L16-7

Please forward five (5) sets of plans depicting SCE's facilities and associated land rights to the following location:

Rights-of-Way Analysis Department
Southern California Edison Company
2 Innovation Way
Pomona, CA 91768

L16-7 cont'd

- **General Order 131-E**

The California Public Utilities Commission (CPUC) has sole and exclusive jurisdiction over the siting and design of public utility electric facilities located in the State of California. Pursuant to CPUC General Order 131-E, Section XI.B, "Local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations, or electric facilities constructed by public utilities subject to the CPUC's jurisdiction. However, in locating such projects, the public utilities shall consult with local agencies regarding land use matters."

L16-8

In addition, SCE's construction, modification, and relocation of transmission lines, or electrical facilities that are designed to operate at or above 50 kilovolts (kV) may be subject to permitting requirements under General Order 131-E. Since the Project involves the construction, modification, and/or relocation of transmission lines and related components, such scope of work should be identified and discussed in the EIR. If not, SCE may be required to pursue a separate, mandatory CEQA review through the CPUC, which could delay approval of SCE portions of the project for two years or longer.

L16-9

- **General Order 95**

SCE must comply with General Order (GO) 95, which establishes rules and regulations for the overhead line design, construction, and maintenance. GO 95 also includes vertical clearance requirements from thoroughfares, ground, and railroads, as well as specific minimum clearances from tree branches and vegetation around overhead wires. Any landscaping related to the project should not conflict with SCE's existing and proposed transmission line designs.

L16-10

SCE must ensure that requirements of all applicable environmental laws and regulations are addressed, necessary environmental surveys and studies are performed, and all required state and federal permits are applied for and secured from various regulatory agencies before commencement of construction activities, even if no license is required from the CPUC. The Project's EIR should describe and analyze the entirety of SCE's scope of work, including but not limited to, distribution facilities and relocations or modifications of existing electrical facilities to minimize the risk of another public agency needing to complete additional and separate environmental review at a later time.

L16-11

SCE appreciates the opportunity to comment on the DEIR for the City of Barstow Proposed General Plan and BIG Project. SCE looks forward to working and consulting with the City of Barstow. If you have any questions regarding this letter, please contact me at rey.gonzales@sce.com or 626.419-1545. L16-12

Sincerely,

Rey Gonzales, Sr. Environmental Project Manager
Southern California Edison
2244 Walnut Grove
Rosemead, CA 91770

RESPONSE TO COMMENT LETTER L16, SOUTHERN CALIFORNIA

L16-1 Thank you for your comment. While the comment does not raise any issue regarding the Draft EIR, it is provided in the Final EIR for the decision makers.

L16-2 Southern California Edison (SCE) comments that the EIR should describe and analyze the entirety of SCE's scope of work, including but not limited to, distribution facilities and relocations or modifications of existing electrical facilities to minimize the risk of another public agency needing to complete additional and separate environmental review at a later time. The proposed General Plan update is a plan-level document that guides future land use development; however, project-level detail for utility infrastructure upgrades citywide are not known at this time. Nonetheless, BIG would require the construction of new or modifications to existing electrical infrastructure, including substations, distribution lines, and back-up power generation, which is discussed in greater detail in Appendix 5.3 of the Draft EIR and included in the BIG technical analyses for Air Quality, Greenhouse Gas Emissions, and Energy. This comment is noted; no edits to the Draft EIR are warranted.

L16-3 Thank you for your comment. While the comment does not raise any issue regarding the Draft EIR, it is provided in the Final EIR for the decision makers.

L16-4 Thank you for your comment. While the comment does not raise any issue regarding the Draft EIR, it is provided in the Final EIR for the decision makers.

L16-5 Thank you for your comment. While the comment does not raise any issue regarding the Draft EIR, it is provided in the Final EIR for the decision makers.

L16-6 SCE comments that BIG should not impose constraints on SCE's ability to access, maintain, and operate its current and future facilities, and that installation of fencing or Climbing Discouragers will be required on each transmission line at the customer's expense should BIG invite the public onto SCE's rights-of-way. This comment is noted; no edits to the Draft EIR are warranted.

L16-7 Thank you for your comment. While the comment does not raise any issue regarding the Draft EIR, it is provided in the Final EIR for the decision makers.

L16-8 Thank you for your comment. While the comment does not raise any issue regarding the Draft EIR, it is provided in the Final EIR for the decision makers.

L16-9 SCE comments that any construction, modification, and relocation of transmission lines or electrical facilities that are designed to operate at or above 50 kilovolts (kV) may be subject to permitting requirements under CPUC General Order 1310E and that such work should be identified and discussed in the EIR. As discussed in greater detail in Appendix 5.3 of the Draft EIR, BIG would include a 21 Megawatt (MW) solar farm that could meet this criteria. This comment is noted; no edits to the Draft EIR are warranted.

L16-10 SCE comments that any landscaping related to the project should not conflict with SCE's existing and proposed transmission line designs in relation to General Order 95, which include

clearance requirements from built and vegetation features. This comment is noted; no edits to the Draft EIR are warranted.

L16-11 Thank you for your comment. While the comment does not raise any issue regarding the Draft EIR, it is provided in the Final EIR for the decision makers.

L16-12 Thank you for your comment. While the comment does not raise any issue regarding the Draft EIR, it is provided in the Final EIR for the decision makers.

COMMENT LETTER L17

L17

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:
cheldreth@barstowca.org
generalplan@barstowca.org
Chris Heldreth, Community Development Director
City of Barstow
220 E. Mountain View Street, Suite A
Barstow, CA 92311

January 9, 2026

Re: Draft Environmental Impact Report (DEIR) for the City of Barstow Proposed General Plan Update and Barstow International Gateway Project (SCH No.: 2024020501)

Dear Mr. Heldreth,

The South Coast Air Quality Management District (South Coast AQMD) appreciates the opportunity to comment on the above-referenced document. South Coast AQMD is the regulatory agency responsible for controlling emissions primarily from stationary sources of air pollution within the four-county South Coast Air Basin (Basin) which is comprised of all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties, and the Riverside County portion of the Salton Sea Air Basin and the non-Palo Verde, Riverside County portion of the Mojave Desert Air Basin (MDAB). The City of Barstow (City) is the California Environmental Quality Act (CEQA) Lead Agency for the City of Barstow Proposed General Plan Update and Barstow International Gateway (BIG) Project (Proposed Project). L17-1

The Proposed Project focuses on goods-movement activities via rail and truck transportation throughout Southern California, including within the South Coast AQMD jurisdiction. As described in the DEIR, most of the freight associated with the Proposed Project would travel to or from the Ports of Los Angeles and Long Beach through the South Coast AQMD region via rail corridors affecting communities throughout the region. Also, truck trips to and from the South Coast AQMD region would travel to and from the BIG facility, where intermodal transfer and logistics operations would occur. While the BIG facility is located outside of South Coast AQMD's jurisdiction, the transportation component would generate regional rail operations, and affect port-related drayage, and heavy-duty truck activity within the region under South Coast AQMD jurisdiction by linking port terminals, railyards, and major transportation corridors to the inland logistics hub. Implementation would occur incrementally over the planning horizon as infrastructure, rail capacity, and supporting development are constructed. L17-2

South Coast AQMD staff reviewed the DEIR with a focus on potential air quality and public health impacts associated with increased rail, truck, and goods-movement activity occurring within South Coast AQMD's entire jurisdiction. We appreciate the Proposed Project's intent to move freight more efficiently and to reduce emissions within South Coast AQMD's jurisdiction. The DEIR relies on several key assumptions regarding truck displacement, locomotive technology, emissions modeling, and future baseline conditions and concludes that the Proposed Project would not result in significant adverse air quality impacts within the Basin. As discussed in the attached detailed comments, several substantive technical and legal deficiencies have been identified which need to be addressed in the Final EIR to ensure compliance with CEQA, provide full disclosure of potential impacts, and identify feasible and enforceable mitigation measures where significant impacts may occur. L17-3

Several areas in the DEIR have been identified as not having adequate support for its conclusions or full disclosure of the potential air quality and public health impacts associated with the Proposed Project. In particular, the DEIR relies on speculative assumptions that increased rail activity would displace truck travel and generate net emission reductions in the Basin, without substantial evidence or enforceable mechanisms to ensure that such displacement will occur or that Tier 4 or cleaner locomotives will be used as assumed. Absent these assumptions, the Proposed Project would result in significant emission increases within the Basin at levels that would exceed South Coast AQMD air quality significance thresholds such that mitigation would be required. Mitigation measures should include enforceable requirements to use Tier 4 locomotives as projected in this DEIR, and to monitor the development of zero-emission (ZE) locomotives and begin converting their captive fleet between the ports and Barstow to ZE when these locomotives become available, at a rate of about 10 percent per year. South Coast AQMD would like to work with the City and BNSF to develop appropriate and effective mitigation measures to minimize air quality and public health impacts in the Basin. L17-4

The comments also note opportunities and suggestions to improve the consistency of the analyses within the DEIR, especially between the transportation and air quality analyses, clarify baseline assumptions, and enhance the transparency of the emission inventories relied upon for conducting air dispersion modeling. Suggestions to strengthen the analysis are also included which recommend: 1) evaluating the secondary effects of the Proposed Project, such as potential traffic delay and idling associated with increased rail activity; 2) updating the emissions modeling assumptions; 3) ensuring consistency with applicable state and regional climate and freight policies; 4) evaluating localized health impacts; 5) incorporating new and further refining proposed mitigation measures to ensure they are feasible and effective over the long operational life of the Proposed Project. L17-5

In conclusion, the Lead Agency is recommended to address these concerns in the Final EIR. Thank you for the opportunity to provide comments. South Coast AQMD staff are available to work with the Lead Agency to address any air quality-related questions that may arise. Please contact me at swang1@aqmd.gov should you have any questions. L17-6

Sincerely,

Sam Wang

Sam Wang
Program Supervisor, CEQA IGR
Planning, Rule Development & Implementation

CC:
Michael Krause, South Coast AQMD
Ian MacMillan, South Coast AQMD
Barbara Baird, South Coast AQMD
Barbara Radlein, South Coast AQMD

MK:IM:BB:BR:SW
ODP251113-08
Control Number

South Coast AQMD Comments

To provide context, South Coast AQMD has provided a brief summary of the Proposed Project information and prepared the following comments, organized by topic of concern.

Summary of Proposed Project Information in the DEIR

Based on the DEIR, the Proposed Project consists of a General Plan Update for the City of Barstow and seeks adoption of the Barstow International Gateway (BIG) Specific Plan, which together establishes a long-range land use and transportation framework to guide future growth, infrastructure investment, and goods-movement activities through buildout. The planning horizon extends approximately 20-25 years, with full buildout anticipated around 2040-2048. The General Plan Update seeks to revise most policy elements (excluding the housing element) to accommodate substantial increases in residential, employment, and industrial development, while coordinating land use, circulation, and regional mobility objectives.[1] L17-7

The BIG Specific Plan is a central component of the Proposed Project and would allow development of a large-scale rail-served intermodal logistics hub anchored by an intermodal facility owned and operated by the Burlington Northern Santa Fe (BNSF) Railway, along with supporting warehouse, distribution, and freight-related uses. The Specific Plan area encompasses several thousand acres within the City of Barstow and proposed annexation areas, and is intended to facilitate the building of trains through block swapping and the transfer of goods between rail and truck modes through on-site transloading and intermodal operations. The Proposed Project would accommodate millions of square feet of new logistics and industrial development, supporting regional and national goods movement while positioning Barstow as a major inland freight gateway. L17-8

The Proposed Project focuses on goods-movement activities via rail and truck transportation throughout Southern California, including within the South Coast AQMD jurisdiction. As described in the DEIR, most of the freight associated with the BIG Project would travel to or from the Ports of Los Angeles and Long Beach through the South Coast AQMD region via rail corridors affecting communities throughout the region. Also, truck trips to and from the South Coast AQMD region would travel to and from the BIG facility, where intermodal transfer and logistics operations would occur. While the BIG facility is located outside of South Coast AQMD's jurisdiction, the transportation component would generate regional rail operations, and affect port-related drayage, and heavy-duty truck activity within South Coast AQMD jurisdiction by linking port terminals, railyards, and major transportation corridors to the inland logistics hub. Implementation would occur incrementally over the planning horizon as infrastructure, rail capacity, and supporting development are constructed. L17-9

South Coast AQMD staff reviewed the DEIR with a focus on the air quality analysis and how the Proposed Project may affect the region within South Coast AQMD jurisdiction. Please see the following detailed comments. L17-10

[1] DEIR. p. 1-3.

I. The DEIR Lacks Substantial Evidence to Support the Assumption that Emission Reductions Will Occur Because Train Traffic Will Replace Truck Traffic

According to the DEIR, once operational, the Proposed Project claims that fewer ozone and particulate matter with an aerodynamic diameter of 2.5 microns (PM2.5) emissions would be generated in the South Coast Corridor than what would otherwise result in the future if the Proposed Project was not implemented. L17-11

South Coast AQMD has a particular interest in achieving reductions of these pollutants as we have the worst ozone pollution in the country and some of the highest levels of PM2.5.[2] The United States Environmental Protection Agency (U.S. EPA) classifies the region as in "extreme" nonattainment for all ozone standards and in "serious" non-attainment for the annual PM2.5 standard (both are the worst pollution categories available for their respective pollutants).[3] The region has reduced pollution dramatically over the past several decades, but it still has a long way to go. For example, one-hour ozone levels and 24-hour PM2.5 levels have been slashed 50 percent between 1995 and 2015, with ozone levels increasing and then plateauing since about 2015.[4] Meanwhile, annual PM2.5 levels dropped nearly 50 percent, while the levels of ozone exceeding the eight-hour standards dropped about 25 percent.[5] The 2015 eight-hour standard is so stringent that the region still needs to reduce the key precursor, nitrogen oxides (NOx), by 83 percent beyond 2018 levels by the 2037 attainment year.[6] Nonetheless, even if all sources subject to South Coast AQMD and California Air Resources Board (CARB) regulations were completely eliminated, the emissions from three large sources which are primarily regulated at the federal level (ships, locomotives, and aircraft) would continue to cause a substantial exceedance of the emissions levels needed to attain the 2015 ozone standard in our region.[7] For that reason, the South Coast AQMD is required to seek all available NOx emission reductions to achieve ozone and PM2.5 National Ambient Air Quality Standards for the region within South Coast AQMD jurisdiction. L17-12

NOx emissions from goods movement activities make up about one half of all smog-forming emissions in our region and NOx is the key precursor pollutant for the formation of ozone and PM2.5. In addition to impacts under the federal Clean Air Act from not attaining air quality standards for these pollutants, both ozone and PM2.5 significantly impact public health, even causing premature death. Ozone can cause coughing, difficulty breathing, pain when breathing, damage to airways, susceptibility to infection, aggravation of lung diseases such as asthma, emphysema, and chronic bronchitis, and death from respiratory disease.[8] Particulate matter, including PM2.5, can cause premature death in people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, aggravated asthma, decreased lung function, and increased respiratory symptoms, such as irritation of the airways, coughing, or difficulty breathing.[9] Diesel particulate L17-13

[2] South Coast AQMD. Final 2022 Air Quality Management Plan (AQMP), p. 2-16. Accessible at: https://www.aqmd.gov/home/air-quality/air-quality-management-plans/air-quality-mgt-plan
[3] *Ibid.* p. 2-12
[4] *Ibid.* p. 2-20. Figure 2-2.
[5] *Ibid.* p. 1-16. Figure 1-6
[6] *Ibid.* p. ES-4
[7] *Ibid.* p. ES-7
[8] U.S. EPA. Health Effects of Ozone Pollution. Accessible at: https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution
[9] U.S. EPA. Health and Environmental Effects of Particulate Matter (PM). Accessible at: https://www.epa.gov/pm-pollution/health-and-environmental-effects-particulate-matter-pm

matter, in particular, has been identified by CARB in 1998 as a toxic air contaminant based on its lung cancer-causing effects. In 2012, the International Agency for Research on Cancer, a part of the World Health Organization, also identified diesel exhaust as carcinogenic.[10] L17-13 cont'd

The DEIR claims that air quality benefits will occur in the Basin (referred to in the DEIR as "SCAB") due to locomotive activity replacing truck trips. Specifically, the analysis in the DEIR assumes that a dedicated fleet of Tier 4 locomotives will be used for the trips to and from the ports; however, there does not appear to be any requirement to ensure this will occur. While these Tier 4 locomotives are mentioned in the BIG Specific Plan and in the DEIR, they are not included in any checklists in the BIG Specific Plan, nor are they included as a mitigation measure. This conclusion is based on the assumption that containers that would otherwise be transported by truck would instead be transported by train to BIG and thereafter by train to the rest of the United States.[11] The DEIR further assumes that the vast majority of containers will arrive at and depart from BIG by train.[12] As such, the DEIR does not explain how or whether the Lead Agency, or any other agency, would require the use of Tier 4 locomotives or enforce this requirement. While we recognize the potential system-level role that rail facilities play in goods movement, absent a legal requirement to enforce the use of Tier 4 locomotives, the DEIR's conclusion that the Proposed Project would result in a net air quality benefit or emission reductions from replacing truck trips with train trips within the South Coast AQMD jurisdiction is speculative and not adequately supported by substantial evidence. L17-14

It does not appear that BNSF has control over the trucks that currently take goods from the ports to distant railyards or all the way to their final destination. Similarly, the DEIR asserts that truck miles traveled would be reduced because BIG would provide an intermodal facility "closer to the unit's origins," yet it does not explain why beneficial cargo owners would shift freight away from existing closer intermodal facilities such as Hobart or San Bernardino, nor does it quantify how such diversion would be achieved through enforceable commitments or pricing mechanisms.[13] L17-15

Thus, BNSF is apparently depending on market forces to attract traffic to its rail lines in sufficient volume to cause emission reductions in the South Coast corridor. Such reliance is speculative and insufficient to avoid the conclusion that the Proposed Project's additional rail traffic will cause significant emissions in the Basin.[14] CEQA Guidelines Section 15384 ("Argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment, does not constitute substantial evidence.") See also CEQA Guidelines Section 15145 ("Speculation is not a substitute for analysis.") As a result, the DEIR must analyze the impacts of BIG without that assumption. L17-16

Such analysis would show that the environmental impacts of the BIG project within the Basin would be significant and adverse. According to Table 5.3-25, BIG would result in increases in operational rail emissions in the South Coast corridor of 110 pounds per day (lbs/day) of NOx in L17-17

[10] California Air Resource Board (CARB). Overview: Diesel Exhaust & Health. Accessible at: https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health
[11] DEIR, Ch 1.3.2 and p. 5.3-94
[12] *Ibid.* p. 1-4
[13] DEIR Table 5.8, and Appendix 5-15 Transportation, p. 5.15-75
[14] DEIR p. 3-55

2028, 158 lbs/day in 2033, and 236 lbs/day in 2048 compared to rail emissions in the corridor without BIG. All of these values exceed the South Coast AQMD air quality operational significance threshold for NOx of 55 lbs/day. The DEIR claims a net NOx emission reduction in the Basin only because it assumes decreases in truck miles traveled (TMT) emissions in each of these years. The assumed reductions in truck emissions are 394 lbs/day in 2028, 441 lbs/day in 2033, and 425 lbs/day in 2048.[15]

L17-17 cont'd

It is especially important to analyze air quality impacts without the assumption that BIG will replace truck trips because it is also possible that train travel to BIG would instead accommodate future Port growth. If this is the case, BIG would add train trips through the Basin with no (or a fewer) reduction on truck trips.[16] Accordingly, if the DEIR did not assume NOx emission reductions from replaced truck trips, the Proposed Project's NOx emission impacts would be significant. Changes in overall Port activity have been documented over the past two decades. For example, total national market share of containerized trade at the ports of Los Angeles and Long Beach peaked at about 30 percent in the late 2000s and has steadily declined since then.[17] Most of this loss in national market share has been due to goods destined for other states now being shipped through other port complexes on the east coast.[18] As BIG is projected to be "a transformative project with widespread benefit at the federal, state, and local level",[19] it is possible that some of this recently lost market share could return to the Ports of Los Angeles and Long Beach. The additional capacity brought by BIG for block swapping and intermodal activity could therefore potentially not replace existing long-haul trucking from our region, but rather accommodate goods currently being shipped via water to other ports around the nation. The result of this kind of activity may not readily be distinguishable at the BIG facility itself, as the locomotive and onsite trucking activity could be consistent with EIR projections. Moreover, emissions may not be reduced as projected in the Basin if long-haul trucking from the region remains.

L17-18

Because of the existing significant adverse health effects from air pollution within South Coast AQMD jurisdiction and to avoid a potentially significant increase in operational NOx emissions within Basin, the Lead Agency is required to adopt enforceable mitigation measures. Consequently, it is vital that the DEIR specify any and all measures necessary to achieve the estimated reductions assumed from the reliance on Tier 4 locomotives be enforceable. We believe there are multiple ways to establish an enforceable mechanism using what appears to be an existing commitment on Tier 4 locomotives, and we would like to discuss potential approaches with the Lead Agency and project proponent. Several feasible mitigation measures are discussed in Section V. of this letter.

L17-19

[15] *Ibid.* Table 5.3-25 and p. 5.3-94
[16] Moreover, these assumed reductions represent a relatively small percentage of total rail emissions in the Basin. For example, in 2048 the assumed truck emission reductions of 425 lb/day represent approximately 3.4 percent of the projected 12,451 lb/day of rail emissions under the "with BIG" scenario.
[17] California Center for Jobs and the Economy, May 2024. *Economic Importance of Trade & the Ports to Southern California.* https://static1.squarespace.com/static/65c511cb0e45ff412eec4118/t/66565d111e175f7ecc2aa28f/1716935965095/Economic-Impact-Ports-Report-FINAL.pdf (Figure 7)
[18] Ports of Long Beach and Los Angeles, February 2020. *Economic Study for the Clean Truck Fund Rate*. https://cleanairactionplan.org/download/222/other-documents/5033/final-economic-study-for-clean-truck-fund-rate.pdf
[19] DEIR. p. 4-7

II. *The DEIR Improperly Includes the Use of Tier 4 or Cleaner Line-Haul Locomotives within the Basin as a Project Component Rather than a Mitigation Measure.*

A critical assumption leading the DEIR to conclude that the Proposed Project would be beneficial for air quality in the Basin is the assumption that BNSF would use a dedicated fleet of Tier 4 or cleaner line-haul locomotives to transport goods between the ports and BIG. Tier 4 locomotive NOx emissions are at least 76 percent cleaner than non-tier 4 locomotives. As such, South Coast AQMD supports the use of Tier 4 or cleaner line-haul locomotives through the Basin, as it would significantly reduce NOx emissions caused by the Proposed Project. However, the South Coast AQMD is concerned that nothing in the DEIR or project documents *requires* BNSF to utilize such a dedicated fleet. L17-20

Absent an enforceable mechanism, rather than assuming that BNSF will utilize a cleaner, dedicated fleet of line-haul locomotives, the DEIR must analyze the impacts of the Proposed Project without this assumption and then adopt enforceable, effective mitigation for any impacts. *Lotus v. Department of Transportation* (2014) 223 Cal.App.4th 645, 656-57 (EIR may not "compress[] the analysis of impacts and mitigation measures into a single issue"; doing so improperly omits development of enforceable mitigation measures and monitoring program).[20] Doing so would disclose the true, unmitigated impacts of the Proposed Project and also require the development of enforceable mitigation, as CEQA requires. Here, BNSF's current fleet-average locomotive emissions level in the Basin is approximately Tier 2 equivalent, based on the 1998 Memorandum of Understanding (MOU) between the Class I railroads and CARB. The MOU expires in 2030, after which the fleet-average locomotive emissions can equal any tier level, including Tier 0 and Tier 1. The DEIR must assess the potential impacts from using such a fleet and then identify mitigation, including the use of Tier 4 or cleaner locomotives, to reduce the Proposed Project's air quality impacts, or otherwise demonstrate how the use of Tier 4 or cleaner locomotives will be ensured.[21] L17-21

The City must also include a mitigation monitoring and reporting program that would ensure any mitigation or other requirements are implemented and effective throughout the Project's lifetime. CEQA supports monitoring to ensure that environmental commitments remain effective over time (CEQA Guidelines Sections 15097 and 15126.4(a)(1)(B)). We note that a dedicated fleet of Tier 4 locomotives would not affect all trains going to or coming from the project site. There are about five trains per day in 2048 that are assumed to be Tier 4 locomotives and dedicated to travel in South Coast AQMD, but about 66 other trains per day in 2048 will be moved using BNSF's average national fleet (with >75 percent assumed to be less than Tier 4 in the DEIR). It is not clear how the Lead Agency or project proponent will determine which locomotives are Tier 4 from this fleet mix, and whether they are consistent with the assumptions in the DEIR. Hence, the Final EIR should describe how this Tier 4 fleet will be monitored and how that information can be made available to the public. L17-22

[20] Similarly, the replacement of switchers at the Barstow containment yard is improperly characterized as a project feature when it should be made an enforceable mitigation measure.
[21] In the past, railroads have stated that assigning specific locomotive types to specific geographic areas is infeasible. However, the DEIR provides substantial evidence that it is feasible to use a dedicated fleet of locomotives between the ports and BIG. Therefore, there should be no impediment to converting BNSF's "commitment" to use a cleaner fleet of locomotives into an enforceable mitigation measure.

While multiple approaches could be used to ensure enforceability and accountability, the DEIR itself suggests one potential mechanism. The DEIR (see p. 3-55) states that BNSF would contract with warehouses to include volume commitments for long-haul travel from BIG to destinations throughout the United States on BNSF's network. Although it is unclear whether such volume commitments alone would ensure reductions in truck traffic, similar contractual commitments could be extended to freight movement between warehouses (or the Ports) and BIG, in both directions. BNSF could potentially enter contracts with the entities shipping their cargo to require cargo to travel by train to BIG rather than by truck to another destination. Such commitments, combined with monitoring and reporting requirements, could ensure that goods are transported on BNSF-operated trains built with Tier 4 locomotives rather than by truck. Any such requirements would need to be included as enforceable conditions of project approval and/or mitigation measures to allow for enforcement by the City of Barstow and, where applicable, South Coast AQMD. Further potential mitigation measures are also discussed in Section V. of this letter. L17-23

III. Emissions Inventory Discussion is Unclear and Impermissibly Segments Emission Increases

The DEIR presents emissions inventories for the General Plan Update and the Barstow International Gateway (BIG) Project that are internally inconsistent and analytically fragmented, resulting in an unclear and misleading characterization of the Proposed Project's air quality impacts. L17-24

Tables 5.3-17 and 5.3-18 of DEIR[22] present estimates of unmitigated criteria pollutant emissions for the General Plan Amendment and the BIG Project. However, these tables explicitly exclude mobile source emissions. While there is a separate line item for on-road transportation, and one for certain off-road emissions, there does not appear to be a category for locomotive emissions. The DEIR does not clearly explain the rationale for excluding these emission sources from the inventory presented in these tables, nor does it reconcile these exclusions with other portions of the air quality analysis that rely heavily on mobile-source emissions to support significance determinations. L17-25

CEQA does not permit a lead agency to segment a project's emissions analysis by selectively separating stationary-source emissions from related mobile-source emissions when those emissions are part of the same project and contribute to the same environmental impact. In *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, the court held that it is "inaccurate and misleading to divide the project's air emissions analysis into on-site and secondary emissions for purposes of invoking the presumption that the project will have no significant impact" (Ibid. at pp. 716-717). By excluding locomotive emissions from certain inventories while relying on them elsewhere to claim overall air quality benefits, the DEIR impermissibly segments the Proposed Project's emissions and obscures the full extent of its impacts. L17-26

South Coast AQMD agrees that it is appropriate under CEQA to evaluate emissions separately by air basin, because regional mass emission significance thresholds are basin-specific and are intended to be applied to emissions occurring within each respective air basin. However, even within a basin-specific analysis, the DEIR must present a complete and internally consistent accounting of emissions by source category. The selective inclusion and exclusion of mobile L17-27

[22] *Ibid.* p. 5.3-75 and p. 5.3-76, respectively

sources emissions across tables and chapters undermines the credibility of the emissions analysis and precludes meaningful public review. L17-27 cont'd

As discussed in Section I. of this letter, the emissions inventory relies heavily on the assumption that the Proposed Project will reduce truck miles traveled by displacing truck trips with rail trips. The DEIR asserts that BIG would reduce heavy duty truck TMT because it would provide an intermodal facility closer to the unit origins than currently exists.[23] Although the DEIR does not clearly specify whether this statement refers to the origin of cargo at the ports or to origins elsewhere in the United States, it appears to refer to port-related cargo. L17-28

The DEIR does not explain why beneficial cargo owners would choose to route containers by trains to BIG rather than by trucks to existing in-basin intermodal facilities such as Hobart or San Bernardino, both of which appear to be closer to the Ports of Los Angeles and Long Beach than BIG. To divert containers away from these existing facilities, BNSF would need to provide an economic or operational incentive sufficient to overcome the additional distance and time associated with routing cargo to Barstow. The DEIR does not identify what those incentives would be, whether they are feasible, or whether they would be enforceable. Nor does the DEIR cite evidence in the appendices demonstrating that such mode-shift assumptions are grounded in actual market behavior rather than aspirational business objectives. L17-29

The greenhouse gas (GHG) analysis in Chapter 5.8 of the DEIR further illustrates the internal inconsistencies in the emissions inventory. In particular, Table 5.8-12 of DEIR[24] indicates that the total GHG emissions associated with the BIG Project would be negative on a net basis due to assumed nationwide reductions in TMT. However, these net negative values are relatively small compared to the total GHG emissions generated by BIG absent those assumed reductions. As a result, even modest errors or overestimates in the projected nationwide TMT reductions could readily convert the Proposed Project's GHG impacts from net benefits to significantly adverse. For example, Table 5.8-12 (see pp. 5.8-61 and 5.8-62) indicates that the total unmitigated metric tons of carbon dioxide equivalent (MTCO2e) emissions from the Proposed Project will be 27,130 MTCO2e per year. Included in that number are the reductions from TMT reductions nationwide of 372,415 MTCO2e per year. GHG emission reductions from mitigation measures are 50,041 MTCO2e per year plus 3,244 MTCO2e per year for a total of 53,285 MTCO2e per year. As such, the total remaining GHG emissions are 27,130 MTCO2e per year minus 53,285 MTCO2e per year or -26,155 MTCO2e per year (a reduction). However, if the estimates for TMT reductions are too high by 10 percent (for example by only partially diverting some long-haul truck trips and instead accommodating some growth at the ports), the net amount of GHG emissions before mitigation would be 27,130 MTCO2e per year plus 37,241 MTCO2e per year for a total of 54,371 MTCO2e per year, which is greater than the reductions from mitigation measures of 53,285 MTCO2e per year. Since this table uses a threshold of zero, the Proposed Project would result in a significant net increase of GHG emissions. L17-30

Despite Table 5.8-12 indicating a net reduction in GHG emissions, the DEIR concludes that GHG impacts would be "potentially significant."[25] The DEIR then states that "no mitigation is required," which is inconsistent with a finding of potentially significant impacts. Even more confusingly, the L17-31

[23] *Ibid.*, Table 5.8-14, p. 5.8-82; and DEIR, p. 5.15-75
[24] *Ibid.* p. 5.8-61
[25] *Ibid.* p. 5.8-63

same section concludes that GHG impacts would be "less than significant after mitigation," implying that mitigation measures are in fact being applied. The DEIR does not clearly identify what mitigation measures, if any, are being imposed, nor does it quantify the emission reductions attributable to those measures. L17-31 cont'd

To comply with CEQA, the DEIR must clearly identify the baseline used, consistently apply emissions inventories across source categories, and transparently disclose whether claimed emission reductions are attributable to enforceable mitigation measures or to speculative assumptions regarding future market behavior and nationwide trucking trends. L17-32

IV. The DEIR Does Not Provide Justification For The Exclusive Use Of A Future Baseline

The DEIR only uses a future baseline for the criteria pollutant emissions in the Basin. As shown on Table 5.3-25 (see p. 5.3-94), "Unmitigated Operational Emissions in SCAB (lb/day)", the baseline for each analyzed year is emissions without BIG. However, the normal CEQA baseline is the existing conditions at the time of the Notice of Preparation (NOP). A DEIR may rely solely on a future baseline only if it would be uninformative or misleading to also use an existing conditions baseline. However, that is not the case for the Proposed Project. On the contrary, if the DEIR had also used an existing conditions baseline, it would have revealed that the emission reductions from reduced truck miles traveled are not sufficient to offset the rail emissions within the Basin associated with BIG. Instead, the only reason BIG does not cause a significant increase in emissions within Basin is because the assumed emissions under the future conditions without BIG are so large. L17-33

This conclusion holds true even when applying the DEIR's assumptions about future emissions and reductions. According to Table 5.3-25, the NOx emissions in the Basin in 2028 without BIG will be 11,008 lbs/day. Since the DEIR does not use existing conditions as a baseline, we do not have exact figures for such a baseline. However, emissions in the no-project condition in 2028 are the closest estimate to existing conditions and will be used for illustrative purposes. If anything, existing conditions should result in fewer impacts since the DEIR projects annual growth throughout the period of study. This amount can be used as a proxy for existing conditions. NOx emissions in 2028 with BIG are 11,118 lbs/day, an increase of 110 lbs/day (these appear to be an increase because of the use of 2028 emissions without BIG as a proxy). Also, NOx emissions with BIG in 2033 are 11,460 lbs/day, an increase of 452 lbs/day over baseline while emissions in 2048 with BIG are 12,451 lbs/day, an increase of 1,443 lbs/day. The assumed emission decreases due to the replacement of truck miles traveled with trains does not offset the emissions increase with BIG. In 2033, the reduced TMT amounts to 441 lbs/day of NOx, while the increase is 452 lbs/day of NOx, which is relatively small. However, by 2048, the increased NOx emissions with BIG is 1,443 lbs/day, whereas the NOx emission reductions from replacing trucks with trains is merely 425 lbs/day. The new NOx emissions with BIG exceed the reduced NOx emissions by 1,018 lbs/day which for context, is equivalent to 18 major stationary sources with each emitting 55 lbs/day of NOx or 10 tons/year. Thus, the reduced NOx emissions due to reduced TMT would only offset the increases with BIG if the increases without BIG are used as the baseline and only if the emissions increase as projected in Table 5.3-25 occurs. Therefore, it is important that the NOx emission reductions are attributed to the use of trains built with Tier 4 locomotives with enforceable mitigation measures and conditions of project approval instead of relying on taking L17-34

credit for NOx emission reductions from the assumption of reduced trucks. The use of a future baseline is allowed under CEQA if normal existing conditions baseline would be uninformative or misleading; however, the DEIR does not provide sufficient justification for why the existing conditions baseline was not used. L17-34 cont'd

Also, in the GHG analysis, the DEIR is unclear about what exactly is used as the baseline. The normal CEQA baseline is existing conditions on the ground. The DEIR claims that it is using the norm, i.e. existing 2023 General Plan Area Emissions, as the CEQA baseline.[26] However, the actual calculations appear to use future baselines. Rather than using 2023 emissions (claimed baseline) as the point of comparison with emissions including BIG, Table 5.8-12 uses three different future-year emissions: 2028, 2033, and 2048. While a future baseline may provide useful information, a lead agency may rely solely on a future baseline only if it shows that an analysis based on existing conditions would be uninformative or misleading. *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority*, 57 Cal. 4th 439, 451-52 (2013). The DEIR does not explain why an existing conditions baseline would be uninformative or misleading. Indeed, it is possible that an existing conditions baseline would reveal that the emissions are greater than illustrated in Table 5.8-12. L17-35

Similarly, p. 6.3 of the DEIR says that the cumulative baseline is the future year 2048 "no project" alternative, rather than existing conditions. The rationale for this choice needs to be explained in the Final EIR. L17-36

V. The DEIR Does Not Incorporate Feasible Mitigation Measures

As explained in Section I. of this letter, the DEIR does not include enforceable mechanisms to ensure that the new rail trips through the Basin from the BIG project are actually replacing truck miles traveled, or that they are necessarily using Tier 4 locomotives. Accordingly, there is insufficient basis to conclude that there will be no significant adverse criteria pollutant impacts within the Basin. If the new train trips do not replace existing truck miles traveled, then the regional mass criteria pollutant emissions would exceed the South Coast AQMD air quality operational significance threshold for NOx of 55 lbs/day for all milestone years: 110 lbs/day in 2028;158 lbs/day in 2033; and 236 lbs/day in 2048. Therefore, CEQA requires the adoption of feasible mitigation measures to reduce these impacts within the Basin. L17-37

One potential mitigation measure would be to require BNSF to periodically re-assess the state of technology to determine whether zero-emission (ZE) locomotives can be demonstrated in the closed-loop route between the Ports and BIG. While the DEIR concludes that ZE locomotives are not yet available, the implementation timeline of the Proposed Project extends to at least 2048, which is the horizon year for the DEIR. Indeed, there is no reason to assume the railyard will cease operating and will cease having environmental impacts in 2048. Rather, the analysis of the Proposed Project ends in 2048, presumably with full build out and the highest anticipated operations and associated impacts. Since the BIG project has a very long life, it is feasible to require certain technology development and technology implementation measures that might otherwise be infeasible for a shorter-term project. L17-38

[26] *Ibid.* Table 5.8-9, p. 5.8-51,

As defined in CEQA Guidelines Section 15364, "feasible" means "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors."[27] With a project of at least 25 years such as this one, a "reasonable period of time" should not be limited to the date of project approval. Instead, a reasonable period of time includes what is reasonable in view of the long-term operation of the project. Thus, a requirement to periodically monitor technological advances and subsequently use ZE locomotives when they become available, is a logical and practical requirement that could be carried out in a reasonable period of time. L17-39

The DEIR claims that battery electric locomotives will not be able to scale up in time for use in line haul trains.[28] While they may not be practical for use in 2026, the DEIR needs to evaluate what may be feasible over the lifetime of the Proposed Project. CARB's comment letter on the NOP regarding the Proposed Project indicated that ZE switcher locomotives may be commercially available by approximately 2030 and that ZE or hybrid line-haul configurations may become feasible by approximately 2035. Even if these estimates prove optimistic, the Lead Agency should require BNSF to monitor technological development, provide updates to the Lead Agency, and implement feasible ZE technologies using a phased approach. For example, BNSF could commit to incremental fleet conversion (e.g., by replacing a minimum percentage of locomotives annually as ZE technology becomes viable), including hybrid configurations such as those demonstrated in BNSF's ZANZEFF project.[29] Such phased deployment could meaningfully reduce emissions well before full electrification becomes commercially feasible. L17-40

Moreover, such mitigation would reduce emissions of both criteria pollutants and GHGs within both the BIG footprint and the rail corridor within South Coast AQMD jurisdiction. Even if the Lead Agency ultimately concludes that mitigation is not required within the Basin, these measures would mitigate significant air quality impacts in the Mojave Desert Air Basin (MDAB), where unmitigated emissions exceed significance thresholds in multiple milestone years.[30] L17-41

In addition to these suggestions, as a further mitigation, the Lead Agency could require BNSF to use ZE battery tender cars to let its Tier 4 locomotives operate in ZE mode to the fullest extent feasible. The DEIR considers this option, but rejects it, for reasons based on reduced payload and economy of the operation.[31] However, economic impacts alone are not sufficient to demonstrate infeasibility. According to the definition of "feasible" in CEQA Guidelines Section 15364, a mitigation measure is feasible economically if it is capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic factors. Therefore, to be economically infeasible, the economic factors must be such as to render the measure incapable of successfully being carried out. In the context of alternatives, the courts have said that the fact that an alternative may be more expensive or less profitable is not enough to show that the alternative is financially infeasible. *Uphold Our Heritage v. Town of Woodside*, 147 Cal. App. 4th 587, 598 (2007). This principle should apply to mitigation measures also for if a mitigation measure were L17-42

[27] CEQA Guidelines Section 15364
[28] DEIR, p. 5.3-110
[29] BNSF Zero- and Near Zero-Emission Freight Facilities Project (ZANZEFF) Data Acquisition. May 2021. Accessible at: https://ww2.arb.ca.gov/sites/default/files/2022-11/zanzeff-bnsf-belreport.pdf
[30] DEIR. Table 5.3-24, p. 5.3-91 through p. 5.3-93
[31] *DEIR.* p. 5.3-110.

necessarily infeasible because it is more expensive, scarcely any mitigation measures would ever be adopted. So, the economic factors must be considered in the context of the project. Ibid. p. 599. In fact, the *Woodside* court held that economic factors must be sufficiently severe as to render it impracticable to proceed with the project. Ibid. p. 598. While later courts have held that this test does not apply to mitigation measures, see *San Diego Navy Broadway Complex Coalition v. California Coastal Commission*, 40 Cal. App. 5th 563, 609 (2019), there still must be substantial evidence that the economic burdens make the measure infeasible, not merely that there would be some (unspecified) increased costs. BNSF reports net operating income of about $1.5 billion in the second quarter of 2025. While not in itself conclusive, this factor shows that BNSF must present evidence of why suggested mitigation measures are economically infeasible.

L17-42 cont'd

The DEIR seems to assume that a mitigation measure is not feasible if it is not available immediately, but this is the wrong legal standard. As explained earlier, the CEQA Guidelines provide that a mitigation measure is feasible if it is capable of being carried out in a reasonable period of time, not immediately. What is a reasonable period of time should be evaluated in the context of the project at issue. *Woodside*, p. 599. Several potential mitigation opportunities are rejected because it would take 7-10 years to get additional power to the site from Southern California Edison (SCE).[32] For example, the DEIR rejects battery-electric line haul locomotives,[33] battery-electric switchers, ZE and near-zero (NZE) trucks,[34] and electric Rubber Tired Gantry Cranes (RTGs),[35] wholly or partly because it would take 7-10 years to get enough power to the site. However, that period of time is reasonable since the Proposed Project has no real end date. In particular, longer planning periods are common for air quality analyses given the long lead times needed to attain ambient air quality standards. For example, South Coast AQMD has a 2037 attainment date for the 2015 ozone standard, with potential attainment dates beyond 2037 for the 2024 PM2.5 standard, or future tighter standards.

L17-43

When describing the potential for ZE/NZE trucks, the DEIR also asserts that BIG has insufficient space for the charging infrastructure even though BNSF is already greatly expanding its area in Barstow. There is no analysis of whether or not, especially at this early stage, the Proposed Project could be modified to include necessary space to prepare for electric infrastructure and the use of more electric equipment in the future. The DEIR also does not demonstrate that the available land is too constricted to allow for planning in the future. The current design of its Proposed Project should not be used as an excuse for not planning for or using future emission-reducing technologies. At the very least, the DEIR should include an alternative in which the project footprint is expanded somewhat to include the space needed to accommodate the additional electric infrastructure and use of more electric (or hydrogen) equipment in the future.

L17-44

In order to reduce localized emissions, BNSF commits to using Tier 4 switchers instead of diesel equipment. However, the DEIR rejects battery-electric switchers not only because of the need for additional power, but also because their use would require charging time and reduce "fluidity" of yard operations, plus they could be more expensive than diesel switchers.[36] Again, this is not a sufficient justification to determine infeasibility. Economic factors do not cause infeasibility unless

L17-45

[32] *Ibid.* p. 5.3-113
[33] *Ibid.* p. 5.3-111
[34] *Ibid.* p. 5.3-113-114
[35] *Ibid.* p. 5.3-115
[36] *Ibid.* p. 5.3-112

they mean that the mitigation measure is not capable of being successfully implemented. No showing of true infeasibility is made. As one example, grant funding for ZE locomotives has been made available several times in recent years. One mitigation measure could require BNSF to apply in good faith for funding for ZE locomotives, and to carry out the funded projects if awarded. L17-45 cont'd

While the DEIR proposes a mitigation measure that would require BNSF to install electric infrastructure, it only gets implemented once a particular building is being served by electric trucks.[37] The Lead Agency is recommended to revise this mitigation measure to require the project proponent to provide electric infrastructure as needed to phase-in electric equipment, including locomotives, as described earlier. At the beginning of the Proposed Project, the Lead Agency is recommended to require BNSF to include space sufficient to accommodate the necessary infrastructure for its switchers and its entire "captive" fleet for shuttling goods from the Ports and returning to the Ports. The Lead Agency is also recommended to require BNSF to change out its switchers for electric ones once ZE locomotives have been demonstrated feasible for switcher use. Similarly, once ZE locomotives have been demonstrated for in-line-haul use, Lead Agency is recommended to require BNSF to replace at least 10 percent of its fleet each year with ZE locomotive engines. Moreover, the Lead Agency is recommended to require BNSF to complete all of the necessary preparatory work with the utilities, other than installing charging stations by 2030, and instead, installing necessary charging stations concurrently with the requirement to phase in electric locomotives. L17-46

In both the Basin and the MDAB, BIG emissions are significant for at least some criteria pollutant emissions from a cumulative perspective. The DEIR concludes that the rail corridor in South Coast does not experience any significant criteria pollutant impacts by itself, but its impacts are cumulatively considerable. BIG shows a cumulative increase of emissions of carbon monoxide (CO) and volatile organic compounds (VOC) in 2033 and 2048, and a cumulative increase of CO in 2028. Thus, BIG is identified as cumulatively considerable for these pollutants.[38] Accordingly, even if BIG is not required to use battery electric and battery tender car system locomotives based on its emissions within the Basin considered separately, since these emissions are cumulatively considerable, mitigation is still required. Use of battery-electric locomotives or battery tender systems for the trip segments between the Ports and BIG would mitigate all of these pollutants, to a degree depending on the degree of utilization. L17-47

For MDAB, the DEIR concludes that the emissions are significant for all criteria pollutants for at least one year. The analysis further concludes that mass emissions in MDAB are significant and there are no feasible mitigation measures.[39] However, CARB has identified a number of feasible mitigation measures that could be applied to the Proposed Project. For example, CARB asserts that ZE locomotives will be available for switchers by 2030 and for line haul locomotives by 2035.[40] Therefore, the Lead Agency is recommended to require BNSF to periodically review the L17-48

[37] *Ibid.* MM AQ-14, p. 1-51
[38] *Ibid.* p. 6-21
[39] *Ibid.* p. 6-22
[40] CARB Comments on NOP, p. 9. Accessible at: https://ww2.arb.ca.gov/sites/default/files/2024-11/CARB%20Comments%20-%20NOP%20for%20the%20Barstow%20International%20Gateway%20Project%20Specific%20Plan.pdf

state of technology and implement all feasible ZE locomotives as they become available. Moreover, CARB recommends the use of ZE cargo-handling equipment ZE and ZE TRUs.[41] L17-48 cont'd

VI. The DEIR Should Estimate Localized Criteria Pollutant Health Impacts

The DEIR does not estimate adverse human health impacts from the emission of criteria pollutants from BIG. Instead, the DEIR discusses the *Friant Ranch* case and specifically South Coast AQMD's amicus brief in that case, submitted in 2015. According to the DEIR, that brief indicated that at that time (2015) the staff did not know of a way to quantify ozone related to an individual project.[42] However, the actual statement was that South Coast AQMD "staff does not currently know of a way to accurately quantify ozone-related health impacts caused by NOx or VOC emissions from relatively small projects." (Amicus Brief, p. 12) However, there are now tools available to approximate ozone impacts from individual projects, and BIG is not a relatively small project in any event. While the document claims that U.S EPA's BENMAP model would produce very small results-near zero,[43] South Coast AQMD staff supports the use of BENMAP to estimate ozone-related health impacts from projects such as BIG. Alternatively, the DEIR could use an approximation of health effects by scaling the health benefits identified in the latest AQMP from the regional modeling to the tons of emission increases caused by the Proposed Project. L17-49

VII. The DEIR Does Not Analyze Increased Grade-Crossing Delay, Idling, and Emissions Caused by Additional Train Traffic

The DEIR does not analyze the reasonably foreseeable secondary traffic congestion, vehicle delay, idling, and associated air quality impacts that would result from increased train volumes generated by BIG, particularly at at-grade rail crossings in Riverside County and other portions of Basin. Increased train frequency and longer trains increase gate-down time, vehicle queuing, and idling, which in turn increase localized and regional emissions of criteria pollutants and GHGs. These impacts constitute indirect project effects that are required to be analyzed as set forth in CEQA Guidelines Sections 15126.2(a) and 15358(a)(2). L17-50

Congestion and delay occurring at BNSF at-grade crossings are already a documented regional problem. Regional transportation planning documents recognize that rail activity is a major contributor to roadway delay and that substantial grade separation investments are needed but remain unfunded or scheduled well beyond the near-term planning horizon. For example, the Riverside County Transportation Commission (RCTC) reported that total vehicle hours of delay at all railroad crossings combined were projected to increase from approximately 600 hours per day in 2010 to approximately 3,700 hours per day in 2035, and that total emissions at railroad crossings were projected to increase from approximately nine tons per year in 2010 to approximately 53 tons per year in 2035.[44] These data demonstrate that rail-related congestion L17-51

[41] CARB Comments on NOP, p. 12,13
[42] DEIR, p. 5.3-115
[43] *Ibid.* p. 5.3-116
[44] RCTC. Grade Separation Priority Update Study for Alameda Corridor East (Riverside County) Final Report, p. 21. Accessible at: https://www.rctc.org/wp-content/uploads/2018/03/rctc-gradecrossingpriorityreport-final-withappendix-040612.original.pdf

already produces substantial emissions and that incremental train traffic materially contributes to worsening air quality conditions. L17-51 cont'd

Similarly, Southern California Association of Governments (SCAG) regional freight and rail planning documents acknowledge these ongoing congestion challenges and the need for long-term infrastructure improvements that will not be completed before BIG becomes operational.[45] The BIG project will generate additional train movements through these same corridors well in advance of completion of the planned grade separations which will worsen the existing setting. L17-52

Despite this known context which represents baseline conditions, the DEIR does not quantify:

(a) the incremental number of train movements attributable to BIG at affected crossings;
(b) the resulting increases in gate-down time, vehicle delay, and idling;
(c) the associated criteria pollutant and greenhouse gas emissions; or
(d) the potential localized exposure impacts on nearby sensitive receptors. L17-53

The DEIR also does not evaluate whether the added rail traffic from BIG undermines congestion and emissions assumptions embedded in the aforementioned regional transportation plans and modeling. L17-54

This omission results in an incomplete and misleading analysis of transportation-related air quality impacts. As such, the Lead Agency is recommended to revise the DEIR to quantify the project-related increases in crossing delay and idling, evaluate resulting emissions and localized exposure impacts, assess consistency with regional transportation planning assumptions, and identify feasible mitigation measures, such as participation in grade separation funding, operational controls, and peak-period scheduling constraints. Absent this analysis and mitigation, the DEIR understates the indirect air quality impacts of the BIG project which is inconsistent with CEQA's disclosure and mitigation requirements. L17-55

VIII. Additional CEQA Concerns

A. Failure to Analyze Reasonably Foreseeable Worst-Case Operating Scenarios

The DEIR relies on a single, highly optimized operational scenario (maximum rail use, Tier 4 locomotives, high displacement efficiency) without evaluating alternative scenarios where those assumptions fail. However, CEQA requires an analysis of reasonably foreseeable indirect effects. In this case, since there is no assurance that the increased train trips will be partially offset by decreased truck trips, it is important that the analysis includes other realistic scenarios. Therefore, the Lead Agency is recommended to conduct sensitivity analyses and include these analyses in the Final DEIR for: partial truck displacement (25 percent, 50 percent, 75 percent), mixed locomotive fleets (Tier 2 - Tier 4), and growth-driven throughput without truck displacement. L17-56

[45] SCAG. On The Move Southern California Delivers. The Good, Comprehensive Regional Goods Movement Plan and Implementation Strategy, p. 21. Accessible at: https://scag.ca.gov/sites/default/files/2024-05/crgm_onthemove_execsummary.pdf

B. DEIR Should Use U.S. EPA-Approved EMFAC2021 Off-Model Adjustment Factors For The Analyses of Mobile Source Emissions

The DEIR's mobile-source emissions analyses for both the baseline and project scenarios appear to rely on the existing EMFAC2021 model parameters without accounting for recent federal changes to California mobile source regulations and associated emissions modeling assumptions. In November 2025, the U.S. EPA approved EMFAC2021 off-model adjustment factors that remove the estimated emissions benefits attributed to several California regulations, including the Advanced Clean Trucks (ACT), Zero-Emission Airport Shuttle, Heavy-Duty Vehicle Warranty and Maintenance Provisions, and Heavy-Duty Omnibus regulations. [4647] The application of unadjusted EMFAC2021 emission factors in the DEIR means that the future mobile source emissions of criteria pollutants and GHGs were underestimated. Given the long operational horizon of the Proposed Project through at least 2048, the Lead Agency is recommended to update the mobile emission estimations in the Final EIR to reflect the application of the U.S. EPA-approved adjustment factors and disclose how this affects baseline and project emissions. L17-57

C. Inconsistencies Between Transportation and Air Quality Appendices

The following internal discrepancies exist between the Transportation Appendix 5.15 and the Air Quality Technical Report in Appendix 5.3 regarding truck displacement, activities, and trip allocation: L17-58

Truck Displacement Assumptions: Transportation Appendix 5.15 shows specific reductions in truck trips attributable to mode shift to rail, but it does not clearly trace how those trip reduction figures are translated into vehicle miles traveled and fleet assumptions used in the Air Quality Technical Report (Appendix 5.3) mobile emissions modeling. Without an explicit correlation, it is not possible for reviewers to verify whether both appendices rely on the same foundational data. L17-59

Trip Allocation and Routing: The Transportation Appendix includes detailed routing and distribution of truck activity across specific highways and regions, but the Air Quality Technical Report in Appendix 5.3 uses composite haul distances and different routing logic that are not documented as to how they were derived from the transportation analysis. These differences result in inconsistent and inaccurate emission estimates since the emissions are scaled based on distance and route characteristics. L17-60

Forecast Years and Activity Levels: In some cases, the same forecast year (e.g., 2033 or 2048) corresponds to different truck activity levels or assumptions between the two appendices, but the DEIR does not reconcile these differences or explain why different values were used for transportation versus air quality modeling. L17-61

[46] U.S. EPA Off-Model Adjustment Factors Approval Letter. Accessible at: https://ww2.arb.ca.gov/sites/default/files/2025-12/EPA%20Off-Model%20Adjustment%20Factors%20Approval%20Letter..pdf
[47] EMFAC2021 Off-Model Adjustment Factors. Accessible at: https://ww2.arb.ca.gov/our-work/programs/msei/emfac2021-model-and-documentation

CEQA requires the Lead Agency to make the best efforts to provide sufficient analysis, disclose an analytically coherent environmental assessment, and internally consistent DEIR. [48] Therefore, the Final EIR should be revised to reconcile these differences, provide documentation of the data sources, and cross-check the calculations to achieve consistency throughout the analyses. L17-62

D. Inconsistency with State and Regional Climate, Freight, and Goods Movement Policies

The DEIR does not adequately demonstrate consistency with applicable statewide and regional policies governing GHG reductions, freight electrification, and goods movement, as required by CEQA.[49] The analysis does not evaluate whether the Proposed Project's long-term emissions trajectory is consistent with California's carbon neutrality goals by 2045 (e.g., EO B-55-18), nor does it meaningfully assess alignment with the California Sustainable Freight Action Plan, which establishes targets such as deploying over 100,000 zero-emission freight vehicles and equipment by 2030. In addition, the DEIR appears to take credit for GHG reductions otherwise attributable to Cap-and-Trade and other statewide regulatory programs (DEIR, p. 5.8-91), without demonstrating that such reductions are project-specific, enforceable, or supported by substantial evidence. L17-63

Further, the DEIR did not analyze consistency with regional freight and transportation planning frameworks, including SCAG's Connect SoCal goods movement strategy and the California State Rail Plan, which address freight growth, congestion management, rail infrastructure needs, and modal shift assumptions. Without reconciling the Proposed Project's forecasts, rail traffic increases, and infrastructure constraints with these adopted plans, the DEIR does not provide a reasoned basis for concluding that the Proposed Project supports long-term regional and statewide transportation and climate objectives. The Final EIR should clearly identify applicable plans, disclose any inconsistencies, and evaluate whether feasible project modifications or mitigation measures are necessary to improve policy consistency. L17-64

E. Inadequate Analysis of Emissions from Transportation Refrigeration Units (TRUs) in Basin

The DEIR does not appear to include any analysis of emissions from diesel-fueled TRUs within Basin and it is not clear how the emissions from TRUs going to the BIG facility will affect emissions within Basin as the activity will differ from trucking. For example, TRUs coming in through the ports typically use 40-foot or 20-foot containers. If these refrigerated goods are currently transloaded for long haul trucking in warehouses located within South Coast AQMD, the common assumption is that three 40-foot containers can be put into two 53-foot containers. Therefore, while transporting goods via rail has the potential to reduce truck trips, for refrigerated goods, rail activity may increase the number of diesel TRUs by avoiding transloading and keeping goods moving in individual 40-foot or smaller containers, each with their own TRU. The Final EIR should include an analysis of how TRU emissions would change in Basin, and whether that would affect the significance determination. The Final EIR should also clarify how the number of TRUs was determined. L17-65

[48] CEQA Guidelines Section 15144 and 15151
[49] CEQA Guidelines Section 15125(d) and Checklist Appendix G, III (a)

Conclusion

As set forth in Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as noted in CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

L17-66

RESPONSE TO COMMENT LETTER L17, SCAQMD

L17-1 Commenter raises some concerns about the Draft EIR's analysis that are best addressed by sharing technical and scientific information, which is provided below. This comment provides a general introduction to the comments raised in this letter. See below responses. See **Consolidated Response 04** concerning general non-CEQA issues.

L17-2 This comment provides a summary of the commenter's view of the Project. This comment does not raise an issue regarding the adequacy of the analysis contained in the Draft EIR; therefore, no further response is required.

L17-3 This comment provides a general summary of the comments raised in this letter. This comment does not raise an issue regarding the adequacy of the analysis contained in the Draft EIR; therefore, no further response is required.

L17-4 Regarding the enforceability of the use of Tier 4 locomotives, the use of Tier 4 locomotives would be a binding and enforceable commitment, as explained in **Consolidated Response 12-03** concerning enforceability of the Project components and mitigation measures for the Project. Also see **Consolidated Response 05** and **Response S17-38** concerning feasible and enforceable mitigation and the feasibility of phasing mitigation. See **Consolidated Response 05-03** concerning zero-emission technologies. Also see **Response S6-2**, which explains that BNSF has entered into a Memorandum of Understanding with MDAQMD to implement a demonstration program of five hybrid linehaul locomotives that consume less fuel and generate lower emissions than traditional diesel locomotives during mainline operations. This demonstration program is intended to evaluate if hybrid locomotives could become feasible.

L17-5 This comment provides a concluding summary of the comments raised in this letter. Responses to the specific comments contained in this letter are provided below.

L17-6 This comment provides a general conclusion and contact information regarding this letter. This comment does not raise an issue regarding the adequacy of the analysis contained in the Draft EIR; therefore, no further response is required.

L17-7 This comment provides a summary of the commenter's view of BIG and the BIG Specific Plan. Responses to the comments contained in this letter are provided below. This comment does not raise an issue regarding the adequacy of the analysis contained in the Draft EIR; therefore, no further response is required.

L17-8 See **Response L17-7**.

L17-9 See **Response L17-7**.

L17-10 This comment provides a concluding statement and refers to the specific comments in the letter. Responses to the specific comments contained in this letter are provided below. This comment does not raise an issue regarding the adequacy of the analysis contained in the Draft EIR; therefore, no further response is required.

L17-11 This comment provides a summary of the commenter's view of BIG. Responses to the comments contained in this letter are provided below. This comment does not raise an issue regarding the adequacy of the analysis contained in the Draft EIR; therefore, no further response is required.

L17-12 This comment summarizes the commenter's view of emissions reduction obligations. The commenter acknowledges that emissions from locomotives are regulated by the federal government. BIG includes a dedicated fleet of Tier 4 locomotives which would operate on the rail corridor within the commenter's jurisdiction and within the jurisdiction of the MDAQMD. Tier 4 locomotives are the cleanest commercially available locomotives, meet the most stringent U.S. EPA emissions standards for freight locomotives, and offer a proven and reliable means to achieve substantial emissions reductions. The Draft EIR also included all feasible mitigation measures that would additionally reduce emissions on the rail corridor. See **Draft EIR Section 5.3: Air Quality** (page 5.3-109), **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 05-06** concerning the feasibility of specific technology and other mitigation measures. This comment does not raise an issue regarding the adequacy of the analysis contained in the Draft EIR; therefore, no further response is required.

L17-13 This comment generally summarizes the commenter's view of the health effects of certain pollutants. This comment does not raise an issue regarding the adequacy of the analysis contained in the Draft EIR; therefore, no further response is required.

L17-14 This comment concerns air quality benefits from the use of Tier 4 locomotives and the replacement of truck trips. Regarding the enforceability of the Tier 4 dedicated fleet, the use of Tier 4 locomotives would be a binding and enforceable commitment, as explained in **Consolidated Response 12-03** concerning enforceability of the Project components and mitigation measures for the Project. See **Consolidated Response 12-03** concerning enforceability of the Project components and mitigation measures for the Project. Also, **Response L17-4. Draft EIR Appendix 5.15 BIG-1 CEQA Assessment – Transportation Analysis Section 8.1: Truck Miles Traveled** includes analyses relevant to this comment's concerns regarding the replacement of truck trips. See also **Response S3-2** concerning transportation, and **Responses L17-16** through **L17-18** concerning capacity, markets, project description, and needs issues.

The analyses underpinning rail and truck traffic projections in the Draft EIR are neither speculative nor unsubstantiated. BNSF has submitted to the City a report titled *Market Benefits of the Barstow International Gateway* [54]. The *Market Benefits Report* explains the basis, grounded in BIG's site design and informed by BNSF's unmatched experience in operating and improving a vast freight-rail infrastructure network, for concluding that BIG will prompt Beneficial Cargo Owners (BCOs) to shift a portion of their containerized freight that moves through the Ports and currently transloads to long distance truck-borne conveyance to its ultimate destination ("Transload to Long-Distance Truck") into a new rail centric model

[54] Available on the City website: https://www.barstowca.org/home/showpublisheddocument/14679/639035642389670000.

("Cross-Dock Intermodal"). As the - explains and substantiates, this transition will be encouraged by reducing cost, improving reliability, increasing container end-to-end cycle times, eliminating drayage inefficiencies, and creating an integrated, centralized -supply chain system that removes the pain points of today's processes for moving transloaded freight by rail from Southern California to nationwide destinations. The Cross-Dock Intermodal mode enabled by BIG is a closed-loop, fully integrated rail and onsite transload system in which:

- International containers go directly from ships to on-dock rail at the Ports,
- Travel by dedicated daily rail service to BIG,
- Are moved by electric hostlers to BIG's on-site transload warehouse center,
- Are transloaded on-site into 53' domestic containers,
- And are then loaded back onto outbound domestic intermodal trains to final destinations across the United States.

BIG enables all transloading and intermodal handoffs to occur on one integrated site, requiring only 0.5–3.0 miles of drayage (from the transload warehouse center to BIG's intermodal facility, or vice versa) via electric hostlers instead of long highway trips via heavy-duty trucks. The new Cross-Dock Intermodal mode:

- Significantly reduces trucking associated with transloading
- Eliminates multi-party handoffs for truck/warehouse/dray arrangements, consolidating operations under BNSF as a single coordinating entity for the service from the Ports to BIG to inland rail hubs
- Reduces delays, port dwell, and variability
- Enables push-pull inventory strategies with onsite warehousing[55]
- Allows for a lower-cost, faster, and more reliable, lower-cost inland rail service

This new Cross-Dock Intermodal system overcomes the traditional drawbacks of Transload to Rail[56] (inefficiencies in the cost, speed, and reliability of container conveyance) that are barriers today to converting volume that moves in the Transload to Long-Distance Truck mode. It provides the inventory benefits of transloading while also offering the cost efficiency and environmental advantages of long-haul rail, making it an alternative to long-distance trucking for high-volume BCOs that is also scalable, enabling growth up to 9 million square feet.

The *Market Benefits Report* describes the current shortcomings of the Transload to Rail container transport mode that discourage BCOs from converting conveyance of their freight from long-distance trucking to rail. In summary, shippers that prefer Transload to Long Distance Truck conveyance do so because it is currently cheaper, more reliable, and faster than Transload to Rail. This stems from longer rail processing times, multiple handoffs, rail volume building requirements, and increased variability across steps of the rail pathway.

BIG will solve the key short-comings of the current Transload to Rail model and create a marketable alternative to long-distance trucking, encouraging BCOs to direct freight that

[55] Defined in full on page 2 of the *Market Benefits Report*.
[56] This and other transportation modes are defined and explained in the *Market Benefits Report*.

currently moves through the Transload to Long-Distance truck model to the Cross-Dock Intermodal mode at BIG. The *Market Benefits Report* describes the benefits that BIG will provide to customers. In summary, BIG enables intermodal to compete on cost, reliability, speed, and operational simplicity, making it a compelling and preferred alternative to long distance trucking. Based on these reasonable, fact-based projections about the attractions of the cross-dock intermodal container mode that BIG uniquely facilitates, BNSF anticipates that BCOs will shift the volumes of freight anticipated in the Draft EIR away from existing truck-dependent modes to BIG.

Additionally, BIG is forecast to reduce truck miles traveled by providing an IMF closer to container origins/destinations than currently exists. As noted in the **Draft EIR Appendix 5.15 BIG-1, Section 8.1 Truck Miles Traveled** (page 138), while the IMF's primary purpose is the Cross-Dock Intermodal system described above, a small percentage of containers served by the IMF would arrive at the IMF via heavy-duty truck to reduce the travel distance and/or travel time due to traffic conditions that the container would otherwise encounter under No BIG Baseline Conditions. Based on BNSF market research, it is expected that most containers that would utilize BIG as a traditional IMF would originate at/be destined for Boron (California), the Central Valley (California), Victorville (California), and Las Vegas/Arizona (Nevada/Arizona). Refer also to **Table 41: IMF Truck Miles Traveled Assumptions and Variables** (pages 139-140) of the same section for information regarding container trucking distances under No BIG Baseline and Plus BIG conditions, which helps illustrate the truck miles traveled reduction that would occur with BIG.

Last, it would be far more speculative to assume increased rail traffic *and* increased truck traffic in a BIG scenario, rather than a tradeoff between that traffic, as is assumed by the *Market Benefits Report* and Draft EIR, which is supported by substantial evidence.

L17-16 See **Response O21-4** and **Response L17-15** regarding the market benefits that BIG would provide to potential customers substantiating that BIG would represent a purpose-built solution to solve existing market factors (speed, reliability, and cost) that prevent a portion of existing heavy-duty truck-borne containers from shifting to rail. The analyses underpinning rail and truck traffic projections in the Draft EIR are neither speculative nor unsubstantiated, and therefore are consistent with State CEQA Guidelines § 15145. They are supported by substantial evidence in **Draft EIR Appendix 5.15 BIG-1** as well as the *Market Benefits Report*, available on the City website. The *Market Benefits Report* demonstrates how BIG would make rail transport more economical than trucks for long hauls. It describes in detail the market conditions that would lead to the traffic changes used in the impact analyses in the Draft EIR.

Moreover, BIG is designed, as described in the Project Description, precisely to replace truck traffic with rail traffic. The *Market Benefits Report* (Figure 1, page 5) demonstrates this value proposition and the market conditions that would enable switching from truck to rail. Both this response and the *Market Benefits Report* explain why shippers that use the Transload to Long Distance Truck model prefer it today: longer rail processing times, higher drayage distances, multiparty handoffs, greater variability, and slower cycle times. These operational challenges, not a lack of demand for rail, are what suppress rail volumes today. In summary,

while BIG's market-based projections depend on shipper decisions, they are grounded in demonstrated operational advantages, conservative market shares, and well documented freight behavior trends. These factors collectively provide substantial evidence supporting the reasonableness of the assumptions, as required by State CEQA Guidelines § 15384. CEQA does not require, and indeed forbids, an EIR to analyze operation of a proposed project under a scenario that is unsupported by substantial evidence. Therefore, the commenter's demand that the EIR analyze the operation of BIG as proceeding under an alternative scenario, that is contrary to the substantial evidence-supported assumptions that underlie its reasonable projections, is not required.

L17-17 This comment requests that the EIR base its environmental impact evaluation on assumptions about BIG's future operations that, as explained in the Draft EIR and herein, are shown by substantial evidence to be inconsistent with the reasonably foreseeable future operations of BIG based on the Project Description. The analysis requested by this comment is therefore contrary to the letter and spirit of CEQA.[57,58] See **Response L17-18**.

While some inbound and outbound trucking activity will occur at the BIG site (described in **Draft EIR Appendix 5.15 BIG-1,** page 130 to 137), these trucking moves are not the economic basis of the facility and cannot support an investment of the scale that BNSF is proposing. For BIG to deliver meaningful value, the majority of freight must move by rail, enabled by:

- Direct on-dock rail service from the Ports to BIG
- Onsite transloading that eliminates 30–60 mile Inland Empire drays
- Minimal onsite truck movements (0.5-3 miles)
- Outbound domestic intermodal service for long-distance markets

If freight were instead trucked 130 miles from the Ports to BIG for transloading, BIG's purpose in terms of relative advantages in cost, speed, and reliability would be wholly negated. For this reason, trucks traveling between the Ports and BIG are expected to make up under 2% of the total truck trips associated with BIG in each analysis year (**Draft EIR Appendix 5.14 BIG-1** page 142 et seq.). Long-haul trucking imposes additional drayage cost, increases transit time, and erodes the inventory and operational benefits BIG is designed to provide. Moreover, loads trucked from the ports into BIG would forfeit the continuous end-to-end visibility and coordinated operational control enabled by the integrated cross-dock intermodal solution, placing these shipments at a structural disadvantage relative to the designed BIG operating model.

BIG is designed to address a different market segment: freight that currently transloads and then moves long-haul by truck because today's Transload to Rail options are slower, less reliable, or more complex than trucking and do not meet the needs of this freight. BIG overcomes those barriers through direct on-dock rail, integrated onsite transloading, single entity coordination, reduced cycle times, and dramatically shorter drayage.

[57] *Laurel Heights Improvement Assn. v. Regents of the Univ. of Cal.* (1988) 47 Cal.3d 376.
[58] *City of Long Beach v. City of Los Angeles* (2018) 19 Cal.App.5th 465.

In summary, while some trucking in and out of the site is expected (discussed in **Draft EIR Appendix 5.15 BIG-1**), BIG creates value for BNSF and shippers when primary freight flows move by rail. Operating BIG as a conventional transload facility fed primarily by long truck drays from the Ports would not deliver customer value nor justify a multi-billion dollar investment. The truck traffic assumptions underlying BIG are therefore reasonable and supported by substantial evidence.

Likewise, while shippers currently utilizing the Transload to Rail mode could shift freight to move in the closed-loop, Cross-Dock Intermodal mode at BIG, thereby reducing truck miles, shifting this freight from current BNSF rail terminals, as the primary volume for BIG, would not justify the scale of BNSF's investment. BIG's role is to offer a new rail centric alternative that competes with long-haul trucking. As described above and in *Capacity at BNSF Los Angeles Hobart and San Bernardino Railyards*, or "*BNSF Hobart and San Bernardino Railyard Capacity Memorandum*", existing BNSF facilities individually can accommodate the projected lifts through 2048 with process improvements, even if no containers are reallocated to BIG from Hobart/Commerce and San Bernardino IMFs. Therefore, BIG's IMF is not needed to handle market growth in Southern California at BNSF's existing Hobart/Commerce and San Bernardino IMFs. Furthermore, given BIG's market benefits apply to Transload to Rail moves, BIG would not benefit Transload to Long-Distance Truck moves. Thus, there is no substantial evidence that BIG would result in containers being trucked from transload facilities in the LA Basin and Inland Empire to BIG.

See also **Responses L17-15, L17-16,** and **L17-18.**

L17-18 CEQA requires an EIR to make a good-faith effort at full disclosure using reasoned forecasts supported by substantial evidence; it does not require worst-case assumptions or speculation about uncertain market behavior (State CEQA Guidelines §§ 15144, 15145, 15151). The Draft EIR's with- and without[59] project transportation and emissions forecasts are grounded in (a) reasonable growth forecasts and assumptions that are supported by substantial evidence,[60] (b) project description, project[61]specific operating constraints and facility design,[62,63] and (c) the best available methodologies and known regulatory requirements. With respect to (c), an EIR's impact analysis may be based on informed judgments by experts who prepare the EIR.[64] The lead agency and its experts have discretion to determine the appropriate way to analyze environmental impacts in an EIR. Disagreements with an EIR's impact analysis will be resolved in favor of the lead agency if there is any substantial evidence in the record supporting the approach used. This constitutes substantial evidence under CEQA. See **Consolidated Response 13** concerning substantial evidence and good faith disclosure.

59 See CEM Memo (Appendix B to Appendix 5.3 BI-1), and CEM Errata.

60 **Draft EIR Appendix 5.15 BIG-1, Section 8.1 Truck Miles Traveled** includes a detailed quantification and analysis of changes to Truck Miles Traveled (TMT) with BIG (pages 130-145).

61 *Market Benefits Report*.

62 Section 3.0, Project Description, of the Draft EIR.

63 *Saltonstall v. City of Sacramento* (2015) 234 Cal.App.4th 549, 583.

64 *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 409.

Modal Shift is from Truck to Rail is the Fundamental Part of the BIG Project Description

Commenter characterizes BIG's modal shift as from truck to rail as a speculative assumption, and not a fundamental aspect of the project description (**Draft EIR Section 3.0** pages 3-52 through 3-53). This issue was directly addressed in *City of Long Beach v. City of Los Angeles* (2018) 19 Cal.App.5th 465, which involved BNSF's Southern California International Gateway ("SCIG") project, a proposed new railyard located approximately four miles from the Port of Los Angeles.[65] Similar to BIG, under SCIG, goods that arrive at the Ports in international containers that were already destined for BNSF existing Hobart railyard would be transported by rail instead of by truck. Thus, both SCIG and BIG are mode shift projects where goods are transported by rail instead of truck. The SCIG project opponents argued that "the description of the project is misleading and inaccurate because it defines the project as replacing—rather than increasing—existing BNSF capacity".[66] More specifically, they argued "by defining the project not as creating *additional* capacity to handle *increased* cargo volumes, but as 'eliminating' existing activities at Hobart, the EIR 'profoundly skews the environmental analysis'".[67] The court disagreed, holding that the project description, namely "the construction and operation of a new near-dock intermodal rail facility by BNSF that would handle containerized cargo transported through the ports of Los Angeles and Long Beach," accurately describes the pertinent features of the construction and operation of SCIG.[68] The court stated:

> Respondents improperly characterize the project description. The FEIR accurately states that the project will permit BNSF to divert a portion of its operations from Hobart to SCIG and also acknowledges that the volume of cargo serviced at Hobart will continue to grow. *Neither the project description nor any part of the FEIR suggests that BNSF's total capacity will remain unchanged as a result of the project.* There is nothing misleading or inaccurate about the project description.[69]

Substantial evidence in the record supports the Project Description. BNSF has submitted to the City a report entitled *Market Benefits of the Barstow International Gateway* (Market Benefits Report). The *Market Benefits Report* explains the basis, grounded in BIG's unique site design and informed by BNSF's expertise and experience in operating and improving a vast freight-rail infrastructure network, for concluding that BIG will prompt Beneficial Cargo Owners (BCOs) to shift to rail a portion of their containerized freight that moves through the Ports and currently transloads to long- distance truck-borne conveyance to its ultimate destination ("Transload to Long-Distance Truck") into a new rail-centric model ("Cross-Dock Intermodal"). As the *Market Benefits Report* explains and substantiates, this transition will be encouraged by reducing cost, improving reliability, increasing container end-to-end cycle times, eliminating drayage inefficiencies, and creating an integrated, centralized supply-chain system that removes the pain points of today's processes for moving transloaded freight by

65 *City of Long Beach v. City of Los Angeles* (2018) 19 Cal.App.5th 465.
66 19 Cal.App.5th at 477.
67 *City of Long Beach v. City of Los Angeles* (2018) 19 Cal.App.5th 465.
68 *City of Long Beach v. City of Los Angeles* (2018) 19 Cal.App.5th 465.
69 *City of Long Beach v. City of Los Angeles* (2018) 19 Cal.App.5th 489.

rail from Southern California to nationwide destinations. See **Response L17–15** and **Response L17-16**.

Further, BIG directly advances the goals of the Climate Action Plan for Transportation Infrastructure developed by the State Transportation Agency[70] and embodies the State's policy for an integrated, resilient, and low-carbon freight system. Indeed, BIG is cited in the 2024 State Rail Plan,[71] underscoring BIG's unique value as the first facility of its kind developed by a Class I railroad. These benefits – including the environmental benefits associated with transporting goods by rail rather than truck as recognized by the State Rail Plan – are unique and marketable selling points to BIG's potential customers. Despite this evidence, commenter relies on unsupported speculation and, like the opponents in *City of Long Beach*, "improperly characterize[s] the project description" as an assumption. Moreover, **Consolidated Response 05-05** demonstrates there is a binding and enforceable commitment to implement the BIG project components. In sum, the Draft EIR sets forth the analyses of BIG's potential direct and indirect impacts based on assumptions that are supported by substantial evidence.

Draft EIR Assumptions Are Supported by Substantial Evidence

The assumptions in the Draft EIR are supported by substantial evidence in the record:

- BIG's primary operational purpose is to consolidate and move international containers by rail between the San Pedro Bay Ports and the inland facility, including block-swapping and intermodal train formation. As described above, this is a fundamental aspect of the project description (see **Draft EIR Section 3.0: Project Description**).
- A defined rail-to-truck throughput ratio based on the amount of goods as described in **Draft Section 3.0: Project Description** (see page 3-52, "Other Operations"). The assumed rail-to-truck throughput relationship reflects the Project's port-oriented intermodal business model and is based on goods movement logistics, not regulatory constraints. The Draft EIR assumes that the majority of containers handled at the facility are port-associated international containers, rather than domestic truckload freight, consistent with the definitions and operational context provided in Draft EIR **Table 3-1: Key Railroad Terms and Definitions** and **Table 3-2: Transload Definition**, as well as **Table 3-13: BIG IMF and Block Swap Estimated Annual Container Volumes**. These tables establish the distinction between international container handling, transload activity, and domestic freight movements and provide the analytical foundation for the emissions inventory assumptions.
- BIG's shift from trucks to trains and TMT reductions are based on market research and industry data evaluating rail intermodal demand, logistics efficiency, and port-related cargo flows; see **Response L17-15**. These assumptions reflect how BIG is expected to operate in the marketplace, rather than speculative basin-wide "market capture," and are applied solely for purposes of quantifying on-site and BIG-related emissions.

[70] Available on the City website: https://www.barstowca.org/home/showpublisheddocument/14679/639035642389670000.
[71] https://calsta.ca.gov/-/media/calsta-media/documents/capti-2025-a11y.pdf.

- BNSF facilities have sufficient capacity to meet current and future demand without need for expansion (see the *BNSF Hobart and San Bernardino Railyard Capacity Memorandum* and the *BNSF Barstow International Gateway Corridor Emissions Model Analysis Errata* ("*CEM Errata*") containing the compound annual growth rate (CAGR) analysis, which relies on historical container volume trends and associated train trip data).
- Rail growth rates are based on historical change in container volumes and associated train trips (see *CEM Errata*).
- A throughput and a business model that assumes that most containers handled are port-associated international moves, not domestic truckload freight, based on the unique market benefits BIG would occur (see the *Market Benefits Report*). See **Table 3-13: BIG IMF and Block Swap Estimated Annual Container Volumes**. BIG's transload warehouses are proposed to handle the containers from the cross-dock intermodal move, and as noted in the Draft EIR Project Description.
- "BNSF would include contractual obligations as a condition of warehouse occupants' use of the land to develop and operate the warehouses that would include volume commitments for long-haul container movements from BIG on BNSF's rail network, utilizing the unique cross-dock intermodal/ closed loop operation with the intermodal facility" (page 3-55).
- On-site truck activity remains for first/last-mile drayage and intra-facility moves; those truck emissions are explicitly modeled in the Project scenario.

Consistent with this evidence, the Draft EIR's emissions inventory explicitly models all relevant project-related emission sources, including on-site locomotives, on-site and connecting drayage trucks, cargo handling equipment, employee vehicle trips, and rail line-haul operations. Truck activity associated with first- and last-mile drayage and intra-facility movements is fully accounted for in the analysis. The analysis does not assume restrictions on truck access or rely on speculative regional diversion effects; instead, it quantifies emissions based on defined operational assumptions that are directly supported by substantial evidence in the record. Thus, the Draft EIR's emissions inventory does not rely on speculative basin-wide "market capture" reductions and instead quantifies emissions from on-site locomotives, on-site and connecting drayage trucks, cargo handling equipment, employee trips, and rail line-haul as applicable based on substantial evidence.

Induced Emissions Are Not Reasonably Foreseeable

The comment conflates regional cargo growth (addressed in the No Project condition) with Project-caused changes in mode choice (see discussion of project description above). Under CEQA, an EIR must evaluate reasonably foreseeable project-induced effects; it is not required to attribute to the project regional growth that would occur regardless under adopted forecasts, which are unaffected by the project.[72] The Draft EIR treats growth consistently by:

[72] https://dot.ca.gov/-/media/dot-media/programs/rail-mass-transportation/documents/california-state-rail-plan/2024-ca-state-rail-plan-a11y.pdf. Page 41-42.

- Using rail growth rates based on historical change in container volumes and associated train trips (see *CEM Errata*);
- Assigning that growth to the No Project and cumulative impacts analysis scenarios whether or not BIG is built; and
- Evaluating the Project's incremental change in emissions relative to those scenarios.

Because BIG is a modal efficiency project that shifts a defined share of port-related containers from truck to rail for the long-haul portion of the move, the reasonably foreseeable effect is truck miles traveled (TMT) reductions on highway and roads, not creation of new demand.[73,74] Potential re-capture of national market share at POLA/POLB is a macro-economic outcome dependent on global shipper decisions, terminal capacity, labor, tariffs, routing, and competing gateways; attributing such region-wide shifts specifically to BIG would be speculative (State CEQA Guidelines §15145). The Draft EIR therefore properly addresses growth in the No Project condition analysis and does not assign it as a direct Project effect.

Summary

BIG's shift from trucks to trains and TMT reductions are based on market research; see **Response L17-15**. The Draft EIR's statements about potential broader benefits are contextual, not analytical assumptions. The air quality conclusions do not depend on region-wide port recapture or basin-wide truck reductions that are outside the Project's control and therefore are not direct or indirect effects of BIG. The binding commitment to implement the project as described in the Project Description as discussed above ensure that regardless of regional market share, BIG functions as a rail-first facility and the Draft EIR sets forth analyses of all potential direct and indirect impacts of BIG based on assumptions that are supported by substantial evidence in the record.

In summary, the substantial evidence above shows, "there was sufficient evidentiary basis for the [lead agency's] conclusion that a predicted amount of economic growth will occur with or without this project and that the project is not necessary to enable BNSF to service the projected growth... any such growth is not an indirect impact of the... project that the FEIR was required to study."[75]

L17-19 See **Responses S6-7, S6-8, S6-12, S6-13, S6-14**, and **S6-15** and **Consolidated Response 05** concerning feasible and enforceable mitigation. Additionally, see **Consolidated Response 12** concerning the Project Description and enforceability and **12-03** concerning enforceability of the Project components and mitigation measures for the Project. Further, as a result of BIG implementation diesel particulate matter (DPM) emissions would be reduced from existing conditions. Additionally, the NO_x emissions would be below standards and applicable thresholds of significance. Finally, see **Consolidated Response 17**, which provides information detailing that BIG would not cause adverse health effects in the South Coast Air Basin.

[73] *City of Long Beach v. City of Los Angeles* (2018) 19 Cal.App.5th 465, 478-82.
[74] *City of Long Beach* (2018) 9 Cal.App.5th at 478-82.
[75] C*ity of Long Beach* (2018) 19 Cal.App.5th at 482.

L17-20 BNSF would enter into a binding and enforceable agreement with the City to enforce various components of BIG design including a dedicated fleet of newly purchased Tier 4 locomotives. See **Consolidated Response 12-03** concerning enforceability of the Project components and mitigation measures for the Project.

L17-21 This comment asserts that the Draft EIR's treatment of a dedicated fleet of Tier 4 locomotives to carry containers between the Ports and the BIG IMF, and of replacement of switcher locomotives at the Barstow Yard as BIG project design features rather than mitigation measures is inconsistent with case law.[76] (See comments L 17-20, L 17-21, and L17-22.) This comment also asserts that parts of BIG are not enforceable through mitigation. BNSF would enter into a binding and enforceable agreement with the City to enforce various components of BIG design as well as mitigation measures. See **Consolidated Response 12-03** concerning enforceability of the Project components and mitigation measures for the Project. Furthermore, as discussed below, the case law cited by commenter is not applicable to the Draft EIR's treatment of these features, and other, more relevant case law demonstrates that they were properly analyzed under CEQA.

The case cited by commenter, *Lotus,* concerned an EIR for a Caltrans highway construction project through an old growth redwood forest. Certain "avoidance, minimization and/or mitigation measures," including restorative planting, removal of invasive plants, and the use of an arborist and specialized equipment, were identified as project features by Caltrans, and the EIR, prepared by Caltrans, determined that the project including those features would have less-than-significant impacts. The court rejected this approach, holding that, since these measures were intended to "avoid and minimize impacts as well as to mitigate expected impacts," the EIR should instead have treated them as "mitigation measures" rather than project features. The court held that "[s]hould [the lead agency] determine that *a specific tree or group of trees* would be significantly impacted by proposed roadwork, that finding would trigger the need to consider a range of *specifically targeted mitigation measures*." (Emphasis added.) The court in *Lotus* therefore concluded that the EIR omitted required information by failing to analyze project impacts both with and without the measures at issue, as CEQA requires in discussion of mitigation measures.

However, subsequent cases have circumscribed the holding in *Lotus* with respect to features proposed for constant and unvarying application under the project, rather than on a case-by-case basis depending on whether a significant impact would occur in their absence. For example, *Berkeley Hillside Preservation v. City of Berkeley* (2015), held that a traffic-management plan, identified as an environmentally protective project component that would be applied consistently throughout construction of a proposed residential structure, did not have to be treated as a "mitigation measure" under CEQA.[77] The court held that the traffic-management plan was not a "proposed *subsequent action* taken to mitigate any significant effect of the project," unlike the "avoidance, minimization and/or mitigation measures," at issue in *Lotus* (emphasis added). In support of this holding, *Berkeley Hillside Preservation* cited

[76] *Lotus v. Department of Transportation* (2014) 223 Cal.App.4th 645.
[77] *Berkeley Hillside Preservation v. City of Berkeley* (2015) 241 Cal.App.4th 943. (*Berkeley Hillside Preservation*).

Save the Plastic Bag Coalition v. City and County of San Francisco (2013) in which court held that the imposition of a 10-cent fee as part of an ordinance restricting the use of disposable bags at retail stores was, "from the inception, 'part of the project design' which directly addressed the problem of single use bags, a problem that preexisted the proposed project. It was not a 'mitigation measure' to try to alleviate some perceived difficulties in the original plan."[78]

By analogy to the project features at issue in the above-described cases, the dedicated fleet of Tier 4 locomotives, proposed in the project definition (found in **Draft EIR Section 3.0: Project Description**, page 3-52) to be used to transport all rail-borne containers between the San Pedro Bay Ports and the BIG IMF, is properly analyzed under CEQA as an intrinsic project component, rather than a "proposed subsequent action" that would be taken to mitigate potentially significant impacts if and when they arise, as were those which *Lotus* required be analyzed as mitigation measures. Also see **Response L17-18.** See **Consolidated Response 12** concerning the Project Description and enforceability, and **Consolidated Response 12-03** concerning enforceability of the Project components and mitigation measures for the Project.

Furthermore, environmentally protective measures that are not central components of the project definition may be analyzed as project features rather than as mitigation measures so long as an EIR analyzes and discloses project impacts both with and without those features. In *Mission Bay Alliance v. Office of Community Investment & Infrastructure* (2016), the court held that an EIR that identified a city special events transit service ("Muni TSP") as a component of a basketball arena project rather than as a mitigation measure did not violate CEQA where it analyzed impact both with and without implementation of the Muni TSP.[79] The court stated the rule as follows: "Any mischaracterization [of mitigation measures as components of the project] is significant, however, only if it precludes or obfuscates required disclosure of the project's environmental impacts and analysis of potential mitigation measures."[24] As detailed throughout **Draft EIR Section 5.3** and **Section 5.8**, BIG environmental analysis carefully considered impacts with and without incorporation of the Barstow Yard switcher replacement.

L17-22 The Tier 4 Dedicated Fleet is a binding and enforceable component of BIG and is not a mitigation measure and therefore is not subject to CEQA's monitoring requirements. (State CEQA Guidelines §15091(d).) See **Response L17-14** and **Consolidated Response 12** concerning the Project Description and enforceability and **Consolidated Response 12-03** concerning enforceability of the Project components and mitigation measures for the Project.

L17-23 BIG includes contractual requirements applicable to future warehouse users; however, it acknowledges a proportion of the containers may still arrive at or depart from the facility by truck under certain operational circumstances. Such truck activity could occur due to proximity considerations relative to existing IMFs, the capturing of new or shifting market streams, the handling of time-sensitive port-related containers not aligned with available rail

[78] *Save the Plastic Bag Coalition v. City and County of San Francisco* (2013) 222 Cal.App.4th 863.
[79] *Mission Bay Alliance v. Office of Community Investment & Infrastructure* (2016) 6 Cal.App.5th 160.

departure schedules, or a limited volume of goods destined for the Inland Empire (Appendix 5.15 BIG-1, page 133-140).

Consistent with BNSF's rail business model, BNSF would include minimum volume commitments to support long-haul rail movements, as described in the Draft EIR. The volume commitments would not cap or prohibit truck trips, recognizing that cargo owners in the logistics industry need flexibility. Imposing a cap or an outright prohibition on truck trips would impair BIG's ability to reduce regional truck trips. Regional truck trips would continue, as they do today, to one of BNSF's other IMFs in San Bernardino or Los Angeles, eliminating one of the emissions benefits of BIG. Furthermore, a limitation on truck trips, while only a small percentage of total container volume forecasted at BIG, would remove all flexibility for the cargo owner, making BIG far less appealing to potential customers and substantially harming its market viability.

L17-24 The comment suggests that the Draft EIR's emissions inventory is "internally inconsistent" and improperly segments emissions from BIG and the proposed General Plan. However, the Draft EIR evaluates BIG as part of the proposed General Plan and accounts for emissions accordingly. The emissions inventories in **Draft EIR Section 5.3: Air Quality Table 5.3-17: Horizon Year 2048 Proposed General Plan Area Regional Criteria Air Pollutant Emissions Inventory Above Existing Conditions Within MDAB** (page 5.3-76) and **Table 5.3-18: Horizon Year 2048 Proposed General Plan Area Annual Regional Criteria Air Pollutant Emissions Inventory Above Existing Conditions Within MDA** (page 5.3-77) (General Plan communitywide emissions) include emissions associated with BIG. The comment appears to reflect a conflation of these proposed General Plan emissions tables. **Draft EIR Table 5.3-17** (page 5.3-76) and **Table 5.3-18** (page 5.3-77) provide the proposed General Plan emissions inventories. As BIG is part of the proposed General Plan, BIG emissions are included in the proposed General Plan inventories. **Draft EIR Table 5.3-17** (page 5.3-76) and **Table 5.3-18** (page 5.3-77) include BIG's mobile source emissions in the proposed General Plan community emissions (denoted by the on-road transportation row labeled "including BIG"). The remainder of the BIG emissions are included under the "BIG Emissions – MDAB" category.

L17-25 See **Response L17-24**. The comment further states that **Draft EIR Table 5.3-17** (page 5.3-76) and **Table 5.3-18** (page 5.3-77) exclude mobile-source and locomotive emissions without explanation; however, this appears to be based on a conflation of how emissions are presented in the tables. As noted in **Response L17-24**, **Draft EIR Table 5.3-17** (page 5.3-76) **and Table 5.3-18** (page 5.3-77) include BIG emissions in two places, depending on the source category. BIG mobile-source emissions are included within the proposed General Plan "on-road transportation" category. Both tables contain an on-road transportation line item labeled "On-Road Transportation (including BIG)". This line item already includes BIG-related on-road mobile-source emissions. These include BIG-related on-road vehicle trips (employee trips, vendor trips, etc.), BIG-related heavy-duty truck trips occurring within the communitywide roadway network, and any other on-road vehicle miles traveled (VMT) attributable to BIG. Accordingly, the Draft EIR does not omit BIG mobile-source emissions; rather, these emissions are consolidated with other communitywide on-road emissions to produce a complete, unified General Plan emissions inventory. Had the proposed General

Plan emissions analysis not included mobile source emissions attributable to BIG, the analysis would have been incomplete as it would be missing a contributing emissions source to the proposed General Plan. But the proposed General Plan emissions analysis does include the BIG emissions.

L17-25 See **Response L17-24**. The comment further states that **Draft EIR Table 5.3-17** (page 5.3-76) and **Table 5.3-18** (page 5.3-77) exclude mobile-source and locomotive emissions without explanation; however, this appears to be based on a conflation of how emissions are presented in the tables. As noted in **Response L17-24**, Draft EIR **Table 5.3-17** (page 5.3-76) and **Table 5.3-18** (page 5.3-77) include BIG emissions in two places, depending on the source category. BIG mobile-source emissions are included within the proposed General Plan "on-road transportation" category. Both tables contain an on-road transportation line item labeled "On-Road Transportation (including BIG)". This line item already includes BIG-related on-road mobile-source emissions. These include BIG-related on-road vehicle trips (employee trips, vendor trips, etc.), BIG-related heavy-duty truck trips occurring within the communitywide roadway network, and any other on-road vehicle miles traveled (VMT) attributable to BIG. Accordingly, the Draft EIR does not omit BIG mobile-source emissions; rather, these emissions are consolidated with other communitywide on-road emissions to produce a complete, unified proposed General Plan emissions inventory. Had the proposed General Plan emissions analysis not included mobile source emissions attributable to BIG, the analysis would have been incomplete as it would be missing a contributing emissions source to the proposed General Plan.

Non-road BIG emissions are included in the proposed General Plan communitywide emissions under the "BIG Emissions – MDAB" category. In addition to the on-road category, BIG emissions that do not fall under the on-road transportation bucket, such as locomotive emissions, cargo-handling equipment, stationary/area sources, and other non-road mobile sources are presented in the tables under the separate category "BIG Emissions – MDAB". This category ensures that 100 percent of BIG's non-road and stationary emissions are accounted for within the same proposed General Plan emissions inventory.

The commenter is mistaken that locomotive emissions were omitted. Locomotive emissions appear in the Draft EIR under the "BIG Emissions – MDAB" category. They were not omitted; they were simply accounted for under BIG's off-road mobile-source emissions rather than within the on-road transportation category. Since locomotives are not on-road mobile sources, placing them under the BIG Emissions – MDAB category is the technically correct category and does not constitute segmentation. State CEQA Guidelines are not rigid in requiring a certain format for presentation of analysis nor do they specify where an analysis results should be disclosed in an EIR.[80] But the proposed Plan emissions analysis does include the BIG emissions.

L17-26 See **Responses L17-24** and **L17-25**. As noted above, emissions were accounted for under BIG's off-road mobile-source emissions rather than within the on-road transportation category.

[80] *Whitman v. Board of Supervisors* (1979) 88 Cal.App.3d 397, 411 fn7.

Since locomotives are not on-road mobile sources, placing them under the BIG Emissions – MDAB category is the technically correct location and does not constitute segmentation.

L17-27 See **Responses L17-24** and **L17-26**. The commenter is mistaken that emissions are segmented and that emissions were excluded.

L17-28 See **Responses L17-11** through **L17-19** concerning Section I. of this comment letter pertaining to the emissions inventory assumptions being based on substantial evidence such as the Market Benefits Report and Truck Miles Traveled analysis.

L17-29 See **Responses L17-11** through **L17-19** concerning substantial evidence explaining why beneficial cargo owners would choose to route containers by trains to BIG rather than trucks.

L17-30 The Draft EIR assumes that BIG would result in nationwide reductions in TMT, resulting in a net negative value for total GHG emissions. The comment contends that, if these assumptions were calculated incorrectly, BIG could have significant and adverse GHG-related impacts. As discussed in **Response L17-11** through **L17-19,** the Draft EIR's methodology is supported by substantial evidence. The TMT reductions are "reasoned predictions by experts on which the city is entitled to rely."[81, 82]

As noted in **Consolidated Response 13** concerning speculation without substantial evidence and requests for additional analysis and study, commenters are advised to support assertions that the lead agency should conduct additional analysis or review with data or other factual references. This is because the lead agency's CEQA conclusion must be based on substantial evidence in the record and not on speculation. Here, the commenter has not pointed to any facts or data that support its contention that the Draft EIR's analysis is flawed. The commenter offers a hypothetical narrative, describing potential impacts BIG may have if the GHG methodology were inaccurate. The commenter does not provide supporting factual information to substantiate that such deficiencies exist. (See Pub. Resources Code, § 21153, subd. (c).) [a public agency's "comments shall be supported by specific documentation."]) The comment therefore constitutes speculation, not substantial evidence. (Pub. Res. Code, §§ 21080(e)(2); 21082.2(c).) "[S]peculation is not enough" to support a challenge to an agency's analysis).[83, 84]

L17-31 The comment calls attention to a typographical error in **Draft EIR Section 5.8** (page 5.8-63). It is noted that the analysis mentions air quality and energy mitigation measures. Air quality and energy mitigation measures are applied in the Draft EIR to reduce GHG emissions to less than significant. Emissions reductions associated with air quality and energy mitigation measures are quantified and shown in **Draft EIR Table 5.8-12**: **BIG GHG Emissions** (page 5.8-61) (under the "Reductions from Mitigation Measures" heading. **Draft EIR Section 5.8** (page 5.8-63) has been revised as shown below and as shown in **Final EIR**

81 *City of Long Beach v. City of Los Angeles* (2018) 19 Cal.App.5th 465, 481.
82 *Save Round Valley Alliance v. County of Inyo* (2007) 157 Cal.App.4th 1437, 1467.
83 *County of Butte v. Department of Water Resources* (2023) 90 Cal.App.5th 147, 184.
84 *Newtown Preservation Society v. County of El Dorado* (2021) 65 Cal.App.5th 771, 789–790.

Section 3.0: Errata to the Draft EIR. These revisions are clarifying in nature and the Draft EIR conclusions remain valid.

> **Impact 5.8-1: BIG: Level of Significance Before Mitigation**: ~~Potentially~~ Less Than Significant Impact.
>
> **Impact 5.8-1**: **BIG Mitigation Measures:** ~~No mitigation required.~~ **MM BIG AQ-3** through **MM BIG AQ-5**, **MM BIG AQ-8** through **MM BIG AQ-10**, **MM BIG AQ-13**, **MM BIG AQ-14**, and **MM BIG EN-1** through **MM BIG EN-2**.
>
> **Impact 5.8-1: BIG Level of Significance After Mitigation:** ~~Less than significant impact would occur.~~ Less than Significant with Mitigation Incorporated.

L17-32 See **Responses L17-24** through **L17-31, Consolidated Response 05** concerning feasible and enforceable mitigation and **Consolidated Response 05-06** concerning the feasibility of specific technology and other mitigation measures. Regarding baseline truck miles traveled ("TMT") calculations, **Appendix C: Truck Miles Traveled Calculations** to **Draft EIR Appendix 5.15 BIG-1 CEQA Assessment – Transportation Analysis** discusses the underlying assumptions of the baseline TMT calculations for each of the truck moves involved in TMT calculations in the Draft EIR. Regarding future market behavior and nationwide trucking trends, and the BIG assumptions are based on substantial evidence, see **Responses L17-11** through **L17-19**. This comment provides concluding remarks related to the above comments. No additional response is required.

L17-33 CEQA allows for use of a future conditions baseline in lieu of an existing conditions baseline when existing conditions would be misleading or without informative value. State CEQA Guidelines § 15125(a)(2). A future conditions baseline must be justified by substantial evidence.

The California Supreme Court has confirmed that a future conditions baseline can be used in an analogous case where baseline conditions were based on traffic. In *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013), the Court affirmed that a lead agency may rely exclusively on a future conditions baseline when substantial evidence shows that using existing conditions would be misleading or without informational value, particularly for projects whose effects would occur in a later operational year under materially different non project conditions.[85] The Court explained that while existing conditions are the usual baseline, CEQA does not impose a rigid one size baseline; the question is whether the chosen baseline "promotes public participation and informed decision-making."[31]

In adjusting the existing conditions baseline to account for fluctuating circumstances, the lead agency "exercises its discretion on how best to define such a baseline under the circumstance

[85] *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439, 453–455.

of rapidly changing environmental conditions."[86] There is no "uniform, inflexible rule for determination of the existing conditions baseline."[87]

More recent decisions uphold future conditions baselines where operations begin in a future year and non-project growth, regulations, or infrastructure would change background conditions.[88,89] A future conditions baseline is particularly appropriate for measuring basin wide criteria pollutants in a No- BIG scenario.

The Draft EIR analyzes a BIG facility that initiates operations in future analysis years and whose regional (Basin-wide) air quality effects depend on non-project factors that would materially change before and during BIG's operating horizon. Substantial evidence in the record demonstrates:

1. Timing of Effects. The Basin-wide emissions changes from freight re-routing and mode shifts occur beginning in BIG's opening year and subsequent future years, not at the NOP date (see **Draft EIR Section 5.3 Table 5.3-23: Unmitigated Operational Emissions Within MDAB (pounds per day)** to **Table 5.3 26: Mitigated Operational Emissions within MDAB (pounds per day)** (pages 5.3-89 to 5.3-101)).
2. Regional Growth and Activity Forecasts. Adopted SCAG, SBCTA/SBTAM+, and California Department of Finance plans for Barstow project significant non-project growth in population, households, employment, and associated VMT and goods movement prior to and during BIG's operation years. These growth trajectories are embedded in the No Project transportation and emissions forecasts used by the **Draft EIR** (see **Draft EIR Section 5.15** (page 5.15-27), **Section 5.13 Table 5.13-3: Buildout Under 2015 General Plan Compared to Proposed General Plan Area Projections Table** (page 5.13-13) and **Table 5.13-7: Forecast Population – County of San Bernardino** (page 5.13-25); State CEQA Guidelines §15125(a) [use of projected future conditions/authoritative forecasts]).
3. Regulatory Turnover. Independent of BIG, fleet turnover and state regulations (e.g., successively more stringent on road engine standards, drayage requirements, locomotive in use controls and idle restrictions, cargo handling equipment electrification, fuel standards) would change emission rates per unit of activity between the NOP date and the analysis years (see Draft EIR regulatory setting in **Draft EIR Section 5.3.2** and CARB regulations summarized in **Section 5.3.2.2**).
4. Network/Operational Configuration. The rail and highway network, terminal capacities, and logistics practices that determine regional routing would not be the same as of the NOP; they would reflect future facilities and constraints considered in the regional No Project.

Given these facts, an existing conditions Basin-wide emissions inventory would not describe the conditions under which BIG's Basin level effects would actually occur. Such an approach

[86] *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439.
[87] *Id*. at 453.
[88] *North Coast Rivers Alliance v. Kawamura* (2015) 243 Cal.App.4th 647, 672–674 [future conditions baseline proper where project effects occur after intervening regulatory changes].
[89] *Save Our Capitol! v. DGS* (2021) 73 Cal.App.5th 693, 712–714 [agency has discretion to select baseline supported by substantial evidence].

would combine current emission factors and trip tables with future-year project activity, which would not accurately characterize future conditions. As a result, relying solely on existing conditions for this regional metric would provide limited insight into anticipated future air quality outcomes to decisionmakers and the public. It also should be noted that the commenter states in **Response L17-34** that 2028 conditions are a proxy for existing conditions.

The Draft EIR's Approach is Conservative and Informative

The Draft EIR uses future No Project and future With Project conditions for Basin-wide criteria pollutants, which is the appropriate comparative frame to isolate BIG's incremental change in the years BIG actually operates (see State CEQA Guidelines §§15125(a), 15126.2(a), 15144; Smart Rail, 57 Cal.4th at 454–456.)

At the project level, the Draft EIR separately quantifies on-site and near site sources (locomotives, trucks, CHE, energy, employee trips) using standard air district methods to determine significance today's decisions would control, including enforceable mitigation and performance standards. This dual approach ensures the Draft EIR is not fragmented, and that both local and regional effects are disclosed with methods appropriate to their timeframes and mechanisms.

Far from obscuring impacts, the future year baseline analysis incorporates higher background activity from regional growth (No Project conditions) while also reflecting declining emission rates from fleet turnover—both non project dynamics. This presents an accurate picture of BIG's impacts (i.e., what decisionmakers need to know: BIG's net change against the best forecasted future baseline (see State CEQA Guidelines § 15144).[90] For BIG, the regional emissions effect is not a near term, pre-operation effect; it occurs in future operational years. Relying on an existing-conditions baseline for this analysis would not meaningfully characterize BIG's anticipated regional emissions effects. Making use of a future conditions baseline appropriate and use of an existing conditions baseline inherently misleading and uninformative.

Finally, commenter acknowledges that existing conditions can be discerned from the Draft EIR and that relying on an existing conditions baseline would be misleading. See **Response L17-34** for more on this**.**

See **Response O21-60** for discussion on substantial evidence supporting use of future train traffic volumes for future baseline conditions.

L17-34 See **Response L17-33** for discussion regarding use of a future conditions baseline.

2023 emissions were not used in the analysis and thus, were not presented in the CEM Memo. However, SCAQMD's own comments demonstrate that it and the public can utilize 2028 emissions as a "proxy" for existing conditions. The Draft EIR includes 2028 emissions under No Project conditions, which is based on actual 2023 conditions with a growth rate applied [see

[90] *Cleveland National Forest Foundation v. SANDAG* (2017) 3 Cal.5th 497, 511–513 [agencies may rely on long term forecasts where supported and disclose assumptions].

CEM Errata, Appendix B, pages 74-80]. As commenter notes, conditions in 2023 are not substantially different from those in 2028, which are presented in the Draft EIR. Commenter also acknowledges that BIG's dedicated Tier 4 fleet improves conditions in the SCAB when compared to not building BIG which represents a real world disclosure of BIG's impacts throughout the life of the project. This underscores that the use of a future conditions baselines is informative and relying on existing conditions baseline is misleading as described in **Response L17-33**.

The Tier 4 Dedicated Fleet would be a binding and enforceable commitment, as explained in **Consolidated Response 12-03** concerning enforceability of the Project components and mitigation measures for the Project. Thus, the Dedicated Fleet, related assumptions, and the associated emissions reductions are supported by substantial evidence and are not speculative.

L17-35 Existing or future conditions baselines are utilized in the Draft EIR depending on which most accurately capture impacts.

Proposed General Plan

The proposed General Plan analysis (**Draft EIR Table 5.8-9: Existing Proposed General Plan Area -GHG Emissions Inventory** (page 5.8-51)) uses existing conditions (2023) as the environmental baseline for evaluating GHG impacts. The proposed General Plan impacts represent emissions associated with the existing land uses within the proposed General Plan area. The proposed General Plan analysis (**Draft EIR Table 5.8-10: Horizon Year 2048 Proposed General Plan Area GHG Emissions Forecast** (pages 5.8-56 through 5.8-58)) shows the change in emissions between the emissions under the proposed General Plan (2048) and existing conditions (2023). In this analysis, the Draft EIR evaluates whether the City can meet AB 1279-equivalent target for 2048 (48,917 $MTCO_2e$/year) when compared to its 2023 baseline emissions. The existing conditions baseline is used to pointedly assess the proposed General Plan consistency with State climate policy.

BIG – Corridor

For the rail corridor analyses, the Draft EIR utilizes a future conditions baseline to reflect actual impacts from BIG compared to No BIG. The BIG analysis years correspond to the implementation schedule for BIG (i.e., 2028 – Opening Year, 2033 – Initial Ramp Up Period, 2048 –Horizon Year).[91] These rail corridor analyses are intended to show BIG's effect over time as it becomes operational and as freight volumes change. The City is required under CEQA to disclose reasonably foreseeable future impacts for long-term infrastructure projects. The Draft EIR's approach aligns with State CEQA Guidelines §§15064 and 15126, which require analysis of long-term operational impacts where the project would unfold over multiple decades. See **Responses L17-33**, **L17-34**, and **O21-83** for discussions concerning use of a future conditions baseline.

[91] Draft EIR Section 5.8: Greenhouse Gas Emissions Table 5.8G, Table 5.8I, Table 5.8B, Table 5.8, Table 5.8e, Table 5.8h, Table 5.8-12 (page 5.8-61).

BIG – Project Footprint

For the BIG footprint's impacts analyses, the Draft EIR conservatively assumes a "zero" baseline, i.e., the analyses do not subtract any baseline for GHGs, criteria pollutants and TACs. As stated in **Draft EIR Section 5.8.3**, the BIG footprint largely consists of vacated land following property acquisition, meaning its operational baseline is effectively zero. All comparisons in **Draft EIR Table 5.8-12: BIG GHG Emissions** (page 5.8-61) are therefore relative to the No Project condition.

Each of the three baselines utilized best demonstrates GHG, criteria pollutant, and TAC impacts from the proposed General Plan and BIG, in keeping with CEQA's requirement that baselines present an accurate picture of impacts.

L17-36 See **Responses L17-33** and **L17-34**. Consistent with State CEQA Guidelines § 15125(a) and Neighbors for Smart Rail v. Exposition Metro Line Construction Authority (2013), the Draft EIR evaluates Basin-wide criteria pollutants using a future No Project baseline because BIG's Basin level effects occur only in future operational years under conditions that would materially differ from the NOP date due to regional growth, regulatory fleet turnover, and network changes.[92] Using an existing conditions regional baseline for this analysis would not meaningfully characterize BIG's anticipated regional emissions effects and would provide limited informational value for impacts that manifest only in future years. The Draft EIR is the most informative disclosure to the decisionmakers. This approach satisfies Guidelines §§ 15125(a), 15126.2(a), and 15144, comports with CBE (48 Cal.4th at 321–322), and is squarely supported by Smart Rail.

L17-37 See **Responses L17-18** and **Consolidated Response 12-03** concerning enforceability of the Project components and mitigation measures for the Project, which demonstrates that the Tier 4 dedicated fleet is a binding and enforceable commitment. See **Consolidated Response 05** concerning feasible and enforceable mitigation.

L17-38 See **Consolidated Response 05** concerning feasible and enforceable mitigation including applicable legal standards and **Consolidated Response 05-06** concerning the feasibility of specific technology (e.g., specific zero-emission technologies raised by commenter) and other mitigation measures.

Regarding requests that BNSF periodically reassess the state of ZE locomotive technology for inclusion at a later date, demonstration or "test" programs are not appropriate mitigation measures under CEQA to determine whether a measure may become feasible at some point in the future.[93] A ZE locomotive test program years or decades down the line is not an appropriate or feasible mitigation measure under CEQA as it speculative whether it can be completed within a "reasonable period of time." Cal. Code Regs. Tit. 14, § 15364.

BIG does include, as an enforceable and binding commitment (see **Consolidated Response 05-06** concerning the feasibility of specific technology and other mitigation

[92] *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439, 453–456.
[93] *Natural Resources Defense Council, Inc. v. City of Los Angeles* (2023) 98 Cal.App.5th 1176, 1205–07.

measures), a dedicated fleet of newly purchased Tier 4 locomotives on the rail corridor between the Ports and BIG, which are commercially available today, meet the most stringent U.S. EPA emissions standards for freight locomotives, and offer an immediate, proven, and reliable path to substantial emissions reductions while the industry continues advancing ZE locomotive technology.

L17-39 See **Consolidated Response 05** concerning feasible mitigation and the "reasonable period of time" standard.

L17-40 See **Consolidated Response 05** concerning feasible and enforceable mitigation. These **Consolidated Responses** demonstrate that BEL line hauls, BEL switchers and hybrid line haul configurations are not capable of being successfully accomplished within a reasonable period of time. The BEL and Catenary Feasibility Report documents that BEL and hybrid locomotives are not commercially ready, and implementing a hybrid consist would substantially reduce a train's total traction power. Even the Commenter notes that ZE or hybrid linehaul consists "may become feasible" by 2035, seven years after BIG becomes operational, and actual feasibility may not be reached for many years after due to the challenges noted in the *BEL and Feasibility Report*, *Power Swapping Memorandum*, *BEL Economic Feasibility Memorandum*, *Benchmark Report*, and *Zero-Emission Impacts on BIG's Viability*, which collectively present substantial evidence that BEL and hybrid consists are not commercially available and, with the current state of technology, present multiple operational challenges to implementation. Because commercially available hybrids have low power capacity, their zero-emission functions are limited. In practice, including hybrid linehauls in diesel-hybrid consists (as would be required operationally), would require smaller trains or more locomotives in total. Also see **Consolidated Response 05-06** concerning the feasibility of specific technology (e.g., specific hybrid locomotive technologies raised by commenter) and other mitigation measures.

BIG incorporates electric equipment where feasible while foregoing the inclusion of other electric equipment deemed infeasible for the Project. BNSF is not opposed to including electric equipment where feasible. Indeed, BNSF has a history of implementing programs to test electric equipment feasibility. Through California's Zero-Emission and Near Zero-Emission Freight Facilities (ZANZEFF) program, BNSF has secured funding to support the deployment of zero-emission and near-zero-emission freight technologies at rail facilities serving major goods movement corridors. Of the $45 million grant, BNSF and its partners contributed $22.6 million. Under the program, BNSF participated in a multi-equipment demonstration that included a battery-electric locomotive as well as zero- and near-zero-emission cargo-handling equipment such as rubber-tired gantry cranes, hostlers, and side loaders. The demonstration evaluated technical integration, charging requirements, and basic operational performance of zero-emission technologies within an active intermodal rail environment to complete a near-zero-emission goods movement pathway. These investments are intended to reduce diesel particulate matter, criteria pollutants, and GHG emissions from rail yard operations while advancing the commercial readiness of zero-emission freight equipment.

Separately, BNSF has implemented zero-emission hostler conversion projects at its South Seattle facility, replacing conventional diesel-powered hostlers with battery-electric alternatives through public funding partnerships. These projects demonstrate BNSF's active transition away from diesel-powered yard equipment and its policy in favor of providing operational experience with zero-emission technologies in active freight rail environments. The emissions reductions achieved through these conversions directly support CAPTI's emphasis on mitigating environmental justice impacts in communities adjacent to freight infrastructure.

In addition, BNSF has installed charging equipment and supporting electrical infrastructure at its San Bernardino and Hobart facilities to enable and service battery-electric hostlers operated by third-party partners. These infrastructure investments are a critical component of enabling zero-emission freight operations, ensuring that electric cargo-handling equipment can be reliably deployed and integrated into high-throughput intermodal facilities. By investing in shared charging and electrical infrastructure, BNSF is supporting broader adoption of zero-emission freight equipment consistent with CAPTI's call for multimodal design and planning on freight corridors.

These previous funded projects demonstrate that BNSF implements electric equipment to test feasibility where appropriate. However, as demonstrated in **Consolidated Response 05-06**, concerning the feasibility of specific technology and other mitigation measures, measures noted by commenters were deemed infeasible based on "specific economic, legal, social, technological, or other considerations" supported by substantial evidence in the record (State CEQA Guidelines §§ 15091(a)(3), 15091(b)) and thus were not implemented as mitigation measures for BIG.

Additionally, BNSF has entered into a Memorandum of Understanding with MDAQMD to implement a demonstration program testing five hybrid diesel electric linehaul locomotives that consume less fuel and generate lower emissions than traditional diesel locomotives during mainline operations, to determine if hybrid locomotives could become feasible. These locomotives also have the ability to operate in zero emissions mode when near BIG or at the BIG rail yard. However, given it is unknown and thus speculative whether the demonstration program would be accomplished and would reduce impacts, the demonstration program is not mitigation under CEQA and the Draft EIR did not take credit for these emissions reductions. Additionally, BNSF has entered into a Memorandum of Understanding to engage in good faith with CARB to explore currently infeasible technologies and other methods that could potentially further reduce emissions. The CARB Memorandum of Understanding is not mitigation under CEQA and the Draft EIR does not take credit for potential emissions reductions. As noted in the *Governor's Certification for Judicial Streamlining of the Barstow International Gateway Project in the County of San Bernardino*[94], "The Project Applicant has entered into a Memorandum of Understanding (MOU) with [MDAQMD] executed on February 23, 2026…and with [CARB] executed April 23, 2026… to implement a demonstration project of hybrid battery electric locomotive technology ("Pilot") as part of the Project." Thus,

[94] Submitted into the administrative record to the City on May 1, 2026.

the Draft EIR carefully considered emission-reducing measures and implemented all feasible mitigation measures.

L17-41 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 05-06** concerning the feasibility of specific technology and other mitigation measures, and **Consolidated Response 17** concerning the health impact analysis. Notably, the Mojave Desert Air Quality Management District found that the Draft EIR "includ[es] the use of all feasible mitigation." (MDAQMD, December 10, 2025, "MDAQMD Comments on the BNSF BIG Project Draft EIR," Comment L3-5.)

L17-42 See **Response S6-15** regarding battery tender cars. Funding is not the sole issue for infeasibility of this measure. As noted in the response, while battery tender cars are the subject of active study as a future option for partial or discontinuous electrification, their use at the scale and duty cycle of the BIG is not technically or operationally feasible within a reasonable period of time. See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 05-06** concerning the feasibility of specific technology and other mitigation measures, and **Consolidated Response 05-03** concerning a reasonable period of time for mitigation measures.

L17-43 See **Response S6-13** and **Response L17-38, as well as Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 05-06** concerning the feasibility of specific technology and other mitigation measures, and **Consolidated Response 05-03** concerning a reasonable period of time for mitigation measures.

Suggested zero-emission mitigation measures such as BEL locomotives, BEL switchers, ZE/NZE trucks, and eRTGs were deemed infeasible not only because it would take 7-10 years to get additional power to the site, but also because the technologies were deemed operationally, technologically, and practically infeasible within a reasonable period of time. See **Consolidated Response 05-06** concerning the feasibility of specific technology and other mitigation measures, *Feasibility Analysis of New Propulsion Locomotive Technologies and Overhead Catenary for the BIG Project,* Prepared by Michael E. Iden. P.E., dated March 2026 (*BEL and Catenary Feasibility Analysis*); and *A Power Plan for the Barstow International Gateway*, Burns & McDonnell, March 2026. Additionally, commenter compares the proposed mitigation measure to air district's 2037 attainment dates, but this is an inapt comparison. CEQA requires mitigation measures that can be reasonably completed within the Project's time horizon, rather than setting targets for an agency to achieve, as SCAQMD's attainment dates do.

L17-44 Spatial constraints were not the reason for rejecting truck charging infrastructure. As fully explained in **Consolidated Response 05-06**, concerning the feasibility of specific technology and other mitigation measures, imposing a ZE trucks requirement is infeasible. As the *Zero Emission Trucks Feasibility Evaluation for Barstow International Gateway*, Kimley Horn, et al., April 9, 2026 (*ZE Truck Feasibility Report*), finds "[d]ue to the technological limitations of ZE/NZE Truck technology and the high total cost of ownership compared to diesel Trucks, requiring customers to solely use ZE/NZE Trucks at BIG would create an untenable

disadvantage for BIG in a very competitive market." Imposing ZE/NZE truck requirements would impair BIG's ability to reduce regional truck trips by making it economically unviable for its customers. Regional truck trips would continue, as they do today, to one of BNSF's other IMFs in San Bernardino or Los Angeles, eliminating one of the emissions benefits of BIG. An industry level issue such as adoption of a brand new technology to reduce drayage truck emissions and modify goods movement, requires an industry-wide regulation and solution, not a requirement that singles out one project. Mandating ZE Trucks is thus infeasible, and CEQA does not mandate designing a facility for infeasible mitigation. See **Consolidated Response 05** concerning feasible and enforceable mitigation including applicable legal standards and **Consolidated Response 05-06** concerning the feasibility of specific technology (e.g., specific zero-emission technologies raised by commenter) and other mitigation measures.

L17-45 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 05-06** concerning the feasibility of specific technology and other mitigation measures, and **Consolidated Response 05-03** concerning a reasonable period of time for mitigation measures. Also see **Consolidated Response 11** concerning energy and power supply, the BEL and Catenary Feasibility Report, Operational and Economic Feasibility for BEL Switchers and Linehauls, and the Power Swapping Memorandum concerning economic and operational feasibility.

L17-46 The BIG facility does include space for potential future BEL charging infrastructure, but BEL line hauls and switchers are not commercially ready and otherwise not operationally and economically feasible within a reasonable period of time as fully described in **Consolidated Response 05-06** concerning the feasibility of specific technology (e.g., specific zero-emission technologies raised by commenter) and other mitigation measures**.** CEQA does not require infrastructure to accommodate infeasible technology, demonstrate infeasible mitigation, or phase in infeasible mitigation as set forth in **Consolidated Response 05**. Furthermore, as described in *A Power Plan for Barstow International Gateway* (Burns & McDonnell, March 2026) (Power Plan), BIG's peak power budget was derived by the following:

- **Use of Real-World Operating Data:** BNSF used operational data from BNSF's existing similar facilities to model load diversity (e.g., how many cranes simultaneously lift cargo).
- **Focus on Feasible Technology:** BNSF evaluated for use electrified equipment for the facility and incorporated all feasible technology as part of the Project, including zero-emission widespan cranes, forklifts, top picks/side loaders, and hostlers.

Other electrified technologies, including battery electric technology, were evaluated but were determined to be infeasible within a reasonable period of time for application for BIG for the reasons identified in the Power Plan. BIG's railyard design development required highly technical site assessment based on engineering, space utilization, and railroad operational and safety considerations. Because of the size and scale of facility, use of limited space for infeasible technology would be impractical. Even minor modifications to the design of BIG could have the potential for significant operational effects. Accordingly, it would not be

reasonable for BNSF from a business perspective to modify BIG's design to incorporate charging stations or Battery Energy Storage Systems (BESS) given the facility's peak demand does not indicate a need based on the feasibility evaluation.

Additionally, BNSF has entered into a Memorandum of Understanding with MDAQMD to implement a demonstration program testing five hybrid diesel electric linehaul locomotives that consume less fuel and generate lower emissions than traditional diesel locomotives during mainline operations, to determine if hybrid locomotives could become feasible. These locomotives also have the ability to operate in zero emissions mode when near BIG or at the BIG rail yard. However, given it is unknown and thus speculative whether the demonstration program would be accomplished and would reduce impacts, the demonstration program is not mitigation under CEQA and the Draft EIR did not take credit for these emissions reductions. Additionally, BNSF has entered into a Memorandum of Understanding to engage in good faith with CARB to explore currently infeasible technologies and other methods that could potentially further reduce emissions. The CARB Memorandum of Understanding is not mitigation under CEQA and the Draft EIR does not take credit for potential emissions reductions. As noted in the *Governor's Certification for Judicial Streamlining of the Barstow International Gateway Project in the County of San Bernardino*[95], "The Project Applicant has entered into a Memorandum of Understanding (MOU) with [MDAQMD] executed on February 23, 2026…and with [CARB] executed April 23, 2026… to implement a demonstration project of hybrid battery electric locomotive technology ("Pilot") as part of the Project." Thus, the Draft EIR carefully considered emission-reducing measures and implemented all feasible mitigation measures.

It is noted that the comment further states that "the Lead Agency is recommended to require BNSF to replace at least 10 percent of its fleet each year with ZE locomotive engines. CEQA requires mitigation only for significant environmental effects resulting from changes to the physical environment caused by the Project when compared to baseline conditions.[96] CEQA does not require a project to reduce, eliminate, or otherwise remediate background environmental conditions that exist independent of the Project.[97] Thus, there is no nexus between BIG and BNSF's national fleet. Additionally, neither the City nor the state has legal authority to require BNSF to replace portions of its national fleet, as such a mandate would be preempted by the Interstate Commerce Commission Termination Act (ICCTA), which establishes that the Surface Transportation Board has exclusive jurisdiction transportation by rail carriers. Indeed, as described in the Draft EIR at page 5.3-12, CARB withdrew its request for a federal waiver to regulate emissions from locomotives.

L17-47 The lead agency considered feasible mitigation measures to both project-level and cumulative impacts. See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 05-06** concerning the feasibility of specific technology and other mitigation measures, **Consolidated Response 05-03** concerning a reasonable period of time

[95] Submitted into the administrative record to the City on May 1, 2026.
[96] *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439, 447–448.
[97] *Baird v. County of Contra Costa* (1995) 32 Cal.App.4th 1464, 1479–1480.

for mitigation measures, and **Consolidated Response 17** concerning the health impact analysis. In addition, the Health Impact Analysis (HIA) prepared by BlueScape Environmental provides quantitative, region-wide context regarding whether BIG's emissions, when considered cumulatively with regional background and growth sources, result in any meaningful or discernible public health effects. The HIA evaluates cumulative regional ozone- and PM2.5-related health outcomes using photochemical modeling and USEPA BenMAP-CE, consistent with SCAQMD's 2022 AQMP methodology, and therefore directly informs the cumulative impact discussion.

The cumulative analysis on **Draft EIR Section 5.6: Energy** (page 6-21) (as cited by the comment) conservatively concludes that CO and VOC are cumulatively considerable because these pollutants represent a net increase, while all other pollutants would have a net decrease (see **Draft EIR Section 5.3: Air Quality Table 5.3-25: Unmitigated Operational Emissions Within SCAB (pounds per day)** (page 5.3-94). The HIA further demonstrates that even when these incremental increases are added to existing and projected regional emissions inventories, the resulting changes in ambient ozone and PM2.5 concentrations are orders of magnitude below applicable Significant Impact Levels and are not statistically meaningful when compared to baseline regional conditions. The conclusion that these increases are cumulatively considerable is conservative because the emissions would remain far below SCAQMD's significance thresholds. Consistent with this conservative CEQA disclosure, the HIA quantified potential cumulative health endpoints and found that maximum Project-related changes in regional mortality, hospital admissions, emergency room visits, and other health outcomes represent far less than one one-thousandth of one percent of existing baseline incidence rates, demonstrating no perceptible or discernible cumulative health impact to regional populations, including along the Corridor. The SCAQMD's thresholds are expressly designed to address cumulative air quality conditions in the Basin, which is currently designated as a nonattainment area with respect to ozone and particulate matter CAAQS and NAAQS.

SCAQMD has long taken the position that because the South Coast Air Basin is in nonattainment for ozone and particulate matter, any project that exceeds SCAQMD's project-level mass emissions thresholds also results in a significant cumulative impact. This approach is rooted in the outdated CEQA Air Quality Handbook (1993), which states that SCAQMD's regional mass thresholds are designed to determine whether a project's emissions "are cumulatively considerable" based on the region's existing air quality conditions and attainment status (also see the SCAQMD's thresholds last updated in March 2023, which cites their 1993 CEQA Handbook).[98]

Because regional air quality standards are exceeded basin-wide, all positive emissions from new projects contribute incrementally to existing cumulative air quality problems. Therefore, if a project exceeds SCAQMD's mass emissions thresholds, it is considered to make a cumulatively considerable contribution to nonattainment pollutants. If a project does not exceed thresholds, its incremental contribution is considered less than cumulatively

[98] https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25.

considerable.[99] The significance thresholds are therefore part of a broader framework to ensure that new sources do not exacerbate cumulative regional air quality conditions. Therefore, although BIG's CO and VOC increases in the Basin are below the SCAQMD's thresholds, the Draft EIR's conclusion that these impacts are cumulatively considerable are conservative. As explained above, these impacts would not affect attainment in the Basin or exacerbate existing conditions.

Additionally, the Draft EIR notes that many of the mitigation measures designed to reduce Project-level significant impacts would also mitigate cumulative impacts. Section 6.6.3 describes how **MM BIG AQ-7** through **MM BIG AQ-14** would mitigate cumulative impacts from criteria pollutant impacts within the MDAB. **Consolidated Response 05** demonstrates there are no feasible additional mitigation measures for emissions in the SCAB for cumulative impacts, which are the only significant impacts found in the EIR and the SCAB and which were conservatively assumed as described above.

State CEQA Guidelines § 15130(c) states that "with some projects, the only feasible mitigation for cumulative impacts may involve the adoption of ordinances or regulations rather than the imposition of conditions on a project-by-project basis." The HIA provides additional substantial evidence supporting this principle by demonstrating that, even when Project emissions are evaluated in combination with regionally projected growth and background sources included in the SCAQMD 2022 Air Quality Management Plan, the resulting incremental changes in regional ozone and PM2.5 concentrations and related health outcomes are not statistically meaningful and are indistinguishable from baseline cumulative conditions. The HIA confirms that regional attainment planning and basin-wide regulatory programs, rather than project-specific Corridor controls, are the mechanisms by which cumulative air quality and health conditions are addressed, because Project-level contributions do not result in discernible incremental health effects when viewed in the context of adopted regional plans.

The State CEQA Guidelines further state that, "If the lead agency determines that a mitigation measure cannot be legally imposed, the measure need not be proposed or analyzed. Instead, an EIR may simply reference that fact and briefly explain the reasons underlying the lead agency's determination" Guidelines § 15126.4(a)(5).

The Final EIR is responsive in this manner, conservatively identifying cumulative impacts and considering, and analyzing whether additional mitigation measures are feasible. As described in the Final EIR, cumulative impacts and significant and unavoidable. The decision to retain a conservative cumulative significance conclusion, notwithstanding the HIA's findings of no meaningful cumulative health impacts, ensures full disclosure while remaining consistent with State CEQA Guidelines § 15130(b)(1), which allows reliance on adopted regional plans and projections, such as the SCAQMD 2022 AQMP, when assessing cumulative conditions.

[99] South Coast Air Quality Management District, *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*, 2003.

See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 05-06** concerning the feasibility of specific technology and other mitigation measures. See also **Response S6-15** concerning feasibility of battery tender systems. Regarding potential health impacts, see **Consolidated Response 17** concerning the HIA**,** which explains the HIA Report's finding that "Barstow residents and communities along the Corridor will not experience any meaningful or discernible individual or cumulative health impacts or health endpoint increases as a result of BIG construction or operations." Further, MDAQMD has stated that all feasible mitigation measures have been included in the Draft EIR.

L17-48 See **Consolidated Response 05** concerning feasible and enforceable mitigation including applicable legal standards and **Consolidated Response 05-06** concerning the feasibility of specific technology (e.g., specific zero-emission technologies raised by commenter) and other mitigation measures. See **Response S6-19** and **S6-20** regarding ZE Transport Refrigeration Units (TRUs).

Regarding the request to periodically review the state of technology and implement all feasible locomotives as they become available, see **Consolidated Response 05-03** concerning reasonable period of time for implementation of mitigation measures**.** Refer also to **Response L17-46**.

Additionally, BNSF has entered into a Memorandum of Understanding with MDAQMD to implement a demonstration program testing five hybrid diesel electric linehaul locomotives that consume less fuel and generate lower emissions than traditional diesel locomotives during mainline operations, to determine if hybrid locomotives could become feasible. These locomotives also have the ability to operate in zero emissions mode when near BIG or at the BIG rail yard. However, given it is unknown and thus speculative whether the demonstration program would be accomplished and would reduce impacts, the demonstration program is not mitigation under CEQA and the Draft EIR did not take credit for these emissions reductions. Additionally, BNSF has entered into a Memorandum of Understanding to engage in good faith with CARB to explore currently infeasible technologies and other methods that could potentially further reduce emissions. The CARB Memorandum of Understanding is not mitigation under CEQA and the Draft EIR does not take credit for potential emissions reductions. As noted in the *Governor's Certification for Judicial Streamlining of the Barstow International Gateway Project in the County of San Bernardino,*[100] "The Project Applicant has entered into a Memorandum of Understanding (MOU) with [MDAQMD] executed on February 23, 2026…and with [CARB] executed April 23, 2026… to implement a demonstration project of hybrid battery electric locomotive technology ("Pilot") as part of the Project". Thus, the Draft EIR carefully considered emission-reducing measures and implemented all feasible mitigation measures.

L17-49 In determining the contents of an EIR, a lead agency is entitled to rely on its own experts' opinions as to what studies and analysis are appropriate to evaluate impacts.[101] CEQA does not require a lead agency to conduct every recommended test and perform all recommended

[100] Submitted into the administrative record to the City on May 1, 2026.
[101] *Association of Irritated Residents v. County of Madera* (2003) 107 Cal.App.4th 1383, 1397.

research to evaluate the impacts of a proposed project.[102] See **Consolidated Response 13** regarding speculation without substantial evidence and requests for additional analysis and study.

The Draft EIR properly analyzes the health impacts of the Project by (1) "includ[ing] sufficient detail to enable those who did not participate in its preparation to understand and to consider meaningfully the issues the proposed project raises" and (2) by "mak[ing] a reasonable effort to substantively connect a project's air quality impacts to likely health consequences".[103]

As explained in the Draft EIR (see pages 5.3-115 through 5.3-120 and **Draft EIR Appendix 5.3 BIG-1, Parts 1-8: Air Quality Technical Report** [pages 127 through 132]), ozone is not emitted directly by the Project. Rather, ozone is a secondary pollutant formed through complex photochemical reactions involving NOx and VOC precursors, sunlight, meteorology, and regional background conditions. The Draft EIR evaluates BIG's emissions of ozone precursors (NOx and VOCs) against applicable regional mass-emissions thresholds, consistent with standard CEQA air quality practice. Where those thresholds are exceeded, the Draft EIR includes a health effects discussion to satisfy the informational requirements identified by the California Supreme Court in *Friant Ranch*. The Draft EIR contains sufficient detail to enable readers to understand the health impacts of ozone, and the concentrations at which those impacts are expected. (see, e.g., Draft EIR, 5.3-52, 55, 82, 115, 117 to 118). The Draft EIR describes state and federal nonattainment standards for ozone and provides baseline ozone concentrations in the project area between 2021 and 2024. (Draft EIR pages 5.3- 55, 115, 117 to 118). Against this baseline, the Draft EIR explains that "BIG's contribution to regional O3 levels would be relatively small." (Draft EIR pages 5.3- 55, 115, 117 to 118).

The Draft EIR thus makes a "reasonable effort to substantively connect a project's air quality impacts to likely health consequences," identifies where existing scientific constraints prevent further translation of potential health impacts, and describes the nature and magnitude of impacts. (Draft EIR pages 5.3-59 to 61, 115 to 120, 124 to 161) The Draft EIR's discussion of health effects provides a reasonable effort to substantively connect BIG's air quality impacts to likely health consequences and describes the nature and magnitude of the adverse effect.[104] Additional regional-scale modeling would require detailed complicated modeling, but would not provide additional meaningful detail on health effects (Draft EIR pages 5.3-82 to 83). Therefore, the Draft EIR includes a thorough, science-based health impact analysis of health impacts, and it would not be required or meaningful to additionally include a separate, project-level Health Impact Analysis ("HIA").

Additionally, ozone-related health impacts are driven by population exposure, not emissions alone. Regional health burdens from ozone are greatest in densely populated urban areas, where large numbers of people are exposed to elevated concentrations over time. BIG's emissions occur in a sparsely populated area of the Mojave Desert, away from major population centers. As a result, the potential for meaningful ozone-related public health

[102] *Association of Irritated Residents v. County of Madera* (2003) 107 Cal.App.4th 1383, 1396.
[103] Sierra Club v County of Fresno (2018) 6 Cal.5th 502.
[104] *Friant Ranch v. San Joaquin Valley Unified Air Pollution Control District* (2018) 6 Cal.5th 502.

impacts attributable to BIG is inherently limited by low population exposure near the Project site. Any incremental contribution to regional ozone formation would be diffuse and distributed across a broad air basin, further reducing the ability to associate BIG emissions with localized health outcomes. This population-based understanding of health effects is consistent with regulatory practice and the scientific literature relied upon in the Draft EIR.

The Draft EIR explains that BIG's emissions represent a small fraction of regional precursor inventories, well below the resolution at which ozone concentration changes could be distinguished from background variability and model uncertainty.

Nonetheless, an HIA was conducted for BIG as discussed in **Consolidated Response 17** and submitted into the record. The HIA is available on the City website at: https://www.barstowca.org/departments/community-development-department/planning/barstowgeneralplanupdate-com/documents-for-public-review-download-ver1.

The HIA concluded that project-related changes in regional O_3 and $PM_{2.5}$ concentrations are small and spatially diffuse when evaluated at the regional scale. The analysis also identified that regional air quality and health outcomes are dominated by existing background concentrations and cumulative emissions from numerous sources, including mobile sources and other industrial and transportation activities throughout the basin. BIG's emissions represent a small fraction of the total regional precursor inventory, which constrains the ability to isolate or attribute specific regional health outcomes to BIG alone. Based on the HIA analysis, BIG is not expected to result in any meaningful impact greater than zero. See **Consolidated Response 17,** which explains the HIA Report's finding that "Barstow residents and communities along the Corridor will not experience any meaningful or discernible individual or cumulative health impacts or health endpoint increases as a result of BIG construction or operations."

Refer also to **Response O21-48**.

L17-50 As noted in **Consolidated Response 08-01**, the effects of BIG's increased rail activity concerning traffic delays and queueing at nine at-grade rail crossings were analyzed in a technical memorandum, *At-Grade Crossing Evaluation*. Since vehicular delay is not considered a potentially significant impact on the environment under CEQA, At-Grade Crossing Evaluation was conducted outside the CEQA significance framework. State CEQA Guidelines § 15064.3. As noted in the *At-Grade Crossing Evaluation* and Draft EIR, BIG proposes to add approximately 3 trains per day in Opening Year 2028 and 5 trains per day in Horizon Year 2048 over No BIG Baseline conditions. With this increase, the nine rail crossings studied are forecast to experience between 30 and 470 minutes of additional total vehicle delay per day, compared to No BIG Baseline conditions. The average delay per vehicle during a 24-hour period is estimated to increase by less than 3 seconds per vehicle at all nine crossings, compared to No BIG Baseline conditions. Further, all nine crossings are forecast to have an average delay per vehicle under 35 seconds (LOS C or better) under Plus BIG conditions.

The *At-Grade Crossing Evaluation* analyzes the effects of BIG's increased rail operations at a representative sample (i.e., 9 at-grade crossings) of the 48 total crossings along BNSF's rail

corridor from the Ports of Los Angeles and Long Beach to BIG. Motor vehicle delay at at-grade rail crossings results from intermittent closures associated with train movements and warning device activation. The Study compares vehicle delay at each of the nine crossings under No BIG Baseline and Plus BIG conditions; see *At-Grade Crossing Evaluation*, Table 1. During these delays, the vehicles are stopped and idling at the crossings. The methodology used to estimate the emissions from vehicle idling/delay at all 48 of the at-grade crossings is as follows:

- Estimated the average increase in delay per vehicle for the nine studied crossings
- Multiplied the average increase in delay per vehicle by the average daily trips (ADT) at each of the 48 affected at-grade crossings, to estimate the total daily increased idling at each of those 48 at-grade crossings. For instance, if the average increase in delay per vehicle was 3 seconds, and the crossing had an ADT of 10,000, there would be 30,000 seconds of increase in idling per day at that crossing, which is equivalent to one vehicle idling for approximately 8.3 hours (30,000 seconds / 3,600 [seconds per hour] = 8.3 hours).
- Summed the total daily increase in idling at all 48 at-grade crossings
- Multiplied the total daily increase in idling by EMFAC average fleet emission factors to estimate the daily criteria pollutant and greenhouse gas emissions associated with increased idling at all at-grade crossings.

Tables 1 through 4 below show the associated criteria pollutant and greenhouse gas emissions due to delay/idling at all 48 at-grade crossings. As shown in Table 1 and Table 2, criteria pollutant emissions from increased idling across all 48 at-grade crossings would total less than one-half additional pound of any criteria pollutant per day in any single air basin or county, and less than one additional pound of any criteria pollutant per day for all three counties (and both air basins) combined. It is also noted that localized emissions at each individual at-grade crossing would be far less than the emissions shown in Table 1 and Table 2. Finally, given the particulate matter (PM) emissions are negligible (less than one hundredth of a pound per day), this incremental increase in PM emissions would not change the Draft EIR's analysis conclusion that criteria pollutant concentrations would be below applicable thresholds within the Corridor.

Table 1: 2028 Pounds per Day From Increased Idling

Location	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
South Coast Air Basin - Los Angeles County	0.0088	0.0229	0.3020	0.0007	0.0008	0.0008
South Coast Air Basin - Riverside County	0.0114	0.0666	0.4698	0.0009	0.0011	0.0010
South Coast Air Basin - San Bernardino County	0.0003	0.0033	0.0251	0.0000	0.0000	0.0000
Total South Coast Air Basin	**0.0205**	**0.0928**	**0.7969**	**0.0016**	**0.0020**	**0.0018**
Mojave Desert Air Basin - San Bernardino County	0.00014	0.0017	0.0128	6.4E-06	1.2E-05	1.1E-05
Total Mojave Desert Air Basin	**0.00014**	**0.0017**	**0.0128**	**6.4E-06**	**1.2E-05**	**1.1E-05**
Overall Total (Both Air Basins Combined)	***0.021***	***0.094***	***0.810***	***0.002***	***0.002***	***0.002***

Table 2: 2048 Pounds per Day From Increased Idling

Location	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
South Coast Air Basin - Los Angeles County	0.0062	0.0109	0.1537	0.0008	0.0004	0.0004
South Coast Air Basin - Riverside County	0.0061	0.0160	0.2266	0.0009	0.0005	0.0005
South Coast Air Basin - San Bernardino County	0.0001	0.0005	0.0089	0.0000	0.0000	0.0000
Total South Coast Air Basin	**0.0125**	**0.0275**	**0.3892**	**0.0017**	**0.0010**	**0.0009**
Mojave Desert Air Basin - San Bernardino County	7.0E-05	0.0003	0.0045	9.2E-06	5.6E-06	5.1E-06
Total Mojave Desert Air Basin	**7.0E-05**	**0.0003**	**0.0045**	**9.2E-06**	**5.6E-06**	**5.1E-06**
Overall Total (Both Air Basins Combined)	***0.013***	***0.028***	***0.394***	***0.002***	***0.001***	***0.001***

As shown in Table 3 and Table 4 below, greenhouse gas emissions from increased idling across all 48 at-grade crossings would total less than 40 tons per year for all three counties combined. As shown below, when considering BIG's total emissions estimated in the Draft EIR, BIG's net GHG emissions would still represent a substantial decrease, thus, would not exceed the conservative net-zero threshold utilized in the Draft EIR.

Table 3: 2028 Metric Tons per Year

Location	CO_2e
South Coast Air Basin - Los Angeles County	15.50
South Coast Air Basin - Riverside County	21.11
South Coast Air Basin - San Bernardino County	0.73
Total South Coast Air Basin	**37.33**
Mojave Desert Air Basin - San Bernardino County	0.37
Total Mojave Desert Air Basin	**0.37**
Total GHG Emissions from Idling	***37.70***
2028 BIG Emissions (Draft EIR Table 5.8-12)	*-65,575*
Net BIG Emissions, including from Idling	*-65,537*

Table 4: 2048 Metric Tons per Year

Location	CO_2e
South Coast Air Basin - Los Angeles County	13.53
South Coast Air Basin - Riverside County	17.04
South Coast Air Basin - San Bernardino County	0.46
Total South Coast Air Basin	**31.03**
Mojave Desert Air Basin - San Bernardino County	0.23
Total Mojave Desert Air Basin	**0.23**
Total GHG Emissions from Idling	***31.27***
2048 BIG Emissions (Draft EIR Table 5.8-12)	*-26,155*
Net BIG Emissions, including from Idling	*-26,124*

L17-51 Commenter cites a congestion study conducted by the Riverside County Transportation Commission to support the contention that emissions impacts are underestimated. However, that study contains county-wide congestion estimates, without smaller geographic differentiation. Considerable speculation would be required to extrapolate from that one

study and apply it to the BIG footprint and rail corridor for 2028, 2033, and 2048, which are the timeframes of analysis. There is no feasible manner to apply the county's congestion study to the BIG site or rail corridor. As noted in prior responses, CEQA does not require exhaustive or infeasible analyses.[105,106] There is also "no requirement that an EIR analyze speculative impacts."[107] See **Consolidated Response 13** concerning speculation without substantial evidence and requests for additional analysis and study.

L17-52 See **Response L17-51** concerning congestion and delay at BNSF at-grade crossings.

L17-53 See **Response L17-51** concerning the quantification of congestion and delay at BNSF at-grade crossings.

L17-54 See **Response L17-51** concerning emissions assumptions related to congestion and delay at BNSF at-grade crossings.

L17-55 See **Response L17-51** concerning transportation-related air quality impacts from congestion and delay at BNSF at-grade crossings.

L17-56 Commenter's requests to conduct "worst-case" sensitivity analyses for partial truck displacement, mixed locomotive fleets, and growth-driven throughput without truck displacement are not required by CEQA nor supported by evidence in the comment letter. The commenter does not identify a factual basis to support the assertion that deficiencies exist. (Pub. Resources Code, § 21153, subd. (c).) [a public agency's "comments shall be supported by specific documentation."]). As noted in **Consolidated Response 13** concerning speculation without substantial evidence and requests for additional analysis and study, commenters are advised to support assertions that the lead agency should conduct additional analysis or review with data or other factual references. This is because the lead agency's CEQA conclusion must be based on substantial evidence in the record and not speculation. Here, the commenter has not pointed to any facts or data that support its contention that the Draft EIR's analysis is flawed. Nonetheless, in addressing commenter's concerns, it is noted that CEQA requires study of foreseeable impacts, not "worst-case scenarios." (State CEQA Guidelines §§ 15064(d)(3), 15358(a)(2).) An environmental impact that is speculative or unlikely to occur, i.e., a worst-case scenario, is not reasonably foreseeable. State CEQA Guidelines § 15064(d)(3).

Courts have been clear that an EIR is not required to include analysis of worst-case scenarios.[108,109;110] A lead agency has the discretion to determine appropriate methodologies and assumptions and direct limited resources to most important areas of analysis.[111] See **Consolidated Response 13** concerning speculation without substantial evidence and requests for additional analysis and study.

[105] *Cleveland Nat'l Forest Found. v. San Diego Assn. of Governments* (2017) 3 Cal.5th 497, 503.
[106] *National Parks & Conserv. Ass'n v County of Riverside* (1999) 71 Cal.App.4th 1341, 1364.
[107] *Friends of the Eel River v. Sonoma County Water Agency* (2003) 108 Cal.App.4th 859, 876.
[108] *East Oakland Stadium Alliance v. City of Oakland* (2023) 89 Cal.App.5th 1226, 1252–1253.
[109] *League to Save Lake Tahoe Mountain Area Preservation Foundation v. County of Placer* (2022) 75 Cal.App.5th 63, 141.
[110] *High Sierra Rural Alliance v. County of Plumas* (2018) 29 Cal.App.5th 102, 122.
[111] *Placerville Historic Preservation League v. Judicial Council* (2017) 16 Cal.App.5th 187, 200.

Regarding truck displacement assumptions, the City's assessment is that the BIG truck displacement numbers in the Draft EIR are those best supported by evidence, including the **Draft EIR Appendix 5.15 BIG-1 – CEQA Assessment – Transportation Analysis** and **Draft EIR Appendix 5.3 BIG-1**, pages 75-76. The City does not find evidentiary support for "worst-case" scenarios with 25, 50, and 75 percent reductions in truck displacement. Such percentage reductions in truck displacement are speculative, arbitrarily chosen, and without evidentiary support. Where there have been disagreements between the lead agency and other parties regarding traffic projections, courts have found the EIR adequate and have not required lead agency to speculate further.[112] Disagreements with an EIR's impact analysis will be resolved in favor of the lead agency if there is any substantial evidence in the record supporting the approach used.[113] Refer also to **Response L17-30** regarding hypothetical, speculative and unsupported comments.

For more on partial truck displacement, see **Response L17-16.**

Regarding mixed locomotive fleets, the Tier 4 Dedicated Fleet will be a binding and enforceable commitment of newly purchased locomotives. See **Consolidated Response 05-06** concerning the feasibility of specific technology and other mitigation measures.

See also **Response L17-18** demonstrating BIG's project description is supported by substantial evidence.

L17-57 The Draft EIR was released for public review on November 13, 2025 (mobile source emissions modeling commenced even earlier) and used the latest data available at the time the analysis was conducted, including EMFAC2021 for construction-related on-road hauling and worker vehicle trips (Draft EIR pages 5.3-36, 5.8-42) and operation-related passenger cars and truck miles traveled ("TMT") (Draft EIR pages 5.3-39, 5.8-44, and5.8-45.) CARB's EMFAC2021 adjustment factors were approved[114] on November 21, 2025. CEQA requires that environmental analyses be supported by substantial evidence and prepared using the best information reasonably available at the time of analysis; it does not require perpetual updating to reflect every subsequent methodological or dataset revision that occurs after the draft analysis is completed (see State CEQA Guidelines §15151). As explained in **Draft EIR Section 5.3.3.2**, page 5.3-33:

> Mobile-source emissions from worker vehicle trips and truck trips were calculated using VMT and TMT (heavy-duty truck miles traveled) estimates and appropriate emission factors from CARB's EMFAC2021 model (v1.0.2). EMFAC2021 emissions projections assumed implementation of the ACT Regulation and the Heavy-Duty Low NO_X Omnibus Regulation. These regulations were disapproved by Congressional Resolutions H.J. Res 87 and H.J. Res 89, respectively. The resolutions were signed by the President on June 12, 2025. These resolutions, along with H.J. Res. 88 (revoking federal light-duty

[112] *Yerba Buena Neighborhood Consortium, LLC v. Regents of the Univ. of Cal.* (2023) 95 Cal.App.5th 779.
[113] *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 409.
[114] https://ww2.arb.ca.gov/sites/default/files/2025-12/EPA%20Off-Model%20Adjustment%20Factors%20Approval%20Letter.pdf.

> vehicle GHG standards), limit the ability of CARB to enforce these California regulations that had been authorized by U.S. EPA waivers under the FCAA. CARB is currently evaluating the impact of the actions (H.J. Res 87, H.J. Res 88, and H.J. Res 89) under the Congressional Review Act, but has not yet provided emissions modeling guidance. Accordingly, emissions from trucks are overestimated in the EMFAC2021 model.

The Draft EIR further explains on page 5.8-39:

> As noted above, EMFAC2021 emissions projections assumed implementation of the ACT Regulation and the Heavy-Duty Low NO_X Omnibus Regulation. These regulations were disapproved by Congressional Resolutions H.J. Res 87 and H.J. Res 89, respectively. Therefore, EMFAC2021 emission rates would be expected to increase without the ACT Regulation and the Heavy-Duty Low NO_X Omnibus Regulation. Overall, GHG emissions associated with BIG construction as set forth herein are overestimated. As the TMT reductions represent a net decrease in total BIG emissions, any emission rate increases would represent a greater emissions reduction than the emissions calculated in this analysis. Therefore, GHG emissions associated with BIG are overestimated.

Because the State has no authority to implement these regulations, the model overestimate emissions associated with TMT emissions in California and therefore GHG emissions associated with BIG, as a general matter, are overestimated in the Draft EIR. This results in a conservative underestimation in the TMT emission reduction used in the Draft EIR.

Because the Draft EIR assumes baseline emissions would decrease as they would have under the Advanced Clean Trucks program, BIG's projected reductions in TMT-related emissions would exceed the levels forecasted in the Draft EIR (see **Draft EIR Appendix 5.15 BIG-1**, Section 8.1 [Truck Miles Traveled], pages 130-145 [describing baseline TMT assumptions] and Draft EIR Section [Greenhouse Gas Emissions] and **Draft EIR Appendix 5.3 BIG-1** [Air Quality Analysis] (baseline emissions modeling assumes implementation of adopted CARB regulations, including the Advanced Clean Trucks program]). Thus, the Draft EIR overestimates, rather than underestimates, project-related emissions.

It is noted that in March 2026, although the congressional actions are being contested, EMFAC2025 v2.1.0 has been released to reflect the current regulatory conditions. This revision has been released well after the Draft EIR was released for public review on November 13, 2025. Additionally, EMFAC2025 has not yet been approved by U.S. EPA. Nonetheless, the Draft EIR's use of EMFAC2021 results in a conservative underestimation in the TMT emission reduction used in the Draft EIR.

Furthermore, CARB notes that the adjustment factors are solely for the purposes of State Implementation Plan (SIP) development and conformity determinations, including regional emissions analysis for transportation plan and transportation improvement program conformity determinations, as well as hot-spot analysis for project-level conformity

determinations. As such, CARB's EMFAC off-model adjustment factors do not apply to BIG's project-level emissions analysis.

L17-58 The comment introduces subsequent comments that assert three categories of inconsistency between **Draft EIR Appendix 5.15 BIG-1 CEQA Assessment – Transportation Analysis** and **Appendix 5.3 BIG-1 Air Quality Technical Report**: (1) truck displacement assumptions; (2) trip allocation and routing; and (3) forecast-year activity levels. As explained below, no inconsistency exists, and the two appendices are based on the same underlying truck-activity and train-activity inputs. The Air Quality Technical Report uses the CEQA Assessment – Transportation Analysis (located in **Draft EIR Appendix 5.15 BIG-1 CEQA Assessment – Transportation Analysis**) exactly as required for emissions modeling and applies appropriate spatial and regulatory scopes. See **Responses L17-59** through **L17-62** for detailed responses.

L17-59 As noted in **Consolidated Response 13** concerning speculation without substantial evidence and requests for additional analysis and study, commenters are advised to support assertions that the lead agency should conduct additional analysis or review with data or other factual references. This is because the lead agency's CEQA conclusion must be based on substantial evidence in the record and not speculation. Here, the commenter has not pointed to any facts or data that support its contention that the Draft EIR's analysis is flawed. Nonetheless, in addressing commenter's concerns, **Draft EIR Appendix 5.15 BIG-1 CEQA Assessment – Transportation Analysis** identifies, for each forecast year, the net reduction in truck trips and TMT due to BIG's mode shift from long-haul trucking to rail. These values appear in **Draft EIR Appendix 5.3 BIG-1 Air Quality Technical Report Table 19: Net Truck Trips and Truck Miles Traveled Reductions by BIG** (page 76), which reports the following, matching **Appendix 5.15 BIG-1 CEQA Assessment – Transportation Analysis Table 44** (page 145):

- Annual truck trips removed (Nationwide): 2028: –627,000; 2033: –829,220; 2048: –962,700
- Annual TMT reductions (Nationwide): 2028: –217,824,523 miles; 2033: –286,312,231 miles; 2048: –333,123,035 miles

These are identical to **Draft EIR Appendix 5.15 BIG-1 CEQA Assessment – Transportation Analysis Table 44** (page 145) and **Appendix 5.3 BIG-1 Air Quality Technical Report Table 19** (page 76), which also provide California-only and basin-specific TMT reductions (MDAB, SCAB), as these values are relevant for the air quality analysis. These values correspond to the reductions calculated in **Draft EIR Appendix 5.15 BIG-1**. **Appendix 5.3 BIG-1** uses these TA inputs without modification. The comment does not cite any specific locations where numbers are inconsistent and does not provide any evidence that the same foundational data is not used. Therefore, no further response is required.

L17-60 The comment suggests the Air Quality Technical Report in **Draft EIR Appendix 5.3 BIG-1** uses "composite haul distances" as well as different routing logic than the TA in **Appendix 5.15 BIG-1**. This is not correct. However, different models require different spatial scopes. For example, the TA allocates truck activity to roadway links for the purpose of traffic operations analysis (LOS, VMT, TMT by road segment). The Air Quality Technical Report, however, must

analyze emissions at three distinct geographic scales, which include MDAB on-road emissions, SCAB on-road emissions, and Statewide/nationwide corridor emissions

To perform CEQA-required emissions calculations, the Air Quality Technical Report translates CEQA Assessment - Transportation Analysis-provided TMT reductions into the appropriate regional and statewide EMFAC modeling domains. These are not different assumptions; they are the same truck trip reductions applied at different required geographic scales for emissions modeling.

Because emissions are calculated based on total TMT by region, and the TMT values themselves come directly from the CEQA Assessment - Transportation Analysis, the routing methodology used for traffic operations does not change. The CEQA Assessment - Transportation Analysis routing determines the TMT reductions. The Air Quality Technical Report's EMFAC inputs require only the regional totals, not the individual routes. Therefore, there is no inconsistency, and emissions estimates are not affected.

L17-61 The comment suggests that transportation and air quality modeling use different forecast-year assumptions; however, this does not reflect the assumptions used in the Draft EIR. Both **Draft EIR Appendix 5.15 BIG-1** and **Appendix 5.3 BIG-1** use Opening Year 2028, Interim Year 2033, and Horizon Year 2048. In addition, the comment does not cite any specific locations where different truck activity levels are applied or provide supporting evidence for this assertion.

As noted in **Consolidated Response 13** concerning speculation without substantial evidence and requests for additional analysis and study, commenters are advised to support assertions that the lead agency should conduct additional analysis or review with data or other factual references. This is because the lead agency's CEQA conclusion must be based on substantial evidence in the record and not speculation. Here, the commenter has not pointed to any facts or data that support its contention that the Draft EIR's analysis is flawed. Nonetheless, in addressing commenter's concerns, where numerical values may appear to differ, it is because the CEQA Assessment - Transportation Analysis and Air Quality Technical Report measure different things, not because they use different assumptions. For example, the CEQA Assessment - Transportation Analysis evaluates vehicle operations and roadway network performance, while the Air Quality Technical Report evaluates mass emissions, requiring locomotive activity (**Draft EIR Appendix 5.3 BIG-1 Table 16** (page 70) and **Table 17** (page 71)), cargo-handling equipment (**Draft EIR Appendix 5.3 BIG-1 Table 14** (page 66) and **Table 15** (page 67)), mobile sources using EMFAC emission factors and regionalized TMT (**Draft EIR Appendix 5.3 BIG-1 Table 19** (page 76)). These datasets must differ because they represent different activity and scales, not because they rely upon inconsistent assumptions.

L17-62 See **Responses L17-58** through **L17-61** The CEQA Assessment - Transportation Analysis (**Draft EIR Appendix 5.15 BIG-1**) and Air Quality Technical Report (**Draft EIR Appendix 5.3 BIG-1**) rely on the same foundational truck-activity, train-activity, and forecast-year data. **Draft EIR Appendix 5.3 BIG-1** explicitly incorporates the CEQA Assessment – Transportation Analysis truck trip reductions and TMT reductions (as demonstrated in **Draft EIR Appendix 5.3**

BIG-1 Table 19 (page 76), consistently uses the same forecast years (2028, 2033, 2048), and transparently allocates the CEQA Assessment - Transportation Analysis-provided TMT to the geographic modeling domains required under CEQA for emissions analysis. No inconsistencies exist, the analyses are analytically coherent, and thus, no revisions to the Draft EIR are necessary. In summary, the Air Quality Technical Report appropriately applies CEQA Assessment - Transportation Analysis inputs to calculate regional and corridor emissions in accordance with regulatory modeling requirements.

L17-63 The Draft EIR contains a comprehensive regulatory consistency analysis demonstrating that the proposed General Plan includes mitigation to support alignment with California's long-term climate goals; BIG results in net GHG reductions, even before state-mandated future fleet turnover; and future development within the City would benefit from implementation of statewide clean-transportation and clean-energy regulations. The Draft EIR's conclusions are supported by substantial evidence and fully comply with State CEQA Guidelines §§ 15064.4, 15125, 15126, and 15183.5.

Consistency with State GHG Reduction Targets

Draft EIR Section 5.8: Greenhouse Gas Emissions Table 5.8-10: Horizon Year 2048 Proposed General Plan Ares GHG Emissions Forecast (page 5.8-57) demonstrates how future emissions relate to the State's reduction targets. The Draft EIR acknowledges that additional reductions are required to fully achieve the 2045 statewide target and therefore identifies **MM GP-GHG-1** (Climate Action Plan) to ensure the City adopts enforceable, local GHG-reduction actions consistent with California's carbon-neutrality pathway. **MM GP-GHG-1** (page 5.8-58) requires the City to develop a Climate Action Plan within 36 months of EIR certification, including a GHG inventory, reduction measures, implementation schedule, monitoring program, and alignment with AB 1279's carbon-neutrality trajectory. This measure ensures long-term consistency with statewide climate objectives, consistent with State CEQA Guidelines § 15183.5 (GHG reduction plans).

Consistency with the California Sustainable Freight Action Plan

Draft EIR Section 5.8: Greenhouse Gas Emissions evaluates consistency with State freight and mobile-source decarbonization policies, including those that advance zero-emission freight equipment, ZEV infrastructure, and cleaner locomotives (pages 5.8-87 to 5.8-91). Many of these actions, including electric passenger vehicle charging infrastructure requirements, cleaner locomotive rules, renewable diesel adoption, and freight-system efficiency strategies, are reflected in both project-level mitigation (e.g., **MM BIG AQ-3** through **AQ-14**, **MM BIG EN-1**, **MM BIG EN-2**) and future statewide implementation.

Future development in the City would also benefit from mandatory statewide rules such as SB 100 (100 percent zero-carbon electricity), Title 24 building energy efficiency updates, and CARB mobile-source regulations that continue to drive down emissions. The Draft EIR discusses these statewide regulatory obligations at length (**Draft EIR Section 5.8.2** pages 5.8-7 to 5.8-31).

Cap-and-Trade

The comment suggests the Draft EIR "takes credit" for reductions attributable to Cap-and-Trade; however, this does not reflect the approach used in the Draft EIR. The Draft EIR discusses Cap-and-Trade and statewide programs only as regulatory context (Draft EIR page 5.8-91) and does not rely on Cap-and-Trade to determine project-level significance. Instead, BIG significance is determined using a zero net increase threshold (Draft EIR page 5.8-53), and the proposed General Plan significance determination is based on consistency with AB 1279's GHG-reduction trajectory, rather than Cap-and-Trade allowances (Draft EIR pages 5.8-52 to 5.8-56).

This complies with State CEQA Guidelines § 15064.4(b), which allows agencies to evaluate the extent to which a project complies with regulations adopted to reduce GHG emissions but requires significance determinations to be independent of non-project-specific reductions.

L17-64 The Draft EIR presents substantial evidence that BIG achieves net GHG reductions relative to the No Project baseline. **Draft EIR Table 5.8-12**: **BIG GHG Emissions** (pages 5.8-62 through 5.8-63) shows that the unmitigated BIG Project achieves a net reduction in GHG emissions. These reductions result from substantial decreases in national TMT due to rail mode shift; use of Tier 4 locomotives and elimination of existing Tier 0/1 switchers at the existing Barstow Railyard; electric cargo-handling equipment; increased renewable diesel use; and on-site solar generation at BIG.

These reductions directly support California's Sustainable Freight Action Plan and the State Rail Plan, both of which emphasize modal shift from trucks to rail, freight-yard electrification, and locomotive fleet cleanup. **Draft EIR Section 5.8** concludes BIG is "a net GHG-reduction project" (page 5.8-3).

The Draft EIR includes a dedicated regional-plan consistency analysis that addresses Connect SoCal (SCAG RTP/SCS goods movement strategy), California State Rail Plan, regional GHG-reduction targets, congestion reduction and freight-efficiency goals. **Draft EIR Section 5.8 Table 5.8-14: Connect SoCal 2020 Consistency - BIG** and **Table 5.8-15: Applicable Goals of Connect SoCal 202 - BIG** (pages 5.8-82 to 5.8-87) conclude that BIG advances goods movement efficiency; reduces heavy-duty truck traffic; increases rail capacity and reliability; supports regional freight-system resiliency; reduces GHG emissions and some criteria pollutants; and does not conflict with SCAG's long-term mobility or climate strategies. The State Rail Plan specifically identifies the need for expanded inland port and freight-rail infrastructure to relieve port-area congestion and improve statewide transportation system reliability. BIG directly advances these objectives (Draft EIR page 5.8-82).

L17-65 See **Response S6-19**. BIG does not include cold-storage or refrigerated warehouse uses, and no portion of the transload warehouse center is designed or entitled for temperature-controlled storage. Transport refrigeration units (TRUs) were included in the emissions modeling solely to conservatively account for potential incidental TRUs passing through the facility. No regular TRU activity is expected, and diesel TRU operations are not

required or supported by BIG's land uses. **MM BIG-AQ-14** does not authorize cold-storage activities; instead, it provides for future electrical capacity to minimize emissions from any unexpected TRU-equipped trailers that may arrive.

L17-66 This comment provides a general conclusion regarding the comments raised in this letter. Response to the comments contained in this letter are provided above. Written response comments would be provided pursuant to Public Resources Code § 21092.5(a) and State CEQA Guidelines § 15088(a-c).

COMMENT LETTER L18

THE PORT OF LOS ANGELES 425 S. Palos Verdes Street Post Office Box 151 San Pedro, CA 90733-0151 TEL 310-SEA-PORT portoflosangeles.org

Karen Bass, *Mayor, City of Los Angeles*

Board of Harbor Commissioners: Lucille Roybal-Allard, *President*; John A. Pérez, *Vice President*; Yolanda M. De La Torre, *Commissioner*; Edward R. Renwick, *Commissioner*; I. Lee Williams, *Commissioner*

Eugene D. Seroka, *Executive Director*

January 12, 2026

City of Barstow
Community Development Department
220 E. Mountain View Street
Barstow, CA 92311

RE: SUPPORT FOR BARSTOW INTERNATIONAL GATEWAY (BIG) PROJECT DRAFT EIR

To Whom It May Concern:

On behalf of the Port of Los Angeles, I write to express our strong support for the Barstow International Gateway (BIG) project, the proposed $4 billion master-planned rail facility in Barstow. L18-1

BIG is designed to provide an integrated rail yard, intermodal, and warehouse facility, which would allow the direct transfer of containers from ships to trains at the Port of Los Angeles for short-haul rail trips to Barstow for sorting and onward transport throughout the U.S. As noted in the recently released Draft Environmental Impact Report (EIR), BIG would enhance supply chain resiliency, efficiency, and cost-effective goods movement by rail and was identified in the 2024 adopted California State Rail Plan to help build toward an integrated statewide rail and transit network and investments in zero-emission infrastructure. L18-2

BIG is exactly the kind of private investment that we need here in California right now to support the efficient movement of goods. We encourage the City of Barstow to finalize the EIR and approve the project so that it can be built and start operations as soon as possible. L18-3

Thank you for your consideration of this matter. Please do not hesitate to contact me if you have any questions or require additional information. L18-4

Sincerely,

EUGENE D. SEROKA
Executive Director

EDS:DJL:ccr

RESPONSE TO COMMENT LETTER L18, PORT OF LOS ANGELES

L18-1 through L18-4 Thank you for your comment. See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER L19

Main Office - 825 East Third Street, San Bernardino, CA 92415-0835 | Phone: 909.387.7910 Fax: 909.387.7911

SAN BERNARDINO COUNTY

Department of Public Works
- Flood Control
- Operations
- Solid Waste Management
- Special Districts
- Surveyor
- Transportation

www.SBCounty.gov

Noel Castillo, P.E.
Director

Byanka Velasco, P.E.
Assistant Director

David Doublet, M.S., P.E.
Assistant Director

January 12, 2026

Transmitted Via Email
File: 10(ENV)-4.01

City of Barstow, Community Development
Attn: Chris Heldreth, Community Development Director
220 East Mountain View Street, Suite A
Barstow, CA 92311
generalplan@barstowca.org

RE: PROJECT COMMENT – NOTICE OF AVAILABILITY (NOA) FOR A DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR THE CITY OF BARSTOW PROPOSED GENERAL PLAN UPDATE AND BARSTOW INTERNATIONAL GATEWAY PROJECT (BIG).

Dear Mr. Heldreth:

Thank you for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. **We received this request on November 9, 2025,** and pursuant to our review, the following comments are provided: L19-1

Flood Control Planning/Water Resources/Operations Support Division (Michael Fam, Engineering Manager, (909) 387-8120):

The BIG Specific Plan proposes a rail yard consisting of an intermodal facility, a "block swap" yard and ancillary rail area, as well as a transload warehouse center and a private utility (i.e., solar farm), and an approximately 680-acre area at the northern boundary of the Specific Plan area that would remain ungraded, a portion of which is proposed to be placed under a conservation easement. L19-2

The proposed General Plan updates concern the City of Barstow and its Sphere of Influence (SOI), which are in western San Bernardino County and are surrounded by unincorporated San Bernardino County. The BIG facility is proposed to be located at the western side of the City, partly in incorporated City of Barstow and partly in an existing unincorporated portion of the County, which is proposed for concurrent annexation into the City, the Barstow Fire Protection District, and the Odessa Water District. L19-3

The Lenwood Channel (flood control channel) running through the proposed project area is owned and maintained by the San Bernardino County Flood Control District (District). The L19-4

BOARD OF SUPERVISORS
Col. Paul Cook (Ret.) Vice Chairman, First District | Jesse Armendarez Second District | Dawn Rowe Chair, Third District | Curt Hagman Fourth District | Joe Baca, Jr. Fifth District
Luther Snoke Chief Executive Officer

District's recommendations are most often made for site specific conditions, and we would appreciate the opportunity to provide comments when more information becomes available. L19-4 cont'd

We offer these comments:

1. According to the most recent Federal Emergency Management Agency (FEMA) Insurance Rate Map, Panel 06071C4508H, dated August 28, 2008; Panel 06071C4506H, dated August 28, 2008; Panel 06071C389SH, dated August 28, 2008; Panel 06071C4507H, dated August 28, 2008; Panel 06071C4509H, dated August 28, 2008; Panel 06071C4526H, dated August 28, 2008; and Panel 06071C3915J, dated September 2, 2016, portions of the project lies within the Special Flood Hazard Area Zone AE, AO, X and D. L19-5

2. We recommend that the project includes, and the City of Barstow enforce, the most recent FEMA regulations for development in a Special Flood Hazard Area. L19-6

3. The District's right-of-way and facilities are located within the proposed Project area. If proposing construction, any encroachments including, but not limited to, access for grading, fence/wall removal and installation, side drain connections, and utility crossings on the District's right-of-way or facilities will require a permit from the District prior to start of construction. Please contact the San Bernardino County Flood Control Permit Section at (909) 387-7995 for further information regarding this process.

Permits/Operations Support Division (David Belicki, P.E., Engineering Manager, (909) 387-7995): L19-7

The proposed Project sites fall within the County Maintained Road System (CMRS). Transportation permits will be required if proposing construction in County Road Right-of-Way. If you have any questions regarding this process, please contact the District's Permit Section at (909) 387-7995. The following website will show you which roads are in the CMRS. The roads highlighted in yellow are CMRS roads and will require a road permit from the County of San Bernardino Department of Public Works: http://sbcountydpw.maps.arcgis.com/home/webmap/viewer.html?webmap=5061d5716d534bf592e14afbaaf68a7a

4. A Road Construction Permit will be required if any public road improvements are proposed within any CMRS. A Street Improvement Plan (SIP) permit may be required as a condition of approval for the Road Construction Permit. L19-8

5. An Excavation Permit will be required if any public off-site utility work such as sewer, water, gas, electricity, telephone/television cable, etc. that involves trenching or boring are proposed within any CMRS. L19-9

6. An Encroachment Permit will be required if conditions require a tie into an existing utility that falls within the CMRS roads. L19-10

Transportation Design (Wilfried P. Niemann, P.E., T.E., Supervising Engineer, (909) 387-7958)

L19-10 cont'd

The BIG Specific Plan is located partly in incorporated Barstow and the unincorporated County to which the proposed General Plan update proposes concurrent annexation to the City of Barstow.

7. Ownership and responsibility of the existing roads within the CMRS within the Barstow Sphere of Influence plus Traffic Analysis Zones or that within the Specific Plan area, will be accepted by the City of Barstow congruently with adoption/approval of the project exists. L19-11

8. Assuming incorporation and acceptance of existing CMRS within the aforementioned limits, San Bernardino County Local Agency Formation Commission (LAFCO) environmental process and procedures to be addressed in unison/concurrently. L19-12

9. Please contact the San Bernardino County Department of Public Works Traffic Division at (909) 387-8168 for works on: adjoining roads/routes such as the Truck Haul Route within the CMRS; street capacity/signalization; geometric layout/configuration; roadway realignment and intersection modifications/closures; and emergency access routes. L19-13

10. Please contact the San Bernardino County Department of Public Works Transportation Planning/Pavement Management at (909) 387-8165 pertaining to adjoining roads/routes within the CMRS – pavement structural integrity/section. L19-14

We respectfully request to be included on the circulation list for all project notices, public reviews, or public hearings. In closing, I would like to thank you again for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. Should you have any questions or need additional clarification, please directly contact the individuals providing the specific comment, as listed above. L19-15

Sincerely,

Nancy Sansonetti

Nancy J. Sansonetti, AICP
Supervising Planner, Capital Improvement Section
Environmental Management Division

NJS:MC:xx

Cc: Manie Cruz, Planner III

RESPONSE TO COMMENT LETTER L19, SAN BERNARDINO COUNTY DEPARTMENT OF PUBLIC WORKS

The City acknowledges the County of San Bernardino's role as a Responsible Agency and its ability to exercise its own judgment regarding the Final EIR's adequacy in accordance with State CEQA Guidelines § 15096(e). A discussion related to the County of San Bernardino's jurisdiction relevant to BIG is included in **Draft EIR Section 3.0: Project Description** and **Draft EIR Sections 5.1** through **5.17**, as appropriate. The anticipated County of San Bernardino approvals are listed in **Draft EIR Table 3-16: Proposed General Plan Permits and Approvals** (page 3-92) and **Table 3-17: BIG Permits and Approvals** (page 3-93). Per CEQA, a responsible agency should provide substantive comments, supported by specific documentation, regarding those project activities within an area of expertise of the agency or that are required to be carried out or approved by the agency. (Pub. Resources Code, § 21153(c).) Consistent with this, the City has carefully reviewed the San Bernardino County Department of Public Works' comments on the Draft EIR and where necessary, revised the EIR accordingly, except as otherwise explained in the responses to comments below.

L19-1 Thank you for your comment. While the comment does not raise any issue regarding the Draft EIR, it is provided in the Final EIR for the decision makers.

L19-2 Thank you for your comment. While the comment does not raise any issue regarding the Draft EIR, it is provided in the Final EIR for the decision makers.

L19-3 Thank you for your comment. While the comment does not raise any issue regarding the Draft EIR, it is provided in the Final EIR for the decision makers.

L19-4 The City has been coordinating with the San Bernardino Flood Control District, and the San Bernardino Department of Public Works before, generally, and specifically, since the inception of the General Plan and BIG. This coordination will continue through the development of the Tract Map and improvements needed to implement the project; and thereafter given the close inter-agency cooperation history.

L19-5 Thank you for your comment. Section 5.10 of the Draft EIR discusses Hydrology and includes the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) panel information on page 5.10-37, including updated FIRM panels 06071C4507H and 06071C4526H (August 28, 2022). The City appreciates the other information in the comment.

L19-6 Barstow Municipal Code Chapter 15.16: Floodplain Management stipulates how development in and around floodplains will be regulated. The City periodically updates the ordinance to be compliant with the FIRM program.

L19-7 The City has been coordinating with County Public Works on the proposed Project and is processing a maintenance agreement for some improvements that would occur outside the City limits. Thank you for the information regarding encroachment permits. The City understands that there may be conditions of approval on encroachment permits.

L19-8 See **Response L19-7**.

L19-9 See **Response L19-7**.

L19-10 See **Response L19-7**.

L19-11 through 15 The City is working with the San Bernardino Local Agency Formation Commission and thank you for the contact information.

COMMENT LETTER L20

385 N. Arrowhead Avenue San Bernardino, CA 92415 | Phone: 909.387.8311 Fax: 909.387.3223
www.SBCounty.gov

SAN BERNARDINO COUNTY

Land Use Services Department
Planning

Miguel Figueroa
Director

Thomas Bustamonte
Interim Assistant Director

January 13, 2026

City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311
generalplan@barstowca.org

RE: REVISIONS TO COMMENTS FOR THE BARSTOW INTERNATIONAL GATEWAY PROJECT ENVIRONMENTAL IMPACT REPORT AND SPECIFIC PLAN

On behalf of San Bernardino County Land Use Services, Planning Division, we respectfully request the City of Barstow accept the following revisions to our previous correspondence sent on January 12, 2026. We appreciate the opportunity to provide comments on the Draft Environmental Impact Report (DEIR) and Draft Specific Plan for the BIG Project. These revisions are to clarify the County's position on the project and are explicitly from County staff. L20-1

Zoning

The Specific Plan has a General Industrial land use comprising of approximately 4,335 acres. County zoning immediately adjacent to the Specific Plan is zoned for residential uses that include Rural Living and Single Residential. Given the sensitive nature of residential zoning, we recommend all feasible mitigation measures are considered for the adjacent areas as mentioned in the draft EIR are implemented. L20-2

Noise

It is recommended limiting nighttime construction for existing residences adjacent to the proposed BIG Specific Plan Area as noted in the draft EIR. L20-3

Air Quality

We encourage implementation of air quality mitigation practices during construction and throughout the life of the project given the sensitive receptors and land use designation adjacent to the BIG Specific Plan area. We also request opportunity to review the proposed Truck Routes as mentioned in MM BIG AQ-9: Truck Idling Limits and Truck Route Signage. L20-4

BOARD OF SUPERVISORS
Col. Paul Cook (Ret.) First District | Jesse Armendarez Second District | Dawn Rowe Chairman, Third District | Curt Hagman Fourth District | Joe Baca, Jr. Vice Chair, Fifth District
Luther Snoke Chief Executive Officer

COMMENT LETTER
01/13/2026
PAGE **2** of **2**

Light

It is recommended the Construction Lighting and Screening Plans address light trespass during construction and encourage all feasible mitigation measures be taken to reduce permanent light from the BIG and SP area per the draft EIR. This may be accomplished with shielding of lights, smart lights, placement of lights, etc. Screening around BIG footprint may be considered to limit light and glare as well where applicable. L20-5

Specifically, we encourage the City of Barstow to ensure measures identified in the draft EIR and Specific Plan and do the following:

- Incorporate clear, enforceable mitigation measures to reduce noise and light impacts.
- Continue engaging with the community and offer easy ways to raise and address concerns during construction and operation.

We believe careful consideration of these issues is necessary to protect the quality of life in surrounding residential land use designations.

If you have any questions or would like to discuss these comments further, please feel free to contact me at **paul.gonzales@lus.sbcounty.gov**. L20-6

Sincerely,



Planning Chief
Land Use Services Department
Phone: 909-387-4000
385 N. Arrowhead Ave. 1st floor

San Bernardino, CA, 92415

Land Use Services Website: http://cms.sbcounty.gov/lus/Home.aspx

RESPONSE TO COMMENT LETTER L20, SAN BERNARDINO COUNTY LAND USE SERVICES DEPARTMENT

The City acknowledges the County of San Bernardino's role as a Responsible Agency and its ability to exercise its own judgment regarding the Final EIR's adequacy in accordance with State CEQA Guidelines § 15096(e). A discussion related to the County of San Bernardino's jurisdiction relevant to BIG is included in **Draft EIR Section 3.0: Project Description** and **Draft EIR Sections 5.1** through **5.17**, as appropriate. The anticipated County of San Bernardino approvals are listed in **Draft EIR Table 3-16: Proposed General Plan Permits and Approvals** (page 3-92) and **Table 3-17: BIG Permits and Approvals** (page 3-93). Per CEQA, a responsible agency should provide substantive comments, supported by specific documentation, regarding those project activities within an area of expertise of the agency or that are required to be carried out or approved by the agency. (Pub. Resources Code, § 21153(c).) Consistent with this, the City has carefully reviewed the San Bernardino County Land Use Services Department's comments on the Draft EIR and where necessary, revised the EIR accordingly, except as otherwise explained in the responses to comments below.

L20-1 Thank you for your comment. While the comment does not raise any issue regarding the Draft EIR, it is provided in the Final EIR for the decision makers.

L20-2 All mitigation measures disclosed in the Draft EIR will be included in the mitigation monitoring and reporting programs for both BIG and the General Plan as required by CEQA. See Table 1-1, *Proposed General Plan: Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation,* and Table 1-2: *Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation – BIG,* in Chapter 1, *Executive Summary,* of the Draft EIR, which summarize the conclusions of the environmental analysis and includes a list of mitigation measures.

L20-3 The Draft EIR discusses the necessity of nighttime construction for BIG, see **Draft EIR Sections 3.0: Project Description**, **Section 3.8: Construction Activities**, and **Draft EIR Section 5.12: Noise and Vibration** (pages 5.12-79 and 5.12-80). Also see **Response O21-70** and revisions to **MM BIG NOI-1** discussed therein, which provide for a Nighttime Construction Noise Logistics Plan that would potentially include limitation of individual types of nighttime construction activity for BIG to daytime hours as mitigation for nighttime construction noise impacts, where feasible, if the Plan determines that other noise reduction measures incorporated into the Plan cannot feasibly ensure that exterior noise levels from an individual type of nighttime construction activity, at the residence or residences nearest to that activity, do not exceed the FTA's 70 dBA Leq (8-hour) nighttime exterior construction noise standard for residential uses.

L20-4 The City will continue to coordinate with San Bernardino County on the implementation of the mitigation measures. Truck routes are shown in Figure CM-4 Goods Movement, in the proposed General Plan included as **Draft EIR Appendix 3.0 GP-1.**

L20-5 See **Response L20-2**.

L20-6 Thank you for the contact information.

2.5 ORGANIZATION COMMENT LETTERS AND RESPONSES

COMMENT LETTER O1

O1

From: eugene.butticci barstowchamber.com
To: GeneralPlan@barstowca.org
Subject: General Plan Resolution
Attachments: 20251112 RESOLUTION OF SUPPORT FOR BIG Signed.pdf
Sent: 11/12/2025 8:36:57 AM

[NOTICE: THIS IS AN EXTERNAL EMAIL]
Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm.

Caution! This message was sent from outside your organization.

Best Regards,

Eugene Butticci
EXECUTIVE DIRECTOR
Office: 760.256.8617 | email: eugene.butticci@barstowchamber.com | web: www.barstowchamber.com |

BARSTOW
CHAMBER OF COMMERCE

MISSION STATEMENT:
To create an inclusive platform that helps business better market their products and services. To facilitate the creation of relationships between those organizations and individuals that want to make Barstow a better place to live, work, and have a business. To help organizations navigate business law, economic changes, and new marketing techniques now and into the future.

RESOLUTION OF SUPPORT FOR
BARSTOW INTERNATIONAL GATEWAY (BIG)

Page 13 of 20

RECITALS

WHEREAS, the railroad has been a part of the history of Barstow and the surrounding communities since the 1800s; and, O1-1

WHEREAS, BNSF is preparing to build a 4500-acre facility also known as BARSTOW INTERNATIONAL GATEWAY (BIG) to more efficiently move goods by rail from the ports of Los Angeles across the country; and, O1-2

WHEREAS, construction of the BIG facility will cost $4 billion and is expected to open in 2028; and, O1-3

WHEREAS, the City of Barstow has prepared an Environmental Impact Report including BIG/ Specific Plan and General Plan Update, which demonstrates that the City is fully prepared to provide municipal services for the project; and, O1-4

WHEREAS, this project will bring thousands of livable-wage jobs to Barstow; and, O1-5

WHEREAS, Barstow College is prepared to assist in training future employees for BIG; and, O1-6

WHEREAS, BNSF has agreed to give hiring preference to local hires; and, O1-7

WHEREAS, BIG will result in an increase in property and sales taxes, allowing the City of Barstow to serve the project as well as improve services throughout the City; and, O1-8

WHEREAS, BNSF agrees to allocate additional property tax funding for local Police Officers and Firefighters; O1-9

NOW, THEREFORE BE IT RESOLVED THAT THE BOARD OF DIRECTORS OF THE (Name of organization/agency/district) FULLY SUPPORTS THE APPROVAL OF THE UPDATED BARSTOW GENERAL PLAN AND THE CONSTRUCTION AND OPERATION OF THE BARSTOW INTERNATIONAL GATEWAY. O1-10

Passed, Approved and Adopted by the (Name of organization/agency/district) this 12 day of November, 2025. O1-11

By _____

Stephen Stewart, Board Chair

Barstow Chamber of Commerce

By _____

Eugene Butticel, Board Secretary

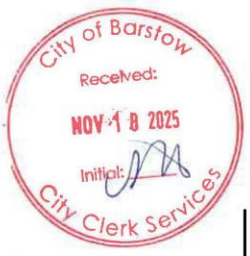
11/12/2025
approved by Board of Directors
motion: Stephen Stewart, and Kandy Yanz
vote: yes 8, No 0
passed

RESPONSE TO COMMENT LETTER O1, BARSTOW CHAMBER OF COMMERCE

O1-1 through -11 Thank you for your comment. See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER O2

GREATER High Desert CHAMBER OF COMMERCE



11/10/25

Dear Mayor Silva and Barstow Council Members,

I am writing to express strong support from the Greater High Desert Chamber of Commerce for the BNSF Barstow Industrial Gateway (BIG) Project. This project represents a tremendous opportunity for Barstow—one that will create thousands of jobs and give our young people countless reasons to build their futures right here at home. O2-1

The railroad has always been an integral part of Barstow's history, with many of our early residents coming here to work for Santa Fe. The new state-of-the-art BIG facility is a $4 billion investment in our community that will carry that legacy forward, attracting a new generation of workers and their families while reinforcing Barstow's role as a vital hub of commerce and industry. O2-2

In addition to job creation, this project will generate significant economic growth, stimulate local businesses, and increase tax revenue to support essential services such as our schools, police, and fire departments. O2-3

The BIG project is expected to generate greater economic activity in Barstow (higher employment, more families moving into the region, more commercial development). With more residents and increased economic vitality, local school districts may see improved tax receipts (either directly via property taxes, developer fees, or indirectly via stronger local economy) which can help school infrastructure, programs, and facilities. More funding could help build new school facilities, upgrade technology, add extra programs, reduce teacher shortages, or add new schools anticipating population growth. O2-4

BNSF has already been working with Barstow Community College (BCC) to create training programs aligned with BNSF's needs (e.g., a welding certification program and The Warehousing and Logistics Program). These workforce development opportunities will raise awareness among students that there are locally accessible "good jobs" without needing to relocate far away. Local schools will benefit by better aligning curricula with regional economic opportunity—raising engagement, motivation, and post-graduation pathways. O2-5

The BNSF BIG Project is a transformational project — it's the right fit for our community's future. Our chamber respectfully encourages the Barstow City Council to approve this project. O2-6

Sincerely,

Mark Creffield
President/CEO

Adelanto • Apple Valley • Hesperia • Victorville
www.ghdcc.com

RESPONSE TO COMMENT LETTER O2, GREATER HIGH DESERT CHAMBER OF COMMERCE

O2-1 through O2-6 Thank you for your comment. See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER O3



Quality Care...Close to Home.

bch
BARSTOW COMMUNITY HOSPITAL
820 E. Mountain View Street
Barstow, CA 92311
Phone: 760.256.1761
www.BarstowHospital.com

November 18, 2025

Dear Mayor Silva and Barstow Council Members,

I am writing to express my strong support for the BNSF Barstow Industrial Gateway (BIG) Project. This project represents a tremendous opportunity for Barstow—one that will create thousands of jobs and give our young people countless reasons to build their futures right here at home. O3-1

The railroad has always been an integral part of Barstow's history, with many of our early residents coming here to work for Santa Fe. The new state-of-the-art BIG facility is a $4 billion investment in our community that will carry that legacy forward, attracting a new generation of workers and their families while reinforcing Barstow's role as a vital hub of commerce and industry. O3-2

Barstow Community Hospital is in full support of the BNSF BIG Project in part because it will bring more people to the community, resulting in an increased need for medical services. More residents and workers result in an increased demand for primary care, specialty care, urgent care, mental health, and preventive services — which can justify expansion of healthcare infrastructure in Barstow. With more economic opportunity and improved community amenities (housing, retail, services) linked to BIG, Barstow will become more attractive for physicians, specialists, allied health providers and medical technicians. Barstow is in a Health Professional Shortage Area (HPSA) as designated by the federal agency Health Resources and Services Administration (HRSA). Expanded healthcare staffing can reduce local shortages and improve access. O3-3

The BNSF BIG Project is a transformational project — it's the right fit for our community's future. I respectfully encourage the Barstow City Council to approve this project. O3-4

Sincerely,

Adam Loris, CEO
Barstow Community Hospital

RESPONSE TO COMMENT LETTER O3, BARSTOW COMMUNITY HOSPITAL

O3-1 through O3-4 Thank you for your comment. See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER O4

O4

From: GeneralPlan@barstowca.org
To: BarstowBIG@chwlaw.us; Colin Drukker; Cory Witter
Cc: Matthew Summers; Taylor M. Anderson; Adam N. Mentzer
Subject: FW: Comment Extension Request—BNSF Barstow International Gateway Railyard Draft Environmental Impact Report SCH No. 2024020501
Date: Friday, November 21, 2025 2:10:25 PM
Attachments: BNSF Barstow Railyard Expansion Comment Ltr Re Extension Draft EIR.pdf

From: Marven Norman <marven.n@ccaej.org>
Sent: Friday, November 21, 2025 1:33 PM
To: GeneralPlan@barstowca.org
Cc: Yasmine Agelidis <yagelidis@earthjustice.org>
Subject: Comment Extension Request—BNSF Barstow International Gateway Railyard Draft Environmental Impact Report SCH No. 2024020501

[NOTICE: THIS IS AN EXTERNAL EMAIL]
Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!

Hello,

Please find attached a coalition letter requesting a 45-day extension of the comment response period for the Draft EIR for the proposed Barstow International Gateway project. We would appreciate a response acknowledging receipt of this email. Thank you.

O4-1

Cheers,
Marven E. Norman (he/him/his), Environmental Policy Analyst
Center for Community Action and Environmental Justice
Centro de Acción Comunitaria y Justicia Ambiental
| C: (951) 543-1743 | E: marven.n@ccaej.org | W: https://www.ccaej.org
This message may contain confidential information and is intended only for the individual named. If you are not the named addressee or if email content is defamatory, you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. E-mail transmission cannot be guaranteed to be secured or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. The City of Barstow and/or its staff members therefore does not accept liability for any errors or omissions in the contents of this message, which arise as a result of e-mail transmission. Web: www.barstowca.org | Address: 220 East Mountain View Street, Barstow, CA 92311

November 21, 2025

Chris Heldreth
Community Development Director
City of Barstow
220 East Mountain View Street, Suite A
Barstow, California 92311
generalplan@barstowca.org

Sent via email

Re: Comment Extension Request—BNSF Barstow International Gateway Railyard Draft Environmental Impact Report SCH No. 2024020501

Dear Mr. Heldreth:

The undersigned members of the environmental justice, health, labor, environmental, and academic organizations write to request a minimum of 45 additional days to comment on the Draft Environmental Impact Report (DEIR) for the BNSF Barstow International Gateway (BIG) Railyard. We believe a 45-day extension is appropriate given the extraordinary circumstances arising from the federal government shutdown, recent attacks on our communities, as well as the lack of Spanish translation of the DEIR. Moreover, the current comment period fails to provide adequate time to thoughtfully review the very large and complex environmental review document and its appendices over the holiday seasons, when many advocates and concerned residents are taking time off to be with their families. **We ask that the due date for comments from the public be pushed back to February 19, 2026.** O4-2

This project presents significant environmental justice concerns for Southern California residents, who already bear one of the highest air pollution burdens in the nation. The large number of diesel locomotives and other diesel equipment—many of which travel right outside our homes and schools—has resulted in our communities being labeled "diesel death zones." The residents represented by these organizations will be greatly impacted by this project, and it is imperative that your agency provide sufficient time to review the Draft EIR. O4-3

The federal government shutdown, which has been the longest in history, has subjected our most vulnerable community members to go without meals or having to make choices between food or other necessities due to the stop of SNAP benefits. Alongside this, childcare service resources, income from jobs, and the ability to travel amidst the holidays has also affected families. While many look for supplemental work to bridge the gap, time to engage or the thought of submitting comments has taken a backseat to mere survival. O4-4

At the same time, attacks by the federal government on communities impacted by this project have given rise to public safety concerns. San Bernardino County[1] has increased patrols in the aftermath O4-5

[1] "Sheriff's Department Increases Patrols Near Adelanto ICE Facility Following Deadly Anti-ICE Attack in Dallas," Victor Valley News Group (Sept. 24, 2025), *available at* https://www.vvng.com/sheriffs-department-increases-patrols-near-adelanto-ice-facility-following-deadly-anti-ice-attack-in-dallas/.

of deadly shootings at a Dallas ICE Detention Facility. Local mayors[2] and church leaders[3] in the Inland Empire have urged residents to stay home and avoid public gatherings. Some residents who would otherwise wish to participate in the public comment process are refraining from doing so or avoiding public events where support and resources for drafting comments are available.

California's bedrock environmental protection and community right-to-know law, the California Environmental Quality Act, was intended to allow the public and public officials to be fully informed about projects and be able to participate in decision-making in a meaningful way. The rush to move forward with a DEIR and proceed with minimal time for public input falls short of these principles. Extending the comment deadline by 45 days would allow the public and organizations like ours to have sufficient time to obtain the relevant documents, consult with experts, and provide informed comments to the City of Barstow.

O4-5 cont.

We appreciate your consideration. Please respond to this letter to let us know whether you will grant this request, and do not hesitate to contact us if you have questions.

Sincerely,

Alexis DeJesus
Center for Community Action & Environmental Justice

Yasmine Agelidis
Earthjustice

Taylor Thomas
East Yard Communities for Environmental Justice

Sylvia Betancourt
Long Beach Alliance for Children with Asthma

Alison Hahm
Natural Resources Defense Council

Davina Hurt
Cristhian Tapia-Delgado
Pacific Environment

Peter M. Warren
San Pedro & Peninsula Homeowners Coalition

Jocelyn Sida *(Joz)*
Sierra Club
San Gorgonio Chapter

Ryan Calbreath
United Electrical, Radio and Machine Workers of America

Andrea Hricko
Professor Emerita
USC Keck School of Medicine

[2] "Southern California mayor tells residents to say home amid ICE activity," KTLA 5 (July 10, 2025), *available at* https://www.youtube.com/watch?v=OI2YYsEhDoU.
[3] "California bishop lifts Sunday Mass obligation for churchgoers fearful of ICE raids," Hayley Miller (July 10, 2025), https://www.ms.now/top-stories/latest/bishop-san-bernardino-california-sunday-mass-ice-raids-rcna217835.

RESPONSE TO COMMENT LETTER O4, CENTER FOR COMMUNITY ACTION AND ENVIRONMENTAL JUSTICE (CCAEJ)

O4-1 The City of Barstow conducted an extensive outreach effort associated with the Project, including a bilingual Community Survey in April 2023, a bilingual Open House and Scoping Meeting in March 2024, a bilingual education video explaining all the Project components in November 2025 in advance of the Draft EIR release. Many advertisements were also conducted in a bilingual fashion, including bilingual outreach through local radio stations. Outreach materials were published in English and Spanish and posted on the City's website throughout the entire process. Additionally, in August 2024, the City reached out by phone and email to The Center for Community Action and Environmental Justice (CCAEJ) and The People's Collective for Environmental Justice (PC4EJ) and invited them to have discussions, take part directly in the process, and help facilitate others to participate. PC4EJ did not respond to any communications and CCAEJ indicated they would follow the project but opted not to take part.

While there continues to be no legal requirement for an EIR to be translated into Spanish, recent state legislation (Senate Bill 707, 2025) requires meeting agendas be translated into another language if, according to data from the most recent American Community Survey (ACS), 20 percent or more of the population speaks that language and speaks English less than "very well."

The City considered the prevalence of limited English-speaking households in the Barstow General Plan area when determining the need and value of translating draft and final documents. Data reported by the US Census Bureau (Table ID: C16002, Household Language by Household Limited English-Speaking Status, 2023 5-Year ACS), indicates that within the City of Barstow General Plan Area (incorporated and unincorporated), there are an estimated 266 limited English-speaking households that speak Spanish (representing roughly 1.9% of total households).

Of these 266 households:

- 182 are within the City of Barstow (incorporated only), also roughly 1.9% of households
- 137 are within areas mapped as environmental justice areas, also roughly 1.9% of households
- 64 are within the areas mapped as disadvantaged unincorporated communities, representing roughly 2.7% of households

These figures consistently represent around or less than 2 percent of households within the Barstow General Plan Area. This figure is far below the 20 percent threshold identified in state law for required meeting agenda translation. Furthermore, according to 2023 5-Year ACS data, approximately 97.5 percent of the households within the Barstow General Plan Area speak English or speak another language and are not limited English-speaking households. Accordingly, nearly all households can access the EIR in English, even when looking only at

areas mapped as environmental justice or disadvantaged unincorporated communities, and the City determined that translation of the EIR into Spanish was not warranted.

In 2021, the City adopted a standalone Environmental Justice Element. The analysis contained in the October 2025 General Plan Disadvantaged Communities Background Report ("Background Report"), incorporated by reference into **Draft EIR Appendix 3.0**, the proposed General Plan. The Background Report contains substantially more detailed and relevant analysis and information compared to the currently adopted Environmental Justice Element. The Background Report explains the proposed General Plan's compliance with SB 1000, addresses public services for disadvantaged communities pursuant to SB 244, addresses specifically local environmental issues with regarding to ozone and other pertinent issues, and identifies disadvantaged communities based on both CalEnviroScreen 4.0 and SB 244. The Background Report, also explains why the City opted to pursue the approach of addressing the topic of environmental justice throughout the General Plan, as permitted explicitly in state law. The Background Report also includes a compendium of relevant General Plan goals, policies, and implementation actions and related EIR mitigation measures organized by subtopics listed in state law to facilitate users' access and understanding.

This revised approach to environmental justice policies means that the proposed General Plan, upon adoption, would replace the existing Environmental Justice Element. While the City would no longer maintain a standalone Environmental Justice Element, the commitments and priorities set forth in the Environmental Justice Element informed and evolved into the environmental justice policies throughout the proposed General Plan. The proposed General Plan also provides annotations on policies and there is an explicit labeling in the Implementation Plan on which actions are directly related to specific subtopics of environmental justice as listed in state law.

See also **Consolidated Response 01** Community Outreach and Draft EIR Public Review Period.

O4-2 See **Consolidated Response 01-02** concerning the Draft EIR's public review period.

The Draft EIR and supporting technical studies have been made publicly available for review on the City's website and at Barstow City Hall. The extended review period provided by the lead agency was specifically intended to provide the public with sufficient opportunity to examine the materials and submit comments. The review period provided exceeds CEQA requirements and is considered adequate to allow meaningful public input.

Although a Spanish translation of the Draft EIR is not currently available, the Project has exceeded CEQA requirements for community participation. Over nearly two and a half years, the City conducted focused outreach and engagement with a broad range of community groups, including local neighborhoods, small businesses, seniors, veterans, and the Marine Corps Logistics Base. Key questions and concerns raised during these meetings were documented and made publicly accessible on the Barstow Chamber of Commerce website.

In accordance with the State CEQA Guidelines, the City and BNSF have undertaken extensive public outreach and engagement efforts to achieve regulatory compliance and promote

transparency throughout the environmental review process. The Notice of Preparation (NOP) was posted to the City's website, mailed to all property owners within 300 feet of the BIG Specific Plan, mailed to all responsible agencies, and published in the Victorville Daily Press. During the NOP's 40-day public review period, a total of 43 agency and public comments were received. All comments were reviewed by the City and incorporated into the environmental analysis, where appropriate.

Additionally, BNSF hosted or attended numerous public meetings to provide updates and receive feedback from stakeholders and residents. Notable events included town hall meetings at the Barstow College Performing Arts Center (April 26, 2023; October 3, 2024; and March 20, 2025), which were widely advertised and open to the public. More than 300 community members attended the October 2024 town hall. A dedicated meeting with Sylvan Avenue residents was held at the Hinkley Community Center in November 2025 to address specific concerns of those living in close proximity to BIG.

The City has fully complied with CEQA requirements for public review and exceeded the minimum standards by providing an extended review period and multiple avenues for public access. These efforts, combined with extensive outreach and engagement, demonstrate the City's commitment to transparency and meaningful public participation.

O4-3 It is important to note that environmental justice is not a threshold of significance under CEQA; however, the Draft EIR includes a detailed analysis of health risks and air quality impacts associated with BIG. As discussed in **Draft EIR Section 5.3: Air Quality**, the Draft EIR evaluates emissions from diesel locomotives and equipment, including localized health risk assessments for sensitive receptors such as homes and schools near BIG. The analysis quantifies potential increases in criteria pollutants and toxic air contaminants, and models health risk using conservative exposure assumptions.

To reduce health risks associated with BIG's air quality impacts, as part of the project design, BIG would include T4 line hauls and switchers, including Barstow Yard replacements, which would reduce localized impacts. In addition, the Draft EIR identifies a series of mitigation measures. These include requiring the use of best available control technologies for construction equipment, such as Tier 4 Final diesel engines or equivalent, and encouraging the use of renewable diesel or other low-emission fuels. Dust control measures are implemented during construction, including regular watering of exposed surfaces, application of soil stabilizers, and covering or stabilizing stockpiles to minimize particulate matter emissions. Idling times for construction and operational equipment are limited to reduce diesel exhaust emissions, and electric or zero-emission equipment is used where feasible, including electric hostlers and hybrid or electric material handling equipment. If modeled health risks at sensitive receptors exceed significance thresholds, installation of air filtration systems or other exposure reduction measures may be required. BIG also includes ongoing air quality monitoring during both construction and operation to verify compliance with emission limits and the effectiveness of mitigation measures. Construction activities are scheduled and phased to minimize cumulative emissions and avoid simultaneous operation of multiple high-emission sources near sensitive receptors. Collectively, these parts of the BIG

project design and measures are designed to reduce emissions of diesel particulate matter and other toxic air contaminants, thereby lowering health risks for nearby residents, schools, and other sensitive receptors. For further details, see **Draft EIR Section 5.3: Air Quality.**

Additionally, the Draft EIR addresses cumulative air quality impacts and the potential for increased human exposure in communities already experiencing high pollution burdens. For example, in **Draft EIR Section 5.9: Hazards, Hazardous Materials, and Wildfire**, the document evaluates the risk of hazardous materials and outlines protocols for spill prevention and emergency response. The Draft EIR also considers proximity to sensitive receptors and applies receptor-based methodologies in its technical analyses.

Additionally, the Disadvantaged Communities Background Report (City of Barstow, 2025), prepared for the City's proposed General Plan, addresses environmental justice (pursuant to SB 1000) and public services for disadvantaged unincorporated communities (pursuant to SB 244). The Disadvantaged Communities Background Report additionally details the Office of Environmental Health Hazard Assessment's CalEnviroScreen 4.0 tool. CalEnviroScreen uses census tract boundaries and 21 indicators to identify environmental justice communities within proposed General Plan area (i.e., the City and it's SOI), including BIG. The indicators are divided into two categories; pollution burden, which addresses topics such as exposure and environmental effects, and population characteristics, which describe sensitive populations and socioeconomic factors. Accordingly, the proposed General Plan environmental justice policies, developed pursuant to SB 1000 and applicable to the BIG project, are informed by relevant environmental justice data and governing regulatory requirements. Analysis of potential conflicts with the proposed General Plan, including policies related to environmental justice, is included in **Draft EIR Section 5.11**, pages 5.11-36 to 45 and 5.11-69 to 90 (see analysis concerning policies LU-1.1, LU-1.4, LU-1.5, LU-1.7, LU-2.4, LU-4.3, LU-4.4, H-3.6, CM-2.1, CM-2.7, CM-3.2, S-2.7, S-2.8, and OSC-3.1). As noted in its analysis of **Impact 5.11-2**, BIG would not conflict with any of these policies.

Also see **Consolidated Response 06** concerning BIG's potential impacts on nearby communities. See **Consolidated Response 17** concerning the HIA**,** which explains the HIA Report's finding that "Barstow residents and communities along the Corridor will not experience any meaningful or discernible individual or cumulative health impacts or health endpoint increases as a result of BIG construction or operations."

O4-4 The concerns expressed regarding the federal government shutdown and its impacts on food assistance, childcare, employment, and holiday travel are noted. However, these issues fall outside the scope of CEQA's environmental impact analysis and do not identify an analytical deficiency in the Draft EIR. As discussed in the **Consolidated Response 01-02,** the City provided a public review period for the Draft EIR that exceeded CEQA's minimum requirements, along with extensive outreach and multiple opportunities for public input over the last several years, ensuring that residents and stakeholders had sufficient time and access to participate in the process and review and comment on the environmental documents. The City's efforts included making materials available online and in person, hosting public meetings, and engaging with a wide range of community groups over more than two years.

O4-5 While the specific public safety issues described are outside the analytical scope of CEQA, which focuses on identifying, disclosing, and mitigating reasonably foreseeable environmental impacts of the proposed Project, the City is committed to facilitating meaningful access to the Draft EIR materials and providing multiple avenues for public comment. Multiple non-attendance options were available for submitting comments, including email, U.S. mail, and online submittal through the City's website. Written comments received by the close of the comment period are equally weighted and become part of the administrative record considered by decision makers. Additionally, materials are accessible remotely, as the Draft EIR and all technical appendices are posted on the City's website.

COMMENT LETTER O5

RESOLUTION OF SUPPORT FOR
BARSTOW INTERNATIONAL GATEWAY (BIG)

RECITALS

WHEREAS, the railroad has been a part of the history of Barstow and the surrounding communities since the 1800s; and, O5-1

WHEREAS, BNSF is preparing to build a 4500-acre facility also known as BARSTOW INTERNATIONAL GATEWAY (BIG) to more efficiently move goods by rail from the ports of Los Angeles across the country; and, O5-2

WHEREAS, construction of the BIG facility will cost $4 billion and is expected to open in 2028; and, O5-3

WHEREAS, the City of Barstow has prepared an Environmental Impact Report including BIG/ Specific Plan and General Plan Update which demonstrates that the City is fully prepared to provide municipal services for the project; and, O5-4

WHEREAS, BNSF has agreed to give hiring preference to local hires, bringing thousands of livable-wage jobs to Barstow. This will result in an increased need for medical services, including primary care, specialty care, urgent care, mental health, and preventive services — which can justify expansion of healthcare infrastructure in Barstow; and, O5-5

WHEREAS, BIG will result an increase in property and sales taxes allowing the City of Barstow to serve the project as well as improve services throughout the City; and, O5-6

WHEREAS, with more economic opportunity and improved community amenities (housing, retail, services) linked to BIG, Barstow will become more attractive for physicians, specialists, allied health providers and medical technicians. Barstow is in a Health Professional Shortage Area (HPSA) as designated by the federal agency Health Resources and Services Administration (HRSA). Expanded healthcare staffing can reduce local shortages and improve access; and O5-7

WHEREAS, BNSF agrees to allocate additional property tax funding for local Police Officers and Firefighters; O5-8

NOW, THEREFORE BE IT RESOLVED THAT BARSTOW COMMUNITY HOSPITAL BOARD OF TRUSTESS FULLY SUPPORTS THE APPROVAL OF THE UPDATED BARSTOW GENERAL PLAN AND THE CONSTRUCTION AND OPERATION OF THE BARSTOW INTERNATIONAL GATEWAY. O5-9

Passed, Approved and Adopted by Barstow Community Hospital's Board of Trustees this third day of December 2025.

By _____

Scott Martin, Board President

RESPONSE TO COMMENT LETTER O5, BARSTOW COMMUNITY HOSPITAL

O5-1 through O5-9 Thank you for your comment. See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER O6

exp® The opportunity engine

December 4, 2025

Mayor Timothy Silva & City Council
City of Barstow
Attn: Community Development
220 East Mountain View Street, Suite A
Barstow, CA 92311

Dear Mayor Silva and Barstow Council Members,

On behalf of EXP, I am writing to express my strong support for the BNSF Barstow International Gateway (BIG) Project. This project represents a tremendous opportunity for Barstow—one that will create thousands of jobs and give our young people countless reasons to build their futures right here at home. O6-1

At EXP our mission is to connect high school students to workforce educational opportunities which will help them thrive in school, career, and life. Our unique model brings together industry and educators to build tomorrow's workforce and provide real-world experience and mentorship in the goods movement industry. O6-2

Just as the railroad has been an integral part of Barstow's history, BNSF has been instrumental in bringing EXP programs to Barstow. It was with a BNSF grant in 2008 that helped EXP launched the Mojave Express Logistics Academy at Barstow High School. Since then thousands of Barstow students have been equipped with the professional skills, resources and experiences to succeed in college, career and life. O6-3

The collaboration between EXP, Barstow Community College (BCC) and BNSF will bridge the gap between school and career. BNSF has already been working with BCC to create training programs aligned with BNSF's needs (e.g., a welding certification program and The Warehousing and Logistics Program). This continuum of workforce development opportunities will raise awareness among students that there are locally accessible "good jobs" without needing to relocate. Barstow and Central High School students will benefit by better aligning career-centered curricula with regional economic opportunity—raising engagement, motivation, and post-graduation pathways. O6-4

The BNSF BIG Project is transformational $4 billion investment in the community, retaining and attracting a new generation of families while reinforcing Barstow's role as a vital hub of commerce and industry. With greater economic vitality comes greater quality of life for the entire community. EXP respectfully encourage the Barstow City Council to approve this project. O6-5

Sincerely,

Mary Tran, CEO

5000 E. Spring Street, Suite 300, Long Beach , CA 90815 · **FEIN** 74-3161465
o 424.368.7100 · **e** team@expfuture.org · **w** expfuture.org

RESPONSE TO COMMENT LETTER O6, EXP

O6-1 through O6-5 Thank you for your comment. See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER O7

GLENDORA OFFICE
2120 AUTO CENTRE DRIVE
GLENDORA, CA 91740-6720
(909) 305-2800 • FAX (909) 305-2822

SHEET METAL | AIR | RAIL | TRANSPORTATION WORKERS
SMART
Local Union 105

*BAKERSFIELD OFFICE
620 ENTERPRISE WAY, STE. A
BAKERSFIELD, CA 93307-6821
(661) 832-1187 • FAX (661) 832-1292

ALAN SANDOVAL
FINANCIAL SECRETARY-TREASURER
RECORDING SECRETARY

ALBERT "AL" HERNANDEZ
PRESIDENT
BUSINESS MANAGER

TIM HINSON
VICE PRESIDENT
BUSINESS REPRESENTATIVE

December 11, 2025

Mr. Chris Heldreth, Community Development Director
City of Barstow
220 East Mountain View Street, Suite A,
Barstow California 92311-2839
generalplan@barstowca.org

Re: DEIR for the City of Barstow General Plan Update and Barstow International Gateway Project

Dear Mr. Heldreth:

On behalf of Sheet Metal Workers Union Local 105, I write to express our strong support for the Barstow International Gateway (BIG) project, the proposed $4 billion master-planned rail facility in Barstow. Sheet Metal Workers Local 105, part of SMART, represents sheet metal workers across Southern California who fabricate and install HVAC ductwork, architectural sheet metal, specialty metal products, TAB, welding, and detailing, backed by training through the Southern California Sheet Metal JATC. O7-1

BIG is designed to provide an integrated rail yard, intermodal and warehouse facility, which would allow the direct transfer of containers from ships to trains at the ports of Los Angeles and Long Beach for short-haul rail trips to Barstow for sorting and onward transport throughout the U.S. O7-2

As noted in the recently released Draft Environmental Impact Report (EIR):

BIG would enhance supply chain resiliency, efficiency, and cost-effective goods movement by rail and was identified in the 2024 adopted California State Rail Plan to help build toward an integrated statewide rail and transit network and investments in zero emission infrastructure. O7-3

BIG would shift cargo from heavy duty trucking to rail transport at a location away from dense population centers, planned with the City as part of the proposed General Plan to site industrial uses on the western edge of the City away from residential uses. O7-4

BIG would provide economic stimulus and revitalization to the City through higher paying jobs, expansion of local skills training, and improved public services, including fire, police and utility infrastructure. O7-5

Business Representatives
Anthony Campos, *Quintin Morales, Jordan Chechitelli, Ruben Richards, Art Lopez, Donny E. Sappington, II, Laisene Malauulu, Joaquain Stallworth

BIG would create over 20 years: approximately 62,000 direct, indirect and induced construction jobs, including union construction jobs and approximately 15,000 direct, indirect, and induced operation jobs. In addition, the construction economic benefit is approximately $11 billion and operational economic benefit is approximately $7 billion.

O7-5 cont'd

And BNSF has committed to a Project Labor Agreement (PLA), ensuring that the facility will be built with well-paying union jobs. A PLA with Local 105 delivers a pipeline of union-trained sheet metal workers who can design, fabricate, and install products to improve coordination and quality, help projects meet energy-efficiency and indoor air-quality goals through code-savvy HVAC experts, and maintain consistent wage and benefit standards that support of working families in the City and region.
BIG is exactly the kind of private investment and strong commitment to union labor that we need here in California right now.

O7-6

We encourage the City of Barstow to finalize the EIR and approve the project, so that it can be built and start operations as soon as possible.

Thank you for your consideration of this matter. Please do not hesitate to contact me if you have any questions or require additional information.

O7-7

Sincerely,

Albert D. Hernandez
Business Manager / President

AL:ln/Letter to Chris Heldreth – City of Barstow General Plan Update and Barstow International Gateway Project – 12 11 25
opeiu 537 / afl-cio,clc

RESPONSE TO COMMENT LETTER O7, SMART LOCAL UNION 105

O7-1 through O7-7 Thank you for your comment. See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER O8

Robert J. Cooper, Jr.
Business Manager

Kristopher D. Winget
Financial Secretary-Treasurer

Carl J. Westby
President-Organizer

December 11, 2025

Chris Heldreth, Community Development Director
City of Barstow
220 East Mountain View Street, Suite A,
Barstow California 92311-2839
generalplan@barstowca.org

Re: DEIR for the City of Barstow General Plan Update and Barstow International Gateway Project

Dear Mr. Heldreth:

On behalf of UA Sprinkler Fitters Local 669, I write to express our strong support for the Barstow International Gateway (BIG) project, the proposed $4 billion master-planned rail facility in Barstow. UA Local 669 is a nationwide "road" local representing thousands of journeypersons and apprentices who specialize in installing, testing, and maintaining fire sprinkler and suppression systems, trained through a rigorous, multi-year JATC program focused on life-safety systems. O8-1

BIG is designed to provide an integrated rail yard, intermodal and warehouse facility, which would allow the direct transfer of containers from ships to trains at the ports of Los Angeles and Long Beach for short-haul rail trips to Barstow for sorting and onward transport throughout the U.S. O8-2

As noted in the recently released Draft Environmental Impact Report (EIR):

> *BIG would enhance supply chain resiliency, efficiency, and cost-effective goods movement by rail and was identified in the 2024 adopted California State Rail Plan to help build toward an integrated statewide rail and transit network and investments in zero emission infrastructure.*
>
> *BIG would shift cargo from heavy duty trucking to rail transport at a location away from dense population centers, planned with the City as part of the proposed General Plan to site industrial uses on the western edge of the City away from residential uses.*
>
> *BIG would provide economic stimulus and revitalization to the City through higher paying jobs, expansion of local skills training, and improved public services, including fire, police and utility infrastructure.*
>
> *BIG would create over 20 years: approximately 62,000 direct, indirect and induced construction jobs, including union construction jobs and approximately 15,000 direct, indirect, and induced operation jobs. In addition, the construction economic benefit is approximately $11 billion and operational economic benefit is approximately $7 billion.*

O8-3

And BNSF has committed to a Project Labor Agreement (PLA), ensuring that the facility will be built with well-paying union jobs. A PLA with Local 669 provides a dedicated, highly trained fire-sprinkler workforce essential for code compliance and life safety, improves coordination between design and installation on complex facilities, reduces rework and inspection failures through NFSA/UA-standard training, and offers regional staffing flexibility within a predictable wage and benefits framework. O8-4

Road Sprinkler Fitters Local Union No. 669
7050 Oakland Mills Road • Suite 200 • Columbia, Maryland 21046
(410) 381-4300 • fax: (301) 621-8045 • www.sprinklerfitters669.org

BIG is exactly the kind of private investment and strong commitment to union labor that we need here in California right now.

We encourage the City of Barstow to finalize the EIR and approve the project, so that it can be built and start operations as soon as possible.

O8-5

Thank you for your consideration of this matter. Please do not hesitate to contact me if you have any questions or require additional information.

Sincerely,



Todd Barry

Business Agent

TB:kh
cc: Todd Barry, Business Agent, Local Union 669

RESPONSE TO COMMENT LETTER O8, ROAD SPRINKLER FITTERS UA LOCAL 669

O8-1 through O8-5 Thank you for your comment. See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER O9

District Council of Iron Workers of the State of California and Vicinity
3281 E. Guasti Rd., Suite 625, Ontario, CA 91761
Telephone (510) 724-9277

December 11, 2025

Chris Heldreth, Community Development Director
City of Barstow
220 East Mountain View Street, Suite A,
Barstow California 92311-2839
generalplan@barstowca.org

Re: DEIR for the City of Barstow General Plan Update and Barstow International Gateway Project

President
David Osborne

District Representatives
Erik Schmidli
Victor Lopez
Field Representative
Jonathan Paramo

Executive Council
Local Union 75
Jason Sangster
Local Union 118
Troy Arntson
Local Union 155
Jesus Castaneda
Local Union 229
Beau Coleman
Local Union 377
Charles Hernandez
Local Union 378
Jason Gallia
Local Union 416
Frankie Jimenez
Local Union 433
Keith Harkey
Local Union 625
Joe O'Donnell
Local Union 855
Jonathan Paramo

Dear Mr. Heldreth:

On behalf of District Council of Iron Workers of the State of California and Vicinity (DCIW), I write to express our strong support for the Barstow International Gateway (BIG) project, the proposed $4 billion master-planned rail facility in Barstow. DCIW is the umbrella organization representing multiple Ironworker locals across California and nearby areas, coordinating collective bargaining and advocating for improved wages, benefits, and working conditions for ironworkers. O9-1

BIG is designed to provide an integrated rail yard, intermodal and warehouse facility, which would allow the direct transfer of containers from ships to trains at the ports of Los Angeles and Long Beach for short-haul rail trips to Barstow for sorting and onward transport throughout the U.S. O9-2

As noted in the recently released Draft Environmental Impact Report (EIR): O9-3

> *BIG would enhance supply chain resiliency, efficiency, and cost-effective goods movement by rail and was identified in the 2024 adopted California State Rail Plan to help build toward an integrated statewide rail and transit network and investments in zero emission infrastructure.*
>
> *BIG would shift cargo from heavy duty trucking to rail transport at a location away from dense population centers, planned with the City as part of the proposed General Plan to site industrial uses on the western edge of the City away from residential uses.*
>
> *BIG would provide economic stimulus and revitalization to the City through higher paying jobs, expansion of local skills training, and improved public services, including fire, police and utility infrastructure.*
>
> *BIG would create over 20 years: approximately 62,000 direct, indirect and induced construction jobs, including union construction jobs and approximately 15,000 direct, indirect, and induced operation jobs. In addition, the construction economic benefit is approximately $11 billion and operational economic benefit is approximately $7 billion.*

California Arizona Hawaii Nevada

And BNSF has committed to a Project Labor Agreement (PLA), ensuring that the facility will be built with well-paying union jobs. This commitment ensures that the project will maximize community, economic, and employment benefits; and protect worker health and safety. In particular, the Applicant's commitment to local hire will ensure that skilled and trained local construction workers who build the project will be paid living wages, work in a safe worksite, and receive good benefits for their work. In doing so, BNSF has demonstrated an overriding commitment to helping the local economy remain robust. O9-4

BIG is exactly the kind of private investment and strong commitment to union labor that we need here in California right now.

We encourage the City of Barstow to finalize the EIR and approve the project, so that it can be built and start operations as soon as possible. O9-5

Thank you for your consideration of this matter. Please do not hesitate to contact me if you have any questions or require additional information.

Sincerely,



David S. Osborne
President

RESPONSE TO COMMENT LETTER O9, DISTRICT COUNCIL OF IRONWORKERS OF THE STATE OF CALIFORNIA AND VICINITY

O9-1 through O9-5 Thank you for your comment. See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER O10

International Association of
Bridge, Structural, Ornamental, and Reinforcing Ironworkers
Local Union 416

12/11/2025

Chris Heldreth, Community Development Director
City of Barstow
220 East Mountain View Street, Suite A,
Barstow California 92311-2839
generalplan@barstowca.org

Re: DEIR for the City of Barstow General Plan Update and Barstow International Gateway Project

Dear Mr. Heldreth:

On behalf of Reinforcing Ironworkers Local 416, I write to express our strong support for the Barstow International Gateway (BIG) project, the proposed $4 billion master-planned rail facility in Barstow. Local 416 represents thousands of rebar and reinforcing steel workers across Southern California, including Barstow, operating a registered apprenticeship program through the "University of Iron" to train reinforcing ironworkers via a multi-year curriculum that meets industry workforce needs. O10-1

BIG is designed to provide an integrated rail yard, intermodal and warehouse facility, which would allow the direct transfer of containers from ships to trains at the ports of Los Angeles and Long Beach for short-haul rail trips to Barstow for sorting and onward transport throughout the U.S. O10-2

As noted in the recently released Draft Environmental Impact Report (EIR):

> *BIG would enhance supply chain resiliency, efficiency, and cost-effective goods movement by rail and was identified in the 2024 adopted California State Rail Plan to help build toward an integrated statewide rail and transit network and investments in zero emission infrastructure.*
>
> *BIG would shift cargo from heavy duty trucking to rail transport at a location away from dense population centers, planned with the City as part of the proposed General Plan to site industrial uses on the western edge of the City away from residential uses.*
>
> *BIG would provide economic stimulus and revitalization to the City through higher paying jobs, expansion of local skills training, and improved public services, including fire, police and utility infrastructure.*
>
> *BIG would create over 20 years: approximately 62,000 direct, indirect and induced construction jobs, including union construction jobs and approximately 15,000 direct, indirect, and induced operation jobs. In addition, the construction economic benefit is approximately $11 billion and operational economic benefit is approximately $7 billion.*

O10-3

And BNSF has committed to a Project Labor Agreement (PLA), ensuring that the facility will be built with well-paying union jobs. A PLA with Local 416 ensures that complex reinforcing steel work critical to structural integrity and seismic performance is performed by specialists trained in current codes and congested rebar layouts, reduces structural and inspection issues, helps satisfy apprenticeship and skilled-labor requirements for concrete work, and provides access to a mobile, experienced workforce for multiple pours and critical path operations. It also means that our local ironworkers get an opportunity to work near home and contribute to the well-being of the City. O10-4

BIG is exactly the kind of private investment and strong commitment to union labor that we need here in California right now.

We encourage the City of Barstow to finalize the EIR and approve the project, so that it can be built and start operations as soon as possible. O10-5

Thank you for your consideration of this matter. Please do not hesitate to contact me if you have any questions or require additional information.

Sincerely,

Frankie Jimenez
Business Manager/ F.S.T.

13830 San Antonio Dr., Norwalk, CA 90650 • (562) 868-1251
960 Wigwam Pkwy., Suite 130, Henderson, NV 89014 • (702) 434-7416
www.ironworkers416.org

RESPONSE TO COMMENT LETTER O10, IRONWORKERS LOCAL 416

O10-1 through O10-5 Thank you for your comment. See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER O11

O11

DEIR Support Letter

Local 364 <office@ualocal364.org>

Mon 12/15/2025 7:55 AM

To: GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

Cc: Joe Raymond <jraymond@ualocal364.org>;

1 attachments (842 KB)

DEIR Support Letter.pdf;

[NOTICE: THIS IS AN EXTERNAL EMAIL]

Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!

Caution! This message was sent from outside your organization.

Good Morning,

This letter is on behalf of Business Manager Joe Raymond. Have a great day.

Thank you,
Evelyn Altamirano

P. (909) 825-0359 **F.** (909) 824-8362
A. 223 S. Rancho Ave, Colton, CA 92324
E. office@ualocal364.org

UNITED ASSOCIATION

PLUMBERS

JOE RAYMOND
BUSINESS MANAGER
FINANCIAL SECRETARY
TREASURER

LOCAL 364

PIPEFITTERS

223 S. RANCHO AVE.
COLTON, CA 92324
PH: 909 825-0359
FX: 909 824-8362

www.ualocal364.org

12/11/2025

Chris Heldreth, Community Development Director
City of Barstow
220 East Mountain View Street, Suite A,
Barstow California 92311-2839
generalplan@barstowca.org

Re: DEIR for the City of Barstow General Plan Update and Barstow International Gateway Project

Dear Mr. Heldreth:

On behalf of UA Plumbers and Pipefitters Union Local 364, I write to express our strong support for the Barstow International Gateway (BIG) project, the proposed $4 billion master-planned rail facility in Barstow. UA Local 364 represents plumbers, pipefitters, welders, refrigeration and HVAC technicians serving San Bernardino and Riverside Counties and Edwards Air Force Base and has supplied highly trained pipe trades workers to commercial, residential, and industrial projects in the Inland Empire for over a century. O11-1

BIG is designed to provide an integrated rail yard, intermodal and warehouse facility, which would allow the direct transfer of containers from ships to trains at the ports of Los Angeles and Long Beach for short-haul rail trips to Barstow for sorting and onward transport throughout the U.S. O11-2

As noted in the recently released Draft Environmental Impact Report (EIR): O11-3

> *BIG would enhance supply chain resiliency, efficiency, and cost-effective goods movement by rail and was identified in the 2024 adopted California State Rail Plan to help build toward an integrated statewide rail and transit network and investments in zero emission infrastructure.*
>
> *BIG would shift cargo from heavy duty trucking to rail transport at a location away from dense population centers, planned with the City as part of the proposed General Plan to site industrial uses on the western edge of the City away from residential uses.*

BIG would provide economic stimulus and revitalization to the City through higher paying jobs, expansion of local skills training, and improved public services, including fire, police and utility infrastructure.

BIG would create over 20 years: approximately 62,000 direct, indirect and induced construction jobs, including union construction jobs and approximately 15,000 direct, indirect, and induced operation jobs. In addition, the construction economic benefit is approximately $11 billion and operational economic benefit is approximately $7 billion.

O11-3 cont'd

And BNSF has committed to a Project Labor Agreement (PLA), ensuring that the facility will be built with well-paying union jobs. A PLA with Local 364 secures a licensed, apprenticeship-trained plumbing and pipefitting workforce for complex mechanical and HVAC scopes, improves safety and reliability through up-to-date certifications, supports local middle-class careers in Barstow, and reduces labor disruptions by establishing clear wages, benefits, work rules, and dispute-resolution procedures in advance.

O11-4

BIG is exactly the kind of private investment and strong commitment to union labor that we need here in California right now.

We encourage the City of Barstow to finalize the EIR and approve the project, so that it can be built and start operations as soon as possible.

Thank you for your consideration of this matter. Please do not hesitate to contact me if you have any questions or require additional information.

O11-5

Sincerely,

Joe Raymond
Business Manager

RESPONSE TO COMMENT LETTER O11, UNITED ASSOCIATION LOCAL 364

O11-1 through O11-5 Thank you for your comment. See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER O12

O12

Barstow International Gateway Support Letter

Unions Together <members@unionstogether.com>

Mon 12/15/2025 9:44 AM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

1 attachments (96 KB)

SKM_C551i25121217180.pdf;

[NOTICE: THIS IS AN EXTERNAL EMAIL]

Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!

Caution! This message was sent from outside your organization.

Good morning,

Attached is our Support Letter for the Barstow International Gateway (BIG) project.

Thank you.

IBEW LOCAL UNION 477

December 12, 2025

Chris Heldreth, Community Development Director
City of Barstow
220 East Mountain View Street, Suite A,
Barstow California 92311-2839
generalplan@barstowca.org

Re: DEIR for the City of Barstow General Plan Update and Barstow International Gateway Project

Dear Mr. Heldreth:

On behalf of International Brotherhood of Electrical Workers (IBEW)Union Local 477, I write to express our strong support for the Barstow International Gateway (BIG) project, the proposed $4 billion master-planned rail facility in Barstow. IBEW Local 477 is the construction and electrical workers' labor union based in San Bernardino, serving the Inland Empire and surrounding areas as part of an international Union of hundreds of thousands of electricians, and it partners with N.E.C.A. (National Electrical Contractors Asociation) and the Inland Empire Electrical Training Center to deliver state-of-the-art apprenticeship and journeyman training. O12-1

BIG is designed to provide an integrated rail yard, intermodal and warehouse facility, which would allow the direct transfer of containers from ships to trains at the Ports of Los Angeles and Long Beach for short-haul rail trips to Barstow for sorting and onward transport throughout the U.S. O12-2

As noted in the recently released Draft Environmental Impact Report (EIR): O12-3

BIG would enhance supply chain resiliency, efficiency, and cost-effective goods movement by rail and was identified in the 2024 adopted California State Rail Plan to help build toward an integrated statewide rail and transit network and investments in zero emission infrastructure.

BIG would shift cargo from heavy duty trucking to rail transport at a location away from dense population centers, planned with the City as part of the proposed General Plan to site industrial uses on the western edge of the City away from residential uses.

BIG would provide economic stimulus and revitalization to the City through higher paying jobs, expansion of local skills training, and improved public services, including fire, police and utility infrastructure.

INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS

1875 S. Business Center Drive
San Bernardino, CA 92408
(909) 890-0607
(909) 890-0659 Fax

JASON L. ESHELMAN
Business Manager/Financial Secretary

MICHAEL VASQUEZ
President

Chris Heldreth, Community Development Director
City of Barstow
December 12, 2025

PAGE 2

BIG would create over 20 years: approximately 62,000 direct, indirect and induced construction jobs, including union construction jobs and approximately 15,000 direct, indirect, and induced operation jobs. In addition, the construction economic benefit is approximately $11 billion and operational economic benefit is approximately $7 billion.

O12-3 cont'd

BNSF has committed to a Project Labor Agreement (PLA), ensuring that the facility will be built with well-paying union jobs. A PLA with Local 477 secures a highly skilled electrical workforce proficient in current code and emerging technologies, reduces the risk of failures, outages, and change-orders through strong safety and training standards, channels project dollars into well-paying local careers, and promotes schedule stability via established collective bargaining relationships with N.E.C.A.

O12-4

BIG is exactly the kind of private investment and strong commitment to Union labor that we need here in California right now.

We encourage the City of Barstow to finalize the EIR and approve the project, so that it can be built and start operations as soon as possible.

O12-5

Thank you for your consideration of this matter. Please do not hesitate to contact me if you have any questions or require additional information.

Sincerely,

I.B.E.W. LOCAL UNION 477

Jason L. Eshelman
Business Manager/Financial Secretary

JLE/mw ibew#477, afl-cio, clc

RESPONSE TO COMMENT LETTER O12, IBEW LOCAL UNION 477

O12-1 through O12-5 Thank you for your comment. See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER O13

Ironworkers Local 433
International Association of Bridge, Structural & Ornamental Iron Workers A.F.L.-C.I.O.
Established 1929

17495 HURLEY STREET EAST CITY OF INDUSTRY, CALIFORNIA 91744

PHONE: (626) 964-2500
FAX: (626) 964-1919
keith@ironworkers433.org

KEITH HARKEY
Business Manager
Financial Secretary-Treasurer

12/15/2025

Chris Heldreth, Community Development Director
City of Barstow
220 East Mountain View Street, Suite A,
Barstow California 92311-2839
generalplan@barstowca.org

Re: DEIR for the City of Barstow General Plan Update and Barstow International Gateway Project

Dear Mr. Heldreth:

On behalf of Ironworkers Local 433, I write to express our strong support for the Barstow International Gateway (BIG) project, the proposed $4 billion master-planned rail facility in Barstow. Local 433 is a structural ironworkers' local based in Los Angeles with thousands of members across Southern California, including Barstow, and up to Las Vegas, and surrounding areas, focusing on structural steel erection, ornamental iron, and related scopes and training its members through the "University of Iron" JATC. O13-1

BIG is designed to provide an integrated rail yard, intermodal and warehouse facility, which would allow the direct transfer of containers from ships to trains at the ports of Los Angeles and Long Beach for short-haul rail trips to Barstow for sorting and onward transport throughout the U.S. O13-2

As noted in the recently released Draft Environmental Impact Report (EIR): O13-3

BIG would enhance supply chain resiliency, efficiency, and cost-effective goods movement by rail and was identified in the 2024 adopted California State Rail Plan to help build toward an integrated statewide rail and transit network and investments in zero emission infrastructure.

BIG would shift cargo from heavy duty trucking to rail transport at a location away from dense population centers, planned with the City as part of the proposed General Plan to site industrial uses on the western edge of the City away from residential uses.

BIG would provide economic stimulus and revitalization to the City through higher paying jobs, expansion of local skills training, and improved public services, including fire, police and utility infrastructure.

BIG would create over 20 years: approximately 62,000 direct, indirect and induced construction jobs, including union construction jobs and approximately 15,000 direct, indirect, and induced operation

jobs. In addition, the construction economic benefit is approximately $11 billion and operational economic benefit is approximately $7 billion. O13-3 cont'd

And BNSF has committed to a Project Labor Agreement (PLA), ensuring that the facility will be built with well-paying union jobs. A PLA with Local 433 brings in an experienced local workforce, improves safety for high-risk steel erection through rigorous training, and supports regional economic and workforce goals by sustaining stable, union ironwork careers in the City. O13-4

BIG is exactly the kind of private investment and strong commitment to union labor that we need here in California right now.

We encourage the City of Barstow to finalize the EIR and approve the project, so that it can be built and start operations as soon as possible. O13-5

Thank you for your consideration of this matter. Please do not hesitate to contact me if you have any questions or require additional information.

Sincerely,

Keith Harkey
Business Manager
Ironworkers Local 433

RESPONSE TO COMMENT LETTER O13, IRONWORKERS LOCAL 433

O13-1 through O13-5 Thank you for your comment. See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER O14

BARSTOW COMMUNITY COLLEGE DISTRICT
RESOLUTION NO. 01/2025-2026

SUPPORT FOR BARSTOW INTERNATIONAL GATEWAY (BIG)

WHEREAS, the railroad has been a part of the history of Barstow and the surrounding communities since the 1800s; and, O14-1

WHEREAS, BNSF is preparing to build a 4500-acre facility also known as BARSTOW INTERNATIONAL GATEWAY (BIG) to more efficiently move goods by rail from the ports of Los Angeles across the country; and, O14-2

WHEREAS, construction of the BIG facility will cost $4 billion and is expected to open in 2028; and, O14-3

WHEREAS, the City of Barstow has prepared an Environmental Impact Report including BIG/ Specific Plan and General Plan Update which demonstrates that the City is fully prepared to provide municipal services for the project; and, O14-4

WHEREAS, this project will bring thousands of livable-wage jobs to Barstow; and, O14-5

WHEREAS, Barstow College is prepared to assist in training future employees for BIG; and, O14-6

WHEREAS, BNSF has agreed to give hiring preference to local hires; and, O14-7

WHEREAS, BIG will result in an increase in property and sales taxes allowing the City of Barstow to serve the project as well as improve services throughout the City; and, O14-8

WHEREAS, BNSF agrees to allocate additional property tax funding for local Police Officers and Firefighters; O14-9

NOW, THEREFORE, BE IT RESOLVED the governing board of the Barstow Community College District hereby fully supports the approval of the updated Barstow General Plan and the construction and operation of the Barstow International Gateway. O14-10

Resolution No. 01/2025-2026
Passed, Approved and Adopted by the
Board of Trustees
This 17th day of December, 2025

Julie Hackbarth-McIntyre
President, Board of Trustees

RESPONSE TO COMMENT LETTER O14, BARSTOW COMMUNITY COLLEGE

O14-1 through O14-10 Thank you for your comment. See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER O15

Letter of Support for the Barstow International Gateway (BIG) Project

Subject: Comments to EIR

Dear City of Barstow,

I am writing on behalf of Local Equity to express our strong support for the Barstow International Gateway (BIG) project. Based on our direct experience working with the City of Barstow over the past three years, we believe BIG represents a transformational opportunity not only for Barstow, but also for California's logistics network and the national supply chain. O15-1

Local Equity has worked closely with the City of Barstow on economic development strategy, project coordination, and interagency communication, including participation in strategic planning and coordination meetings involving BNSF Railway. Through those works, we have developed a deep understanding of Barstow's logistical advantages, infrastructure constraints, and long-term economic development goals. The BIG project directly aligns with those goals by leveraging Barstow's unique position as a critical rail and freight hub in the Southwest. O15-2

From an economic perspective, BIG will support large-scale job creation, attract long-term private investment, and strengthen Barstow's role in goods movement and advanced logistics. The BIG project will sustain regional economic growth and ensure that California remains competitive in national and global supply chains. O15-3

BIG also delivers meaningful environmental and community benefits. By shifting freight movement from trucks to rail, the project will reduce highway congestion, lower greenhouse gas emissions, and improve air quality for communities throughout Southern California. The use of newer, cleaner equipment further enhances these benefits and reflects a forward-looking approach to sustainable freight infrastructure. O15-4

Local Equity strongly supports advancing the BIG project. We believe it is a strategic, responsible investment that will deliver lasting economic, environmental, and supply-chain benefits for Barstow, the State of California, and the nation. O15-5

Thank you for your leadership and consideration. We encourage your continued support in moving the project forward. O15-6

Sincerely,
Dr. Gil Keinan, Managing Director
Local Equity LLC

Local Equity • 458 N Doheny Dr. Unit 802 • West Hollywood, CA 90048 • info@localequity.com • www.localequity.com • 213.373.1353

RESPONSE TO COMMENT LETTER O15, LOCAL EQUITY LLC

O15-1 through O15-6 Thank you for your comment. See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER O16

O16

From: Amanda Simpson
To: Justin Hager
Subject: City Response to EIR/BIG Questions
Sent: 12/18/2025 6:56:22 PM

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Good Evening Justin,

Sorry to reach out after hours, however the College had posted a resolution in support of the BIG project and a question came up about the increase in taxes. Does the City have a response they are providing to the incerase in tax concerns? We would like to provide the same information/response or direct them to an area where they can get a response. I hope that makes sense. O16-1

If we need to jump on a call to clarify, please let me know and I can do that.

Thank you again,

Amanda Simpson, (she, her, hers)
Director, Public Relations, Communications, and Marketing
Barstow Community College
asimpson@barstow.edu
760-252-6727

RESPONSE TO COMMENT LETTER O16, BARSTOW COMMUNITY COLLEGE

O16-1 **Draft EIR Appendix 5.11 BIG-1: Economic and Fiscal Impact Analysis** provides an economic and fiscal impact analysis with property tax assumptions developed from the California Department of Tax and Fee Administration and the San Bernardino County Auditor. Furthermore, effective state income tax rates were derived from the 2021 State of California Comprehensive Annual Financial Report. The effective tax rate for 2021 was estimated at 6%; this tax rate is held constant over the forecast period. An increase in tax revenues would be a result of the construction and operation of any proposed industrial use, where an initial change in one sector creates broader ripple effects through other sectors. See **Draft EIR Appendix 5.11 BIG-1** for more information. This comment does not raise any specific issues or questions on the environmental analysis provided in the Draft EIR. No changes to the Draft EIR are required.

COMMENT LETTER O17

P: (626) 314-3821
E: info@mitchtsailaw.com

Mitchell M. Tsai
Law Firm

139 S. Hudson Ave., Suite 200
Pasadena, California 91101

VIA E-MAIL

December 30, 2025

City of Barstow
220 East Mountain View Street
Suite A
Barstow, CA 92311
Em: generalplan@barstowca.org

RE: City of Barstow, Barstow International Gateway Project DEIR

Dear City Staff:

On behalf of the Western States Regional Council of Carpenters ("**Western Carpenters**" or "**WSRCC**"), my Office is submitting these comments addressing the City of Barstow's Notice of Availability of the Draft Environmental Impact Re port (DEIR) for the City of Barstow Proposed General Plan Update and Barstow International Gateway Project ("**Project**"). O17-1

WSRCC would like to express its support for this Project. After further reviewing this Project, WSRCC believes that the Project will benefit the environment and the local economy by practicing protocols that will protect worker health and safety and will incorporate adequate environmental mitigation. O17-2

Should the City have any questions or concerns, the City should feel free to contact my office. O17-3

Sincerely,

Jeremy H. Herwitt
Attorneys for Western States Regional Council of Carpenters

RESPONSE TO COMMENT LETTER O17, WESTERN STATES REGIONAL COUNCIL OF CARPENTERS

O17-1 through O17-3 Thank you for your comment. See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER O18

O18

From: Chris Heldreth
To: Colin Drukker; Rochelle Clayton; Kenneth D. Chapa
Subject: Fw: A Defining Opportunity for Barstow: Ensuring the Barstow International Gateway Delivers Jobs, Healing, and Shared Prosperity
Date: Wednesday, December 31, 2025 7:36:43 PM
Attachments: Barstow International Gateway (BIG).pdf

Colin, can you post this when you get a chance. Thank you.

Hope you have a Happy New Year!!

Chris

Sent from my Verizon, Samsung Galaxy smartphone
Get Outlook for Android

From: Latrina Wallace <lwallace@trinnaz.com>
Sent: Wednesday, December 31, 2025 7:31:11 PM
To: tsilva@barstowca.org <tsilva@barstowca.org>; brose@barstowca.org <brose@barstowca.org>; jnoble@barstowca.org <jnoble@barstowca.org>; jwilliams@barstowca.org <jwilliams@barstowca.org>; chernandez@barstowca.org <chernandez@barstowca.org>
Cc: Chris Heldreth <Cheldreth@barstowca.org>; Kenneth D. Chapa <kchapa@barstowca.org>; rclayton@barstowca.org <rclayton@barstowca.org>
Subject: A Defining Opportunity for Barstow: Ensuring the Barstow International Gateway Delivers Jobs, Healing, and Shared Prosperity

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Dear Honorable Members of the Barstow City Council,

Please accept the attached, signed letter from Trin'Naz Helping Hands for the City's official record regarding the Barstow International Gateway (BIG) project.

I respectfully request that the City Council consider formal action related to BIG by placing the following items on a future agenda, or addressing them through an appropriate Council or staff action:

O18-1

- Establishment of local-hire targets prioritizing Barstow residents
- Development of workforce development MOUs with community partners
- Implementation of annual public reporting on local employment outcomes associated with BIG

These measures are intended to ensure transparency, accountability, and equitable local benefit as the project advances.

Thank you for your consideration and for including this submission in the City's records. I am

O18-1

available to provide additional information if requested.

Respectfully submitted,

Latrina
Executive Director
Trin'Naz Helping Hands

Attachment: Signed Letter – Barstow International Gateway (BIG)

--

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December 31, 2025

Honorable Mayor and Members of the Barstow City Council
City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

Re: Support for the Barstow International Gateway (BIG) with Priority for Barstow Residents

Dear Honorable Members of the Barstow City Council,

Barstow stands at a crossroads.

The Barstow International Gateway (BIG) is more than a logistics and infrastructure project; it is a defining opportunity to determine who benefits from growth, who is left behind, and what kind of future Barstow chooses to build. With intentional leadership, BIG can become a catalyst not only for regional economic expansion but for healing, stability, and long-term independence for the residents who have endured years of disinvestment, trauma, and economic hardship. O18-2

Trin'Naz Helping Hands is a Barstow-based nonprofit organization committed to serving individuals and families impacted by trauma and systemic inequities. Our work centers on victims of crime, youth aging out of foster care, individuals experiencing homelessness, and residents in need of emotional and educational support. Every day, we see firsthand how unemployment, lack of opportunity, and limited access to services compound trauma and erode hope. We also see how stable employment and community investment can restore dignity, independence, and resilience. O18-3

The challenges our clients face mirror those faced by Barstow itself. Despite its strategic location along major transportation corridors, Barstow continues to struggle with higher-than-average unemployment, underutilized land, and limited local access to jobs, healthcare, and essential services. Many residents are forced to leave the city for work and medical care, draining local wages, weakening small businesses, and reinforcing the perception of decline, not because of the people of Barstow, but because opportunity has too often passed them by. O18-4

BIG has the potential to change that trajectory.

As proposed, the Barstow International Gateway is expected to generate substantial economic activity and create a significant number of well-paying jobs. If structured thoughtfully, these jobs can provide pathways to housing stability, reduced justice system involvement, improved mental health outcomes, and long-term self-sufficiency, particularly for individuals who have historically faced barriers to employment. For a young adult aging out of foster care, a survivor of violent crime rebuilding their life, or a family working to exit homelessness, a stable job is not just income; it is a lifeline. O18-5

However, these benefits are not automatic. O18-6

Without explicit local hiring and workforce development commitments, large-scale infrastructure projects often import labor from outside the community, leaving residents to bear the environmental, traffic, and infrastructure impacts while seeing little to no meaningful economic gains. Barstow cannot afford to repeat this pattern. Doing so would deepen long-standing inequities and undermine public trust in the promise of growth. O18-6 cont'd

We urge the City Council to support the BIG project with clear, enforceable commitments that prioritize Barstow residents for employment, training, and advancement. This includes local-hire goals, paid apprenticeships, and workforce pipelines explicitly designed for residents facing employment barriers. These strategies should be developed in partnership with community colleges, school districts, and trusted local organizations such as Trin'Naz Helping Hands, which already provide trauma-informed support, case management, and workforce readiness services. O18-7

When residents earn living wages in their own city, the benefits ripple outward. Wages are spent locally, strengthening small businesses, and increasing sales and property tax revenues. Higher revenues allow the City to reinvest in safer streets, improved housing options, parks, community facilities, and public safety, visible improvements that enhance quality of life and attract additional investment. In this way, BIG can initiate a virtuous cycle of reinvestment rather than a one-time economic event.

Equally important is access to healthcare and supportive services. Many Barstow residents currently travel long distances for routine medical, behavioral health, and specialized care, an especially heavy burden for those coping with trauma or unstable housing. By increasing employment, population stability, and the local tax base, BIG can help create the conditions necessary for new healthcare and supportive service providers to establish or expand operations in Barstow. This aligns with a holistic vision of development that recognizes employment, health, and emotional well-being as inseparable.

O18-8

The decisions you make regarding the Barstow International Gateway will shape Barstow's future for decades. By pairing support for BIG with strong local-hire requirements, inclusive workforce development strategies, and formal partnerships with community-based organizations, the City Council can ensure that growth is shared, equitable, and restorative. This approach sends a powerful message: that Barstow values its people as much as its potential, and that economic progress will not come at the expense of those who have already endured the most.

Trin'Naz Helping Hands stands ready to partner with the City, developers, and workforce institutions to help make this vision a reality. Together, we can ensure that the Barstow International Gateway becomes not just a gateway for goods and commerce, but a gateway to opportunity, healing, and lasting independence for the people of Barstow.

Respectfully submitted,

Latrina Wallace
Trin'Naz Helping Hands

RESPONSE TO COMMENT LETTER O18, TRIN'NAZ HELPING HANDS

O18-1 This comment requests that the City Council include a formal action item to prioritize establishment of local-hire targets prioritizing Barstow residents, workforce development memorandums of understanding (MOUs), and require annual reporting on local employment outcomes associated with BIG. Comment has been noted and taken into consideration.

O18-2 This comment expresses the importance of BIG and the benefits of the proposed BIG Project. Comment noted. See **Consolidated Response 04** concerning general non-CEQA issues.

O18-3 This comment introduces the purpose of the Trin'Naz Helping Hands non-profit organization and connects its vision to improved employment opportunities. See **Consolidated Response 04** concerning general non-CEQA issues.

O18-4 This comment expands on challenges that Bastow residents face, and the comment has been noted. See **Consolidated Response 04** concerning general non-CEQA issues.

O18-5 This comment relates the potential for BIG to address the previously outlined challenges in the comment letter, and the comment has been noted. See **Consolidated Response 04** concerning general non-CEQA issues.

O18-6 This comment emphasizes measures necessary to help relieve the forementioned challenges and has been noted. See **Consolidated Response 04** concerning general non-CEQA issues.

O18-7 This comment requests local-hire goals, paid apprenticeships, and workforce pipelines targeted at residents in addition to partnership with local organizations, such as Trin'Naz Helping Hands. Comment has been noted and taken into consideration. See **Consolidated Response 04** concerning general non-CEQA issues.

O18-8 This comment further expands on the importance of local partnership with implementation of BIG. Comment has been noted. See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER O19

O19

City of Barstow Proposed General Plan Update and Barstow International Gateway Project

Sophia Markowska <SMarkowska@defenders.org>

Mon 1/5/2026 12:06 PM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>; Chris Heldreth <cheldreth@barstowca.org>;

1 attachments (245 KB)

Defenders_Barstow General Plan and BIG Project DEIR_1.5.26.pdf;

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Caution! This message was sent from outside your organization.

Dear Mr. Heldreth,

Please accept the attached comments on behalf of Defenders of Wildlife on the City of Barstow General Plan and Barstow International Gateway Project Draft Environmental Impact Report. Please confirm receipt of delivery.

O19-1

Thank you,
Sophia Markowska

Sophia Markowska (She/Her/Hers)
Senior California Representative

DEFENDERS OF WILDLIFE
Sacramento, CA 95822
408.603.4694 |
smarkowska@defenders.org
Facebook | X | Instagram | Blog

California Program Office
P.O. Box 401, Folsom, California 95763
www.defenders.org

January 5, 2026

Chris Heldreth, Community Development Director
City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

Delivered via email to generalplan@barstowca.org

Re: City of Barstow General Plan and Barstow International Gateway Project Draft Environmental Impact Report (SCH 2024020501)

Dear Mr. Heldreth,

Thank you for the opportunity to provide comments in response to the General Plan Update (GP or Update), Barstow International Gateway (BIG) Project and Zoning Amendments Draft and the associated Draft Environmental Impact Report (DEIR). On behalf of Defenders of Wildlife (Defenders) and our 2.1 million members and supporters in the United States, including more than 311,000 residing in California, I submit the following comments. O19-2

Defenders is dedicated to protecting all native wild animals and plants in their natural communities. To that end, Defenders employs science, public education and participation, media, legislative advocacy, litigation and proactive on-the-ground solutions to prevent the extinction of species, associated loss of biological diversity and habitat alteration and destruction.

The City of Barstow is currently undertaking a comprehensive update to its GP to comply with new State laws, respond to changing economic conditions and proactively guide long-term growth through 2048. This is its first major revision since the short-term 2015–2020 plan. The Update revisits all General Plan elements except the recently certified 2024 Housing Element, and is paired with the BIG Project, a proposed 4,300-acre modern inland port and rail logistics facility. The GP update focuses on housing and community uses in central Barstow and places future industrial growth to the west to improve compatibility, make public services more efficient and support long-term economic health. O19-3

General Plan updates are a valuable opportunity to revisit policies, objectives and goals to ensure priorities are aligned with community goals. Furthermore, the GP creates the opportunity to promote economic health while preserving and protecting wildlife and native habitats. A thriving economy and a healthy ecosystem are not mutually exclusive. In fact, an

National Headquarters | 1130 17th Street NW | Washington, DC 20036 | 202-682-9400

intact ecosystem often significantly contributes to economic well-being by providing nature-based tourism and recreation, flood protection and control, pollination and carbon storage.[1] In Barstow, wildlife conservation is a crucial aspect of a sustainable future, supporting biodiversity and strengthening the City's recreation and nature-based tourism economy.

O19-3 cont'd

Barstow is home to diverse, high-value biological resources and provides essential habitat to several special-status wildlife and plant species that may be impacted by the GP, including but not limited to the following:[2]

Table 1: Special-status species that may be found in Barstow

Common Name	Scientific Name	Status
Arroyo toad	*Anaxyrus californicus*	State Species of Special Concern
Burrowing owl	*Athene cunicularia*	State Species of Special Concern and Candidate Species for State Endangered or Threatened
Desert tortoise	*Gopherus agassizii*	Federal Threatened and State Endangered
Le Conte's thrasher	*Toxostoma lecontei*	State Species of Special Concern
Loggerhead shrike	*Lanius ludovicianus*	State Species of Special Concern
Mohave ground squirrel	*Xerospermophilus mohavensis*	State Threatened
Mojave fringe-toed lizard	*Uma scoparia*	State Species of Special Concern
Tricolored blackbird	*Agelaius tricolor*	State Threatened
Swainson's hawk	*Buteo swainsoni*	State Threatened
Western Joshua tree	*Yucca brevifolia*	Candidate Species for State Threatened

O19-4

Comments
We offer the following comments on the General Plan Update, BIG Project and DEIR.

[1] HM Treasury. 2021. *The Economics of Biodiversity: The Dasgupta Review*. https://www.gov.uk/government/publications/final-report-the-economics-of-biodiversity-the-dasgupta-review
[2] California Natural Diversity Database. Accessed 11/27/2025. https://wildlife.ca.gov/Data/CNDDB/Maps-and-Data.

Incorporating and Memorializing 30x30 Goals

In October 2020, Governor Newsom issued Executive Order N-82-20 that set a state policy goal to conserve 30 percent of California lands and coastal waters by 2030, also known as 30x30, which aligns with national and international 30x30 efforts. The Barstow region and surrounding desert landscapes have experienced substantial development and associated habitat loss over the past several decades, making proactive conservation planning particularly urgent. O19-5

The California Natural Resources Agency's *Pathways to 30x30 California* report identifies providing technical assistance for locally driven efforts to expand conservation through updates to general plans and zoning as a priority action that will help accelerate regionally led conservation.[3] Given that the State has included conservation efforts within the general plan and zoning updates as a pathway and priority action, it is warranted to include 30x30 within the Update.

Given that the State has explicitly identified general plan updates as a mechanism to advance 30x30, it is both warranted and necessary for the Barstow GP to memorialize the 30x30 goal and articulate clear conservation objectives that contribute to achieving it. Incorporating 30x30 into the GP would provide a framework for identifying priority natural areas for protection, strengthening habitat connectivity, directing development away from intact desert ecosystems and addressing region-specific barriers to meeting conservation targets. Defenders requests the GP recognize the 30x30 goal and commit the City to contributing to conservation goals. Specifically, Defenders requests that the GP map priority conservation areas within and adjacent to the planning area and identify and address challenges that hinder achieving 30x30 goals. O19-6

Wildlife Connectivity

Assembly Bill (AB) 1889, the Room to Roam Act, will require all California cities and counties to incorporate wildlife connectivity into their general plans beginning January 1, 2028. Although this requirement does not yet apply to the City of Barstow's current GP update, the legislation reflects a clear statewide priority to identify, preserve and restore wildlife movement corridors and habitat linkages. O19-7

The GP currently references wildlife corridors only once, in Policy OSC-5.4, which focuses narrowly on drainage channels and utility easements. This single, limited reference is insufficient to meet the level of detail envisioned by AB 1889, which requires jurisdictions to: O19-8

- Identify and map key wildlife corridors, connectivity areas and natural landscape blocks;
- Identify and analyze existing or planned wildlife passage features;

[3] California Natural Resources Agency. 2022. *Pathways to 30x30 California: Accelerating Conservation of California's Nature, Appendix A Regional Insights*.

- Analyze opportunities to remediate existing barriers to wildlife connectivity and restore degraded habitat and open space;
- Consider the impacts of development and the barriers caused by development to wildlife; and
- Adopt policies and measures to avoid, minimize or mitigate impacts to connectivity.

O19-8 cont'd

Integrating these components now would strengthen the GP's conservation framework, modernize Barstow's long-range planning and position the City as a proactive leader in ensuring compliance with state law. Early incorporation also provides practical benefits; it reduces the likelihood that the GP will require amendment if adoption is delayed beyond 2027, and it ensures that the City is planning for ecological resilience at the scale necessary to address long-term growth and industrial expansion, including the BIG Project.

O19-9

To ensure the GP adequately addresses wildlife movement and complies with the requirements of AB 1889 when they take effect, we recommend incorporating:

- Connectivity mapping identifying major wildlife movement corridors, habitat blocks and barriers;
- Analysis of anticipated impacts from projected land-use changes, including industrial development;
- Wildlife-friendly design and infrastructure standards;
- Restoration and barrier-removal strategies; and
- Implementation measures outlining coordination with the California Department of Fish and Wildlife (CDFW), US Fish and Wildlife Service (USFWS) and the Bureau of Land Management (BLM).

O19-10

Renewable Energy Planning

The GP would benefit from incorporating a comprehensive renewable energy planning framework that reflects a smart-from-the-start approach, consistent with Defenders of Wildlife's *Smart from the Start* report.[4] Goal OSC-8 of the GP seeks to achieve "a cost-effective and reliable energy system that promotes economic prosperity, public safety, and environmental sustainability." Thoughtful renewable energy siting directly advances all three of these objectives. Appropriately sited projects are more cost-effective because they avoid high-conflict locations, and therefore typically require fewer permits and are less likely to encounter litigation or costly construction delays. Strategic siting also enhances public safety by avoiding hazardous terrain, reducing wildfire ignition risks and minimizing conflicts with existing infrastructure and transportation corridors. From an environmental sustainability perspective, steering development toward previously disturbed or low-value

O19-11

[4] Defnders of Wildlife. *Smart From the Start: Responsible Renewable Energy Development in the Southern San Joaquin Valley*. 2012. Washington, D.C.

habitat areas significantly reduces impacts to wildlife, intact desert ecosystems and the ecological functions that support climate resilience. O19-11 cont'd

Despite the clear alignment between well-planned renewable energy development and Goal OSC-8, the GP does not currently include a strategy for renewable energy buildout or guidance on where facilities should or should not be sited. While Policy OSC-8.2 promotes the use of renewable energy sources, the GP stops short of establishing a siting framework to ensure that renewable energy development is consistent with long-term conservation goals and compatible with surrounding land uses. O19-12

To better operationalize Goal OSC-8, the City should integrate renewable energy planning into the Conservation/Open Space and Land Use Elements. Such planning should include, at minimum, parameters that:

- Identify low-conflict areas suitable for renewable energy development, prioritizing previously disturbed or altered lands;
- Map and avoid biologically sensitive areas, including core habitat, wildlife corridors, riparian features, rare plant communities and areas supporting listed or special-status species;
- Evaluate cumulative impacts of renewable energy and transmission buildout; and
- Require project-level early coordination with CDFW, USFWS, BLM and Tribal Nations.

O19-13

Defenders of Wildlife is available as a resource to assist the City in developing a smart-from-the-start renewable energy siting framework, including habitat analyses, connectivity considerations and best practices for avoiding, minimizing and mitigating impacts. Integrating such planning now would significantly strengthen the GP's ability to guide responsible energy development while upholding the conservation values and priorities reflected in Goal OSC-8. O19-14

Increase in Groundwater Usage

The GP anticipates additional development and associated population growth, which may increase reliance on groundwater connected to the Mojave River system. The DEIR concludes that groundwater supply impacts would be less than significant; however, the analysis does not fully address potential effects on downstream surface water resources, particularly in Afton Canyon, where Mojave River flows and associated groundwater provide essential water sources for desert bighorn sheep and other wildlife. O19-15

Groundwater pumping in the Barstow area can influence Mojave River flows and groundwater-dependent ecosystems downstream. The DEIR should include a more robust analysis of how buildout under the GP may affect groundwater levels and baseflows in Afton Canyon, including the effects of existing and reasonably foreseeable regional pumping. O19-16

Defenders recommends that the City evaluate the hydrologic connection between Barstow-area groundwater use and Mojave River surface flows in Afton Canyon, disclose any potential reductions in water availability for wildlife and riparian habitat and adopt policies or mitigation measures to ensure that the GP's increased water demand does not diminish surface water in the Afton Canyon. O19-16 cont'd

Incorporate a No-Net-Loss Policy for Wildlife Habitat

Goal OSC-5 seeks to achieve the "preservation and conservation of the desert ecosystem and regional biological diversity through sustainable practices in open space design and management." However, the GP does not currently include a policy framework requiring no-net-loss of habitat. O19-17

Defenders recommends the GP include an explicit no-net-loss of important wildlife habitat policy. In cases where habitat loss cannot be fully avoided, the City must commit to fully mitigating habitat loss at biologically appropriate ratios, developed in coordination with trustee wildlife agencies. A no-net-loss standard is essential to ensuring that the City's long-term growth and development do not result in declines in already limited and fragmented desert ecosystems. O19-18

Desert Tortoise Surveys

According to the DEIR, desert tortoise surveys were conducted for the BIG Project between October 16, 2021, and October 16, 2024. USFWS guidance states that if survey data is over a year old, the project proponent should contact USFWS to assess the circumstances under which the data was collected to determine whether additional surveys would be appropriate. The DEIR fails to mention any discussions with USFWS to determine if additional surveys are necessary. We recommend new desert tortoise protocol-level surveys be conducted that adhere to USFWS guidance[5], within one year prior to ground disturbance to determine species presence. O19-19

Raven Management Plan for the BIG Project

To ensure meaningful public participation and informed decision-making, all plans proposed as mitigation must be included in the Draft EIR itself. CEQA's core purpose is to disclose environmental consequences to decision makers and the public before a project is approved. As a recent court explained, "[t]he point of an EIR is to inform decisionmakers and the public about the environmental consequences of a project before approving it." When key mitigation plans are deferred or omitted from the DEIR, neither the public nor decision-makers can fully evaluate whether the proposed mitigation is adequate, feasible or enforceable. For this reason, any such plans must be incorporated into the DEIR, not developed later, so they may undergo proper public review and comment consistent with CEQA's intent. O19-20

[5] US Fish and Wildlife Service. 2019. *Preparing for any action that may occur within the range of the Mojave desert tortoise (*Gopherus agassizii*)*.

We specifically request the inclusion of a Raven Management Plan. Ravens are well-documented predators of desert tortoise and represent a barrier to the species' recovery. Solar facilities and associated infrastructure frequently increase raven presence by introducing new perching, roosting and nesting structures. Mitigation Measure BIG BIO-15 states that a Raven Management Plan shall be prepared prior to the start of construction mobilization activities and identifies measures that ***may*** be included in that plan. However, identifying potential measures is not a substitute for providing a complete plan. To meet CEQA's disclosure requirements, the Raven Management Plan itself must be included within the DEIR. Without this plan available for review, the public cannot assess whether the proposed mitigation is adequate to reduce impacts to a less-than-significant level, nor can decision-makers make a fully informed determination about the Project's environmental consequences. O19-21

Conclusion

Thank you once again for the opportunity to provide comments on the Barstow General Plan Update, Barstow International Gateway Project and Zoning Amendments Draft and the associated DEIR. Defenders looks forward to reviewing the Final General Plan and EIR for the update and requests to be notified when it is available. Please feel free to contact me with any questions. O19-22

Respectfully submitted,

Sophia Markowska

Sophia Markowska
Senior California Representative
SMarkowska@defenders.org

RESPONSE TO COMMENT LETTER O19, DEFENDERS OF WILDLIFE

019-1 Commenter raises some concerns about the Draft EIR's analysis that are best addressed by sharing technical and scientific information, which is provided below. See **Consolidated Response 04** concerning general non-CEQA issues.

019-2 See **Consolidated Response 04** concerning general non-CEQA issues.

019-3 See **Consolidated Response 04** concerning general non-CEQA issues.

019-4 This comment introduces a list of special-status wildlife and plant species that may occur in the City of Barstow. The list includes nine wildlife species and one plant species with accurate conservation statuses for each. However, the comment does not include that arroyo toad (*Bufo californicus*) is also a federal Endangered Species, and that tricolored blackbird (*Agelaius tricolor*) is also a State Species of Special Concern. This comment does not raise any specific issues or questions on the environmental analysis provided in the proposed General Plan, Barstow International Gateway (BIG) Project, or Draft Environmental Impact Report (Draft EIR). The City appreciates the following comments that Defenders of Wildlife have on the GP Update, BIG Project, and Draft EIR. See **Consolidated Response 04** concerning general non-CEQA issues.

019-5 The 30x30 Initiative/Executive Order N-82-20 is a statewide goal that is to be led by the California Natural Resources Agency and the established California Biodiversity Collaborative. The Executive Order does not require General Plans to directly address this goal. While California Senate Bill 1402 (introduced in the 2023-2024 legislative session) would have required state entities to consider the 30x30 goal when preparing and implementing plans and regulations, the proposed legislation failed to advance further and is no longer active.

019-6 The commentor requests that the proposed General Plan recognize the 30x30 goal and commit the City to contributing to conservation goals. Specifically, the commenter requests that the GP map priority conservation areas within and adjacent to the planning area and identify and address challenges that hinder achieving 30x30 goals.

The proposed General Plan contains a number of policies that direct the City to coordinate with private and public entities to preserve natural lands and high value habitat, with notable policies in Goal OSC-2 and OSC-5 of the Open Space and Conservation Element. Examples of policies include:

> **Policy OSC-2.1 Regional Coordination on Open Space.**
>
> Coordinate with public agencies and nongovernmental entities to create permanent open space areas that protect natural resources and/or function as a buffer against natural hazards or between incompatible land uses.
>
> **Policy OSC-2.2 Residential Clustering.**
>
> Encourage new residential development to cluster housing units in order to reduce the consumption of undeveloped land, maximize open space, preserve natural and scenic

resources, conform to natural topography/grade, and/or reduce exposure of structures to natural hazards.

Policy OSC-2.3 Land Swaps.

Coordinate with public agencies and nongovernmental entities to pursue land swaps in order to grow responsibly and sustainably manage and conserve open space and natural resource areas.

Policy OSC-5.2 Coordination to Protect Resources.

Coordinate with public and nongovernmental agencies to protect high value habitat and protected wildlife through the establishment, restoration, and conservation of high-value habitat areas.

Policy OSC-5.3 Land Banking.

Support the proactive assemblage of lands to protect high-value habitat and protected wildlife and facilitate development through private or public mitigation banking or other appropriate conservation measures. Require public and private conservation lands or mitigation banks to ensure that easement and fee title agreements provide funding methods sufficient to manage the land in perpetuity.

Policy OSC-5.4 Corridors.

Coordinate with public and nongovernmental agencies to plan, design, and maintain drainage channels and utility easements to provide wildlife corridors and connectivity between open space areas in the community and surrounding desert.

Policy OSC-5.5 New Development.

Require new development to minimize impacts to existing high-value habitat and protected wildlife to the extent practicable. Require revegetation of disturbed natural habitat areas with native or drought-tolerant noninvasive naturalized species.

See **Response O19-5**. See also **Consolidated Response 04** concerning general non-CEQA issues.

019-7 As stated by the commenter, the statutory provisions enacted through Assembly Bill 1889 (Friedman, 2024) are required upon an update of the Conservation Element that takes place on or after January 1, 2028. The Draft General Plan is anticipated to be adopted in 2026. The City will address the requirements of state law upon the next update of its Open Space and Conservation Element that takes place on or after January 1, 2028. Also see **Response O25-3.**

019-8 See **Response O19-5** and **O19-7**.

019-9 See **Response O19-8**.

019-10 See **Response O19-8**.

019-11 The commentor advocates that the proposed General Plan would benefit from incorporating a comprehensive renewable energy planning framework that steers development toward previously disturbed areas with low habitat value. The Draft General Plan contains a number of policies that direct Barstow to coordinate with private and public entities to preserve natural lands and high value habitat, with notable policies in Goal OSC-2 and OSC-5 of the Open Space and Conservation Element. These policies would be considered and would apply when evaluating where to site and approve proposed energy facilities.

019-12 Thank you for your comment. While the comment does not raise any issue regarding the Draft EIR, it is provided in the Final EIR for the decision makers.

019-13 Thank you for your comment. While the comment does not raise any issue regarding the Draft EIR, it is provided in the Final EIR for the decision makers.

019-14 Thank you for your comment. While the comment does not raise any issue regarding the Draft EIR, it is provided in the Final EIR for the decision makers.

019-15 Golden State Water Company (GSWC) provides water to the City of Barstow. However, the Mojave Water Agency (MWA) acts as the Watermaster, monitoring and verifying water production within the entire, adjudicated Mojave Basin Area. MWA prepares the Urban Water Management Plan (UWMP) that includes Golden State Water (GWSC) as one of the 11 urban retail suppliers. See pages 5.17-73 and 5.17-74 of Section 5.17 Utilities and Service Systems of the Draft EIR. Table 5.17-20, *Projected Water Supply and Proposed General Plan Demands,* shows that in 2048, there would be a surplus water supply of 6,650 acre feet. Additionally, see page 5.17-39 of Section 5.17 Utilities and Service Systems of the Draft EIR which states that, "GSWC Barstow uses only Centro Subarea water supplies to serve the GSWC Barstow system. Water levels in the Centro Subarea have been stable, showing seasonable variability and declines during dry years, but generally recovering during wet periods. The Centro Subarea has annual allocations determined by the Watermaster's assessments. Additionally, GSWC supplements its supply with surplus water from prior years. Collaborative efforts with MWA are essential to enhancing the groundwater basin reserves and complying with regulations outlined in the Mojave Basin Adjudication, which governs the water rights." The City does not solely rely on groundwater, but rather, a combination of water supply sources such as imported water, surface water, and recycled water. Relying on multiple sources of water would ensure that groundwater supplies are not diminished. MWA has told the City that adjudication does not distinguish water allocations specifically between human uses and wildlife.

019-16 See **Response O19-15**.

019-17 Goal OSC-5 establishes a requirement to preserve and conserve the desert ecosystem. The policy framework follows with a requirement to follow state and federal law, which already contains no net loss for wetlands (General Plan Policy OSC-5.1) and establishes a communication and collaboration requirement including state, federal, tribal, and non-governmental agencies to protect high-value habitat. (General Plan Policy OSC-5.2). New development is required to shoulder the mitigation of its impacts without affecting military

or other federal lands (Policy OSC-5.6). At a programmatic level, the City believes it has set in place a policy framework that adequately addresses the potential future impact of development, and no further modification to the policy is necessary.

019-18 See **Response O19-17**.

019-19 Various protocol-level presence/absence surveys have been conducted on the BIG footprint from 2021 to 2025; see **Draft EIR Appendix 5.4 BIG-1 Biological Resources Technical Report Table 6: Summary of Surveys Conducted for BIG** (page 33). In general, the BIG project site has been surveyed at least twice since 2021. Additionally, existing obstructions such as Main Street along BIG's southern boundary, as well as the BNSF railway bisecting a majority of the project would likely prevent the movement of any new undocumented tortoise onto the project site. Therefore, the results of the protocol presence/absence surveys conducted from 2021 to 2024 are sufficient to determine the estimated population of tortoise on site. Accordingly, the disclosure of BIG's potential impacts on desert tortoise per the Draft EIR analysis is also sufficient and does not require surveys to be repeated for substantiation.

Additionally, the applicant has been coordinating with USFWS and CDFW since 2022, relaying survey results and potential impact and mitigation concerns. During this ongoing coordination, USFWS has not recommended repeating protocol presence/absence surveys following the completion of surveys in the Fall of 2024. USFWS still has the potential to recommend additional presence/absence surveys as a part of the federal Section 7 Formal Consultation process; however, additional surveys are not required for the purposes of impact disclosure and mitigation measure development per CEQA. As required by **MM BIG BIO-13** and **MM BIG BIO-14**, pre-construction surveys would be conducted in accordance with USFWS protocols and guidance prior to project implementation. These surveys are exhaustive to allow for detection and translocation of all desert tortoises from the BIG footprint.

019-20 The Draft EIR adequately discloses potential impacts and environmental consequences; see **Draft EIR Appendix 5.4 BIG-1**. This comment acknowledges the importance of disclosing impacts, per the example statement that is referenced by the commenter but does not argue that impacts are not adequately disclosed in the Draft EIR. Although the mitigation plans as prescribed by the measures detailed in **Draft EIR Appendix 5.4 BIG-1 Section 8.0: Mitigation Measures** are not included in the Draft EIR, their requirements and detailed plan elements are discussed and included in the Draft EIR mitigation measures (**MM BIG BIO-15**, page 5.4-76 through 5.4-77) which in turn would become BIG Project conditions of approval. Therefore, the Draft EIR contains sufficient information to evaluate BIG mitigation.

019-21 See **Response O19-20** concerning the Draft EIR's disclosure of impacts related to raven impacts on desert tortoise, which specifically includes a discussion of the potential impacts related to perching, roosting, and nesting structures during project construction. **MM BIG BIO-15** also addresses these impacts by detailing potential elements of the mitigation plan that would avoid, minimize, and mitigate such impacts, including the implementation of a Raven Management Plan and participation in the interagency Raven Monitoring and Management Program. Listing components of a compliance plan, success criteria, and

performance standards in a Draft EIR mitigation measure as opposed to attaching the entire plan is consistent with CEQA precedent and considered an adequate form of mitigation to reduce impacts to a less than significant level if sufficient detail is provided. In this case, the performance standards and success criteria are clearly spelled out in **MM BIG BIO-15**, "avoid attracting common ravens to BIG by creating food or water subsidies, perch sites, roost sites, or nest sites." The Plan would be held to these standards, and details for achievement are outlined further in the mitigation measure. Additionally, CDFW and USFWS who regulate desert tortoise under CESA and FESA would have review authority over the Raven Management Plan prior to its finalization through their respective permitting processes. Raven impacts, as well as other direct and indirect impacts, have the potential to result in take of desert tortoise; see the Biological Resources Technical Report (**Draft EIR Appendix 5.4 BIG-1 Section 6.0: Impact Analysis).** Take activities would be authorized through a CESA ITP and Biological Opinion (BO), which are reviewed and issued by CDFW and USFWS, respectively, for compliance with CESA and the federal ESA. CDFW and USFWS's review, approval, and issuance of the CESA ITP and BO (and associated Raven Management Plan) would be clarified in updated **MM BIG BIO-13**, **MM BIG BIO-14**, and **MM BIG BIO-16**.

See **Responses S8-24**, **S8-25**, and **S8-26** for the updated text to **MM BIG BIO-13**, **MM BIG BIO-14**, and **MM BIG BIO-16** (respectively) that would be incorporated into the EIR

019-22 Thank you for your comment. See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER O20

O20

SILVER LAKES ASSOCIATION
P.O. BOX 179 HELENDALE, CA. 92342 (760) 245-1606

RECEIVED
JAN 0 8 2026

December 30, 2025

Please accept the following comments as concerns regarding the proposed BIG project. As a large scale Homeowner Association consisting of approximately 3200 homes, it was disappointing that the DEIR did not take into consideration any potential negative impact that a project of this magnitude may adversely impact our community. From community safety, accessibility, and overall quality of life for thousands of residents, including teachers, health professionals, BNSF employees, and other critical workers who commute throughout the high desert, this project will have some significant impact on the Silver Lakes / Helendale area. O20-1

A major concern is the at-grade crossing at Vista Road, which has been an ongoing safety issue. Vista Rd is the primary ingress and egress point for a majority of our residents to access the high desert area. For years, we have experienced frequent and extended delays by trains either stopping across or traversing the Vista Rd crossing. This has delayed emergency personnel, including EMS and law enforcement, from entering into or exiting out of Silver Lakes in a timely manner. Additionally, delays in crossing the railroad tracks on Vista Rd has created serious traffic issues with vehicles lining up onto National Trails Hwy., which is not adequately designed to address this issue, thus creating serious safety concerns. We have already seen an increase in the overall train length and unknown future increase in the number of containers moving in and out of the BIG project between Barstow and the Inland Empire / Port of Los Angeles creating increased train traffic. O20-2

Another area of concern is the impact of increased vehicular traffic coming thru Silver Lakes enroute to BIG as wells as an overall traffic increase on National Trails. Over the past several years, National Trails has seen a significant increase in traffic fatalities. This highway is not designed to handle increased use of commercial vehicles and commuter traffic required to support the project. Commuter and commercial traffic west of Interstate 15 may utilize Highway 395 to access National Trails by going thru Silver Lakes enroute to BIG. Our community does not have adequate infrastructure to address this potential impact. O20-3

These are just some of the negative impacts the BIG project will have on the residents of Silver Lakes / Helendale. It is unfortunate the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. We respectfully request that the DEIR and the Final EIR clearly address these issues as well as other issues identified by Silver Lakes / Helendale residents, including with supporting mitigation factors, such as an above grade crossing currently under review by San Bernardino County. O20-4

Thank you for considering these concerns along with several others concerns identified by our community members in their own personal responses to the DEIR. We respectfully request that Silver Lakes / Helendale be included in the environmental impact analysis to ensure appropriate mitigation measures are implemented to maintain safe access to our community.

Sincerely,

Silver Lakes Association Board of Directors - Jeff McKellar, President

RESPONSE TO COMMENT LETTER O20, SILVER LAKES ASSOCIATION

O20-1 Commenter raises some concerns about the Draft EIR's analysis that are best addressed by sharing technical and scientific information, which is provided in the Consolidated Responses referenced below. See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-01** concerning the geographic scope of the environmental analysis and definition of study area, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 08-03** concerning increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning increased rail activity's effects on emergency response delays at the Silver Lakes/Helendale Community at-grade crossings (i.e., for paramedics/ambulances, fire protection, and police protection), **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning increased rail activity's effects on traffic delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at the Silver Lakes/Helendale Community at-grade crossing, and **Consolidated Response 06-04** concerning quality of life.

O20-2 CEQA also does not require mitigation measures or consideration of alternatives for preexisting environmental problems, which are assumed as part of the baseline conditions.[115] As a result, CEQA does not require BIG to mitigate existing environmental conditions or impacts that are not caused or worsened by BIG. CEQA is concerned with a project's incremental effects on the environment, and mitigation is required only for significant environmental impacts attributable to BIG itself. (State CEQA Guidelines, § 15126.2; § 15126.4.) BNSF prepared the *Analysis of At-Grade Crossing Delay for BIG* (At-Grade Crossing Evaluation). See **Consolidated Response 10-01** concerning the effects of increased rail activity due to BIG on emergency access at the Silver Lakes/Helendale Community at-grade crossing, **Consolidated Response 10-02** concerning increased rail activity's effects on traffic delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 10-03** concerning increased rail activity's effects on emergency response delays at the Silver Lakes/Helendale Community at-grade crossings (i.e., for paramedics/ambulances, fire protection, and police protection), **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, and **Consolidated Response 08-02** concerning the increased rail activity's effects on traffic queues.

O20-3 As discussed in **Draft EIR Appendix 5.15 BIG-2: Level of Service Assessment – Transportation Analysis**, the level of service (LOS) assessment study area was determined using the San Bernardino County Transportation Impact Study Guidelines (County TIS Guidelines) (County of San Bernardino, 2019) and includes National Trails Highway (Main Street) from Hinkley Road to Barstow Road. Along National Trails Highway west of Hinkley Road, BIG is forecast to add up to 31 passenger car equivalent (PCE) peak hour trips under Opening Year 2028 Plus BIG conditions and up to 46 PCE peak hour trips under Horizon Year 2048 Plus BIG conditions.

[115] In re Bay-Delta Programmatic Envtl. Impact Report Coordinated Proceedings (2008) 43 Cal.4th 1143, 1168.

Therefore, consistent with the County TIS Guidelines, National Trails Highway west of Hinkley Road was not included in BIG's LOS assessment because BIG is forecast to add less than 50 PCE trips during the peak hour.

Further, BIG is not forecast to add any heavy-duty truck trips to National Trails Highway west of Country Club Drive; trucks are forecast to use designated truck routes (**Draft EIR Appendix 5.15 BIG-2**, pages 146-210).

As discussed above, the roadways near the Silver Lakes/Helendale community are outside the LOS assessment study area. Therefore, as shown on **Draft EIR Figure 3-2: Local Vicinity Map** (page 3-4), and summarized in **Draft EIR Appendix 5.15 BIG-2 Table 2**, BIG does not propose any improvements near the Silver Lakes/Helendale Community. See also **Consolidated Response 05** concerning feasible and enforceable mitigation measures.

O20-4 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-01** concerning the geographic scope of the environmental analysis and definition of study area, **Consolidated Response 05** concerning feasible and enforceable mitigation measures, and **Consolidated Response 10-06** concerning construction of a grade separation (overpass) or an alternative access route in the Silver Lakes/Helendale Community.

COMMENT LETTER O21

Letter and responses are included as separate file.

COMMENT LETTER O22

O22

Comments on City of Barstow General Plan and BNSF Barstow International Gateway (BIG) Draft Environmental Impact Report (SCH No. 2024020501)

Adriana Rizzo <adria.i.rizzo@gmail.com>

Mon 1/12/2026 2:32 PM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

1 attachments (844 KB)

BIG EIR Comment Letter CER.pdf;

[NOTICE: THIS IS AN EXTERNAL EMAIL]
Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!.

Caution! This message was sent from outside your organization.

Dear Mr. Heldreth,

See attached comments regarding the Barstow International Gateway Draft Environmental Impact Report from Californians for Electric Rail. O22-1

Sincerely,
Adriana Rizzo
Founding Member
Californians for Electric Rail



January 12th, 2026

Chris Heldreth
Community Development Director
City of Barstow
220 East Mountain View Street, Suite A
Barstow, California 92311
generalplan@barstowca.org

Re: Comments on City of Barstow General Plan and BNSF Barstow International Gateway (BIG) Draft Environmental Impact Report (SCH No. 2024020501)

Dear Mr. Heldreth,

Californians for Electric Rail is an all-volunteer association advocating for cleaner and more abundant passenger and freight rail via rail electrification. We have members throughout the state of California, including the South Coast Air Basin (SCAB), some of whom live near freight lines and/or highways that will be impacted by the BIG.

The Draft Environmental Impact Report for the Barstow International Gateway (BIG) finds significant air quality impacts for rail yard operations, yet recommends no mitigations related to the largest sources of emissions - trains and trucks. The DEIR dismisses electric trains and trucks as infeasible based on justification that does not hold up to scrutiny. O22-2

The DEIR finds that the BIG would increase criteria pollutant emissions in the Mojave Desert Air Basin area, considerably above acceptable thresholds, even with mitigations (Table 5.3-26). In particular, rail corridor emissions within the local area would significantly increase. Truck emissions are also projected to be substantial, with truck emissions alone nearly reaching MDAB thresholds. O22-3

Despite the DEIR's dismissal of truck electrification as infeasible, an increasing number of battery electric and other zero-emissions powertrain trucks are already in service in the SCAB to serve customers throughout the region. These trucks are able to operate from ports, logistics centers/warehouses, railyards, and other customers in the region with routes that span dozens of miles per trip. With one of the stated goals of BIG being to provide a consolidated location for easy transloading of goods directly on the site, it would be entirely within the range capabilities of the existing zero-emissions options to serve the Project, and there will undoubtedly be improvements in the future such that it could become more feasible for trucks in the wider High Desert area and even beyond to be able to make journeys to BIG on a charge. Therefore, it is imperative that at a bare minimum, the buildout of BIG provides spare conduit and switchgear O22-4

connections for a robust collection of charging infrastructure to be installed at later dates in the future. O22-4 cont'd

The DEIR's dismissal of battery switcher locomotives also rests on erroneous assumptions. While there have not been any battery locomotives produced over 2.4 MWh, several manufacturers offer them along with 1.2-1.4 MW chargers. Smart chargers with dynamic load sharing are already proven in the road vehicle space, and that same technology could be used to allow charging to share a limited capacity to start with and grow as the fleet of zero emissions battery equipment grows and additional power projects are completed. Decreasing the size of each shift but with more shifts can also reduce the amount of vehicles needing to charge at once. Finally, batteries could be installed between the grid and chargers to smooth demand and provide resilience in case of a grid outage. As a large industrial customer, BNSF would not be subjected to the same level of dynamic pricing consumers face. Battery technology continues to improve, and despite concerns stated in the DEIR about commercial availability, dozens of battery switcher demonstration projects have launched around the country with promising results[1], including by Pacific Harbor Line, which operates at the ports, and by BNSF itself in 2022[2]. Outcomes of BNSF's battery switcher trial are highly relevant to the Project yet are omitted from the DEIR - why? While the DEIR discusses use of Tier 4 switchers, it is unclear whether this is a legally-binding commitment. The Final EIR should include battery electric switcher operations as a mitigation. O22-5

Additionally, while the DEIR finds that net emissions in the South Coast Air Basin (Table 5.3-25) would decrease, the decrease is entirely attributable to an inferred reduction in truck emissions. While reduced truck activity and rail modal shift would be an ideal outcome, that outcome is far from certain and subject to complex economic factors and operational choices by BNSF that are out of the scope of the Project. If BIG has no impact on truck modal shift, the induced rail corridor emissions change would exceed SCAB thresholds for NOx by 2x, according to the DEIR's own calculations. O22-6

The DEIR evaluates and erroneously dismisses various zero emissions alternatives for line haul locomotives, including the use of overhead catenary (OCS). However, this is a critical error and a missed opportunity to address significant impacts of the Project, particularly on the path from the San Pedro Bay Ports to the BIG site itself in Barstow. Contrary to the characterization provided in the DEIR, electrification is a proven solution for freight and is used in US-analogue applications in Russia, South Africa, and India (which has recently completed an undertaking to electrify virtually their entire network over the last decade[3] and runs double-stack container O22-7

[1] "Watco Electric Switchers Receive High Marks", *Railway Age*, 2023
https://www.railwayage.com/freight/short-lines-regionals/watco-electric-switchers-receive-high-marks/
[2] "Progress Rail to Supply BNSF with Zero Exhaust Emission Locomotives to Demonstrate in Southern California" Progress Rail, 2022
https://www.progressrail.com/en/Company/News/PressReleases/ProgressRailtoSupplyBNSFwithZeroExhaustEmissionLocomotivestoDemonstrateinSouthernCalifornia.html
[3] Mission 100% Electrification: Powering the Future of Indian Railways

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trains on flatcars[4] which makes their double-stack trains appreciably taller than American double-stack trains), and by domestic Class I railroads historically (e.g. Milwaukee Road, Conrail). O22-7 cont'd

It is perplexing to see the DEIR claim (p. 5.3-110) that "[c]atenary lines are impractical since this would involve laying thousands of miles of electrified lines the distance of the rail" given the proposal that some BIG traffic would be served via a shuttle service from the Ports using a dedicated fleet of Tier 4 locomotives (p. 3-54). Though it certainly is true that the entirety of the BNSF network spans tens of thousands of miles, that is not relevant for the Project. The Ports are not "thousands of miles" from Barstow, they are less than 200, a far more manageable and realistic distance for the installation of catenary. In previous studies by the Southern California Regional Rail Authority (Metrolink)[5] and SCAG,[6] Barstow has been identified as a logical endpoint for electrification of the BNSF Southern Transcon in the Southern California region because it is a location where rail operations already frequently add or remove locomotives from trains as they traverse the Cajon Pass. Thus, adding or removing electric locomotives there would not represent a substantial departure from current BNSF operations. However, those studies considered the case of electrification under the assumption that the traffic would be leaving the region. O22-8

In fact, BIG *bolsters* the case for electrification of the BNSF Southern Transcon from the Ports all the way to Barstow as Barstow would be the destination of Project trains, not merely a place where locomotives would be added or removed. The DEIR states that 15% of the BIG's containers would be delivered via a dedicated shuttle service to the ports using a dedicated fleet of Tier 4 locomotives. Providing this shuttle service using locomotives powered electrically via overhead contact system (OCS) rather than Tier 4 would cut GHG emissions and criteria pollutants in both SCAB and in the MDAB by at least 15%. Short-haul freight shuttle trains between the Ports of LA/Long Beach and the Barstow area are a practical use-case for a local fleet of 'captive' electric locomotives. Thus, zero-emissions locomotives are in fact a feasible mitigation for the air quality and GHG impacts of the Project and their use and inclusion needs to be studied in the EIR. O22-9

Additionally, it would be extremely beneficial for BNSF to also consider taking advantage of the provision of catenary from Barstow to the Ports to greatly reduce their emissions for all trains in the region by using locomotives that could operate in dual-modes, either battery-catenary (charging in motion on electrified segments, with smaller batteries than the pure battery concept discussed in the DEIR) or diesel-catenary. This would better amortize both the expense of catenary installation and maintenance as well as provide a broader use for the pool of locomotives for the captive fleet which would provide a more versatile and useful fleet. O22-10

[4] "WAG9 VS WAG12 WITH DOUBLE STACK CONTAINER INDIAN RAILWAYS", YouTube.com. https://www.youtube.com/watch?v=3BbdDzkMYJs
[5] https://libraryarchives.metro.net/dpgtl/Metrolink/1992-Findings-SoCal-Accelerated-Rail-Electrification.pdf
[6] "Analysis of Freight Rail Electrification in the SCAG Region", SCAG. https://scag.ca.gov/sites/default/files/2024-05/crgmsais_-_analysis_of_freight_rail_electrification_in_the_scag_region.pdf

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Rather than the thousands of miles of catenary claimed by the DEIR, this service would require substantially less. Electrifying the 22 mile Alameda Corridor[7] from the ports to Los Angeles, the 70-mile San Bernardino Subdivision from Los Angeles to San Bernardino[8], and the 81.4-mile Cajon Subdivision from San Bernardino to Barstow yard[9] would allow 100% zero-emissions operations of the proposed shuttle service using only 171 route miles of overhead catenary. Additional extensions of catenary to Union Pacific's Yermo railyard and BNSF's Newberry sidings would provide a convenient location allowing additional space for interchanging, and staging, diesel and electric locomotives, allowing transfer to diesel for long-haul transport on unelectrified lines (i.e. the rest of the BNSF network). In these areas, there is ample vacant land along the tracks for new staging yards and siding tracks, which would allow locomotive interchanges and additional block swaps while avoiding congestion at BIG and the existing Barstow yard. Future electrification along the BNSF Mojave Subdivision towards Hinkley, Boron and beyond is also possible, which would expand zero-emissions operations and provide further emissions reductions. O22-11

Of these segments, BNSF has already agreed to allow the California High-Speed Rail Authority to install 25 kV overhead catenary over about 22 route miles of track between downtown Los Angeles (Redondo Junction) and Fullerton. This infrastructure will be publicly financed and owned but could be utilized by BNSF at low cost. Electrification of the remainder of the San Bernardino Subdivision, which is shared right of way with Metrolink and Amtrak, is planned for passenger rail in the 2024 State Rail Plan[10], and with BNSF's participation, a similar cost-sharing agreement could be reached. The Alameda Corridor is publicly owned, enabling cost and risk sharing with public support. State and local funding (e.g. the Carl Moyer Program) is also available for zero-emissions rolling stock, further reducing costs to BNSF. O22-12

California is emerging as a hub of 25 kV overhead catenary rail electrification development in the United States. In 2024, Caltrain began carrying passengers in Stadler trainsets under 25 kV OCS between San Francisco and San Jose, on track shared with Union Pacific freight trains. Union Pacific also operates freight trains on Metrolink's Valley Subdivision corridor, which will host CHSRA 25 kV OCS wires between LA and Burbank in the future. Construction is slated to begin soon on 25 kV OCS electrification for both Brightline West (between Southern California O22-13

[7] "Electrification of the Alameda Corridor and the San Pedro Bay Port Rail Network- Concept Paper", August 2023
https://calelectricrail.org/wp-content/uploads/2024/11/POLA-Alameda-Corridor-Electrification-concept-paper-BY-2023.08.29.pdf
[8] "A Vision of Electrified Rail in Southern California: Los Angeles to the Inland Empire- plus appendices", August 2023
https://calelectricrail.org/wp-content/uploads/2024/11/SoCal-IE-rail-electrification-BY-appendices-2023.08.29.pdf
[9] "Electrification of the BNSF Cajon Subdivision- plus appendices", January 2025
https://calelectricrail.org/wp-content/uploads/2025/04/Cajon-Sub-OCS-electrification-appendices-BYanity-2025.01.19.pdf
[10] 2024 California State Rail Plan, California Department of Transportation, 2024
https://dot.ca.gov/-/media/dot-media/programs/rail-mass-transportation/documents/california-state-rail-plan/2024-ca-state-rail-plan-a11y.pdf

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and Las Vegas) and the initial operating segment of the California High Speed Rail project in the Central Valley.



2050 vision for passenger rail electrification, 2024 California State Rail Plan[10]

O2-13 cont'd

There is a wealth of global experience and proven off-the-shelf technology that the U.S. can utilize to address its transportation issues, particularly for rail electrification. While U.S. manufacturing capacity needs to be developed for locomotives and EMU rolling stock and OCS infrastructure, US railroads can tap international engineering, construction and management expertise; many technical papers and books on the latest OCS construction techniques are widely available.The economics and energy efficiency of OCS heavy/frequent freight rail electrification has proven in many applications around the world as having very positive return on investment, in large part due to a substantial reduction in operating and maintenance costs.

O2-14

The operating and maintenance cost reduction is typically great enough long-term to offset the cost of OCS electrification while also driving improved bottom line results for rail operators (public and private). In terms of overall energy efficiency, conventional electric trains are three times more efficient than diesel or hydrogen, and about 1.2 times more efficient than battery-only trains[11]. According to a March 12, 2023 *Railway Age* article by Mike Iden[12], total 'input-to-wheel' energy conversion locomotive efficiency was calculated to be: O22-15

- Catenary wire electric- 90%
- Catenary wire electric with battery tender- 86%
- Battery electric- 77%
- Green hydrogen- 39%
- Diesel with battery tender- 36%

Electric locomotives are associated with lower fuel, maintenance, and other operating costs. Siemens and Alstom are mass producing heavy-duty 25 kV electric freight locomotive drivetrains in India that could be adapted to North American standards. Due to their mass production, it would be easier to find parts, maintenance/repair support from the manufacturers. Two-section Alstom WAG-12 with 12,000 hp (2 x 6,000 hp) or Siemens single-section 9000 hp (6.7 MW) electric locomotive drivetrains developed for Indian Railways should offer the equivalent performance needed by US freight railroads. Four of the 9000 hp units would translate to 26.8 MW total max draw per train (or assuming five rounded to an average max load of about 30 MW). European and Asian electric locomotive drivetrains will need to be converted to American frame/trucks. Frames or other components could be repurposed from existing diesel-electric freight locomotives[13]. O22-16

Electrifying freight operations on the BNSF Cajon and San Bernardino subdivisions will likely require hundreds of MW of 'at-wheel' electric power, provided by traction power substations each with 150-200 MVA capacity. Efficient and cost-effective utilization of existing power grid infrastructure is key for economical rail electrification, so it is best for new traction power substations to be built as close as possible to existing major electric utility substations. Thankfully many existing large electric utility substations exist along the BNSF mainlines between LA, Fullerton, Riverside, San Bernardino, and the Barstow area. For example, five major existing electric utility substations exist along the Cajon Subdivision fortuitously happen to be adjacent to the track (shown on map below), and connected to existing large-scale solar energy generation and battery energy storage capacity via the regional grid. Californians for Electric Rail has published a Google Map showing existing electric utility substations adjacent to railroad tracks in Southern California, including BNSF's main lines[14]. While the substations may require some upgrades, and new adjacent traction power substations built next to them, the O22-17

[11] https://www.rssb.co.uk/en/research-catalogue/CatalogueItem/T1145

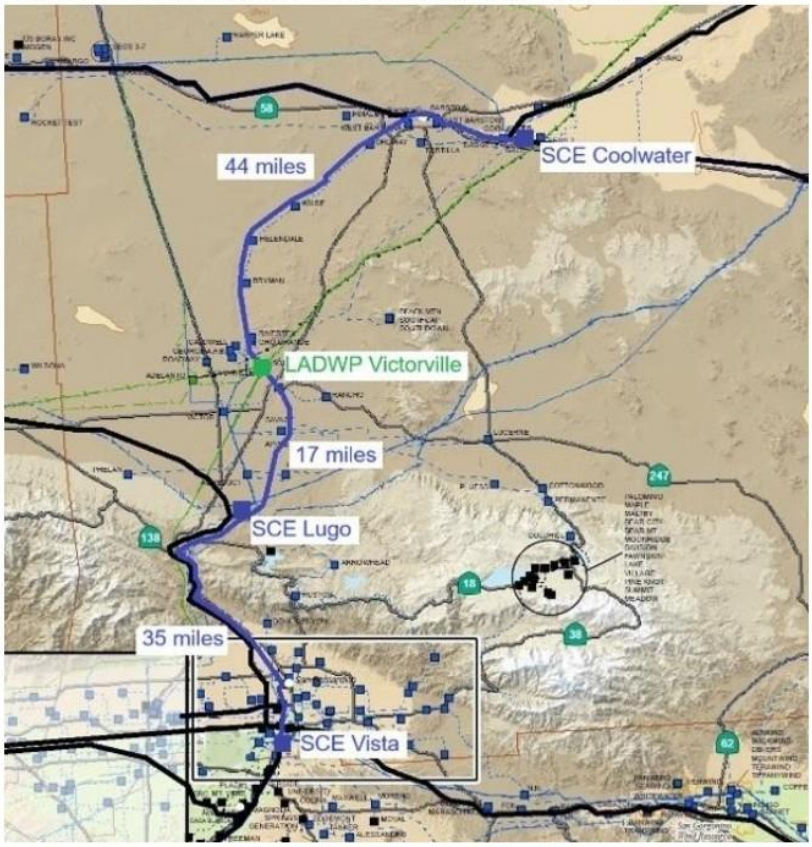
[12] https://www.railwayage.com/mechanical/locomotives/follow-the-megawatt-hours-hydrogen-fuel-cells-batteries-and-electric-propulsion/

[13] https://railtec.illinois.edu/wp/wp-content/uploads/UIUC-Hay-Seminar_Iden_20240927.pdf

[14] Southern California rail electrification Google My Map: https://www.google.com/maps/d/u/1/edit?mid=15AjsVJEgHQqvnQmprJYIpt7Auq_xmTw&usp=sharing

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basic power grid infrastructure is in place for powering an OCS electrification of the Cajon Subdivision. New electric power transmission lines sharing the Cajon Subdivision right-of-way, either buried cables (like the SOO Green[15] and CHPE[16] HVDC projects) or overhead AC power lines (combined with OCS[17]), could be a future revenue source for BNSF.



Map showing proximity of existing major substations and related power grid infrastructure to the BNSF Cajon Subdivision (background power grid map from California Energy Commission)

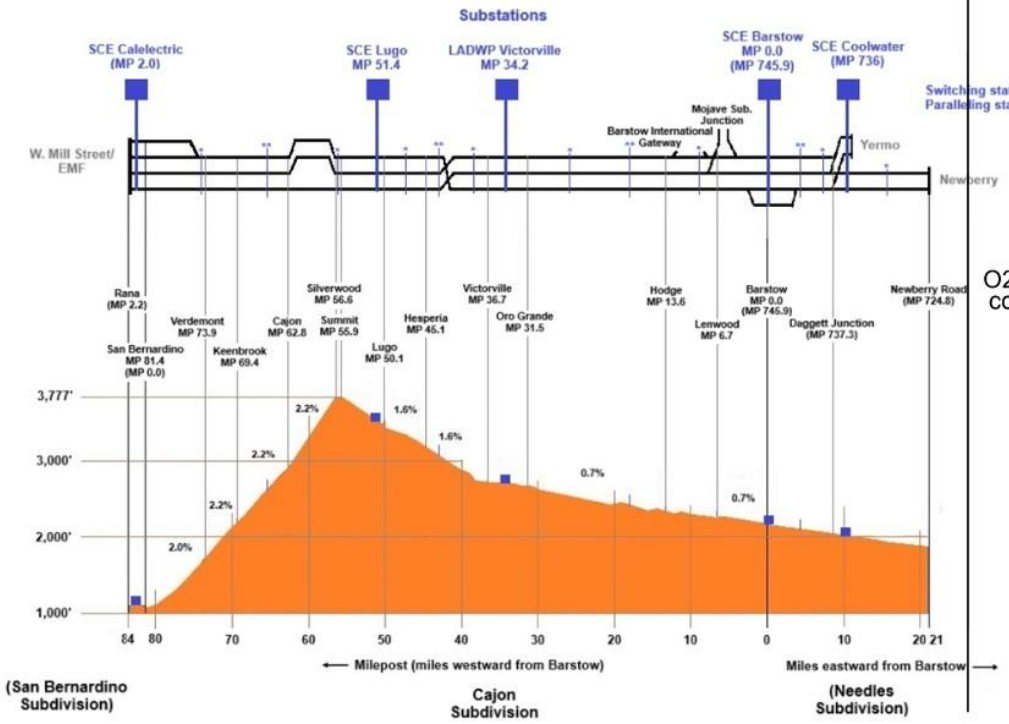
O22-17 cont'd

The steep grade of the Cajon Subdivision between San Bernardino (1,053') to Cajon Pass (3,777') climbs over 2,700' in net elevation over a route length of less than 26 miles, as shown on the elevation diagram below. The ruling grade is 2.2%. Such a grade is well-suited to an electric locomotive's many advantages in mountainous terrain, including better adhesion,

O22-18

[15] https://www.energyre.com/project/illinois/transmission/soo-green
[16] https://chpexpress.com/
[17] https://calelectricrail.org/wp-content/uploads/2026/01/FurrerFrey-66-kV-OCS-combined-mast-Switzerland.jpg

greater power at low speeds, and regenerative braking downhill– as proven by electric freight and passenger rail operations around the world.



O22-18 cont'd

The Cajon Subdivision's steep grade, combined with the high number of trains (over 60 per day) even before the BIG is operational, makes it an ideal candidate for electrification, as these factors make it one of the highest fuel usage rail segments in the country. The better uphill acceleration and tractive power of electric locomotives can increase the overall speed of freight trains moving uphill on Cajon Pass, which would increase overall freight volume throughput capacity and enhanced asset productivity. For example, speeding up freight trains going up Cajon Pass (even from average of ~10 mph in the slowest spots to a modest ~15 mph) could significantly increase the capacity of the BNSF Southern Transcon between LA and Chicago, including between the Ports of LA/LB and the BIG.

O22-19

A 1978 Federal Railroad Administration study on freight rail electrification used a metric for route evaluation not based simply on trains per day, but gross tons of freight per year. The positive rate of return scenarios (18- 21%) modelled were on routes with 70 million and 97 million gross tons per year, which work out to an average of about 19 and 27 freight trains per day (10,000 short tons each), respectively. A 1983 study, "Cost/Benefit Evaluation of Electrification of a U.S. Rail Network", concluded the best single 'surrogate' for main economic

O22-20

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factors of rail electrification was annual fuel consumption per route-mile, although variables uncorrelated with fuel consumption (e.g. bridge clearance and signal and communication compatibility) were still significant cost factors[18]. It should be remembered that the 1970s-80s era North American coal railroads justified electrification on at most three heavy trains per day. O22-20 cont'd

A 2024 study[19] of the economics of electrifying a longer segment with similar trains per day to the proposed ports to Barstow corridor found positive cost-benefit ratios (1.3-3.7) and a high rate of return (22.9%) for conventional electrification with public support, as is likely here. Cost sharing with utilities could further increase the financial benefit of electrification. O22-21

The 1992 regional rail electrification study by the Southern California Regional Rail Authority proposed the Ports of LA/Long Beach freight corridor as one of the highest-priority "candidate routes" for electrification[20]. A 2024 study by the Department of Energy on rail decarbonization also identified the ports to Barstow as part of a key corridor[21]. In summary, electrification of the ports to Barstow is far from infeasible and would be a net benefit for BNSF in addition to air quality. O22-22

In addition to engineering design and cost estimates, a technical study is needed on performance and economics of electric locomotive operations between Barstow and San Bernardino, and beyond to both Yermo/Newberry Springs and the Ports of LA and Long Beach. Such a study needs to evaluate how electrification could increase throughput (trains per day) on the Cajon Subdivision while reducing operating and maintenance costs for the BNSF Railway as well as emissions on the corridor. O22-23

It is imperative that electric truck charging infrastructure, electric switchers, and line-haul electrification of the Southern Transcon from the ports to Barstow be included as mitigations for the BIG. These investments will substantially improve air quality in the MDAB as well as the SCAB, with the potential for net financial and operational benefit to BNSF as well. O22-24

Sincerely,
Adriana Rizzo
Founding Member
Californians for Electric Rail

[18] C.H. Spenny and G.B. Mott, "Cost/Benefit Evaluation of Electrification of a U.S. Rail Network", Transportation Research Record 939, 1983.
[19] "Modeling the Economics of Modern Options for Mainline Freight Railway Electrification" C. Tyler Dick, Rydell Walthall, Michael Iden, Jim Blaze, 2024
https://railtec.illinois.edu/wp/wp-content/uploads/2024_11_08-Hay-Seminar_Tyler-Dick_compressed.pdf
[20] "Southern California Accelerated Electrification Program", Southern California Regional Rail Authority, 1992
https://libraryarchives.metro.net/dpgtl/Metrolink/1992-ExecSummary-SoCal-Accelerated-Rail-Electrification.pdf
[21] "An Action Plan for Rail Energy and Emissions Innovation", US Department of Energy, 2024
https://www.epa.gov/system/files/documents/2024-12/rail-action-plan-report.pdf

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RESPONSE TO COMMENT LETTER O22, CALIFORNIANS FOR ELECTRIC RAIL

O22-1 Commenter raises some concerns about the Draft EIR's analysis that are best addressed by sharing technical and scientific information, which is provided below. Comment is also an introduction to the following comments. See **Consolidated Response 04** concerning general non-CEQA issues.

O22-2 **Draft EIR Section 5.3: Air Quality** includes **MM BIG AQ-9**, which requires truck route signage to establish truck idling limits, **MM BIG AQ-11**, which requires require vendor trucks for the industrial buildings include energy efficiency improvement features through the Carl Moyer Program, **MM BIG AQ-12**, which requires tenants to enroll in the U.S. Environmental Protection Agency's SmartWay program, and use carriers that are SmartWay carriers, and **MM BIG AQ-14**, which requires which requires the BIG transload facility be designed to accommodate future electric truck charging. Further, as noted in **Consolidated Response 12** concerning the Project Description and enforceability, BIG, as an enforceable and binding commitment of the project, would utilize a dedicated fleet of Tier 4 locomotives for the cross-dock intermodal trains from the Ports to BIG, as well as increase the percent of renewable diesel in fuel for all BNSF trains fueling at the Ports from 1 percent to 10 percent, a 900 percent increase. In addition, with respect to communities in Barstow, in another binding and enforceable commitment, BNSF also would remove from service all of its 15 existing Tier 0/0+/1+ switcher locomotives and replace with six new Tier 4 switchers at the unrelated existing Barstow Classification Yard, and all switcher locomotives at BIG would be newly purchased Tier 4 locomotives, not pulled from BNSF's existing national fleet. See **Consolidated Response 05** concerning feasible and enforceable mitigation including applicable legal standards and **Consolidated Response 05-06** concerning the feasibility of specific technology (e.g., specific zero-emission technologies raised by commenter) and other mitigation measures.

O22-3 Comment does not raise a substantive concern to the Draft EIR. No further response is required.

O22-4 See **Responses I1892-1**, **O21-138**, **Consolidated Response 05** concerning feasible and enforceable mitigation including applicable legal standards. As fully explained in **Consolidated Response 05-06** concerning the feasibility of specific technology and other mitigation measures, imposing a ZE trucks requirement is infeasible. Imposing ZE/NZE truck requirements would impair BIG's ability to reduce regional truck trips by making it economically unviable for its customers. With a ZE truck requirement, regional truck trips would continue to other IMFs in San Bernardino or Los Angeles, eliminating one of the emissions benefits of BIG. An industry level issue such as adoption of a brand new technology to reduce drayage truck emissions and modify goods movement, requires an industry-wide regulation and solution, not a requirement that singles out one project. Mandating ZE Trucks is thus infeasible, and CEQA does not mandate designing a facility for infeasible mitigation. CEQA also does not require an applicant to design a project for technology that has been determined to be infeasible.

O22-5 See Responses **I1892-1, O21-106, O21-114, O21-117, O21-120, O21-121, O21-124 through O21-12, Consolidated Response 05** concerning feasible and enforceable mitigation including applicable legal standards and **Consolidated Response 05-06** concerning the feasibility of specific technology and other mitigation measures. Analysis of costs for various international projects presented by the Commenter is not warranted given international costs are substantially reduced due to reduced labor costs, regulatory and permitting requirements, lower land costs, and other key factors that render the comparison to United States construction costs irrelevant. See **Consolidated Response 12-03** concerning enforceability of the Project components and mitigation measures for the Project, showing the dedicated Tier 4 fleet is a binding and enforceable commitment.

O22-6 See **Response L17-18** and **Consolidated Response 12-03** concerning enforceability of the Project components and mitigation measures for the Project.

O22-7 See **Responses I1892-1, O21-106, O21-114, O21-117, O21-120, O21-121, O21-124 through O21-127** and **Consolidated Response 05** concerning feasible and enforceable mitigation including applicable legal standards and **Consolidated Response 05-06** concerning the feasibility of specific technology and other mitigation measures. Comparisons to Russia, South Africa, and India electrifications underscore that all catenary systems worldwide have been built using public funds due to the enormous costs associated with catenary installation.

O22-8 See **Responses I1892-1, O21-106, O21-114, O21-117, O21-120, O21-121, O21-124 through O21-127,** and **Consolidated Response 05** concerning feasible and enforceable mitigation including applicable legal standards, and **Consolidated Response 05-06** concerning the feasibility of specific technology (e.g., specific catenary electrification technologies raised by commenter) and other mitigation measures.

O22-9 See **Responses I1892-1, O21-106, O21-114, O21-117, O21-120, O21-121, O21-124 through O21-127,** and **Consolidated Response 05** concerning feasible and enforceable mitigation including applicable legal standards and **Consolidated Response 05-06** concerning the feasibility of specific technology and other mitigation measures. The commenter provides no substantial evidence supporting a claim that utilizing BELs or catenary for the cross-dock intermodal move would reduce emissions by "at least 15%." As detailed in the BEL and Catenary Feasibility Analysis, the improvement from Tier 4 locomotives to zero emission (either through BELs or through catenary) would result in less than 1% reduction in pollutant concentrations compared to the high reductions already achieved through Tier 4. Under CEQA, mitigation measures are also required to be "roughly proportional" to the significant impacts found in an EIR. (State CEQA Guidelines § 15126.4(a) (4&5).) Here, the benefits are marginal (*BEL and Catenary Feasibility Analysis*, page 14). Mitigation measures were deemed infeasible due to operational, technological, and power constraints. In addition, as shown in **Draft EIR Table 5.8-12: BIG GHG Emissions** (pages 5.8-61 through 5.8-62), BIG would result in net decrease in GHG emissions.

O22-10 See **Responses I1892-1, O21-106, O21-114, O21-117, O21-120, O21-121, O21-124 through O21-127, Consolidated Response 05** concerning feasible and enforceable mitigation including

applicable legal standards, and **Consolidated Response 05-06** concerning the feasibility of specific technology (e.g., full and intermittent catenary technologies raised by commenter) and other mitigation measures.

O22-11 See **Responses I1892-1, O21-106, O21-114, O21-117, O21-120, O21-121, O21-124 through O21-127, O23-3,** and **Consolidated Response 05** concerning feasible and enforceable mitigation including applicable legal standards and Consolidated Response 05-06 concerning the feasibility of specific technology (e.g., full and intermittent catenary technologies raised by commenter) and other mitigation measures. As noted in these responses, and substantiated by the *BEL and Catenary Feasibility Analysis*, catenary is not a feasible solution for the Corridor from the Ports to BIG. Regarding expanding electric infrastructure to other BNSF facilities across California, CEQA requires mitigation only for significant environmental effects resulting from changes to the physical environment caused by the Project when compared to baseline conditions.[116] CEQA does not require a project to reduce, eliminate, or otherwise remediate background environmental conditions that exist independent of the Project.[117] Thus, there is no nexus between BIG and converting BNSF's California network to catenary, thereby failing the "nexus" and "rough proportionality" tests for mitigation established by case law for systemwide upgrades to the mainline.[118,119,120] Additionally, the City has no legal authority to require BNSF to convert its rail network to catenary, as rail regulations are preempted under the Interstate Commerce Commission Termination Act (ICCTA), which establishes that the Surface Transportation Board has exclusive jurisdiction transportation by rail carriers.

O22-12 See **Response I1892-1, O21-106, O21-114, O21-117, O21-120, O21-121, O21-124 through O21-127** and **Consolidated Response 05** concerning feasible and enforceable mitigation, including applicable legal standards, Consolidated Response 05-06 concerning the feasibility of specific technology (e.g., full and intermittent catenary technologies raised by commenter) and other mitigation measures. The economic and operational viability of partial electrification of the Alameda Corridor is speculative and would only partially defray the cost to fully electrify the more than 130-mile Corridor from the Ports to BIG. Also, despite the High-Speed Rail Los Angeles to Anaheim Project Section Notice of Publication (NOP) being originally published March 15, 2007, as of 2026, the Environmental Impact Report has not been finalized or certified, land has not been acquired, and design has not been finalized. Thus, it is highly speculative to assume completion of this section of the Corridor by the California High-Speed Rail Authority. Further, even if this section of the High-Speed Rail system were to be constructed without delay, as noted in the California High-Speed Rail Los Angeles to Anaheim Project Section Draft EIR/Environmental Impact Statement Table 2-19 Los Angeles to Anaheim Project Section Construction Schedule, catenary infrastructure wouldn't be

116 *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439, 447–448.
117 *Baird v. County of Contra Costa* (1995) 32 Cal.App.4th 1464, 1479–1480.
118 *Nollan v. California Coastal Commission* (1987) 483 U.S. 825.
119 *Dolan v. City of Tigard* (1994) 512 U.S. 374.
120 *Ehrlich v. City of Culver City* (1996) 12 Cal. 4th 854.

constructed until October 2037, approximately 8.25 years after BIG construction is estimated to be completed.

O22-13 See **Response I1892-1** and **Consolidated Response 05** concerning feasible and enforceable mitigation including applicable legal standards **Consolidated Response 05-06** concerning the feasibility of specific technology (e.g., full and intermittent catenary technologies raised by commenter) and other mitigation measures. Passenger catenary infrastructure is incompatible with freight catenary infrastructure because freight catenary infrastructure requires substantial greater heights to accommodate double-stacking containers. Thus, BNSF would not be able to utilize Brightline West catenary infrastructure. Furthermore, Brightline West (formerly DesertXpress) is a new alignment and the Las Vegas terminus does not connect to any BNSF tracks. Thus, while "on paper" Brightline West appears to support broader electrification, it is disconnected from BNSF's western transcontinental route. In addition, the Brightline West environmental and permitted documents explicitly excluded shared use with freight rail, noting:

> "…the possibility of sharing these tracks was not considered further due to the heavy freight railroad traffic on these tracks, resulting in a substantial impairment to reliable high-speed rail service as well as existing and future freight service." (Record of Decision for DesertXpress High-Speed Passenger Train, page 13).

Thus, the Brightline West tracks are not designed to accommodate the far heavier freight rail traffic and the Brightline West entire alignment would need to be re-engineered to accommodate freight rail. In addition, no locomotive manufacturer has ever produced even a prototype freight locomotive with catenary connectivity, thus, this technology does not exist and is infeasible.

O22-14 See **Response O21-106, O21-114, O21-117, O21-120, O21-121, O21-124** through **O21-127** and **Consolidated Response 05** concerning feasible and enforceable mitigation including applicable legal standards **Consolidated Response 05-06** concerning the feasibility of specific technology (e.g., full and intermittent catenary technologies raised by commenter) and other mitigation measures.

O22-15 See **Response O22-9** and **Consolidated Response 05** concerning feasible and enforceable mitigation including applicable legal standards **Consolidated Response 05-06** concerning the feasibility of specific technology (e.g., full and intermittent catenary technologies raised by commenter) and other mitigation measures.

O22-16 See **Consolidated Response 05** concerning feasible and enforceable mitigation including applicable legal standards **Consolidated Response 05-06** concerning the feasibility of specific technology (e.g., full and intermittent catenary technologies raised by commenter) and other mitigation measures.

O22-17 See **Response I1892-1, O21-106, O21-114, O21-117, O21-120, O21-121, O21-124 through O21-127, O21-146** and **Consolidated Response 05** concerning feasible and enforceable mitigation including applicable legal standards **Consolidated Response 05-06** concerning the

feasibility of specific technology (e.g., full and intermittent catenary technologies raised by commenter) and other mitigation measures. Although existing large electric utility substations exist along the BNSF mainlines between LA, Fullerton, Riverside, San Bernardino, and the Barstow area, as demonstrated in the *BEL and Catenary Feasibility Analysis*, catenary was not deemed infeasible due to distance from large electric utility substations, but because implementing these measures would present unsurpassable technological and operational challenges which, combined with (but not solely due to) increased costs, would render BIG not competitive with current transportation options.

O22-18 See **Response O21-114** and **Consolidated Response 05** concerning feasible and enforceable mitigation including applicable legal standards **Consolidated Response 05-06** concerning the feasibility of specific technology (e.g., full and intermittent catenary technologies raised by commenter) and other mitigation measures.

O22-19 See **Response O21-114**, **O22-15** and **Consolidated Response 05** concerning feasible and enforceable mitigation including applicable legal standards **Consolidated Response 05-06** concerning the feasibility of specific technology (e.g., full and intermittent catenary technologies raised by commenter) and other mitigation measures.

O22-20 Commenter's sources are more than 40 years outdated, thus, are not substantial evidence concerning catenary feasibility. Catenary feasibility is discussed in detail in the *BEL and Catenary Feasibility Analysis*. See also **Response I1892-1, O21-106, O21-114, O21-117, O21-120, O21-121, O21-124** through **O21-127** and **Consolidated Response 05** concerning feasible and enforceable mitigation including applicable legal standards **Consolidated Response 05-06** concerning the feasibility of specific technology (e.g., full and intermittent catenary technologies raised by commenter) and other mitigation measures.

O22-21 See **Response I1892-1, O21-106, O21-114, O21-117, O21-120, O21-121, O21-124 through O21-127** and **Consolidated Response 05** concerning feasible and enforceable mitigation including applicable legal standards **Consolidated Response 05-06** concerning the feasibility of specific technology (e.g., full and intermittent catenary technologies raised by commenter) and other mitigation measures.

O22-22 Comment does not raise a substantive concern or issue regarding the adequacy of the analysis contained in the Draft EIR. No further response is required.

O22-23 Comment does not raise a substantive concern or issue regarding the adequacy of the analysis contained in the Draft EIR. No further response is required.

O22-24 See **Response O22-4, Consolidated Response 05** concerning feasible and enforceable mitigation and **Consolidated Response 05-06** concerning the feasibility of specific technology and other mitigation measures.

COMMENT LETTER O23

O23

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publicrailnow.org

Dear City of Barstow,

I am writing on behalf of *Public Rail Now* to encourage the reconsideration of catenary electrification as a part of the Barstow Intermodal Gateway Project Environmental Impact Report (EIR). This option was initially dismissed in the EIR Report because it would "involve laying thousands of miles of electrifies lines the distance of the rail."[i] From our perspective, this both exaggerates the necessary capital expense, and ignores the practicality of catenary electrification. We believe a full, specific evaluation is worthwhile. O23-1

We would like to note that one of the principal objections from BNSF and Union Pacific to the now-withdrawn CARB in-use locomotive rule, was that a requirement to electrify in California would force them to electrify their entire system. While we believe this would be desirable in the long run, the EIR states that "For the **dedicated fleet** [emphasis ours] from the Ports to BIG's intermodal facility, BIG is anticipated to receive approximately three trains per day in 2028, increasing to approximately five trains per day in 2048." O23-2

The existence of a dedicated fleet indicates that the very nature of the Barstow Intermodal Gateway, to serve as a *Gateway* to California, means that a separate electrification program for Barstow to the Ports of Long Beach and Los Angeles would, in fact, be viable. Even if BNSF were to electrify all its owned trackage in California, that would account for less than 1,000 route miles. To be exact, BNSF owns 913 route miles in California.[ii] A primarily overhead catenary-powered locomotive with a supplemental battery would be capable of operating off-wire on branch lines and industrial tracks, reducing the total amount that needs immediate catenary.

For comparison, in the past ten years, Indian Railways has electrified over 25,000 route miles with overhead catenary. Their electrification program has also allowed for double-stacked intermodal containers to pass under wire seamlessly through dedicated freight corridors.[iii] Electrifying BNSF's route from Barstow to Long Beach would be less than 1 percent of that length.

Several scenarios should be considered: O23-3

- Full electrification of BNSF's California network
- Electrification of BNSF's busiest mainlines and yards in California, with dual mode catenary-battery (or catenary-diesel dual mode) locomotives to service lower volume lines
- Electrification solely of BNSF's mainline from Los Beach/Los Angeles Ports to BIG via Cajon Pass

Failing to fully evaluate electrification options at this moment would mean missing the chance to take advantage of cost efficiencies to develop substations alongside the Brightline West high-speed rail project.

Southern California Edison will be constructing a new substation to power Brightline in Barstow.[iv] This substation will supply power at the international standard 25 kV 60 Hz AC. O23-4

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In Figure 1 below, you can see a diagram of Brightline West's proposed power supply.[v] There is another proposed substation at Hesperia, which is also located near BNSF's mainline to Los Angeles.



Figure 1. Brightline West Power Supply

O23-4 cont'd

The opportunity to co-locate or jointly utilize railroad electrification substations is a rare occurrence in the United States. As a result, we would highly encourage the City of Barstow and BNSF Railway to perform a full evaluation of various catenary electrification scenarios, alongside the current battery electric locomotive (BEL) evaluations. The future regulatory and fuel price environments are uncertain, and to miss the chance to save on capital costs by collaborating with Brightline West would be an historic missed opportunity.

O23-5

Thank you for your consideration. If any further information could be of use, please reply to the email listed above.

Sincerely,

Maddock Thomas

Researcher, Public Rail Now

[i] Barstow Intermodal Gateway EIR, page 5.3-110
[ii] BNSF, "BNSF in California," https://bnsfcalifornia.com/bnsf-in-california
[iii] Maddock Thomas. *Putting America Back on Track: The Case for a 21st Century Public Rail System*. Public Rail Now, July 1, 2024. https://doi.org/10.26300/rmfi-9307. Pages 53-55.
[iv] Brightline West Bond Issue Filing, https://emma.msrb.org/P21905094-P31129282-P31541948.pdf, page 102, 1216 ; *Las Vegas to Rancho Cucamonga High-Speed Rail Project Independent Engineer Technical Report*, page 63
[v] Brightline West Bond Issue Filing, https://emma.msrb.org/P21905094-P31129282-P31541948.pdf, page 1283; *Las Vegas to Rancho Cucamonga High-Speed Rail Project Independent Engineer Technical,* Appendix III, page 130.

RESPONSE TO COMMENT LETTER O23, PUBLIC RAIL NOW

O23-1 Commenter raises some concerns about the Draft EIR's analysis that are best addressed by sharing technical and scientific information, which is provided below. The Draft EIR considered overhead catenary system electrification and concluded it is not feasible for the BIG due to the extent of infrastructure required, coordination needs across multiple rail segments, and operational constraints associated with shared freight corridors. Electrification feasibility must be evaluated in the context of the broader rail network rather than a single project segment. The analysis acknowledges that BNSF operations span long distances and multiple jurisdictions, which affects the practicality of installing and operating catenary systems solely for BIG. See **Response O21-124** and **Consolidated Response 05** concerning feasible and enforceable mitigation including applicable legal standards and **Consolidated Response 05-06** concerning the feasibility of specific technology (e.g., specific full and intermittent catenary technologies raised by commenter) and other mitigation measures.

O23-2 See **Response O21-124, Consolidated Response 05** concerning feasible and enforceable mitigation including applicable legal standards and **Consolidated Response 05-06** concerning the feasibility of specific technology (e.g., specific full and intermittent catenary technologies raised by commenter) and other mitigation measures.

O23-3 See **Response O21-124 Consolidated Response 05** concerning–feasible and enforceable mitigation including applicable legal standards and **Consolidated Response 05-06** concerning the feasibility of specific technology (e.g., specific zero-emission technologies raised by commenter) and other mitigation measures**.**

A scenario involving electrification of BNSF's entire California network is not reasonable nor within the scope of BIG and this EIR. Electrifying BNSF's entire California network, comprised of 913 miles of tracks, would result in estimated costs between $11 billion and $45.7 billion.[121] Additionally, CEQA requires mitigation only for significant environmental effects resulting from changes to the physical environment caused by the Project when compared to baseline conditions.[122] CEQA does not require a project to reduce, eliminate, or otherwise remediate background environmental conditions that exist independent of the Project.[123] Thus, there is no nexus between BIG and BNSF's California network. Additionally, the City has no legal authority to require BNSF to replace portions of its national fleet, as this is preempted under the Interstate Commerce Commission Termination Act (ICCTA), which establishes that the Surface Transportation Board has exclusive jurisdiction transportation by rail carriers. Finally, electrifying BNSF's entire California network would have no synergy with BNSF's remaining national network, spanning more than 31,000 track miles. Trains would need to be retrofitted or newly commissioned to work on the catenary system within California while still fully functioning on BNSF's national network. No reasonably prudent person would proceed with this scenario, thus, no further analysis concerning electrifying BNSF's entire California network is necessary.

[121] Assuming the "moderate U.S." scenario at approximately $12m or "high-end U.S." cost scenario at approximately $50m, presented in the comment (Comment O21).

[122] *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439, 447–448.

[123] *Baird v. County of Contra Costa* (1995) 32 Cal.App.4th 1464, 1479–1480.

O23-4 See **Consolidated Response 04** concerning non-CEQA issues.

O23-5 Comment does not provide a substantive concern to the Draft EIR. See **Response O23-1** and **O23-3.**

COMMENT LETTER O24

Center for Biological Diversity Comments on BNSF Barstow International Gateway (BIG) Draft Environmental Impact Report (SCH No. 2024020501)

O24

Shannon Labuschagne <Slabuschagne@biologicaldiversity.org>

Mon 1/12/2026 4:16 PM

To: GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

Cc: Chris Heldreth <cheldreth@barstowca.org>;

1 attachments (454 KB)

Center for Biological Diversity Barstow BIG Comments.pdf;

[NOTICE: THIS IS AN EXTERNAL EMAIL]
Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!.

Caution! This message was sent from outside your organization.

Dear Mr. Heldreth,

Please find attached comments submitted on behalf of the Center for Biological Diversity regarding the BNSF Barstow International Gateway (BIG) Draft Environmental Impact Report (SCH No. 2024020501).

O24-1

Additionally, all references cited to in the comments are available here: Barstow Comment References

Thank you for the opportunity to comment. Please confirm receipt of this submission and let me know if any additional information is required.

Kind regards,
Shannon Labuschagne
Center *for* Biological Diversity



CENTER for BIOLOGICAL DIVERSITY Because life is good.

January 12, 2026

Sent via email and FedEx

Chris Heldreth
Community Development Director
City of Barstow
220 East Mountain View Street, Suite A
Barstow, California 92311
generalplan@barstowca.org

Re: Comments on BNSF Barstow International Gateway (BIG) Draft Environmental Impact Report (SCH No. 2024020501)

Dear Mr. Heldreth:

These comments are submitted on behalf of the Center for Biological Diversity (the "Center") regarding the City of Barstow General Plan and Barstow International Gateway Project. The Center has reviewed the Draft Environmental Impact Report ("DEIR") and is concerned that the DEIR fails to properly disclose, analyze, and mitigate significant environmental impacts. O24-2

As a preliminary matter regarding the General Plan update, the City of Barstow has an important opportunity to more meaningfully incorporate wildlife connectivity into their Plan, as required by Assembly Bill 1889 (Friedman), the Room to Roam Act, passed and signed into law in 2024. According to the Act, "[i]t is … the policy of the state to protect, restore, and improve the functioning of fish, wildlife, and habitat connectivity through local government land use planning and zoning" and local jurisdictions, like the City, are required to "consider and implement measures to avoid, minimize, or mitigate impacts to fish, wildlife, and habitat connectivity from existing and planned land uses within their jurisdictions" and "implement measures to remediate barriers to wildlife connectivity within their jurisdictions to the extent feasible" (Assem. Bill 1889, ch. 686, 2024 Cal. Stat., § 1(a)). The O24-3

The Center fully joins and incorporates by reference the written comments submitted by Earthjustice on our behalf regarding the DEIR. The Center further shares the concerns raised in the California Department of Fish and Wildlife's comment. In addition to these comments, the Center submits the following supplemental comments focused specifically on the DEIR's O24-4

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analysis of the Barstow International Gateway Project's ("BIG" or "the Project") impacts to biological resources. The Center is concerned that the DEIR fails to properly disclose, analyze, and mitigate potentially significant environmental impacts to biological resources, including the GHG impacts of lost carbon sequestration, wildlife connectivity, traffic, and other impacts to special status species. The Center urges the City of Barstow to undertake a thorough and comprehensive environmental review of the Project as required under the California Environmental Quality Act ("CEQA") prior to considering approval. By replacing largely undeveloped desert lands, including irreplaceable dune habitat and areas of wildlife connectivity, with thousands of acres of development including a rail yard, transload warehouse center, and associated infrastructure, the Project will release carbon stored in the desert and destroy habitats that species depend on. The DEIR must fully analyze and disclose the Project's potential impacts to biological resources, including the impacts of lost carbon sequestration, habitat destruction, reduced wildlife connectivity, increased traffic, and other impacts to special status species, while thoroughly analyzing all reasonable alternatives. The DEIR must then provide effective and enforceable mitigation measures for impacts found to be significant. O24-4 cont'd

The Center is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 1.7 million members and activists throughout California and the United States. The Center has worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life for people in San Bernadino County. O24-5

I. The City Must Revise and Recirculate the DEIR.

Under CEQA, an EIR must provide decision-making bodies and the public with detailed information about the effect a proposed project is likely to have on the environment, list ways in which the significant effects of a project might be minimized, and indicate alternatives to the project. (Pub. Res. Code § 21002.2.) The proposed Project will turn approximately 5,000 acres of largely undeveloped desert lands into a rail yard, a transload warehouse center, and a private utility operating 24 hours per day, 365 days per year. The DEIR must fully disclose the impacts of this land-use change so that the public can understand the publicly born costs associated with the Project. O24-6

II. The DEIR Fails to Fully Account for the Greenhouse Gas Impacts of Lost Carbon Sequestration and Storage from Desert Habitats.

California is at the forefront of the climate crisis. Poor land-use planning and extreme weather events have led to an onslaught of disasters harming communities and threatening the state's ecosystems and people's livelihoods. Climate change increasingly places stress on species and ecosystems—causing changes in distribution, phenology, physiology, vital rates, genetics, O24-7

ecosystem structure, and processes—in addition to increasing species' extinction risk. (Warren et al., 2011.) Climate-change-related local extinctions are already widespread and have occurred in hundreds of species. (Wiens, 2016.) Catastrophic levels of species extinctions are projected throughout this century if climate change continues unabated. (Maclean & Wilson, 2011; Thomas et al., 2004; Urban, 2015.) Climate change is a problem with cumulative impacts and effects. (*Ctr. for Biological Diversity v. Nat'l Highway Traffic Safety Admin.* (9th Cir. 2008) 538 F.3d 1172, 1217 ("[T]he impact of greenhouse gas emissions on climate change is precisely the kind of cumulative impacts analysis" that agencies must conduct).) Because the combined impacts of many GHG emission sources can drastically damage California's climate, Project-specific GHG emission disclosure, analysis, and mitigation remain vital to maintaining California's climate. O24-7 cont'd

To adequately assess and mitigate the Project's GHG impacts, the DEIR must include the carbon storage and sequestration potential of these habitats in the analysis. As detailed in a 2024 report, "The California Desert's Role in 30x30: Carbon Sequestration and Biodiversity," California deserts are significant carbon sinks that should be included in carbon calculations. (Allen et al., 2024; *see also* Yap et al., 2023.) In California, desert landscapes consist of dunes, desert scrub, sandy soil grasslands, juniper-pinyon woodlands and rock formations. The Mojave Desert is dominated by deep-rooted shrub species, including creosote bush and white bursage, as well as many forbs, trees, grasses, and dunes. In the BIG Project area, the 5,000-acre landscape consists of 15 different vegetation communities and two landcovers, including extensive creosote bush, desert saltbush scrub, and active Mojave Desert dunes with specialized native flora. (DEIR at 5.4-30–32.) O24-8

Although the carbon storage and sequestration potential of such habitats are often overlooked, carbon in these systems is stored in the form of soil organic carbon (e.g., extensive root networks, soil microbial communities, mycorrhizae), soil inorganic carbon (e.g., calcite/caliche), and above-ground vegetation (Allen et al., 2024; Janzen, 2004; Meyer, 2012; Mi et al., 2008; Thomey et al., 2014; Wang et al., 2010; Zamanian et al., 2016.)

Any loss of nature-based carbon storage must be accounted for when assessing a Project's GHG impacts. When calculating carbon loss from habitats, it is important to consider the types of habitats. Although more research is needed to understand the carbon storage and sequestration potential for all desert systems, various desert habitats store and sequester different amounts of carbon. For example, Evans et al. (2014) found that areas of the northern Mojave Desert in Nevada store an average of approximately 4.17 metric tons of carbon per acre, and these areas were found to sequester 0.4 to 0.51 metric tons of carbon per acre per year (Jasoni et al., 2005; Wohlfahrt et al., 2008.) However, desert ceanothus (*Ceanothus greggii*) was found to store up to 41 metric tons of carbon per acre in their aboveground biomass and up to 5.8 metric tons of carbon per acre in their belowground biomass while accumulating 2.4 metric tons of carbon per acre per year (this does not include organic or inorganic soil carbon). (Bohlman et al., O24-9

2018.) And experts estimate that the combined vegetation types, creosote bajada scrub and microphyll woodland, could sequester an average of 1.5 million tons of carbon per year across California's Inland Desert Area. (Allen et al., 2024.) O24-9 cont'd

Given that the Project area spans 5,000 acres, includes over 1,000 acres of active desert dunes, more than 1,000 acres of creosote bush, hundreds of acres of salt bush, among other expanses of vegetation, it is likely that the area stores and sequesters a significant amount of carbon. (*See* DEIR at 5.4-30.) Notably, the DEIR fails to clearly identify how many acres of this vegetation will be disturbed by the Project, instead burying this information in an Appendix. However, Table 14, explicitly acknowledges BIG will permanently impact up to 4,390.4 acres of vegetation. (Appendix 5.4 BIG-1 at 161.) Destroying and degrading this vast expanse of desert habitat will release significant amounts of carbon and destroy the habitat's ability to sequester carbon independently and indefinitely. Yet, the DEIR contains no assessment or quantification of these GHG impacts, resulting in an inadequate baseline that frustrates an accurate assessment of the Project's environmental impacts. The DEIR must be revised to disclose and analyze the GHG impacts of removing desert habitat and, if feasible, mitigate them. O24-10

IV. The DEIR Fails to Adequately Disclose and Evaluate the Impacts to Wildlife Connectivity.

Effective, functional wildlife corridors are continuous and wide enough to overcome edge effects of development, dominated by native vegetation, and have equal or higher habitat quality than core habitat patches. (Bennett et al., 1994; Brooker et al., 1999; J. A. Hilty & Merenlender, 2004.) Development can diminish the quality of wildlife corridors by increasing edge effects and fragmenting existing habitat, creating barriers to wildlife movement, and reducing wildlife's resilience to climate change.

First, edge effects from development include increased noise, light, and human presence that can disrupt habitats and wildlife. Edge effects of development can impact key wide-ranging predators, such as bobcats, American badgers, and mountain lions (Crooks, 2002; Delaney et al., 2010; Lee et al., 2012; Riley et al., 2006; Smith et al., 2015, 2017; Wang et al., 2017), as well as smaller species with smaller home ranges, such as songbirds, bats and other small mammals, and herpetofauna. (Benítez-López et al., 2010; Bunkley & Barber, 2015; Cushman, 2006; Delaney et al., 2010; Gray, 2017; Kociolek et al., 2011; McClure et al., 2013; Slabbekoorn & Ripmeester, 2008; Ware et al., 2015.) Limiting movement and dispersal can affect species' ability to find food, shelter, mates, and refugia after disturbances like fires or floods. Individuals can die off, populations can become isolated, sensitive species can become locally extinct, and important ecological processes like plant pollination and nutrient cycling can be lost. Negative edge effects from human activity, like pollutants, invasive weeds, and increased fire frequency, have been O24-11

found to be biologically significant up to 300 meters (~1000 feet) away from anthropogenic features in terrestrial systems. (Environmental Law Institute, 2003.) O24-11 cont'd

Second, habitat fragmentation also severely impacts plant communities. An 18-year study found that reconnected landscapes had nearly 14% more plant species compared to fragmented habitats, and that number is likely to continue to rise as time passes. (Damschen et al., 2019.) The authors conclude that efforts to preserve and enhance connectivity will pay off over the long-term. (Damschen et al., 2019.) In addition, connectivity between high quality habitat areas in heterogeneous landscapes is important to allow for range shifts and species migrations as climate changes. (Cushman et al., 2013; Heller & Zavaleta, 2009; Krosby et al., 2018.) Loss of wildlife connectivity decreases biodiversity and degrades ecosystems while reducing climate change resilience. O24-12

Third, development diminishes the quality of wildlife corridors by adding barriers to wildlife movement over the landscape. As detailed in a 2021 Center Report (Yap et al., 2021), roads and development create barriers that lead to habitat loss and fragmentation, which harms native wildlife, plants, and people. As barriers to wildlife movement, poorly-planned development and roads can affect an animal's behavior, movement patterns, reproductive success, and physiological state, which can lead to significant impacts on individual wildlife, populations, communities, landscapes, and ecosystem function. (Brehme et al., 2013; Ceia-Hasse et al., 2018; Haddad et al., 2015; Marsh & Jaeger, 2015; Mitsch & Wilson, 1996; Trombulak & Frissell, 2000; van der Ree et al., 2011.) Habitat fragmentation has been found to increase local extinction risk in amphibians and reptiles (Brehme et al., 2018; Cushman, 2006; Delaney et al., 2021), cause high levels of avoidance behavior and mortality in birds and insects (Benítez-López et al., 2010; Kantola et al., 2019; Loss et al., 2014), alter pollinator behavior, and degrade habitats. (Aguilar et al., 2008; Goverde et al., 2002; Trombulak & Frissell, 2000.) O24-13

Fourth, it is widely recognized that the continuing fragmentation of habitat by humans threatens biodiversity and diminishes our (humans, plants, and animals) ability to adapt to climate change. In a report for the International Union for Conservation of Nature, world-renowned scientists from around the world stated that "[s]cience overwhelmingly shows that interconnected protected areas and other areas for biological diversity conservation are much more effective than disconnected areas in human-dominated systems, especially in the face of climate change" and "[i]t is imperative that the world moves toward a coherent global approach for ecological connectivity conservation, and begins to measure and monitor the effectiveness of efforts to protect connectivity and thereby achieve functional ecological networks." (Hilty et al., 2020.) O24-14

A. The Project's Impacts to Wildlife Connectivity Are Not Fully Disclosed and Analyzed.

The DEIR minimizes the Project area's importance to wildlife connectivity and fails to incorporate the Project's Wildlife Movement Study's findings in assessing the significance of BIG's impact. (*See* Appendix 5.4 BIG-1: Wildlife Movement Study at 5–7.) Instead of acknowledging the documented value the Project area provides to wildlife connectivity, the DEIR instead characterizes impacts as limited or less than significant by emphasizing existing development and fragmentation. For example, it states that "existing barriers to movement limit the ability for many species to move through the BIG footprint to surrounding areas of natural habitat . . . Due to these existing obstructions, the natural habitat in the BIG footprint is fragmented from larger blocks of natural habitat to the southeast and northwest." (DEIR at 5.4-102.) It then notes "select areas of the BIG footprint *may* facilitate wildlife movement." (*Id.*) O24-15

This is misleading for at least two reasons. First, the existence of some barriers on the Project site does not eliminate its value to wildlife connectivity given the sheer size of BIG's footprint—5,000 acres—which is almost entirely undeveloped. Relying on existing degradation to minimize impacts improperly discounts the ecological function that the remaining linkage areas continue to provide, particularly in portions of connectivity along the Mojave River corridor. Second, to say that current natural areas in proposed BIG's footprint 'may' facilitate wildlife movement conflicts with the Project's Wildlife Movement Study, which conclusively states "The BIG footprint is also used by local wildlife populations as a local corridor for movement, foraging, cover, and breeding, as well as a corridor for movement between the larger regional blocks of habitat and regional connectivity areas beyond the BIG footprint." (DEIR at 5.4-58.) Thus, the DEIR should explicitly disclose that areas within the proposed BIG footprint *do* currently facilitate wildlife movement. In failing to do so, the DEIR understates the cumulative and incremental loss of connectivity due to intensified development in California's deserts. It further masks how BIG's footprint area serves as an important, albeit constrained, linkage between larger habitat blocks, and fails to adequately analyze how the Project seriously risks severing regional wildlife movement through its construction and operation. O24-16

Significantly, the DEIR's impact discussion on wildlife movement omits findings from the Wildlife Movement Study and thereby fails to analyze how the Project will impede the documented movements of regional wildlife. The study's findings are not discussed in the DEIR and are instead attached in part 6 of Appendix 5.4 BIG-1. The study documents numerous wildlife currently using corridors such as Lenwood Channel within the proposed BIG footprint, including kit foxes, coyotes, bobcats, western burrowing owl, desert tortoise, western toad, squirrels, rabbits, and migratory birds among other species. (Appendix 5.4 BIG-1: Wildlife Movement Study at 5–7.) Moreover, the study identified that the use of the Mojave River as a corridor for local and regional wildlife movement within the Project area could be studied further. (*Id.* at 8.) These results, and the need for further study to fully understand the Project's O24-17

impacts to wildlife connectivity, is omitted from the impact discussion. Instead, the DEIR engages in a desktop analysis of mapped connectivity corridors that intersect with BIG's footprint. This approach, which ignores how documented wildlife moves through the Project site, creates an inaccurate baseline for wildlife connectivity and frustrates a meaningful analysis of the Project's impacts. An adequate analysis must account for the study's findings. O24-17 cont'd

Additionally, the DEIR does not analyze BIG's impacts to the Mojave River corridor. The DEIR documents that "[o]ne American beaver was incidentally observed swimming upstream in the Mojave River near the BIG footprint." (DEIR at 5.4-90.) Despite the observation, the DEIR characterizes the species' presence as limited, noting "The species is not anticipated to dwell within the section of the Mojave River immediately adjacent to BIG since the river does not contain permanent water throughout the year." (*Id.*) The observation demonstrates that the river channel periodically operates as a movement corridor for semi-aquatic species like the American beaver. A wildlife corridor is, by nature, used intermittently by wildlife moving through the area. The fact the river does not have a permanent surface flow facilitating year-round movement for semi-aquatic animals does not diminish its importance as a corridor, especially in a desert landscape where surface water is often inherently seasonal but ecologically significant. Despite this, the DEIR asserts construction and operation of BIG will have less than significant impacts to beavers, relying on measures such as pre-construction sweeps and claiming operational noise and light pollution will not harm the species. (*Id.*) However, this species-specific analysis fails to grapple with how the Project's various effects will impair the river's broader function as a movement corridor. To remedy this deficiency, the DEIR must be revised to address whether the Project, including edge effects from lighting and noise, will interfere with wildlife movement along the Mojave river corridor as required under CEQA. (CEQA Guidelines, Appendix G, subd. IV(d).) Further, the potential connectivity issues must also be addressed as a species' specific impact to American beavers. O24-18

Finally, various forms of permanent security fencing are proposed for the site to restrict wildlife from entering the BIG Specific Plan area. (*See, e.g.*, DEIR MM BIG BIO-34.) This could exacerbate BIG's connectivity impacts. However, the details of the Project's fencing plans are undisclosed and its potential impact on wildlife connectivity is unanalyzed. To fully disclose and, where feasible, mitigate BIG's impacts on wildlife connectivity, details of permanent fencing must be included and analyzed in the DEIR. O24-19

Thus, because the DEIR understates and minimizes BIG's impacts to wildlife connectivity and relies on an improperly limited baseline, it fails to disclose, analyze, and mitigate the Project's true environmental effects and must be revised and recirculated to comport with CEQA.

B. The Project's Impacts to Wildlife Connectivity Are Insufficiently Mitigated.

Under CEQA guidelines, a project will have a significant impact on biological resources if it interferes substantially with the movement of any native resident or migratory wildlife species or migratory wildlife corridors. (CEQA Guidelines, Appendix G, subd. IV(d).) Although BIG's footprint intersects with five mapped wildlife movement corridors and a study confirms wildlife uses the Project site as a movement corridor, the DEIR concludes the Project will have less than a significant impact on wildlife movement with mitigation measures. (*See* DEIR at 5.4-21; 58–59.) O24-20

The DEIR acknowledges "Five existing culverts and crossings along the railway at Mile Posts 10.9, 10.06, 8.9, 8.2, and 7.0 occur in areas where development would severely limit their function as wildlife crossings" resulting in potentially significant impacts to their function as wildlife corridors. (DEIR at 5.4-103.) To remedy this impact to less than significant, the DEIR proposes MM BIG BIO-32, which requires "BIG construction to include a wildlife crossing at Mile Post 12.5 to facilitate wildlife movement through the BIG footprint." (*Id.*) It asserts this wildlife crossing "would ensure that existing wildlife movement through the BIG footprint would continue." (*Id.*) However, remedying the loss of five wildlife crossings with one falls short for several reasons. First, reducing the number of crossings also reduces the likelihood wildlife will be able to locate a crossing at the same frequency. Second, by reducing the number of crossings, the Project will increase the concentration of individual animals using one single crossing, potentially deterring prey animals and other species, like kit foxes, that try to avoid larger predators using the crossing, like coyotes. (*See* Appendix 5.4 BIG-1: Wildlife Movement Study at 7.) Thus, MM BIG BIO-32 is unlikely to reduce the impacts on wildlife connectivity to less than significant. O24-21

Relatedly, the DEIR acknowledges BIG operations will obstruct wildlife movement through corridors because of increased noise, dust, and lighting in the vicinity, but concludes this is sufficiently mitigated by MM BIG BIO-32. However, a single wildlife crossing does not adequately address the broader, project-wide noise, dust, and nighttime lighting that will persist across BIG's footprint as well as surrounding corridor areas. The proposed wildlife corridor as well as the Lenwood Channel corridor would both be impacted by these broader operational disturbances. These ongoing stressors can deter the frequency with which wildlife use corridors, reducing their effectiveness and functionally inhibiting connectivity even where a physical crossing is present. Because MM BIG BIO-32 does not address these impacts and the DEIR otherwise does not otherwise analyze how movement through these corridors would be impacted, it fails to ensure wildlife movement through the Project site would be maintained at baseline levels. The DEIR must be revised to either disclose and analyze these potential impacts or include additional mitigation measures, such as the protection or creation of additional corridors, along with further reductions in noise, light, and dust pollution from the Project. O24-22

Finally, MM BIG BIO-34 is designed to prevent wildlife from entering the BIG Specific Plan Area by installing permanent security fencing, but by its own terms it does not maintain, restore, or facilitate wildlife movement through the Project site. (*See* DEIR MM BIG BIO-34.) Instead, the measure intentionally creates a barrier to restrict movement of reptiles and mammals, including desert tortoise, further fragmenting habitat and constraining connectivity. (*Id.*) While the fencing may reduce risks of wildlife mortality within the BIG Specific Plan area, it may also simply drive wildlife into other highly trafficked areas on the edges of the proposed Project, resulting in mortalities and deepening fragmentation. Further, MM BIG BIO-34 impermissibly defers key elements of mitigation by postponing final fencing design until after project approval without establishing measurable standards to ensure wildlife connectivity is maintained. It instead requires a designated biologist "to review and approve" fencing plans but does not define criteria for how fencing must avoid fragmenting habitat or ensure wildlife is guided towards established corridors rather than other high-risk areas. (*Id.*) This measure must be revised and analyzed to account for the Project's impacts to wildlife connectivity and to remedy impermissible deferral. O24-23

V. The DEIR Fails to Adequately Disclose and Evaluate the Traffic Impacts on Wildlife.

The DEIR's Biological Resources disclosure and analysis does not adequately address how the Project's operations will increase train and truck traffic and potentially impact biological resources. Increased train and local truck traffic can harm wildlife directly by increasing mortalities, and indirectly by exacerbating habitat fragmentation. While the DEIR acknowledges that the Project site's existing "presence of vehicles and the potential for collisions along National Trails Highway and the existing railway may also prevent wildlife moving into and throughout the BIG footprint to forage, disperse, and/or seek cover," it does not adequately address how BIG will exacerbate these harms by intensifying local traffic. (DEIR at 5.4-102.) O24-24

The DEIR assumes without substantiating its claim that train traffic will increase even without the construction and operation of BIG. (Appendix 5.12 BIG-1 at 51.) However, this claim contradicts the DEIR's statement that BIG "will move freight off the roads and onto rail," which suggests increased frequency of train trips to BIG. (*See* DEIR at 3-5.) Because the DEIR makes contradictory claims about BIG's impacts to train traffic, it's potential impacts to wildlife mortality and habitat fragmentation remains undisclosed and mitigated. O24-25

Construction and operation of BIG will increase both employee traffic to and from the Project site as well as local truck traffic. The DEIR states BIG will create nearly 16,000 jobs, undeniably leading to an increase in worker commutes to and from the Project site. Additionally, while the DEIR claims BIG will reduce truck trips nationwide, it fails to address how an increase O24-26

in local traffic will impact wildlife. Appendix 5.15 shows BIG will add over half a million truck trips between the Project site and various destinations, including Boron, the Central Valley, Arizona, Nevada, Victorville, the Inland Empire, among others. (Appendix 5.15 BIG-1 at 144.) To adequately disclose and evaluate the Project's traffic-related impacts on wildlife, the DEIR must explicitly quantify the number of additional local truck trips generated by BIG, identify the specific routes the trucks would use, and analyze the resulting increase in wildlife-vehicle collision risk. O24-26 cont'd

Absent this information, the DEIR cannot assess whether increased local truck traffic would substantially increase mortality risks for sensitive species on affected roadways. For example, if project-related truck trips increase traffic along the State Route 247, a road that lacks desert tortoise exclusion fencing and navigates through occupied habitat, the Project could cause a significant impact to a special status species and require mitigation. Proper mitigation measures could include installing desert tortoise exclusion fencing or other wildlife-vehicle collision avoidance features in high-risk areas along State Route 247. Without clear disclosure of truck route patterns and destinations, the DEIR cannot meaningfully analyze these impacts or identify feasible and effective mitigation, violating CEQA's informational and disclosure requirements. The DEIR must be revised and recirculated to remedy this deficiency. O24-27

VII. The DEIR Fails to Adequately Disclose and Evaluate Impacts to Special Status Species.

Under CEQA, an environmental review document must evaluate the potential environmental impacts of the project as compared to the existing environmental conditions (the "baseline"), so that the project's impacts can be meaningfully analyzed and compared to alternatives. (CEQA Guidelines § 15125(a); *see County of Amador v. El Dorado County Water Agency* (1999) 76 Cal.App.4th 931, 952; *Neighbors for Smart Rail v. LA County Metropolitan Transit Authority* (2013) 57 Cal.4th 310, 315.) The evidence provided in the DEIR's analysis of impacts to special status species, for reasons discussed below, does not meet this standard. O24-28

Additionally, CEQA has a substantive mandate and requires effective mitigation. "[P]ublic agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects." (Pub. Res. Code § 21002.) A mitigation measure is "feasible" if it is "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." (*Id.* § 21061.1.) CEQA requires mitigation measures to be "fully enforceable through permit conditions, agreements, or other measures." (*See id.* §21081.6(b); CEQA Guidelines § 15126.4(a)(2).) "Formulation of mitigation measures should not be deferred until some future time." (CEQA Guidelines § 15126.4(a)(1)(B).) O24-29

Specific details of a mitigation measure "may be developed after project approval when it is impractical or infeasible to include those details during the project's environmental review provided that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard and that will [be] considered, analyzed, and potentially incorporated in the mitigation measure.'" (*Golden Door Properties v. County of San Diego* (2020) 50 Cal.App.5th 467, 518.) The IS/MND fails to meet these requirements. O24-29 cont'd

CEQA requires agencies to adopt concrete, specific, and enforceable actions *before* an agency approves a project. (*California Clean Energy Committee v. City of Woodland* (2014) 225 Cal.App.4th 173, 186.) Agencies can only defer the formulation of mitigation measures where they first explain why doing so is necessary and practical under the circumstances. (*POET, LLC v. State Air Resources Bd.* (2013) 218 Cal.App.4th 681, 736-37.) "Fundamentally, the development of mitigation measures, as envisioned by CEQA, is not meant to be a bilateral negotiation between a project proponent and the lead agency after project approval, but rather, an open process that also involves other interested agencies and the public." (*Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 93; *see also San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 670 [EIR inadequate where the success or failure of mitigation efforts "may largely depend upon management plans that have not yet been formulated, and have not been subject to analysis and review within the EIR"].) For the reasons discussed below, the DEIR's proposed mitigation measures do not show the Project's risk to special status species will be substantially reduced, and therefore its less than significant finding is unsupported under CEQA. O24-30

A. Mojave Fringe-Toed Lizard

Mojave fringe-toed lizard (*Uma scoparia*) occurs exclusively on active desert sand dunes and associated sand ramp mosaics, resulting in a naturally discontinuous and highly fragmented distribution across the Mojave Desert. (Murphy et al. at 226.) Because individual dune systems function as isolated habitat units separated by geographic barriers such as mountains and areas lacking suitable sand, dispersal among populations is extremely limited or effectively nonexistent, and gene flow between dune systems is unlikely. Many local populations are small, with some estimated to contain fewer than 500 adults, and small or degraded dune patches cannot sustain viable populations over time, creating a significant risk of local extirpations. (*Id.*) Indeed, extirpations have been documented in El Mirage and Harper Dry Lakes, San Bernardino County, and at Lovejoy Buttes and Piute Butte, Los Angeles County. (*Id.*) Genetic studies show that populations in the Mojave River are genetically distinct, underscoring their unique conservation value. (*Id.* at 241.) As a result of its narrow habitat specificity, small population sizes, and heightened vulnerability to habitat fragmentation and local extirpation, the species is O24-31

designated by the California Department of Fish and Wildlife as a Species of Special Concern and requires careful consideration of both direct habitat loss and fragmentation impacts under CEQA. O24-31 cont'd

The DEIR does not disclose information essential for establishing a reliable baseline to assess the Project's impacts to Mojave fringe-toed lizards. The species was observed throughout dune habitat within the transload warehouse center portion of the BIG footprint, with the highest concentrations found in the central and northeastern portions of the BIG footprint. (DEIR 5.4-53.) However, the DEIR does not explicitly state how many individuals were observed within BIG's footprint or estimate the likely population impact from construction and operation of BIG. The DEIR further fails to evaluate the degree to which project construction, grading, dust, and fragmentation will eliminate, degrade, or isolate remaining habitat patches near the Project site. Disclosure of this information is essential for determining the Project's potential impacts and assessing whether mitigation is likely to be effective. O24-32

Although BIG will impact 1,009.1 acres of occupied dune habitat, the DEIR asserts the placement of a 500-foot conservation easement on either side of the Mojave River will provide suitable adjacent habitat that individual lizards disturbed by construction could access. (DEIR at 5.4-88.) But the DEIR contains several ambiguous and contradictory statements regarding this proposed easement, which undermine its impact analysis and mitigation measures and fail to satisfy CEQA's disclosure requirements. In the Biological Resources section, the DEIR refers to the conservation easement as "500 feet on either side of the Mojave River" (DEIR at 5.4-88, 90, 97.) However, without knowing the length of the easement, it is impossible to know the actual dimensions of the easement and therefore assess whether it will adequately mitigate impacts to disturbed wildlife, like Mojave fringe-toed lizards. In contrast, Appendix 5.4 states "a conservation easement will be placed over approximately 500 acres of the Mojave River floodplain." (At 136–37.) Additionally, the Project Description states BIG includes an "approximately 680-acre area at the northern boundary of the Specific Plan area that would remain ungraded (referred herein as the "Mojave River buffer"), *a portion of which* is proposed to be placed under a conservation easement." (DEIR at 3-8.) Notably, this fails to disclose how large the conservation easement will be. Taken together, the DEIR fails to sufficiently describe how big the conservation easement will be, its exact location, and the various habitat it will protect. Without this information, it is impossible to determine the value of the proposed easement to impacted wildlife. O24-33

Notwithstanding the confusing and contradictory language in the DEIR, if we assume that the 500-foot buffer on each side of the river is such that it comprises 500 acres, it would run 2178 feet (as 500 acres equates to 21,780,000 square feet). This is clearly insufficient to offset the 1009.1 acres of lizard habitat identified for destruction in the DEIR. Assuming 500 acres is the extent of the protected area, this would equate to roughly a 0.5:1 mitigation ratio. For a O24-34

species as imperiled as the Mojave fringe-toed lizard, a mitigation ratio of at least 3:1 (3027.3 acres) would be necessary. When also accounting for impacts of habitat fragmentation and disruption of sand source, the impact is far greater than 1009.1 acres, and proper mitigation would be on the order of 5000 acres or more. O24-34 cont'd

Moreover, habitat protection alone does not fully address the threats to the Mojave fringe-toed lizard. To properly disclose the effects of construction on this highly sensitive species, the DEIR must be revised to estimate and disclose the current population of Mojave fringe-toed lizards on and near the Project site, the actual size of the conservation easement, whether the population is viable in remaining/conserved habitat, and evaluate if the Project will eliminate or degrade movement between subpopulations in light of the species' fragmented distribution and heightened risk of extirpation, as well as impacts to the sand source that is necessary for long-term maintenance of suitable habitat. The DEIR fails on all fronts. O24-35

Additionally, the DEIR must fully disclose the Project's indirect impacts to Mojave fringe-toed lizards. It currently lacks assessment of whether construction of BIG will create new avian perching and hunting opportunities that increase predation impacts to the species. Given the extent of habitat disturbance proposed by BIG, increased predation opportunities could have a significant impact on the species. Nor does the DEIR analyze the impacts of BIG on sand movements that are necessary to maintain the active dune habitats upon which the lizards rely. Even if currently active dune habitat on or near the Project site is left undeveloped, construction of the Project may impair the sand source and the free movement of sand that is necessary to maintain actives dunes. (*See* Poppema et al., 2021, at 1.) O24-36

The measures currently proposed in the DEIR do not ensure that significant impacts to the Mojave fringe-toed lizard will be avoided, minimized, or mitigated to less than significant levels. MM BIG BIO-24 states:

> The implementing entity shall prepare a compensatory mitigation plan for direct impacts on Mojave fringe-toed lizard and 1,009.1 acres of occupied dune habitat (active desert dunes, stabilized and partially stabilized dunes, disturbed stabilized and partially stabilized dunes). Dune habitat shall be mitigated in-kind through the acquisition and preservation of dune habitat suitable for Mojave fringe-toed lizard at a minimum 1:1 ratio to offset permanent and temporary impacts on Mojave fringe-toed lizard habitat. O24-37

However, this proposed measure fails to mitigate potential impacts for several reasons. First, it does not address unique ecological and genetic value of the impacted population of Mojave fringe-toed lizard. Preserving dune habitat elsewhere will not remedy the loss and extirpation of the species in and near the Project site. This is particularly salient given that "the Mojave fringe-toed lizard population within the BIG footprint represents the western most extent

of the current known range of the species." (DEIR 5.4-53.) Accordingly, the DEIR must analyze whether preserving dune habitat within the Mojave River Watershed is feasible. If an analysis demonstrates the population will remain viable in proximity to BIG, habitat preservation should occur as close to the displaced and impacted population as possible to preserve its genetic and ecological value. Because dune habitat provides unique and irreplaceable ecological value, habitat acquisition and preservation should occur at a minimum 3:1 ratio to more adequately address the permanent loss of functionally irreplaceable habitat and the resulting reduction in connectivity between isolated populations, including the potential loss of the population adjacent to the Project site. O24-37 cont'd

B. Mojave Desert Tortoise

The Mojave desert tortoise is listed as threatened under the Endangered Species Act and Endangered under the California Endangered Species Act ("CESA"). (55 Fed. Reg. 12178 12191, 14 CCR § 670.5.) Importantly, on June 13, 2025, the California Fish and Game Commission proposed changing the regulatory language implementing CESA to uplist the Mojave desert tortoise from threatened to endangered. (CFGC, 2025.) The tortoise has also been the official State Reptile since 1972. (Assembly Bill 1089, Chapter 683, 1972.) Consequently, the Project's impacts to desert tortoises must be fully evaluated and disclosed to the public. (CEQA Guidelines, Appendix G subd. IV(d).) O24-38

Desert tortoises face numerous threats to their continued existence, as evidenced by the California Fish and Game Commission's decision to uplist the species to endangered earlier this year. (CFGC, 2025.) This decision noted that survival of the species is threatened by habitat destruction, predation, climate change, vehicle strikes, fencing, fire, as well as impacts from other species. (CFGC, 2025, 5–6.) Habitat destruction, reduced habitat connectivity, vehicle strikes, and raven predation are particularly relevant to the likely environmental impacts of the Project. O24-39

Raven populations dramatically increased in the desert over the last 25 years due to anthropogenic subsidization, resulting in increasingly disproportionate juvenile tortoise predation. (USFWS, 2022, at 22.) During the first 5–7 years of life, a tortoise's shell is soft and easy to puncture due to incomplete ossification. This makes juvenile tortoises vulnerable to predation by ravens. (Boarman, 2002, at 51.) Ordinarily, predation by native species alone would not threaten the species' survival. However, "predation pressure by ravens is increased through elevated raven populations as a result of resource subsidies associated with human activities" such as trash, artificial water sources, and nesting opportunities from human made structures. (USFWS, 2011, at 17.) The consequences are significant with raven populations increasing by 1,500% in the Mojave Desert over just two decades. (U.C. Davis Wildlife Health Center, 2005, at 105.) Even temporary construction activities increase raven density through augmented food O24-40

and water. (Boarman, 2002, at 13.) Research shows no increase in the proportion of juveniles in any tortoise conservation area, even with steep declines in adult numbers. (Allison & McLuckie, 2018, at 443.) This is likely due to intense raven predation. Thus, development in desert tortoise habitat with the potential to increase raven predation must be fully discussed and mitigated where feasible due to potential impacts on desert tortoise recovery. O24-40 cont'd

Additionally, habitat destruction and reduced habitat connectivity is one of the greatest threats facing the desert tortoise. Desert tortoises "do not coexist well with human development and disturbances." (USFWS, 2022.) Many of the activities first identified as destroying desert tortoise habitat have continued to impact the species. (*Id.*) In addition, energy development projects have increased. (*Id.*) This further causes habitat loss, fragmentation of populations, and damage to soil and vegetation. (*Id.*) O24-41

Fatal vehicle collisions are another significant cause of death for desert tortoises. One study reported a total of 115 tortoise carcasses along less than 29km of highway in the West Mojave. (Boarman, 2002, at 54.) While trafficked roads directly cause desert tortoise mortalities through collisions, they also indirectly impact the long-term persistence of local populations by fragmenting populations farther away from roads. (Averill-Murray et al., 2021, at 2.) O24-42

Many of these threats will be exacerbated by the Project, negatively impacting the survival of desert tortoises and therefore require full disclosure and, where feasible, mitigation. However, the DEIR does not sufficiently disclose essential information for establishing a reliable baseline to assess the Project's impacts to desert tortoises. The DEIR estimates that approximately two adult tortoises occupy the BIG footprint. (DEIR at 5.4-45.) This population estimate is based on scattered surveys that piecemealed together presence/absence estimates due to claimed constraints with timing authorizations. (Appendix 5.4 BIG-1 at 37.) While constraints on surveying due to access authorization may occur, their effect on population estimates is not discussed or analyzed, causing incomplete disclosure. Similarly, the DEIR acknowledges "some desert tortoise surveys were conducted outside the recommended seasonal survey window for protocol surveys" while failing to disclose the likely effect this had on population abundance. (*See* DEIR 5.4-17.) Conducting surveys outside the optimal activity period reduces detection probability and undermines the reliability of absence findings. Ultimately, it is the Project proponent's obligation to carry out adequate surveys, regardless of any access or other challenges they may face. The surveys relied upon in the DEIR are inadequate. O24-43

Further deflating the actual likely population abundance, the DEIR fails to clearly state that juvenile desert tortoises were not factored into the abundance calculation, instead placing this vital piece of information in an appendix. (Appendix 5.4 BIG-1 at 37.) Although omitting juveniles from the survey may be consistent with protocol, the fact additional juveniles are or may be on site must be highlighted and any effects to them analyzed to ensure the DEIR reflects O24-44

an accurate baseline. Considering these various deficiencies, the DEIR conflates a lack of observations with actual absence of desert tortoises on site. Even when live tortoises were not observed, such as during the 2021 survey and in the railyard area, Class 1 burrows were observed, demonstrating undetected species presence. (Appendix 5.4 BIG-1 at 93–94.) The DEIR ultimately fails to grapple with how the survey's methodological limitations affect impact determinations or mitigation adequacy. Accordingly, the DEIR fails to reflect an accurate baseline from which the Project's impacts to desert tortoises can be disclosed and mitigated. O24-44 cont'd

Additionally, the DEIR underestimates and minimizes the Project's impacts to desert tortoises by assuming mitigation will fully avoid significant effects, contrary to substantial evidence. Despite acknowledging that "[k]ey species affected include the desert tortoise" and that construction would "directly affect sensitive natural habitats such as desert dunes and riparian areas," the DEIR it concludes that "[w]ith mitigation efforts such as habitat preservation, relocation of species, biological monitors, and implementation of construction buffers, impacts would be reduced to less than significant." (DEIR at 5.4-2.) However, these mitigation measures fail to grapple with permanent habitat loss, habitat fragmentation, translocation mortalities, increased traffic collision risks, and ongoing predator subsidies. Habitat fragmentation and heightened risk of wildlife-vehicle collisions, discussed above, are especially consequential for desert tortoise because these stressors are documented to exacerbate population declines and push the species closer to extinction. (*See* USFWS, 2022; Boarman, 2002, at 54; Averill-Murray et al., 2021, at 2.) For the reasons noted above, neither risk is properly disclosed nor analyzed for feasible mitigation. O24-45

The proposed mitigation measures are inadequate and cannot support a less than significance finding. MM BIG BIO-14 states "a designated biologist shall prepare a BIG-specific Desert Tortoise Translocation Plan" but the mortality risks posed by potential translocation to individual tortoises are undisclosed. (DEIR MM BIG BIO-14 at 5.4-75.) MM BIG BIO-15 states "the implementing entity shall prepare a Raven Management Plan" and that the plan "may include" a list of measures "to be implemented during construction." (DEIR at 5.4-76.) This is inadequate mitigation because it lacks enforceable performance standards by granting the implementing agency total discretion in developing the Raven Management Plan. Additionally, the measure does not address whether raven mitigation will remain effective during operation of BIG, during which permanent structures will provide perch and nest sites and employees may create food and water subsidies for ravens. Without concrete and ongoing commitments to long-term mitigation measures, the DEIR fails to demonstrate that raven-related predation risk will be substantially reduced, and consequently its less than significant finding is unsupported under CEQA. O24-46

C. LeConte's and Bendire's Trasher

The DEIR's treatment of LeConte's and Bendire's thrashers is incomplete and inadequate. These two desert birds are among the most imperiled birds in the state, and are among North America's fastest declining bird species, with Bendire's having lost nearly 90% and LeConte's having lost almost 70% of their U.S. populations over the past 50 years. A 2025 U.S. State of the Birds report named both Bendire's and LeConte's thrashers as "Red Alert Tipping Point Species" since the species have each lost more than half their populations within the past 50 years and require urgent action to address continuing declines. Consequently, both species are on trajectories for listing under the federal and state Endangered Species Acts. O24-47

Both species are also difficult to survey and are often overlooked. LeConte's thrashers prefer sandy deserts where they forage on the ground for insects. The birds rarely fly, instead running on the ground with their tail cocked and scooting into brushy cover when threatened. LeConte's thrashers are nicknamed the "gray ghost" due to their elusive nature and pale sandy plumage that helps them blend into desert landscapes. Similarly, Bendire's thrashers are also secretive and spend much of their time foraging on the ground for insects. Male thrashers of both species are most noticeable during breeding season, when they perch on shrubs to sing high-pitched, melodious songs. Both thrasher species require large patches of flat land with desert scrub habitats and adequate prey to survive in their water-scarce environment, exactly the habitat types that will be destroyed by BIG. O24-48

Surveys on BIG failed to find Bendire's thrashers and the DEIR subsequently dismissed their potential presence on the footprint. However, because BIG's footprint contains both suitable nesting and foraging habitat for the species, and focused surveys specifically targeting thrashers were not conducted, Bendire's absence cannot be assumed. As such, the DEIR should have contained an analysis of BIG's potential impacts on the species, and included mitigation measures to offset those impacts. Moreover, the lack of adequate surveys means that the DEIR should be updated and recirculated after such surveys are actually conducted. O24-49

In contrast to Bendire's, LeConte's trashers were repeatedly observed during general bird surveys between 2021 and 2025, indicating that the area is important habitat for the species. BIG's footprint contains suitable nesting habitat, including saltbush and mesquite. Thus, the DEIR concludes LeConte's trashers may nest in the Project area. (DEIR at 5.4-52.) However, the DEIR does not provide any species-specific mitigation for LeConte's trasher beyond general nesting bird protections under MM BIG BIO-18. This mitigation measure exclusively focuses on vegetation removal during construction and fails to discuss the cumulative effects of habitat destruction and fragmentation. Such analysis is clearly required for this increasingly imperiled species. O24-50

The DEIR identifies LeConte's thrasher as a CDFW Species of Special Concern and USFWS Bird of Conservation Concern. (DEIR at 5.4-51.) While this is correct, the DEIR ignores the fact that LeConte's, as well as Bendire's thrasher, are under consideration for federal and state listing. Petitions seeking federal ESA listing were submitted in May 2025 for Bendire's thrasher and in July 2025 for LeConte's thrasher. Additionally, a CESA petition for the two species was submitted in September 2025. CDFW is scheduled to release its petition evaluation in January 2026, and both species are likely to become Candidates as of April 2026. As Candidates, take authorization for the Project will be needed for each species, and can only be authorized if the takings and resultant impacts are avoided, minimized, and fully mitigated. Additionally, CDFW cannot issue take permits for the Project absent legally adequate CEQA review, which is clearly lacking for these species. O24-51

For take of the thrashers to be fully mitigated, habitat mitigation at a ratio of 3:1 or higher will be necessary. The DEIR proposes only approximately 500 acres of habitat protection for the entire 5000-acre project. This is clearly inadequate, as approximately 15,000 acres of protected habitat will be needed to offset BIG's impacts to the LeConte's thrasher and other threatened, endangered, and candidate species. As such, in addition to the woefully inadequate mitigation proposed in the DEIR, a recirculated DEIR must also lay out in detail its plan for complying withthese mitigation requirements. O24-52

D. Western Burrowing Owl, Southwestern Willow Flycatcher, Western Yellow-Billed Cuckoo and Swainson's Hawk

The DEIR inadequately analyzes the impacts of construction and operational noise on special-status bird species known or likely to occur within or adjacent to the Project site, including western burrowing owl, southwestern willow flycatcher, western yellow-billed cuckoo, and Swainson's hawk. LeConte's and Bendire's thrashers, discussed above, would be similarly impacted by noise and vibration pollution.

Many studies demonstrate that high levels of anthropogenic noise harm wildlife and plants across diverse taxa, with heightened impacts to bird species. For example, field observations and controlled laboratory experiments show traffic noise can significantly degrade habitat value for migrating songbirds. (Ware et al., 2015.) Subjects exposed to 55 and 61 dBA (simulated traffic noise) exhibited decreased feeding behavior and duration, as well as increased vigilance behavior. (Ware et al. 2015.) Such behavioral shifts increase the risk of starvation, thus decreasing survival rates. Another study found a 28% decrease in bird abundance in areas when traffic noise was present compared to when there was no traffic noise. (McClure et al., 2013.) Chronic or long-term noise pollution can also impair foraging and anti-predator behavior, reproductive success, density, and community structure across diverse taxa. (Barber et al., 2010; Francis & Barber, 2013; Habib et al., 2007.) Even plants can be impacted by chronic noise O24-53

pollution. In a study conducted in New Mexico, continuous noise from natural gas wells was found to reduce tree seedling recruitment and evenness, likely due to noise altering the movement and behavior of seed-dispersing and pollinating wildlife. (Phillips et al., 2021.)

O24-53 cont'd

Although the DEIR acknowledges elevated noise levels during construction could result in "potentially significant direct impacts to avian nests through destruction and potential death, injury, or harassment of nesting birds," the DEIR concludes noise-related impacts to these species would be less than significant without reasoned analysis. (DEIR at 5.4-103.) Most of the noise related impacts focus on the construction phase, with little to no analysis of the cumulative effects of rail noise, traffic, and increased human activity over time. Instead, noise impacts are treated as a temporarily induced by construction. Substantiated discussion of vibration impacts from BIG's operation is similarly lacking. This fails to address species-specific sensitivity to noise and vibration, does not identify behavioral or reproductive disturbance thresholds, nor assess whether noise levels during breeding seasons could result in nest abandonment, reduced reproductive success, or displacement from otherwise suitable habitat.

O24-54

The proposed mitigation measures, including general construction best management practices and biological monitoring, do not directly reduce noise levels, include enforceable noise thresholds, nor ensure avoidance of critical breeding periods. Accordingly, they cannot support a finding of less-than-significance for noise impacts to these special-status birds. Additional analysis and, if feasible, mitigation measures are required to comply with CEQA's requirements.

O24-55

II. CONCLUSION

Thank you for the opportunity to submit comments on the Project. Given the possibility that the Center will be required to pursue legal remedies to ensure that the City of Barstow complies with its legal obligations including those arising under CEQA, we would like to remind the City of its statutory duty to maintain and preserve all documents and communications that may constitute part of the "administrative record" of this proceeding. (§ 21167.6(e); *Golden Door Properties, LLC v. Superior Court.,* 53 Cal.App.5th 733, 762-65 (2020).) The administrative record encompasses any and all documents and communications that relate to any and all actions taken by the City with respect to the Project and includes "pretty much everything that ever came near a proposed [project] or [] the agency's compliance with CEQA . . ." (*Cty. of Orange v. Superior Court,* 113 Cal.App.4th 1, 8 (2003).) The administrative record further includes all communications, including but not limited to all correspondence, emails, and text messages sent to or received by the City's representatives or employees, that relate to the Project, including any correspondence, emails, and text messages sent between the City's representatives or employees and the Applicant's representatives or employees. Maintenance and preservation of the administrative record requires that, *inter alia*, the City (1) suspend all data destruction

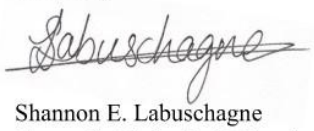
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policies; and (2) preserve all relevant hardware unless an exact replica of each file repository is made.

O24-56 cont'd

Please include the attorney listed below on Barstow's notice list for all future updates, notices, and materials associated with the Project and its environmental review, and do not hesitate to contact the Center with any questions at the email listed below.

Sincerely,



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RESPONSE TO COMMENT LETTER 24, CENTER FOR BIOLOGICAL DIVERSITY

O24-1 Commenter raises some concerns about the Draft EIR's analysis that are best addressed by sharing technical and scientific information, which is provided below. See **Consolidated Response 04** concerning general non-CEQA issues.

O24-2 This is a general comment that includes introductory remarks and serves to introduce more specific comments which are responded to in detail below. As a result, no specific response is provided here.

O24-3 See **Response O25-3.**

O24-4 This comment states the Center for Biological Diversity's (Center) concerns on the Draft EIR's analysis regarding greenhouse gases, wildlife connectivity, traffic and other impacts on special-status species. The comment also states that the Draft EIR must provide effective and enforceable mitigation measures for impacts found to be significant. The City acknowledges this requirement of CEQA and has accordingly prepared an extensive administrative record in support of the Draft EIR, including comprehensive expert data and information from the BIG Project proponent. The Draft EIR adequately analyzes potential project impacts to the resources identified in this comment letter in accordance with CEQA precedent and incorporates substantial mitigation requirements to reduce potential project impacts. Alternatives are analyzed in the Draft EIR in accordance with CEQA requirements. Detailed responses regarding each point of concern are provided below in response to subsequent comments. The commenter also states it joins and incorporates the written comments submitted by Earthjustice and California Department of Fish and Wildlife; the responses to those letters are also incorporated here.

O24-5 See **Consolidated Response 04** concerning general non-CEQA issues.

O24-6 This is a general comment that includes a summary of CEQA provisions and case law, and a general description of BIG. The Draft EIR provides a comprehensive analysis of the potential impacts that could be caused by BIG consistent with State CEQA Guidelines § 15151. No further response is required.

O24-7 See **Consolidated Response 04** concerning general non-CEQA issues.

O24-8 The comment states that the Draft EIR must include the carbon sequestration potential of habitats in the analysis of BIG's GHG impacts. The comment summarizes and cites studies regarding the carbon storage potential of California deserts, along with the physical features and vegetation species found in California deserts. The comment also summarizes information provided in the Draft EIR about the BIG footprint, vegetation communities and landcovers contained within the footprint, and some of the species contained within the footprint.

As stated in **Draft EIR Section 5.4: Biological Resources** (pages 30 through 32), the BIG footprint area totals approximately 5,000 acres supporting 15 vegetation communities and two land covers, with specific acreages and vegetation species enumerated in **Draft EIR**

Table 5.4-7: Summary of Vegetation Communities and Land Cover Within the BIG Footprint. (page 5.4-30) GHG emissions are analyzed in the Draft EIR in accordance with CEQA requirements (See **Draft EIR Section 5.8: Greenhouse Gas Emissions**). Neither State CEQA Guidelines § 15064.4 nor Appendix G require the assessment of carbon stock loss and future sequestration capacity as part of an EIR's GHG analysis or provide methodologies for assessing GHG impacts from land conversion. Although there is not a universally accepted methodology to calculate or model GHG emissions resulting from land conversion, GHG emission estimates associated with loss of vegetation are disclosed below for informational purposes.

An estimate of the annual loss in sequestration potential resulting from the vegetation that would be disturbed by BIG is summarized below in **Table 1: GHG Emissions from Project Land Conversion**. Vegetated communities from **Draft EIR Section 5.4 Table 5.4-7** (page 5.4-30) were split into three applicable classifications–shrubland, desert, and grassland–based on their descriptions and total acres disturbed for each classification was calculated from values provided in **Draft EIR Table 5.4-7**. (page 5.4-30) The acreage used here represents a conservative analysis because the total acreage contained in the footprint is used, rather than the maximum acres of permanent impacts, as provided in **Draft EIR Appendix 5.4 BIG-1 Biological Resources Technical Report** (pages 161-162). Sequestration rates for two of these classifications, shrubland and grassland, were obtained for the Mojave Desert Air Basin, in which the BIG footprint is located, from the California Emissions Estimator Model (CalEEMod 2022.1) Appendix G, Table G-42. The sequestration rate for the other classification, desert, was obtained from commenter-provided studies specific to the Mojave Desert (See **Response O24-9**) that are summarized in the Center for Biological Diversity report, *Hidden in Plain Site* (2023). Because only a range of values was provided, the average of that range was used in this analysis.

Table 1: GHG Emissions from Project Land Conversion

Classification[1]	**Area Disturbed (Acres)[1]**	**Sequestration Rate (MT Carbon/Year/Acre)[2]**	**Sequestration Potential ($MTCO_2e$/Year)[3]**
Shrubland	2,016.3	0.29	2,146
Grassland	321.5	0.46	543
Desert	1,587.9	0.46	2,652
Total Annual GHG Emissions from Land Conversion ($MTCO_2e$/Year)			**5,340**

MT = metric tons; CO_2e = carbon dioxide equivalent; Totals may not add up due to rounding

1. Species types, classifications, and acreages obtained from **Draft EIR Section 5.4: Biological Resources Table 5.4-7**.
2. Sequestration rates obtained for each available land cover type for the Mojave Desert Air Basin from CalEEMod Appendix G, Table G-42. Desert rates obtained from average of values from commenter-provided studies for the Mojave Desert, also reported in the Center for Biological Diversity report, *Hidden in Plain Site* (2023), available at https://www.biologicaldiversity.org/programs/urban/pdfs/Hidden-in-Plain-Sight-report.pdf.
3. Sequestered carbon converted to CO_2e using a mass conversion factor of 3.67, representing the ratio of the molecular weight of carbon dioxide to carbon.

As summarized in **Draft EIR Table 5.8-12**: **BIG GHG Emissions** (pages 5.8-62 through 5.8-63), BIG's net mitigated GHG emissions are -65,575, -51,719, and -26,155 metric tons of carbon dioxide equivalent ($MTCO_2e$) in the years 2028, 2033, and 2048, respectively. Annual

emissions due to loss of sequestration potential, as provided in **Table 1** above, are estimated to be approximately 5,340 $MTCO_2e$ per year. Therefore, even with consideration of GHG emissions associated with habitat loss, BIG's impacts would remain less than significant.

O24-9 The comment summarizes and cites specific studies regarding the carbon storage and sequestration potential of various habitat types. The comment states that the Draft EIR must account for loss of nature-based carbon storage and sequestration when assessing GHG impacts. The comment summarizes and cites specific studies regarding the storage and sequestration rates of desert areas in California and Nevada. See **Response O24-8** concerning project GHG impacts in the context of carbon storage and sequestration.

O24-10 The comment summarizes and cites vegetation types and acreages that BIG would disturb, as provided in the Draft EIR. The comment states that the Draft EIR did not adequately identify the acres of vegetation that BIG would disturb and omitted this information in the Draft EIR text, opting to include in **Draft EIR Appendix 5.4 BIG-1** instead. The comment states that BIG would result in GHG emissions associated with land conversion. The comment states that the Draft EIR does not assess or quantify GHG impacts associated with land conversion and that the Draft EIR must be revised to disclose, analyze, and mitigate, if feasible, these impacts.

As noted in **Consolidated Response 13** concerning speculation without substantial evidence and requests for additional analysis and study, commenters are advised to support assertions that the lead agency should conduct additional analysis or review with data or other factual references. This is because the lead agency's CEQA conclusion must be based on substantial evidence in the record and not speculation. Here, the commenter has not pointed to any facts or data that support its contention that the Draft EIR's analysis is flawed. Nonetheless, in addressing commenter's concerns, it should be noted that **Draft EIR Appendix 5.4 BIG-1**, the Wildlife Movement Study is part of the Draft EIR. Consistent with State CEQA Guidelines § 15147, detailed technical data and supporting analyses are appropriately included in an appendix, while the Draft EIR text provides a summary-level discussion sufficient to support informed decision-making. The inclusion of detailed study results in **Draft EIR Appendix 5.4, BIG-1**, is consistent with the State CEQA Guidelines, professional industry standards for CEQA documentation and does not constitute an omission of relevant information. The Draft EIR text directly identifies acres of vegetation contained within the BIG footprint in **Draft EIR Section 5.4: Biological Resources Table 5.4-7**. (page 5.4-30) See **Response O24-8** for concerning GHG impacts in the context of carbon storage and sequestration. See also **Consolidated Response 03** concerning recirculation of the Draft EIR.

O24-11 The comment summarizes and cites specific studies regarding wildlife corridors, edge effects, and the potential effects of development on wildlife movement and connectivity. The Draft EIR recognizes these concepts, citing similar supporting literature, and evaluates potential project impacts on wildlife movement and connectivity consistent with CEQA requirements. A specific comment on the Draft EIR's biological analysis is not provided. More detailed, project-specific concerns regarding wildlife connectivity are addressed in response to subsequent comments.

O24-12 The comment summarizes and cites specific studies regarding the effects of habitat fragmentation and landscape connectivity on plant communities, biodiversity, and climate change resilience. The Draft EIR recognizes these ecological principles and evaluates BIG's potential impacts on biological resources, including habitat fragmentation and connectivity, consistent with CEQA requirements. This comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. The comment is acknowledged for the record and would be forwarded to the decision-making bodies as part of this Final EIR for their consideration in reviewing BIG and the EIR. A specific comment on the Draft EIR's biological analysis is not provided. Project-specific concerns are addressed in response to subsequent comments.

O24-13 The comment summarizes and cites specific studies regarding how development can act as barriers to wildlife movement and contribute to habitat loss and fragmentation. The Draft EIR recognizes these issues and evaluates BIG's potential effects on wildlife movement, habitat fragmentation, and connectivity consistent with CEQA requirements (See **Draft EIR Section 5.4.2**). This comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. The comment is acknowledged for the record and would be forwarded to the decision-making bodies as part of this Final EIR for their consideration in reviewing BIG and the EIR. Project-specific concerns are addressed in response to subsequent comments.

O24-14 The comment provides information regarding the importance of ecological connectivity for biodiversity conservation and climate change adaptation. This comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. The comment is acknowledged for the record and would be forwarded to the decision-making bodies as part of this Final EIR for their consideration in reviewing BIG and the EIR. Project-specific concerns are addressed in response to subsequent comments.

O24-15 The comment asserts that the Draft EIR minimizes the importance of the BIG Project site for wildlife connectivity and fails to incorporate the findings of the Wildlife Movement Study. The Draft EIR fully incorporates the study and relies on its findings to inform both the analysis of impacts and the development of mitigation measures. As described in the **Draft EIR Appendix 5.4 BIG-1,** the Wildlife Movement Study was conducted specifically to evaluate wildlife movement and connectivity across the project site. The study documented general and localized use of the site by resident terrestrial species and evaluated how existing infrastructure influenced wildlife movement within the project site. These findings directly informed the Draft EIR's conclusions regarding wildlife movement impacts and the design of mitigation measures, including **MM BIG BIO-32**. **MM BIG BIO-32** requires BIG construction to include a wildlife crossing at Mile Post 12.5 to facilitate wildlife movement through the BIG footprint Additional discussion of the study and its application in the Draft EIR is provided in **Responses S8-57** through **S8-68**. The Draft EIR also evaluates the project site within a regional context, identifying connections to the Mojave River corridor, CEHC Potential Riparian Connections, the California Desert Linkage Network, and Mojave River–Barstow/Camp Cody

Linkage. References to existing development, infrastructure, and barriers to wildlife movement reflect baseline environmental conditions, as required under CEQA for the environmental setting (State CEQA Guidelines § 15125). See also **Response 024-16**.

O24-16 The comment asserts that the Draft EIR understates the project site's role in wildlife connectivity by referencing existing barriers and by stating that portions of the project site "may" facilitate wildlife movement. The Draft EIR does not minimize the connectivity value of the project site. As described in the **Draft EIR Appendix 5.4 BIG-1**, the Wildlife Movement Study documents that local wildlife use the project site for movement. **Draft EIR Section 5.4: Biological Resources** and **Appendix 5.4 BIG-1** also evaluate the site within a regional connectivity context, identifying nearby and intersecting linkage features including the Mojave River corridor, based on review of existing scientific literature and publicly available wildlife connectivity mapping and modeling.

The use of the term "may" reflects the inherent variability and species-specific nature of wildlife movement patterns consistent with standard ecological writing about qualitative observations in the absence of in-depth research. This language does not discount or diminish the documented use of existing culverts, channels and other site features by local, resident wildlife species moving across the project site. Based on site-specific surveys and the Wildlife Movement Study, the Draft EIR concludes that with the implementation of mitigation measures such as **MM BIG BIO-32**, project impacts on wildlife connectivity would be reduced to less-than-significant levels. **MM BIG BIO-32** requires BIG construction to include a wildlife crossing at Mile Post 12.5 to facilitate wildlife movement through the BIG footprint.

References to existing development, infrastructure, and physical barriers describe baseline environmental conditions, as required under CEQA for the environmental setting (State CEQA Guidelines § 15125), and provide the context necessary to evaluate project-specific incremental and cumulative effects. Acknowledging existing fragmentation does not discount or minimize the ecological function of the site; rather, it ensures that the analysis accurately evaluates the degree to which BIG would impact wildlife movement. Accordingly, the Draft EIR is not misleading or does not minimize Project impacts.

O24-17 The comment asserts that the Draft EIR omits findings from the Wildlife Movement Study because the study is included in **Draft EIR Appendix 5.4 BIG-1** rather than fully restated in the Draft EIR text. The Wildlife Movement Study is an integral component of the Biological Resources Technical Report and Draft EIR and were prepared specifically to inform the analysis of wildlife movement and connectivity for the BIG Project. Its inclusion in the Draft EIR record and analysis as a technical attachment that supports the Draft EIR analysis is a standard CEQA practice. The Draft EIR and Biological Resources Technical Report incorporate the study's findings in its description of existing conditions, impact analysis, and development of mitigation measures related to wildlife movement and habitat fragmentation, including conclusions regarding wildlife use of the project site. Consistent with State CEQA Guidelines § 15147, detailed technical data and supporting analyses are appropriately included in an appendix, while the Draft EIR text provides a summary-level discussion sufficient to support informed decision-making. The inclusion of detailed study results in **Draft EIR Appendix 5.4**

BIG-1 is consistent with the State CEQA Guidelines, professional industry standards for CEQA documentation and does not constitute an omission of relevant information or that the Draft EIR did not include or account for the Study's findings.

With respect to the comment about Lenwood Channel, See **Response S8-59.**

While the Wildlife Movement Study acknowledges that wildlife movement within the Mojave River corridor could be studied further, it does not conclude that such information is necessary to adequately evaluate BIG's impacts. Field surveys focused on accessible portions of the project site, and the Study documents camera locations to identify the areas evaluated. The Study explains that data were collected from representative locations within the project site to characterize wildlife movement patterns relevant to the project site. Moreover, CEQA does not require that an agency conduct every recommended test and perform all recommended research in evaluating a project's environmental impacts. (State CEQA Guidelines § 15204(a).) Even if an additional study or survey may be helpful, it does not mean it is required under CEQA.[124] The observation in the Study regarding further studies that could be conducted does not mean the findings in the Study and the Draft Study are unsupported or invalid. See also **Consolidated Response 13** concerning speculation without substantial evidence and requests for additional analysis and study.

The Draft EIR relies on this site-specific information, together with regional connectivity datasets and mapping of known wildlife corridors intersecting the project site, to evaluate potential impacts on wildlife movement. This approach provides an appropriate and defensible analytical framework for assessing project-related effects in context. Consistent with CEQA, environmental analyses may rely on the best available scientific information where direct survey data are limited and not specifically required per a responsible agency protocol. In this case, both database and site-specific data collection were utilized to inform the analysis.

See **Responses S8-58** through **S8-61, S8-63,** and **S8-64** for additional discussion regarding the Wildlife Movement Study.

O24-18 The comment asserts that the Draft EIR does not analyze impacts on the Mojave River corridor; however, this concern does not reflect the analysis provided in the Draft EIR. As noted in **Consolidated Response 13** concerning speculation without substantial evidence and requests for additional analysis and study, commenters are advised to support assertions that the lead agency should conduct additional analysis or review with data or other factual references. This is because the lead agency's CEQA conclusion must be based on substantial evidence in the record and not speculation. Here, the commenter has not pointed to any facts or data that support its contention that the Draft EIR's analysis is flawed. Nonetheless, in addressing commenter's concerns, impacts on the Mojave River corridor are evaluated in **Draft EIR Appendix 5.4 BIG-1 Section 6.0: Impact Analysis** The analysis concludes that direct impacts on the Mojave River would be avoided. As stated in the Biological Resources Technical Report, the BIG footprint entirely avoids the Mojave River corridor except for improvements

[124] *Association of Irritated Residents v. County of Madera* (2003) 107 Cal.App.4th 1383, 1396.

to the existing Hinkley Road Bridge, and BIG is placing a Conservation Easement of approximately 545 acres within and adjacent to the Mojave River. This would allow for wildlife movement and connectivity to be maintained unimpeded in perpetuity along this stretch of the river. **Draft EIR Appendix 5.4 BIG-1 Section 6.0 – Impact Analysis** acknowledges that indirect impacts on biological resources, including regional wildlife corridors could occur due to elevated noise, dust, and lighting; site runoff into aquatic resources; and the potential introduction of invasive, non-native plant species (see **Draft EIR Section 5.4**). The Draft EIR identifies and requires implementation of the following measures to address these potential indirect impacts and reduce them to a less than significant level: **GPU NOI-1**, **MM BIG AQ-1**, **MM BIG BIO-6**, **MM BIG BIO-8**, and **MM BIG BIO-30**. Collectively, these measures minimize the likelihood that nearby construction or operations would impair the broader function of the Mojave River as a wildlife movement corridor. The comment also asserts that the Draft EIR does not adequately analyze impacts on American beaver. The Draft EIR evaluates American beaver observations within and near the project site using the best available scientific information, including records from the California Natural Diversity Database (CNDDB), iNaturalist, and an observation of American beaver in the Mojave River by Rocks Biological. As documented in the Biological Resources Technical Report, one American beaver was observed swimming upstream near the project site. The Draft EIR explains that American beaver is unlikely to dwell for extended periods within the portion of the Mojave River immediately adjacent to the project site due to the lack of permanent surface water. The term "dwell" is used to describe relatively long-term residency and does not suggest that American beaver does not intermittently or seasonally use the Mojave River corridor for movement or dispersal.

MM BIG BIO-25 addresses potential impacts on American beaver by restricting construction activities within the Mojave River corridor to the dry season when surface water is absent, to the greatest extent feasible. If construction must occur outside of the dry season, biological monitors would conduct daily pre-construction sweeps within proximity of direct impact areas. If American beaver is observed, construction activities would not begin until the individuals have moved from the area, and work may only resume once the biologist confirms that the species is no longer present. These measures are designed to avoid direct harm to beavers. Potential indirect impacts to their use of the Mojave River corridor, including edge effects from operational noise, lighting, dust, runoff, and invasive species introduction would be reduced to less than significant with adherence to the required measures GPU NOI-1 (noise attenuation best practices), **MM BIG AQ-1** (fugitive dust control), **MM BIG BIO-8** (Nighttime Construction and Lighting Plan), **MM BIG BIO-30** (Storm Water Pollution Prevention Plan), and **MM BIG BIO-6** (Adaptive Weed Control Plan). As discussed above, there would be no habitat loss to American beavers because of BIG and 545 acres of potential movement corridor for beavers and other riparian species would be conserved within the Mojave River corridor by the Project site.

O24-19 The comment asserts that the Draft EIR understates potential impacts of permanent security fencing on wildlife connectivity and alleges that the details of the fencing plans are undisclosed and unanalyzed. CEQA does not require that the Project Description include all

final engineering designs and details, but only a "general description" of the technical aspects of a project with sufficient detail to enable the public and the decisionmakers to understand the environmental impacts of the proposed project.[125] Although specific fence alignments and final design and engineering details have not yet been finalized, CEQA does not require the Draft EIR to include final engineering designs. Rather, CEQA requires a reasonably detailed analysis of fencing impacts and identification of feasible, enforceable mitigation measures to reduce impacts to less than significant levels. See also **Consolidated Response 12-01** concerning Project Description under CEQA.

MM BIG BIO-34 establishes clear and enforceable requirements for the review, design, installation, and ongoing maintenance of permanent security fencing adjacent to natural habitat areas. Furthermore, **MM BIG BIO-34** requires that the final fencing design be reviewed and approved by a CDFW-approved Designated Biologist to ensure that fencing functions as an effective barrier preventing wildlife access to hazardous portions of BIG while avoiding unnecessary impediments to movement outside secured areas. The measure specifies fencing design elements, including fine-mesh fencing extending below- and above-grade to prevent passage by special-status reptiles and mammals, including desert tortoise, and includes provisions to prevent digging, tunneling, climbing, or other means of wildlife passage through or over the fencing. The measure further requires quarterly inspections and maintenance to ensure the fencing remains effective and protective after implementation. The measure also allows for flexibility to comply with FESA, CESA, and other regulatory permit requirements from USFWS and CDFW, ensuring that the fencing is protective of wildlife while consistent with applicable law.

Through the analysis of wildlife connectivity issues in **Draft EIR Appendix 5.4 BIG-1 Section 6.0: Impact Analysis** and incorporation of enforceable mitigation under **MM BIG BIO-34**, the Draft EIR adequately discloses and evaluates the potential impacts of permanent security fencing on wildlife connectivity and reduces those impacts to less than significant.

The comment also summarizes the previous comments to generally contend that the Draft EIR minimizes BIG's impacts on wildlife connectivity, relies on an improper baseline and fails to mitigate for impacts. As explained in this response and **Responses O24-15** through **O24-18**, the Draft EIR adequately discloses and evaluates BIG's potential impacts on wildlife connectivity and identifies mitigation to reduce those impacts to less than significant. Accordingly, the Draft EIR does not need to be revised and no recirculation is required. See also **Consolidated Response 03** concerning recirculation of the Draft EIR.

O24-20 This comment summarizes CEQA's general provisions and the Draft EIR's findings and conclusions related to wildlife movement and connectivity and serves to introduce more specific comments which are responded to in detail below. As a result, no specific response is provided here. Specific comments regarding wildlife connectivity mitigation are further addressed in **Responses O24-21** through **O24-23** below.

[125] *Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20, 36; State CEQA Guidelines § 15124(c).

O24-21 The comment asserts that **MM BIG BIO-32**, which provides a wildlife crossing at Milepost 12.5, is insufficient to mitigate impacts associated with the removal of five existing culverts and crossings within the interior portions of the BIG rail yard (i.e., within the ancillary rail area, block swap yard, and intermodal facility portion of the project site). As discussed in **Response S8-58, S8-59, S8-61, S8-63, S8-64**, and **S8-66**, **MM BIG BIO-32** has been refined based on input received to clarify that it consists of multiple coordinated components: (1) a wildlife crossing beneath the BNSF railway at Milepost 12.5, (2) a separate wildlife crossing beneath National Trails Highway, and (3) wildlife movement enhancements associated with the widened Lenwood Channel.

This comment raises two specific concerns related to the reduction in available crossing structures. First, it asserts that removal of five existing culverts and crossings at Mileposts 10.9, 10.06, 8.9, 8.2, and 7.0 would reduce the likelihood that wildlife would locate and use a crossing with the same frequency as under existing conditions. As documented in the Wildlife Movement Study, the species observed using these existing structures are primarily common, resident wildlife species. Following project implementation, the areas surrounding these interior crossings would be converted to active rail yard facilities, where natural habitat would be removed and ongoing operations would substantially reduce the suitability of these locations for wildlife movement. Under these conditions, continued use of the existing interior culverts as functional wildlife crossings would be unlikely and their effectiveness would be substantially diminished due to land use changes rather than solely the removal of the structure themselves.

Second, the comment asserts that consolidating wildlife movement into a single crossing could increase predator‑prey interactions and deter use by certain species, such as kit fox. The City and BIG Project proponent acknowledges this concern and has coordinated with CDFW regarding potential species-specific responses and interactions. In response, the revised **MM BIG BIO-32** (see **Response S8-66**) incorporates CDFW's recommendations regarding inclusion of structural cover elements (e.g., rocks, boulders, and woody shelters), where feasible, within wildlife crossing structures. These features are intended to provide visual screening and refuge opportunities for smaller or more predator-averse species, reduce potential avoidance behavior, and encourage use by a range of species.

The comment focuses on the loss of five existing culverts within the interior rail yard portion of the project site but does not account for conditions along the lead track extension. In these areas, existing drainage culverts would be improved, enlarged, or supplemented with additional culverts where none currently exist. Although these structures are not designed specifically as wildlife crossings, they may continue to function as incidental movement pathways, consistent with existing conditions, although they are not relied upon as mitigation for wildlife connectivity impacts.

In addition, there is currently no wildlife crossing beneath National Trails Highway in the vicinity of the project site. As noted in **Response S8-58**, wildlife currently cross over this roadway under existing conditions despite the absence of designated crossing structures, which presents an ongoing collision risk. The inclusion of a wildlife crossing beneath National

Trails Highway as part of the revised **MM BIG BIO-32** introduces a new, safer opportunity for wildlife movement relative to existing conditions and is intended to facilitate wildlife passage along this transportation corridor.

MM BIG BIO-32 was designed based on the findings of the Wildlife Movement Study, engineering feasibility, and agency coordination. The Milepost 12.5 crossing is strategically located to facilitate connectivity across the BNSF railway, provide a new safe crossing beneath National Trails Highway where none currently exists, and enhance linkage between adjacent open space areas and the Mojave River corridor. The Draft EIR reasonably concludes based on substantial evidence that, with implementation of **MM BIG BIO-32** in combination with other mitigation measures, impacts on wildlife connectivity would be reduced to less than significant.

O24-22 The comment asserts that ongoing operational effects, including noise, dust, and nighttime lighting, could reduce wildlife use of movement corridors, and suggests that **MM BIG BIO-32** alone may be insufficient to address these broader impacts. However, the comment does not provide supporting evidence for this conclusion. In addition, this concern appears to be based on the assumption that the Draft EIR relies solely on **MM BIG BIO-32** to mitigate operational impacts on wildlife movement. As noted in **Consolidated Response 13** concerning speculation without substantial evidence and requests for additional analysis and study, commenters are advised to support assertions that the lead agency should conduct additional analysis or review with data or other factual references. This is because the lead agency's CEQA conclusion must be based on substantial evidence in the record and not speculation. Here, the commenter has not pointed to any facts or data that support its contention that the Draft EIR's analysis is flawed. Nonetheless, in addressing commenter's concerns, as described in **Draft EIR Appendix 5.4 BIG-1 Section 6.0: Impact Analysis**, potential indirect impacts associated with noise, dust, and nighttime lighting are addressed through multiple required mitigation measures, including **MM GPU NOI-1** (noise attenuation best practices), **MM BIG AQ-1** (fugitive dust control), **MM BIG BIO-6** (Weed Control Plan), **MM BIG BIO-8** (Nighttime Construction and Lighting Plan), and **MM BIG BIO-37** (Nighttime Lighting During Operations). As further described in **Draft EIR Appendix 5.4 BIG-1 Section 6.0: Impact Analysis,** these measures reduce BIG's impacts concerning noise, light, and dust pollution to less than significant levels, so that no additional measures are required under CEQA to address these impacts.

MM BIG BIO-32 addresses physical connectivity across major transportation barriers including the BNSF railway and National Trails Highway, while the above measures collectively reduce the broader operational stressors that could affect wildlife use of movement corridors, including the Milepost 12.5 crossing and Lenwood Channel. As described in **Response S8-59**, enhancements to the widened Lenwood Channel are included to help buffer and maintain its function as a wildlife movement corridor in the eastern portion of the project site to the extent feasible.

In addition, the Milepost 12.5 crossing location was selected based on site-specific wildlife movement data, engineering feasibility, and proximity to adjacent open space, and is located

outside BIG's most intensively developed portions where operational noise and lighting would be greatest. The siting reduces potential disturbance at the crossing relative to interior rail yard areas.

With respect to the comment's suggestion that additional corridors be protected or created to reduce impacts on existing wildlife corridors and movement, the commenter does not identify a specific proposal for such corridor. Because measures to reduce indirect impacts on wildlife movement and corridors to a less than significant level are already addressed in **Draft EIR Appendix 5.4 BIG-1 Section 6.0: Impact Analysis**, the protection or creation of additional corridors is not necessary to reduce those indirect impacts. As previously discussed, Lenwood Channel would maintain its function as a wildlife movement corridor during BIG operations. Additionally, the wildlife crossing structures at Milepost 12.5 are within a project area that balances maximum feasibility for construction and suitability for wildlife movement during BIG operations. These two distinct corridors, as shown on **Draft EIR Figure 3-28: BIG Off-Site Improvements, West** (page 3-75) and **Figure 3-29: BIG Off-Site Improvements, Central** (page 3-76), provide well-spaced movement opportunities through the constructed project area. Therefore, the protection or creation of additional corridors is not warranted as the functions of proposed crossing structures and corridors would be sufficient to support wildlife movement during BIG operations.

Furthermore, under CEQA, the lead agency is not required to adopt mitigation that would avoid *all* potential impacts (i.e., have no impact at all).[126] Rather, CEQA permits mitigation measures that would substantially lessen the significant environmental effects of the project. (Pub. Resources Code § 21002) ["`[M]itigation need not account for every square foot of impacted habitat to be adequate. What matters is that the unmitigated impact is no longer significant.'"].) As a result, CEQA does not require that wildlife movement be maintained at baseline levels (i.e., no impact); rather it requires evaluation of whether a project would substantially impede wildlife movement and the implementation of feasible measures to avoid or reduce such effects to a less than significant level. Based on the BIG Project-specific analysis and implementation of the required mitigation measures, the Draft EIR reasonably concludes based on substantial evidence that indirect operational effects on wildlife movement corridors would be reduced to a less than significant level. Accordingly, the Draft EIR does not need to be revised to include additional analysis or mitigation measures.

O24-23 The comment states that **MM BIG BIO-34**, which addresses permanent security fencing, would not maintain, restore, or facilitate wildlife movement and improperly defers final fencing design. However, the Draft EIR does not support this interpretation. The Draft EIR appropriately evaluates and includes **MM BIG BIO-34** as a prescriptive mitigation measure.

As noted in **Consolidated Response 13** concerning speculation without substantial evidence and requests for additional analysis and study, commenters are advised to support assertions that the lead agency should conduct additional analysis or review with data or other factual references. This is because the lead agency's CEQA conclusion must be based on substantial

[126] *Save the Hill Group v. City of Livermore* (2022) 76 Cal.App.5th 1092, 1117.

evidence in the record and not speculation. Here, the commenter has not pointed to any facts or data that support its contention that the Draft EIR's analysis is flawed. Nonetheless, in addressing commenter's concerns, as explained in **Response O24-19**, with respect to the design of the security fencing, CEQA does not require that the project description include all final engineering designs and details, but only a "general description" of the technical aspects of a project with sufficient detail to enable the public and the decisionmakers to understand the environmental impacts of the proposed project.[127] (See State CEQA Guidelines § 15124(c).) See also **Consolidated Response 12-01** concerning Project Description requirement under CEQA.

Furthermore, **MM BIG BIO-34** is not improperly deferred mitigation. CEQA requires that an EIR identify ways in which significant environmental impacts can be lessened in severity or avoided, including by the adoption of feasible and effective mitigation measures (State CEQA Guidelines §15126.4). To this end, mitigation measures must reduce the severity of potentially significant impacts, their effectiveness must be clear, and they must be enforceable (State CEQA Guidelines § 15126.4(a)). Although formulation of mitigation measures cannot be deferred until some future time, State CEQA Guidelines § 15126.4(a)(1)(B) provides that the specific details of a mitigation measure may be developed after project approval when it is impractical or infeasible to include those details during the project's environmental review, provided that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation would achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard that would be considered, analyzed, and potentially incorporated in the mitigation measure. Also see **Consolidated Response 05-07** concerning the use of performance standards and deferred mitigation.

The Draft EIR fully complies with requirements for **MM BIG BIO-34**, which is sufficiently detailed and specific to allow meaningful review, lead agency conclusions per significance criteria, and enforceability. As described in revised **MM BIG BIO-34** per **Response S8-67**, CDFW and USFWS would have additional review and approval authority over final fencing plans as part of the CESA ITP and Section 7 consultation processes. This is consistent with the State CEQA Guidelines because it is not deferred mitigation to require coordination with the agencies with expertise on these issues.[128, 129]

MM BIG BIO-34 includes detailed, enforceable design standards to prevent wildlife from entering hazardous areas of the project site while minimizing impacts to wildlife connectivity. These standards include, but are not limited to, below-grade aprons extending at least 12 inches into the soil, above-grade barriers at least 12 inches high, outward-angled aprons to prevent burrowing, and climber barriers at the top of the fence to prevent access by wildlife. Prior to installation a CDFW-approved biologist must review and approve final fencing design

[127] *Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20, 36.

[128] *Clover Valley Foundation v. City of Rocklin* (2011) 197 Cal.App.4th 200, 237 [requirement that permits be obtained from CDFW served as performance standards supporting agency's determination that impact to listed species and its habitat would be mitigated].

[129] *Defend the Bay v. City of Irvine* (2004) 119 Cal.App.4th 1261, 1276 [requirement to consult with the USFWS and CDFW not improper deferred mitigation].

to ensure these specifications are met. **MM BIG BIO-34** further requires ongoing inspection and maintenance of fencing and repairs implemented as needed, to maintain functionality. While movement into the BIG project site would be restricted to reduce wildlife mortality, connectivity is supported through designated crossing features and access to adjacent open space areas.

In combination with **MM BIG BIO-32**, Lenwood Channel enhancements, and other applicable mitigation measures, **MM BIG BIO-34** provides enforceable mitigation that reasonably reduces project-related impacts on wildlife while supporting safe and functional movement through adjacent areas. Accordingly, the Draft EIR adequately analyzes fencing-related impacts and includes feasible mitigation sufficient to reduce impacts to less than significant. Revisions to the measure per **Response S8-67** as discussed above ensure additional regulatory agency input regarding details of the final design plans that require their approval. No further revisions to **MM BIG BIO-34** are necessary based on this comment.

O24-24 The comment states that the Draft EIR's traffic analysis does not adequately address the potential increases in train and truck traffic from BIG operations and resulting effects on biological resources. The Draft EIR evaluates these issues and identifies operational features and mitigation measures designed to minimize vehicle traffic and associated biological impacts. As described in **Draft EIR Section 3.0**, one of BIG's primary objectives is to reduce truck traffic by moving goods by rail. By increasing the proportion of freight transported by rail, BIG would reduce overall truck vehicle miles traveled relative to existing movement patterns. Within the project site, operational vehicle traffic would be minimized through several design features including the following: 1) containers would be transported between the rail yard and transload warehouse center using a limited number of electric hostlers rather than heavy-duty trucks; 2) transportation would only take place via a private, closed-off loop roadway to minimize vehicle traffic during operations; and 3) site entries, exits, parking lots, and pedestrian pathways would allow customers, employees, and emergency vehicles to navigate through the closed-loop system easily.

Small mammals (i.e., kit fox, coyote) are expected to be able to continue crossing the existing railway and National Trails Highway during operations.

To further accommodate wildlife crossing without the potential conflict with vehicular or train traffic, BIG proposes an underground wildlife crossing under National Trails Highway west of the existing Hinkley Road, shown on **Draft EIR Figure 3-28: BIG Off-Site Improvements, West** (page 3-75). Inclusion of this crossing in BIG is an improvement to existing conditions where wildlife currently cross over the road unprotected and are subject to vehicle strikes as documented in the Wildlife Movement Study attached to the Draft EIR. Enhancements for wildlife would be incorporated into the crossing design as required by revised **MM BIG BIO-32** as discussed in more detail in **Response O24-21** above. This underground crossing is intended to facilitate safe wildlife movement without interaction with vehicular or rail traffic. Based on these project design features and the wildlife movement analysis, the Draft EIR reasonably concludes based on substantial evidence that operational traffic associated with BIG would not result in adverse impacts on biological resources.

O24-25 This comment reflects a conflation of two separate statements made in different parts of the Draft EIR. The first statement, which was part of the explanation for the future baseline train noise levels at sensitive receptors used for the EIR's noise analysis, is merely an acknowledgment of the ambient growth that is anticipated (and planned for) across the country and region in both population and the demand in the movement of freight and logistics services: "Train activity along the existing mainlines in the vicinity of BIG is anticipated to increase approximately 1.0-2.5 percent annually without BIG (ENSAFE, 2025), and thus, future baseline train noise levels at sensitive receptors would also increase." As noted, this statement is substantiated based on reference to Assumptions and Methodologies Associated with the Barstow International Gateway ("BIG") Corridor Emissions Modeling for Project Analysis Years 2028, 2033, and 2048. As demand increases, frequency and volume of train traffic would increase. The second statement is taken from a general project overview for BIG: "By moving freight off the roads and onto rail, BIG reduces passenger vehicle miles traveled and truck miles traveled and improves congestion in heavily urbanized areas in the Inland Empire and near the Ports and on highway systems throughout the region." These statements are not contradictory and do not have to be revised, and the Draft EIR's analysis of BIG's potential impacts are not affected by the inclusion of both statements in the EIR.

O24-26 The comment asserts that while BIG would increase traffic, the Draft EIR fails to address how an increase in local traffic would impact wildlife, and that the EIR should disclose the local truck trips generated by BIG and the routes they would use. BIG would result in an overall decrease in heavy-duty truck trips as discussed in detail in **Draft EIR Section 5.15: Transportation**. **Draft EIR Section 5.15** also includes truck route exhibits. Total project trip generation by vehicle type is disclosed in **Draft EIR Appendix 5.15 BIG-2**. The trips that would be generated by BIG would travel along existing roadways. Vehicle traffic in these areas occur under existing conditions and implementation of BIG would not result in vehicle traffic occurring in locations where it did not previously occur. As such, BIG would not create new conditions with respect to vehicle traffic in areas where wildlife occurs, and BIG would not be required to establish exclusion fencing across all public roadways. Further, the analysis of wildlife-vehicle collision risk is not specifically required under CEQA. See **Response O24-27**.

O24-27 The comment asserts that without quantifying truck trips and analyzing routes and wildlife collisions, the Draft EIR cannot assess whether local traffic would substantially increase wildlife mortality on roadways. Commenter poses a hypothetical example is given of a truck driving on a road without desert tortoise exclusion fencing and states how this could potentially result in significant impacts on the species. CEQA only requires analysis of BIG's direct and indirect effects, and does not require analysis of future, not reasonably foreseeable or speculative actions or activities, especially outside of the BIG footprint and in generalized locations, such as the 78-mile-long State Route 247. It is speculative to identify how vehicles and trucks would travel to and from the Project site and how the biological resources along those routes could be affected. The State CEQA Guidelines are clear that if a lead agency "finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact" (State CEQA Guidelines § 15145). In this case, the Draft EIR cannot speculate where vehicles and trucks would travel and the Draft EIR

is not required to describe baseline conditions and assess potential impacts of truck and vehicle activities at unidentified locations. The Draft EIR and Biological Resources Technical Report adequately address concerns about the impacts of Project related traffic at the Project site through project design features and mitigation measures that reduce potential impacts on desert tortoise and other special-status species to a less than significant level. **MM BIG BIO-4** restricts vehicle traffic associated with BIG construction to established roads, construction areas, and other permissible areas. If any vehicle must drive off established routes (e.g., within suitable habitat for special-status species), a qualified biological monitor shall walk and survey the vehicle path and 15-foot buffer on each side to ensure the species is absent from the area prior to use. In addition, **MM BIG BIO-4** includes measures to avoid impacts on special-status species from vehicle use, including (but not limited to): 1) limiting speeds to 25 miles per hour or as designated by a qualified designated biologist in areas of concern; 2) stopping for wildlife present on roads; 3) checking under vehicles and equipment prior to operation; and 4) communicating all vehicle measures to all personnel associated with BIG. Additionally, construction traffic shall be limited to approved haul routes established by the City Community Development Department, to the extent feasible. Figure 2-1 of the Specific Plan shows vehicle entrances and public and private roadways associated with BIG.

Further, the Biological Resources Technical Report addresses the potential for wildlife collisions and impacts on wildlife movement. The report highlights select areas within BIG where wildlife can move freely throughout (i.e., Lenwood Channel allows wildlife to move between south of BIG and the Mojave River). A span bridge is anticipated to be built over Lenwood Channel to support railway operations, which would leave the corridor for wildlife underneath unobstructed. Culverts and crossings along the existing railway provide corridors to access the Mojave River without wildlife entering the right-of-way. The proposed transload warehouse center is mapped as a wildlife corridor/linkage (CEHC 2017), and wildlife can continue to use this area to travel between areas of habitat along the Mojave River. Based on these analyses combined with **MM BIG BIO-32** which requires a new wildlife safe undercrossing of National Trails Highway, the Draft EIR appropriately concludes that vehicle-related impacts, including wildlife mortality on roadways, would be reduced to less than significant. Accordingly, the Draft EIR does not need to be revised to disclose and analyze impacts or identify mitigation for vehicle traffic outside the BIG footprint, and no recirculation is required. See also **Consolidated Response 03** concerning recirculation of the Draft EIR.

O24-28 This is a general comment that includes introductory remarks and a summary of CEQA provisions and case law, and serves to introduce more specific comments which are responded to in detail below. As a result, no specific response is provided here. See **Response O24-31** through **O24-55.**

O24-29 This is a general comment that includes a summary of CEQA provisions and case law, and no response is required. This comment also refers to an "IS/MND", presumably an Initial Study / Mitigated Negative Declaration that the commenter claims does not meet the requirements. This does not appear to be a comment about the Project, as a Draft EIR was prepared to analyze the Project's environmental impacts. No response is required.

O24-30 This is a general comment that includes introductory remarks and a summary of CEQA provisions and case law, and serves to introduce more specific comments which are responded to in detail below. As a result, no specific response is provided here. See **Response O24-31** through **O24-55.**

O24-31 This comment provides general information on the Mojave Fringe-Toed Lizard. It does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The comment is acknowledged for the record and would be forwarded to the decision-making bodies as part of this Final EIR for their consideration in reviewing the Project and EIR.

O24-32 An analysis of Mojave fringe-toed lizard is provided in the **Draft EIR Appendix 5.4 BIG-1 Section 5.0: Environmental Setting Figure 4.6-7: Mojave Fringe-Toed Lizard Survey Results**. Mojave fringe-toed lizard was observed throughout the dune habitat within the transload warehouse portion of the project site, concentrated within the central and northeastern portions. The Biological Resources Technical Report also documents the 1,587.9 acres of suitable habitat for Mojave fringe-toed lizard occurring with the BIG site, and discusses the condition and acreages of high, moderate, and low-quality habitat for the species. The Biological Resources Technical Report also states that the population on the project site represents the westernmost extent of the current known range of the species. Although the Biological Resources Technical Report does not include a quantitative population estimate for Mojave fringe-toed lizard within the project site, it can be concluded that the site is occupied by the species based on documented observations and the presence of suitable habitat. **Draft EIR Appendix 5.4 BIG-1 Section Figure 4.6-7** provides an approximate distribution of individuals of Mojave fringe-toed lizard observed during focused surveys on the project site.

Draft EIR Appendix 5.4 BIG-1 Section 6.0: Impact Analysis discusses potentially significant direct and indirect impacts on the species during BIG construction and operations. This includes a discussion of the potential impacts related to the loss of suitable habitat and injury and mortality due to vegetation clearing and grading. Indirect impacts related to dust and habitat fragmentation resulting from construction are also disclosed. See also **Responses S8-27** through **S8-37**.

O24-33 The Mojave River Buffer is shown on **Draft EIR Figure 3-5: BIG Components Overview** (page 3-11) and is located at the northern boundary of the project site along the Mojave River. As described in **Draft EIR Section 3.2.2**, approximately 680 acres at the northern boundary of the Specific Plan area would remain ungraded, with a portion of this area proposed to be placed under a conservation easement (Mojave River Buffer).

The Biological Resources Technical Report further describes the proposed conservation easement as “approximately 500 acres of Mojave River floodplain.” This description is consistent with the description of the Mojave River Buffer identified in **Draft EIR Section 3.2.2**. The approximately 500-acre conservation area is mentioned multiple times in **Draft EIR Appendix 5.4 BIG-1** (pages 131, 135, 136, 148, and 150) illustrating that the conservation area has been consistently disclosed and analyzed.

Habitat mapping for Mojave fringe-toed lizard is provided in **Draft EIR Appendix 5.4 BIG-1 Figure 5.1-7: Mojave Fringe-Toed Lizard Impacts**. Comparison of this figure with **Draft EIR Figure 3-5: BIG Components Overview** (page 3-11) indicates that the Mojave River Buffer consists primarily of dune habitat suitable for Mojave fringe-toed lizard and includes documented occurrences of the species. Approximately 500 acres of the Mojave River Buffer would be placed under a conservation easement and although the exact boundaries are to be determined, the conservation area is expected to be dominated by dune habitat occupied by Mojave fringe-toed lizard and/or connected to areas occupied by Mojave fringe-toed lizard, as required for mitigation lands (**MM BIG BIO-24**). Further review of the exact extent of this area and its adequacy as mitigation for Mojave fringe-toed lizard would occur in coordination with CDFW as required by **MM BIG BIO-24** and the mitigation measure lists very specific habitat criteria that must be met as well as additional mitigation land requirements beyond this easement to reach the required ratio.

Draft EIR Appendix 5.4 BIG-1 Section 6.0: Impact Analysis further explains the preservation of approximately 500 acres of undisturbed habitat within the Mojave River Buffer under a conservation easement would support continued wildlife movement and connectivity to larger blocks of suitable habitat to the north, northeast, and southwest.

To clarify the details of the conservation easement, the Draft EIR (page 3-8, last paragraph; page 5.4-88, second to last paragraph; page 5.4-90, second paragraph; and page 5.4-97, third paragraph) would be revised as follows and as shown in **Final EIR Section 3.0: Errata to the Draft EIR:**

Page 3-8, last paragraph

> BNSF Railway Company (BNSF) proposes the new BIG facility and its Specific Plan to be located partly in incorporated Barstow and partly in an existing unincorporated portion of the County, which the proposed General Plan proposes for concurrent annexation to the City. The BIG Specific Plan proposes a rail yard (see **Section 3.7.5**) consisting of an intermodal facility, a "block swap" yard and ancillary rail area, as well as a transload warehouse center (see **Section 3.7.6**), and a private utility (i.e., solar farm), and an approximately 680-acre area at the northern boundary of the Specific Plan area that would remain ungraded (referred herein as the "Mojave River buffer"), a portion of which, approximately 545.75 acres, is proposed to be placed under a conservation easement. Additionally, to serve the proposed rail yard and transload warehouse center, BNSF proposes off-site rail improvements (i.e., lead track extensions) and off-site non-rail improvements (i.e., stormwater drainage, utilities, and circulation/ roadways). "Off-site improvements" See improvements outside the BIG Specific Plan area, located in the City and County. On-site and offsite improvements are described further in **Sections 3.7.7**, **3.7.8**, and **3.7.10**.

Page 5.4-88, second to last paragraph

Indirect impacts to Mojave fringe-toed lizard from dune habitat destruction or degradation could occur. Increased noise, vibration, and dust generated by construction equipment could cause previously suitable habitat to become unsuitable. However, suitable habitat for Mojave fringe-toed lizard exists in the areas surrounding the BIG footprint. ~~Specifically, BIG would place an area comprising approximately 500 feet on either side of the Mojave River within the BIG footprint under a conservation easement.~~ A conservation easement would be established within the Mojave River buffer, comprising 545.75 acres on 13 lots. See **Figure 3-5** for a depiction of the Mojave River buffer. This conserved area would provide suitable, adjacent Mojave fringe-toed lizard habitat that individuals potentially disturbed by construction activity could access. However, indirect impacts would remain potentially significant and would require mitigation.

Page 5.4-90, second paragraph

American Beaver. One American beaver was incidentally observed swimming upstream in the Mojave River near the BIG footprint. No other American beaver sign, including tracks, cut vegetation, lodges, or dams, were observed. The species is not anticipated to dwell within the section of the Mojave River immediately adjacent to BIG since the river does not contain permanent water throughout the year. ~~Further, BIG would place an area comprising approximately 500 feet on either side of the Mojave River within the BIG footprint under a conservation easement.~~ A conservation easement would be established within the Mojave River buffer, comprising 545.75 acres on 13 lots. See **Figure 3-5** for a depiction of the Mojave River buffer. This conserved area would provide a buffer between where American beaver would be expected to occur (i.e., within the Mojave River) and BIG construction activities. However, should an individual be present during BIG construction activities, BIG construction could result in direct impacts to American beaver through harassment, injury, and/or death. Increased noise, vibration, and dust generated by construction equipment could also result in indirect impacts related to habitat disturbance. Indirect impacts would be potentially significant and would require mitigation.

Page 5.4-97, third paragraph

BIG includes the preservation of approximately ~~500 feet on either side of the Mojave River under a conservation easement.~~ 545.75 acres on 13 lots within the Mojave River buffer. **Figure 3-5** depicts the Mojave River buffer. This area contains dune habitat and the preservation of the area would lessen BIG's potential impacts to sensitive habitat. However, impacts would remain potentially significant and require mitigation.

The supplemental information provided clarifies and expands upon analyses included in the Draft EIR, and the conclusions of the Draft EIR remain valid. Also see **Consolidated Response 03** concerning recirculation of the Draft EIR.

O24-34 See **Response O24-33** for a description of the on-site conservation easement including its general location, approximate acreage, habitat suitability for Mojave fringe-toed lizard, and documented occupancy by the species. This comment appears to assume that only the 545-acre on-site conservation area is proposed to address compensatory mitigation requirements for Mojave fringe-toed lizard as described in **MM BIG BIO-24**. However, as described in the Draft EIR, **MM BIG BIO-24** requires that a minimum 1:1 ratio for 1,009 acres of impacts would be required for Mojave fringe-toed lizard compensatory mitigation to offset impacts on suitable habitat. **MM BIG BIO-24** would be revised as discussed in **Response S8-37**. Final compensatory mitigation requirements, mitigation ratio, and combination of on-site and off-site mitigation lands would be determined in coordination with CDFW as described in revised **MM BIG BIO-24**, as shown under **Response S8-37**.

As discussed in **Response S8-35** a greater mitigation ratio may be warranted for species listed under federal or state endangered species acts; however, the Mojave fringe-toed lizard is a Species of Special Concern that receives consideration under CEQA but has no formal legal status. Thus, mitigation requirements are not as substantial as for a state or federally listed species. The Draft EIR prescribes a mitigation ratio via **MM BIG BIO-24** that is commensurate with CEQA precedent for a California species of special concern that may experience a local population level impact. Compensatory mitigation ratios typically do not exceed a 1:1 ratio for species that are not formally protected under the provisions of the federal or state endangered species acts.[130] Nonetheless, to address concerns raised by CDFW's comments regarding sensitivity of the species and its habitat, **MM BIG BIO-24** would be revised from a minimum 1:1 ratio to a 2:1 ratio. Despite the varying qualities of impacted habitat for the state Species of Special Concern, mitigation acreage would equate to the protection of over 2,000 acres of suitable dune habitats for Mojave fringe-toed lizard. See **Response S8-37** for the updated text of **MM BIG BIO-24** that would incorporated into the EIR Furthermore**, Draft EIR Appendix 5.4 BIG-1 Section 6.0: Impact Analysis**, discusses impacts on the species' habitat and survivorship and how the implementation of the proposed mitigation measures would result in a less than significant impact. See also **Responses S8-36 and S8-37**.

O24-35 Other measures to mitigate for Mojave fringe-toed lizard beyond habitat preservation are included in the Biological Resources Technical Report to address impacts on the species; see **Draft EIR Appendix 5.4 BIG-1 Section 6.0: Impact Analysis**. These measures include but are not limited to: presence of a Species-Specific Biological Monitor during construction to prevent injury or mortality of individuals (**MM BIG BIO-23**); implementation of a WEAP training (**MM BIG BIO-1**) demarcation of work limits (**MM BIG BIO-7**); restrictions on vehicle and equipment operation (**MM BIG BIO-4**); and measures to avoid wildlife entrapment (**MM BIG BIO-9**).

Although the Draft EIR does not include a population estimate for Mojave fringe-toed lizard on the project site, sufficient baseline information is provided in **Draft EIR Appendix 5.4 BIG-1 Section 5.0: Environmental Setting** that documents the occupation of the species on site, the

[130] *Save Panoche Valley v. San Benito County* (2013) 217 Cal.App.4th 503, 528 ["`[M]itigation need not account for every square foot of impacted habitat to be adequate. What matters is that the unmitigated impact is no longer significant'"].

approximate density of occurrences, and the extent of suitable habitat. This information was collected during focused surveys and field vegetation mapping.

As discussed in **Response O24-33** above, the proposed on-site conservation easement adjacent to impacted dune habitat would facilitate the movement of Mojave fringe-toed lizard from the project site into larger blocks of connected habitat. **MM BIG BIO-23** further requires that Species-Specific biological monitors be present during the removal/disturbance of Mojave fringe-toed lizard habitat to facilitate natural dispersal into adjacent areas and/or relocation by a Species-Specific biological monitor.

Impacts on occupied habitat Mojave fringe-toed lizard habitat are disclosed in **Draft EIR Appendix 5.4 BIG-1 Section 6.0: Impact Analysis,** including a discussion of compensatory mitigation requirements to offset the impacts to habitat. **MM BIG BIO-24** requires that mitigation lands be protected through implementation of a Long-term Management Plan (LTMP) and funded endowment to ensure preservation and management of target species habitats in perpetuity. An LTMP would help ensure conserved land remains suitable and of high quality for Mojave fringe-toed lizards. These requirements apply to the on-site Conservation Easement area as well as off-site mitigation lands. Additionally, the LTMP requires review and approval by CDFW to confirm habitat goals and performance standards are met and reported upon each year with requirements for adaptive management as necessary. See also **Response S8-37**.

O24-36 Indirect impacts on Mojave fringe-toed lizard are evaluated in **Draft EIR Appendix 5.4 BIG-1 Section 6.0: Impact Analysis**. This section discloses potential impacts resulting from raven predation: "increased human presence could result in increased raven populations and, therefore, increased predation of Mojave fringe-toed lizard and juveniles in nearby habitat, if present." To address this potential indirect impact, **MM BIG BIO-15** requires implementation of a Raven Management Plan. The plan would include measures to manage and reduce potential raven subsidies on site, as well as measures to avoid attracting ravens to perch and nest sites. In addition, **MM BIG BIO-15** requires participation in the interagency Raven Monitoring and Management Program, as detailed in the measure. The Raven Management Plan would be implemented during construction of the project site, and the interagency contribution contributes to long-term management needs.

Regarding the comment on sand movement, the Mojave River – Barstow/Camp Cody Linkage is a critical linkage spanning 79-miles and has an important role in the transport of sand to the Kelso Dunes. As shown on **Draft EIR Appendix 5.4 BIG-1 Figure 3.5-1: Wildlife Corridors and the CEHC Project** the project site partially overlaps with a portion of the Mojave River – Barstow/Camp Cody Linkage. However, the project site overlaps with a portion of the linkage as mapped at a coarse scale along a less than five-mile segment. The actual extent of the linkage that supports sand transport is dynamic and varies based on climatic conditions from year to year. BIG would not cut-off or block the linkage/corridor, as the BIG footprint is situated southeast of the Mojave River, avoiding the actual river corridor entirely.

As described in the **Draft EIR Section 5.4: Biological Resources** and the Biological Resources Technical Report, approximately 500 acres of dune habitat within the project site (adjacent to the Mojave River corridor) would be preserved under a conservation easement. The conservation easement would preclude future development activities from occurring in these areas and contribute to protection of dune habitat. Preservation of this habitat would support the continued movement of sand within and around the Mojave River-Barstow/Camp Cody Linkage in perpetuity.

O24-37 **Draft EIR Appendix 5.4 BIG-1 Section 5.0: Environmental Setting** acknowledges the potential unique ecological and genetic importance of the Mojave fringe-toed lizard subpopulation occurring within the project site. The potential impacts on the unique subpopulation are discussed in **Draft EIR Appendix 5.4 BIG-1 Section 6.0: Impact Analysis**: "Mortality of this peripheral population could result in decrease in genetic variation across the species, making them less adaptable to changing environmental conditions, including but limited to, affects resulting from climate change."

However, potentially significant impacts from harm/injury/mortality would be avoided through the implementation of **MM BIG BIO-23**, which requires the presence of a Species-Specific biological monitoring during habitat disturbance/removal. Through this mitigation measure, biological monitors would facilitate the safe dispersal and/or relocation of individuals away from active construction areas. Dispersal or relocation would likely occur into the adjacent 500-acre area proposed for conservation. This area is connected to large blocks of natural habitat to the north, northeast, and southwest of the project site. This would allow for the persistence of the sensitive subpopulation of Mojave fringe-toed lizard occurring within/around the project site. Additionally, see **Response S8-30** clarifying that the location of the site is in the center of the western portion of the species range; and among the two species lineages identified by genetic research (Murphy et al. 2006), the Mojave River Basin lies within the southern genetic lineage of Mojave fringe-toed lizards. This lineage extends south over 150 miles to the Colorado River system and Murphy et al. 2006 concludes that the southern populations (which include BIG) exhibit little local genetic differentiation.

Draft EIR Section 5.4 (pages 5.4-89 and 5.4-90) **MM BIG BIO-24** is revised in the Final EIR, as shown above in **Response S8-37**.

With implementation of avoidance, minimization, and mitigation measures, including **MM BIG BIO-23** and the revised **MM BIG BIO-24**, impacts on the Mojave fringe-toed lizard subpopulation would be less than significant.

O24-38 This comment accurately states the federal and state conservation status for the Mojave desert tortoise. It also states that impacts to the Mojave desert tortoise must be fully evaluated and disclosed under CEQA. This comment does not address any project-specific concerns and is consistent with the regulatory context that applies to desert tortoise as included in the Draft EIR and Biological Resources Technical Report. As a result, no specific response is provided here.

O24-39 This comment highlights the threats to Mojave desert tortoise that play a part in its conservation status and notes potential threats to the Mojave desert tortoise for this project. As a result, no specific response is provided here. Project-specific concerns are addressed in responses to subsequent **Response O24-40** through **O24-46**.

O24-40 This comment addresses the increase in raven populations resulting in juvenile desert tortoise predation. The Draft EIR and **Draft EIR Appendix 5.4-1 Section 6.0: Impact Analysis** evaluate BIG's potential impacts associated with ravens and human presence and development. In order to reduce potential impacts, predation would be prevented and/or minimized through the implementation of Raven Management Plan as described in **MM BIG BIO-15**, which includes raven subsidy prevention, raven surveys, and participation in the interagency Raven Monitoring and Management Program to address indirect impacts on desert tortoise "related to the potential increase in the raven population" as a result of BIG construction and operations.

O24-41 This comment addresses habitat destruction of desert tortoise and notes energy development projects as part of their habitat loss. This comment does not raise any concerns specific to BIG's biological resources analysis. As a result, no specific response is provided here.

O24-42 This comment highlights vehicle collisions as a cause for desert tortoise mortality and traffic as a cause for reduced connectivity. This comment does not raise any concerns specific to BIG's biological resources analysis. As a result, no specific response is provided here.

O24-43 This comment states that the Draft EIR fails to provide a reliable baseline to assess BIG's impacts on the Mojave desert tortoise because: 1) estimates of desert tortoise within the project site were based on scattered surveys due to timing constraints; and 2) some surveys occurred outside of the recommended seasonal survey window. As noted in **Consolidated Response 13** concerning speculation without substantial evidence and requests for additional analysis and study, commenters are advised to support assertions that the lead agency should conduct additional analysis or review with data or other factual references. This is because the lead agency's CEQA conclusion must be based on substantial evidence in the record and not speculation. Here, the commenter has not pointed to any facts or data that support its contention that the Draft EIR's analysis is flawed. Nonetheless, in addressing commenter's concerns, the Biological Resources Technical Report states that estimates of abundance were solely based on survey results from September to October 2024, which covered the entire project area with the exception of the solar farm that was surveyed in May of 2024. Thus, 100 percent coverage of the site was achieved within the seasonal protocol survey windows and estimates of abundance were based on surveys conducted during these timeframes as well. Additionally, consultation with CDFW and USFWS resulted in agreement that surveys and data collected outside of the standard protocol timing would be considered valid and has been utilized as supplemental information but not for population estimates. Accordingly, the surveys relied in the Draft EIR are not inadequate.

O24-44 This comment states the Draft EIR fails to clearly disclose that juvenile desert tortoises were not accounted for in abundance calculations. As noted in **Consolidated Response 13** concerning speculation without substantial evidence and requests for additional analysis and study, commenters are advised to support assertions that the lead agency should conduct additional analysis or review with data or other factual references. This is because the lead agency's CEQA conclusion must be based on substantial evidence in the record and not speculation. Here, the commenter has not pointed to any facts or data that support its contention that the Draft EIR's analysis is flawed. Nonetheless, in addressing commenter's concerns, **Draft EIR Appendix 5.4 BIG-1**, clearly states: "Juvenile desert tortoise, which includes tortoises with a carapace length less than 180 millimeters, if observed, are not factored into this calculation due to the lower probability of detection." As the comment accurately mentions, excluding juvenile desert tortoises from abundance calculations is consistent with USFWS distance-sampling protocol. The USFWS methodology clearly states that juveniles are not included in abundance due to a lower detectability. Excluding juvenile desert tortoises does not alter the accuracy of the baseline calculation as the baseline only accounts for subadult and adult desert tortoise to be consistent with USFWS methodology. Surveys conducted for desert tortoise included documentation of juveniles, which is disclosed in the Biological Resources Technical Report, contributed to the baseline survey documentation, and was factored into the impact analysis as discussed in **Draft EIR Appendix 5.4-1 Section 6.0: Impact Analysis**. Accordingly, the Draft EIR reflects an accurate baseline based on reliable data based on USFWS methodology.

O25-45 This comment argues that BIG does not provide adequate mitigation based on the statement that the mitigation measures "fail to grapple with permanent habitat loss, habitat fragmentation, translocation mortalities, increased traffic collision risks, and ongoing predator subsidies." As noted in **Consolidated Response 13** concerning speculation without substantial evidence and requests for additional analysis and study, commenters are advised to support assertions that the lead agency should conduct additional analysis or review with data or other factual references. This is because the lead agency's CEQA conclusion must be based on substantial evidence in the record and not speculation. Here, the commenter has not pointed to any facts or data that support its contention that the Draft EIR's analysis is flawed. Nonetheless, in addressing commenter's concerns, it should be noted that proposed compensatory mitigation for BIG accounts for the permanent loss of suitable high, moderate, and low quality habitat for Mojave desert tortoise. As required by **MM BIG BIO-16** a minimum 1:1 ratio of compensatory mitigation habitat would be preserved to offset BIG's impacts to desert tortoise habitat. Habitat fragmentation and wildlife connectivity is addressed in **Response O-24-15** through **O24-23** and **Response O24-32**. Translocation mortalities are addressed in **Response O24-46** and would be avoided through the Desert Tortoise Translocation Plan as required by **MM BIG BIO-14**. Traffic collision risks are addressed in **Responses O24-24** and **Response O-24-27**. Predator subsidies are addressed in the Biological Resources Technical Report and **MM BIG BIO-15,** and would be mitigated by the Raven Management Plan. With the implementation of the above mitigation measures, as well as numerous construction best practices required by **MM BIG BIO-1** through **MM BIG BIO-12**, clearance surveys and fencing per **MM BIG BIO-13**, and compensatory preservation, impacts

to the Mojave Desert tortoise would be less than significant. Accordingly, the Draft EIR properly disclosed and mitigated for Project impacts.

O24-46 This comment states that mortality risks to desert tortoise translocation are undisclosed. The Desert Tortoise Translocation Plan would be prepared based on the Translocation of Mojave Desert Tortoises from Project Sites: Plan Development Guidance (USFWS 2020), Health Assessment Procedures for the Mojave Desert Tortoise (*Gopherus agassizii*): A Handbook Pertinent to Translocation (USFWS 2016), and Desert Tortoise (Mojave Population) Field Manual (*Gopherus agassizii*) (USFWS 2009) as required by **MM BIG BIO-14**. Mortality risks and avoidance measures would be included in the Desert Tortoise Translocation Plan, and the plan would be approved by USFWS and CDFW prior to implementation. Only highly qualified and agency-approved biologists would be allowed to carry out the translocation as required by the protocols cited in the mitigation measure.

Additionally, the comment notes the Raven Management Plan "may include" measures to be implemented during construction and how this lacks enforceable performance standards and gives the implementing agency full discretion of the plan development. **MM BIG BIO-14** is sufficiently detailed and specific to allow meaningful review, lead agency conclusions per significance criteria, and enforceability. The Raven Management Plan would include measures to prevent ravens from establishing a nest, roost, or perch site, as well as raven surveys and participation in the interagency Raven Monitoring and Management Program. The measure requires coordination with the USFWS, CDFW, and City and therefore is not at the sole discretion of the implementing entity. A mitigation measure that requires permitting and coordination with the agencies with expertise on these issues provides sufficient performance standards to be enforceable under CEQA.[131,132] The mitigation measures included in the Raven Management Plan would also address how raven mitigation techniques would remain effective throughout project construction. Accordingly, **MM BIG BIO-14** meets the standards under CEQA. Also see **Consolidated Response 05-07** regarding use of performance standards and deferred mitigation.

O24-47 This comment states that Bendire's thrasher and LeConte's thrasher were not adequately evaluated in the Draft EIR. As noted in **Consolidated Response 13** concerning speculation without substantial evidence and requests for additional analysis and study, commenters are advised to support assertions that the lead agency should conduct additional analysis or review with data or other factual references. This is because the lead agency's CEQA conclusion must be based on substantial evidence in the record and not speculation. Here, the commenter has not pointed to any facts or data that support its contention that the Draft EIR's analysis is flawed. Nonetheless, in addressing commenter's concerns, it should be noted that both species are addressed in the Biological Resources Technical Report (**Draft EIR Appendix 5.4 BIG-1**).

[131] *Clover Valley Foundation v. City of Rocklin* (2011) 197 Cal.App.4th 200, 237 [requirement that permits be obtained from CDFW served as performance standards supporting agency's determination that impact to listed species and its habitat would be mitigated].

[132] *Defend the Bay v. City of Irvine* (2004) 119 Cal.App.4th 1261, 1276 [requirement to consult with the USFWS and CDFW not improper deferred mitigation].

Bendire's thrasher was not observed during biological surveys at BIG and is not generally known to occur in the immediate vicinity of the project site. Additionally, BIG lacks potential nesting habitat for this species as discussed in the Biological Resources Technical Report. LeConte's thrasher was observed during biological surveys on site as documented in the Biological Resources Technical Report at two distinct locations. Nesting was not observed although the species was identified as having potential to nest on site. Accordingly, BIG's direct and indirect impacts on the species from construction and operations/maintenance have been evaluated and are discussed in **Draft EIR Appendix 5.4 BIG-1 Section 6.0: Impact Analysis**. Although Bendire's thrasher was not documented on site and is not anticipated to occur due to a lack of preferred habitat and very few records in the vicinity of BIG, the potential impacts that may occur on the species would be similar to those for LeConte's thrasher. These impacts primarily relate to habitat disturbance and potential effects on nesting activity. With implementation of **MM BIG BIO-18** as described in **Draft EIR Appendix 5.4 BIG-1 Section 7.0: Cumulative Impacts on Biological** Resources, which include avoidance measures and nesting bird protections, impacts on these species and nesting birds in general would be less than significant. Although this comment discusses the population declines for these two species; they were not listed or candidates for listing under the federal or state endangered species acts at the time of Draft EIR circulation. Subsequently, LeConte's thrasher has been designated as a candidate species under CESA and receives additional protections accordingly. This regulatory change and relevance to the species at BIG is discussed in more detail in **Final EIR Appendix 3-2: LeConte's Thrasher and Bendire's Thrasher Regulatory Status Change Errata**. As an added measure of protection for potential nest sites, **BIG MM BIO-17** has been revised to incorporate LeConte's thrasher. The measure requires additional pre-construction survey requirements and restrictive construction noise mitigation and monitoring for potentially nesting listed and candidate avian species to ensure take avoidance.

MM BIG BIO-17 (Draft EIR pages 5.4-182 and 5.4-183) is revised in the **Final EIR Section 3.0: Errata to the Draft EIR**, as follows:

MM BIG BIO-17: Southwestern Willow Flycatcher, ~~and~~ Western Yellow-billed Cuckoo, and LeConte's Thrasher Construction Requirements. Construction activities within suitable southwestern willow flycatcher**,** western yellow-billed cuckoo**,** and LeConte's thrasher nesting habitat should occur outside of the breeding season (generally May 1 through August 31 for southwestern willow flycatcher and western yellow-billed cuckoo and late January to early June for LeConte's thrasher) when feasible. If construction activities must occur within the breeding season, any nesting habitat shall be removed prior to the breeding season.

If construction activities must occur within 500 feet of suitable ~~riparian~~nesting habitat (i.e., near the Mojave River) and within the nesting season for southwestern willow flycatcher, ~~and~~ western yellow-billed cuckoo, and LeConte's thrasher, pre-construction surveys shall be conducted prior to construction activities that occur within 500 feet of suitable habitat. Results shall be provided to the City. A Species-Specific BM shall conduct

pre-construction surveys for southwestern willow flycatcher, ~~and~~ western yellow-billed cuckoo, and LeConte's thrasher within 30 days prior to start of construction activities that occur within 500 feet of suitable habitat. The Species-Specific BM shall hold a USFWS recovery permit and be authorized by the agency to conduct pre-construction southwestern willow flycatcher surveys and/or western yellow-billed cuckoo surveys. The Species-Specific BM shall also conduct the pre-construction LeConte's thrasher survey in general accordance with the guidelines provided by the Desert Thrasher Working Group (2018, 2024) or other acceptable survey methodology that allows for thorough detection of nests (if any).

If southwestern willow flycatcher, ~~or~~western yellow-billed cuckoo, or LeConte's thrasher is documented nesting within the BIG footprint during pre-construction surveys, no work shall occur within a 500-foot buffer of the nest and consultation with USFWS and CDFW shall occur (as applicable to the species under their jurisdiction), and additional measures may be implemented to avoid take. Federal and state incidental take permits may be required for proposed actions that are determined to have adverse effects on southwestern willow flycatcher, ~~or~~ western yellow-billed cuckoo, and/or LeConte's thrasher.

If southwestern willow flycatcher, ~~or~~ western yellow-billed cuckoo, and/or LeConte's thrasher nesting behavior and/or breeding territories are documented within 500 feet of construction activities during pre-construction surveys and construction activities must proceed during the nesting season, no work shall occur within a 500-foot buffer of the nest and construction noise shall be monitored and minimized per a Wildlife Noise Study and Monitoring Plan to be implemented with DB oversight. Prior to and during construction, noise monitoring shall be conducted within suitable ~~riparian~~nesting habitat contiguous with occupied territories at the vegetation limit closest to impact area. Noise limits are only applicable to the occupied nest habitat and suitable contiguous ~~riparian~~nesting vegetation determined to be part of the nesting territory. Noise monitoring shall be conducted by a qualified noise specialist on coordination with a Species-Specific BM. While conducting noise monitoring, the BM shall monitor the active nests to allow normal breeding behaviors to not be indirectly impacted by noise from construction activities.

Construction noise levels shall not exceed pre-construction ambient levels or a 70 dBA hourly average, whichever is greater, in habitat occupied by nesting southwestern willow flycatcher, ~~and~~ western yellow-billed cuckoo, and LeConte's thrasher unless authorized by the appropriate regulatory authorities (i.e., CDFW and/or USFWS). Construction activities that exceeded noise limits in the nest territory would be adjusted to reduce noise to below pre-construction ambient levels, a 70dBA hourly average, or the agency-approved threshold. Alternatively, noise attenuation measures shall be implemented to reduce noise within occupied southwestern willow flycatcher, ~~and/or~~ western yellow-billed cuckoo, and/or LeConte's thrasher breeding territories to below the limit. Measures may include installation of sound barriers or walls, phasing of equipment use, changes in scheduling, and temporary avoidance of certain portions of the impact area. Noise monitoring shall be conducted when attenuation measures are implemented to document a successful or

unsuccessful reduction in noise to below the established threshold. If such adjustments or measures are not feasible and noise levels are found to result in average hourly noise levels greater than 70 dBA or pre-construction ambient levels, whichever is greater, work would be postponed until after the breeding season or after the southwestern willow flycatcher, ~~and/or~~ western yellow-billed cuckoo, and/or LeConte's thrasher fledglings are no longer dependent on the affected breeding territory, as confirmed by a qualified biologist unless authorized by the appropriate regulatory authorities (i.e., CDFW and/or USFWS). A noise level verification report shall be submitted by the implementing entity to CDFW and/or USFWS every two weeks during work that required noise monitoring for listed or candidate species as described above.

O24-48 This comments states that Bendire's thrasher and LeConte's thrasher are difficult to survey for "and often overlooked." Rocks Biological conducted 59 different surveys within BIG and the surrounding vicinity between November 2018 and August 2025 across all seasons as outlined in **Draft EIR Appendix 5.4 BIG-1 Section 3.0: Laws, Regulations, and Orders Table 4**. Site visits resulted in the observation of 183 plant species and 145 wildlife species, of which 102 were avian species. Accordingly, the level of survey effort carried out for the biological resources analysis was in line with industry standards and sufficiently addressed under CEQA for a project of this size, type, and location. Additionally, Rocks Biological Consulting has conducted biological field work throughout San Bernardino County for over two decades with five consecutive years at BIG. Both field-level and principal biologists are highly qualified to detect plants and wildlife in the area possessing extensive knowledge of the local biological resources. In addition to field surveys and local knowledge, assessments also incorporated information from agency and citizen science databases to evaluate the potential for special-status species to occur. Rocks Biological Consulting observed LeConte's thrasher on site and has addressed potential impacts on the species as noted in **Response O24-47** above. An assessment of the potential for Bendire's thrasher to be present on site is provided in **Draft EIR Appendix 5.4 BIG-1 Section 6.0: Impact Analysis Table 11.**

O24-49 As explained in **Response O24-48** above, the background review and level of survey effort carried out at BIG is in line with standard industry practice, regulatory agency accepted protocols, and precedent for CEQA review, and provides adequate information for the public and agencies to consider potentially significant project consequences. As noted in **Consolidated Response 13** concerning requests for additional analysis and substantial evidence, commenters are advised to support assertions that the lead agency should conduct additional analysis or review with data or other factual references. This is because the lead agency's CEQA conclusion must be based on substantial evidence in the record and not speculation. Here, the comment does not present any new evidence that either species has a potential to occur in the study area at a rate greater than what was analyzed in the Draft EIR. Therefore, the comment's assertion that Bendire's thrasher may be present on the project site is speculative and any further surveys would not be consistent with CEQA because such impacts are speculative given the lack of any evidence that such species are present or have ever occurred within the project site (State CEQA Guidelines §15064).

O24-50 At the time of Draft EIR circulation, LeConte's thrasher was a CDFW Species of Special Concern and USFWS Bird of Conservation Concern, not protected under CESA or FESA. Accordingly, the protections outlined in **MM BIG BIO-18** were adequate to address direct, indirect and cumulative impacts to the species, and consistent with requirements under CEQA. Subsequently, LeConte's thrasher has been designated as a candidate for listing under CESA. In line with this increased level of protection, MM BIG BIO-17 has been revised as detailed in Response 024-47 to ensure complete avoidance of take and consultation with CDFW if take would reasonably occur as a result of BIG.

O24-51 As discussed in **Response O24-50**, at the time of submittal, LeConte's thrasher and Bendire's thrasher were neither listed nor candidate species under FESA or CESA. As stated previously, Le Conte's and Bendire's thrasher have recently been designated as candidate species under CESA. As discussed in Response 024-47, Bendire's thrasher is not expected to occur on the BIG site. In line with CEQA precedent, **MM BIG BIO-18** outlines appropriate mitigation and avoidance measures for special-status nesting bird species, which are legally protected under the MBTA and CFGC as individuals and at active nest sites. **MM BIG BIO-18** also protects the LeConte's thrasher from impacts and nest disturbance. Per **MM BIG BIO-18** requirements, a qualified biological monitor will establish a suitable non-disturbance buffer around any active nests identified during the required nesting bird survey based on the level of construction activity within the vicinity and sensitivity of the species observed. Accordingly, the elevated sensitivity status would be considered in determining the buffer necessary and follow on monitoring is required to ensure there is no impact on LeConte's thrasher or their nests. Additionally, revisions to **MM BIG BIO-17** have been made per **Response 024-47** to incorporate LeConte's thrasher into this mitigation measure. The measure requires additional species-specific pre-construction survey requirements and more restrictive construction noise mitigation and monitoring for listed and candidate avian species to ensure full take avoidance as now required under CESA for LeConte's thrasher. In line with CEQA precedent, **MM BIG BIO-18** outlined appropriate mitigation and avoidance measures for both thrasher species based on their status at the time of Draft EIR circulation. As these species became elevated in listing status, measures outlined in the Draft EIR would still be adhered to with the additional requirements of **MM BIG BIO-17** incorporated, and if they are observed nesting within the BIG footprint during pre-construction or other site surveys/monitoring, the qualified biologist would install avoidance buffers and noise attenuation appropriate to the species' listing status and additional agency consultation would be conducted.

O24-52 This comment states that approximately 15,000 acres of protected habitat would be needed to offset project impacts on LeConte's and Bendire's thrashers. However, this statement assumes that all approximately 5,000 acres of the BIG footprint provide equally suitable habitat for these species. Compensatory mitigation is to be obtained to offset direct impacts on suitable western burrowing owl and desert tortoise habitat and would be of equal or greater value than the impacted habitat. Compensatory mitigation is being pursued through land acquisition, conservation, and long-term management of in-kind habitat. Given the mitigation ratios required by **MM BIG BIO-16, MM BIG BIO-22,** and **MM BIG BIO-24**. BIG

would be required to preserve over 500 acres on site and acquire off-site compensatory mitigation that would exceed 5,000 acres of creosote bush scrub, active desert dunes, and stabilized and partially stabilized desert dunes habitat. Although this land acquisition is being pursued for burrowing owl, Mojave fringe-toed lizard, and desert tortoise mitigation, it provides both suitable foraging and potential nesting habitat for other species, including thrashers, for which compensatory mitigation was not explicitly required given their regulatory status at the time of Draft EIR circulation. Although LeConte's thrasher has been documented infrequently at BIG (see **Final EIR Appendix 3-2: LeConte's Thrasher and Bendire's Thrasher Regulatory Status Change Errata**), the habitats to be preserved in perpetuity as required by **MM BIG BIO-16, MM BIG BIO-22, MM BIG BIO-24** (see also **Response S8-37**), and **MM BIG BIO-28**, as well as conservation of the Mojave River buffer (see also **Response O24-33**) would also adequately mitigate potential LeConte's thrasher habitat impacts to a less than significant level under CEQA. Accordingly, no changes are required to the Draft EIR and no recirculation is required. See also **Consolidated Response 03** concerning recirculation of the Draft EIR.

O24-53 This comment states that the Draft EIR inadequately analyzes the impacts of construction and operational noise on special-status bird species known or likely to occur within or adjacent to the project site. As noted in **Consolidated Response 13** concerning requests for additional analysis and substantial evidence, commenters are advised to support assertions that the lead agency should conduct additional analysis or review with data or other factual references. This is because the lead agency's CEQA conclusion must be based on substantial evidence in the record and not speculation. Here, the commenter has not pointed to any facts or data that support its contention that the Draft EIR's analysis is flawed. Nonetheless, in addressing commenter's concerns, it should be noted that potential indirect construction and operational/maintenance impacts on avian species are addressed in the **Draft EIR Appendix BIG-1 Section 6.0: Impact Analysis**, for southwestern willow flycatcher, western yellow-billed cuckoo, Swainson's hawk and western burrowing owl and under Non-Listed Special-Status Wildlife Species for species that include the observed LeConte's thrasher. Additionally, see **Final EIR Appendix 3-2: LeConte's Thrasher and Bendire's Thrasher Regulatory Status Change Errata** for additional discussion on LeConte's thrasher and Bendire's Thrasher.

This comment states that the Draft EIR inadequately analyzes the impacts of construction and operational noise on special-status bird species know or likely to occur within or adjacent to the project site. However, direct and indirect construction and operational/maintenance impacts on avian species are addressed in **Draft EIR Appendix 5.4 BIG-1 Section 6.0: Impact Analysis** and **MM BIG BIO-17** addresses noise impacts on southwestern willow flycatcher, LeConte's thrasher, and yellow-billed cuckoo. Under this measure, if any of these species is observed nesting within 500 feet of construction activities, noise levels shall not exceed pre-construction ambient levels or a 70 dBA hourly average, whichever is greater, in habitat occupied by nesting southwestern willow flycatchers, LeConte's thrashers, or western yellow-billed cuckoos. This measure ensures that construction-related noise would not result in a significant impact on these species. **Draft EIR Appendix 5.4 BIG-1 Section 6.0: Impact Analysis**

evaluates Swainson's hawk based on the findings of focused Swainson's hawk surveys conducted for BIG in 2024 and 2025. A single pair of Swainson's hawks were observed nesting approximately one mile north of BIG adjacent to an active agricultural field at the intersection of Community Boulevard and Dixie Road. Although the BIG footprint supports suitable open foraging habitat, focused survey and foraging habitat analysis results indicate that Swainson's hawk is selectively foraging in agricultural fields north of BIG. No Swainson's hawks were observed foraging within the BIG footprint during focused surveys. **MM BIG BIO-20** requires pre-construction surveys for Swainson's hawk, but due to their lack of foraging on site and the distance of nesting and preferred foraging habitat from BIG, noise impacts on Swainson's hawk would be less than significant. As discussed in the **Draft EIR Appendix 5.4 BIG-1 Section 5.0: Environmental Setting** and **Section 6.0: Impact Analysis,** burrowing owls were observed within BIG during the non-breeding season between 2021 – 2025 both during focused surveys and incidentally. No live burrowing owls were observed during the breeding season within BIG and burrowing owl activity is limited to short-term overwintering within portions of the site by a relatively few transient individuals. Although operational noise levels may exceed pre-construction levels with increased human, vehicle, and equipment activities resulting from BIG operations, such noise is not expected to significantly affect any burrowing owl potentially overwintering in the areas surrounding BIG. Therefore, indirect noise impacts on western burrowing owls from operation and maintenance of BIG, if present, are not anticipated as discussed in the **Draft EIR Appendix 5.4 BIG-1 Section 6.0: Impact Analysis**.

O24-54 As mentioned in **Response O24-53** above, impacts from noise on special-status species are addressed in **Draft EIR Appendix 5.4 BIG-1 Section 6.0: Impact Analysis**. **MM BIG BIO-19** addresses construction-related noise impacts by ensuring that noise-generating equipment use is restricted to hours least likely to disrupt wildlife to the maximum extent practicable. The use of generators shall be restricted except for temporary use in emergencies. Power shall be provided via low noise-level sources (e.g., solar photovoltaic systems, cogeneration systems, small hydroelectric systems, or small wind turbine systems). Where generators must be used temporarily for an emergency, noise suppression devices such as mufflers or enclosures for generators shall be used as described in **MM BIG BIO-19**.

O24-55 Potential noise impacts on listed or candidate avian species within or in the vicinity of BIG have been evaluated in **Draft EIR Appendix 5.4 BIG-1 Section 6.0: Impact Analysis** and mitigation measures proposed in **Draft EIR Appendix 5.4 BIG-1 Section 8.0: Mitigation Measures** provide the best practices to reduce potential impacts on these species to less than significant. As mentioned in **Response O24-53**, **MM BIG BIO-17** requires implementation of noise attenuation measures and noise monitoring if southwestern willow flycatchers, Le Conte's thrashers, and/or western yellow-billed cuckoos are observed nesting within or near the project site during construction activities. Focused surveys indicated that Swainson's hawks do not use BIG for foraging or nesting and instead rely on agricultural fields approximately one mile north of BIG. Given the distance between the project site and known nesting and foraging areas, BIG's construction and operational noise are unlikely to result in significant impacts on Swainson's hawk. Finally, burrowing owls have been observed within the project site only during the non-breeding season, use of the site is limited to short-term

overwintering by a small number of individuals. Potential noise impacts are not expected to significantly affect overwintering individuals. Based on the evaluation in the Draft EIR, project-related noise would not result in significant impacts on listed or candidate avian species. Accordingly, no changes are required to the EIR.

O24-56 This is a general comment that includes concluding remarks and a summary of CEQA provisions and case law related to the administrative record. As a result, no specific response is provided here. The commenter has been added to the distribution list for the Project.

COMMENT LETTER O25

O25

Comments on SCH # 2024020501 City of Barstow General Plan and Barstow International Gateway Project Draft Environmental Impact Report

Kristeen Penrod <kristeen@scwildlands.org>

Mon 1/12/2026 5:03 PM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

1 attachments (226 KB)

BarstowGP_BIG_SCWildlands_Comments.pdf;

[NOTICE: THIS IS AN EXTERNAL EMAIL]
Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!.

Caution! This message was sent from outside your organization.

Thank you for the opportunity to comment on the DEIR. Please find attached SC Wildlands comments.

Kristeen Penrod, Director
SC Wildlands
Direct 626-497-6492
www.scwildlands.org

SC Wildlands

SC Wildlands
Science & Collaboration for Connected Wildlands
P.O. Box 1052, Fair Oaks, CA 95628
www.scwildlands.org

January 12, 2026

City of Barstow
220 East Mountain View Street, Suite A,
Barstow, CA 92311
Submitted via email generalplan@barstowca.org

Subject: Comments on SCH # 2024020501 City of Barstow General Plan and Barstow International Gateway Project Draft Environmental Impact Report

To Whom It May Concern:

Thank you for the opportunity to comment on the DEIR for the City of Barstow General Plan and Barstow International Gateway Project Draft Environmental Impact Report. SC Wildlands' mission is to protect and restore systems of connected wildlands that support native species and the ecosystems upon which they rely. As such, our comments on the DEIR largely focus on the potential impacts of the proposed actions on habitat connectivity and wildlife movement corridors. O25-1

The DEIR was a BIG disappointment. While the requirements of the *Room to Roam Act* (Assembly Bill 1889) won't officially kick in until January 1, 2028, any jurisdiction engaged in a General Plan update after the bill was signed into law should, based on best management practices and good faith, update their Conservation Element to:

> *(A) Identify and analyze connectivity areas, permeability, and natural landscape areas within the jurisdiction, as those terms are defined in Section 158 of the Streets and Highways Code.*
>
> *(B) Identify and analyze existing or planned wildlife passage features, as defined in Section 158 of the Streets and Highways Code, including, but not limited to, wildlife passage features included in the inventory of connectivity needs on the state highway system, as described in Section 158.1 of the Streets and Highways Code, to ensure that planned development does not undermine the effectiveness of existing and potential wildlife passage features, as defined in Section 158 of the Streets and Highways Code.*
>
> *(C) (i) Consider the impacts of development and the barriers caused by development to wildlife and habitat connectivity.* O25-2
>
> *(ii) For the purposes of this subparagraph, "wildlife" has the same meaning as defined in Section 89.5 of the Fish and Game Code.*
>
> *(D) Avoid, minimize, or mitigate impacts and barriers to wildlife movement to the extent feasible.*
>
> *(E) Analyze and consider opportunities to remediate existing barriers to wildlife connectivity and restore degraded habitat and open space.*
>
> *(5) If a city, county, or city and county has already included policies in existing plans, including its certified local coastal plan, that meet the requirements of paragraph (4), the city, county, or city and county may incorporate the plan by reference into the general plan to comply with this section.*
>
> *(6) In preparing to update the conservation element, the city, county, or city and county may do any of the following:*

SC WILDLANDS 1

(A) Consider incorporating appropriate standards, policies, and feasible implementation programs such as wildlife-friendly fencing and lighting, buffers from sensitive resources, prohibitions on invasive plants, habitat connectivity overlay zones, and compact development standards, or consider whether adoption of ordinances is necessary to feasibly implement these standards, policies, and implementation programs, and include goals to adopt any necessary ordinances.

(B) Consult with the Department of Fish and Wildlife, any California Native American tribe that is on the contact list maintained by the Native American Heritage Commission and that has traditional lands located within the city, county, or city and county's jurisdiction, and any open-space district that owns lands designated for conservation within the city, county, or city and county's jurisdiction. Upon receiving a request for consultation, the department, tribe, or district may, in its sole discretion, accept or refuse to consult, based on the priority of natural resources impacted or other factors.

(C) Consider relevant best available science as appropriate, including, but not limited to, peer-reviewed literature, citable publicly available datasets, publicly sourced online datasets, and information and reports from government agencies, California Native American tribes, and academic institutions.

(D) Consider the most appropriately scaled scientific information on linkages, corridors, and other locations that are essential to maintain landscape connectivity, including, but not limited to, any of the following:

(i) Habitat linkages and wildlife corridors, such as those identified and summarized in the Areas of Conservation Emphasis, as defined by subdivision (a) of Section 1851 of the Fish and Game Code, and in regional habitat connectivity assessments.

(ii) Wildlife corridors, such as migration corridors identified by global positioning system collar studies.

(iii) Wildlife movement barriers, such as connectivity areas, as defined by subdivision (a) of Section 158 of the Street and Highways Code, and barriers identified by the Department of Fish and Wildlife's Restoring California's Wildlife Connectivity report.

(iv) Other connectivity considerations, such as those outlined in the State Wildlife Action Plan, habitat conservation plans approved pursuant to Section 1539 of Title 16 of the United States Code, natural community conservation plans approved pursuant to Chapter 10 (commencing with Section 2800) of Division 3 of the Fish and Game Code, regional conservation investment strategies approved pursuant to Chapter 9 (commencing with Section 1850) of Division 2 of the Fish and Game Code, and other relevant plans, policies, and ordinances adopted by neighboring jurisdictions.

(7) In preparing to update the conservation element, the city, county, or city and county may consult with other appropriate local, state, or federal agencies, or academic institutions, as deemed appropriate by the city or county.

(8) The city, county, or city and county may meet the requirements in paragraphs (4) through (6), inclusive, in a separate component or section of the general plan entitled a wildlife connectivity element.

O25-2 cont'd.

Unlike other jurisdictions, such as Los Angeles County, which are updating their General Plans to comply with AB1889, it appears as though the City of Barstow and Barstow International Gateway Project are trying to push through a General Plan before the law goes into effect, rather than update the General Plan to comply with the law. O25-3

As proposed in the DEIR, the City of Barstow General Plan would be in effect until 2048! There are far fewer Open Space designations in the proposed General Plan in the DEIR than are currently in the 2015 General Plan. In fact, the majority of Open Space designations from the 2015 General Plan are now proposed to be Industrial or Commercial designations, including for the Barstow International Gateway Project. If built out, this would completely eliminate any opportunity to conserve habitat connectivity and wildlife movement during the next General Plan update. SC Wildlands strongly suggests the NO PROJECT ALTERNATIVE! O25-4

Furthermore, the DEIR only evaluated impact to wildlife movement for the Barstow International Gateway Project, not the entire proposed General Plan designations. The proposed mitigation measures are woefully inadequate and will not reduce the potentially significant impacts of the Barstow International Gateway Project to less than significant. Mitigation measures such as Biological Monitoring, an Awareness Program, and Salvage do absolutely nothing to reduce the level of impacts on wildlife movement to less than O25-5

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significant. The one proposed wildlife crossing structure is also not sufficient mitigation to reduce the level of impacts to wildlife movement to less than significant, especially since the glaring nighttime lighting, noise, and increases in traffic that the massive Barstow International Gateway Project will bring to the area, not to mention loss of over 4,000 acres of habitat, will make the need for that one measly crossing essential mute. O25-5 cont'd.

The California Deserts are the most intact area of the state and the Mojave River is an essential east-west landscape level connection. There are 3 California Department of Fish and Wildlife Barriers (2025) that overlap the City of Barstow boundaries, including Top Priority Barrier Brightline/Cave Mountain, Soda Mountain, Clark Mountain (W166), SR58 W Mojave (W205), and I-40 Barstow Area between Barstow and Newberry Springs (W220). Based on the Mojave River Barstow/Camp Cady (Map ID# DE16) 2km wide Linkage Buffer evaluated for the California Missing Linkages 25th Anniversary Symposium (resulting web map: California Missing Linkages 2000–2025: A Status Update), which includes a 1km buffer to either side of the river, this critical east-west landscape level connection is, as of 2024: 86% natural landcover, only 12% impervious surface, 31% protected/conserved, includes 5,000+ acres of critical habitat, and has about 24% overlap with NCCP/MSCPs. Within the 2km wide linkage buffer - 93% of the area is ranked 4 or 5 in the Terrestrial Connectivity dataset, with the majority being Conservation Planning Linkages with several hexagons within the City boundary identified as Irreplaceable and Essential Corridors. Within the 2km wide Linkage buffer - 58% is ranked 4 or 5 in ACE Irreplaceability, with many hexagons along the river and N-S between tortoise critical habitat ranked 4 or 5. Maintaining and conserving habitat connectivity and wildlife movement is essential to sustain biodiversity, ecological and evolutionary processes, and critical to the recovery of numerous imperiled species that have been documented during biological surveys for this DEIR. O25-6

SC Wildlands strongly recommends the NO PROJECT ALTERNATIVE and urges the powers that be to reject this DEIR and send the consultants for the City of Barstow and Barstow International Gateway Project back to the office to develop a DEIR that is commensurate with protecting and conserving habitat connectivity, wildlife movement and the habitat needs of the numerous imperiled species within the Sphere of Influence required to be evaluated. O25-7

Thank you for the opportunity to comment. Please feel free to contact me with any questions or requests for more data or information. O25-8

Respectfully submitted,

Kristeen Penrod

Kristeen Penrod, Director
SC Wildlands

RESPONSE TO COMMENT LETTER O25, SC WILDLANDS

O25-1 This is a general comment that includes introductory remarks and serves to introduce more specific comments, which are responded to in detail below. As a result, no specific response is provided here.

O25-2 This is a general comment that includes introductory remarks and serves to introduce more specific comments, which are responded to in detail below. To the extent commenter raises concerns about the Draft EIR's analysis that are best addressed by sharing technical and scientific information, this is also provided below. As a result, no specific response is provided here.

O25-3 As stated by the commentor, the statutory provisions enacted through Assembly Bill 1889 (AB1889) (Friedman, 2024), were approved by the Governor on September 27, 2024, and become mandatory upon an update of the Conservation Element that is required to take place on or after January 1, 2028. The comment summarizes the provisions of AB 1889, which do not require a specific response. See **Consolidated Response 04** concerning general non-CEQA issues.

O25-4 As stated by the commentor, the statutory provisions enacted through Assembly Bill 1889 (Friedman, 2024), which was approved by the Governor on September 27, 2024, are required upon an update of the Conservation Element that takes place on or after January 1, 2028. The City issued the Notice of Preparation for the EIR for the GPU Update on February 15, 2024. As a result, the City was already working on the GPU update before the adoption of the bill and was not trying to "push through" the GPU update before the law went into effect. The Draft General Plan is anticipated to be adopted in 2026. The City will address the requirements of state law upon the next update of its Open Space and Conservation Element that takes place on or after January 1, 2028.

O25-5 The 2015 General Plan contains and applies two open space (OS) designations to the General Plan area: ROS and IOS, defined below.

- "Interim Open Space" (IOS/ROS or IOS/RC) is actually a placeholder designation where the City determined that development was unlikely to occur by 2020 but would be appropriate at some point after 2020. The 2015 General Plan explicitly states: "It is anticipated that subsequent revisions to the General Plan will result in gradual, planned conversion of these lands to urban uses at such time as is warranted by market demand and economic viability."
- As stated in the 2015 General Plan, "Resource Conservation Open Space" (ROS or OS/C) was applied to "high environmental resource value, such as habitat for threatened or endangered species, scenic vistas or archaeological significance. The majority of these lands fall under public (e.g., BLM) or quasi-public (e.g., PG&E) ownership."
- Within the incorporated boundaries, the lands designated for IOS in the 2015 General Plan are proposed to become either Business Park or Industrial in the Draft General Plan. This is consistent with the intent expressed in the 2015 General Plan for conversion to

urban uses. While the 2015 General Plan only considered development potential through 2020, the Draft General Plan considers development potential through 2048. As such, the use of an "interim" designation was no longer deemed appropriate.

- Roughly half of the lands designated for ROS in the incorporated boundaries in the 2015 General Plan (around the interchange of Interstate 15 and State Highway 58) are proposed for Public/Quasi-Public use, enabling that area to be designated for public uses, which includes the current use as a freeway interchange and the potential for open space. In general, the City views areas around freeway-to-freeway interchanges to be less desirable for an open space designation. The area currently designated ROS to the south is currently owned by the federal government and is proposed to be an extension of a future master planned area to the south to be designated for Diverse Use, contingent upon a potential land swap or other land disposition by the federal government. The area currently designated ROS to the west was determined to be a logical extension of the proposed Business Park designation.
- Nearly all of the IOS and ROS designated lands are in the unincorporated portion of the City's SOI, which is governed by the County of San Bernardino. While the 2015 General Plan symbolizes the unincorporated SOI with City symbology, the County always had and continues to retain land use authority in the unincorporated SOI. Accordingly, the Draft General Plan opted to reflect the actual legal land use designations for the unincorporated SOI as determined by the County of San Bernardino. Even with this proposed adjustment, the fundamental land use patterns of open space remain largely consistent between the 2015 and Draft General Plans. Moreover, the City's 2015 General Plan IOS designation, even if it could be applied to the unincorporated SOI, allows for future urban development, while the Draft General Plan proposes most of the IOS-designated lands to be mapped as Resource/Land Management, which is more closely aligned with resource conservation.
- Finally, of the lands within the boundaries of the proposed BIG Specific Plan (currently incorporated and currently unincorporated), the 2015 General Plan designates essentially all (99.9%) as either Industrial, Diverse Use, or Estate Residential.

The General Plan planning horizon is 2048, as noted on page 2-1 of the Draft EIR, which is typical for general plans. However, there are methods for updating and changing the General Plan during this 20-year-period. Government Code § 65358(b) allows the City to make four general plan amendments by April 1 of each year, and Government Code § 65400(2) requires an annual report on the General Plan, and it is common practice for cities to review their general plans every 5 – 7 years for compliance with new state laws, court decisions, or changing development patterns.

O25-5 See **Response O25-4**.

O25-6 This comment will be shared with decision makers. As it does not address any inadequacies of the Draft EIR, no further response or revisions are warranted.

O25-7 See **Responses S8-57** through **S8-66** concerning the analysis provided in the Draft EIR regarding potential wildlife movement impacts and mitigation requirements that allow for the conclusion of a less than significant impact on this resource. **Response S8-61** provides a summary of the overall compensatory mitigation framework that would offset BIG's habitat impacts, as required by the Draft EIR and consistent with CEQA requirements.

O25-8 This comment expresses concern about the ecological importance of the Mojave River corridor and regional connectivity, citing CDFW-identified barriers, California Missing Linkages data, and Terrestrial Connectivity and ACE Irreplaceability rankings. **Draft EIR Section 5.4: Biological Resources** and supporting **Appendix 5.4 BIG-1** evaluates the project site in both a local and regional context, as noted in **Response S8-57** through **S8-60** and **S8-62**. **Draft EIR Appendix 5.4 BIG-1** also maps the project site's intersection with regional connectivity zones mentioned in this comment, including the Terrestrial Connectivity Area of Conservation Emphasis (ACE), California Desert Linkage Network, CEHC Potential Riparian Connection, CEHC Essential Connectivity Area, and the Mojave River – Barstow/Camp Cody Linkage identified in the Missing Linkages project (see **Draft EIR Appendix 5.4 BIG-1 Figure 3.5-1**). Mitigation measures described in the Draft EIR, including **MM BIG BIO-32** and **MM BIG BIO-34**, address wildlife connectivity through and adjacent to the project site and these mitigation measures have been updated with additional details per **Response S8-66** and **S8-67**. The Draft EIR provides a regional context for connectivity impacts and identifies feasible, enforceable measures to address wildlife movement, in accordance with CEQA requirements.

O25-9 The commenter expresses support for the No Project Alternative and urges a more protective evaluation of habitat connectivity, wildlife movement, and imperiled species. The Draft EIR analyzes a reasonable range of alternatives, including a No Project Alternative, as required under CEQA, and evaluates implications of the various alternatives for biological resources, including wildlife connectivity and habitat for special-status species. Comments regarding the merits of the Project or alternatives to the Project do not raise a significant environmental issue or specific questions about the analyses or information in the Draft EIR that would require response pursuant to State CEQA Guidelines § 15088. A No Project Alternative would not impact biological resources; however, a No Project Alternative does not meet the Project objectives. The Draft EIR and supporting **Draft EIR Appendix 5.4 BIG-1** provide a site-specific and regional assessment of wildlife movement, connectivity, and habitat impacts for BIG, and identify mitigation measures that are feasible, enforceable, and designed to reduce impacts to less-than-significant levels.

O25-10 See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER O26, BARSTOW POLICE DEPARTMENT MANAGEMENT ASSOCIATION

O26

Barstow Police Management Association Resolution of Support

Thomas Lewis

Mon 1/26/2026 9:17 AM

To: GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

2 attachments (113 KB)

Thomas Lewis.vcf; Resolution_Of_Support_BNSF.pdf;

Please see attached document for the Barstow Police Management Association Resolution of Support

Thomas Lewis
Barstow Police Department
Lieutenant
220 E. Mountain View St.
Suite B
Barstow, CA 92311

Desk# (760) 255-5187
Fax# (760) 255-2025

RESOLUTION OF SUPPORT FOR
BARSTOW INTERNATIONAL GATEWAY (BIG)

RECITALS

WHEREAS, the railroad has been a part of the history of Barstow and the surrounding communities since the 1800s; and, O26-1

WHEREAS, BNSF is preparing to build a 4500-acre facility also known as BARSTOW INTERNATIONAL GATEWAY (BIG) to more efficiently move goods by rail from the ports of Los Angeles across the country; and, O26-2

WHEREAS, construction of the BIG facility will cost $4 billion and is expected to open in 2028; and, O26-3

WHEREAS, the City of Barstow has prepared an Environmental Impact Report including BIG/ Specific Plan and General Plan Update which demonstrates that the City is fully prepared to provide municipal services for the project; and, O26-4

WHEREAS, this project will bring thousands of livable-wage jobs to Barstow; and, O26-5

WHEREAS, Barstow College is prepared to assist in training future employees for BIG; and, O26-6

WHEREAS, BNSF has agreed to give hiring preference to local hires; and, O26-7

WHEREAS, BIG will result an increase in property and sales taxes allowing the City of Barstow to serve the project as well as improve services throughout the City; and, O26-8

WHEREAS, BNSF agrees to allocate additional property tax funding for local Police Officers and Firefighters; O26-9

NOW, THEREFORE BE IT RESOLVED THAT THE BOARD OF DIRECTORS OF THE (Name of organization/agency/district) FULLY SUPPORTS THE APPROVAL OF THE UPDATED BARSTOW GENERAL PLAN AND THE CONSTRUCTION AND OPERATION OF THE BARSTOW INTERNATIONAL GATEWAY. O26-10

Passed, Approved and Adopted by the Barstow Police Department Management Association this 26th day of January, 2026. O26-11

By _____

Daniel Arthur, Board President

Barstow Police Department Management Association

By _____

Frank Benitez, Board Secretary

RESPONSE TO COMMENT LETTER O26, BARSTOW POLICE DEPARTMENT MANAGEMENT ASSOCIATION

O26-1 through O26-11 Thank you for your comment. See **Consolidated Response 04** concerning general non-CEQA issues.

2.6 INDIVIDUAL COMMENT LETTERS AND RESPONSES

Please note that the comment letters appear in this Final EIR in the chronological order in which they were received. Letters that were similar have been grouped together and a response provided in a single response. As such the numbering of letters in this section may not be consecutive.

COMMENT LETTER I1

I1

Genesis Crank

From: Greg Thomson <gthom1122@aol.com>
Sent: Sunday, November 9, 2025 1:48 PM
To: GeneralPlan@barstowca.org
Subject: Train traffic at Helendale crossing

[NOTICE: THIS IS AN EXTERNAL EMAIL]
Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!

Caution! This message was sent from outside your organization.

The Vista train crossing in Helendale has seen added time waiting for trains to cross. It WILL get worse with BIG. What is going to get done to remediate this. There are times when the train just stops at the intersection and we have to wait over ten minutes for it to start up again. We never know how long the train will remain stationed on the tracks. I want BIG to happen but I don't want extended times waiting for trains to cross. I would like to know what will be done to alleviate this. I1-1

Greg Thomson
26546 Anchorage Lane, Helendale
909-801-1548

1

RESPONSE TO COMMENT LETTER I1, GREG THOMSON

I1-1 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, and **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at the Silver Lakes/Helendale Community at-grade crossings.

RESPONSES TO GROUP SUPPORT LETTER 1

The comment letters listed in the table below are letters of support received by the City. As the letters raised the same issues, a single response to the comments has been provided. In the table below, the letter number is followed by the commenter's name. In instances where the name was not legible or missing, the commenter's name is included as "Public Comment." The letters listed in the table below can all be found posted on the City's website at: https://www.barstowca.org/departments/community-development-department/planning/general-plan-update. As these comment letters repeatedly utilized a similar letter that raised the same issues, the responses applicable to all these comment letters have been provided in the first of these letters (i.e., I2, Robyn Morgan) in the following pages.

I2	Robyn Morgan	I32	Public Commentor 5	I57	Marques Williams
I3	Vicky Terrill	I33	Public Commentor 6	I58	Public Commenter 26
I4	Raquel Trujillo	I34	Public Commentor 7	I59	Public Commenter 27
I5	Robin Davis	I35	Public Commentor 8	I60	Public Commenter 28
I8	Richard Kruse	I36	Public Commentor 9	I61	Public Commenter 29
I10	Aricka Brown	I37	Ronald Beady	I62	Public Commenter 30
I11	Deborah Taylor	I38	Public Commentor 10	I63	Public Commenter 31
I12	Gail Piper	I39	Public Commentor 11	I64	Public Commenter 32
I13	Robin Davis	I40	Public Commentor 12	I65	Public Commenter 33
I14	Kevin Chen	I41	Public Commentor 13	I66	Public Commenter 34
I15	Sean O Connell	I42	Public Commentor 14	I67	Dominique Bergland
I16	Ai Takashima	I43	Public Commentor 15	I68	Tiffany McClendon
I17	Mert Kocyigit	I44	Juan Carlos Gaitan	I69	Public Commenter 35
I18	Anthony Perez	I45	Nicole Michael	I70	Tiffany S, Dec. 1, 2025
I19	David Valenz	I46	Public Commenter 16	I71	Public Commenter 36
I20	Miriam Inday	I47	Public Commenter 17	I72	Edurado C
I21	Hilary Claveau	I48	Public Commenter 18	I73	Public Commenter 37
I22	Katie Bogdan	I49	Public Commenter 19	I74	Public Commenter 38
I23	Michelle Salazar	I50	Public Commenter 20	I75	Enrique Garcia
I25	Jim Eruyan	I51	Public Commenter 21	I76	Public Commenter 39
I27	Patty Negrette	I52	Public Commenter 22	I77	Public Commenter 40
I28	Scott Godfrey	I53	Public Commenter 23	I78	Victor Ortiz
I29	Public Commentor 2	I54	Shauna Swarens	I79	Public Commenter 41
I30	Public Commentor 3	I55	Public Commenter 24	I80	Dariana Martinez
I31	Public Commentor 4	I56	Public Commenter 25	I81	Leri Howell

I82	Lisa Meraz	I117	Public Commenter 42	I161	Elijah Otere
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I1986 Mario Ramirez
I1987 Esthela Jacobo
I1988 R Imbriani
I1989 Melissa Kruse
I1990 Bryan K

COMMENT LETTER I2

From: Robyn Morgan
To: GeneralPlan@barstowca.org
Subject: FW:
Attachments: [Untitled].pdf
Sent: 11/10/2025 10:50:29 AM

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Caution! This message was sent from outside your organization.

Please see my support in favor of the BNSF Big Project…Let's get her done!



Robyn Morgan, CRS
DRE License# 01178113
Coldwell Banker Home Source
760-954-3096
Robyn.m@cbhomesource.com
18484 US Hwy 18, Ste 150, Apple Valley, CA 92307



From: Coldwell Banker Hwy 18 <scans@inlandds.com>
Sent: Monday, November 10, 2025 10:48 AM
To: Robyn Morgan <Robyn.m@cbhomesource.com>
Subject:

Date

Dear Mayor Silva and Barstow Council Members,

I am writing to express my strong support for the BNSF Barstow Industrial Gateway (BIG) Project. This project represents a tremendous opportunity for Barstow—one that will create thousands of jobs and give our young people countless reasons to build their futures right here at home. I2-1

The railroad has always been an integral part of Barstow's history, with many of our early residents coming here to work for Santa Fe. The new state-of-the-art BIG facility is a $4 billion investment in our community that will carry that legacy forward, attracting a new generation of workers and their families while reinforcing Barstow's role as a vital hub of commerce and industry. I2-2

In addition to job creation, this project will generate significant economic growth, stimulate local businesses, and increase tax revenue to support essential services such as our schools, police, and fire departments. I2-3

By shifting freight from trucks to rail, the BNSF BIG Project will reduce truck traffic on freeways (particularly in Southern California and the Inland Empire). This means less downstream truck-traffic impact in neighboring congested areas improving air quality regionally. BNSF will be using "zero- and near-zero-emission cargo-handling equipment" at the facility, helping with environmental impact I2-4

The BNSF BIG Project is a transformational project — it's the right fit for our community's future. I respectfully encourage the Barstow City Council to approve this project. I2-5

Sincerely,

Robyn Morgan
Real Estate Agent
Cold Well Banker Home Source

RESPONSE TO COMMENT LETTER I2, ROBYN MORGAN

I2-1 through I2-5 See **Consolidated Response 04** concerning non-CEQA issues.

COMMENT LETTER I6

I6

Subject: Public Comment on Barstow General Plan Update and International Gateway Project – Impacts to Silver Lakes / Helendale

To: generalplan@barstowca.org
Cc: (Helendale CSD, First District Supervisor Paul Cook)

Dear City of Barstow Planning Department,

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Barstow General Plan Update and International Gateway (BIG) Project. I am a resident of the Silver Lakes community in Helendale, located along the BNSF main rail line between Victorville and Barstow. I am deeply concerned about the impact that this project will have on our community's safety, accessibility, and overall quality of life.

I6-1

While I understand the importance of the BIG project to regional and national supply chain logistics, its success must not come at the expense of nearby residential communities. The Silver Lakes community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary ingress and egress point. With the significant increase in rail activity expected from the BIG project, these delays are likely to worsen, posing serious risks for emergency response times, school transportation, and the daily movement of residents and workers.

To the extent these issues are not already fully analyzed, I respectfully request that the DEIR and Final EIR clearly address the following:

I6-2

- **Rail Traffic and Gate-Down Time**: Clearly quantify the projected increase in train frequency and train length, and describe the resulting crossing closures and delays at the Vista Road railroad crossing.

- **Emergency Access**: Assess impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass or underpass) or an alternative access route for Silver Lakes.

I6-3

- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small communities along the line, not only within Barstow but also in Helendale, Oro Grande, and other populated areas along the affected rail corridor.

I6-4

- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or equivalent emergency access solutions for Silver Lakes before project operations increase train traffic through our area.

I6-5

Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region.

I6-6

Many of us support responsible development and recognize the economic benefits this project may bring, but safety and accessibility for surrounding communities must be prioritized. I6-6 cont.

Thank you for considering these concerns. I respectfully request that the City of Barstow include Silver Lakes and Helendale in its environmental impact analysis and ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I6-7

Sincerely,

Jeremiah Jones
26524 Blue Water Rd.
P.O. Box 1392
Helendale, CA 92342

RESPONSE TO COMMENT LETTER I6, JEREMIAH JONES

I6-1 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 06-03** concerning community safety, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings.

I6-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings; and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/ Helendale Community.

I6-3 See **Consolidated Response 06-03** concerning community safety; **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community; **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings; **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings; and **Consolidated Response 10-04** concerning the increased rail activity's effects regarding traffic delays and school transportation needs at Silver Lakes/Helendale Community at-grade crossings.

I6-4 See **Consolidated Response 06** concerning potential effects on communities; **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/ Helendale Community; and **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community.

I6-5 and I6-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation; **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community; **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/ Helendale Community at-grade crossings, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I6-6 See **Consolidated Response 06** concerning potential effects on communities; **Consolidated Response 06-03** concerning community safety; and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

COMMENT LETTER I7

I7

From: GeneralPlan@barstowca.org
To: Colin Drukker; Cory Witter
Subject: FW: Public review/Comment
Date: Tuesday, November 18, 2025 9:09:05 AM
Attachments: Barstow Gen Plan notes.docx

From: Nicholas Hensley <nahensley0369@gmail.com>
Sent: Friday, November 14, 2025 1:54 PM
To: GeneralPlan@barstowca.org
Subject: Public review/Comment

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Please see attached at your convenience.

The enormity and detail of the Barstow general plan indicates what a colossal effort it must have been to complete. It is most impressive. I7-1

I sincerely hope that this is what was intended for inputs during the public review and comment period. If not, I apologize.

Respectfully Submitted

N. A. Hensley, Barstow CA.

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November 14, 2025

Barstow General Plan Notes

Policy LU-2.4 Medical Professionals and Services.

The climate of Barstow is favorable to pharmaceutical company manufacturing. Coupled with multiple commerce modes available, it may be a desirable location for medium sized companies that do not have sufficient capital to leave the state. If it is possible, we could actively seek out companies and recruit them (across the economic spectrum, generally as well). If we can, we should use targeted tax, fee and charges structure to make investment here as attractive as possible. This could also be synchronized with *Policy OSC-8.4 Building Design and Upgrade* to facilitate commercial building design that is self-sufficient prioritized with energy first. Additionally, conditions could be implemented that support *Policy PFS-2.5 Local Workforce Priority*. Our location and our climate is beneficial to multiple industries. I7-2

Policy LU-2.7 County Development.

Incorporation of immediate peripheral areas into the city's revenue stream should increase funds. Though I am not informed on the history or of any controversy on this matter, if it is desirable a multi-phased approach may make it more actionable. It further could make it more palatable for those who opposite the idea. Small incorporations at a time would also be more manageable, and over time efficiencies would be built in the process (if applicable). I7-3

Goal S-2 A prepared community able to withstand and recover from emergencies, natural disasters, and climate related hazards.

From a structural and budgetary standpoint it may not be possible to build a local sub-staff similar to an Office of Emergency Services (OES). This may not limit us to the availability of the Non-Disaster Grant Programs available, I assume. Federally there are four general I7-4

program categories with numerous grants nested in them, and the State of California also has an additional five which are equally dense. If, due to the fact that, there is no localized "Barstow OES" it may be desirable to restructure, reorganize, or redesignate existing departments in a way that maximizes state and federal grant applicability. The non-disaster grants focus on prevention, preparedness, mitigation, and resilience. Lastly all this effort could be tied to *Policy PFS-2.4 Local Workforce Training*.

I7-4 cont.

The federal program categories are Preparedness, Resilience, Training, and Food and Shelter.

The state program categories are Homeland Security, Emergency Management, Infrastructure Protection, Cyber Security, and Emergency Operations Centers.

It is very clear what a colossal task developing this plan was.

RESPONSE TO COMMENT LETTER I7, N.A. HENSLEY

I7-1 through I7-4 See **Consolidated Response 04** concerning non-CEQA issues. Additionally, no revisions to the General Plan policies are proposed by the commenter. All letters, including this letter, constitute part of the public record that will be available to decision makers as part of the EIR.

COMMENT LETTER I9

From: GeneralPlan@barstowca.org
To: BarstowBIG@chwlaw.us; Colin Drukker; Cory Witter
Cc: Matthew Summers; Taylor M. Anderson; Adam N. Mentzer
Subject: FW: generalplan@barstowca.org
Date: Friday, November 21, 2025 2:11:26 PM

From: Mart Family <deemart43@yahoo.com>
Sent: Wednesday, November 19, 2025 8:58 PM
To: GeneralPlan@barstowca.org
Subject: generalplan@barstowca.org

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Is BNSF using Tier 4 or Tier 5 diesel powered trains for the BIG project? I9-1

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RESPONSE TO COMMENT LETTER I9, MART FAMILY

I9-1 **Draft EIR Section 3.0: Project Description** (pages 3-47 through 3-51) outlines that BIG would utilize Tier 4 switcher locomotives and Tier 4 linehaul locomotives. Tier 4 switcher locomotives would move blocks of containers to different tracks to combine blocks destined for similar destinations. The proposed block swap yard would allow for the transfer of multiple railcars, or "blocks" of intermodal rail cars between trains through the use of Tier 4 switcher locomotives. Furthermore, the dedicated fleet of Tier 4 linehaul locomotives would move cross-dock intermodal containers between the Ports and the BIG intermodal facility.

COMMENT LETTER I24

From: GeneralPlan@barstowca.org
To: BarstowBIG@chwlaw.us; Colin Drukker; Cory Witter
Subject: FW: BNSF Support Letter
Date: Tuesday, December 2, 2025 10:46:03 AM
Attachments: Outlook-2ml0cenn.png
Outlook-xwallsc1.png
Outlook-re020aun.png
image001.png
image002.png
image003.png
image004.png
image005.png
image007.png
BNSF Support Letter Dec. 1, 2025.pdf

Economic Development Specialist

City of Barstow
Genesis Crank
760-255-5152
gcrank@barstowca.org

220 East Mountain View St.
Suite A
Barstow, CA 92311
www.barstowca.org

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From: Timothy Brinkley <timothy_brinkley@busdk12.com>
Sent: Tuesday, December 2, 2025 6:10 AM
To: GeneralPlan@barstowca.org; Michael Lewis <quigleysbarstow@yahoo.com>
Cc: Patty Negrette <patty@expfuture.org>
Subject: BNSF Support Letter

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Attached is my letter of support for the BNSF BIG Project. I24-1

Timothy Brinkley
Barstow High School † Educator † PBIS Lead † Robotics Club Advisor † Room 23
Computing & Robotics: LAND ♥ College & Career Readiness

timothy_brinkley@busdk12.com †
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FAVORITE QUOTES:

The oldest, shortest words, 'yes' and 'no', are those which require the most thought. ~Pythagoras

The mere imparting of information is not education. Above all things, the effort must result in making a man think and do for himself. ~Carter G. Woodson

If you want to go fast, go alone; if you want to go far, go together. ~African Proverb

"I attack ideas. I don't attack people. And some very good people have some very bad ideas. And if you can't separate the two, you gotta get another day job. You don't want to be a judge. At least not a judge on a multi-member panel." ~Antonin Scalia

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December 1, 2025

Dear Mayor and Members of the City Council,

I want to commend the City Council's steadfast leadership in advocating for the Barstow International Gateway (BIG) project, particularly your decisive lobbying efforts regarding the CARB In-Use Locomotive Regulation. Your "*Hub of the West*" initiative has effectively highlighted the project's macro-economic potential. However, after doing some comprehensive research into the project's technical, environmental, and operational filings I, with the help of my drone feasibility study for Barstow Community College and Google Gemini, have uncovered specific, high-impact details that appear to be absent from the current public discourse. We believe incorporating these quantitative and technical points into your advocacy will significantly strengthen Barstow's position against regulatory and environmental critics. I24-2

1. Critical Healthcare Infrastructure Specifics While the support of Barstow Community Hospital CEO Adam Loris is well-known, our review of regulatory filings indicates the Council may not be fully leveraging the specific metrics of the hospital's growth plan. The project is acting as a catalyst for a planned **expansion of hospital capacity from 30 to 50 beds**. This specific target is strategically significant, aligning with federal rural healthcare reimbursement thresholds. Furthermore, there is a targeted goal to achieve a **70-80% local retention rate** for the healthcare workforce. We recommend citing these specific figures to demonstrate that BIG is driving a measurable upgrade in public health infrastructure. I24-3

2. The "130-Mile" Environmental Standard Your advocacy has rightly focused on general congestion relief. To bolster this argument, we recommend citing the specific "per-container" reduction metric found in technical project documentation. By moving the transload point to Barstow, the project eliminates approximately **130 miles of round-trip truck travel per container**. At the projected volume of 5,000 trucks per day, this equates to removing **650,000 daily truck miles** from the region's highways. This is a concrete, mathematically defensible statistic that underscores the project's necessity for the entire Southern California air basin. I24-4

3. Advanced Technology & "Digital Twin" Construction Beyond the recognized welding partnership with Barstow Community College (BCC), the technical scope of the project is more advanced than generally articulated. I24-5

- **Digital Twin Utility Mapping:** Engineering partners (Typsa) are utilizing advanced **Building Information Modeling (BIM)** to create a "Digital Twin" of the site, mapping over **45 km of underground public utility networks** prior to breaking ground. Publicizing this advanced mitigation strategy can alleviate resident concerns regarding utility disruptions during construction.
- **Operational Drone Integration:** BCC plans to develop a sUAS drone program which is not merely educational; it aligns with BNSF's internal **"Pathfinder" program**, which utilizes FAA Part 107 certified pilots for remote infrastructure inspection. This positions Barstow not just as a rail hub, but as a center for aerospace-adjacent technical operations.

I urge the Council to integrate these specific data points—particularly the hospital expansion targets and the 130-mile reduction figure—into future resolutions and community messaging. These details transform the narrative from a general economic promise to a sophisticated, data-driven case for Barstow's future. I24-6

Sincerely,

Timothy J Brinkley, MBA, M.Ed.
Barstow High School Teacher
Barstow Community College Faculty

RESPONSE TO COMMENT LETTER I24, TIMOTHY BRINKLEY

I24-1 This comment references the comments included below as part of a letter of support.

I24-2 This comment is an introductory comment emphasizing the importance of highlighting additional Project benefits; comment has been noted.

I24-3 See **Consolidated Response 04** concerning general non-CEQA issues. This comment does not raise any specific issues or questions on the environmental analysis provided in the Draft EIR. No changes to the Draft EIR are needed.

I24-4 The alternative methodology for calculating heavy-duty truck miles traveled (TMT) identified in this comment is noted. The methodology used in the Draft EIR for estimating TMT is discussed in the Draft EIR beginning page 5.15-76. The Draft EIR concludes that BIG would reduce TMT, as noted in the comment and discussed in **Draft EIR Section 5.15: Transportation** (pages 5.15-74 through 5.15-78). It is noted, the analysis of the TMT attributable to BIG operations that is provided in the CEQA Assessment independent of VMT does not inform the transportation impact analysis under CEQA. BIG's analysis considered TMT separately in other environmental topic areas (e.g., Air Quality, GHG, and Noise). Therefore, additional discussion regarding TMT savings per container is not warranted.

I24-5 The commenter encourages the use of digital twin utility mapping to alleviate concerns regarding utility disruptions during construction. However, as discussed in **Draft EIR Section 5.17: Utilities and Service Systems** (pages 5.17-58, 5.17-62 through 5.17-63, 5.17-68, 5.17-71), BIG would minimize disruption of utility services by coordinating with GSWC or other water districts (as applicable), SCE, Southwest Gas, the appropriate telecommunication provider, and the City, and would be consistent with proposed General Plan Policy PFS-1.11 Coordination on improvements in the right-of-way. No changes to the Draft EIR are required.

The commenter suggests the use of drones during operations for remote infrastructure inspection. This comment does not raise any specific issues or questions on the environmental analysis provided in the Draft EIR. No changes to the Draft EIR are required.

I24-6 See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER I26

From: GeneralPlan@barstowca.org
To: BarstowBIG@chwlaw.us; Colin Drukker; Cory Witter
Subject: FW: BNSF Project ?'s
Date: Tuesday, December 2, 2025 11:33:38 AM
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png

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From: angels4mel@aol.com <angels4mel@aol.com>
Sent: Tuesday, December 2, 2025 11:12 AM
To: GeneralPlan@barstowca.org
Subject: BNSF Project ?'s

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Will the Sylvan Community be blessed with BNSF supplying materials & installation of the waterlines with Golden State, all of the community including ones with private wells? Thank you! I26-1

Sent from the all new AOL app for iOS

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RESPONSES TO COMMENT LETTER I26, PUBLIC COMMENTER 1

I26-1 **Draft EIR Figure 3-20: BIG Proposed Water Improvements** (page 3-60) maps BIG's proposed water lines. BIG does not propose new water lines along Sylvan Avenue.

COMMENT LETTER I120

I120

Good day City of Barstow Mayor Silva, Council, and Project Planners/Consultants;

I am writing to request an additional minimum of 45 days, if not more, to fully comprehend the scope of this project. If the impact is to be transformative at Federal, State, County and City levels – an open review and comment period of 45 days is NOT significant (thank you for considering holidays - for a total of 57 days). However, this is life altering. We need to do this right, and we only have one shot. I understand that you can support this request to extend the review time if the voting parties agreed to. I120-1

Asking for this period of time to be moved through "as quickly as possible" and to sign blanket letters of support, when residents do not know what is being considered, is not environmental justice for those who lives will be taking the toll of this proposed development nor being a "good neighbor" and considering the "health for everyone".

Yes, we can celebrate the release of this long-awaited BNSF Specific Plan, Draft Environmental Report (E.I.R) and finally - an update to Barstow's outdated City Plan.

The intimidating size of this document combines more than one matter of interest. Again, this boosted report of "18,000 pages of text and 60,000 pages of images", refers to language of multiple areas of interest regarding:

1) General Plan for Barstow City
2) The BNSF Barstow International Gateway Project (B.I.G) Specific Plan
3) The Draft Environmental Impact Report
4) As well as alternative options to development, no B.I.G., 'overriding considerations', offered potential mitigations with reasons for why they are 'may be' infeasible, as well as many other topics of concern.

I120-2

There is a community of Sylvan Avenue residents, (who reside in the County of San Bernardino and within feet of this proposed project), who will be holding the burden of this project 'significantly, and unavoidably' on our health, safety, home values and our way of rural living.

Please note, there are many medical documented studies displaying the negative effects of living near a railroad yard. Please also do consider this is being THE largest rail development (~4,700 acres) to date AND we will be imposed on by these impacts, 24 hours a day/365 days a year, by change from a quiet – calm – community of current minimal stimulants to 100% on our:

1) Nervous system, auditory annoyances and stress responses contribute to lower quality of life and long-term consequences
2) Cardiovascular system: hypertension and distress
3) Respiratory system, impaired lung function, asthma and cancer
4) Ability to Sleep due imposed on environmental factors
    a. Exposure to light pollution (100% change from zero, losing the view of horizons - mountain ranges and Mojave River, as well as the dark night sky. Some of us live for everyday sunrise and sunset).
    b. Exposure to increase of vibration (home foundations, walls, and 'sensitive receptors'/AKA nervous system)

I120-3

c. Exposure to increase of sound (engines, brakes, horns, new 70 mph main lines/ lead merging lines/swap yard lines, constant sorting and movement of shipping containers to construct new lines of travel or warehouse storage and nighttime movement). I120-3 cont'd

5) Safety: getting in and out of our community without turning lanes with the proposed increase of employee entrance travel, the potential increase of vandalism and crime that comes along the other side of the tracks with railroad and solar panel property theft-again, being County and having Sheriff Office Emergency Services rather than the proposed increase to only Barstow City Police Department. I120-4

6) Water availability: quantity and quality with effects on Community and Private Wells. I120-5
   a. What happens when water tables drop and the depths of wells (which vary at levels) begin to have issues?
   b. What happens when toxin levels begin to concentrate?

7) Concern for protection of our home and property values. I120-6
   a. In a private meeting with BNSF/Barstow Project Manager, County Representative, City Personnel, Engineer, Mojave Water Agency and a group of local Real Estate agents – we were informed that while the City of Barstow may gain margins, we would most likely be minimal and equated our lands to an area of town that has been negatively impacted.
   b. The General Plan and Specific Plan does not want future residential development out here on the West side of town.
   c. Identification of DUC – disadvantaged unincorporated community as support for environmental justice is of extreme importance to us to get help.

8) Loss of wildlife, which we truly enjoy out here (desert tortoises, quail, roadrunners, tarantulas, desert foxes, owls, lizards, ground squirrels and generations of ravens). Noting with ground movement and loss of this ecosystem balance – this will uproot more mojave green and rattlesnake encounters on our properties. I120-7

By describing the project area simply as 'undeveloped desert,' the Draft E.I.R. is very vague to the fact that real, long-standing residential communities live at the project's edge. This framing misleads the uninformed reader and minimizes the substantial health and quality-of-life impacts faced by several residents such as those on Sylvan Avenue Community. I120-8

As someone who has vested 3 years of my life to showing up in involvement and engaging in questions, outreaching for help and learning more about advocacy – I am actually attempting to read and understand the draft environmental impact report, cross referencing the Chapter references and Appendices. How does one grasp the lifelong change that will be significantly environmentally impacting the health, safety, property value and way of life in such a short period of time ... I120-9

I respectfully request that the open review and comment period be extended and that we work together as a Community, City of Barstow, County of San Bernardino, State of California and as a nation to put people before profit. I120-10

Diligently passionate about life and well-being, of stepping into service – I appreciate your time and consideration. I will submit further comments as I continue to move through this report.

Sherry Baily Sylvan Ave. Resident, Barstow CA dated 12/05/2025



RESPONSES TO COMMENT LETTER I120, SHERRY BAILY

I120-1 See **Consolidated Response 01** concerning community outreach and the Draft EIR public review period.

I120-2 The comprehensive nature of the Draft EIR is intended to provide a thorough evaluation of the proposed Project and is structured to present clear and accessible information on each topic area, including Project Description, Environmental Impacts, Alternatives, and Mitigation Measures. This approach is designed to support public understanding and informed participation in the environmental review process. Extensive public outreach and engagement efforts were undertaken to provide residents and stakeholders with multiple opportunities to review materials, ask questions, and provide input. To further assist the public, a CEQA 101 video was produced specifically for this Project and is available on the City's website and YouTube channel. This video educates viewers on the CEQA process and provides practical insights on how to read an EIR, including guidance on where to find the information you are looking for within the document.

Although the document does not contain 60,000 pages of images, the figures included are intended to provide visual clarity and context, helping readers interpret technical information and understand potential environmental effects more easily. The Draft EIR evaluates both the proposed General Plan and BIG. This integrated approach allows for a complete understanding of how the proposed Project interacts with planning policies and environmental considerations.

The commenter's concerns regarding health, safety, property values, and rural character are acknowledged. All issues, except for property values (which is not an environmental topic; see **Consolidated Response 04** concerning general non-CEQA issues) were analyzed in detail within the Draft EIR, including assessments of aesthetics (**Draft EIR Section 5.1**, pages 5.1-24 through 5.1-79), air quality (**Draft Section 5.3** pages 5.3-1 through 5.3-201), noise (**Draft Section 5.12**; pages 5.12-1 through 5.12-173), traffic (**Draft Section 5.15,** pages 5.15-1 through 5.15-213), and other environmental factors, as well as consideration of alternatives and mitigation measures. Additionally, see **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 06-02** concerning the role of social and economic issues under CEQA, **Consolidated Response 06-05** concerning decreased property values. Where impacts were determined to be significant and unavoidable, this is clearly identified in the document, along with an explanation of why certain mitigation measures may be infeasible.

Based on this analysis and the extensive outreach conducted, the Draft EIR provides the information required under CEQA to allow decision-makers and the public to fully understand the Project's potential impacts, consider alternatives, and evaluate mitigation measures. This comprehensive approach supports informed participation and transparency throughout the environmental review process.

I120-3 The Draft EIR includes a comprehensive analysis of potential health and quality-of-life impacts associated with living near BIG, specifically addressing air quality, noise, vibration, and light pollution.

Draft EIR Section 5.3: Air Quality evaluates BIG's potential to generate air pollutant emissions, including diesel particulate matter (DPM), which is associated with respiratory and cardiovascular health risks, as well as cancer. The Draft EIR includes dispersion modeling and a Health Risk Assessment (HRA) that quantifies the cancer risk, chronic hazard index, and acute hazard index for sensitive receptors near BIG. The analysis discloses that, even after implementation of all feasible mitigation measures (**MM BIG AQ-1** through **MM BIG AQ-14**), cancer risk at some residential receptors would exceed the CEQA significance threshold of 10 in one million, resulting in a significant and unavoidable impact; see **Draft EIR Table 5.3-36: Carcinogenic Risk Assessment (Operations Only)** and **Table 5.3-37: Carcinogenic Risk Assessment (Construction and Operations)** (pages 5.3-142 through 5.3-144). Mitigation Measures **MM BIG AQ-1** through **MM BIG AQ-14** address the implementation of fugitive dust control, equipment emissions standards, use of renewable diesel and low-VOC materials, truck idling and routing controls, and design features that support future electrification. The Draft EIR also discusses cumulative impacts and the additive effect of BIG with other sources, such as the existing Barstow Yard and proposed Logistics Facility; see **Draft EIR Sections 6.6.3** and **6.6.5**. **Draft EIR Section 6.0: Cumulative Impacts** considers the combined effects of BIG with other past, present, and reasonably foreseeable projects in the area, including the existing Barstow Yard and proposed Logistics Facility. The Draft EIR discloses that BIG's cumulative air quality, noise, and health risk impacts would be significant and unavoidable, and that BIG's incremental contribution would be cumulatively considerable. CEQA defines "cumulatively considerable" as when "the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."[1]

Draft EIR Section 5.12: Noise and Vibration addresses potential noise and vibration impacts from both construction and operation of the rail yard, including effects on the nervous system, sleep disturbance, and quality of life. The Draft EIR includes detailed noise modeling for various scenarios (Opening Year 2028, Interim Year 2033, Horizon Year 2048) and compares predicted noise levels at sensitive receptors to City and County standards, as well as incremental increase thresholds; see **Draft EIR Tables 5.12-29: Opening Year 2028 BIG Operational Noise Levels – City/County Noise Standards Impact Analysis** through **Table 5.12-52: Horizon Year 2048 Mitigated BIG Operational Interior Noise Levels – Noise Increase Impact Analysis**(pages 5.12-82 through 5.12-113). The analysis finds that, even with mitigation (**MM BIG NOI-1** and **MM BIG NOI-2**), noise levels at several residential receptors would exceed applicable standards and/or result in a substantial noise increase, constituting a significant and unavoidable impact; see **Draft EIR Impact 5.12-1** pages 5.12-74 through 5.12-129. **MM BIG NOI-1** and **MM BIG NOI-2** are to reduce construction and operational

[1] State CEQA Guidelines § 21083(b)(2).

related noise impacts on nearby sensitive receptors through implementation of a Nighttime Construction Noise Logistics Plan, on-site noise controls, advance notification, and designated complaint response procedures, as well as construction of permanent absorptive noise barriers around major stationary noise sources. The Draft EIR also evaluates potential for sleep disturbance and speech interference, referencing the Federal Interagency Committee on Aviation Noise (FICAN) Sleep Disturbance Curve and EPA speech intelligibility criteria. As noted in **Draft EIR Appendix 5.12 BIG-1 Section 6.3**, with windows closed, BIG operations are estimated to awaken approximately three percent of the exposed population, and noise would not be high enough to result in speech interference.

Draft EIR Section 5.1: Aesthetics evaluates BIG's visual and lighting impacts, including the introduction of new sources of light, glare, and visual barriers that could affect the rural character and nighttime sky. The Draft EIR provides visual simulations from key viewpoints and concludes that BIG would substantially degrade the existing visual character and introduce significant new sources of light and glare, resulting in significant and unavoidable impacts, even with implementation of mitigation measures (**MM BIG AES-1,** which requires the preparation and implementation of a Construction Lighting and Screening Plan). See **Draft EIR Impact 5.1-4** (pages 5.1-65 through 5.1-75).

Throughout these sections, the Draft EIR applies CEQA thresholds for air quality (MDAQMD thresholds for criteria pollutants and health risk), noise (City/County standards and Federal Interagency Committee on Aviation Noise (FICAN) incremental increase criteria), and aesthetics, and fully discloses when impacts would remain significant and unavoidable after mitigation. The analysis is supported by technical studies, modeling, and health risk assessments, and the findings are clearly presented for public review and decision-maker consideration. Consistent with CEQA requirements, the Draft EIR describes existing conditions and fully analyzes the BIG's potential impacts, including on the Sylvan Community. Also see **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community, **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses**, Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis**, Consolidated Response 09-05** concerning consideration of the Sylvan Community in the lighting analysis, and **Consolidated Response 09-06** concerning consideration of cumulative impacts to the Sylvan Community**.**

I120-4 In compliance with CEQA requirements, **Draft EIR Section 3.0: Project Description** describes the "whole of the action," that is all of BIG's proposed components and improvements. Review of **Draft EIR Section 3.0** indicates that no changes are proposed for the roads or homes within the Sylvan Community. BIG proposes to widen portions of Main Street, but this would not affect properties or roads within the Sylvan Community. The area west of Prairie Avenue is not proposed for a parking lot or any development and would remain unincorporated and outside the scope of BIG. Projected increases in traffic along Route 66 (Main Street) are less than under the 2015 General Plan, and any increase in traffic west of Country Club Drive is expected to be minimal and primarily limited to employee vehicles, not trucks. There are no

planned entrance points to BIG from Main Street west of Country Club Drive, and no reason for trucks to travel through the Sylvan Community; see **Draft EIR Figure 5.15-2: Access Improvements** (page 5.15-30). Turn lanes and other roadway improvements are addressed in the Draft EIR, with the intent to maintain safe and efficient access for residents.

As stated, in **Draft EIR Section 3.0** page 3-38, the Project does propose a transfer of law enforcement responsibility from the San Bernardino County Sheriff's Department to the Barstow Police Department of approximately 2,686 acres. **Draft EIR Figure 3 14: SBLAFCO Action Area A: City and Odessa Water District Annexation** (page 3-35), **Figure 3 15: SBLAFCO Action Area B: City and Odessa Water District Annexation** (page 3-36), and **Figure 3 16: SBLAFCO Action Area A: Barstow Fire Protection District Annexation** (page 3-37) show the boundaries of the Project's proposed annexation/action areas. Review of these figures shows that the Sylvan Community is not included in the proposed annexations/action areas. Therefore, Sylvan Community residents would continue to be served by the San Bernardino County Sheriff's Department for law enforcement and emergency services. The Barstow Police Department would serve BIG, while BNSF Railroad Police would cover incidents on the trains. BIG is expected to help fund additional police officers for the Barstow Police Department, which may increase police presence in the surrounding communities. Fire protection for the Sylvan Community would be provided by the Barstow Fire Protection District, supported by automatic aid agreements with the County and other agencies. Up to two new fire stations are proposed in closer proximity to the Sylvan Community, which would enhance fire protection services.

While theft is not an environmental topic (see **Consolidated Responses 06-02** concerning the role of social and economic issues under CEQA and **Consolidated Response 06-03** concerning community safety), **Draft EIR Section 5.14: Public Services and Recreation** and **Section 5.9: Hazards, Hazardous Materials, and Wildfire** address property theft, vandalism, and crime associated with BIG (e.g., railroad and solar facilities) construction and operations, as they relate to increase in public service demand (i.e., police protection) (**Draft EIR** pages 5.14-55 through 5.14-56). These sections discuss public safety and security measures, including coordination with local law enforcement agencies and the implementation of site security protocols during construction and operations. As discussed in the Draft EIR (page 5.9-127 and pages 5.14-55 through 5.14-56), the City and BNSF will continue collaboration with the County Sheriff's Department and other agencies to maintain adequate emergency response and crime prevention measures.

I120-5 Water for the Barstow area, including the Sylvan Community, is sourced primarily from pumped groundwater in the Centro Subbasin, which is managed by the Mojave Water Agency (MWA). As discussed in **Draft EIR Section 5.17: Utilities and Service Systems**, the MWA actively monitors groundwater levels and has secured rights to water from the State Water Project to help ensure long-term reliability. Oversight of water quality is provided by the Lahontan Regional Water Quality Control Board (RWQCB), while the County of San Bernardino inspects wells to maintain their integrity and functionality. Also see **Consolidated Response 09-07** concerning consideration of impacts to Sylvan Community private water wells.

The Draft EIR explains that, based on the BIG's water demands, MWA has determined there is sufficient groundwater for both construction and operational phases, and ongoing monitoring of groundwater levels would be provided under existing regulatory programs. If water tables do drop and well depths become problematic, the County's permitting and monitoring requirements are designed to prevent over-extraction, and mitigation or alternative water sources could be required if necessary. The MWA's Well Permitting Ordinance and County Code require permits and annual assessments for new wells, with fees used to purchase water for groundwater recharge; see **Draft EIR Section 5.17.2: Regulatory Setting**. Also see **Consolidated Response 09-07** concerning consideration of impacts to Sylvan Community private water wells.

Water quality is closely regulated and monitored. As discussed in **Draft EIR Section 5.10: Hydrology and Water Quality**, RWQCB ensures that standards are maintained and that any potential contamination, such as increased concentrations of nitrates, perchlorate, or other toxins, is addressed. The Draft EIR analyzes the risk of toxins concentrating in groundwater as a result of Project activities or regional trends and describes capital improvement projects, such as the Replacement Water Supply for Perchlorate/Nitrate Affected Groundwater, which are designed to provide alternative supplies or treatment if contamination is detected; see **Draft EIR Section 5.17: Utilities and Service Systems**. Ongoing monitoring by MWA, RWQCB, and the County helps identify and address any changes in water table levels or water quality, and regulatory agencies will require mitigation and may provide alternative water sources if issues arise. Also see **Consolidated Response 09-04** concerning consideration of the Sylvan Community in the Hydrology and Water Quality analyses and **Consolidated Response 09-07** concerning consideration of impacts to the Sylvan Community private water wells.

In summary, the Draft EIR concludes that with continued regulatory oversight, monitoring, and implementation of mitigation measures, basin-wide water supply sufficiency and water-quality oversight would be maintained. Also see **Consolidated Response 09-04** concerning consideration of the Sylvan Community in the Hydrology and Water Quality analyses and **Consolidated Response 09-07** concerning consideration of impacts to the Sylvan Community private water wells.

I120-6 CEQA requires that an EIR evaluate a project's potential physical impacts on the environment, such as effects on air quality, noise, traffic, and other resource areas. While the Draft EIR for the Project addresses a range of environmental topics, concerns related to property values, real estate market conditions, or economic margins are not considered environmental impacts under CEQA and therefore are not analyzed in the Draft EIR. Similarly, statements regarding City land use policy preferences and the identification of disadvantaged unincorporated communities are noted; however, unless these issues relate to a physical change in the environment, they do not constitute CEQA issues. Also see **Consolidated Response 06-02** concerning the role of social and economic issues under CEQA and **Consolidated Response 06-05** concerning decreased property values.

I120-7 **Draft EIR Section 5.4: Biological Resources** provides a comprehensive analysis of potential impacts to local wildlife and habitats. The Draft EIR identifies and evaluates the presence and potential impacts to a wide range of common and special-status species, including those identified in the comment, and addresses the effects of habitat modification, fragmentation, and ground disturbance. The Draft EIR also discusses the potential for changes in wildlife movement and ecosystem balance, including the possibility of increased human-wildlife interactions, and outlines extensive mitigation measures—such as pre-construction surveys, biological monitoring, habitat preservation, and species-specific avoidance and relocation protocols—to reduce these impacts to less than significant levels. These measures are designed to protect both listed and non-listed species and to maintain ecosystem functions to the extent feasible during and after project implementation. The evaluation of wildlife and habitat impacts was conducted in accordance with CEQA, fulfilling requirements for biological resource assessment and mitigation. As identified in **Draft EIR Impact 5.4-4** (pages 5.4-101 to 5.4-105), with incorporation of **MM BIG BIO-32**, which requires developing a new wildlife crossing in coordination with CDFW, impacts would be less than significant. Also see **Consolidated Response 09-08** concerning biological resources.

I120-8 The Draft EIR does not rely on a generic description of the area as "undeveloped desert" to the exclusion of nearby residents. Rather, "undeveloped desert" is a standard landcover term used in the biological setting and field mapping to describe portions of the footprint that lack urban development, while the Draft EIR separately identifies and evaluates the proximity of existing communities and sensitive receptors at BIG's footprint edge. For example, **Draft EIR Section 5.4: Biological Resources,** defines the study and survey areas, maps vegetation and land cover, and documents field surveys across the footprint and its buffer—reflecting the mixed context of natural habitat adjacent to developed parcels and roadways; see **Draft EIR Section 5.4.3.1** (pages 5.4-11 to 5.4-12) on study area definition, and the tables and figures on **Draft EIR** pages 5.4-28 to 5.4-32 on landcover mapping. In addition, the Draft EIR analyzes wildlife movement and corridor connectivity in relation to existing development and roads, acknowledging constraints and human activity at the edges of the footprint; see **Wildlife Movement** discussion on **Draft EIR** pages 5.4-58 and 5.4-59 and 5.4-101 through 5.4-104. Also see **Consolidated Response 09-08** concerning biological resources.

With respect to health and quality of life considerations for residents near BIG (including the Sylvan Avenue community), the Draft EIR applies receptor-based methodologies in topical analyses (e.g., air quality, noise, and transportation), rather than relying on landcover labels. Transportation modeling informs related technical studies and mitigation, including requirements for traffic control plans during construction to also maintain access and reduce disruptions for the public and emergency services (**Draft EIR** page 5.15-25 on model outputs supporting Air Quality/Noise and **Draft EIR** page 5.15-57 on construction Traffic Control Plans). Taken together, these sections and the associated mitigation measures are intended to disclose and reduce BIG's potential impacts to residents adjacent to BIG, and the use of "undeveloped desert" in the biological setting does not minimize or obscure those analyses.

The Draft EIR's use of "undeveloped desert" as a land cover term does not diminish the analysis of impacts to nearby residents or sensitive receptors. The evaluation of biological resources, land use context, and health and quality of life considerations for adjacent communities was conducted in accordance with CEQA, with receptor-based methodologies and technical studies applied throughout the document. This approach provides a transparent and thorough assessment of both environmental and community impacts, ensuring that the proximity and needs of existing residents are fully addressed in the environmental review process. Also see **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor, **Consolidated Response 06-01** concerning the geographic scope of the environmental analysis and definition of study area**,** **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses, **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis, **Consolidated Response 09-08** concerning consideration of Sylvan Community biological resources, **Consolidated Response 06-03** concerning community safety**, Consolidated Response 06-02** concerning the role of social and economic issues under CEQA, and **Consolidated Response 06-04** concerning quality of life.**-**

I120-9 See **Consolidated Response 06** concerning potential effects on communities; **Consolidated Response 06-03** concerning community safety; **Consolidated Response 06-04** concerning quality of life; **Consolidated Response 04** concerning the role of social and economic issues under CEQA, **Consolidated Response 06-05** concerning decreased property values; and **Consolidated Response 02** concerning significant and unavoidable impacts and the Statement of Overriding Considerations. The City recognizes that there is a great deal of information to be considered for a project of BIG's scale and complexity. This is one reason there were various outreach meetings and on-line information provided prior to the issuance of the Draft EIR; see **Consolidated Response 01** concerning community outreach and the Draft EIR public review period. The Project (proposed General Plan and BIG) addressed in the Draft EIR, if implemented, would result in changes to the City of Barstow that would be long term and permanent. The Draft EIR is only one piece of information provided to the decision makers for consideration. The public will be given an opportunity to comment and ask additional questions during the public hearings that will be held before both the Barstow Planning Commission and the City Council before action is taken on the Project. City Staff will summarize the actions needed in a staff report and provide a presentation regarding the proposed Project and potential impacts, including those that cannot be reduced to a less than significant level. The intent of these summaries and highlights is to help in understanding all of the Project components.

I120-10 See **Responses I120-1** through **I120-9**.

RESPONSES TO SILVER LAKES/HELENDALE COMMUNITY FORM LETTER

The comment letters listed in the table below are concerning the Silver Lakes/Helendale Community. As the letters raised the same issues, a single response to the comments has been provided. In the table below, the letter number is followed by the commenter's name. In instances where the name was not legible or missing, the commenter's name is included as "Public Comment." The letters listed in the table below can all be found posted on the City's website at: https://www.barstowca.org/departments/community-development-department/planning/general-plan-update. As these comment letters repeatedly utilized a similar letter that raised the same issues, the responses applicable to all these comment letters have been provided in the first of these letters, I121, Linda Allen Macy, in the following pages.

I121	Linda Allen-Macy
I123	Gain Guinn
I124	Daniel Guinn
I125	Mike and Joan Ohren
I127	Sara Woods
I128	Kevin Woods
I213	Michelle Augustine
I214	Patricia Arringdale
I215	Amelia Zappa
I216	Public Commenter 184
I217	Public Commenter 185
I218	Sandra Sanders
I219	Craig Sanders
I220	Rusty Mace
I221	Joy Bori
I222	Cheri Bori
I223	Paul Tracy
I224	Susan Tracy
I225	Rebecca Nelson
I226	Barbara R
I228	Mary Louis Dennis
I229	Carol Easly
I230	Kyung Yoon
I231	Greg Thomson
I232	Kenneth Cross
I417	F.E. Puglisi
I418	Wanda Snyder
I419	Jose Demelo
I420	Amanda Lang
I421	Public Commenter 217
I422	Sherrill Hoepner
I423	Linda Perkins
I424	Laura Trocha
I425	Amador Perea Jr
I427	Carl Euersole
I428	Hun Han
I429	Kyung Han
I430	Billy Conner
I431	Robert Goodman
I432	Janet Elledge
I433	Rosultha Lada
I434	Public Commenter 218
I435	Joan Villoni
I436	Diane Peterson
I437	Andrea Myers
I438	Lynne Diamond
I439	Joseph Garza
I440	Virginia Garza
I441	Lineta Phillips
I442	William Atkinson Jr
I1587	Jean Carlo
I1588	Public Commenter 385
I1589	Jesse
I1590	Public Commenter 386
I1591	Public Commenter 387
I1592	Faine Rogers
I1593	Hansin Rogers
I1594	Julian Sisneros
I1595	Public Commenter 388
I1596	Public Commenter 389
I1597	Evangeline
I1598	Public Commenter 390
I1599	Isaik Costa
I1600	Public Commenter 391
I1602	Public Commenter 393
I1603	Public Commenter 394
I1604	Public Commenter 395
I1605	Public Commenter 396
I1606	Public Commenter 397
I1607	Public Commenter 398
I1608	Public Commenter 399
I1610	Lucy Predeson
I1611	Public Commenter 400
I1612	Public Commenter 401
I1613	Public Commenter 402

I233 Sheila Reyes
I234 Tammy Kim
I235 Jay Kim
I253 Caleb Carmichael
I254 Public Commenter 190
I257 Public Commenter 191
I259 Michael and Joan Ohren
I260 Public Commenter 192
I261 Simone M Cross
I262 Public Commenter 193
I265 Christine Ladd
I266 Dustin Ladd
I269 Haroutioun & Rebecca Markarian
I272 Public Commenter 195
I273 David Hart
I277 Jason Hart
I278 David Johnston
I279 Tomoko Johnston
I280 Patricia Thursby
I281 Theodore Thursby
I284 Robert Kneer
I286 Sandra Weiss
I288 Public Commenter 198
I289 John Gibson
I290 Carol Crumrine
I292 Ellen Johnson
I293 Jill Campbell
I294 Public Commenter 199
I325 Bonnie Viola
I327 Holly Flores
I329 James Janke
I342 Ray Redmon
I344 Pamela Olsen
I345 Daniel Olsen
I443 Barbara Wood
I444 Bonnie Xiolo
I445 Michael Burke
I446 Ron Clark
I447 Holly Flores
I448 Francis Corrie
I449 James Tucker
I450 Victoria Lucas
I451 John Lucas
I452 Karen Burke
I453 Joyce Burke
I454 Torell Smarr
I455 Robert Cushman
I456 Thomas Daily
I457 Carolyn Talmage
I458 Public Commenter 219
I459 Amy Thomas
I460 Debbie Froelich
I1143 Michele Augustine
I1148 Georgia Ritchie
I1149 William Ritchie
I1150 June Fuller
I1151 Gary Fuller
I1152 Kristen Gonzales
I1153 Carmelita Lape
I1154 Kirk VanEpps
I1155 Anne VanEpps
I1156 Sandra Deutsch
I1157 Barbara Engelhardt
I1158 Sandra Spinelli
I1159 Nancy Souza
I1160 Kenneth S
I1162 Gary Cook
I1163 Public Commenter 227
I1614 Public Commenter 403
I1615 Public Commenter 404
I1616 Estella Zamora
I1617 Zoriah Robinson
I1618 Public Commenter 405
I1619 Stephen Hinojosa
I1620 Public Commenter 406
I1621 Jacob Almaraz
I1622 Public Commenter 407
I1623 Mckenzie Deacon
I1624 Christian Solano
I1625 Public Commenter 408
I1626 Ariana Fa
I1627 Elizabeth Wilson
I1628 R Kasey Sinclair
I1629 Rosa Morelos
I1630 Eileen Ellescas
I1631 Andrew Perez
I1633 Public Commenter 409
I1634 Rylah Lythe
I1635 Jeremy Rey
I1636 Eale Ferguson
I1637 Jeanine Carasco
I1638 Vincent Atkinson
I1639 David Ross
I1640 China Butler
I1641 Camila Martinez
I1642 Erin Rodger
I1643 Rachel T
I1644 Olivia Roberts
I1646 Public Commenter 410
I1647 Evan
I1648 Adam
I1649 Cole Noble

I346	Silvia Lemus
I347	Emilio Lemus
I348	Donna Halmark
I349	Colleen Haro
I350	Laurette Wellinger
I351	Janet Green
I353	Christine Ladd
I354	Christina Santia
I355	Corine Santia
I356	Colette Sands
I357	Lynne Hulsebos
I358	Katherine Condon
I359	Merrilee Leggit
I361	Rolando Garcia
I362	Beth Yaegle
I363	Linda Verhoeven
I364	Charles Blevins
I365	Shanon Blevins
I366	Jamie Jesse Shedden
I367	Jesse Hudson
I370	Lee Yaegle
I371	Jasmine Hudson
I374	Elda McGrane
I377	Michele Augustine
I378	Nancy Carnes
I379	Jorge Peiro
I380	Ronald Kauffman
I381	Martin Oschner
I382	Mike McAbee
I384	Cherry Peck
I385	George Ryan
I386	Rose Mary Ryan
I387	James Kain
I388	Charles Muir
I1165	Mary Lou Armstrong
I1166	Chantal Limoli
I1167	John Limoni
I1168	Linda Allen-Macy
I1171	Rebekah Brasee
I1180	Public Commenter 228
I1181	Dorothy England
I1242	Margaret Ashford
I1246	Public Commenter 230
I1247	Public Commenter 231
I1294	Kristine Cerone
I1296	Marlene Sears
I1297	Robert Sears
I1303	Ace Herrera
I1304	Diane Herrera
I1546	Public Commenter 368
I1547	Public Commenter 369
I1548	Victoria S
I1549	David Walshe
I1550	Landin Satton
I1551	Ezekiel
I1552	Public Commenter 370
I1553	Public Commenter 371
I1554	Vicente Trevizo
I1555	Public Commenter 372
I1556	James H
I1561	Jullisa Jordan
I1562	Luis Espiritu
I1563	Vincent
I1564	Jovanni
I1565	Lauren Carlson
I1566	Aspen Dorchig
I1567	Public Commenter 373
I1568	Public Commenter 374
I1650	Public Commenter 411
I1651	James
I1652	Angel Salgado
I1653	Public Commenter 412
I1654	Public Commenter 413
I1655	Kobe Cody
I1656	Abigail Blake
I1657	Kaleb Speed
I1658	Colton Risenoover
I1659	Public Commenter 414
I1660	Natalie Mata
I1661	Public Commenter 415
I1662	Reyne Rogers
I1663	Maritza Velasquez
I1664	Stephanie Minhas
I1665	Public Commenter 416
I1666	Public Commenter 417
I1667	Public Commenter 418
I1668	Public Commenter 419
I1669	Kiara Mann
I1670	Public Commenter 420
I1671	Public Commenter 421
I1701	Fran Diggs
I1702	Wayne White
I1703	Ashley Woods
I1704	Public Commenter 424
I1705	Jose Quinones Perez
I1706	Judi H
I1707	Robert Dasheil
I1708	Public Commenter 425
I1709	Brenda Flores
I1710	Elaine Polder
I1711	Desi McCase
I1712	Fran Diggs

I389	Diane Muir
I390	Louis Edwards
I391	Donna Edwards
I392	Harley Edwards
I393	David Edwards
I394	Andrea Aviles
I395	Heather Elery
I396	Kathy Ree
I397	James Mullen
I399	Steven Garcia
I401	William Mabon
I403	Vincent Chavez
I408	Monty Davis
I411	Rick Luginbill
I413	Leonard Golaski
I414	Nancy Golaski
I415	GL Puglisi
I416	S Puglisi
I1569	Ave Riech
I1570	Public Commenter 375
I1571	Caelydiou Espinoza
I1572	Public Commenter 376
I1573	Public Commenter 377
I1574	Public Commenter 378
I1575	Public Commenter 379
I1576	Public Commenter 380
I1577	Public Commenter 381
I1578	Carter Mag
I1579	Cole Thacker
I1580	Public Commenter 382
I1581	Daniel Manrique
I1582	Ryder M
I1583	Public Commenter 383
I1584	Public Commenter 384
I1585	Linnea Longnecker
I1586	Sarah Foor
I1716	Frank Kennel
I1720	Public Commenter 428
I1721	Lori DeRome
I1722	Jean Hoga
I1723	Clifford Grojton
I1724	Maria Casanta
I1727	Scott Cleveland
I1728	Becki Kelvington
I1729	Dion Diggs
I1730	Paul Polder
I1731	Cheryl Peck
I1732	Joanne Alworth
I1733	Doran Kelvington
I1734	Gary McCabe
I1736	Desma Sharp
I1737	Rich and Sharon Jewett
I1992	Michael Ward
I1993	Claudia Sharp
I1995	Michelle Kooiman
I1996	Patricia Sparks

COMMENT LETTER I21

I121

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I121-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I121-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I121-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I121-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I121-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I121-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I121-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I121-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I121-8

Sincerely,

Signature: Linda Ellen Mack (You can remain anonymous if you prefer.)
Print Name:
Mailing Address:
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

RESPONSE TO COMMENT LETTER I121, LINDA ALLEN MACY

I121-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/ Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings accessibility, and **Consolidated Response 06-04** concerning quality of life.

I121-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I121-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/ Helendale Community.

I121-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I121-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I121-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/ Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I121-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade

separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at the Silver Lakes/Helendale Community at-grade crossings.

I121-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/ Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

COMMENT LETTER I122

I122

BNSF /extension for ?'s

angels4mel@aol.com

Sun 12/7/2025 10:31 AM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

[NOTICE: THIS IS AN EXTERNAL EMAIL]
Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!

Caution! This message was sent from outside your organization.

I totally agree with Sherry Bailey on the extension for questions and concerns. Now as as enter & exit Sylvan I can't imagine what is planned for our future. What I wonder is , would you all be agreeing with these plans if your mother, grandmother, your children lived in our Community. I think not!!!
This will totally change our lives and not necessarily in a good way! Think about it please!!

Carmela Gonzalez

Sent from the all new AOL app for iOS

I122-1

RESPONSES TO COMMENT LETTER I122, CARMELA GONZALEZ

I122-1 See **Consolidated Response 04** concerning general non-CEQA issues and **Consolidated Response 01-02** concerning the Draft EIR public review period.

COMMENT LETTER I129

I129

BiG Project

Mart Family <deemart43@yahoo.com>

Mon 12/8/2025 5:18 PM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

[NOTICE: THIS IS AN EXTERNAL EMAIL]
Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!

Caution! This message was sent from outside your organization.

In regards to air and noise pollution; and, environmental concerns:

How many Diesel trucks will be on the roads in the Lenwood Rd./Main St./Country Club Dr./Sylvan Ave area during the construction period? I219-1

How many Diesel trucks will be on the roads in the Lenwood Rd./Main St./Country Club Dr./Sylvan Av. area after BIG is fully operational? I219-2

Not all freight will come in on rail once BIG is operational. How much hazardous material will be transported by trucks? I219-3

How much hazardous material is going to be transported by rail into the BIG area once it's fully operational? I219-4

How many trains will be bringing containers in on a daily basis once BIG is operational? I219-5

The above questions need to be answered. The desert wildlife & people of Sylvan Av. & Country Club Dr. are going to be significantly and negatively impacted by this project. I219-6

Yahoo Mail: Search, Organize, Conquer

RESPONSES TO COMMENT LETTER I129, MART FAMILY

I129-1 BIG's construction phase traffic generation is discussed in the **Draft EIR Appendix 5.15 BIG-1: CEQA Assessment – Transportation Analysis, Section 8.2**. As illustrated in **Draft EIR Appendix 5.15 BIG-1 Figure 36: Number of Construction Truck Trips per Day by Month** (page 149), BIG's construction is forecast to generate up to 1,732 heavy-duty truck trips per day (866 heavy-duty trucks per day, with one trip to the site and one trip departing the site). On average, BIG's construction is forecast to generate about 860 heavy-duty truck trips per day (430 heavy-duty trucks per day) over 33 months. Most (up to all) of the construction trucks will be diesel. The trucks would mostly access the BIG construction site from Lenwood Road and Main Street. A small number of trucks will use Country Club Drive south of Main Street for the proposed improvements south of Main Street. No trucks are forecast to use Sylvan Avenue.

I129-2 BIG's trip generation (i.e., trucks and employees) is discussed in **Draft EIR Appendix 5.15 BIG-2: Level of Service Assessment – Transportation Analysis** beginning on page 131; see **Draft EIR Appendix 5.15 BIG-2 Table 28: BIG Trip Generation – Opening Year 2028 Total** (page 132), **Table 29: BIG Trip Generation – Interim Year 2033 Total** (page 132), and **Table 30: BIG Trip Generation – Horizon Year 2048 Total** (page 133). As indicated in these tables, BIG operations are forecast to generate approximately 594 daily heavy-duty truck trips in Opening Year 2028, approximately 753 daily heavy-duty truck trips in Interim Year 2033, and approximately 929 daily heavy-duty truck trips in Horizon Year 2048. Most of the trucks will be diesel. About one-third of trucks will access BIG using Lenwood Road (to the transload warehouse center) and two-thirds of trucks will access BIG using Main Street (to the rail yard). BIG does not propose any truck trips on Country Club Drive south of Main Street or Sylvan Avenue.

BIG would substantially reduce heavy-duty truck travel nationwide by shifting freight movement from trucks to trains, cutting hundreds of millions of truck miles annually, in furtherance of local, regional, and State transportation plans and policies. As discussed on **Draft EIR** page 5.15-76 and summarized in **Draft EIR Table 5.15-20: BIG Truck Miles Traveled Summary** (page 5.15-77), BIG would decrease heavy-duty truck miles traveled (TMT) nationwide by hundreds of millions of miles per year, with an estimated annual reduction of 333 million heavy-duty TMT in 2048. See also **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings and **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings.

I129-3 Because BNSF operates as a common carrier and transports commodities based on customer demand, the specific quantities and types of hazardous materials that may be transported cannot be determined in advance. However, the rules governing any hazardous materials that would be transported are discussed in **Draft EIR Impact 5.9-1** (pages 5.9-99 through 5.9-106) and in **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans. As discussed on **Draft EIR** page 5.9-102, BIG

operations could also include transport of hazardous materials and waste to/from BIG via traditional heavy-duty truck. Hazardous materials and waste being transported to/from BIG via traditional heavy-duty trucks would comply with all federal, State, and local laws and regulations regarding the safe transport of hazardous materials and waste, which would be effective in preventing a hazard to the public. Further, BIG includes safe haven canopies where damaged, leaking, or shifted containers or trailers would be placed to contain spills until they are loaded into an alternative container or trailer, or resecured, as necessary. Through compliance with federal and State laws and regulations regarding the safe transport of hazardous materials and waste and design elements, BIG would not create a significant hazard to the public or the environment through the routine transport of hazardous materials by heavy-duty truck.

I129-4 As BNSF is a common carrier (transporting goods based on the needs of their customers), it is unknown how many hazardous materials would be transported. However, the rules governing any hazardous materials that would be transported are discussed in **Draft EIR Impact 5.9-1** (pages 5.9-99 through 5.9-106) and in **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans. As discussed on **Draft EIR** pages 5.9-101 and 5.9-102, within the lead tracks and rail yard, BIG operations would involve transport of hazardous materials and waste to/from BIG, almost entirely via rail. However, BIG's routine transport of hazardous materials and waste via rail would be regulated by numerous federal, State, and local regulations. BIG includes safe haven canopies, which are designated facilities where damaged, leaking, or shifted containers or trailers would be placed to contain spills until they are loaded into an alternative container or trailer, or resecured, as necessary. Through compliance with federal, State, and local laws and regulations regarding the safe transport of hazardous materials and waste and design elements, BIG would not create a significant hazard to the public or the environment through the routine transport of hazardous materials by train.

I129-5 As discussed on **Draft EIR** page 3-53, BIG's intermodal facility would, through the mode shift from truck to train via the cross-dock intermodal operation, add a new volume to the BNSF network, totaling approximately 3.2 trains per day on average in 2028, approximately 4.3 trains per day on average in 2033, and approximately 4.9 trains per day on average in 2048. These train counts include eastbound and westbound trains.

I129-6 See **Responses I129-2** through **I129-5** concerning the commenter's questions. See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community.

RESPONSES TO GROUP SUPPORT LETTER 2

The comment letters listed in the table below are letters of support received by the City. As the letters raised the same issues, a single response to the comments has been provided. In the table below, the letter number is followed by the commenter's name. In instances where the name was not legible or missing, the commenter's name is included as "Public Comment." The letters listed in the table below can all be found posted on the City's website at: https://www.barstowca.org/departments/community-development-department/planning/general-plan-update. As these comment letters repeatedly utilized a similar letter that raised the same issues, the responses applicable to all these comment letters have been provided in the first of these letters (i.e., Letter I184, Leadora Escobosa) in the following pages.

I184	Leadora Escobosa, December 8, 2025	I200	Public Commenter 179	I252	Public Commentor 189
I185	Chris Escobosa, December 8, 2025	I201	Public Commenter 180,	I1241	Julie Fuentes
I186	Public Commenter 171,	I208	Public Commenter 183	I1316	Paul Negrette
I187	Public Commenter 172	I237	Janette Courtney	I1739	Dorothy Krelovich
I191	Public Commenter 173	I238	Jenneca P.	I1764	Sharon Hodge
I192	Public Commenter 174	I248	Public Commenter 187	I1891	EVC Partners
I199	Public Commenter 178	I251	Public Commentor 188		

COMMENT LETTER I184

I184

Date:

As a proud resident of Barstow, I write to express my strong support for the Barstow International Gateway (BIG) project, the proposed $4 billion master-planned rail facility. BNSF has been an important part of Barstow's history for more than 135 years and this project underscores the company's commitment to Barstow's future. I184-1

BIG is exactly the kind of private investment that we need, to help our city and the High Desert thrive, by providing jobs, opportunity and economic vitality. I184-2

In fact, the recently released Draft Environmental Impact Report (EIR) states that over 20 years, BIG would create approximately 62,000 direct, indirect and induced construction jobs, including union construction jobs and approximately 15,000 direct, indirect, and induced operation jobs. In addition, the construction economic benefit is approximately $11 billion and operational economic benefit is approximately $7 billion. I184-3

BIG would also provide economic stimulus and revitalization to the City through higher paying jobs, expansion of local skills training, and improved public services, including fire, police and utility infrastructure. I184-4

In addition, BIG includes several substantial public improvements: I184-5

- Widening Lenwood Channel by between 60 and 100 feet for more than two miles, substantially reducing existing flooding hazards.
- Replacing the existing Main Street low-water crossing over Lenwood Channel with a new four-lane bridge which would be designed for 100-year flood events.
- Replacing the existing Hinkley Road bridge over the Mojave River with a longer bridge to better match the channel width of the Mojave River at that location, reducing flooding compared to existing conditions.
- Expanding Golden State Water Company infrastructure to the western extent of the City, enabling nearby residents to connect to Golden State Water Company water lines.

As the Hub of the West, Barstow deserves the investment and benefits that BIG will provide to our city. I184-6

I encourage the City of Barstow to finalize the EIR and approve the project, so that it can be built and start operations as soon as possible. I184-7

Sincerely,

LeaDora Marie Escobosa

760-221-8459

RESPONSE TO COMMENT LETTER I184, LEADORA ESCOBOSA

I184-1 through I184-7 See **Consolidated Response 04** concerning non-CEQA issues.

COMMENT LETTER I227

I227

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I227-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I227-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I227-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I227-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I227-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I227-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I227-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I227-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I227-8

Sincerely,

Signature: Theresa Salerno (You can remain anonymous if you prefer.)
Print Name: Theresa SALERNO
Mailing Address: P.O. Box 3705
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

We Need to be able to access our exit in & out of Silver Lakes 24/7 I227-9

RESPONSE TO COMMENT LETTER I227, THERESA SALERNO

I227-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 06-04** concerning quality of life.

I227-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning Lakes/ Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I227-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/ Helendale Community.

I227-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I227-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I227-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/ Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I227-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale

Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings.

I227-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/ Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I227-9 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community; and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings.

COMMENT LETTER I255

I255

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Received
DEC 11 2025
City of Barstow

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I255-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I255-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I255-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I255-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I255-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I255-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I255-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I255-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I255-8

Sincerely,

Tom Winchel

Signature: Tom Winchel (You can remain anonymous if you prefer.)
Print Name: ~~14295 Jib Ct.~~ P.O. Box 371
Mailing Address:
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

We need an overpass built to save lives!. I255-9

RESPONSE TO COMMENT LETTER I255, TOM WINCHEL

I255-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 06-04** concerning quality of life.

I255-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I255-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/ Helendale Community.

I255-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I255-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I255-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/ Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I255-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale

Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings.

I255-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I255-9 See **Consolidated Response 05** concerning feasible and enforceable mitigation; **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; and **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at the Silver Lakes/Helendale Community at-grade crossings.

COMMENT LETTER I256

I256

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

Received
DEC 11 2025
City of Barstow

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I256-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I256-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I256-3

- **Emergency Access:** Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I256-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I256-5
- **Cumulative Impacts:** Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I256-6
- **Mitigation Commitment:** Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I256-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I256-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I256-8

Sincerely,

Judy Knutson

Signature: Judy Knutson (You can remain anonymous if you prefer.)
Print Name: P.O. Box 371
Mailing Address:
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

I am 79 yrs. old & I live alone. I have to depend on friends a lot & some family from other areas. It's hard for anyone to come into Silver Lakes any other way except from Hwy 66 and Vista road to give me assistance. My Drs. are in Apple Valley so I need the shortest route to and from as well. There are a lot of children here in Silver Lakes as well that go to school in Oro Grande and take a bus, closing Vista Rd. is a life threatening move for all of us. I see a lot of law suites in the future if our main road is closed off. I256-9

Please help keep us all safer!

Thank-You
Judy Knutson

RESPONSE TO COMMENT LETTER I256, JUDY KNUTSON

I256-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 06-04** concerning quality of life.

I256-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I256-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I256-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I256-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I256-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I256-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale

Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings.

I256-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/ Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I256-9 BIG does not propose to remove access to the Silver Lakes/Helendale Community via Vista Road. For additional information, see **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 06-03** concerning community safety; **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings; **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings.

COMMENT LETTER I258

I258

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

Received
DEC 1 1 2025
City of Barstow

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I258-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I258-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I258-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I258-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I258-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I258-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I258-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I258-7 cont.

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I258-8

Sincerely,

Signature: _____ (You can remain anonymous if you prefer.)
Print Name: DAVID SCHNAYERSON
Mailing Address: POB 1051 - 14410 Helm Ct,
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked. MEDICAL EMERGENCY I258-9

RESPONSE TO COMMENT LETTER I258, DAVID SCHNAYERSON

I258-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 06-04** concerning quality of life.

I258-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I258-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I258-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I258-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I258-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I258-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale

Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings.

I258-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I258-9 See **Consolidated Response 06-03** concerning community safety; **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community; **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings; **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings.

COMMENT LETTER I263

I263

OPPOSE BNSF BIG PROJECT

Mart Family <deemart43@yahoo.com>

Fri 12/12/2025 1:14 AM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

[NOTICE: THIS IS AN EXTERNAL EMAIL]
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December 12, 2025

Dear Mayor Silva and City Council Members,

This letter is to express serious concerns regarding the **negative** and **significant** impacts that are listed in the Draft Environmental Impact Report regarding the proposed Barstow International Gateway Project. There are **negative** and **significant** impacts listed in this massive report that will personally affect our family and community. Mitigation measures would not resolve or lessen many of these impacts. It is impossible to dissect the colossal DEIR within a 45-day review period and list every negative and significant impact in this letter. Therefore, we are requesting a minimum extension of an additional 45-day review period. I263-1

Our rural community is across from BNSF's proposed BIG Project. This area is part of unincorporated San Bernardino County which is where most of the BIG footprint is located. Our family moved to the Country Club Dr./Sylvan Av. area approximately 20 years ago. We moved to this small, close-knit community for a quiet, peaceful lifestyle. I263-2

The proposed BIG Project will be enormous with an approximate 4,500+ acre integrated rail hub. The full magnitude of this project and the **negative** impact it will have on us, our community, and environment is yet to be seen. BNSF is navigating uncharted territory with the Country's largest intermodal railyard. As residents that will be directly affected by this project, we are asking you to look beyond dollar signs, to do your due diligence in researching the **adverse effects** of an intermodal yard.

Intermodal yards **negatively** impact communities and cause **serious health issues** through significant air and noise pollution. This leads to respiratory issues such as asthma, allergies, cancer and other physical and mental health issues. Constant noise and/or vibrations can lead to stress, fatigue, nausea and sleep deprivation. This can elevate stress hormones and potentially affect cardiovascular health. Vibrations can cause cosmetic damage to homes and potentially cause structural damage to foundations. Intermodal yard operations can lower the water table and deplete private and community wells. These railyards can cause groundwater contamination through spills, improper waste disposal, etc. These yards also bring increased crime, theft, and have a **negative** impact on quality of life. Residential properties often experience a decrease in value due to **negative environmental** factors. Who is going to want to live near a facility such as the BNSF intermodal yard? Do you? I263-3

The proposed BNSF BIG Project will forever change our beautiful, serene desert landscape into an undesirable industrial desert. We will be subjected to a 24/7, 365 days of non-stop noise and light pollution. Construction and daily railyard operations will **negatively** affect air quality. There will be dust and air pollution. Is BNSF going to fit our homes with filtration systems, new windows, and soundproof the walls in our homes? There will obviously be increased traffic due to construction as well as round the clock daily operations of an intermodal yard. There I263-4

will be an increase in accidents. Emergency vehicles will likely be delayed. Those traveling to work via Route 66/Main St. may experience congestion. Crime will only escalate! BNSF has their own officers. The City of Barstow is getting additional officers. How many additional Sheriffs will be assigned to our area in San Bernardino County? I263-4 cont.

BNSF is planning to place up to eight new private wells on site for temporary groundwater wells that will be used for construction. Approximately 90% of the non-potable water will be needed in the first 12-15 months of this project. WSA concluded that based on current available information, there is sufficient water supply available. Is this with current conditions, as conditions are subject to change. Is this a guarantee that our private and community wells won't be depleted by this project, leaving us without water? Who will oversee to ensure proper measures are being taken by BNSF should ground water contamination occur; or, if any other adverse situation arises? Our desert ecosystem will be disrupted, affecting desert wildlife to include the desert tortoise. Uprooting the wildlife will cause pest control issues within our community. I263-5

Mayor Silva and City Council Members, we are genuinely concerned about the **significant and negative impacts** the proposed BIG Project will have on our health and our homes. The actions/operations of BNSF should ALWAYS be measurable and enforceable. There MUST be accountability when it comes to our health, homes, and lives. We implore you (and the public) to truly study the Draft Environmental Impact Report to understand the **significant and negative** impacts that the BIG Project will have on us. We are your neighbors, friends, colleagues and in some cases maybe family. **Our lives, our home, our health matter!** Barstow is known for being the "little city with a big heart." Now is the time to prove it. Stand up with us. Help protect us. Advocate with us. Our quality of life is literally in your hands. What price is the City of Barstow willing to pay for growth and revenue? Please, DO NOT allow us to become a **casualty** of this proposed project! I263-6

In closing, this project is already causing some of us a great deal of distress and anxiety. BNSF hasn't been receptive to proposed mitigation suggestions made community members. It is our understanding that the City of Barstow can approve the BIG Project despite the **significant and negative impacts** it will have on us, the Sylvan Av. community, our neighboring communities on Country Club Dr. and Silver Lakes. PLEASE take your time, use discernment before making a decision. Understand the magnitude of your decision. Lives depend upon it. I263-7

Respectfully,
DM & RM, Sylvan Av. Community, Barstow, CA

RESPONSES TO COMMENT LETTER I263, MART FAMILY

I263-1 The Draft EIR found that BIG would result in significant and unavoidable impacts as noted in this Comment and summarized in **Draft EIR Section 8.5: Significant and Unavoidable Impacts** (**Draft EIR** page 8-18). See **Consolidated Response 02** concerning significant and unavoidable impacts and the Statement of Overriding Considerations, and **Consolidated Response 01** concerning community outreach and the Draft EIR public review period.

I263-2 See **Consolidated Response-02** concerning significant and unavoidable impacts and the Statement of Overriding Considerations and **Consolidated Response 04** concerning general non-CEQA issues.

I263-3 For the issues raised in this comment, see **Consolidated Response 02** concerning significant and unavoidable impacts and the Statement of Overriding Considerations and the following responses:

- Air quality and health issues: see **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis, and **Consolidated Response 06-04** concerning quality of life.
- Noise and vibration: see **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses, and **Consolidated Response 06-04** concerning quality of life.
- Private water wells: see **Consolidated Response 09-07** concerning consideration of impacts to Sylvan Community private water wells and **Consolidated Response 09-04** concerning consideration of the Sylvan Community in the Hydrology and Water Quality analyses.
- Groundwater contamination: see **Consolidated Response 09-04** concerning consideration of the Sylvan Community in the Hydrology and Water Quality analyses, **Consolidated Response 09-07** concerning consideration of impacts to Sylvan Community private water wells, and **Consolidated Response 09-10** concerning consideration of the Sylvan Community in the Hazardous Materials analysis, including arsenic levels/mobilization.
- Crime and theft: see **Consolidated Response 04** concerning general non-CEQA issues and **Consolidated Response 06-03** concerning community safety.
- Quality of life: see **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community, and **Consolidated Response 06-04** concerning quality of life.
- Decreased property values: see **Consolidated Response 06-02** concerning the role of social and economic issues under CEQA and **Consolidated Response 06-05** concerning decreased property values.

I263-4 For the issues raised in this comment, see the following responses:

- Changes in visual character: see **Response I1676-3**.
- Noise: see **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses.
- Lighting: see **Consolidated Response 09-05** concerning consideration of the Sylvan Community in the lighting analysis.
- Construction and operational air quality: see **Response I1677-40**.
- Air quality (filtration systems and windows): see **Response I1677-28.**
- Noise (windows, soundproof walls, and noise barriers): see **Response I1684-11.**
- Increased traffic: see **Response I1684-11**.
- Increase in accidents: see **Response S3-2.**
- Emergency access: see **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings**, Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.
- Emergency response: see **Consolidated Response 06-03** concerning community safety and **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings.
- Traffic congestion/delay: see **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings**.**
- Crime: see **Responses I120-4**, and **I1890-1** through **I1890-3**.
- Police protection: see **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings. No additional facilities or staffing would be required to meet BIG's demand for police protection within the City. BIG's off-site rail and non-rail improvement areas not already in the City or that would be annexed to the City would remain within County jurisdiction, which would be within San Bernardino County (SBC) Sheriff's responsibility (**Draft EIR** page 5.14-54). As concluded on **Draft EIR** page 5.14-57, BIG off-site improvement areas remaining within the County would be required to comply with the most current SBC Sheriff Fee Schedule, which require a fee payment for any developments requiring permitting that the County then applies to the funding of police protection facilities. Compliance with the SBC Sheriff service fees would be required prior to BIG's construction.

I263-5 State CEQA Guidelines § 15126.2 specifies that an EIR shall identify and focus on the significant effects of the proposed project on the environment. In assessing the impact of a proposed project on the environment, the lead agency should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the

Notice of Preparation (NOP) is published. **Draft EIR Section 5.17: Utilities and Service Systems** discusses BIG's potential impacts to groundwater supplies. The NOP for the EIR was published February 24, 2024, and thus **Draft EIR Section 5.17's** analysis is based on the existing physical conditions at the time of the NOP release. Notwithstanding, as concluded in **Consolidated Response 09-07** concerning consideration of impacts to Sylvan Community private water wells, well water pumping to meet BIG's construction non-potable water demands would be subject to the Water Master and adjudicated water basin Judgment's[2] pumping limitations. The Mojave Water Agency (MWA) is the acting Watermaster to ensure that the terms of the Judgement are followed by all Stipulating Parties. Therefore, BIG's construction non-potable water demand would not result in lowered water levels at nearby wells, including Sylvan Community private wells.

See **Consolidated Response 09-07** concerning consideration of impacts to Sylvan Community private water wells. Additionally, BIG's 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 is addressed under **Draft EIR Impact 5.9-2** (beginning page 5.9-106). Furthermore, BIG would incorporate **MM BIG HAZ-3**, which requires sampling, cleaning, permitting, and handling of potential on-site hazardous materials storage if USTs are discovered during construction. Additionally, **MM BIG HAZ-3** requires stop work within a 30foot radius of the UST. As concluded on **Draft EIR** page 5.9-113, through compliance with the established regulatory framework and incorporation of **MM BIG HAZ-3**, BIG construction would not 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. As concluded on **Draft EIR** page 5.9-119, in summary, BIG's operations would not create a potentially significant hazard to the public or the environment through reasonably foreseeable upset and accidental conditions involving the release of hazardous materials into the environment (**Draft EIR Impact 5.9-2**, pages 5.9-108 through 5.9-120), and impacts would be less than significant with mitigation incorporated (i.e., **MM BIG AQ-1, MM BIG HAZ-1**, **MM BIG HAZ-2, MM BIG HAZ-3,** and **MM BIG HAZ-4**). **MM BIG AQ-1** requires daily watering of exposed soil and roads to further prevent the release of fugitive dust containing arsenic during construction; **MM BIG HAZ-1** requires management and handling of impacted soil, would involve transporting hazardous waste to appropriate off-site disposal facilities; **MM BIG HAZ-2** requires adherence to State RWQCB and regional Certified Unified Program Agency (CUPA) guidelines for well abandonment if not used for future development or additional sampling and well head treatment prior to any reuse associated with BIG; **MM BIG HAZ-3** requires sampling, cleaning, permitting, and handling of potential on-site hazardous materials storage if USTs are discovered during construction; and **MM BIG HAZ-4** requires that the Applicant conduct assessment of any PEC sites in accordance with ASTM standards to address PEC's.

[2] The groundwater pumping limits that were formally established by a court order (judgment) in an adjudicated water basin and are enforced by the Water Master. Also see https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management/Adjudicated-Areas

Draft EIR Section 5.4: Biological Resources discusses BIG's potential impacts to biological resources. The CEQA questions relevant to biological resources (e.g., special status species, riparian habitat/other sensitive natural community, federal/state protected wetlands, and migratory wildlife corridors) are found in **Draft EIR Section 5.4.1: Impact Thresholds and Significance Criteria** (**Draft EIR** page 5.4-59), and the corresponding environmental analyses are found in **Draft EIR Section 5.4.2: Project Impacts and Mitigation Measures** beginning on **Draft EIR** page 5.4-60. BIG construction and operations would affect local biological resources. During construction, sensitive natural habitats such as desert dunes and riparian areas would be directly affected through clearing and vegetation removal, which would displace various plant and wildlife species. Key species affected include the desert tortoise, among others. With mitigation measures such as habitat preservation, relocation of species, biological monitors, and implementation of construction buffers, impacts would be reduced to less than significant. Overall, the Draft EIR found that BIG's impacts to biological resources would be less than significant through compliance with the established regulatory framework and incorporation of **MM BIG BIO-1** through **MM BIG BIO-37**. Impacts to biological resources **MM BIG BIO-1** through **MM BIG BIO-37** would reduce impacts to biological resources through the implementation of pre-construction surveys, avoidance and minimization measures, seasonal and spatial buffers, construction monitoring by qualified biologists, habitat protection and restoration, and compliance with applicable state and federal wildlife regulations, thereby avoiding direct impacts where feasible and minimizing or compensating for unavoidable impacts to special-status species, sensitive habitats, and jurisdictional resources.

I263-6 See **Consolidated Response 04** concerning general non-CEQA issues, **Consolidated Response 02** concerning significant and unavoidable impacts and the Statement of Overriding Considerations, **Consolidated Response 05-01** concerning requirements for mitigation measures, **Consolidated Response 05-02** concerning feasibility**, Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 06-04** concerning quality of life, **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses, and **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis.

I263-7 This comment is conclusory to the comments that preceded it. See **Consolidated Response 04** concerning general non-CEQA issues, **Consolidated Response 02** concerning significant and unavoidable impacts and the Statement of Overriding Considerations, **Consolidated Response 05-01** concerning requirements for mitigation measures, **Consolidated Response 05-02** concerning feasibility, and **Consolidated Response 06** concerning potential effects on communities.

COMMENT LETTER I264

I264

Comment re: B I G Draft Environmentalal Impact Report

Sharon Mabon <sharonmabon9@gmail.com>

Sat 12/13/2025 12:09 PM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

Cc:Supervisor.cook@bos.sbcounty.gov <Supervisor.cook@bos.sbcounty.gov>; Luther.Snoke@cao.sbcounty.gov <Luther.Snoke@cao.sbcounty.gov>;

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Dear Sirs,
I can't express how disappointed I was to learn that Helendale and Silver Lakes communities were not taken into consideration in the DEIR for the expansion of Barstow International Gateway. I am not opposed to its growth and the improved distribution of goods it will provide. I am opposed to reduced ingress and egress for my community. This needs to be a priority in order for this project to go forward. The safety level and quality of life here in Helendale should not be ignored by planners. Infrastructure must be included in the planning of any such expansion of the BNSF Facility. Please pursue an overpass or underpass (grade separation) to allow for smooth travel in and out of Route 66. The closure of Vista Road should NOT be a consideration. Do ensure funding from BNSF and various sources in your plans to add a grade separation. I am also sending written letters (10+) to the City of Barstow on this matter. I264-1
Thank you for your time and consideration on this matter.
Sharon Thompson Mabon
PO BOX 698 (27915 Fairacres Ln)
Helendale CA 92342

RESPONSE TO COMMENT LETTER I264, SHARON MABON

I264-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-01** concerning the geographic scope of the environmental analysis and definition of study area, **Consolidated Response 10-01** concerning accessibility concerns **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 06-04** concerning quality of life, **Consolidated Response 05** concerning feasible and enforceable mitigation; **Consolidated Response 10-06** concerning identifying feasible mitigation measures (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community. Finally, it is noted BIG does not propose to close Vista Road or make any other transportation improvement in the Silver Lakes/Helendale Community.

COMMENT LETTER I267

I267

BNSF Project

angels4mel@aol.com

Sun 12/14/2025 11:26 AM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

[NOTICE: THIS IS AN EXTERNAL EMAIL]
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Hard to believe that you honestly think this is good for Barstow considering the contamination that will take place, the noise, air quality. City of Barstow always keeps projects like this outlawed but you seem to think it's ok for the County areas, such as our Sylvan Community, obviously the people putting this all together don't live where we are, & don't have the reason we that we moved out in this area. Please consider the changes that will take place & have such an affect on our lives & generations to come. Hinkley was affected by the water & now everything else in our environment will be affected, not in a good way! Why do you think Surprise, AZ didn't want to have anything to do with the project. Thank you for listening to our concerns and consider them please! I267-1

Sent from the all new AOL app for iOS

RESPONSES TO COMMENT LETTER I267, PUBLIC COMMENTER 194

I267-1 Public engagement in the CEQA process is an essential part of environmental review, and involvement from community members is greatly appreciated. See **Consolidated Response 09-04** concerning quality of life, **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis, **Consolidated Response 09-04** concerning consideration of the Sylvan Community in the Hydrology and Water Quality analyses, and **Consolidated Response 09-07** concerning consideration of impacts to Sylvan Community private water wells.

COMMENT LETTER I268

I268

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I268-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I268-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I268-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I268-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I268-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I268-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I268-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I268-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I268-8

Sincerely,

Signature: Leonard Ulibarri (You can remain anonymous if you prefer.)
Print Name: Leonard Ulibarri
Mailing Address: 26378 Corona Dr
Helendale, CA 92342 Helendale CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

Emergency vehicles being able to rapidly respond to a crisis. We have no law enforcement here. We use the sheriff in Victorville from my understanding. As it is that's far let alone having to sit at the train tracks for an excessive amount of time when a crime is going down. They are expecting,with the new facility there will be one train after another. Also what about a medical emergency? The Helendale paramedics and fire dept are inside this community. How can they respond in a timely manner to a brush fire outside the community? It truly does not seem legal to me. The county has turned down an overpass once but my thoughts are Santa Fe is a private business why are they not the ones financially responsible? I will find out more at the meeting There is just more reasons to list. What about people going to work? Appointments? This is truly craziness. The community is upset because the county gave the paperwork to the City of Barstow to come up with all the Disclosures and Barstow , in a 1000 page report Never Listed Silver Lakes one time!!!!! I268-9

RESPONSE TO COMMENT LETTER I268, LEONARD ULIBARRI

I268-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 06-04** concerning quality of life.

I268-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I268-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning potential effects on the Silver Lakes/Helendale Community.

I268-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I268-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I268-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I268-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale

Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings.

I268-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I268-9 See **Consolidated Response 06-03** concerning community safety; **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings; **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings; **Consolidated Response 06** concerning potential effects on communities; **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community; **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings; **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community. BIG does not propose any transportation improvements near the Silver Lakes/Helendale community.

COMMENT LETTER I271

I271

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

Received
DEC 15 2025
City of Barstow

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I271-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I271-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I271-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I271-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I271-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I271-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I271-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I271-7 cont.

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I271-8

Sincerely,

Signature: Judy A. Hart (You can remain anonymous if you prefer.)
Print Name: Judy A. Hart
Mailing Address: P.O. Box 2232
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

To Supervisor Paul Cook, whom I have trusted & voted for over the years. I live in Helendale in the Silver Lakes community. I am writting to you because the Barstow International Gateway threatens Silver Lake's access to Route 66 which is the primary way in & out of our community. I am appalled to learn that this project has been handed over to just one city when it effects multiple communities. I271-9

Those of us who have lived in the Hi-Desert for many years remember the closing of George AFB and how many years the fights & delays ensued because — due to the self interest of one lone principality who was given oversight of a project that effected a group of communities.
Barstow has just proven to have that same non-inclusive self-interest by not considering the impact that the rails will have on their neighbors.
Your constituents need you & the County of San Bernardino to step up & demand that every community along the railway is provided with timely access to enter & exit major roads.
And, that there is an appropriate Disaster/Emergency Response Plan in place.
I thank you in advance for making sure that each & every effected comunity is well represented in this project — which we hope will benefit the railroad & improve our way of life as a whole.
Respectfully Judy Hart

RESPONSE TO COMMENT LETTER I271, JUDY HART

I271-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 06-04** concerning quality of life.

I271-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I271-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I271-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I271-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I271-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I271-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale

Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings.

I271-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I271-9 **Consolidated Response 06** concerning potential effects on communities; **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community; **Consolidated Response 06-03** concerning community safety; **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings; **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings.

COMMENT LETTER I274

I274

Deadline for comments – January 5, 2026

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

Received
DEC 15 2025
City of Barstow

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I274-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I274-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I274-3

- **Emergency Access:** Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I274-4
- **Hazardous Materials:** Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I274-5
- **Cumulative Impacts:** Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I274-6
- **Mitigation Commitment:** Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I274-7

operations increase train traffic through our area.

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I274-8

Sincerely,

Signature: Henry Morgan (You can remain anonymous if you prefer.)
Print Name: Henry morgan
Mailing Address: P.O. Box 726
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

I have a sister that has seizures and we need ambulance To come as fast as they can. Visa St. is the only way. I274-9

RESPONSE TO COMMENT LETTER I274, HENRY MORGAN

I274-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 06-04** concerning quality of life.

I274-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I274-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning potential effects on the Silver Lakes/Helendale Community.

I274-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I274-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I274-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I274-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale

Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings.

I274-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I274-9 See **Consolidated Response 06-03** concerning community safety; **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings; **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

COMMENT LETTER I275

I275

Deadline for comments – January 5, 2026

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

Received
DEC 15 2025
City of Barstow

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I275-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I275-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I275-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I275-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I275-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I275-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I275-7

operations increase train traffic through our area.

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I275-8

Sincerely,

Signature: Rosa Morgan (You can remain anonymous if you prefer.)
Print Name: Rosa Morgan
Mailing Address: P.O. Box 726
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

This is the only way people need to get to Victorville and Apple Valley, and Barstow. What happens to the Ambulance they can't do it either this is Uncalled for I275-9

RESPONSE TO COMMENT LETTER I275, ROSA MORGAN

I275-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 06-04** concerning quality of life.

I275-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I275-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I275-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I275-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I275-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I275-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale

Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings.

I275-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I275-9 See **Consolidated Response 06-03** concerning community safety; **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings; **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

COMMENT LETTER I276

I276

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I276-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I276-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I276-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I276-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I276-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I276-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I276-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I276-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I276-8

Sincerely, MARK Johnson

Signature: Beth Johnson (You can remain anonymous if you prefer.)
Print Name: Beth Johnson
Mailing Address: PO Box 1807
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

We already have an issue with the train stalling and spending our time. We have emergencies, the help will be stranded. Besides that what about school buses or just individuals time.
I realize Santa Fe is expanding but not at the community expensed. I am of the mind set of not of having no over pass. Please make this expansion for everyone. I276-9

RESPONSE TO COMMENT LETTER I276, MARK AND BETH JOHNSON

I276-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 06-04** concerning quality of life.

I276-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I276-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I276-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I276-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I276-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I276-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale

Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings.

I276-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I276-9 See **Consolidated Response 06-03** concerning community safety; **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings; **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

COMMENT LETTER I282

I282

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Received
DEC 15 2025
City of Barstow

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I282-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I282-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I282-3

- **Emergency Access:** Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I282-4
- **Hazardous Materials:** Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I282-5
- **Cumulative Impacts:** Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I282-6
- **Mitigation Commitment:** Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I282-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I282-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I282-8

Sincerely,

Signature: [signature] (You can remain anonymous if you prefer.)
Print Name: DALE BERGMAN
Mailing Address: PO BOX 1689
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

I AM CONCERNED AS WELL ABOUT GETTING TO EITHER VICTORVILLE OR BARSTOW FOR WORK. I282-9

RESPONSE TO COMMENT LETTER I282, DALE BERGMAN

I282-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 06-04** concerning quality of life.

I282-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I282-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I282-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I282-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I282-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I282-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale

Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings.

I282-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I282-9 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings; **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

COMMENT LETTER I283

I283

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Received
DEC 15 2025
City of Barstow

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I283-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I283-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I283-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I283-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I283-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I283-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I283-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I283-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I283-8

Sincerely,

Signature: Judy Bergman (You can remain anonymous if you prefer.)
Print Name: JUDY BERGMAN
Mailing Address: PO BOX 1689
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

I am concerned about the safety factor. That an ambulance will have a problem getting to a hospital and that it will delay the time -- seconds even that could make a huge difference. I283-9

Thank you for your consideration of this.

Judy Bergman

RESPONSE TO COMMENT LETTER I283, JUDY BERGMAN

I283-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 06-04** concerning quality of life.

I283-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I283-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I283-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I283-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I283-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I283-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale

Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings.

I283-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I283-9 See **Consolidated Response 06-03** concerning community safety; **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings; **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings**, Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at the Silver Lakes/Helendale Community at-grade crossings, **and Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community. BIG does not propose any transportation improvements near the Silver Lakes/Helendale community.

COMMENT LETTER I285

I285

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

Received
DEC 15 2025
City of Barstow

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I285-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I285-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I285-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I285-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I285-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I285-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I285-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I285-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I285-8

Sincerely,

Signature: Jay Matt McLaw (You can remain anonymous if you prefer.)
Print Name:
Mailing Address:
Helendale, CA 92342

Please feel free to hand write any additional cor[illegible]ns below about experiences you have had with the railroad tracks being blocked.

Terrible Health Hazard! I285-9

RESPONSES TO COMMENT LETTER I285, PUBLIC COMMENTER 196

I285-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 06-04** concerning quality of life.

I285-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I285-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I285-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I285-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I285-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I285-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale

Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings.

I285-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I285-9 Although unclear, it is assumed the comment refers to health risks at the Silver Lakes/Helendale Community. **Draft EIR Section 5.3: Air Quality** addresses air quality, including localized exposure to criteria pollutants, including particulate matter (PM) and a health risk analysis or "HRA." The EIR ambient air concentrations and cancer risks at 6,093 locations (receptors) surrounding BIG (i.e., at 3.5 miles from BIG), which are the locations of potential exposure for residents, off-site workers, and sensitive members of the public. Because MDAQMD does not provide guidance for dispersion modeling, the analysis uses South Coast AQMD's recommended receptor grid spacing of 50 meters over sensitive receptor locations; see **Draft EIR Figure 5.3-3: Centroid, Coarse, and Fine Receptor Grids – BIG** (page 5.3-45). As shown on **Draft EIR Figures 5.3-3** (page 5.3-45), the Silver Lakes Community/Helendale was considered in this modeling.

Potential impacts to sensitive receptors and health risk were analyzed under **Draft EIR Impact 5.3-3** (pages 5.3-124 to 5.3-161). The Draft EIR found BIG would result in potentially significant ambient air concentration impacts for construction PM10 emissions only; see **Draft EIR Table 5.3-29: Maximum Off-Site Construction Pollutant Concentrations (Mitigated)** and **Draft EIR Table 5.3-31: Maximum Off-Site Concentration from Operations (Mitigated)** (pages 5.12-82 through 5.12-87). However, these impacts would be less than significant at the Silver Lakes/Helendale Community; see **Draft EIR Figure 5.3-12: Operations Health Risk Assessment – West Leads (Mitigated)** (page 5.3-149) and **Draft EIR Figure 5.3-19: Combined Construction and Operational Health Risk Assessment – West Leads (Mitigated)** (page 5.3-156). **Draft EIR Figure 5.3-12: Operations Health Risk Assessment – West Leads (Mitigated)** (page 5.3-149) and **Draft EIR Figure 5.3-19: Combined Construction and Operational Health Risk Assessment – West Leads (Mitigated)** (page 5.3-156) show that the 10 in one million health risk contour does not extend to the Silver Lakes/Helendale community. Specifically, the 10 in one million contour is approximately 1.4 miles away from the closest edge of Helendale and the closest sensitive receptors are approximately 2.1 miles away from the 10 in one million contour. Additionally, the Silver Lakes community is approximately 3 miles away from the 10 in one million contour. Locations outside of the 10 in one million contour would have health risk levels less than the MDAQMD threshold and health risk impacts would be less than significant.

Furthermore, **Draft EIR Table 5.3-40: Unmitigated Net Operational DPM Emissions Along Corridor (Tons per Year)** (page 5.3-161) shows that DPM emissions would decrease west of

BIG (i.e., including the corridor segment near Silver Lakes/Helendale). BIG's DPM emission reduction occurs from using dedicated Tier 4 locomotives between the Ports and BIG and from modifying the fuel blend used within the Ports' existing fueling site to use up to ten percent renewable diesel. Therefore, BIG would improve DPM emissions in the Corridor and would result in a beneficial impact. Thus, there is no potential cancer risk, hazard index, or cancer burden impacts in the Corridor west of BIG. A less than significant impact would occur for all localized corridor impacts, including the west lead tracks near the Silver Lakes/Helendale Community; see **Draft EIR Table 5.3-40: Unmitigated Net Operational DPM Emissions Along Corridor (Tons per Year)** (page 5.3-161). Mitigation Measures (MM**) MM BIG AQ-1** through **MM BIG AQ-14** are incorporated to reduce construction and operational air quality impacts associated with BIG, particularly with respect to nearby sensitive receptors. These measures address fugitive dust control, equipment emissions standards, use of renewable diesel and low-VOC materials, truck idling and routing controls, and design features that support future electrification. Implementation of these measures would substantially reduce emissions of criteria pollutants and toxic air contaminants during construction and long-term operations. However, due to the scale and intensity of construction activities and ongoing freight-related operations, air quality impacts would remain significant and unavoidable with mitigation**.**

COMMENT LETTER I291

I291

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Received
DEC 15 2025
City of Barstow

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I291-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I291-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I291-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I291-4
- **Hazardous Materials:** Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I291-5
- **Cumulative Impacts:** Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I291-6
- **Mitigation Commitment:** Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I291-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I291-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I291-8

Sincerely,

Signature: James R. Johnson (You can remain anonymous if you prefer.)
Print Name: JAMES R. JOHNSON
Mailing Address: PO 1996
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked. MANY TIMES, SEVERAL OF THOSE TIMES WERE ALONG WITH EMERGENCY VEHICLE. I ATTEND A MEETING IN JULY 2023 ON THE BIG PROJECT AND THOUGHT THIS ISSUE WAS ADDRESS THEN. I291-9

RESPONSE TO COMMENT LETTER I291, JAMES JOHNSON

I291-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 06-04** concerning quality of life.

I291-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I291-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I291-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I291-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I291-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I291-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale

Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings.

I291-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I291-9 **See Consolidated Response 06-03** concerning community safety; **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings; **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at the Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community. BIG does not propose any transportation improvements near the Silver Lakes/Helendale community.

COMMENT LETTER I295

I295

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Received
DEC 15 2025
City of Barstow

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I295-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I295-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I295-3

- **Emergency Access:** Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I295-4
- **Hazardous Materials:** Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I295-5
- **Cumulative Impacts:** Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I295-6
- **Mitigation Commitment:** Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I295-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I295-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I295-8

Sincerely,

Signature: _____ (You can remain anonymous if you prefer.)
Print Name:
Mailing Address:
Helendale, CA 92342

Martn I. Porcelil
PO Box 2094
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

Once in Last 5 yrs. Was @ Vista Rd
was 1 hr. 35 min.
usual is 4 minutes.
once Ambulance on East side
RR tracks Life or.
trains constant. Very few trains.
Very concerned ER- trauma
care or AMI (Acute myocardial Infarction).
No mention Helendale in EIR? I295-9

RESPONSE TO COMMENT LETTER I295, MARTIN PORCELIL

I295-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 06-04** concerning quality of life.

I295-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

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I295-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I295-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I295-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I295-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale

Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings.

I295-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I295-9 See **Consolidated Response 06-03** concerning community safety; **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings; **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings; **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **and Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community. BIG does not propose any transportation improvements near the Silver Lakes/Helendale community.

COMMENT LETTER I326

I326

Community concerns

casey.slusser@gmail.com

Tue 12/16/2025 9:57 PM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

[NOTICE: THIS IS AN EXTERNAL EMAIL]
Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!

Caution! This message was sent from outside your organization.

I am writing as a resident of Capella Dr. located less than one block from the proposed Barstow International Gateway project site. While I recognize the economic goals of the city, the Draft Environmental Impact Report (DEIR) reveals significant, unmitigated risks that directly threaten my family's health, safety, and quality of life of everyone in our small community. I326-1

I urge the City to address the following critical concerns before any further project approvals.
First, according to the project documents, this facility will significantly increase local concentrations of Diesel Particulate Matter and Nitrogen Oxides. As a resident living less than a block away, my home is in the "high-exposure" zone. Long-term exposure to these pollutants is linked to increased cancer risks, respiratory illness, and cardiovascular disease. The DEIR must provide a more robust mitigation plan for "fence-line" residents, including high-efficiency (MERV 13+) air filtration systems for impacted homes. I326-2

Second, the Glint and Glare study confirms that reflections are "geometrically possible" for nearly all local dwellings. Being only a block away, the "moderate impact" classification which glare occurring for over three months a year is an unacceptable nuisance that will interfere with the quiet enjoyment of my property and most certainly lower its value. I326-3

Third, the increase of thousands of daily truck trips and the doubling of the local population will overwhelm our neighborhood streets. I am deeply concerned about the safety of local pedestrians and the ability of emergency services to reach our block during peak congestion hours. I326-4

Fourth, the LESA model indicates a permanent conversion of agricultural and open space into a massive industrial complex. For those of us who chose this area for its rural-residential balance, this project represents an irreversible loss of our community's identity and the reason we chose to purchase homes in this area. This impacts out entire quality of life. I326-5

I urge the City of Barstow mandate a **Health Risk Assessment** specifically for residents within a neighborhood radius of the project boundary and provide a detailed plan for noise barriers, light-shielding technology, and financial compensation for property value and quality of life lost. I326-6

Casey Slusser
760-646-6752

Sent from Casey's iPhone...

RESPONSES TO COMMENT LETTER I326, CASEY SLUSSER

I326-1 This comment is introductory to the comments that follow. See **Consolidated Response 04** concerning general non-CEQA issues.

I326-2 See **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis. The CEQA questions involving the issues raised in this comment are found under the "Impact Thresholds and Significance Criteria" subsections in **Draft EIR Section 5.3: Air Quality** and **Draft EIR Section 6.0: Cumulative Impacts**.

As discussed in **Draft EIR Section 5.3: Air Quality**, BIG's emissions from line-haul locomotives, switcher locomotives, rail yard operations, rail-related truck activity, and fugitive dust, are analyzed using conservative assumptions and dispersion modeling to evaluate impacts to nearby communities. The analysis concludes that BIG would result in significant air quality impacts, even with mitigation, due to its scale. However, the Draft EIR identifies and requires all feasible project-level mitigation measures to reduce effects to nearby receptors, to the extent feasible. See **Consolidated Response 05** concerning feasible and enforceable mitigation.

I326-3 See **Consolidated Response 09-05** concerning consideration of the Sylvan Community in the lighting analysis and **Response I1677-41**.

I326-4 See **Consolidated Response 06-03** concerning community safety, **Consolidated Response 06-02** concerning the role of social and economic issues under CEQA, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings**,** and **Draft EIR Section 5.15: Transportation** concerning the number of truck trips generated as a result of BIG.

I326-5 See **Consolidated Response 06-04** concerning quality of life. BIG is consistent with the proposed General Plan land use plan framework. Therefore, the General Plan would not conflict with the proposed policies. As discussed in **Draft EIR Section 5.2: Agriculture and Forestry Resources**, agricultural land conversion from BIG was evaluated using the LESA model and determined to result in less than significant impacts based on the characteristics and regional context of the affected lands.

I326-6 See **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis and **Draft EIR Appendix 5.3 BIG-1: Air Quality Technical Report** concerning health risks and potential air quality impacts to the Sylvan Community, **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses, **Consolidated Response 09-05** consideration of the Sylvan Community in the lighting analysis, **Consolidated Response 0602** concerning the role of social and economic issues under CEQA, **Consolidated Response 06-05** concerning decreased property values, and **Consolidated Response 06-04** concerning quality of life.

COMMENT LETTER I328

I328

BIG Project

Jamie Rodriguez <gigichardonnay@yahoo.com>

Tue 12/16/2025 1:37 PM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

[NOTICE: THIS IS AN EXTERNAL EMAIL]
Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!

Caution! This message was sent from outside your organization.

There is no reason they are planning to put the solar panels directly across from houses. They have purchased so much land that they could use. This will cause a glare as noted in the report which will negatively affect our quality of life and our property values. Please stop this solar project from being allowed so close to 45 homes that are within city limits
Sent from my iPhone

I328-1

RESPONSES TO COMMENT LETTER I328, JAMIE RODRIGUEZ

I328-1 BIG's light and glare impacts are addressed in **Draft EIR Impact 5.1-4** page 5.1-65 onward. Additionally, a Glare Analysis was performed for BIG to identify any glare created by BIG's proposed solar farm; see **Draft EIR Appendix 5.1 BIG-2: BIG Solar Farm Glare Study**. A six-foot privacy fence is planned around the solar farm area; see **Draft EIR Figure 5.1-20: Visual Simulation 8: Solar Farm at the Southwest Corner of Main Street at Country Club Drive (facing southwest)** (page 5.1-57). This visual screening would reduce or eliminate glare identified by acting as a visual obstruction. The Draft EIR concluded that the solar farm would not create a new source of substantial glare that would adversely affect daytime views in the area. Additionally, as discussed in **Draft EIR Section 5.1: Aesthetics** (page 5.1-72), BIG's operational lighting would also adhere to the BIG Specific Plan's lighting standards and guidelines detailed in BIG Specific Plan Chapter 3: Development Regulations and Chapter 4: Design Guidelines. These standards and guidelines are designed to minimize potential glare impacts. The Draft EIR concluded that the solar farm would result in a less than significant impact (**Draft EIR** pages 5.1-70 and 5.1-71).

COMMENT LETTER I343

BIG DEIR – Silver Lakes/Helendale I343

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I343-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I343-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I343-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I343-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I343-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I343-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I343-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I343-7 cont.

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I343-8

Sincerely,

Signature: Sandra Wood (You can remain anonymous if you prefer.)
Print Name: SANDRA WOOD
Mailing Address: PO BOX 11019
Helendale, CA 92342 HELENDALE CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

We are a growing community and need access to work shopping and medical concerns. Sandra Wood I343-9

RESPONSE TO COMMENT LETTER I343, SANDRA WOOD

I343-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 06-04** concerning quality of life.

I343-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I343-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I343-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I343-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I343-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I343-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale

Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings.

I343-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I343-9 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings; **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at the Silver Lakes/Helendale Community at-grade crossings; and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings. BIG does not propose any transportation improvements near the Silver Lakes/Helendale community.

COMMENT LETTER I352

I352

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I352-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I352-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I352-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I352-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I352-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I352-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I352-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I352-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I352-8

Sincerely,

Signature: Kathy R. Baker (You can remain anonymous if you prefer.)
Print Name: Kathy Baker
Mailing Address: PO Box 3203
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

Dec 30th Board mtg. I352-9

RESPONSE TO COMMENT LETTER I352, KATHY BAKER

I352-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 06-04** concerning quality of life.

I352-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I352-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I352-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I352-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I352-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I352-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale

Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings.

I352-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I352-9 The comment is noted. Public engagement in the CEQA process is an essential part of environmental review, and involvement from community members is greatly appreciated. See **Consolidated Response 04** concerning general non-CEQA issues and **Consolidated Response 01** concerning community outreach and the Draft EIR public review period.

COMMENT LETTER I360

I360

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I360-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I360-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I360-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I360-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I360-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I360-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I360-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I360-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I360-8

Sincerely,

Signature: _____ (You can remain anonymous if you prefer.)
Print Name: Loretta Palminteri
Mailing Address:
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

Long train wait time I360-9

RESPONSE TO COMMENT LETTER I360, LORETTA PALMINTERI

I360-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 06-04** concerning quality of life.

I360-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I360-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I360-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I360-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I360-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I360-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale

Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings.

I360-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I360-9 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings and **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings.

COMMENT LETTER I368

I368

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

RECEIVED
DEC 17 2025

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I368-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I368-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I368-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I368-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I368-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I368-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I368-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I368-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I368-8

Sincerely,

Signature: Charles Palmintesi (You can remain anonymous if you prefer.)
Print Name: Charles Palmintesi
Mailing Address:
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.
Four mile trains & we need another outlet! I368-9

RESPONSE TO COMMENT LETTER I368, CHARLES PALMINTERI

I368-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 06-04** concerning quality of life.

I368-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I368-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I368-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I368-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I368-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I368-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale

Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings.

I368-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I368-9 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

COMMENT LETTER I369

I369

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I369-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I369-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I369-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I369-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I369-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I369-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I369-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I369-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I369-8

Sincerely,

Signature: _____ (You can remain anonymous if you prefer.)
Print Name: M F Porcelli
Mailing Address: PO Box 2094
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

Here 8 yrs:
1. once Ambulance on East Side tracks, lights on – 45 minute wait
2. train longer – 5 minute wait not uncommon
3. concerned tankers + potential explosion
4. Vista crossing & RR tracks universal crossing 90 years.

I369-9

RESPONSE TO COMMENT LETTER I369, MJ PORCELIL

I369-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 06-04** concerning quality of life.

I369-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I369-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I369-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I369-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I369-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I369-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale

Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings.

I369-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I369-9 See **Consolidated Response 06-03** concerning community safety; **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings; **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings.

COMMENT LETTER I372

I372

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

DEC 1 2025
RECEIVED

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I372-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I372-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I372-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I372-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I372-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I372-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I372-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I372-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I372-8

Sincerely,

Signature: Brenda Gaines (You can remain anonymous if you prefer.)
Print Name: ROBERT & BRENDA GAINES
Mailing Address: 35434 CARMEL CT
Helendale, CA 92342 BARSTOW, CA 92311

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

WE TRAVEL TO SILVER LAKES FROM BARSTOW 2 TO 3 TIMES A WEEK FOR CHURCH & BIBLE STUDIES. BUT MORE THAN THIS WE ARE CONCERNED ABOUT OUR FRIENDS NOT GETTING ACCESS IN OR OUT TO THEIR HOMES DO TO THE INCREASED TRAIN TRAFFIC. I372-9

THIS COULD COST SOMEONE'S LIFE IF AN AMBULANCE OR PARAMEDIC GETS STUCK AT THE TRACKS BY INCREASED TRAIN TRAFFIC. I372-10

THANKS FOR CONSIDERING THIS PROBLEM & NEED TO PROTECT SILVER LAKES RESIDENTS. I372-11

BOB & BRENDA GAINES.

RESPONSE TO COMMENT LETTER I372, BRENDA GAINES

I372-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 06-04** concerning quality of life.

I372-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I372-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I372-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** potential impacts related to hazardous materials, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I372-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I372-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I372-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale

Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings.

I372-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I372-9 See **Consolidated Response 06-03** concerning community safety; **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings; **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings.

I372-10 See **Consolidated Response 06-03** concerning community safety; **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community; **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings; and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I372-11 See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER I373

I373

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

RECEIVED
DEC 17 2025

RECEIVED
DEC 17 2025

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I373-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I373-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I373-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I373-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I373-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I373-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I373-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I373-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I373-8

Sincerely,

Signature: Tony R Ferronato (You can remain anonymous if you prefer.)
Print Name: Tony R. Ferronato
Mailing Address: 27977 Golf Ct. / P.O. Box 2143
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

(Fire Truck, Ambulance)

Please, make sure we have good access to route 66 while building a bridge or whatever permanate access you plan to do! we don't want to be stuck in here with NO ACCESS, we need it to work, school, Doctors appt & emergency I373-9

thank you!
Tony R Ferronato

RESPONSE TO COMMENT LETTER I373, TONY FERRONATO

I373-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 06-04** concerning quality of life.

I373-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I373-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I373-4 See **Consolidated Response 05** concerning feasible and enforceable mitigation and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I373-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I373-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I373-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings.

I373-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I373-9 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-04** concerning the increased rail activity's effects regarding traffic delays and school transportation needs at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

COMMENT LETTER I375

I375

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

RECEIVED
DEC 17 2025

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I375-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I375-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I375-3

- **Emergency Access:** Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I375-4
- **Hazardous Materials:** Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I375-5
- **Cumulative Impacts:** Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I375-6
- **Mitigation Commitment:** Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I375-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I375-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I375-8

Sincerely,

Signature: Janice Jerome (You can remain anonymous if you prefer.)
Print Name:
Mailing Address: P.O. Box 2143
Helendale, CA 92342 Helendale, Ca 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

I am concerned that emergency vehicles will be stuck at the train. There are alot of elderly people who lives here. We hear & see ambulances several times a week. I375-9

I am concerned for children who are bused here from outside of our community. Train delays will impact their times at school as well as getting home. I375-10

I am concerned about any appointments we have planned outside of our community. If a train causes a delay, how can we know how to schedule anything in our lives!? I375-11

Thank you for hearing me! I375-12

RESPONSE TO COMMENT LETTER I375, JANICE FERRONATO

I375-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 06-04** concerning quality of life.

I375-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I375-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I375-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I375-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I375-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I375-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale

Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings.

I375-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I375-9 See **Consolidated Response 06-03** concerning community safety; **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings; **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings.

I375-10 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 10-04** concerning the increased rail activity's effects regarding traffic delays and school transportation needs at Silver Lakes/Helendale Community at-grade crossings.

I375-11 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings.

I375-12 See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER I398

I398

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Received
DEC 1 8 2025
City of Barstow

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I398-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I398-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I398-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I398-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I398-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I398-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I398-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I398-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I398-8

Sincerely,

Signature: Giselle B. Garcia (You can remain anonymous if you prefer.)
Print Name: Giselle Beaton-GARCIA
Mailing Address: 27924 FAIRACRES LN #3065
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

TRAINS Caused me to be late to work and doctors Appointments. It's difficult to get out of community with TRAINS blocking ROAD. I398-9

RESPONSE TO COMMENT LETTER I398, GISELLE BEATON-GARCIA

I398-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 06-04** concerning quality of life.

I398-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I398-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I398-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I398-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I398-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I398-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale

Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings.

I398-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I398-9 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **and Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

COMMENT LETTER I400

I400

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

Received
DEC 1 8 2025
City of Barstow

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I400-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I400-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I400-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I400-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I400-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I400-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I400-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I400-7 cont.

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I400-8

Sincerely,

Signature: Megan Story (You can remain anonymous if you prefer.)
Print Name: Megan Story
Mailing Address: 27875 Fairacres Lane Helendale CA 92342
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

This overpass could be a matter of life and death for some people, this project is important and a necessary addition for our community. I400-9

RESPONSE TO COMMENT LETTER I400, MEGAN STORY

I400-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 06-04** concerning quality of life.

I400-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I400-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I400-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I400-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I400-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I400-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale

Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings.

I400-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I400-9 See **Consolidated Response 05** concerning feasible and enforceable mitigation; **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety; **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings; **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings; and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings.

COMMENT LETTER I402

I402

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Received
DEC 18 2025
City of Barstow

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I402-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I402-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I402-3

- **Emergency Access:** Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I402-4
- **Hazardous Materials:** Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I402-5
- **Cumulative Impacts:** Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I402-6
- **Mitigation Commitment:** Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I402-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I402-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I402-8

Sincerely,

Signature: Steven Koller (You can remain anonymous if you prefer.)
Print Name: Steven Koller
Mailing Address: PO Box 2715
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

Waiting for the train is a pain! I402-9

RESPONSE TO COMMENT LETTER I402, STEVEN KOLLER

I402-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 06-04** concerning quality of life.

I402-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I402-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I402-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I402-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I402-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I402-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale

Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings.

I402-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I402-9 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings and **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings.

COMMENT LETTER I404

I404

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

Received
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City of Barstow

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I404-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I404-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I404-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I404-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I404-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I404-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I404-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I404-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I404-8

Sincerely,

Signature: _____ (You can remain anonymous if you prefer.)
Print Name: Angela Wirth
Mailing Address: PO Box 2091
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked. I404-9

I've been late for appointments because of the train.

RESPONSE TO COMMENT LETTER I404, ANGELA WHITT

I404-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 06-04** concerning quality of life.

I404-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

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I404-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I404-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I404-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale

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COMMENT LETTER I405

I405

BIG DEIR – Silver Lakes/Helendale

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Deadline for comments – January 5, 2026

Mail To: City of Barstow
220 East Mountain View Street, Suite A
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Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
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BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I405-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I405-8

Sincerely,

Signature: Sharon Thompson Mabon (You can remain anonymous if you prefer.)
Print Name: Sharon Thompson Mabon
Mailing Address: PO Box 698 (27915 Fairacres Lane)
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

Although I love Helendale / Silver Lakes for its quiet, secluded location there are many reasons why I and others must leave to travel out to Barstow or Victor Valley. I405-9

Many of these events are time sensitive and delays are not only annoying they can be life threatening. We try to build extra travel time in to accommodate train delays and "getting stuck behind trucks + busses." When despite planning that extra time, an additional delay occurs such as a 2nd train coming from the other direction, we may be forced to cancel medical appts., or possibly try to make up for lost time by driving faster than recommended thereby increasing danger levels on the already high-risk drive into town. I405-10

Longer than usual trains will impact the quality of life for the 8 thousand residents in Silver Lakes/Helendale.

I call for a mandatory grade separation before the BIG project recieves approval. I405-11

Thank you.

Sharon Thompson Mabon

RESPONSE TO COMMENT LETTER I405, SHARON MABON

I405-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 06-04** concerning quality of life.

I405-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I405-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I405-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I405-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I405-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I405-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale

Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings.

I405-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I405-9 See **Consolidated Response 06** concerning potential effects on communities; **Consolidated Response 06-03** concerning community safety; **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings; and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I405-10 See **Consolidated Response 06-03** concerning community safety; **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings; and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I405-11 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community, **Consolidated Response 06-04** concerning quality of life, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; and **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

COMMENT LETTER I406

I406

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

Received
DEC 18 2025
City of Barstow

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I406-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I406-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I406-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I406-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I406-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I406-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I406-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area.

I406-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community.

I406-8

Sincerely,

Signature: Rebecca Markarian (You can remain anonymous if you prefer.)
Print Name: Rebecca Markarian
Mailing Address: Box 504
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

Few Years Back— My Sister-in-law had medical issue & Ambulance was taking her to hospital— Got Stuck at Rail CROSSing for 10-15 MINS. unacceptable

Thank

I406-9

RESPONSE TO COMMENT LETTER I406, REBECCA MARKARIAN

I406-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 06-04** concerning quality of life.

I406-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

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I406-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I406-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I406-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I406-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale

Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings.

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I406-9 See **Consolidated Response 06-03** concerning community safety; **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings; and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

COMMENT LETTER I407

Dec. 14, 2025

PRIORITY !

I407

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Received
DEC 18 2025
City of Barstow

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I407-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I407-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I407-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I407-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I407-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I407-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I407-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I407-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I407-8

Sincerely,

Janice R. Sloma

Signature: ~~Janice R. Sloma~~ (You can remain anonymous if you prefer.)
Print Name:
Mailing Address: P.O. Box 717
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

My concern is medical emergencies in case we need to get to a hospital fast. Also, safety for our community so Police can get in & out from Vista & not just from Shadow Mtn. & 395. I407-9

I believe its very important to have our traffic flowing openly thru the tracks. I rote we make an underpass or overpass immediately. No more waiting for 5-10 minutes for the train to pass! I407-10

Thank you. I407-11

Janice Sloma
12/14/25

RESPONSE TO COMMENT LETTER I407, JANICE SLOMA

I407-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 06-04** concerning quality of life.

I407-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I407-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I407-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I407-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I407-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I407-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale

Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings.

I407-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I407-9 See **Consolidated Response 06-03** concerning community safety; **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings; **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings; and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I407-10 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I407-11 See **Consolidated Response 05** concerning feasible and enforceable mitigation; **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **and Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

COMMENT LETTER I409

I409

State of California—Transportation Agency GAVIN NEWSOM, Governor

DEPARTMENT OF CALIFORNIA HIGHWAY PATROL
300 East Mountain View St.
Barstow, CA 92311
(760) 255-5900
(800) 735-2929 (TT/TDD)
(800) 735-2922 (Voice)

December 15, 2025

File No.: 835.17401.20098

Received
DEC 1 8 2025
City of Barstow

City of Barstow
220 E. Mountain View Street, Suite A
Barstow, California 92311

Subject: SCH# 2024020501

The Barstow Area of the California Highway Patrol received the "Notice of Completion and Environmental Document Transmittal," of the environmental document for the proposed City of Barstow General Plan Update and Barstow International Gateway (BIG) Specific Plan for State Clearinghouse (SCH# 2024020501). The California Highway Patrol's interest in commenting, surrounds our concern for public safety, specifically traffic in the Barstow area. I409-1

The Department's concerns with the potential impact of this project could include the following: increased traffic congestion, increased hazardous materials transportation, additional enforcement demands, increased railway incidents necessitating evacuations, and increased incidents requiring emergency response during construction. Commercial truck trailer combination vehicle traffic on local roadways and freeways will increase as materials and products are transported to, and from the worksite. I409-2

This project could have an impact on our operations due to the increased traffic congestion, which would necessitate the need for additional traffic control measures to mitigate the potential increase in traffic crashes. We are hopeful work project operators will diligently establish, monitor, and enforce work project rules related to vehicle safety as CHP personnel work to ensure compliance with the California Vehicle Code provisions. I409-3

If you have any questions regarding these concerns, please contact me at the California Highway Patrol Barstow Area office at (760) 255-5900. I409-4

Sincerely,

Adam Carmichall - for

N. KING, Captain
Commander
Barstow Area

Safety, Service, and Security *An Internationally Accredited Agency*

RESPONSE TO COMMENT LETTER I409, ADAM CARMICHAEL - CHP

I409-1 The comment is an introductory comment to the following comments. See **Consolidated Response 04** concerning general non-CEQA issues.

I409-2 See **Draft EIR Section 5.9: Hazards and Wildfire**, **Section 5.14: Public Services and Recreation**, and **Section 5.15: Transportation** regarding BIG's potential impacts associated with increased traffic congestion, increased hazardous materials transportation, additional enforcement commands, evacuations, and emergency response.

I409-3 **Draft EIR Section 5.15: Transportation** evaluates BIG's transportation safety and operational considerations including circulation-system policy consistency, transportation hazards from design or incompatible uses, and emergency access. The Draft EIR concludes that BIG is consistent with applicable State and regional transportation policies and would not substantially increase hazards due to geometric design features or incompatible uses; see **Draft EIR Impact 5.15-1** and **Draft Impact 5.15-3** (starting on pages 5.15-56 and 5.15-67, respectively).

The Draft EIR identifies that construction may involve temporary lane/roadway closures and increased construction traffic, and therefore a Traffic Control Plan (TCP) would be prepared and reviewed/approved by the City (and County where applicable), in consultation with local law enforcement and fire officials, and consistent with the California Manual on Uniform Traffic Control Devices. The TCP would include signage and traffic control devices (and flaggers as needed), provide for 24-hour emergency vehicle access, and maintain safe routing for vehicles, bicyclists, and pedestrians through or around work zones.

During BIG operations, BIG would reduce heavy-duty truck travel at a broader (national) scale by shifting freight movement from trucks to trains, this reduction in truck miles traveled (TMT) helps alleviate congestion and improves overall network safety.

I409-4 See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER I410

I410

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I410-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I410-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I410-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I410-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I410-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I410-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I410-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I410-7 cont.

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I410-8

Sincerely,

Signature: Max Hernandez (You can remain anonymous if you prefer.)
Print Name: Max Hernandez
Mailing Address: 27535 Lake View Dr. #75; Po Box 894
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

There have been instances where a train will stop on the tracks ~~that~~ not that separates the SL community from Route 66. It has caused the need to go to 365 & ~~that~~ not thus significantly increasing the amount of time to get to places such as the hospital. This places people at risk of possibly not getting the care they need. I410-9

RESPONSE TO COMMENT LETTER I410, MAX HERNANDEZ

I410-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 06-04** concerning quality of life.

I410-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I410-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

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I410-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I410-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I410-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale

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COMMENT LETTER I412

Submission of public comment on 12/12/2025

Mart Family <deemart43@yahoo.com>

Fri 12/19/2025 3:02 PM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

[NOTICE: THIS IS AN EXTERNAL EMAIL]
Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!

Caution! This message was sent from outside your organization.

We submitted a public comment on 12/12/2025 in regards to the BIG Project. The comment is yet to be posted on the City of Barstow's website. It is our understanding that comments are posted within 5 days. Could you please tell us when our comment will post? I412-1
Thank you,
DM & RM, residents of Sylvan Av. Community, Barstow, CA

RESPONSES TO COMMENT LETTER I412, MART FAMILY

I412-1 This is a general inquiry question asking when their previous public comment **I9,** submitted on December 12, 2025, will be posted. The previous comment was posted, and this comment has been resolved.

COMMENT LETTER I426

How much IS Barstow getting to pay you for this outrages Proposal?

I426

Received by City 12/22/2025

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)

Deadline for comments – January 5, 2026

The railroad has Billions How There Builded an overpass

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I426-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I426-2

Received
DEC 22 2025
City of Barstow

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I426-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I426-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I426-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I426-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or Railroad

How much is Barstow getting to pay you for this outrages Proposal? I426-7

Received by City 12/22/2025

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I426-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I426-8

Sincerely,

Signature: Veronique Nieman (You can remain anonymous if you prefer.)
Print Name: VERONIQUE NIEMAN
Mailing Address: 10801 Bot 3725
Helendale, CA 92342 Helendale, Ca. 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

The Railroad has Billions
Yet them pay for an overpass
Also, have Barstow Rail Road
Build a overpass from Rt 66
to Hyw. 18.

12/125

Respond to City of Barstow
202 E. Mountain View, STE A
Barstow, Ca 92311

I426-9

RESPONSE TO COMMENT LETTER I426, VERONIQUE NIEMAN

I426-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 06-04** concerning quality of life.

I426-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I426-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I426-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I426-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I426-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I426-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale

Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings.

I426-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I426-9 See **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

COMMENT LETTER I461

RR expansion plans

Deborah Hartson <debhartson@gmail.com>

Tue 12/23/2025 1:36 PM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

[NOTICE: THIS IS AN EXTERNAL EMAIL]
Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!

Caution! This message was sent from outside your organization.

I own 6 rentals in Silver Lakes, my renters and I are concerned about your most recent RR Expansion Plan. Can you please take the time to explain how it will impact our comings and goings, not to mention emergencies. How many more trains per hour can we expect to cross the Vista crossing in Helendale with the expansion? Will there be another way to get across Helendale Vista tracks so that our daily work and traveling routines will not be disrupted any more than it already is by all the train traffic? In addition, how will emergency vehicles enter and exit without having to wait for longer trains to pass, not to mention should one of the trains break down, which has happened multiple times, and cause an emergency vehicle to be unable to reach their life or death destinations? I461-1

Thank you, looking forward to your response.
Deborah Hartson
Debhartson@gmail.com
657-294-7408
cc: Pete Aguilar 33rd district @ aguilar.house.gov

RESPONSES TO COMMENT LETTER I461, DEBORAH HARTSON

I461-1 See **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings.

COMMENT LETTER I462

I462

Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Greg Morck <gmorck@msn.com>

Tue 12/23/2025 12:54 PM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

[NOTICE: THIS IS AN EXTERNAL EMAIL]
Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!

Caution! This message was sent from outside your organization.

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)

Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I462-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I462-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I462-3

• Emergency Access: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I462-4

• Hazardous Materials: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I462-5

• Cumulative Impacts: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I462-6

• Mitigation Commitment: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I462-7

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I462-8

Sincerely,

Signature: _____ (You can remain anonymous if you prefer.)

Print Name: Greg, Lisa and Bailey Morck

Mailing Address: PO Box 669

Helendale, CA 92342

once while rushing my dad to hospital i got stuck at the crossing for at least 15 minutes, a train stopped completely. I462-9

RESPONSE TO COMMENT LETTER I462, GREG MORCK

I462-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 06-04** concerning quality of life.

I462-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I462-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I462-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I462-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I462-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I462-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale

Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings.

I462-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I462-9 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **and Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings.

COMMENT LETTER I463

I463

Re: BNSF BIG PROJECT in Helendale and Silver Lakes

Susan Karaiscos-Tschida <isue50@msn.com>

Tue 12/23/2025 3:02 PM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

[NOTICE: THIS IS AN EXTERNAL EMAIL]
Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!

Caution! This message was sent from outside your organization.

Mail To: City of Barstow

220 East Mountain View Street, Suite A

Barstow, CA 92311

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)

Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I463-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I463-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I463-3

• Emergency Access: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I463-4

• Hazardous Materials: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I463-5

• Cumulative Impacts: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I463-6

• Mitigation Commitment: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I463-7

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I463-8

Sincerely,

Signature: Susan Karaiscos Tschida (You can remain anonymous if you prefer.)

Print Name:

Mailing Address: PO Box 834

Helendale, CA 92342

I'm very concerned about the emergency services not being able to get through if a Train stops or rushing through without letting the residents get by. And I'm concerned about out property values as well as , crime from homeless jumping off the trains, and any accidents like the train derailing and /or spilling hazard materials. I463-9

RESPONSE TO COMMENT LETTER I463, SUSAN TSCHIDA

I463-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 06-04** concerning quality of life.

I463-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I463-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I463-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I463-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I463-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I463-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale

Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings.

I463-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, and **Consolidated Response 05** concerning feasible and enforceable mitigation.

I463-9 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **and Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings. See **Consolidated Response-02** concerning the role of social and economic issues under CEQA and **Consolidated Response 06-05** concerning decreased property values. See **Consolidated Response 07** concerning potential impacts related to hazardous materials (e.g., providing a disaster response plan to address potential spills, derailments, and other emergencies).

Concerning crime from homeless jumping off the trains, BIG proposes security measures to incorporate "defensible space" and other crime prevention features (e.g., perimeter fencing, security gates, lighting, and Railroad Police); see **Draft EIR Section 5.14: Public Services and Recreation** (pages 5.14-55 through 5.14-57).

COMMENT LETTER I1142

I1142

BNSF project

angels4mel@aol.com

Wed 12/24/2025 8:34 AM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

[NOTICE: THIS IS AN EXTERNAL EMAIL]
Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!

Caution! This message was sent from outside your organization.

We are asking for more time, we keep thinking of questions & feel it's very important for our health! We have family & friends it's going to affect. Please give us more time to work with this decision of yours! Thank you!
Carmela Gonzalez

I1142-1

Sent from the all new AOL app for iOS

RESPONSES TO COMMENT LETTER I1142, CARMELA GONZALEZ

I1142-1 See **Consolidated Response 01** concerning community outreach and the Draft EIR public review period.

COMMENT LETTER I1144

RECEIVED
DEC 24 2025

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

I1144

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I1144-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I1144-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I1144-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I1144-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I1144-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I1144-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I1144-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I1144-7 cont.

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I1144-8

Sincerely,

Signature: CATHERINE THOMPSON (You can remain anonymous if you prefer.)
Print Name:
Mailing Address: 14895 GREENBRIAR DRIVE P.O BOX 1965
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

I1144-9

I have been stuck at RR Tracks Several Times. we need a Bridge At Vista Rd.

RESPONSE TO COMMENT LETTER I1144, CATHERINE THOMPSON

I1144-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 06-04** concerning quality of life.

I1144-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I1144-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1144-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1144-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I1144-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1144-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale

Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at the Silver Lakes/Helendale Community at-grade crossings.

I1144-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1144-9 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 05** concerning feasible and enforceable mitigation; and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

COMMENT LETTER I1145

RECEIVED
DEC 24 2025

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

I1145

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I1145-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I1145-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I1145-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I1145-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I1145-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I1145-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I1145-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area.

I1145-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community.

I1145-8

Sincerely,

Signature: _____ (You can remain anonymous if you prefer.)
Print Name: Erica Livingston
Mailing Address: PO Box 1965
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

A Bridge is Needed At Vista Rd. Because if there is going to Be more trains going By we will be stuck here. Thank You

I1145-9

RESPONSE TO COMMENT LETTER I1145, ERICA LIVINGSTON

I1145-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings accessibility, and **Consolidated Response 06-04** concerning quality of life.

I1145-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I1145-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1145-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1145-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I1145-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1145-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade

separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at the Silver Lakes/Helendale Community at-grade crossings.

I1145-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1145-9 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings and **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings; **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

COMMENT LETTER I1146

RECEIVED
DEC 2 4 2025

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

I1146

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I1146-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I1146-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I1146-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I1146-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I1146-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I1146-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I1146-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I1146-7 cont.

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I1146-8

Sincerely,

Signature: Brenda L Bidinger (You can remain anonymous if you prefer.)
Print Name: Brenda L Bidinger
Mailing Address: P.O. Box 1965
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

We Need a Bridge at Vista Rd.
I was stuck at RR Tracks. I1146-9

RESPONSE TO COMMENT LETTER I1146, BRENDA BIDINGER

I1146-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings accessibility, and **Consolidated Response 06-04** concerning quality of life.

I1146-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I1146-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1146-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1146-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I1146-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1146-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade

separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at the Silver Lakes/Helendale Community at-grade crossings.

I1146-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1146-9 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings and **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings; **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

COMMENT LETTER I1147

RECEIVED
DEC 2 4 2025

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

I1147

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I1147-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I1147-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I1147-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I1147-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I1147-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I1147-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I1147-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I1147-7 cont.

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I1147-8

Sincerely,

Signature: Fred Palacio (You can remain anonymous if you prefer.)
Print Name: Fred Palacio
Mailing Address: P.O Box 1965
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

I was late to work From Train delays. we Need a Bridge at Vista Rd, I1147-9

RESPONSE TO COMMENT LETTER I1147, FRED PALACIO

I1147-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings accessibility, and **Consolidated Response 06-04** concerning quality of life.

I1147-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I1147-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1147-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1147-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I1147-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1147-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade

separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at the Silver Lakes/Helendale Community at-grade crossings.

I1147-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1147-9 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings and **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings; **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

COMMENT LETTER I1161

RECEIVED
DEC 2 6 2025

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

I1161

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I1161-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I1161-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I1161-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I1161-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I1161-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I1161-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I1161-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I1161-7 cont.

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I1161-8

Sincerely,

Signature: Randall V Herron (You can remain anonymous if you prefer.)
Print Name: Randall V Herron
Mailing Address: PO Box 1138
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

As a senior living in Silver Lakes for over 25 years I feel BNSF and all the Companies involved in the Big Project should help the Community with building a bridge at the Vista Crossing. Very important life saving situation. Thank you I1161-9

RESPONSE TO COMMENT LETTER I1161, RANDALL HERRON

I1161-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings accessibility, and **Consolidated Response 06-04** concerning quality of life.

I1161-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I1161-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1161-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1161-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I1161-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1161-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade

separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at the Silver Lakes/Helendale Community at-grade crossings.

I1161-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1161-9 See **Consolidated Response 05** concerning feasible and enforceable mitigation; **Consolidated Response 06-03** concerning community safety; **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings and **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings; **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings.

COMMENT LETTER I1164

RECEIVED
DEC 2 6 2025

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

I1164

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I1164-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I1164-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I1164-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I1164-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I1164-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I1164-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I1164-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I1164-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I1164-8

Sincerely,

Signature: Richard J. Clabby (You can remain anonymous if you prefer.)
Print Name: RICHARD J. CLABBY
Mailing Address: P.O. BOX 2185
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

1. THE SHADOW MOUNTAIN RD. BRIDGE. I1164-9
2. VISTA RD. BEING BLOCKED BY STOPPED TRAINS, I1164-10

RESPONSE TO COMMENT LETTER I1164, RICHARD CLABBY

I1164-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings accessibility, and **Consolidated Response 06-04** concerning quality of life.

I1164-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I1164-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1164-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1164-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I1164-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1164-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade

separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at the Silver Lakes/Helendale Community at-grade crossings.

I1164-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1164-9 This comment mentions the Shadow Mountain Road Bridge but does not raise any significant environmental issues. See **Consolidated Response 04** concerning general non-CEQA issues.

I1164-10 **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings.

COMMENT LETTER I1169

The BIG Project and Specific Plan Submission

I1169

Sheila Compton <qualityinn.barstow.sheila@gmail.com>

Sun 12/28/2025 3:15 PM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

Cc:Tumas Patel <tumaspatel@gmail.com>;

[NOTICE: THIS IS AN EXTERNAL EMAIL]
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Caution! This message was sent from outside your organization.

Barstow's General Plan [into 2048] to be the '*Hub of the West creating a prosperous and resilient future'* delineates from incorporating its vital economic tourism role within the overall structure of future planning and development vision. While -within the guidelines of the vision plan- it provides a significant notable history of Barstow's heritage beginning in 1776, to present. I1169-1

Therein,
I would submit to this updated proposed General Specific Plan to allocate a *section* for economic development of 'Hub of the West' TOURISM featuring building a convention center, establishing a future war museum, and provisioning its currently established (as listed below) entities. I1169-2

This tourism section and/or provision would additionally encapsulate the specific plans roadmap for transforming
"*the City and its people honor its past while forging a dynamic future, creating a complete community where residents thrive, visitors [from all over the world] discover, and businesses flourish*". I1169-3

Thank you for providing an opportunity for submissions.

Respectfully,
Sheila Compton
Barstow Quality Inn
Business Development

10 miles of downtown Route 66 and historical motels
Route 66 Murals
Route 66 Mother Road Museum
Harvey House
Slash X Ranch
Rainbow Basin
Goldstone Nasa Deep Space

Ft. Irwin Box Tours
Ft. Irwin Painted Rocks
MCLB portion of Route 66
Elmer's Bottle Tree Ranch
Delores Lake Park?
Mojave River Valley Museum
Barstow Station
American petroglyphs in Black Mountain Rock District near 1st street bridge
Del Taco on 1st street
Western American Rail Museum
Calico Ghost Town
Skyline Drive-In
Desert Discovery Center
Pisgah Crater

I1169-5
cont'd

RESPONSE TO COMMENT LETTER I1169, SHEILA COMPTON

I1169-1 through 5 Thank you for your comment. While the comment does not raise any issue regarding the Draft EIR, it is provided in the Final EIR for the decision makers.

COMMENT LETTER I1170

FORMAL LETTER

Adbrek Investments, LLC
27943 Sunset Ct
Helendale, CA 92342

Date: December 15, 2025

Via Email and Certified Mail

City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

Re: Tentative Tract Map #18446
APNs: 0421-133-32-0000, 0421-133-33-0000, 0421-133-35-0000
Formal Notice of Substantial, Continuous Work and Preservation of Vested Rights

Dear Barstow City Attorney, City Manager, City Mayor, and Community Development Director,

This letter is submitted on behalf of Adbrek Investments, LLC, to formally and unequivocally document the substantial, continuous, and good-faith work performed on the above-referenced project, and to place the City on notice of the owners' vested rights and legal protections arising from that work.

In accordance with the fact that the general plan amendment is up for review effective November 2025. We would like this letter entered into the record opposing any change to the area that is designated residential including the land between our project and the existing residential community that is already built out. I1170-1

We have been informed that the area may potentially be considered for business park in 2026 by vote of the City Council in the adoption of a new general plan, recommended and up for review currently.

We would respectfully request and submit this letter for your consideration and review, since so much effort has gone into bringing this project to life, in order to provide the Barstow BNSF project housing as well as the local community.

Substantial Investment and Continuous Effort

To date, in excess of One Million Dollars ($1,000,000) has been expended on this project. Further, over five hundred (500) documented man-hours have been devoted within the last ninety (90) days alone, involving engineers, construction managers, utility providers, consultants, and third-party experts. I1170-2

These efforts are not speculative, preparatory, or nominal in nature. They constitute material, necessary, and project-specific actions undertaken in reliance on existing zoning, approvals, and the City's continued recognition of Tentative Tract Map #18446 as active and valid. I1170-2 cont'd

Scope of Work Performed

Utility Coordination and Infrastructure Alignment

- Extensive coordination with Southern California Edison to recalibrate construction sequencing and high-voltage service delivery in compliance with required electrical vault construction.
- Ongoing engagement with Southwest Gas to secure and reconcile natural gas credits for each residence, consistent with evolving federal and state policy shifts supporting gas infrastructure. I1170-3
- Coordination with Frontier Communications for underground communications, including fiber-optic, high-speed internet, and 4G/5G infrastructure essential to modern residential development.

Third-Party Construction Management and Financial Reconciliation

- **Moot Development (Horizontal Construction):**
    - Detailed research and confirmation of construction scope
    - Finished-lot cost analyses
    - Comprehensive cost breakdowns and lender-ready estimates
    - Financial reconciliation for underwriting and funding purposes I1170-4
- **IMA Construction Management (Vertical Construction):**
    - Structural scope confirmation
    - Vertical construction cost modeling
    - Lender estimates and reconciliation analyses

On-Site Physical Work

- Installation of seven (7) individual electrical panels on residential structures.
- Completion of weed abatement across the project site.
- Phase 1 grading of land and areas between and surrounding residential units.
- Potholing to verify location of gas lines for Southwest Gas.
- Continued on-site security guard and fencing for the security and preservation of the development, structures, and community.

I1170-4 cont'd

Expert Verification and Evidentiary Support

The work outlined above is supported by countless professionals and subject-matter experts, including utility representatives, construction managers, engineers, and financial consultants. Each can independently attest to the time, effort, expense, and continuity of work performed.

I1170-5

All activities are fully documented and can be substantiated through correspondence, reports, invoices, schedules, expert declarations, and third-party confirmations.

Legal Reliance and Preservation of Rights

Adbrek Investments and its investors have proceeded in reasonable and documented reliance on existing zoning, entitlements, and City confirmations. Any action that would impair, modify, suspend, or invalidate those rights despite the substantial work performed would constitute material prejudice, raise serious vested-rights, estoppel, and due-process concerns, and expose the City to significant legal risk.

I1170-6

Accordingly, all rights, remedies, and causes of action whether at law or in equity, are expressly preserved.

Project is and has been Active

This project has not been abandoned, paused, or neglected. It has been actively advanced, at significant cost, through sustained professional effort and reliance on the City's approvals. Market-wide financing challenges do not negate these facts, nor do they diminish the legal protections that arise from them.

I1170-7

We look forward to continuing to work with the City in good faith and as a partner to bring quality and much needed housing to the community. We are making every effort to build out the development as quickly as possible. The expiration of the tract map would effectively nullify all the hard work and investment that has been made by Adbrek Investments, LLC over the past 5

years. We trust the City will give this matter the seriousness it warrants and continue to recognize the active and valid status of Tentative Tract Map #18446. I1170-7 cont'd

Respectfully,

Michael Knight
Managing Partner
Adbrek Investments, LLC

RESPONSE TO COMMENT LETTER I1170, MICHAEL KNIGHT (ADBREK INVESTMENTS)

I1170-1 through 7 The comment does not raise issues regarding the Project's physical environmental impacts or the Draft EIR's adequacy, and therefore it does not require a substantive response under CEQA. Nevertheless, the information has been provided in this Final EIR for consideration by the decision makers; see **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER I1173

I1173

BIG Project Transparency

Mart Family <deemart43@yahoo.com>

Tue 12/30/2025 7:38 PM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

[NOTICE: THIS IS AN EXTERNAL EMAIL]
Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!

Caution! This message was sent from outside your organization.

It has been stated that the BIG project will bring 20,000 direct and indirect jobs to Barstow However, on Nov. 19th, 2025, at a community meeting with BNSF, Lena Kent stated the proposed intermodal yard would have 5,375 employees. There needs to be transparency with the number of jobs the BIG Project would bring directly to the Barstow community and surrounding areas. I1173-1

1) How many of these jobs would be permanent full time positions in Barstow?
2) How many would be permanent part time positions in Barstow?
3) How many would be temporary full time jobs in Barstow?
4) How many would be temporary part time jobs in Barstow?
5) How many indirect jobs; and, how many of those are permanent, temporary, full time, part time? I1173-2

The public needs a truthful breakdown. How big is the proposed BIG Project when it comes to lasting local employment? I1173-3

Respectfully,
DM

Yahoo Mail: Search, Organize, Conquer

RESPONSES TO COMMENT LETTER I1173, MART FAMILY

I1173-1 **Draft EIR Section 3.0: Project Description** estimates that BIG would create nearly 16,000 direct, indirect and induced jobs (page 3-5). **Draft EIR Table 3-12: Estimated Employment – BIG** (page 3-51) breaks down jobs by category and whether Direct (On-Site) or Indirect/ Induced (Off-Site) (page 3-51). **Draft EIR Section 5.13: Population and Housing** provides additional discussion on the estimate of new direct jobs generated by BIG operations with approximately 5,373 new direct jobs within the City by 2048 (page 5.13-46). BIG proposes new employment-generating operational land uses (i.e., a rail yard with intermodal and block swap yard, a transload warehouse center, and a solar farm). When considering the additional 10,300 indirect and induced jobs, BIG operations would generate approximately 15,673 additional jobs by 2048; see **Draft EIR Table 3-12** (page 3-51).

I1173-2 As identified in **Draft EIR Table 3-12: Estimated Employment - BIG** (page 3-51), the total direct jobs estimate during operations by Horizon Year 2048 is 5,373. Of the 5,373 total operational direct jobs, we cannot determine at the time of publication the exact breakdown of permanent full-time, permanent part-time, temporary full-time, and temporary part-time. During the construction period, as identified in **Draft EIR Table 3-12: Estimated Employment - BIG** (page 3-51), we can assume that construction of the rail yard and transload warehouse center that approximately 8,188 jobs would be temporary full-time job equivalents. Furthermore, of the 10,300 total indirect/induced jobs during the operations period by Horizon Year 2048, we are also unable to determine the exact breakdown of permanent full-time, permanent part-time, temporary full-time, and temporary part-time. During the construction period, however, we can assume that the approximately 17,693 jobs that are indirect and induced would be temporary full-time job equivalents.

I1173-3 **Response I1173-1** and **I1173-2** provide a breakdown of job projections and references **Draft EIR Section 3.0: Project Description** and **Draft EIR Section 5.13: Population and Housing**. As discussed in **Responses I1173-1** and **I1173-2**, **Draft EIR Table 3-12: Estimated Employment - BIG** (page 3-51) identifies jobs through phases (construction, opening year 2028, interim year 2033, and horizon year 2048) and by category: direct (on-site) and indirect/induced (off-site). Direct jobs include work on the rail yard and transload warehouse center. Indirect jobs are linked to spending across construction and operating activity linked to BIG, including purchases of concrete, building mechanical systems, and other forms of corporate spending. Induced jobs are generated through the wages that are created by BIG and subsequently re-spent in the regional economy (e.g., purchases that are sustained through earnings from direct impacts would be included in this category).

Draft EIR Appendix 5.11 BIG-1: Economic and Fiscal Impact Analysis provides an economic impact analysis of estimated jobs, earnings, and total sale/output for the City of Barstow, San Bernadino County, and the State of California for the following categories: direct impact, indirect impact, induced impact, and total impact. As estimated in **Draft EIR Appendix 5.11 BIG-1**, in the City of Barstow, approximately 6,000 direct impact jobs would be available

within the City of Barstow by 2048 from the rail yard and transload warehouse operations alone.

COMMENT LETTER I1174

I1174

Re: Extension of Draft Environmental Impact Report

From Diane Flores@Dee-Lux Realty <trustdee@aol.com>

Wed 12/31/2025 8:23 AM

To:Barstow General Plan Update <barstowgeneralplanupdate@public.govdelivery.com>; GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

[NOTICE: THIS IS AN EXTERNAL EMAIL]
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Caution! This message was sent from outside your organization.

I have a few questions to ask before submitting public comment. You may already have the answers so I would like to ask a few questions about the proposal of the new general plan. Can someone call me to discuss ? I1174-1

DIANE FLORES
DEE-LUX REALTY, INC.
608 Barstow Road, Barstow CA
760-256-4045
TRUSTDEE@AOL.COM
http://www.deeluxrealty.com
Tidbits of the High Desert
For Financing options **Mobile Homes** use link
https://apply.21stmortgage.com/?sretId=3718-1
"In the middle of difficulty lies opportunity." — Albert Einstein

On Wednesday, December 31, 2025 at 07:29:12 AM PST, Barstow General Plan Update <barstowgeneralplanupdate@public.govdelivery.com> wrote:

Good Morning -

The City of Barstow has extended the public comment period for written comments on the Draft Environmental Impact Report (DEIR) by one week to 5:00 p.m., Monday, January 12, 2026. The City encourages comments to be submitted electronically via email: generalplan@barstowca.org.

Click here to view the General Plan Update & Barstow International Gateway Environmental Impact Report

RESPONSE TO COMMENT LETTER I1174, DIANE FLORES

I1174-1 The City called the commenter on January 6, 2026, and left a voicemail. No follow up call was received from the commenter.

COMMENT LETTER I1176

Re: Public Comment / Question

GoGo Barstow <gogobarstow@gmail.com>

Wed 12/31/2025 9:59 AM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

[NOTICE: THIS IS AN EXTERNAL EMAIL]
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Question:
What process or policies are in place to ensure that the residents in Barstow will have the skills and opportunities to secure the jobs being created? I1176-1

Our students exiting high school, students in college and low income families need a clear path to these jobs and careers? I1176-2

I would like to see BNSF define the skills needed and have a career path with the college and relationship with the school district that allows our residents priority or reserves a portion of jobs for local hires. If it requires bringing in a local union, I would like to see that as well. I1176-3

The reality without this support would be more of our residents in poverty and an increase in property and violent crimes. If we build our town around the poor and not include them in our growth we will see them attempting to take it. I1176-4

RESPONSES TO COMMENT LETTER I1176, GOGOBARSTOW

I1176-1 BNSF is planning a partnership with Barstow Community College that would provide training to local job seekers. See also **Consolidated Response 04** concerning general non-CEQA issues.

The commentor inquires what process or policies are in place to ensure that the residents in Barstow will have the skills and opportunities to secure the jobs being created. The Draft General Plan proposes a number of policies to ensure Barstow residents have the skills and opportunity to access to new jobs projected as part of the BIG Specific Plan and General Plan, including:

- **PFS-2.4 Local workforce training.**
  Facilitate collaboration between Barstow Community College and major employers to provide occupational training for Barstow residents and workers.
- **Policy PFS-2.5 Local workforce priority.**
  Encourage major employers to establish and implement local workforce hiring preference policies.
- **Policy PFS-2.6 Lifelong learning and career advancement.**
  Advocate for the continued provision and expansion of educational programs available through Barstow Community College to support lifelong learning.

I1176-2 The comment pertaining to pathways to jobs and careers with BNSF is noted. See **Consolidated Response 04** concerning general non-CEQA issues.

I1176-3 The comment requesting skills needed for local BNSF career pathways and prioritizing local hires with BNSF is noted. See **Consolidated Response 04** concerning general non-CEQA issues.

I1176-4 The comment concerning poverty and the importance of BNSF supporting local residents is noted. See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER I1177

General plan update comment

I1177

Ed Ed <pilgrim011@icloud.com>

Wed 12/31/2025 10:17 AM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

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Caution! This message was sent from outside your organization.

To whom it may concern,

I am writing to express my sincere gratitude for taking the time to explain the upcoming zoning update as it pertains to my properties, APN #0424-132-53-0-000 and APN #0424-132-54-0-000, located in Barstow, California. I1177-1

I am interested in requesting that these two parcels be rezoned from low density residential to single-family residential in the upcoming zoning update, which I understand is anticipated for implementation in 2025-2026, GOD willing. I1177-2

Thank you again for your assistance. I look forward to your response.

Respectfully,

Ed Burquez

310-728-9430

RESPONSE TO COMMENT LETTER I1177, LYN SCHRADER

I1177-1 through 3 While the comment does not raise questions concerning the adequacy or conclusions in the Draft EIR, the information has been provided in this Final EIR for consideration by the decision makers; see **Consolidated Response 04** concerning non-CEQA issues.

COMMENT LETTER I1178

I1178

DEIR Comment Extension

John Golden <johnnymoto911@yahoo.com>

Wed 12/31/2025 1:17 PM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>; Yolanda Reynolds <yoreynolds69@icloud.com>;

[NOTICE: THIS IS AN EXTERNAL EMAIL]
Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!

Caution! This message was sent from outside your organization.

To Whom It May Concern,

I am writing to express profound concern regarding the proposed railway development and its potential impact on our community's essential access routes. The current plans, which appear to necessitate the closure or significant alteration of primary access, pose an immediate and severe threat to our local economy, residents' quality of life, public safety, and property values. I1178-1

The direct accessibility currently enjoyed by local businesses, including our gas station, bar, and U-Haul rental service, is absolutely vital for their continued operation and profitability. Many patrons, particularly those passing through from the highway, rely on convenient access and will undoubtedly bypass our establishments if a lengthy detour becomes necessary. This change will directly lead to a drastic reduction in customer traffic and revenue, jeopardizing the economic stability of these businesses and potentially leading to closures and job losses within our community. I1178-2

Furthermore, the disruption will severely inconvenience our residents. As a community with a significant retirement population, ease of access for daily necessities, medical appointments, and social engagements is paramount. Imposing extended travel routes would create undue hardship, diminishing the quality of life for many, including local BNSF employees who reside here. I1178-3

Perhaps the most critical concern is the undeniable impact on public safety. Extended response times for emergency services – ambulances, fire departments, and law enforcement – due to a primary access route closure could have catastrophic consequences in the event of medical emergencies, fires, or public safety incidents. Moreover, alternative routes are often less robust, potentially vulnerable to washouts during inclement weather, or blockages due to accidents, which could completely isolate our community during critical times. This is an unacceptable risk. I1178-4

Finally, the potential depreciation of local property values is a significant worry. Direct and efficient access is a key factor in real estate valuation. A perceived reduction in accessibility will undoubtedly negatively impact the market value of homes and businesses throughout our area. I1178-5

We strongly urge you to reconsider the current development approach and prioritize the construction of an overpass or bridge to maintain essential community access. This is not merely a convenience; it is a fundamental necessity for the continued viability and safety of our community. We understand that budget considerations are important, but sacrificing the long-term well-being and security of a community for short-term savings is unacceptable. I1178-6

The community is prepared to explore all available avenues to ensure this critical infrastructure is built. There is serious and widespread discussion regarding potential legal action, with a local attorney actively assessing the viability of a class-action lawsuit. While no one desires protracted legal battles, the community is united in its resolve to protect its interests and ensure the bridge is constructed. We implore you to engage constructively with local stakeholders to find a collaborative solution, such as exploring bond measures or other funding mechanisms, to facilitate the construction of this vital piece of infrastructure. Ignoring these concerns will not only lead to years of costly and time-consuming legal entanglement but will ultimately fail to negate the eventual, undeniable need for such a bridge. I1178-7

Sincerely,

John Golden

RESPONSE TO COMMENT LETTER I1178, JOHN GOLDEN

I1178-1 See **Consolidated Response 06-02** concerning the role of social and economic issues under CEQA, **Consolidated Response 06-04** concerning quality of life, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 06-05** concerning decreased property values.

I1178-2 This comment does not clearly specify what "lengthy detour" will become necessary. Concerning construction detours, see **Response I1675-43** concerning the Lenwood Channel Bridge and impacts from BIG construction activities and construction traffic on adjoining and nearby roadways and land uses. See also **Consolidated Response 06-02** concerning the role of social and economic issues under CEQA.

I1178-3 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 06-04** concerning quality of life.

I1178-4 See **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings. See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays and **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings.

I1178-5 See **Consolidated Response 10-09** concerning the increased rail activity's effects on traffic delay, and decreased property values, **Consolidated Response-02** concerning the role of social and economic issues under CEQA, and **Consolidated Response 06-05** concerning decreased property values.

I1178-6 See **Consolidated Response 05** concerning feasible and enforceable mitigation and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1178-7 This comment, which is concerning legal action, is acknowledged. See **Consolidated Response 04** concerning general non-CEQA issues.

RESPONSES TO GROUP SUPPORT LETTER 3

The comment letters listed in the table below are letters of support received by the City. As the letters raised the same issues, a single response to the comments has been provided. In the table below, the letter number is followed by the commenter's name. In instances where the name was not legible or missing, the commenter's name is included as "Public Comment." The letters listed in the table below can all be found posted on the City's website at: https://www.barstowca.org/departments/community-development-department/planning/general-plan-update. As these comment letters repeatedly utilized a similar letter that raised the same issues, the responses applicable to all these comment letters have been provided in the first of these letters (i.e., I1182 Josh O'Neill) in the following pages.

I1182 Josh O'Neill,
I1183 Emely Koneil
I1184 James O'Neill
I1185 Samantha Pattico
I1186 Murlidhar Chapa
I1187 Charles Hutchinson
I1188 Hayley Hutton
I1189 Kyle Schaefer
I1190 Nicole Stewart
I1191 Hayley Hutton
I1192 Cory Stewart
I1193 Daniel Rodriguez
I1194-1 Daniel Davis
I1195 Tanya Wilson
I1196-1 Alex Misiura
I1197-1 Anthony DeMarco
I1198 John Mobley
I1199 James Solis
I1200 Michael Chacon
I1201 Mark Slack
I1202 Rich Dennison
I1203 Jason Murphy
I1204 Jenn Clegg
I1205 Rod Ridler
I1206-1 Kasey Moyer
I1207-1 Danny Ulibarri
I1208-1 Jaime LLamas
I1209-1 Rich Dennison
I1210 Phillip Smith
I1211 Ruben Villalobos
I1212 Edvard Tumbas
I1213 Bryan Vogele
I1214 Mitchel Riedell
I1215 Scott Rust
I1216 Miguel Angel Lopez
I1217 Keith Enriquez
I1218 Anthony Soto
I1219 Heather Santos
I1220 Manuel Astorga
I1221 David Majestic
I1222 William Hamm
I1223 Justin Taylor
I1224 Steve Sarian
I1225 Thomas Batts
I1226 Ethan Blackwood
I1227 Adam Richardson
I1228 Lena Kent
I1229 Katie Stephenson
I1230 Evan Jenkins
I1231 Jacob Gilmore
I1232 Matthew Howell
I1233 Robert Densmore
I1234 Jason Lamers

COMMENT LETTER I1182

Received by City of Barstow 12/31/25

I1182

Sent from: Josh O'Neill
Date: December 29, 2025, 6:42 AM
Email: joshoneill1313@gmail.com

City of Barstow, I'm writing to show my support for the Barstow International Gateway (BIG) project. As someone who works in the freight rail industry, I know how important it is to keep freight moving reliably. BIG will ease congestion at America's largest ports and improve freight movement across Southern California. This project also means real career opportunities. BIG will bring tens of thousands of new jobs, new training, and new pathways for people who want to build a long-term future in rail and logistics. Thank you for your time and leadership. BIG is a smart investment in our workforce, our supply chain, and the state as a whole. I encourage you to move it forward. Regards, Josh O'Neill

I1182-1

RESPONSE TO COMMENT LETTER I1182, JOSH O'NEILL

I1182-1 See **Consolidated Response-04** concerning non-CEQA issues.

COMMENT LETTER I1236

I1236

Big project

JUAN PEREZ <jmper020@verizon.net>

Thu 1/1/2026 10:28 AM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

[NOTICE: THIS IS AN EXTERNAL EMAIL]
Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!

Caution! This message was sent from outside your organization.

We are residents of silver lakes. We are totally against the closing of any entry streets in our community. And ask that the project lends enough money to assist in making things easier for us, not harder. Please make the money nesecery to do things right for all of us. I1236-1
Juan n Maria Perez

Sent from AOL on Android

RESPONSE TO COMMENT LETTER I1236, JUAN PEREZ

I1236-1 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings

COMMENT LETTER I1238

I1238

BNSF Project

angels4mel@aol.com

Thu 1/1/2026 4:09 PM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

[NOTICE: THIS IS AN EXTERNAL EMAIL]
Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!

Caution! This message was sent from outside your organization.

I'm hearing that the value of our houses will be decreasing!!! Is that true I would hope the value would increase but we need to have something good to offer, good quality air, water, scenery, easy access onto Sylvan, just to name a few good things!!!!we need good air quality!!!!!!! Very important!!!! I1238-1

Sent from the all new AOL app for iOS

RESPONSES TO COMMENT LETTER I1238, PUBLIC COMMENTER

I1238-1 See **Consolidated Response 04** concerning general non-CEQA issues, **Consolidated Response 06-04** concerning quality of life, **Consolidated Response 06-05** concerning decreased property values, and **Consolidated Response 10-09** concerning the increased rail activity's effects on traffic delay and decreased property values.

COMMENT LETTER I1243

I1243

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

RECEIVED
JAN 0 2 2026

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I1243-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I1243-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I1243-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I1243-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I1243-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I1243-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I1243-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I1243-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I1243-8

Sincerely,

Signature: Mi Negrete (You can remain anonymous if you prefer.)
Print Name: Miss Negrete
Mailing Address: P.O. Box 2843
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked. I1243-9

Trains stopped on tracks for an unknown amount of time!

RESPONSE TO COMMENT LETTER I1243, MILISA NEGRETE

I1243-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 06-04** concerning quality of life.

I1243-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I1243-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1243-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1243-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I1243-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1243-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation**, Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale

Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings.

I1243-8 See **Consolidated Response 04** concerning general non-CEQA issues, **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1243-9 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings.

COMMENT LETTER I1245

BIG DEIR – Silver Lakes/Helendale

I1245

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

RECEIVED
JAN 02 2026

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I1245-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I1245-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I1245-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I1245-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I1245-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I1245-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I1245-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I1245-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I1245-8

Sincerely,

Signature: _____ (You can remain anonymous if you prefer.)
Print Name: Pete Hughes
Mailing Address: P.O. Box 2883
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

NOTES:
ANY CONSTRUCTION ARE TO BE DOLE AT THE CROSSING WILL NEED A RAILROAD FLAGMAN, FOR PROTECTING WORKERS AS WELL AS ANY CAR TRAFFIC THIS KIND OF PROTECTION MUST BE DONE BY A FORM B - THIS MEANS THE FLAGMAN PUTS UP RED AND YELLOW FLAGS EAST AND WEST TO WARN ANY TRAIN OF CONSTRUCTION WORKERS AHEAD SO ALL TRAINS I EITHER DIRECTION MUST GET PERMISSION TO ENTER HIS FORM B - ALL TRAINS AT THAT POIN MUST BE AT RESTRICTED SPEED OF 10 MPH UNTIL CLEARED EAST & WEST A FORM -B' IS 2 MILES EAST & 2 MILES WEST I1245-9 I1245-10

RESPONSE TO COMMENT LETTER I1245, PETE NEGRETE

I1245-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 06-04** concerning quality of life.

I1245-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I1245-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1245-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1245-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I1245-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1245-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale

Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings.

I1245-8 See **Consolidated Response 04** concerning general non-CEQA issues, **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1245-9 This comment references requirements for work at at-grade crossings. Construction at at-grade crossings would follow applicable CPUC requirements and BNSF standards regarding construction near and within at-grade crossings.

I1245-10 See **Response I1245-9.**

COMMENT LETTER I1248

I1248

Re BNSF Barstow International Gateway Railyard

JANICE FERRONATO <janfer6@aol.com>

Sat 1/3/2026 2:12 PM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

[NOTICE: THIS IS AN EXTERNAL EMAIL]
Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!

Caution! This message was sent from outside your organization.

To whom it may concern,

We are Tony R and Janice L Ferronato. We live in Helendale, in the Silver Lakes Association. Our address is 27977 Golf Court.

We are writing out of concern for the BNSF Barstow International Gateway Railyard and how the traffic of the railroad tracks will affect our community. If traffic is stopped and blocked on the tracks leading into and out of our community, many lives can be in danger and at risk. I1248-1

By having long trains for many minutes blocking our access, or trains stopped on the tracks, blocking our access it would/could:

- Prevent emergency vehicles from entering or exiting our community, as all of our local hospitals are only accessible by going over these tracks to exit our community. Thus this could be a very dangerous situation and even result in loss of lives. I1248-2
- Prevent anyone going to ER in a timely manner in their own private vehicles, thus could potentially result in loss of life. I1248-3
- Prevent buses from entering and exiting our community. Many school children live out of our Silver Lakes community, but they do attend our schools. These children could be stuck either outside and not able to make it on time to school, or stuck inside and unable to make it home in a timely manner. I1248-4
- Make it much harder for those that commute out of our community for work, making it highly likely they will be late most days, or have to leave much earlier just to ensure they make it in a timely manner. I1248-5
- Make it much harder for those with Dr's appointments to make it to their schedule appointments on time I1248-6
- Make it much harder for those with any type of appointments to make it to their appointment in a timely manner. I1248-7
- Make it much harder for our Post Office to receive our mail. I1248-8
- Make it much harder for us to receive any goods and services through other carriers. I1248-9
- Make it harder for our stores and restaurants to receive their goods and services. I1248-10

- Cause large trucks to be stuck out, depending whatever the "solution" might be. I1248-11
- Cause the Real Estate value of our properties to decrease because of the above issues and people no longer wanting to live here because of these potential difficulties. I1248-12

You see we are a community. We need open access to these railroad tracks. Even though we do have our own Fire Department and paramedics, we do not have our own ambulance. We rely on outside ambulance services to transport anyone in an emergency situation. There are so many reasons why something needs to be done to ENSURE we have open access to these tracks. I1248-13

We sincerely hope that you will take our concerns seriously. I1248-14

Thank you for your time and attention to this matter!

Tony R and Janice L Ferronato
27977 Golf Court / PO Box 2143
Helendale, CA 92342
1/03/2026

RESPONSE TO COMMENT LETTER I1248, JANICE FERRONATO

I1248-1 through 11 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1248-12 See **Consolidated Response 06-02** concerning the role of social and economic issues under CEQA, **Consolidated Response 06-05** concerning decreased property values; **Consolidated Response 06** concerning potential effects on communities; and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community. See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 10-09** concerning the increased rail activity's effects on traffic delay and decreased property values.

I1248-13 See **Consolidated Response 06-03** concerning community safety; **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community; **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings; and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I1248-14 See **Responses I248-1** through **I248-13**. See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

COMMENT LETTER I1249

I1249

January 2, 2026 CEQA Compliance dEIR Response

To the City of Barstow, Planners, BNSF, and Agencies:

CEQA—the California Environmental Quality Act—requires state and local agencies to consider environmental consequences before approving projects. Its mission is fundamentally about disclosure, informed decision-making, and public participation.

A Draft Environmental Impact Report is CEQA's primary tool for fulfilling that mission. According to CEQA guidance:

- It must analyze the environmental effects of the proposed project.
- It must identify ways to reduce or avoid environmental damage (mitigation measures).
- It must evaluate alternatives.
- It must disclose significant impacts that cannot be avoided, cumulative impacts, and growth-inducing impacts.
- It must be available for public review and comment, which is a core part of CEQA's purpose: to inform decision-makers and involve the public.

I1249-1

This requires transparency**, accountability, and environmental protections before a project is approved.**

We are quickly approaching the **deadline for the end of the comment period (now January 12th, 5 p.m.)**

The deeper I read, the more I whole-hearted believe that the General Plan Update and the dEIR for the Barstow International Gateway Project **is NOT prepared for forward advancement due to:**

I1249-2

- **NOT FULLY DISCLOSING IMPACTS ON ADJACENT RESIDENTS.** The Sylvan Ave Community (Sylvan Ave., Amaryllis, Ivy, Prarie, Gazana, Osage, and Spinet Streets).

- **Lacking proper identification, raises the CEQA consideration for CEQA REQUIRED MITIGATIONS for the above-named parcels.**

I1249-3

- **Lacking required analysis of alternatives that REDUCE impacts on the Sylvan Ave Community.**

I1249-4

1. Does this dEIR interpret and fully describe what it means to live next to the BNSF International Gateway Project?

In my opinion, NO. The data anaylsis collected does not look at the Sylvan Ave Community.

✓ Isn't this a CEQA failure?

I1249-5

2. Does it quantify the real-world impacts on our health, homes, safety, or lifestyle?

In my opinion, NO. Identifying "significant, unavoidable" impacts is not sufficent as data omits acknowledging or identifying the long term harm of the Sylvan Ave Community.

I1249-6

- ✓ The sensitive receptors are our human nervous system, our respiratory system, our cardiac system, our private water well systems, our home structure and property values, and our calm - rural - outdoor way of lifestyle as long time generational existing residents having spacious land parcels, views and wildlife.

I1249-6 cont.

3. Does the dEIR propose real, enforceable mitigations? Or vague promises to the City of Barstow?

In my opinion, NO. All are vague promises. We need measurable, on-going, enforceable mitigations.

- ✓ There are no mitigations offered to the Sylvan Ave Community.
- ✓ How could there be if we are not even considered?
- ✓ We are on the outskirts of San Bernardino County. The County is too large for them to consider us important. The dEIR states that this is primarily vacant land but fails to identify the communities nearby (the Sylvan Ave Community), it weakly refers to the Country Club Community and the Silverlakes Community.
- ✓ We are not constituents of The City of Barstow. **We need a voice**.
- ✓ Doesn't this make the dEIR inadequate?

I1249-7

4. Does it fully analyze and provide alternative protections for the Sylvan Ave Community?

In my opinion, NO. **Stating "significantly and unavoidably" impacts without supporting evidence** that mitigations can be provided to protect the residents is not submitted.

- ✓ Isn't this a CEQA flaw and inadequacy?

I1249-8

California Environmental Quality Act is to protect resident's vulnerability, as we are the people who live the closest to the impacts.

Our lived experiences, the proximity to the 4,700 acre idustrial project with new rail lines/swap yards/warehouses, our home's vulnerability, our health, Route 66 and wildlife stewardship are evidences that CEQA, the City of Barstow, the County of San Bernardino and BNSF and all Agencies need to consider.

I1249-9

Please assist us in confronting **impacts that are being ingnored.**

1. I request recirculation of the dEIR with Sylvan Ave Community parcels to be included in the draft environmental report.

I1249-10

2. I request major revisions to provide transparency and accountability for the Barstow General Plan and BNSF International Gateway project that are measurable, enforceable and on-going with a specialized team to monitor along with Sylvan Ave Community residents.

I1249-11

3. I request that the Sylvan Ave Community receive full mitigation measures to protect our health, safety, homes, and way of living.

I1249-12

4. If this project has a regional impact and if the burden of this mega development will be carried by my community, we deserve to be protected or given options.

I1249-13

City of Barstow, your marketing slogan has been "to create a healthier Barstow for everyone" since the General Plan Update Town Hall Meetings. I respectfully request that you ethically fulfill that statement.

I respectfully request that my letter of public comment be recorded for public record and concerns/questions be responded to in writing.

I will be submitting comment to several chapters of the dEIR to include: I1249-14

1. Noise and Vibrations (x3 submissions)
2. Air Quality
3. Hydrology
4. Aesthetics
5. Energy
6. Biological Resourses
7. Cultural Resources
8. Cummulative Effects

In Service,

Sherry Baily
Sylvan Ave Community Resident

RESPONSE TO COMMENT LETTER I1249, SHERRY BAILY

I1249-1 The commentor lists CEQA's requirements for a Draft EIR.

I1249-2 See **Consolidated Response-06** concerning potential effects on communities and **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community.

I1249-3 See **Consolidated Response 06-01** concerning the geographic scope of the environmental analysis and definition of a study area. See **Consolidated Response 05** concerning feasible and enforceable mitigation.

I1249-4 See **Consolidated Response 09-11** concerning the consideration of alternatives to minimize impacts to the Sylvan Community.

I1249-5 See **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor and **Consolidated Response 06-01** concerning the geographic scope of the environmental analysis and definition of study area, which include the Sylvan Community.

I1249-6 The concerns expressed regarding health, safety, and lifestyle are acknowledged. The health and safety issues were analyzed in detail within the Draft EIR, including assessments of **Section 5.3 Air Quality, Section 5.12 Noise and Vibration, Section 5.14: Public Services and Recreation** and **Section 5.15: Transportation**, and other environmental factors, as well as consideration of alternatives and mitigation measures. Where impacts were determined to be significant and unavoidable, this is clearly identified in the document, along with an explanation of why certain mitigation measures may be infeasible. The issues raised in this comment, except for human nervous and cardiac system issues (which are not an environmental topic (see **Consolidated Response 04** concerning general non-CEQA issues)) were analyzed in detail within the Draft EIR.

See **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor within **Draft EIR Section 5.3: Air Quality** and **Section 5.12 Noise and Vibration,** and the corresponding potential impacts. Also see **Consolidated Response 09-07** concerning consideration of impacts to Sylvan Community private water wells, **Consolidated Response 06-04** concerning quality of life; **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis; **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses, **Consolidated Response-02** concerning the role of social and economic issues under CEQA, **Consolidated Response 06-05** concerning decreased property values, See **Consolidated Response 06-03** concerning community safety, **Consolidated Response 06-05** concerning decreased property values, **Consolidated Response 10-09** concerning the increased rail activity's effects on traffic delay and decreased property values, **Consolidated Response 09-07** concerning consideration of impacts to Sylvan Community private water wells, **Consolidated Response 09-05** concerning consideration of the Sylvan Community in the lighting analysis, **Consolidated Response 09-08** concerning consideration of Sylvan

Community biological resources, and **Consolidated Response 06-01** concerning the geographic scope of the environmental analysis and definition of study area.

I1249-7 See **Final EIR Section 4.0**: **Mitigation Monitoring and Reporting Program** and **Draft EIR Section 1.0: Executive Summary Table 1-2: Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance after Mitigation — BIG** (page 1-43 to 1-94) for a list of the impact thresholds and mitigation measures proposed for BIG, along with implementation responsibility for each. As stated above, the Sylvan Community is identified within the study area for all sections of the **Draft EIR**, and as such is encompassed within applicable mitigation measures. As stated in **Consolidated Response 05** concerning feasible and enforceable mitigation, if the City approves BIG, all mitigation measures ultimately adopted by the City would be in the MMRP and would be enforceable.

I1249-8 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor, **Consolidated Response-06** concerning potential effects on communities, and **Consolidated Response 06-01** concerning the geographic scope of the environmental analysis and definition of a study area, which include the Sylvan Community. Mitigation measures are also listed in **Final EIR Section 4.0: Mitigation Monitoring and Reporting Program** and **Draft EIR Table 1-2: Summary of Environmental Impacts. Mitigation Measures, and Levels of Significance after Mitigation — BIG** (page 1-43 to 1-94)**.** Thus, proposed mitigation measures encompass potential impacts to the Sylvan Community as it is identified within the study areas for BIG.

I1249-9 See **Consolidated Response 06** concerning potential effects on communities; **Consolidated Response 06-01** concerning the geographic scope of the environmental analysis and definition of study area; **Consolidated Response 06-03** concerning community safety; **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community, **Consolidated Response 06-05** concerning decreased property values, **Consolidated Response 10-09** concerning the increased rail activity's effects on traffic delay and decreased property values, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials, and **Consolidated Response 09-08** concerning consideration of Sylvan Community biological resources.

I1249-10 See **Consolidated Response 01-02** concerning the Draft EIR public review period, **Consolidated Response 03** concerning recirculation of the Draft EIR**, Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 06-01** concerning the geographic scope of the environmental analysis and definition of study area.

I1249-11 See **Consolidated Response 06-01** concerning the geographic scope of the environmental analysis and definition of study area, **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 05-01** concerning requirements for

mitigation measures, **Consolidated Response 05-02** concerning feasibility, **Consolidated Response 05-04** concerning economic feasibility, **Consolidated Response 05-05** concerning mitigation enforceability, **Consolidated Response 05-06** concerning the feasibility of specific technology and other mitigation measures, and **Consolidated Response 12-03** concerning enforceability of the Project components and mitigation measures for the Project.

I1249-12 and 13 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 02** concerning significant and unavoidable impacts and the Statement of Overriding Considerations, **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 06-04** concerning quality of life, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials, and **Consolidated Response 14** concerning consideration of a range of reasonable alternatives.

I1249-14 See **Responses I1249-1** through **I1249-13**, **Consolidated Response 01-01** concerning community outreach, **Consolidated Response 01-02** concerning the Draft EIR public review period, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community.

COMMENT LETTER I1250

I1250

BNSF PROJECT

angels4mel@aol.com

Sun 1/4/2026 3:10 PM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

[NOTICE: THIS IS AN EXTERNAL EMAIL]
Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!.

Caution! This message was sent from outside your organization.

Sent from the all new AOL app for iOS no

I agree with Sherry Baily on all the issues that are not be addressed. There seems to be many concerns that I wouldn't even think about if I hadn't read Sherry's concerns. That might be something that all of you are counting on, that we don't know what is going on or understand it all. That's why I asked you before would you all your mother , grandmother or your children to live here and go through what we in Sylvan Community will be going through or experiencing. I would recommend answering as many if not all our concerns before subjecting us to this project. Thank you for reading this. I1250-1

Carmela Gonzalez, I live on Osage in The Sylvan Community!

RESPONSES TO COMMENT LETTER I1250, CARMELA GONZALEZ

I1250-1 Public engagement in the CEQA process is an essential part of environmental review, and involvement from community members is greatly appreciated. However, the comment does not address the adequacy of the Draft EIR for this proposed Project, and thus no further response is needed. See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community.

COMMENT LETTER I1295

I1295

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

RECEIVED
JAN 05 2026

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I1295-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I1295-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I1295-3

- **Emergency Access:** Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I1295-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I1295-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I1295-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I1295-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I1295-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I1295-8

Sincerely,

Signature: Susan L Bennett (You can remain anonymous if you prefer.)
Print Name: Susan L. Bennett
Mailing Address: P.O. Box 2341
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

This poses a huge problem in emergency situations. We have an aging community and many travel a distance for jobs. The traffic is another concern. I1295-9

RESPONSE TO COMMENT LETTER I1295, SUSAN BENNETT

I1295-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings accessibility, and **Consolidated Response 06-04** concerning quality of life.

I1295-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I1295-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1295-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1295-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I1295-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1295-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade

separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at the Silver Lakes/Helendale Community at-grade crossings.

I1295-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1295-9 See **Consolidated Response 06-03** concerning community safety; **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings; **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings.

COMMENT LETTER I1298

Dec 2025

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

I1298

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

RECEIVED
JAN 05 2026

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I1298-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I1298-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I1298-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I1298-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I1298-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I1298-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I1298-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I1298-7 cont.

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I1298-8

Sincerely,

Signature: Deana Padgett (You can remain anonymous if you prefer.)
Print Name: Deana Padgett
Mailing Address: 26250 Fleet Lane 2366
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

Many times the train has stopped ON the tracks for up to 1 hour. Makes me late for my appointments! What if it was an emergency!
Deana Padgett I1298-9

RESPONSE TO COMMENT LETTER I1298, DEANA PADGETT

I1298-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings accessibility, and **Consolidated Response 06-04** concerning quality of life.

I1298-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I1298-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1298-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1298-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I1298-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1298-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade

separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at the Silver Lakes/Helendale Community at-grade crossings.

I1298-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1298-9 See **Consolidated Response 06-03** concerning community safety; **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings; **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

COMMENT LETTER 1299

 I1299

Written Comment on Draft EIR – Opposition to Rezoning of Residential Property to Business Park

Michael Knight <Michael.Knight@c21desertrock.com>

Mon 1/5/2026 4:57 PM

To: GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

Cc: coderplustech@gmail.com <coderplustech@gmail.com>; robert kramer <r_kramer_68@yahoo.com>; jaenbaldwin <jaenbaldwin@aol.com>; Jaen Baldwin <jaenbaldwin@gmail.com>; John Thomas <jthomas@gemcorp.com>; Angela Knight <Angela.Knight@c21desertrock.com>; Heidy Riley <hriley@barstowca.org>; Michael Knight <Michael.Knight@c21desertrock.com>;

1 attachments (66 KB)

Barstow.pdf;

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Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!

Caution! This message was sent from outside your organization.

To Whom It May Concern,

I am writing to formally submit written comments regarding the Draft EIR for the City of Barstow's General Plan Update and the Barstow International Gateway Project. I1299-1

Our investment group owns property, commonly known as "Liberty Ridge", within the planning area that is proposed to be rezoned from its current residential designation to Business Park. The subject property is presently zoned residential, is fully entitled, and is approved for the construction of up to 100 single-family homes. Seven (7) homes are already partially constructed on the site. In addition, the surrounding vacant parcels are likewise well-suited for residential development. I1299-2

We strongly oppose the proposed rezoning of our property and the neighboring residentially suitable parcels from residential to Business Park. I1299-3

Barstow, like much of California, is experiencing a significant and well-documented shortage of housing. New housing—particularly entitled, shovel-ready residential projects—is critically needed to support local workforce stability, economic growth, and long-term community sustainability. The subject properties represent an immediate and practical opportunity to deliver new housing without the need for extensive new entitlements or land use changes. I1299-4

Rezoning these parcels to Business Park would eliminate already-approved residential capacity, undermine substantial prior investment, and delay or prevent the delivery of much-needed homes. This change would also be inconsistent with the City's stated goals of supporting housing availability and balanced growth, and it fails to adequately consider reasonable alternatives that preserve residential land while still allowing the City to pursue its economic development objectives elsewhere. I1299-5

Furthermore, the Draft EIR does not appear to sufficiently analyze the environmental, economic, and social impacts associated with the loss of approved residential development, nor does it adequately address feasible I1299-6

alternatives that would retain residential zoning for these properties. Removing residentially entitled land in favor of speculative future commercial or industrial use poses long-term risks to housing affordability and community stability. I1299-6 cont'd

For these reasons, we respectfully request that the City revise the General Plan Update and the Barstow International Gateway Project to:

- Retain the existing residential zoning on our property and the surrounding residentially appropriate vacant lots;
- Recognize and preserve already-approved residential entitlements;
- Fully analyze and disclose the impacts of reducing residential land supply in the Draft EIR; and
- Consider reasonable alternatives that balance economic development goals without sacrificing critically needed housing.

I1299-7

Please include this letter as part of the official administrative record for the Draft EIR. I1299-8

Thank you for your consideration of these comments and for the opportunity to participate in the public review process.

Sincerely,

Michael Knight

RESPONSE TO COMMENT LETTER I1299, MICHAEL KNIGHT

I1299-1 The comment is an introductory comment to the specific comments provided below. See **Consolidated Response 04** concerning general non-CEQA issues.

I1299-2 As discussed in **Draft EIR Section 5.11: Land Use and Planning** (page 5.11-47), an existing land use would be allowed to continue as a pre-existing non-conforming use pursuant to Barstow Code § 19.00.060; subject to all applicable requirements for maintaining a vested right under applicable law, including the Subdivision Map Act and its requirements governing the validity period for tentative tract maps not yet completed by approval of a final map. This would allow any lawfully vested pre-existing land use to continue in perpetuity, and can be sold, transferred, etc. No changes to the Draft EIR are required.

I1299-3 This comment indicating opposition to the rezoning of parcels is noted for the record and will be provided to the decision makers for review and consideration.

I1299-4 See **Draft EIR Section 5.13: Population and Housing** concerning potential impacts to the housing stock and workforce. See **Response I299-2** and **Consolidated Response 04** concerning general non-CEQA issues.

I1299-5 See **Responses I1299-2** and **I1299-4** above.

I1299-6 See **Responses I1299-2** and **I1299-4** above, **Consolidated Response 06-02** concerning the role of social and economic issues under CEQA, **Consolidated Response 06-05** concerning decreased property values, **Consolidated Response 10-09** concerning the increased rail activity's effects on traffic delay and decreased property values, **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 06-04** concerning quality of life, **Consolidated Response 14** concerning consideration of a range of reasonable alternatives, and **Consolidated Response 09-11** concerning consideration of alternatives to minimize impacts to the Sylvan Community.

I1299-7 See **Responses I1299-2** and **I1299-4** above.

I1299-8 See **Responses I1299-1** through **I1299-7** and **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER I1300

I1300

BNSF

Terri Salerno <terrisalerno@gmail.com>

Mon 1/5/2026 6:54 PM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

[NOTICE: THIS IS AN EXTERNAL EMAIL]
Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!

Caution! This message was sent from outside your organization.

Please consider us folks who live in Helendale/Silver Lakes with the addition of additional trains and cargo cars.
I am a very-old-senior citizen who relies on emergency services quite often.

I1300-1

We need easy and quick access in and out of Silver Lakes.

Regards,
Theresa M Salerno
14351 Galleon Ln, Helendale, CA 92342
714-273-8479

RESPONSE TO COMMENT LETTER I1300, THERESA SALERNO

I1300-1 See **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

COMMENT LETTER I1301

Environmental Impact Report (DEIR) Draft

Sally Arnett <arnett8104@yahoo.com>

Tue 1/6/2026 7:17 AM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

[NOTICE: THIS IS AN EXTERNAL EMAIL]
Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!

Caution! This message was sent from outside your organization.

Hello
Is it possible to obtain a copy of tha handoiutrs in the Environmental Impact Report (DEIR) discussed in the link? There are key areas that I want to explore further and having a set of handouts would assist. I-1301-1
Thank you,
Sally Arnett
P.O. Box 695
Barsow, CA. 02312

RESPONSES TO COMMENT LETTER I1301, SALLY ARNETT

I1301-1 Copies of the handouts in the Draft EIR have been made available to view, download, and print from the following link: https://www.barstowca.org/departments/community-development-department/planning/barstowgeneralplanupdate-com/documents-for-public-review-download-ver1.

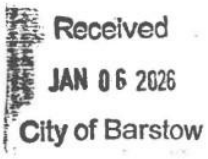
COMMENT LETTER I1305

I1305

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311



E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I1305-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I1305-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I1305-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I1305-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I1305-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I1305-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I1305-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I1305-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I1305-8

Sincerely,

Signature: Marilyn M Kohler (You can remain anonymous if you prefer.)
Print Name:
Mailing Address:
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

I have personally seen an EMR ambulance at a stopped crossing at the Vista site trying to go through with a patient on board they had evidentially just picked up here in Silver Lakes. I'm very concerned that it could be me or my husband in that ambulance one day! We need an exit to get out of here readily! People's lives are at stake here. This community are all fearful for what could happen to any one of us in an emergency situation, if we had no quick way of exiting to National Trails Hwy. Please do not overlook Silver Lakes! I1305-9

RESPONSE TO COMMENT LETTER I1305, MARILYN KOHLER

I1305-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings accessibility, and **Consolidated Response 06-04** concerning quality of life.

I1305-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I1305-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1305-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1305-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I1305-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1305-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade

separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at the Silver Lakes/Helendale Community at-grade crossings.

I1305-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1305-9 See **Consolidated Response 06-03** concerning community safety; **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings; **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

COMMENT LETTER I1306

I1306

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

Received
JAN 06 2026
City of Barstow

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I1306-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I1306-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I1306-3

- **Emergency Access:** Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I1306-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I1306-5
- **Cumulative Impacts:** Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I1306-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I1306-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I1306-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I1306-8

Sincerely,

Signature: Erich Kohler (You can remain anonymous if you prefer.)
Print Name: ERICH KOHLER
Mailing Address: 14726 SHENANDOAH LANE
Helendale, CA 92342 P.O. BOX 1619

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

Is the closure of "Vista Rd. to be a permanent situation? That would be an intolerable condition to put up with!
the greatest % of shops, stores, services etc. are located to the east of the 15 freeway and we would have to drive many miles extra if we are required to exit on Shadow Mountain Rd, take 395 south, thru "adelantro" and then turn east to the places mentioned. I1306-9

We are already afected by the increased # of trains, some of which slow down drastically when crossing Vista Rd, occasionally stopping on the road. this lengthens the response time for Police, Fire fighters & ambulances. this then increases danger, &/or loss to the people in need of these services! I1306-10

EK

RESPONSE TO COMMENT LETTER I1306, ERICH KOHLER

I1306-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings accessibility, and **Consolidated Response 06-04** concerning quality of life.

I1306-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I1306-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1306-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1306-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I1306-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1306-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade

separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at the Silver Lakes/Helendale Community at-grade crossings.

I1306-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1306-9 This comment mentions "the closure of Vista Rd." However, BIG does not propose closure of Vista Road or any other transportation improvements at this location.

I1306-10 See **Consolidated Response 06** concerning potential effects on communities; **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community; **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings; **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings.

COMMENT LETTER I1557

BIG DEIR – Silver Lakes/Helendale I1557

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Received
JAN 06 2026
City of Barstow

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I1557-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I1557-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I1557-3

- **Emergency Access:** Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I1557-4
- **Hazardous Materials:** Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I1557-5
- **Cumulative Impacts:** Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I1557-6
- **Mitigation Commitment:** Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I1557-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I1557-7 cont.

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I1557-8

Sincerely,

Signature: _____ (You can remain anonymous if you prefer.)
Print Name: M Antiporta
Mailing Address: PO Box 1436, #621
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

Simple breakdowns has led to a minimum of one hour delays. You should build the alternate route that was planned years ago (continue it!) BEFORE starting the BIG operations. I1557-9

RESPONSE TO COMMENT LETTER I1557, M. ANTIPORTA

I1557-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings accessibility, and **Consolidated Response 06-04** concerning quality of life.

I1557-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I1557-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1557-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1557-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I1557-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1557-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade

separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at the Silver Lakes/Helendale Community at-grade crossings.

I1557-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1557-9 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 05** concerning feasible and enforceable mitigation; **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community; **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings; and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

COMMENT LETTER I1558

I1558

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

Received
JAN 06 2026
City of Barstow

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I1558-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I1558-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I1558-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I1558-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I1558-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I1558-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I1558-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I1558-7 cont.

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I1558-8

Sincerely,

Signature: _____ (You can remain anonymous if you prefer.)
Print Name: Donna M Moranel
Mailing Address: P O Box 2845
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

School Buses waiting 10-20 minutes at a Rail Road Crossing is a safety Concern I1558-9

RESPONSE TO COMMENT LETTER I1558, DONA GRAMEL

I1558-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings accessibility, and **Consolidated Response 06-04** concerning quality of life.

I1558-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I1558-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1558-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1558-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I1558-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1558-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade

separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at the Silver Lakes/Helendale Community at-grade crossings.

I1558-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1558-9 See **Consolidated Response 06-03** concerning community safety; **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 10-04** concerning the increased rail activity's effects regarding traffic delays and school transportation needs at Silver Lakes/Helendale Community at-grade crossings.

COMMENT LETTER I1559

BIG DEIR – Silver Lakes/Helendale I1559

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

Received
JAN 06 2026
City of Barstow

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I1559-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I1559-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I1559-3

- **Emergency Access:** Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I1559-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I1559-5
- **Cumulative Impacts:** Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I1559-6
- **Mitigation Commitment:** Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I1559-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I1559-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I1559-8

Sincerely,

Signature: April Sparks (You can remain anonymous if you prefer.)
Print Name: April Sparks
Mailing Address: PO 302
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

While our community seems to be of little concern to the Railroad, the railroad is of major concern to us. In recent weeks we have had MULTIPLE Trains lose connectors to other train carts causing a major disruption to the entrance and exit of our community. As a community with many elderly and children, the blocking of the entrance/exit is of the most importance. Medical personnel would, and have in many instances been, delayed. To increase train traffic is not only morally wrong but inconsiderate to the lives in our community. Not to mention our community was not considered when making such decisions show poor planning, lack of responsibility and lack of consideration to the community in which many BNSF employees live. I1559-9

RESPONSE TO COMMENT LETTER I1559, APRIL SPARKS

I1559-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings accessibility, and **Consolidated Response 06-04** concerning quality of life.

I1559-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I1559-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1559-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1559-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I1559-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1559-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade

separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at the Silver Lakes/Helendale Community at-grade crossings.

I1559-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1559-9 See **Consolidated Response 06-03** concerning community safety; **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings; **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossing, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings; **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community; and **Consolidated Response 01** concerning community outreach and the Draft EIR public review period.

COMMENT LETTER I1560

I1560

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

Received
JAN 06 2026
City of Barstow

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I1560-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I1560-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I1560-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I1560-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I1560-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I1560-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I1560-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area.

I1560-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community.

I1560-8

Sincerely,

Signature: [signature] (You can remain anonymous if you prefer.)
Print Name: Jim Granger
Mailing Address: P.O. Box 2845
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

one million more sea containers passing Silver Lakes (per the Big DEIR)! That's 2,736 more per day making 27 miles of trains per day. This mush train traffic is compounded by the added rail maintenance on two tracks. Pepple will die at the Vista rd @ grade crossing by trying to beat the trains or cross in between trains. Silver Lakes need a bridge over the rail road tracks!

I1560-9

RESPONSE TO COMMENT LETTER I1560, JIM GRANGER

I1560-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings accessibility, and **Consolidated Response 06-04** concerning quality of life.

I1560-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I1560-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1560-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1560-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I1560-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1560-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade

separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at the Silver Lakes/Helendale Community at-grade crossings.

I1560-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1560-9 See **Consolidated Response 06-03** concerning community safety; **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings; **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings; **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community; and **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

COMMENT LETTER I1601

BIG DEIR – Silver Lakes/Helendale I1601

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026



Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I1601-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I1601-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I1601-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I1601-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I1601-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I1601-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I1601-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I1601-7 cont'd.

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I1601-8

Sincerely,

Signature: RMS Student (You can remain anonymous if you prefer.)
Print Name:
Mailing Address:
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked. Some concerns ive had would be when their was a high speed chase and there was a bus in the way! I1601-9

RESPONSE TO COMMENT LETTER I1601, PUBLIC COMMENTER 391

I1601-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings accessibility, and **Consolidated Response 06-04** concerning quality of life.

I1601-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I1601-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1601-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1601-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I1601-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1601-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade

separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at the Silver Lakes/Helendale Community at-grade crossings.

I1601-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1601-9 See **Consolidated Response 06-03** concerning community safety; **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings; **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings; **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings; and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

COMMENT LETTER I1609

BIG DEIR – Silver Lakes/Helendale

I1609

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026



Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I1609-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I1609-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I1609-3

- **Emergency Access:** Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I1609-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I1609-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I1609-6
- **Mitigation Commitment:** Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I1609-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I1609-7 cont.

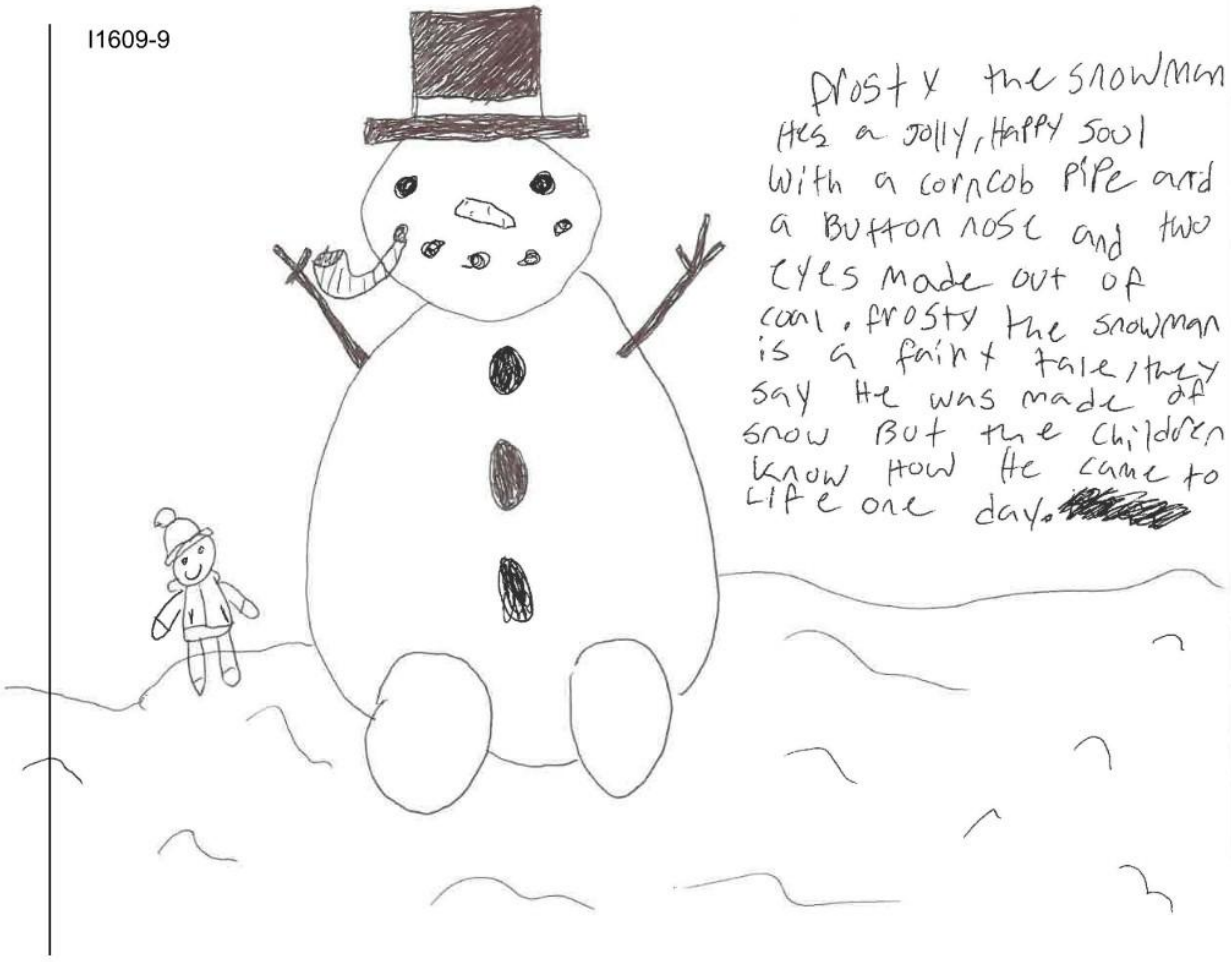
Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I1609-8

Sincerely,

Signature: Hailey Woods (You can remain anonymous if you prefer.)
Print Name: Hailey Woods
Mailing Address:
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

I1609-9



RESPONSE TO COMMENT LETTER I1609, HAILEY WOODS

I1609-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings accessibility, and **Consolidated Response 06-04** concerning quality of life.

I1609-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I1609-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1609-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1609-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I1609-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1609-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade

separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at the Silver Lakes/Helendale Community at-grade crossings.

I1609-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1609-9 See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER I1645

BIG DEIR – Silver Lakes/Helendale

I1645

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

City of Barstow
Received:
JAN 06 2026
Initial:
City Clerk Services

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I1645-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I1645-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I1645-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I1645-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I1645-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I1645-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I1645-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I1645-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I1645-8

Sincerely,

Signature: Melissa Gutierrez (You can remain anonymous if you prefer.)
Print Name: Melissa Gutierrez
Mailing Address:
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

Waiting ages to cross that railroad can sometimes take up to 3-7 or more. We have firefighters in helendale, blocking or increasing the wait time could be lethal and putting lives in danger. This decision could cost lives & would undenbtly be reckless. I1645-9

As well as people with jobs, being constantly late could result in people losing their jobs,

RESPONSE TO COMMENT LETTER I1645, MELISSA GUTIERREZ

I1645-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings accessibility, and **Consolidated Response 06-04** concerning quality of life.

I1645-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I1645-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1645-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1645-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I1645-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1645-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade

separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at the Silver Lakes/Helendale Community at-grade crossings.

I1645-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1645-9 See **Consolidated Response 06-03** concerning community safety; **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings; **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

COMMENT LETTER I1673

I1673

Concerns regarding BNSF project

Violeta Sardeson <lissetsardeson@gmail.com>

Tue 1/6/2026 6:21 PM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

[NOTICE: THIS IS AN EXTERNAL EMAIL]
Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!

Caution! This message was sent from outside your organization.

Dear Council members,

The BNSF BIG project should not be approved because it would permanently and irreversibly alter our environment, our community, and our way of life. Projects of this magnitude do not simply bring infrastructure; they bring increased noise, air pollution, traffic congestion, safety risks, and long-term environmental damage that local residents are forced to live with every day. I1673-1

If this project is truly as beneficial as it is being presented, a critical question must be asked: why have other cities refused it? Communities that have reviewed similar proposals have recognized that the long-term costs outweigh the short-term promises. Their decisions should serve as a warning, rather than something that is just ignored. I1673-2

Public safety must be the highest priority. Increased industrial rail activity raises serious concerns about hazardous materials, emergency response readiness, traffic delays, and the safety of families, schools, and first responders. These risks are not theoretical, they are real, and once the project is built, they cannot be undone. I1673-3

At its core, this is about accountability and fairness. Would decision-makers want this project built in their own neighborhoods, next to their homes, schools, and parks? If the answer is no, then it should not be imposed on this community. Residents should not be asked to sacrifice their health, safety, and quality of life for a project that primarily benefits outside interests. I1673-4

For these reasons, the BNSF BIG project should not be approved. I1673-5

Thank you for your time and consideration,

Lisset Sardeson

RESPONSE TO COMMENT LETTER I1673, LISSET SARDESON

I1673-1 See **Draft EIR Section 5.3: Air Quality**, **Section 5.9: Hazards and Wildfire**, **Section 5.12: Noise**, and **Section 5.15: Transportation**, regarding potential impacts associated with air pollution, public safety, noise, and traffic congestion. See **Consolidated Response 06-04** concerning quality of life.

I1673-2 See **Consolidated Response 04** concerning general non-CEQA issues.

I1673-3 See **Draft EIR Section 5.9: Hazards and Wildfire**, **Section 5.14: Public Services and Recreation**, and **Section 5.15: Transportation**, regarding potential impacts associated with hazardous materials, emergency response, traffic delays, and public safety. See **Consolidated Response 06-03** concerning community safety, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 08-02** concerning the increased rail activity's effects regarding traffic delays and potential crash hazards at at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 10-04** concerning the increased rail activity's effects regarding traffic delays and school transportation needs at Silver Lakes/Helendale Community at-grade crossings.

I1673-4 See **Consolidated Response 04** concerning general non-CEQA issues.

I1673-5 See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER I1674

Barstow International Gateway DEIR Comments

Lori DeRome <lorijderome@gmail.com>

Wed 1/7/2026 2:33 AM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

[NOTICE: THIS IS AN EXTERNAL EMAIL]
Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!

Caution! This message was sent from outside your organization.

Dear Mayor Silva and Council Members,

Thank you for the opportunity to voice our concerns regarding the Barstow International Gateway (BIG) project.

I moved to Silver Lakes (Helendale) nearly 8 years ago to escape the pollution, traffic, and chaos of LA County. For years I have truly appreciated the peaceful, quiet, slower pace of life here, the cleaner air, and the ease of commuting to work in Barstow via Route 66. I1674-1

I am concerned that, with the construction of the largest rail yard in the country just four miles from my community, the increase in diesel trains and trucks will have a significant negative impact on our air quality and ultimately our health. I request that the project plan consider the use of zero emission trucks and trains to help mitigate this problem. I1674-2

To reduce noise pollution from this proposed 4,700 acre industrial facility, I request considering construction of sound walls. We are well aware of the negative impact of loud noise and vibration on our human central nervous system... and many in our community and other neighboring communities have horses and other animals that are also particularly sensitive to sound. I1674-3

I anticipate heavier traffic along Route 66 as a result of the BIG project. I have been witness to fatal accidents on Route 66 when traffic is backed up due to construction or freeway closures. I respectfully request that project construction include turning lanes on major roads to allow traffic to flow and help prevent accidents. I1674-4

Additionally, as a resident of Silver Lakes I request the consideration of constructing an overpass for vehicles on Vista Road at the railroad crossing, which is our primary (most efficient) way to enter and exit our community. We currently have significant delays with slow or even stopped trains at the Vista Road crossing. While this is inconvenient, it can be life threatening if it prevents first responders from entering or exiting our community efficiently in an emergency when every second counts. I1674-5

I request that the open review period be extended as long as possible so more members of our community can review the 18,000 pages of text of the Draft Environmental Impact Report and submit their concerns. I1674-6

I appreciate your consideration of the opinions and concerns of our valuable community.

Respectfully,

L DeRome

RESPONSE TO COMMENT LETTER I1674, LORI DEROME

I1674-1 See **Consolidated Response 04** concerning general non-CEQA issues.

I1674-2 BIG's operational impacts concerning air quality are addressed in **Draft EIR Section 5.3: Air Quality**. The study area for direct and indirect impacts concerning air quality is the BIG footprint and the South Coast Air Basin (SCAB) and the Mojave Desert Air Basin (MDAB), which includes the Silver Lakes/Helendale Community.

For **Draft EIR Impact 5.3-2** (Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable State or federal ambient air quality standard?), the analysis found that BIG would produce substantial CO, VOC (ROG), NO_X, and PM regional emissions (see pages 5.3-70 to 5.3-120). However, these would make relatively small contributions to regional levels. There is currently no agency-accepted methodology available that can accurately quantify regional health effects from CO, VOC, NO_2, O_3, or PM exposure associated with an individual project's emissions. Therefore, the analysis is limited to BIG's potential contribution to regional pollutant levels and generally describes the types of adverse health effects associated with exposure to those pollutants. See **Consolidated Response 02** concerning significant and unavoidable impacts and the Statement of Overriding Considerations.

For **Draft EIR Impact 5.3-3** (Would the Project expose sensitive receptors to substantial pollutant concentrations?), the analysis found, that despite incorporation of mitigation measures **MM BIG AQ-1** through **MM BIG AQ-14** (which require the implementation of fugitive dust control, equipment emissions standards, use of renewable diesel and low-VOC materials, truck idling and routing controls, and design features that support future electrification)**,** there would be a significant and unavoidable impact for construction concentrations at the BIG footprint and construction and operation cancer risk at the BIG footprint (pages 5.3-124 to 5.3-161). There would be a less-than-significant impact for all localized corridor impacts. The corridor impact study area included the rail corridor west of the BIG Footprint to the Silver Lakes Community. Thus, impacts to the Silver Lakes Community would be less than significant.

As noted on Draft EIR page 5.13-113, BIG would use zero-emission electric hostlers for container movements between the intermodal facility and the transload warehouses. These BIG design features have been assumed in BIG's operational impacts analysis. However, a small percentage of diesel trucks are assumed to transport containers directly to the intermodal facility, as the use of zero /near-zero emission trucks has been determined to be infeasible. See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community; **Consolidated Response 02** concerning significant and unavoidable impacts and the Statement of Overriding Considerations, **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 06-02** concerning the role of social and economic issues under CEQA, **Consolidated Response 10**

concerning BIG's potential effects on the Silver Lakes/Helendale Community, and **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community. See **Response O21-49**, **MM BIG AQ-11** (which requires truck efficiency measures, specifically CARB's Carl Moyer Efficiency Program), and **MM BIG AQ-14** (which requires various measures to reduce BIG transload warehouse-related operational emissions) concerning trucks, **Response O21-76** concerning trains, and **Response S6-7, S6-13,** and **S6-14** concerning infeasibility of zero emission locomotives.

I1674-3 BIG's rail yard operational noise impacts are addressed in **Draft EIR Section 5.12: Noise and Vibration**. The study area for impacts concerning noise and vibration includes the BIG footprint and nearby sensitive receptors. For **Draft EIR Impact 5.12-1** (Would the Project generate a substantial temporary or permanent increase in ambient noise levels (i.e., compared to levels without the Project) in vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?), the analysis found that BIG would result in a significant and unavoidable impact despite incorporation of **MM BIG NOI-1** (which requires preparation of a Construction Noise Logistics Plan) and **MM BIG NOI-2** (which requires construction of Noise Barriers) (pages 5.12-76 to 5.12-131). See **Consolidated Response 02** concerning significant and unavoidable impacts and the Statement of Overriding Considerations. A noise barrier (i.e., sound wall) analysis was conducted (Draft EIR page 5.12-84) to determine noise barriers to be financially feasible as mitigation to reduce BIG operational noise impacts.

Concerning the Silver Lakes/Helendale Community, which is 9.4 miles southeast of the BIG Specific Plan area, a sensitive receptor for Silver Lakes/Helendale was identified in **Draft EIR Section 5.12** page 5.12-54 through 5.12-55. W1, which is located north of Indian Trail and is 715 feet north of BIG, was included as part of the analysis for potential noise and vibration impacts to sensitive receptors.

I1674-4 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings and Senate Bill 743's required shift from delay to vehicle miles traveled, and **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossing. Notwithstanding, although outside CEQA's scope, the **Barstow International Gateway Level of Service Assessment – Transportation Analysis** (**Draft EIR Appendix 5.15 BIG-2**) that was conducted identified the transportation modifications (TMs) (i.e., transportation improvements) needed to address forecast operational deficiencies of intersections, roadway segments, and freeway off-ramps; see **Draft EIR Appendix 5.15-2 Table 2: Transportation Deficiencies and Proposed Transportation Modifications Summary** (**Draft EIR Appendix 5.15-2** page 20). See page 5.15-57 for details regarding the Traffic Control Plan that would be prepared to minimize impacts from construction traffic.

I1674-5 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale

Community, **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, and **Consolidated Response 06-01** concerning the geographic scope of the environmental analysis and definition of study area. See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings. **Consolidated Response 06-03** concerning community safety, **Consolidated Response 06-04** concerning quality of life, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings. Finally, it is noted that BIG does not propose closing Vista Road or any other transportation improvement in the Silver Lakes/Helendale Community.

I1674-6 See **Consolidated Response 01** concerning community outreach and the Draft EIR public review period.

COMMENT LETTER I1675

I1675

January 2, 2026 Introduction, My Why - dEIR Response

To the City of Barstow, Planners, BNSF:

I, Sherry Baily, have been engaged in staying informed and proactive throughout as many processes of this development as possible while maintaining my family, personal, and business life. My story - my concerns have not changed since my initial public comment during the BNSF Barstow International Gateway Scoping Letter of 2024, attached below for the public record.

Since 2022, I have participated in every Barstow Town Hall meeting concerning BIG (presentations that never allowed public discussion as a whole with agencies - keeping conversations segregated, isolated, and not as a holistic community-centered approach meeting in which numerous people have asked for), attended multiple Chamber of Commerce gatherings, engaged in numerous Barstow Economic Development sessions, convened at Barstow Community College, personally organized meetings for the Sylvan Avenue Community and the Country Club Community, attended a meeting at Silverlakes Association as a guest, and participated in Barstow City Hall meetings to listen and deliver public comments. Additionally, I have been present at County of San Bernardino Planning meetings to listen and provide input, alongside an endless series of phone calls, email exchanges, and Zoom conferences. Throughout this process, I have remained respectful and patient. I attentively listen to the presenters to absorb knowledge. I hear the audience's applause, yet I feel compelled to break my silence. I request the opportunity to speak—to illuminate that while this initiative may seem beneficial, it is imperative to acknowledge the potential ramifications. There are communities, particularly the Sylvan Avenue Community, whose lifestyles, health, safety, and homes may be affected in ways we cannot yet comprehend, as nothing of this magnitude has ever been developed. I1675-1

Why am I so deeply invested? Because I became aware of the Barstow International Gateway Project announcement through social media during Barstow's 75th Anniversary celebration. How could such a significant development transpire in my own backyard without my knowledge? There was no formal correspondence, no notification—merely a flurry of social media buzz. As I delve deeper into the matter, I find the absence of notification regarding the parcels directly affected to be quite inappropriate. I1675-2

I chose to embrace individuality. Over the years, I have walked the Sylvan Avenue Community, as well as the Country Club Community, engaging in dialogue with my neighbors on numerous occasions. My objective is to collect their stories and concerns, to foster connections, and to promote awareness and civic involvement. Where have BNSF Railway, the City of Barstow, or the County of San Bernardino actively engaged with the communities to cultivate meaningful relationships? Allow me to clarify—soley directing individuals to social media platforms or the City's website does not constitute genuine outreach. Our town lacks a newspaper or a tangible medium for communication. It is astonishing that it took BNSF Railway two years (from October 2022 to November 2024) to meet with the Sylvan Avenue Community—one of the communities that will be directly, significantly, and unavoidably affected during the Beginning Year of 2026, the Interim Year of 2033, and the Horizon Year of 2048. Yet, BNSF will proudly proclaim its commitment to I1675-3

community outreach, as referenced by the City of Barstow website below. I have attached a list of community questions to share that was created with 81 Sylvan Ave Community and Country Club Community members with the BNSF Team.

I1675-3 cont.

As Warren Buffett shares in his "5 Hour Rule," I have invested consistently, with depth in learning and agencies and environment. I have invested my time regarding noise and vibrations, water quality and availability, geology, certified dark sky communities, regulatory agencies, and environmental justice. I have also observed how BNSF seemingly shifts responsibility for its actions by soliciting "waivers," "overriding considerations," and "infeasibility." Recently, I became aware of BNSF's request for the County to secure $40 million in grant funding, with the intention of contributing $10 million to construct a vehicular overpass for the Silverlakes Community. This initiative would subsequently diminish the liability and insurance costs that BNSF would incur should they opt to contribute a greater amount. Once again, this exemplifies the shifting of burdens.

During this period, the more I acquire knowledge, the more I personally work for improvement. One aspect for which I am profoundly grateful, resulting from this endeavor, is the extent of my personal development and a newfound appreciation for the ability to do hard things. In all honesty, this journey has instilled in me a sense of discouragement regarding the state of the world, yet introspection draws me closer to the significance of a simple, interconnected, and spiritually enriched way of living.

I1675-4

I build my life with passion, purpose and intention. My home and lifestyle environments are created by design to foster overall well-being. As an individual who embraces accountability for my own health and possesses a career deeply entrenched in understanding the detrimental effects of environmental influences on both psychological and physiological well-being, I am dedicated to cultivating a safe space that facilitates the healing of the nervous system.

We have tried to be good neighbors to the BNSF team. This is not just a paycheck for us; it is our way of life. We remained publicly quiet as requested, until the Environmental Impact Report (EIR) was released. We have felt intimidation (fearing retribution), been silenced (with assertions that we lack understanding), isolated (from the Country Club Community and subjected to attempts to segregate our own Sylvan Avenue Community), deceived, manipulated, invited to exclusive closed-door meetings that lacked inclusivity, and told "no" (we cannot construct barriers on our property to shield ourselves from the project) only to later be told "yes" due to the "health and safety" implications imposed upon us by industrial development. Once again, the burden of this regional benefit has been shifted onto us, the homeowners.

I1675-5

In all honesty, until January 2025, according to a point of contact from Supervisor Cook's office, the Sylvan Avenue Community was not fully acknowledged. A telephone conversation revealed that the current delineation of the map accounted solely for residences situated on paved roads, neglecting properties along dirt roads. This raises the question of how such an oversight is possible, given that we pay property taxes and possess a five-digit street address. During this period, there were questions regarding our representation - whether we in fact fell under Supervisor Cook's or Supervisor Rowe's jurisdiction. Moreover, as an outlier community within the County, we believed ourselves to have little voice in the City of Barstow.

I1675-6

All we initially requested was a sound and vibration barrier to effectively separate us from the rail yard, along with designated turning lanes to facilitate safe ingress and egress from our community on Route 66, which is projected to experience a substantial surge in traffic. Additionally, we seek assurances of safe and potable drinking water, as well as protections for the value of our homes. However, upon reviewing the draft environmental impact report and observing the inadequate representation of the Sylvan Avenue Community, I am compelled to advocate for enhanced health protections and the possibility of relocation. This report, in its current form, is not transparent, lacks coherence, contains significant omissions of critical analysis, undermines feasibility without substantiating data, and fails to provide mitigations for those of us who are directly—significantly and inexorably—impacted. I1675-7

Mayor, I respect you and the position you occupy in high regard. I would not wish for any of this to rest upon my conscience. I have diligently honored the process, asked challenging inquiries, and engaged in discussions to grasp subjects with which I was previously unfamiliar. I have embraced vulnerability—raw and authentic—demonstrating unwavering dedication and tenacity, even in the face of discouragement from certain representatives. I prayerfully hope that you and the members of the City Council, as the agency in charge, will acknowledge my efforts and the concerns of the community to ensure that this process is followed with the utmost transparency and accountablity. I1675-8

This is not the end, but only the beginning. I look forward to your written response to my concens.

Life on the other side of tracks,

Sherry Baily
Sylvan Ave Community

*Attachment 1 (Sherry Baily's Public Comment Letter during the Scoping Process)

03/18/2024 Page 1
In response to "Community Meeting" at the Cora Harper Center on 03/13/2024

I am writing this as a property owner on XXXXX Sylvan Avenue, in Barstow CA. This BIG project, in my opinion, is a BIG disappointment regarding communication and the effect on us rural homeowners. I1675-9

1) The organization of the above-mentioned station-like meeting was dysfunctional as a participant looking for communication. There was NOT ONE person delivering information as a point of contact. The city deflected and redirected our questions to BNSF and BNSF referred to the project as only a concept – "conceptual". It was a lot of run around on our part as a resident, and no real answers provided…except to see that BNSF has now proposed to cross over ROUTE 66 and develop up to Sylvan's community access road. I1675-10

2) The way information about public meetings is poorly distributed. I1675-11

a) Not everyone listens to the radio, watches television, or scrolls through social media. Nor does Barstow produce a tangible newspaper to distribute information to my knowledge. No electronic mail or snail mail has been distributed to property owners to attend. I1675-12

b) This Community would like to be consulted and involved in the decision making process. I1675-13

3) Living on Sylvan, being considered County residents, where has the County been to meet with this community which will be highly affected by the planning of Barstow City and BNSF? The lack of communication and representation at these meetings has been a BIG disappointment. I1675-14

4) The BNSF Project Manager and I spoke after the Summer 2023 Meeting at the Performing Arts Center. I was grateful for their time and to connect on a human interpersonal level with a heartbeat behind this BIG project. They commented that they would "sit with me on my back porch, watching the sunset – noticing my current views, eating tacos and grieve over the change that will be affecting our community and my personal lifestyle". It was also asked by them to gather my community and look for dates where we can all meet and discuss as a group. It was requested that I connect with them over email. Thank you – for NOT responding to my emails. I get it, but another BIG disappointment and added stress to me. I1675-15

a) The stress of failure, the inability to follow through with the neighbors as I asked them to come join along in discussion, believing in the interaction I had with the PM. I1675-16

Page 2

b) Thank you, Representatives of all agencies for meeting with the surrounding communities (Newberry to Helendale, and all the people in-between) … yet failure to meet with the community of Sylvan Ave and neighboring streets … those residents who will be severely directly impacted. I1675-17

I feel the frustration would be lessened if communication was more effective.

It is my intent to please consider the following,

Environmentally

1) Vibration – Audible and non-audible transferred

a) My home is 2640 square feet. As an open floor plan modular home, I feel everything. I am concerned about the constant vibration and sound effect this will have regarding the frequency of needing to have my home inspected and leveled. I1675-18

b) Life is vibration.

c) We already feel the trains movement – idle or in travel, and maintenance. Current status of the rail gives a hometown feel.

i) Large scale operation - I would like to know how much vibration will occur, affecting us? There are PUBMED articles citing increases of cardiovascular disease, heart attacks, increase in blood pressure, decreased

mental health and sleep disturbances showing documentation of rail vibrational effects.
ii) "Monster Train" and "Mega Monster Train" configurations will also affect the length of exposure of the disturbance.

I1675-18 cont.

2) 24 Hour Noise Feedback
a) Going from ZERO (current), to a 24-hour operation will be continuous neighborhood stimulation.
i) We live out here to avoid it.
ii) Our community is delightfully quiet. The increased traffic that will occur by rail and by means of motor vehicle on Main Street will affect the serenity and solitude we have known as our way of life.

I1675-19

3) Excessive Light Stimulation/Pollution
a) Going from ZERO (current), we don't even have streetlights in this community, will increase 100%.
b) The serene view of the life around me will be highly impeded upon.
i) If you have ever lived in an area where the sky was unable to be

Page 3

I1675-20

viewed, sun or stars/moon … you would understand. To freely watch the seasonal meteor showers and night activity will no longer be accessible.
ii. To enjoy the horizon – while waking or retiring for the day.
iii. The view of the Mojave River will no longer be visible out my back door or from my bedroom window.
iv. The mountains surrounding us will be obstructed from my living room, dining room, kitchen and bedroom windows.

4) Air Quality
a. Having an auto-immune condition that affects my lungs, air quality is important to me.
b. Thank you, State of CA, for requiring the movement to zero emissions. I do not want to live in low air quality.
i. This is not only a concern of CA, but other states are also moving closer to zero-emissions.
ii. I feel that electric rail also creates concern for the length of the load and potential can derail the use of Mega/Monster Trains.
c. There are reports of the Rail industry to be known to use subpar/the worst locomotive engines for short travel movement within the rail yards versus utilizing them to haul loads. This BIG yard is too close to our homes and community.

I1675-21

5) Sound Stimulation
a. Currently our community is quiet enough to hear nature, all will be disturbed by this development.
b. Sleep is important and vital to good health. Due to my health and autoimmune dis-eases, I chose to rest 10 hours on average a day. I take good care of myself, in prevention and in listening to my body's needs.
c. This 24-hour facility and now surrounding industrial development is going to be choking my neighborhood out of all the qualities that we know as home.

I1675-22

6) Water

I1675-23

a. I have a private well, as do other neighbors. What happens if/when the water table drops significantly with all the development occurring in this area? b. How much water will be required to operate the BIG project? c. How much water will be required to operate the proposed solar plant facility? I1675-23 cont.

7) Soil Management
a. Any type of environmental spill.
b. Day to day operation of heavy metals into the ground, water and air. I1675-24

8) Wildlife

Page 4

a. With any development of land out here, it often exposes more Mojave Greens and Rattlesnakes to the surface and into our residential space. We will encounter quite a bit more encounters with land movement all around us. How can this be prevented?
b. More development may potentially impact the avian life that keeps balance of the snake population.
c. This will push out nature. I1675-25

Safety
a. Increased risk of security issues will be surrounding the rail yard.
i) If the intention of this project is to decrease theft on the rail, what will happen on the outskirts of the rail yard, leaving us as a community with an increased risk of theft traffic?
ii) We currently are aware of who our neighbors are and those who seem out of sorts and not having good intentions. We can typically deter any type of issue with community watch. I1675-26

Traffic Concerns – Safety and Congestion
a. Making a left hand turn onto Sylvan Ave from Main Street is often a risk with people at increased speeds, inattention/distractions, or unsafely passing on the left in a double yellow or throwing up debris from passing on the shoulder…this hazard will significantly increase.
b. Congestion for our community to get in and out of, with the influx of the number of potential jobs available, 24 hours needs to be considered.
c. Biking lanes-Commuter lanes
i. We used to be able to bike to town. High speed life with non attentive drivers and increased traffic will make this near obsolete. I1675-27

Community
a. Generations of families live here and 30+ year community relationships are the heart of this neighborhood. Kinda phenomenal when you think about B arstow only being a city for 75 years.
b. Freedom to enjoy the county life and space around us will be gone.
c. The joy of living near Route 66, and the worldwide travelers that pass on through annually…I hope that accommodations are made for foot and bike travelers. I1675-28

Page 5

Obstruction of Views

a. As mentioned above in Excessive Light Stimulation/Pollution, the view of Mojave River may be obstructed highly, as well as mountain ranges and night sky. In my opinion, the best of the best reasons to love our desert life. I1675-29

Wind Involvement

a. Concern for the impact of the desert sand drifts that occur when the solar facilities are installed. This is a HIGH WIND passageway with minimal windbreak. How will this be monitored and potentially affect our neighborhood? I1675-30

Decrease in Property Value

a. Being surrounded by industry in the neighborhood of only a few blocks, this is not likely going to be of any financial good to our property value, something we work hard for.

b. We have livestock and don't want to see us no longer being able to raise food and enjoy the country life we currently have.

c. Will there be a concern of our property taxes changing to commercial zone because of the potential industrial growth around us? I1675-31

It is my utmost concern about this project and how it will affect my overall health and wellbeing. My home is spacious, indoors and outdoors. My home is 2640 square feet with amazing views through intentionally placed picture windows.

Not only do I just simply have a home on Sylvan Avenue, I live on this desert land because it is my way of life. I don't live a commercialized life for my own health and medical reasons. I try to live very much according to the Seasons, acknowledging sunrise and sunset, grounded in nature, breath and movement. It is not something I do; it is something I live.

How many people get to camp – sleep outdoors, freely – in their own backyard, next to the firepit or next to their horse grazing on their evening meal…sensing the desert with 5 senses? I currently experience the community by mountain biking, hiking, my Tai Chi and Qigong practice, meditation and creating safe space for the work I do as a Neuromuscular Massage Therapist business owner in our town. I professionally provide safe space for others while working with physical and emotional pain. I rely on the habits and routines I have in practice to provide the best care of me, to show up every day to provide quality care for others. I won't wait for retirement to enjoy the gift of life I have been given; I live for today. I1675-32

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Having a connection to this land, I spend time with our desert wildlife and the beauty around me. We have residential ravens/crows that have been in these trees for generations and watching the ground walker fledglings learn to spread their wings - they are brilliant in communication and recognition, the sharp sparrow hawks, seasonal turkey buzzards, the stunning silver foxes, coyotes, desert tortoises, migrational patterns of the tarantulas, owls, hummingbirds, doves, families of quail up to 30 roaming freely, rabbits, lizards and snakes of all kinds thrive in these lands. The fragrance of the wild sage and the super cool little white fuzzy wasp ants that live

around the base of the creosote bushes…all of this will be gone. Probably not something that all get a chance in life to appreciate.

My home has a multitude of large windows, so even when indoors … I can bring the outdoors in. Having views of the black mountains behind me to the seasonal snow-capped mountains out my dining room windows. The reflective view of the Mojave River when she is flowing or just the simple knowing that there is a force of nature under that bed of sand. ALL OF THIS, will be obstructed from the development of the BNSF BIG Plan.

Lastly, my connection to land is of importance to me because my deceased parents' ashes are here on the land. As a military dependent, this is where we have chosen our roots to be since 1993. Taking care of my parents in the last years of their lives was a calling to care for my elders (age 60 and 64 at passing). That isn't a calling that is answered by many…and now, I just can't pick them up and take them with me. I1675-32 cont.

People used to cherish land and home ownership as sacred. They would transport homes by horse and carriage to relocate their homes with them, sometimes even by large communities of humans working together. Sadly, our world is disposable and commercialized, disconnected and rarely diving deep into life…and just looking for the "next BIG thing." I will never discourage growth or dreaming BIG, but just remembering – what I do, will potentially have an effect on someone else.

Just for today…I will not be angry. I will be grateful. I will do my work honestly and treat every living thing with kindness. -Reiki Precepts

So, whether I write and this be of any value to the project or I simply write this for my own acknowledgement of my life's journey…

May Peace and Blessings shower us all,
Sherry Baily XXXXX Sylvan Ave, Barstow, CA 92311

*Attachment 2
Questions from Sylvan Avenue Community to BNSF, Barstow, County and Agencies

Sylvan Area Community Meeting Comments/Questions November 19, 2024

ZONING
Will any of the BIG project be located south of Route 66? If so, what will be there? What will the zoning be between the Sylvan neighborhood and the BIG project? Don't want to be annexed into the City, want to stay in the County. Can city residents living near Country Club Drive be rezoned back into the County? Will zoning change so residents can no longer have livestock? What does the red area on the zoning map indicate? What uses are allowed in the pink areas labeled Business Park? Want a more detailed (street level) map focused on just Sylvan neighborhood showing (and explaining) current County zoning. Want a clear explanation of what is allowed in each zoning area. Will a gas station be allowed at the end of Sylvan? Does the City own the property south of Gazana that was going to be used for the aluminum plant? How is it zoned? Will the City reclassify the 100 year flood zone east of Country Club I1675-33

Drive as discussed as part of the aluminum plant project? Will the Sylvan neighborhood be rezoned commercial?	I1675-33 cont.
STREETS & TRAFFIC What roads will access the Sylvan Community? Will roads be widened and homes need to be torn down? Will there be an increase in truck traffic? Will there be truck traffic 24 hours a day? What roads will be used to access the BIG facility? Will these roads be near us? How much more traffic will there be on Route 66? Will there be additional traffic in the Sylvan neighborhood? Will turn lanes be added on Route 66 to enter Sylvan neighborhood? Will there be bike lanes? Will school bus routes change? Will the project cause an increase in traffic congestion and/or a delay in emergency response? Will all the land west of Prairie be a parking lot?	I1675-34
WATER Where does our water come from? The Mojave River? The Mountains? Will the project affect the flow of Mojave River? Where will water come from for project construction and operation? Where will BNSF buy water rights? Will BIG decrease the water table and how will effects be monitored? Will project affect local wells (quality or quantity)? Will everyone be required to give up their private wells and have community wells or city (Golden State) water service?	I1675-35
TIMELINE Have they already started construction at Main St and Hinkley Road? What is going there? When will the project break ground? When will the facility open?	I1675-36
SOLAR PROJECT What will the solar project look like? Where exactly will the solar plant be located? (Will it be near Spinet?) Who will own/operate the solar field? Don't like solar field. It will be an eye-sore. Can the solar project be screened or can residents get a waiver to increase their fence height to block the view?	I1675-37
PUBLIC SAFETY Will project affect fire dept response time? Who will provide fire protection for Sylvan residents? Who will provide fire protection services for BIG facility? Does BNSF have its own fire department? Who will provide law enforcement? County, City, BNSF? Sylvan area is currently experiencing an increase in crime. How will hazardous material spills be handled and by whom? What will keep hazardous spills from affecting out water quality?	I1675-38
ENVIRONMENTAL How will the project affect air quality? How strong will the vibrations be? Will vibrations damage a modular home's foundation? Can project be "sunken" to preserve view as well as reduce, light, vibration? Will the lights of the facility (and along tracks) be bright? Screened? Fear of dust and sand storms caused by grading. How will this be mitigated? Can we see a 3D (360 degree) rendering of project showing location of tracks, buildings etc.? Will BNSF put a sound wall along Route 66?	I1675-39
PROPERTY VALUES How will the project affect property values? Increase or decrease? Will property taxes go up? If property values decrease will BNSF pay a supplement to owners up to	I1675-40

current market value? Is the buyout of homes (around Gazana and Amaryllis) a possibility? Is buyout of home near County Club Drive a possibility? Is buyout of homes anywhere in Sylvan area a possibility? Whose power of eminent domain was used to get land for this project? How does this project benefit Sylvan residents? Would BNSF pay to add amenities to Sylvan neighborhood?

I1675-40 cont.

GENERAL COMMENTS, QUESTIONS & EMOTIONS
We are frustrated. We feel like we have no choice with this project. This project will change the way of life for all Sylvan residents. Residents love the current peace and quiet and listening to trains (at current amount). Why is BIG project being located here?

I1675-41

Additional comments/questions from Sylvan mtg on 9/22:

Concerned about traffic accidents at Main & Sylvan and that potential increase in traffic will cause increased accidents. Want left-hand and right-hand turn lanes. What will the alternate traffic route (for Sweeten/Sylvan residents) be during storm events? Biggest concern is access to clean drinking water. Concerned about security. Loss of stars/night sky. Residents believe Sylvan property values will decrease. Don't want Sylvan to be paved as a route to BIG. Not sure that sound wall will do that much good. Health concerns – Respiratory, cardio & insomnia

I1675-42

Additional Sylvan Questions for 10/7/25
How many traffic lanes will there be over the Lenwood channel, 2 or 4? Where exactly is the west boundary of the solar field? Is it Castle street? Concerned about traffic congestion at Main Street and Country Club Drive. How will traffic along Main Street be rerouted during construction? How will this affect school buses? Can BUSD have a liaison during construction to discuss how to get school buses quickly and safely through construction zones? Also concerned that once BIG is built the Main and Country Club intersection will back up when employees are going to and from work delaying school buses. Asked about the process/timeline for the EIR release until public hearings. Acknowledge the 45-day comment period. Then how long until they get responses to their written comments/questions? How will they be notified of the answers? How long will they have to review the answers? Then how long until the public hearings? Will they be able to speak at the public hearing even if they don't live in the City? How long after EIR approval will they break ground? What will be used to prevent the soil under the solar panels from creating dust in wind events? They want someone (a professional) to explain the EIR noise and air quality numbers to them.

I1675-43

*Attachment 3 (taken from the City of Barstow's Website - About the General Plan Update)

Get Involved & Stay Informed!

Throughout the General Plan update there will be various opportunities for the community to participate in the process. The following links provide information on, and materials associated with past and upcoming community engagement opportunities.

I1675-44

Contact Us

If you have specific questions you would like to discuss, feel free to email generalplan@barstowca.org or call 760-255-5152.

Public Meetings, Engagement Activities, and Materials

The following public meeting and engagement activities presented information, status updates, and enabled communication between the City and general public regarding both the General Plan Update and BIG Specific Plan.

2025

Draft Documents Released for Public Review - Click here to view the Draft General Plan, BIG Specific Plan, Zoning Amendments and associated Environmental Impact Report.

Barstow Town Hall - September 4, 2025 | Barstow Community College Performing Arts Center | [Flyer] [Presentation] [Current General Plan Land Use Map - large scale] [Draft Proposed General Plan Land Use Map - large scale] [Draft Land Use Categories Table] [Draft Proposed General Plan Figures by Element]

Barstow Town Hall - March 20, 2025 | First Baptist Church | 250+ attendees [Flyer] [Presentation] [Event Recording]

2024

I1675-44 cont.

Sylvan Community Meeting - November 19, 2024 | Hinkley Community Center | ~80 attendees

Barstow Community Update - October 3, 2024 | Barstow Community College Performing Arts Center | 300+ attendees [Flyer] [Presentation]

Greater High Desert Chamber of Commerce - July 10, 2024 | High Desert Chamber of Commerce | ~125 attendees

Open House & Scoping Meeting - March 13, 2024 | Cora Harper Fitness Center | 200+ attendees [Flyer] [Notice of Preparation and Public Scoping Meeting] [Presentation] [Housing Survey Results] [Vision Word Cloud] [March 2024 Environmental Justice Story Map] [Environmental Justice & Air Quality Issues] [Environmental Justice & Water Issues] [Photos]

City Council Briefing. February 20, 2024 [Presentation]

2023

Helendale CSD Town Hall - July 18, 2023 | Silver Lakes Clubhouse | 100+ attendees

Barstow Community Survey - April to September 2023 | online survey regarding the City's vision and priorities to improve housing, environmental justice, and community engagement | 213 survey responses [Housing Survey Results] [Vision Word Cloud] [March 2024 Environmental Justice Story Map]

RESPONSE TO COMMENT LETTER I1675, SHERRY BAILY 1 OF 13

I1675-1 See **Consolidated Response 04** concerning general non-CEQA issues.

I1675-2 See **Consolidated Response 01-01** concerning community outreach.

I1675-3 See **Consolidated Response 01-01** concerning community outreach.

I1675-4 This comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of this Final EIR for their consideration in reviewing the Project and EIR. To the extent the comment raises questions about the requirement for a statement of overriding considerations under CEQA, see **Consolidated Response 02** concerning significant and unavoidable impacts and the Statement of Overriding Considerations. Regarding concerns about feasible and enforceable mitigation, see **Consolidated Response 05** concerning feasible and enforceable mitigation. The commenter expresses an opinion about funding for an overpass to the Silver Lakes Community, which is not part of the proposed Project or required as a mitigation measure for BIG. The opinion does not specifically raise an issue regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue, which would require a response under CEQA. The commenter's opinions are noted for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the Project and EIR.

I1675-5 See **Consolidated Response 01-01** concerning community outreach for a summary of the public engagement events that were held as part of the scoping process for the Draft EIR. The comment refers to "intimidation," "Isolation," "silencing" and "manipulation" at these meetings but provides no evidence of these occurring. To the extent that the comment generally references health and safety impacts and the "burden" of BIG's regional benefits, BIGG's full impacts have been analyzed and disclosed in the EIR. Specifically, BIG's health and safety impacts have been analyzed in various EIR sections, such as **Section 5.3: Air Quality**; **Section 5.7 Geology and Soils**; **Section 5.8 Greenhouse Gases**; **Section 5.9 Hazards and Hazardous Materials, and Wildfire**; S**ection 5.10 Hydrology**; **Section 5.12 Noise and Vibration**; **5.15 Transportation**; and **Section 6.0: Cumulative Impacts**. This comment primarily concerns the commenter's opinion regarding BIG and does not address the adequacy or accuracy of the Draft EIR. See **Consolidated Response 04** concerning general non-CEQA issues.

I1675-6 See **Consolidated Response 06-01** concerning the geographic scope of the environmental analysis and definition of study area, and **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor, which includes the Sylvan Avenue community. See **Response I1675-2** concerning community engagement for BIG.

I1675-7 See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses. Overall, BIG's transportation impacts are considered less than significant, with no mitigation required. Thus, there is no expected projection for a substantial surge in traffic along Main Street near the Sylvan Community, which would potentially warrant the construction of designated turning lanes. See also **Consolidated Response 09-04** concerning consideration of the Sylvan Community in the Hydrology and Water Quality analyses, **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses, **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis, **Consolidated Response 06-02** concerning the role of social and economic issues under CEQA, and **Consolidated Response 06-05** concerning decreased property values.

I1675-8 See **Consolidated Response 04** concerning general non-CEQA issues.

I1675-9 through **I1675-45** These comments, which were provided as part of public comment for meetings conducted during the scoping process, are included as an attachment to this comment letter. The scoping period provided an opportunity for the City to hear from agencies, organizations and individuals about issues of interest to them for consideration in the Draft EIR. As noted in **Draft EIR Section 2.3**, all comments received during the public comment period initiated with issuance of a Notice of Preparation (NOP) February 15, 2024, to March 26, 2024 (i.e., the "scoping period") were taken into consideration during preparation of the Draft EIR. In accordance with State CEQA Guidelines § 15123(b)(2), an EIR summary must identify areas of controversy known to the Lead Agency, including issues raised by agencies and the public**. Draft EIR Table 2-1: NOP Comment Letters and Scoping Meeting Summary** (page 2-2), includes comments from the public and public agencies regarding BIG. Concerns raised regarding BIG include an increase in noise, traffic, air quality, vibration, and biological and cultural resources. These issues have been addressed throughout the Draft EIR. In most instances, BIG's impacts can be reduced to less than significant; there are several impacts that would remain significant and unavoidable even with the application of feasible mitigation measures. As such, it has already been addressed, and no further response is necessary. Additionally, specific responses to comments I1675-9 to I1675-44 are provided below.

I1675-9 through I1675-17, I1675-33, I1675-36, I1675-41, I1675-44

See **Consolidated Response 01-01** concerning community outreach; **Consolidated Response 01-02** concerning the Draft EIR public review period; **Consolidated Response 03** concerning recirculation of the Draft EIR; **Consolidated Response 06** concerning potential effects on communities; and **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community.

1675-18, I1675-19, I1675-20, I1675-21, I1675-22, I1675-29, I1675-30, I1675-39, I1675-42

See **Consolidated Response 06** concerning potential effects on communities; **Consolidated Response 06-04** concerning quality of life; **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community; **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses; **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis; and **Consolidated Response 09-05** concerning consideration of the Sylvan Community in the lighting analysis.

I1675-23, I1675-24, I1675-35, I1675-38

See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans; **Consolidated Response 06** concerning potential effects on communities; **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community; **Consolidated Response 09-04** concerning consideration of the Sylvan Community in the Hydrology and Water Quality analyses; **Consolidated Response 09-07** concerning consideration of impacts to Sylvan Community private water wells; **Consolidated Response 09-10** concerning consideration of the Sylvan Community in the Hazardous Materials analysis, including arsenic levels/mobilization, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 08-02** concerning the increased rail activity's effects regarding traffic delays and potential crash hazards at at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I1675-25 See **Consolidated Response 06** concerning potential effects on communities; **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community; and **Consolidated Response 09-08** concerning consideration of Sylvan Community biological resources.

I1675-26 and I1675-38 See **Consolidated Response 06** concerning potential effects on communities; **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 08-02** concerning the increased rail activity's effects regarding traffic delays and potential crash hazards at at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at

at-grade crossings, **Consolidated Response 09-07** concerning consideration of impacts to Sylvan Community private water wells, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I1675-27 As noted in **Draft EIR Appendix 5.15 BIG-2**, BIG proposes to implement several improvements along Main Street between BIG's western site limit and Country Club Drive, including near Sylvan Avenue, as follows: "**TM-11**: As part of BIG's frontage improvements, repaint the north edge-line and centerline with 6" retroreflective lane markings and install rumble strips and pavement reflectors on the north edge-line and centerline. On Main Street between Castle Court and Country Club Drive, also repaint the south edge-line with 6" retroreflective lane markings and install rumble strips and pavement reflectors." (page 8). These improvements were recommended in the San Bernardino County Local Road Safety Plan to improve safety along the corridor.

Traffic operations (Level of Service (LOS) Assessment) were studied in **Draft EIR Appendix 5.15 BIG-2**. Consistent with the San Bernardino County Traffic Impact Study Guidelines, BIG studied intersections where BIG would add 50 or more peak hour project trips. The traffic operations study area is illustrated in **Draft EIR Appendix 5.15 BIG-2 Figure 12: BIG Transportation Resource Study Area** (page 45). During the peak hour, BIG proposes to add approximately 31 vehicles per hour in Opening Year 2028 (46 vehicles per hour in Horizon Year 2048) along this stretch of Main Street. Therefore, the intersection of Main Street and Sylvan Avenue was not included in the LOS Assessment (**Draft EIR Appendix 5.15 BIG-2**) because BIG would add less than 50 peak hour trips. As part of TM-8 (Horizon Year 2048 Plus BIG), prior to occupancy of the transload warehouse center exceeding 7,800 KSF, BIG would provide to the City 4.04% fair share of the costs for widening Main Street between vacated Hinkley Road and Country Club Drive to four lanes; see **Draft EIR Appendix 5.15 BIG-2 Table 2: Transportation Deficiencies and Proposed Transportation Modifications Summary** (page 20).

Consistent with the proposed General Plan Bike Classification Map, on Main Street from Country Club Drive to Lenwood Road, BIG proposes to install Class II bike lanes along both sides of the street and sidewalk along the north side of the street to help improve active transportation connections; see **Draft EIR Appendix 5.15 BIG-1** pages 98-99. **I1675-28.**

See **Consolidated Response 04** concerning general non-CEQA issues, **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community, and **Consolidated Response 06-04** concerning quality of life.

I1675-34 The responses to the questions posed in this comment have been grouped and organized with headers below to aid understanding and readability.

Sylvan Community

For purposes of this discussion, the Sylvan Community is comprised of the residences located south of Main Street and generally near/along Amarylis and Sylvan Avenues. As illustrated in **Draft EIR Figure 3-5: BIG Components Overview** (page 3-11), the BIG Specific Plan area does not include the Sylvan Community. BIG does not propose to modify roadways or add vehicle trips in the Sylvan community. See also **Draft EIR Section 3.0: Project Description (Draft EIR pages 3-71** through **3-74)** for proposed street vacations to accommodate BIG as depicted in **Draft EIR Figure 3-27: BIG Proposed Street Vacations** (Page 3-72) and as listed in **Draft EIR Table 3-14: Big Street Vacations and Dedications** (Pages 3-73 and 3-74.)

Access to BIG

BIG proposes three public access points, as illustrated in **Draft EIR Figure 3-17: Barstow International Gateway Conceptual Site Plan** (page 3-44). The rail yard, including the intermodal facility, would be accessed from a new signalized intersection on Main Street at Country Club Drive. The transload warehouse center may be accessed from Hinkley Road to the west or a new signalized intersection on Lenwood Road at Jasper Road/proposed Hinkley Road to the east. The access improvements are described in more detail in **Draft EIR Appendix 5.15 BIG-2** pages 4-6.

BIG's overall truck and employee traffic distribution are illustrated in Draft EIR Appendix 5.15 BIG-2 Figure 35: BIG Overall Heavy-Duty Truck Traffic Distribution (page 149) and Figure 36: BIG Overall Employee Traffic Distribution (page 150).

The rail yard and transload warehouse center are forecast to operate 24 hours a day, so there may be truck traffic along designated City truck routes 24 hours a day.

Traffic Operations

Traffic operations (Level of Service (LOS) Assessment) were studied in **Draft EIR Appendix 5.15 BIG-2**. As summarized in the LOS Assessment, the addition of BIG traffic would increase delays at some intersections and roadways. The addition of BIG traffic would not result in LOS deficiencies under the Opening Year (2028) scenario. The addition of BIG traffic would result in LOS deficiencies at several locations under Interim Year (2033) and Horizon Year (2048) scenarios, which would be offset by the recommended improvements (**Draft EIR Appendix 5.15 BIG-2** page 1-2). See **Draft EIR Appendix 5.15 BIG-2 Table 43: Transportation Deficiencies and Proposed Transportation Modifications** (page 242) for the proposed transportation modifications and associated LOS (pages 242-243). As noted in **Table 43: Transportation Deficiencies and Proposed Transportation Modifications** (page 245), with the proposed transportation modifications, delays/LOS would improve at some intersections and roadway segments compared to No BIG Baseline conditions.

Lenwood Road, between High Desert Road and Interstate 15 (I-15) southbound off-ramp, is projected to operate at a deficient LOS based on daily traffic volumes and roadway capacity. However, a detailed arterial analysis for this segment found that operations are acceptable in both directions during the peak hours. This is because roads near the BIG Specific Plan experience more steady traffic throughout the day rather than sharp increases during peak

hours, allowing them to handle higher daily vehicle volumes. As a result, roadway widening is not recommended for this segment.

Emergency Response Delay

See **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings and **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings.

Main Street between Country Club Drive and Hinkley Road

BIG is forecast to add 350 passenger vehicle trips per day to Main Street west of Country Club Drive under Opening Year 2028 Conditions (518 passenger vehicle trips per day under Horizon Year 2048 Conditions) (**Draft EIR Appendix 5.15 BIG-2** pages 179 and 201). BIG would not result in any truck trips along Main Street west of Country Club Drive (**Draft EIR Appendix 5.15 BIG-2** page 149). See also Response I1675-27 concerning peak hour trips and study area determination.

BIG does not propose turn lanes along Main Street at Sylvan Avenue or Amarylis Avenue. As noted in **Draft EIR Appendix 5.15 BIG-2** (pages 6 through 15), BIG proposes several improvements along Main Street between BIG's western site limit and Country Club Drive, including near Sylvan Avenue: "**TM-11**: As part of BIG's frontage improvements, repaint the north edge-line and centerline with 6" retroreflective lane markings and install rumble strips and pavement reflectors on the north edge-line and centerline. On Main Street between Castle Court and Country Club Drive, also repaint the south edge-line with 6" retroreflective lane markings and install rumble strips and pavement reflectors." (**Draft EIR Appendix 5.15 BIG-2** page 8). These improvements were recommended in the San Bernardino County Local Road Safety Plan to improve safety along the corridor.

As part of TM-8 (Horizon Year 2048 Plus BIG), prior to occupancy of the transload warehouse center exceeding 7,800 KSF, BIG would provide to the City 4.04% fair share of the costs for widening Main Street between Vacated Hinkley Road and Country Club Drive to four lanes; see **Draft EIR Appendix 5.15 BIG-2 Table 2**: **Transportation Deficiencies and Proposed Transportation Modifications Summary** (page 20). TM-8 would be designed and constructed by others (such as the City of Barstow) in the future, if it is determined to be warranted and funding is available.

Main Street between Country Club Drive and Lenwood Road

BIG is forecast to add 2,080 passenger vehicle trips and 399 heavy-duty truck trips per day to Main Street west of Country Club Drive under Opening Year 2028 Conditions (2,740 passenger vehicle trips and 630 heavy-duty truck trips per day under Horizon Year 2048 Conditions) (**Draft EIR Appendix 5.15 BIG-2** pages 132, 133, 179, and 201). BIG proposes widening Main Street from two lanes to four lanes for approximately 0.5-mile east of Country Club Drive, resulting in a consistent four-lane roadway width through Barstow. Additionally, the existing two-lane Main Street over Lenwood Channel low water crossing would be replaced with a new four-lane bridge that would accommodate the 100-year flood condition. Main Street would be raised over Lenwood channel, modifying the vertical alignment of Main Street for approximately 0.8 miles (**Draft EIR Appendix 5.15 BIG-2,** page 6).

Bicycle Lanes Along Main Street

As discussed in **Draft EIR Appendix 5.15 BIG-1 Table 24: City Proposed General Plan Circulation Map Conflict Evaluation** (**Draft EIR Appendix 5.15 BIG-1,** page 98) and **Table 25: City and County Bicycle Facilities Map Conflict Evaluation** (**Draft EIR Appendix 5.15 BIG-1,** page 99), BIG proposes to install Class II bike lanes along both sides of the street on Main Street from Country Club Drive to Lenwood Road. BIG also proposes to dedicate R/W to accommodate future bike lane construction by others on Main Street from the western Specific Plan area limit to Main Street Driveway/Country Club Drive.

Bus Routes

Draft EIR Impact 5.15-1 (pages 5.15-59 to 5.15-60) addresses impacts from BIG construction activities and construction traffic on adjoining and nearby roadways and land uses. BIG construction may involve temporary lane/roadway closures and increased construction traffic. Temporary modifications to school bus routes/stops during BIG's construction may be required. If any modifications were to occur, they would be determined during the construction phase. As discussed in Draft EIR pages 59-60, consistent with City standards and construction best practices, BIG's contractor would prepare a detailed Traffic Control Plan (TCP) pursuant to City of Barstow Standard Plan 138 requirements to minimize the impact of construction activities and construction traffic on adjoining and nearby roadways and land uses, including school bus activities. A TCP is required for any work in the public right-of-way and would show how to safely manage vehicles, bicyclists, and pedestrians through or around construction zones. The TCP would be prepared in close consultation with the affected land uses, the City, local law enforcement, and fire department officials. The City would review and approve the TCP before commencement of any construction activities. The County would review and approve the TCP portions relevant to work within County rights-of-way before commencement of construction activities within County rights-of-way.

The contractor's exact means and methods are not yet detailed, but the TCP would require provisions to minimize access disruption to residents, businesses, customers, delivery vehicles, and buses to the extent practicable (and where road closures are required during construction, limit to the hours that are least disruptive to access for the adjacent land uses), provisions for 24-hour access by emergency vehicles, and safe vehicular and pedestrian access to local businesses and residences during construction.

There are no forecast changes to school bus routes once BIG is operational.

Land West of Prairie Avenue

BIG does not propose any improvements or modifications for the land west of Prairie Avenue.

I1675-42 The responses to the questions posed by this comment have been grouped and organized with headers below to aid understanding and readability. For purposes of this discussion, the Sylvan Community is comprised of the residences located south of Main Street and generally near/along Amarylis and Sylvan Avenues.

Transportation Concerns Near Sylvan Community

See **Response I1675-27** above for a discussion of BIG's proposed safety improvements along Main Street near Sylvan Avenue and the determination of BIG's traffic operations study area. As noted above, BIG does not propose turn lanes along Main Street at Sylvan Avenue.

As illustrated in **Draft EIR Figure 3-5: BIG Components Overview** (page 3-11), the BIG Specific Plan area does not include the Sylvan Community. BIG does not propose to modify roadways or add vehicle trips in the Sylvan community.

Storm Events

BIG proposes replacing the existing two-lane Main Street low water crossing over Lenwood Channel with a new four-lane bridge that accommodates the 100-year flood condition. BIG proposes to construct a temporary bypass to maintain access along Main Street during Lenwood Channel Bridge reconstruction; see **Draft EIR Figure 3-31: Main Street at Lenwood Channel Bridge Reconstruction** (page 3-80). To maintain access for adjacent residential uses, the temporary Main Street bypass would include private, adjacent residential driveways and would be open for the approximately 18-month bridge reconstruction period. Once the Lenwood Channel Bridge reconstruction is complete, the bypass would be removed and the site restored to its original condition.

Clean Drinking Water

The availability of potable water supplies to serve BIG and other development during normal, dry, and multiple dry years is addressed in **Draft EIR Impact 5.17-2** (pages 5.17-75 to 5.17-80). As concluded on Draft EIR page 5.17-80, Golden State Water Company (GSWC) Barstow's projected supplies would be sufficient to meet all projected water demand in the GSWC Barstow's service area, inclusive of BIG, under current and future conditions, for normal, single-dry, and multiple dry years through 2045; see **Draft EIR Table 5.17 6: Normal, Single, and Multiple Dry Year Water Supply (AF)** (page 5.17-38). Additionally, BIG would comply with the Barstow Code concerning water use, including Barstow Code Chapter 13.40: Water Conservation Plan, which outlines allowed water uses and landscaping watering requirements. Therefore, sufficient potable (construction and operational) water supplies would be available to meet all projected water demand in the GSWC Barstow's service area, inclusive of BIG. The quality of GSWC-provided drinking water would continue to be governed by the **State Water Resources Control Board - Division of Drinking Water**, which enforces both federal and state Safe Drinking Water Acts.

Community Effects

See **Consolidated Response 06** concerning potential effects on communities; **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community; **Consolidated Response 06-03** concerning community safety; and **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor.

I1675-43 The responses to the questions posed in this comment have been grouped and organized with headers below to aid understanding and readability.

Lenwood Channel Bridge

As discussed in the **Draft EIR Section 3.7.10**, BIG proposes to replace the existing two-lane Main Street low water crossing over Lenwood Channel with a new four-lane bridge that accommodates the 100-year flood condition. Main Street would be raised over Lenwood channel, modifying the vertical alignment of Main Street for approximately 0.8 miles. A temporary bypass would be constructed to facilitate the Main Street at Lenwood Channel bridge reconstruction, as shown on **Figure 3-31: Main Street at Lenwood Channel Bridge Reconstruction** (page 3-80). The temporary bypass would include private driveways for nearby residences and would be open for the approximately 18-month bridge reconstruction period.

Main Street

Draft EIR Impact 5.15-1 (pages 5.15-59 to 5.15-60) addresses impacts from BIG construction activities and construction traffic on adjoining and nearby roadways and land uses. BIG construction may involve temporary lane/roadway closures and increased construction traffic. As discussed in Draft EIR Draft EIR pages 59-60, consistent with City standards and construction best practices, BIG's contractor would prepare a detailed Traffic Control Plan (TCP) pursuant to City of Barstow Standard Plan 138 requirements to minimize the impact of construction activities and construction traffic on adjoining and nearby roadways and land uses. A TCP is required for any work in the public right-of-way and would show how to safely manage vehicles, bicyclists, and pedestrians through or around construction zones. The TCP would be prepared in close consultation with the affected land uses, the City, local law enforcement, and fire department officials. The City would review and approve the TCP before commencement of any construction activities. The County would review and approve the TCP portions relevant to work within County rights-of-way before commencement of construction activities within County rights-of-way.

The contractor's exact means and methods are not yet detailed, but the TCP would require provisions to minimize access disruption to residents, businesses, customers, delivery vehicles, and buses to the extent practicable (and where road closures are required during construction, limit to the hours that are least disruptive to access for the adjacent land uses), provisions for 24-hour access by emergency vehicles, and safe vehicular and pedestrian access to local businesses and residences during construction.

Main Street and Country Club Drive/BIG Driveway Traffic Operations

The intersection of Main Street and Country Club Drive/BIG Driveway is forecast to operate at LOS A/A under Opening Year 2028 Plus BIG conditions (LOS A/B under Horizon Year 2048 Plus BIG Conditions) (Draft EIR Appendix 5.15 BIG-2 page 208, 235). As noted in Draft EIR **Appendix 5.15 BIG-2 Table 11: Level of Service and Average Vehicular Control Delay Definition for Signalized and Unsignalized Intersections** (page 59), LOS A describes primarily free-flow operation and LOS B describes reasonably unimpeded operation. The proposed signalized intersection is forecast to operate well and create minimal delay for roadway users along Main Street.

School Buses

Draft EIR Impact 5.15-1 (pages 5.15-59 to 5.15-60) addresses impacts from BIG construction activities and construction traffic on adjoining and nearby roadways and land uses. BIG construction may involve temporary lane/roadway closures and increased construction traffic. Temporary modifications to school bus routes/stops during BIG's construction may be required. If any modifications were to occur, they would be determined during the construction phase and closely coordinated with the City and relevant schools.

As discussed in Draft EIR Draft EIR pages 59-60, consistent with City standards and construction best practices, BIG's contractor would prepare a detailed Traffic Control Plan (TCP) pursuant to City of Barstow Standard Plan 138 requirements to minimize the impact of construction activities and construction traffic on adjoining and nearby roadways and land uses, including school bus activities. A TCP is required for any work in the public right-of-way and would show how to safely manage vehicles, bicyclists, and pedestrians through or around construction zones. The TCP would be prepared in close consultation with the affected land uses, the City, local law enforcement, and fire department officials. The City would review and approve the TCP before commencement of any construction activities. The County would review and approve the TCP portions relevant to work within County rights-of-way before commencement of construction activities within County rights-of-way.

The contractor's exact means and methods are not yet detailed, but the TCP would require provisions to minimize access disruption to residents, businesses, customers, delivery vehicles, and buses to the extent practicable (and where road closures are required during construction, limit to the hours that are least disruptive to access for the adjacent land uses), provisions for 24-hour access by emergency vehicles, and safe vehicular and pedestrian access to local businesses and residences during construction.

There are no forecast changes to school bus routes once BIG is operational.

EIR Process

How long until commenters receive responses to their written comments/questions? – Responses are provided herein as part of the Final EIR. See **Consolidated Response 01-02** concerning the Draft EIR public review period. **Consolidated Response 01-02** contains time periods for various Project components. Commenters will receive responses to their comments with publication of the Final EIR which will be posted to the City website prior to City Planning Commission and City Council hearings.

How will commenters be notified of the answers to their comments? The Final EIR was posted to the City website, and notification was posted to the local newspaper.

How long will the public have to review the responses? The public can review the responses provided in **Final EIR Section 2.0: Comment Letter and Responses** until conclusion of City hearings.

How long until the public hearings after the comment period closes? The first public hearing (Planning Commission) has been scheduled, and notifications were posted to the City website and mailed to interested parties.

Can people speak at the public hearings even if they do not live in the City? Members of the public may attend the public hearings even if they do not live in the City.

How long after EIR approval will construction begin (break ground)? After EIR approval, construction is expected to begin late 2026.

Soil Under Solar Panels

Soil under solar panels would have similar potential for becoming airborne from winds as existing soil, except that the solar farm would include perimeter fencing which would reduce wind effects and minimize soil blowing off-site.

Noise

Draft EIR Section 5.12: Noise, includes the noise analysis required under CEQA following agency-adopted guidelines and thresholds. Noise analysis considered multiple construction or operation-related activities overlapping at once and considered both "windows open" and "windows closed" for nearby homes. Finally, the analysis considered potential mitigation measures (such as sound walls) to mitigate noise impacts, where feasible. Because sound travels in "waves", sound mitigation is most effective when it is placed as close to the source as possible without any gaps. Earthen berms, such as the large slope within the intermodal facility, substantially reduce noise and vibration. While additional noise mitigation was infeasible, the analysis concluded that noise impacts were only significant and unavoidable (above agency thresholds despite mitigation) under the conservative "windows open" condition, where the analysis assumed that nearby homes leave windows open throughout the day. A reader-friendly summary of the environmental impacts is provided on Draft EIR pages 5.12-1 and 5.12-2.

Draft EIR Section 5.12: Noise (pages 5.12-58 and 5.12-59) includes an explanation of impact thresholds and significance criteria, outlining construction noise and vibration thresholds, stationary noise thresholds, transportation noise thresholds, and vibration thresholds. State CEQA Guidelines Appendix G includes questions concerning noise. The issues presented in the Environmental Checklist Form have been used to formulate thresholds of significance in this section. **Draft EIR Table 5.12-28: Maximum BIG Construction Noise Levels at Nearest Sensitive Receptors** (page 5.12-74 and 5.12-75), **Draft EIR Table 5.12-53: Opening Year 2028 Plus BIG Conditions Roadway Traffic Noise Levels** (page 5.12-114), **Draft EIR Table 5.12-54: Interim Year 2033 Plus BIG Conditions Roadway Traffic Noise Levels** (page 5.12-116), **Draft EIR Table 5.12-55: Horizon Year 2048 Plus BIG Conditions Roadway Traffic Noise Levels** (page 5.12-119), **Draft EIR Table 5.12-56: Opening Year 2028 Plus BIG Conditions Roadway Traffic Interior Noise Levels – Windows Open** (page 5.12-121), **Draft EIR Table 5.12-57: Opening Year 2028 Plus BIG Conditions Roadway Traffic Interior Noise Levels – Windows Closed** (page 5.12-122), **Draft EIR Table 5.12-58: Interim Year 2033 Plus BIG Conditions Roadway Traffic Interior Noise Levels – Windows Open** (page 5.12-123), **Draft EIR Table 5.12-59: Interim Year 2033 Plus BIG Conditions Roadway Traffic Interior Noise Levels – Windows Closed** (page 5.12-124), **Draft EIR Table 5.12-60: Horizon Year 2048 Plus BIG Conditions Roadway Traffic Interior Noise Levels – Windows Open** (page 5.12-126), and **Draft EIR Table 5.12-61: Horizon Year 2048 Plus BIG Conditions Roadway Traffic Interior Noise Levels – Windows Closed** (page 5.12-127) provide whether construction and plus BIG conditions

would exceed a threshold. An impact determination based on State CEQA Guidelines Appendix G for noise is provided for **Draft EIR Impacts 5.12-1**, **5.12-2**, and **5.12-3** for BIG in the following pages: 5.12-128 and 5.12-129, 5.12-134, and 5.12-135, respectively.

Air Quality

Draft EIR Section 5.3, Air Quality discusses includes the air quality analysis required under CEQA following agency-adopted guidelines and thresholds. Air quality analysis considered both the "peak day" maximum pollutant concentrations and the annual ("mass") emissions from construction and operation. The analysis accounted for reductions in emissions from certain project benefits such as shifting approximately half of all trains which would bypass BIG farther from nearby homes, replacing the existing switcher locomotives at the existing Barstow Yard with Tier 4 switcher locomotives,[3] increasing the usage of renewable diesel for all trains from the Ports to BIG, and reduction in regional truck traffic. Despite these benefits, BIG would still result in exceedances of agency thresholds in both the "peak day" concentration analysis and the annual emissions analysis. One major reason for this is that the agency thresholds are the same for any development project. In other words, BIG's air quality impacts are analyzed against the same thresholds as a shopping center, residential development, or even single commercial building. Thus, despite these benefits, due to BIG's scale, emissions still exceed agency thresholds. Thus, the analysis considered potential mitigation measures (such as additional zero-emission components such as locomotives beyond those already included). However, as summarized in **Consolidated Response 05-06** concerning the feasibility of specific technology and other mitigation measures, these components are not commercially ready and still must go through substantial testing and development before being potentially viable. Thus, the analysis concluded that air quality impacts would remain significant and unavoidable. A reader-friendly summary of the environmental impacts is provided on Draft EIR pages 5.3-2 and 5.3-3.

1675-31, I1675-40, and I1675-42 See **Consolidated Response-02** concerning the role of social and economic issues under CEQA, **Consolidated Response 06-05** concerning decreased property values; **Consolidated Response 06** concerning potential effects on communities; **Consolidated Response 02** concerning significant and unavoidable impacts and the Statement of Overriding Considerations; and **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community.

I1675-32 See **Consolidated Response 06** concerning potential effects on communities; **Consolidated Response 06-04** concerning quality of life; and **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community.

I1675-37 BIG proposes a 21-megawatt solar farm at the BIG Specific Plan area's southeast corner, south of the intersection of Main Street at Country Club Drive; see **Draft EIR Section 5.1** (page 5.1-22 and pages 5.1-55 through 5.1-57). The solar farm would be a private utility owned and operated by BNSF Railway to generate power for on-site rail operations, and it is proposed on

[3] "Tier 4" is the strictest standard of emissions outputs set by the U.S. Environmental Protection Agency.

a site currently occupied by the private Depue Airport, an uncontrolled airstrip not open to the public. Regarding visual impacts, the analysis found (Draft EIR page 5.1-2) that BIG, including the solar farm, would alter the visual character of western Barstow and that even with the incorporation of mitigation measures, BIG would result in significant and unavoidable impacts concerning aesthetics and light and glare. A Solar Farm Glare Study was prepared to support this analysis and is included in **Draft EIR Appendix 5.1 BIG-**. With respect to the commenter's concern about residential screening, Barstow Code § 19.06.030, cited in the Aesthetics chapter's regulatory framework (**Draft EIR Section 5.1.2: Regulatory Setting**), establishes fence and wall requirements intended to provide buffering between different land uses on a project site. The Draft EIR does not include provisions for fence height waivers on neighboring private properties. See **Consolidated Response 06** concerning potential effects on communities; **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community; and **Consolidated Response 09-05** concerning consideration of the Sylvan Community in the lighting analysis.

COMMENT LETTER I1676

I1676

January 2, 2026 5.1 Aesthetics dEIR Response

To the City of Barstow, Planners, BNSF Railway:

My name is Sherry Baily, and I live **directly adjacent to the proposed Barstow International Gateway (BIG) project site.** I am submitting this comment for Section 5.1 Aesthetics of the EIR report and to publicly record the Sylvan Avenue Community–Specific Aesthetic Impacts. I1676-1

Based on the Draft EIR's description of existing conditions and project features, the Sylvan Avenue Community — the closest residential neighborhood to the BIG site — will experience the following:

1. Loss of Desert Views

The EIR states the BIG site is currently vacant desert with open views. What it lacks to represent is the long-term residential community of Sylvan Ave and neighboring streets. We are zoned for **rural living, with acreage and homeowners with outdoor living spaces**. For the Sylvan Avenue Community, these views of the mountains and Mojave River will be replaced by: I1676-2

Rail yards
Swapping Yards
Warehouses
Massive Industrial Cranes
Industrial structures
Solar farm

This is a complete transformation of the visual environment.

2. Severe Nighttime Light Pollution

The EIR admits the project will cause significant and unavoidable light and glare impacts. For the Sylvan Avenue Community, this means: I1676-3

24-hour industrial lighting
High-mast yard lights
Solar farm glare
Loss of dark skies

This is a 100% increase in light pollution for the Sylvan Ave Community.

3. Industrialization of a Rural Residential Setting

The EIR describes the area as "primarily vacant, undeveloped land" with scattered rural homes nearby. The fact is that there are long-time established communities here. The Sylvan Avenue Community is one of those neighborhoods. The project introduces: I1676-4

Massive built structures
Continuous movement of trains and equipment in a quiet rural community.
Bright lighting

Industrial dominance over residential sightlines

I1676-4 cont'd

We chose to live where life is quieter and calm. Our dirt roads connect neighbors and generations of families. This will significantly impact our health, lifestyle, safety and our homes.

4. Long-Term Construction Impacts
Construction will involve:

Grading
Heavy equipment
Stockpiles
Temporary lighting
Dust and disturbed soils

I1676-5

These impacts will last for years, but the EIR does not analyze how they affect the Sylvan Avenue Community specifically.

II. **Please note there are CEQA Deficiencies in the Aesthetics Analysis**
The Draft EIR fails to meet several CEQA requirements:

I1676-6

1. **No Visual Simulations From The Sylvan Avenue Community**
CEQA requires analysis from representative public viewpoints.
The EIR provides no simulations from Sylvan Avenue, despite resident requests.

2. **Failure to Identify The Sylvan Avenue Community as a Sensitive Viewer Group**
CEQA requires analysis of impacts on residential viewers.
The EIR does not identify Sylvan Avenue residents as sensitive receptors.

I1676-7

3. **No Quantitative Light Trespass Analysis**
The EIR admits significant light impacts but does not:
Measure light trespass at Sylvan Avenue homes
Analyze nighttime lighting effects on sleep
Evaluate solar farm glare on nearby residents

I1676-8

This violates CEQA's requirement for substantial evidence.

4. **No Analysis of Visual Character Change for Existing Neighborhoods**
CEQA requires analysis of compatibility with existing visual character.
The EIR does not evaluate how BIG industrializes the Sylvan Avenue's Community rural setting.

I1676-9

5. **No Cumulative Aesthetic Impact Analysis**
The EIR does not analyze the cumulative effects of:

Existing BNSF rail yard
Highway lighting

I1676-10

New BIG facilities-new rail lines, swap yard, warehouses, increased road traffic, etc. I1676-10 cont'd

This is a major CEQA omission.

6. **No Alternatives Designed to Reduce Aesthetic Impacts on The Sylvan Avenue Community**

CEQA requires alternatives that avoid or reduce significant impacts. The EIR does not evaluate: I1676-11

Relocating lighting
Increasing setbacks
Visual buffers
Height reductions
Solar farm relocation

7. No Site-Specific Mitigation

Mitigation is generic and not tailored to The Sylvan Avenue Community. I1676-12

III. **Questions for the City of Barstow**

A. Visual Simulations & Viewpoints

Why did the City fail to include visual simulations from the Sylvan Avenue Community, the closest residential neighborhood to the project site? I1676-13

Will the City commit to producing supplemental visual simulations from the Sylvan Avenue Community before certifying the EIR? I1676-14

B. Sensitive Viewers

Why does the EIR not identify the Sylvan Avenue Community residents as a sensitive viewer group under CEQA? I1676-15

What criteria did the City use to exclude the Sylvan Avenue Community from the viewer sensitivity analysis? I1676-16

C. Light & Glare

Why does the EIR not include a quantitative light trespass analysis for the Sylvan Avenue Community homes? I1676-17

What is the expected nighttime illumination level at the highest elevation for Sylvan Avenue Community residences? I1676-18

How will the City ensure compliance with its own lighting ordinance for a 24-hour industrial facility? I1676-19

D. Visual Character

Why does the EIR not analyze the change in visual character for the Sylvan Avenue Community, despite CEQA requiring the evaluation of impacts on existing neighborhoods? I1676-20

What measures will the City take to preserve residential visual character?	I1676-21
E. Alternatives Why were no alternatives developed to reduce aesthetic impacts on The Sylvan Avenue Community?	I1676-22
Will the City prepare a Supplemental EIR with alternatives that reduce visual, lighting, and character impacts?	I1676-23
IV. **Questions for BNSF Railway**	
A. Lighting What is the maximum height of the high-mast lighting proposed for the intermodal yard?	I1676-24
Will BNSF commit to full cutoff fixtures and shielding to prevent light trespass onto the Sylvan Avenue Community?	I1676-25
What is the expected nighttime brightness (in foot-candles) at the property line nearest the Sylvan Avenue Community, to include the highest elevation residences?	I1676-26
B. Visual Barriers Why does the project not include vegetative buffers, berms, or visual screening along the Sylvan Avenue Community edge?	I1676-27
Will BNSF commit to installing visual barriers that meet or exceed Caltrans and County standards?	I1676-28
C. Solar Farm Glare What glare modeling was performed for the solar farm in relation to neighboring communities?	I1676-29
Will BNSF commit to anti-reflective coatings or alternative panel orientations?	I1676-30
D. Construction Impacts What is the expected duration of construction activities visible from the Sylvan Avenue Community?	I1676-31
How will BNSF minimize nighttime construction lighting near residential areas? Or will construction not be allowed during the hours of 10 p.m. to 7 a.m.?	I1676-32
E. Long-Term Operations What operational lighting levels will be maintained during overnight hours?	I1676-33
Will BNSF commit to dimming protocols or curfews for non-essential lighting?	I1676-34
The Draft EIR acknowledges that BIG will cause significant and unavoidable aesthetic impacts; yet, it fails to analyze or mitigate the unique, disproportionate, and permanent impacts on the Sylvan Avenue Community residents.	I1676-35

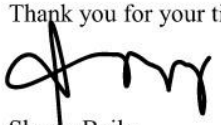
If the Sylvan Ave Community is to carry the burden, the implications of this International Gateway Project, which is poised to establish the precedent for the future logistics of goods—regionally, nationally, and at the Federal, State, County, and City levels—then the health of our community must become a paramount consideration.

I1676-35 cont'd

I respectfully request that the City of Barstow and BNSF respond to these questions in writing and commit to a community-centered process as this project consideration moves forward.

I1676-36

Thank you for your time and consideration.



Sherry Baily
Sylvan Ave Community

RESPONSE TO COMMENT LETTER I1676, SHERRY BAILY 2OF13

I1676-1 This comment is introductory to the comments that follow. See **Consolidated Response 04** concerning general non-CEQA issues.

I1676-2 See **Draft EIR Section 5.1: Aesthetics** concerning BIG's potential visual impacts. The study areas used to assess BIG's aesthetic impacts is the BIG Specific Plan Area and off-site improvement areas plus a fixed 3.0-mile buffer to account for the visibility of BIG's footprint components from adjacent vantage points, and to consider the area's landforms (topography), land cover (vegetation and structures), and atmospheric conditions (dust, fog, precipitation) that can affect visibility. The Sylvan Community is included in this 3.0-mile buffer area. See Draft EIR page 5.1-25 concerning potential adverse effects on a scenic vista. As discussed in **Draft EIR Impact 5.1-1** (page 5.1-25), neither the Countywide Plan nor the proposed General Plan designate any scenic vistas that involve or are near the BIG Aesthetics study area, including the three identified landscape units. Because there are no scenic vistas in the BIG Aesthetics study area, BIG would not have an adverse effect on a scenic vista. Therefore, no impact to scenic vistas would occur, and no mitigation is required. **Draft EIR Impact 5.1-2** (page 5.1-27) provides analysis concerning any potential impacts to scenic resources including trees, rock outcroppings, and historic buildings within a state scenic highway. It is mentioned that there are no notable trees or rock outcroppings within or near the BIG Specific Plan area. Therefore, BIG would not substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a State Scenic Highway, and a less than significant impact would occur in this regard. However, see **Response I1676-6** concerning the Draft EIR's determination that BIG's impacts on visual character and public views in non-urbanized areas would be significant and unavoidable at Visual Simulation 9, considered to be representative of the Sylvan Community, despite incorporation of **MM BIG AES-1**. This finding is based on BIG's proposed uses, including a rail yard with rail tracks, intermodal facility, and block swap yard, a solar farm, and a transload warehouse center, which would be slightly-above or above grade and substantially degrade the site and area's visual character (Draft EIR page 5.1-62).

I1676-3 See **Consolidated Response 09-05** concerning consideration of the Sylvan Community in the lighting analysis. In addition, see the following responses concerning 24-hour industrial lighting, high-mast yard lights, solar farm glare, and loss of dark skies:

- **24-hour industrial lighting:** See **Draft EIR Impact 5.4-1** (pages 5.4-62 through 5.4-95) concerning light and glare associated with BIG. As discussed on Draft EIR page 5.1-75, nighttime lighting disturbances such as glare, light pollution, and glow affecting viewers, visual character, and visual quality would result from BIG operations and built features. Glare impacts would be reduced in these locations by utilizing lighting with high-efficiency technologies, dark-sky cutoffs, strategic orientation to avoid light trespass into adjacent properties and open space areas, and appropriate shielding or recesses to avoid glare and reflections. **Mitigation Measure (MM) BIG AES-1** requires the preparation and implementation of a Construction Lighting and Screening Plan (CLSP) that requires visual

screening (i.e., temporary fencing). Additionally, the CLSP is required to identify and implement lighting treatments for all construction work areas (i.e., maximum brightness values not to be exceeded by artificial bulbs, screening around BIG's footprint to limit light and glare, and use of non-reflective glass. The CLSP would also identify methods used to ensure construction lighting is directional (aimed toward work areas and away from nearby sensitive receptors) and limited to sufficient wattage for safety and security. However, visual degradation caused by necessary nighttime and daytime lighting of features during BIG operations, including visually apparent barriers, signage, contrasting signal lighting, and the residual glare impacts would remain potentially significant. Similarly, as BIG would operate 24 hours a day, BIG would introduce new significant light pollution and glow impacts during nighttime hours. See **Consolidated Response 02** concerning significant and unavoidable impacts and the Statement of Overriding Considerations.

- **High-mast yard lights: Draft EIR Section 5.1 Aesthetics** page 5.1-71 states that BIG light sources that could result in glare include rail yard buildings, light masts and equipment, transload warehouse center buildings, street and parking lot lighting, landscape lighting, illuminated signs, exterior lighting on lamps and buildings, solar farm, and automobile lighting (headlights). See **Consolidated Response 02** concerning significant and unavoidable impacts and the Statement of Overriding Considerations. See **Response I1676-3 (24-hour industrial lighting)** concerning potential light and glare impacts to the Sylvan Community.
- **Solar farm glare: Draft EIR Appendix 5.1 BIG-2 Solar Farm Glare Study** addresses the potential for solar farm glare to be directed onto nearby properties or roadways. It assessed 39 observation points representing nearby residences; see Attachment A: Array, Receptor, and Obstruction Component Locations of **Appendix 5.1 BIG-2 Solar Farm Glare Study**. The following four observation points were identified within the Sylvan Community:
    - OP-32 located approximately 825 feet northeast of the intersection of Gazana Street and Sylvan Avenue;
    - OP-33 located approximately 991 feet northeast of the intersection of Gazana Street and Sylvan Avenue;
    - OP-34 located approximately 1,215 feet northeast of the intersection of Gazana Street and Sylvan Avenue; and
    - OP-35 located approximately 565 feet northeast of the intersection of Gazana Street and Sylvan Avenue.

Of the 39 observation points, the analysis found only one (1) instance of "yellow" glare occurring for a residence identified as OP-37, which was determined to have minimal or no existing visual obstructions. BIG proposes a six-foot privacy fence around the solar farm arrays. This visual screening would further reduce or eliminate glare identified by acting as a

visual obstruction. BIG would not require any mitigation measures. The analysis found that Sylvan Community observation points OP-32 through OP-35 would not experience glare impacts.

Additionally, 12 path receptor routes were assessed (i.e., 11 nearby roadways and one (1) nearby railway), including Routes 5 and 11, which traversed the Sylvan Community. The analysis found only one (1) instance of "yellow" glare was noted occurring for southbound traffic on Country Club Drive, which was determined to have minimal or no existing visual obstructions. BIG proposes a six-foot privacy fence around the solar farm arrays. This visual screening would further reduce or eliminate glare identified by acting as a visual obstruction. BIG would not require any mitigation measures. Routes 5 and 11 would not experience solar farm glare impacts. As such, potential significant and unavoidable impacts from solar farm glare are not anticipated at the Sylvan Community.

- **Loss of dark skies:** See **Response I1676-3 (24-hour industrial lighting)** concerning potential light and glare impacts to dark skies**.** In addition to this, BIG would comply with San Bernardino County Municipal Code Chapter 83.07 (d) Dark Sky Curfew, which states that all outdoor lighting shall be extinguished by 11:00 PM, close of business, or when people are no longer present in exterior areas, whichever is later, except for the following:

    (i) Lighting used for entry and exit points of a structure, parking areas, driveways and driveway ingress/egress points; or

    (ii) Lighting activated by a motion sensor that extinguishes no later than five minutes after activation.

See **Consolidated Response 02** concerning significant and unavoidable impacts and the Statement of Overriding Considerations.

I1676-4 **Draft EIR Section 3.0 Project Description** page 3-18 describes the BIG Specific Plan area as primarily vacant undeveloped land, which is traversed by BNSF's existing mainline, and which contains scattered agricultural, residential, commercial, and industrial land uses. The BIG Specific Plan area is mostly devoid of tall vegetation and trees, with structures and other elements of the built environment scattered throughout. This description was determined through a Phase I Environmental Site Assessment found in **Draft EIR Appendix 5.9 BIG-1 Hazards.** The Sylvan Community is included within the description of nearby residential land uses.

- **Massive built structures:** See **Draft EIR Section 5.1: Aesthetics** for an analysis concerning potential impacts to visual character or quality of public views of the site and its surroundings. As discussed on Draft EIR page 5.1-30, The BIG Specific Plan would include a rail yard with an intermodal facility, a block swap yard, and ancillary rail areas, and a solar farm that would include solar panels and an electrical substation.

    These improvements would adhere to the Specific Plan's development regulations found in BIG Specific Plan Chapter 3: Development Regulations and design guidelines found in

BIG Specific Plan Chapter 4: Design Guidelines, which are designed to minimize potential visual impacts. These regulations/guidelines address building height restrictions, lighting standards, screening, and improved landscaping. BIG would introduce more urban structures and infrastructure to the BIG aesthetics study area, resulting in a permanent change to the visual character of the site and its surroundings. As such, BIG would substantially degrade the existing visual character or quality of public views of the site and its surroundings resulting in a significant unavoidable impact. See **Consolidated Response 02** concerning significant and unavoidable impacts and the Statement of Overriding Considerations

- **Continuous movement of trains and equipment in a quiet rural community:** See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses.
- **Bright lighting.** See **Response 11676-3** concerning potential light impacts on the Sylvan Community.
- **Industrial dominance over residential sightlines.** See **Response 1676-2** and **Response I1676-6** concerning potential visual impacts of BIG on the Sylvan Community.

See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 06-04** concerning quality of life, **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community, **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor, **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis, and **Consolidated Response 09-06** concerning consideration of cumulative impacts to the Sylvan Community.

I1676-5 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 06-04** concerning quality of life, **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community, and **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor. The **Draft EIR Section 3.0: Project Description** (pages 3-86 through 3-90) describes BIG Project construction. Construction impacts concerning grading, heavy equipment, stockpiles, dust and disturbed soils, and temporary lighting are addressed as follows:

- **Grading**. Demolition and grading are discussed in detail in **Draft EIR Section 3.0** (page 3-87). Construction impacts concerning grading are discussed in **Draft EIR Section 5.3: Air Quality** (pages 5.3-84 to 5.3-87 and pages 5.3-124 to 5.3-127). Additionally, **Draft EIR Table 5.3-6: BIG Construction Schedule** (page 5.3-35) shows that multiple grading phases were evaluated. Grading emissions are included in the construction emissions shown on **Draft EIR Table 5.3-19: Unmitigated Construction Emissions (pounds per day)** through **Table 5.3-22: Mitigated Construction Emissions (tons per year)** (pages 5.3-84 to 5.3-88).

The Draft EIR identifies **MM BIG AQ-1** to control fugitive dust emissions from all construction activities including grading. MDAQMD also regulates grading dust emissions with Rule 403; see Draft EIR LOR AQ-1 (pages 5.3-101 to 5.3-102).

Localized air quality impacts, including those from grading are analyzed on Draft EIR pages 5.3-124 through 5.3-126. The localized impact analysis evaluates pollutant concentrations at various locations including the Sylvan Community. The Draft EIR acknowledges that the localized air quality impacts are limited to construction PM10 at a small location along the fence line within the Main Street and Mockingbird Street intersection right-of-way and would not impact sensitive receptors; see **Draft EIR Figure 5.3-5: Construction Mitigated 24-Hour PM10 Pollutant Concentration Isopleth** (page 5.3-127). The Draft EIR conservatively determined that this would be a significant and unavoidable impact with mitigation (mitigated operational localized air quality impacts would be less than significant; see **Draft EIR Table 5.3-31: Maximum Off-Site Concentration from Operations (Mitigated)** (page 5.3-130). The Draft EIR further identifies and incorporates mitigation measures to minimize construction dust and operational emissions. Even with these measures, the Draft EIR transparently concludes that some impacts would remain significant and unavoidable, consistent with CEQA disclosure requirements. MDAQMD has commented on the DEIR and agreed that the Draft EIR included all feasible mitigation; see **Responses to Comment Letter L3**. As noted above, this impact would not occur at Sylvan Community receptors; see also **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis.

- **Heavy Equipment**. Heavy-duty construction equipment is discussed in **Draft EIR Section 5.3: Air Quality** (pages 5.3-84 through 5.3-87), acknowledging that construction results in the temporary generation of emissions resulting from demolition, site grading, road paving, motor vehicle exhaust associated with construction equipment and worker trips, and the movement of construction equipment, especially on unpaved surfaces. Maximum daily construction generated emissions for BIG are summarized in **Draft EIR Table 5.3-19: Unmitigated Construction Emissions** (page 5.3-84) and **Draft EIR Table 5.3-20: Unmitigated Construction Emissions (tons per year)** (page 5.3-85); also see **Draft EIR Appendix 5.3 BIG-1**.

  Draft EIR Table 5.3-19: Unmitigated Construction Emissions (pounds per day) (page 5.3-84) and **Draft EIR Table 5.3-20: Unmitigated Construction Emissions (tons per year)** (page 5.3-85) show that unmitigated construction emissions would exceed the MDAQMD thresholds for VOC, NOX, CO, PM10, and PM2.5 construction thresholds despite compliance with applicable laws, ordinances, and regulations (LORs). The majority of emissions would occur from off-road equipment exhaust. Additionally, VOC emissions occur from architectural coating and paving activities. BIG would also be required to comply with the following mitigation measures to lower construction emissions: **MM BIG AQ-1** which requires controls for fugitive dust emissions; **MM BIG AQ-2** which requires all architectural coatings to be super-compliant low VOC paints, consisting of no more than 10 grams per liter of VOC; **MM BIG AQ-3** which requires construction equipment to

meet CARB Tier 4 Final emissions standards; and **MM BIG AQ-4** which requires the use of renewable diesel fuel during construction. Furthermore, **MM BIG AQ-5 r**equires on-road construction trucks to have an average fleet mix of model year 2010 or newer (no less than the average fleet mix for the current calendar year as set forth in the EMFAC2021 database) and **MM BIG AQ-6** requires emissions controls for concrete batch plants such as reduction of fugitive dust.

Mitigated construction emissions are shown in **Draft EIR Table 5.3-21: Mitigated Construction Emissions (pounds per day)** (page 5.3-86) and **Draft EIR Table 5.3-22: Mitigated Construction Emissions (tons per year)** (page 5.3-87). Despite the implementation of mitigation measures, due to the size of BIG, emissions would remain above MDAQMD's thresholds; see **Draft EIR Table 5.3-15: MDAQMD Emissions Thresholds** (page 5.3-64). Construction impacts would be significant and unavoidable despite implementation of **MM BIG AQ-1** through **MM BIG AQ-6**.

- **Stockpiles and Dust and Disturbed Soils**. Construction impacts pertaining to dust and material stockpiles are discussed in **Draft EIR Section 5.7: Geology, Soils, and Mineral Resources** (page 5.7-52), noting if exposed soils are not protected from wind or water erosion, such as when vegetation is cleared for work areas and material stockpiles, both the exposed work areas and any stockpiles could erode and result in decreased air and water quality and loss of high-value soil. Therefore, during construction, BIG's components in the City and annexation areas would comply with Barstow Code Chapter 15.12 – Grading, which requires that BMPs be incorporated into a grading plan. The off-site improvement areas that would not be annexed would be required to comply with County erosion control measures that are incorporated into an erosion control plan. Construction-related soil erosion can be minimized through adherence to relevant transportation and building agency guidelines and standards, previously described in **Draft EIR Impact 5.7-1** (pages 5.7-43 through 5.7-46), and through design measures including implementation of BMPs. BIG would also implement a dust control plan in accordance with the Mojave Desert Air Quality Management District rules and regulations to minimize wind erosion in the BIG footprint. Standard construction practices that would consider the soil properties and minimize soil erosion hazards include soil stabilization, watering for dust control, perimeter silt fences, and sediment basins. Implementation of local and State regulations regarding soil erosion, such as stormwater BMPs and temporary soil erosion guidelines, would be followed during BIG design and construction. Design measures would minimize wind and water erosion through the adoption of BMPs, including use of stabilizers, mulches, revegetation, and covering areas with biodegradable geotextiles. Therefore, BIG construction would result in a less than significant impact concerning soil erosion and the loss of topsoil; no mitigation is required. See also **Consolidated Response 09-10** concerning consideration of the Sylvan Community in the Hazardous Materials analysis, including arsenic levels/mobilization.
- **Construction Noise.** BIG's construction noise impacts are discussed in **Draft EIR Section 5.12: Noise and Vibration** (pages 5.12-74 through 5.12-81). BIG daytime construction

noise levels would reach a maximum of 84.2 dBA Leq (8-hour) during 33 kV Line construction and would exceed the FTA's 80 dBA Leq (8-hour) daytime construction noise standard for residential uses in only one construction area: the 33 kV line (see Draft EIR **Table 5.12-28: Maximum BIG Construction Noise Levels at Nearest Sensitive Receptors** (page 5.12-74 and 5.12-75). Noise levels from all other construction areas/activities would not exceed the FTA's daytime standard. In addition, the combined noise level from simultaneous construction activities at all construction areas would reach a maximum of 84.4 dBA Leq (8- hour) and would exceed the FTA 80 dBA Leq (8-hour) daytime noise standard. Due to the nature of 33 kV line construction activities, the only potential mitigation to reduce construction noise levels would be to construct a temporary noise barrier to block the line of sight from the construction area to the nearest residences. However, to attenuate noise levels below 80 dBA at the impacted residences, the temporary noise barrier would have to constantly be moved, re-oriented, and properly positioned as construction activities move along the 7.5-mile 33 kV line route. In addition, a temporary noise barrier placed between the 33 kV line construction area and the impacted residences could create vehicle/pedestrian access issues at residential properties. As such, temporary noise barriers for construction of the 33 kV line would be considered infeasible mitigation, and a significant and unavoidable construction noise impact would occur. BIG nighttime construction noise levels associated with the east lead tracks, Lenwood Channel improvements, and 33 kV line would exceed the FTA's 70 dBA Leq (8-hour) nighttime construction noise standard for residential uses. Noise levels from the other construction areas/activities would not exceed the FTA's nighttime standard. As previously noted, the combined noise level from simultaneous construction activities at all construction areas would reach a maximum of 84.4 dBA Leq (8- hour) and would exceed the FTA 70 dBA Leq (8-hour) nighttime noise standard. BIG would incorporate **MM BIG NOI-1**, which requires preparation of a Construction Noise Logistics Plan to reduce nighttime construction noise levels. While incorporation of **MM BIG NOI-1** would reduce nighttime construction noise levels to the extent feasible, the precise details regarding the proposed schedule, duration/hours, equipment type/quantity, and specific location of construction for nighttime construction activities are unknown at this time. Therefore, despite incorporation of noise reduction measures (to be included in the Construction Noise Logistics Plan), nighttime construction noise levels could still exceed the FTA's 70 dBA Leq (8-hour) for residential uses. Therefore, BIG nighttime construction noise could result in a significant and unavoidable impact despite incorporation of **MM BIG NOI-1**.

- **Temporary Lighting**. Construction lighting, or temporary lighting, is discussed in **Draft EIR Section 5.1: Aesthetics** (pages 5.1-65 and 5.1-66). Some nearby land uses, such as residential uses, are considered light-sensitive because occupants have expectations of minimal lighting during nighttime hours and may be subject to disturbance by bright light sources. The light-sensitive receptors near BIG are the rural residential uses interspersed to the south, east, and west of BIG's footprint, including the Sylvan Community. The light-sensitive receptors nearest the BIG footprint are single-family residential uses approximately 120 feet southeast of BIG. Light exposure from construction activities can

be a nuisance to adjacent residential areas, diminish the clear night sky's view and, if uncontrolled, can cause disturbances. The degree of impacts from light exposure would vary widely depending on the amount of light generated, light sources heat, presence of barriers/obstructions, type/design of light source, and weather conditions. Given BIG construction would occur over approximately 34 months requiring nighttime construction activities, BIG construction activities would create a new source of substantial light and glare that would adversely affect nighttime views in the area. To reduce construction-related light exposure impacts, **MM BIG AES-1** requires the preparation and implementation of a Construction Lighting and Screening Plan (CLSP) that requires visual screening (i.e., temporary fencing). Additionally, the CLSP is required to identify and implement lighting treatments for all construction work areas (i.e., maximum brightness values not to be exceeded by artificial bulbs, screening around BIG's footprint to limit light and glare, and use of non-reflective glass. The CLSP would also identify methods used to ensure construction lighting is directional (aimed toward work areas and away from nearby sensitive receptors) and limited to sufficient wattage for safety and security. Construction lighting would be temporary and cease upon BIG completion. Despite mitigation under **MM BIG AES-1**, BIG's impacts related to temporary lighting during construction would remain significant and unavoidable.

I1676-6 See **Consolidated Response 06** concerning potential effects on communities. An analysis of BIG's impacts to visual character and public views in non-urbanized areas is included in **Draft EIR Impact 5.1-3** (pages 5.1-30 through 5.1-63). CEQA does not require analysis of views from private property. As previously discussed, the Sylvan Community is included in the study area associated with **Draft EIR Section 5.1 Aesthetics**. The study area is defined as the BIG Specific Plan Area and off-site improvement areas plus a fixed 3.0-mile buffer; see Draft EIR page 5.1-10.

The BIG aesthetics study area is comprised of three landscape units defined as the Western Landscape Unit (LU-1), Central Landscape Unit (LU-2), and Eastern Landscape Unit (LU-3) as shown in **Draft EIR Figure 5.1-1: Aesthetics Study Area and Key Viewpoint Location Map – BIG** (page 5.1-11). The Sylvan Community is located in the LU-2. **Draft EIR Figure 5.1-1: Aesthetics Study Area and Key Viewpoint Location Map – BIG** (page 5.1-11) also depicts the locations of the visual simulations included in the analysis to determine if BIG would substantially degrade the existing visual character or quality of public views of the site and its surroundings (public views are those that are experienced from publicly accessible vantage point); see **Draft EIR Impact 5.1-3** (pages 5.1-30 to 5.1-63). As shown on **Draft EIR Figure 5.1-1: Aesthetics Study Area and Key Viewpoint Location Map – BIG** (page 5.1-11)**,** the nearest visual simulation to the Sylvan Community is **Visual Simulation 9 (VS-9)**, located approximately 860 feet northeast of Main Street and Sylvan Avenue. VS-9, which is facing northwest from the southwest corner of the intersection of Main Street and Amarylis Avenue, is analyzed as a worst-case representation of BIG's effects, including the Sylvan Community. As depicted on **Draft EIR Figure 5.1-21: Existing View of Mojave Desert at the Southwest Corner of Main Street at Amarylis Avenue (facing northwest)** (page 5.1-60), the existing

visual character and quality of VS-9 is primarily Mojave Desert landscape. VS-9 is considered representative of the impacts to the Sylvan Community because it is located north of and closer to the BIG Specific Plan area.

As depicted in **Draft EIR Figure 5.1-22: Visual Simulation 9: BIG Operations** at the Southwest Corner of Main Street at Amarylis Avenue (facing northwest) (page 5.1-61), BIG would alter the existing visual environment as seen from the intersection of Main Street and Amarylis Avenue facing northwest by replacing desert vegetation with the transload warehouse center. The transload warehouse center would be visible from Main Street. The introduction of the transload warehouse center would substantially degrade the existing visual character or quality of public views of the site and its surroundings. However, the railyard is designed to be lower than Main Street via a grade difference, which would lessen potential aesthetic impacts. The analysis found (Draft EIR page 5.1-59) that because a visual change of one or more categories would occur in an area that would change from an existing moderate-high viewer sensitivity level to a high viewer sensitivity level with incorporation of BIG, the visual quality impact is considered to be significant. BIG would introduce more urban structures and infrastructure to the BIG aesthetics study area, resulting in a permanent change to the visual character of the site and its surroundings. As such, BIG would substantially degrade the existing visual character or quality of public views of the site and its surroundings, including the Sylvan Community, resulting in a significant unavoidable impact. See **Consolidated Response 02** concerning significant and unavoidable impacts and the Statement of Overriding Considerations

I1676-7 See **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor and see **Consolidated Response 06-01** concerning the geographic scope of the environmental analysis and definition of study area, which include the Sylvan Community, and see **Draft EIR Section 5.1: Aesthetics**. As discussed on Draft EIR page 5.1-65, some nearby land uses, such as residential uses, are considered light-sensitive because occupants have expectations of minimal lighting during nighttime hours and may be subject to disturbance by bright light sources. The light-sensitive receptors, including those in the Sylvan Community located approximately 120 feet southeast of BIG, are noted as rural residential uses and are interspersed to the south, east, and west of BIG's footprint.

I1676-8

- **Light trespass at Sylvan Community:** Light trespass is analyzed throughout **Draft EIR Section 5.1: Aesthetics**. The study area for Draft EIR Section 5.1: Aesthetics is shown in **Figure 5.12.6-1: Aesthetics Study Area and Key Viewpoint Location Map – BIG** (page 5.1-11) , which includes the Sylvan Community. See **Draft EIR Section 5.1** (page 5.1-68) for a detailed analysis of Light Trespass. **MM BIG AES-1, Construction Lighting and Screening Plan**, would require identification of lighting practices and systems (e.g., shielded and directional lighting oriented toward work areas and to avoid light trespass onto residential or other sensitive receptor properties) that minimize light pollution, glare, and light trespass, while maintaining nighttime safety, visibility, utility, and productivity

pursuant to Barstow Code § 19.06.010(e) - Light Trespass and Control of Glare concerning trespass of light onto adjacent properties/light-sensitive uses.

- **Nighttime lighting effects on sleep:** BIG's potential impacts to nighttime lighting are addressed in **Draft EIR Impact 5.1-4** (starting on page 5.1-65). The impact conclusion for **Draft EIR Impact 5.1-4** (page 5.1-75) states that nighttime lighting disturbances such as glare, light pollution, and glow affecting viewers, visual character, and visual quality would result from BIG operations and built features. Glare impacts would be reduced in these locations by utilizing lighting with high-efficiency technologies, dark-sky cutoffs, strategic orientation to avoid light trespass into adjacent properties and open space areas, and appropriate shielding or recesses to avoid glare and reflections. However, visual degradation caused by necessary nighttime and daytime lighting of features during BIG operations, including visually apparent barriers, signage, contrasting signal lighting, and the residual glare impacts would remain potentially significant. Similarly, as BIG would operate 24 hours a day, BIG would introduce new significant light pollution and glow impacts during nighttime hours. **MM BIG AES-1** is a feasible mitigation measure; however, it would not reduce impacts to a less than significant and unavoidable level. For this significant and unavoidable impact, See **Consolidated Response 02** concerning significant and unavoidable impacts and the Statement of Overriding Considerations
- **Solar farm glare:** See **Response I1673-3 (Solar farm glare)** concerning BIG's potential impacts related to solar farm glare.

As the analysis was done in compliance with State CEQA Guidelines Appendix G, no violation of CEQA has occurred.

I1676-9 See **Draft EIR Section 5.1** page 5.1-20 for a description of the visual character of BIG and its surroundings and **Draft EIR Impact 5.1-3** (pages 5.1-30 to 5.1-63) for an analysis of BIG's potential impacts to visual character. As mentioned above in **Responses I1676-2**, **-5**, **-6**, **-7**, and **-8**, the Sylvan Community was included within the Study Area for this threshold and was thus included in the analysis for visual character. **Draft EIR Impact 5.1-3** (pages 5.1-30 to 5.1-63) acknowledges that BIG is surrounded by primarily vacant undeveloped land with sparse rural residential uses in the surrounding areas. Therefore, given the rural setting, BIG would be considered to have a significant effect on the environment if it would substantially degrade the existing visual character or quality of public views of the site and its surroundings (public views are those that are experienced from a publicly accessible vantage point). BIG is not in an urbanized area, and therefore, BIG's impacts under this threshold would be examined exclusively under the portion of this threshold that applies to "non-urbanized areas." The threshold concluded that there would be a significant and unavoidable impact despite incorporation of **MM BIG AES-1** because BIG infrastructure would be slightly-above or above grade and would consist of a rail yard with rail tracks, intermodal facility, and block swap yard, a solar farm, and a transload warehouse center that would substantially degrade visual character (page 5.1-62). See **Consolidated Response 02** concerning significant and unavoidable impacts and the Statement of Overriding Considerations.

I1676-10 **Draft EIR Section 6.0: Cumulative Impacts** (pages 6-13 to 6-14) provides a cumulative summary of BIG's potential aesthetics-related impacts.

- **Existing BNSF Railyard:** The commenter states that the Draft EIR does not analyze cumulative effects of the existing BNSF Barstow Railyard (Barstow Yard"). **Draft EIR Table 6-1: Barstow SOI and BIG Footprint Cumulative Projects List** (pages 6-4 and 6-5) lists the existing Barstow Yard; therefore, the **Draft EIR Section 6.0** (page 6-3) analyzes the potential environmental changes to existing physical conditions that may occur as a result of BIG together with the cumulative projects. As discussed in **Draft EIR Section 6.0** (pages 6-13 and 6-14), the Barstow Yard, along with the proposed Logistics Facility, are within the study area for aesthetics. The Logistics Facility is proposed immediately adjacent to BIG, near Lenwood Road within the study area, and also would introduce new additional urban structures, infrastructure and lighting within the study area. Therefore, BIG combined with these applicable cumulative projects would result in a cumulative impact concerning changes to visual character.

  Furthermore, as discussed in **Draft EIR Section 6.0** (page 6-14), given their locations and proximity to BIG, light and glare generated by the Logistics Facility and the Barstow Yard combined with BIG would result in a cumulative impact concerning the creation of light and glare. Because of the order of magnitude of BIG relative to other cumulative development, BIG would result in a cumulatively considerable contribution to significant impacts relative to visual character and light and glare.

  Therefore, no additional analysis is necessary pertaining to the existing Barstow Yard.

- **Highway lighting: Draft EIR Section 6.0** (page 3) notes that cumulative impacts analyzed considered the potential environmental changes to existing physical conditions that may occur as a result of BIG together with the cumulative projects. Cumulative impacts concerning light and glare were considered for BIG in conjunction with the existing physical conditions, which includes existing highway lighting. Therefore, no additional analysis is necessary pertaining to highway lighting.

  The **Draft EIR Section 6.0** (page 6-14), considers impacts to light and glare, noting that the order of magnitude of BIG relative to other cumulative development would result in a cumulatively considerable contribution to significant impacts relative to visual character and light and glare. Potential lighting impacts from BIG are discussed in detail in **Draft EIR Section 5.1.**

- **New BIG facilities:** Potential lighting impacts from BIG facilities and infrastructure improvements are analyzed in detail throughout **Draft EIR Section 5.1.**

I1676-11 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community, and **Consolidated Response 09-11** concerning consideration of alternatives to minimize impacts to the Sylvan Community. Furthermore, alternatives to BIG and their respective potential impacts to aesthetics are analyzed in **Draft EIR Section 8.0: Alternatives.** These include the No BIG

Alternative, Reduced Intensity Alternative, and BIG West Transload Warehouse Center Alternative. See also **Consolidated Response 14** concerning consideration of a range of reasonable alternatives.

In terms of concerns on Project components, the BIG Specific Plan would include a rail yard with an intermodal facility, a block swap yard, and ancillary rail areas, and a solar farm that would include solar panels, and an electrical substation (page 5.1-30). These improvements would adhere to the Specific Plan's development regulations found in **BIG Specific Plan Chapter 3: Development Regulations** and design guidelines found in **BIG Specific Plan Chapter 4: Design Guidelines**, which are designed to minimize potential visual impacts. These regulations/guidelines address building height restrictions, lighting standards, screening, and improved landscaping. However, each of the commenters' concerns pertaining to BIG components are addressed below:

- **Relocating lighting**. BIG proposes the necessary nighttime lighting for operations introducing new light sources, affecting the view during both day and night; however, measures like shielding and strategic lighting orientation would minimize these impacts though some alterations to the visual character and light environment are expected and recognized in in **Draft EIR Section 5.1: Aesthetics** (pages 5.1-2, 5.1-20, and 5.1-65 through 5.1-79). As discussed in pages 5.1-68 through 5.1-70, lighting would be strategically placed to illuminate parking areas, docks/loading zones, and building entries. The locations of the proposed rail yard's lighting and the respective lighting levels from each lighting unit (i.e., luminaire) are illustrated on **Draft EIR Figure 5.1-23: Rail Yard Lighting Plan** (page 5.1-67) and the lighting levels are depicted on **Draft EIR Figure 5.1-24: Light Spill Heat Map** (page 5.1-69). BIG's operational lighting would adhere to the BIG Specific Plan's lighting standards and guidelines detailed in **BIG Specific Plan Chapter 3: Development Regulations** and **Chapter 4: Design Guidelines**, which are designed to meet Barstow Code standards and minimize light trespass onto adjacent properties and light-sensitive land uses. The Draft EIR (page 5.1-74) does recognize that, although BIG would follow the requirements listed above, BIG operations would cause substantial aesthetic degradation from introduction of glare to a minimally illuminated area. The substantial degradation from introduction of glare during BIG operations would conflict with nighttime views and be highly contrasting to the visual character of the surrounding environment. Glare disturbances affecting viewers, visual character, and visual quality would result from BIG operations and built features. BIG would minimize potential glare impacts through compliance with BIG Specific Plan lighting standards as summarized above. However, impacts would remain significant due to the introduction of glare in environment where none currently exists. Given the rural setting and the scale of BIG development, there are no feasible mitigation measures to mitigate glare impacts. Any development within the BIG Specific Plan area would create sources of new glare to an existing rural setting. BIG lighting is necessary for safety and security, thus, cannot be removed from BIG design.
- **Increasing setbacks**. The setbacks associated with the proposed BIG Project would be subject to and consistent with the Barstow International Gateway Specific Plan

Development Regulations; see Chapter 3 of the BIG Specific Plan. As such, setback considerations are included in the Draft EIR. See **Figure 2-26A** and **Figure 2-26B** of the Barstow International Gateway Specific Plan, which depicts the substantial setbacks already incorporated into BIG design.

- **Visual buffers:** Visual buffers are included as part of BIG and are discussed in **Draft EIR Impact 5.1-3** on page 5.1-31. It states that a buffer from loading docks shall be implemented where Transload Warehouse Center operations occur adjacent to existing residential uses. Buffer design shall include one or a combination of the following: fencing, walls, berms and/or slopes. Further, BIG would comply with Barstow Code Chapter 19.06 and Barstow Code § 19.06.030: Fences, Hedges, and Walls. Barstow Code § 19.06.030 section discusses requirements for fences, hedges, and walls, including maximum height limit, walls required between different land uses, special wall/fencing for different uses, and prohibited fence materials. It establishes requirements for fences, hedges, and walls to ensure there is no unnecessary view blockage, provide adequate buffering between different land uses, and provide screening of outdoor uses and equipment. As such, visual buffers are included in the Draft EIR.

- **Height Reductions.** As noted above, building height restrictions would be consistent with the Specific Plan's development regulations found in **BIG Specific Plan Chapter 3: Development Regulations** and design guidelines found in **BIG Specific Plan Chapter 4**: Design Guidelines, which are designed to minimize potential visual impacts. As discussed in **Draft EIR Section 5.1** (page 5.1-31), building heights may exceed the maximum with the appropriate site conditions as approved by the Community Development Director or their designee. As such, building height considerations are included in the Draft EIR.

- **Solar farm relocation:** Solar farm relocation was considered in **Draft EIR Section 8.0: Alternatives** in the BIG Flipped Concept Alternative and the BIG Reduced Flipped Concept Alternative. Under the BIG Flipped Concept Alternative, the spatial arrangement would not permit the rail yard to be adjacent to the solar farm and the transload warehouse center would be owned by a different entity. Therefore, construction of the solar farm under this alternative would not be possible unless the solar infrastructure were to extend approximately 3.0 miles from the solar farm to the rail yard. The additional infrastructure required to support an alternative solar farm location would be infeasible; see **Consolidated Response 05** concerning feasible and enforceable mitigation. However, this alternative would still include rooftop solar on the transload warehouse center. Further, under the BIG Reduced Flipped Concept Alternative, acquisitions would be similar under this alternative to BIG, except that the solar farm would not be constructed. Under BIG, the solar farm is proposed south of Main Street, adjacent to the rail yard. This proposed adjacency addresses CPUC § 218's requirement that a party can only provide on-site solar-generated power to a single adjacent property that it owns or controls, or else the party is designated as a "public utility" or "electrical corporation." Because of the spatial arrangement under this alternative, the rail yard would not be adjacent to the solar farm and the transload warehouse center would be owned by a different entity.

Therefore, construction of the solar farm under this alternative would not be possible unless the solar infrastructure were to extend approximately 3.0 miles from the solar farm to the rail yard. The additional infrastructure required to support an alternative solar farm location would be infeasible; see **Consolidated Response 05** concerning feasible and enforceable mitigation. However, this alternative would still include rooftop solar on the transload warehouse center. These alternatives were considered but ultimately rejected from detailed consideration. Among the factors that may be used to eliminate alternatives from detailed consideration are the alternative's failures to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. It is anticipated that these alternatives that were considered but rejected would not avoid BIG's significant and unavoidable impacts concerning Aesthetics, Air Quality, Cultural Resources, Noise and Vibration, Tribal Cultural Resources, and Utilities and Service Systems. Additionally, see **Consolidated Response 09-11** concerning consideration of alternatives to minimize impacts to the Sylvan Community. As such, solar farm considerations are included in the Draft EIR.

I1676-12 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community. Under CEQA, mitigation is based on the level of significance. For impacts that were significant, mitigation was proposed as appropriate, which included noise barriers, air quality measures (e.g., Tier 4 construction equipment), a lighting plan, and an operational health risk assessment. See also **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor, **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses, **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis, **Consolidated Response 09-04** concerning consideration of the Sylvan Community in the Hydrology and Water Quality analyses, **Consolidated Response 09-05** concerning consideration of the Sylvan Community in the lighting analysis, **Consolidated Response 09-06** concerning consideration of cumulative impacts to the Sylvan Community, **Consolidated Response 09-07** concerning consideration of impacts to Sylvan Community private water wells, **Consolidated Response 09-08** concerning consideration of Sylvan Community biological resources, **Consolidated Response 09-09** concerning consideration of Sylvan Community cultural resources, **Consolidated Response 09-10** concerning consideration of the Sylvan Community in the Hazardous Materials analysis, including arsenic levels/mobilization. These Consolidated Responses discuss impacts to the Sylvan Community and mitigation requirements, if any.

I1676-13 See **Response I1676-6**.

I1676-14 See **Response I1676-6**.

I1676-15 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community, **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a

sensitive receptor, **Consolidated Response 09-05** concerning consideration of the Sylvan Community in the lighting analysis, and **Consolidated Response 09-06** concerning consideration of cumulative impacts to the Sylvan Community**.** Although not specifically stated, **Draft EIR Section 5.1** (page 5.1-59) analyzes the Sylvan community for which they are considered a neighbor viewer group. Additionally, **Draft EIR Table 5.1-3: Summary of Visual Effects – BIG** (page 5.1-62), addresses the changes in view sensitivity, including from VS-9 and concludes there would be a significant change in visual quality at VS-9, as depicted in **Draft EIR Figure 5.1-22: Visual Simulation 9: BIG Operations at the Southwest Corner of Main Street at Amarylis Avenue (facing northwest)** (page 5.1-61).

I1676-16 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community, **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor, **Consolidated Response 09-05** concerning consideration of the Sylvan Community in the lighting analysis, and **Consolidated Response 09-06** concerning consideration of cumulative impacts to the Sylvan Community**.** Therefore, given that the Sylvan Community is considered a neighbor viewer, the Draft EIR analyzed the Sylvan Community with respect to VS-9 located approximately 885 feet northeast of the intersection of Gazana Street and Sylvan Avenue.

I1676-17 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community, **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor, **Consolidated Response 09-05** concerning consideration of the Sylvan Community in the lighting analysis. Furthermore, a lighting plan was prepared for the proposed BIG Specific Plan area; see **Figure 5.1-23**: **Rail Yard Lighting Plan** (page 5.1-67). As shown in **Figure 5.1-23: Rail Yard Lighting Plan** (page 5.1-67), light trespass would not extend past Main Street or into the Sylvan Community.

I1676-18 See **Draft EIR Figure 5.1-24: Light Spill Heat Map** (page 5.1-69). As shown in **Draft EIR Figure 5.1-23: Rail Yard Lighting Plan** (page 5.1-67), light associated with BIG would not pass the southern property line of BIG in compliance with County Code Chapter 83.07 (f) Allowable Light Trespass, which dictates that outdoor lighting shall not cause light trespass exceeding one-tenths foot-candles measured with a light meter oriented vertically or horizontally either at the property line of the adjacent property or measured from some other point on the property where light trespass may be reasonably determined to occur due to differences in property or improvement elevations. Light at the southern boundary of BIG has an expected brightness of 1,000-5,000 candelas. Additionally, BIG's operational lighting would adhere to the BIG Specific Plan's lighting standards and guidelines detailed in BIG Specific Plan Chapter 3: Development Regulations and Chapter 4: Design Guidelines, which are designed to meet Barstow Code standards and minimize light trespass onto adjacent properties and light-sensitive land uses. As discussed in **Draft EIR Section 5.1** (page 5.1-70), BIG's rail yard operational lighting levels would remain within BIG rail yard footprint; see **Draft EIR Figure 5.1-24: Rail Yard Lighting Plan** (page 5.1-67). Therefore, as demonstrated in the lighting plan,

and through compliance with BIG Specific Plan lighting standards, BIG would not create a new source of substantial light trespass, which would adversely affect day or nighttime views in the area as it would not spill over onto adjacent properties or light-sensitive receptors.

I1676-19 See **Consolidated Response 05** concerning feasible and enforceable mitigation**.** BIG would be required to comply with all local and county laws, ordinances, goals and policies associated with light related impacts. The Barstow Municipal Code (BMC) Title 1 – General Provisions establishes designated City officials to enforce all the provisions of the BMC, including inspection, notice, and correction of violations. The City must follow ordinances it has adopted. As discussed in **Draft EIR Section 5.1 Aesthetics** (page 5.1-5), BIG would comply with the Countywide Policy Plan, as well as Policy LU-4.7 Dark Skies, which aims to minimize light pollution and glare to promote the preservation of dark skies. BIG would also be subject to County Code Chapter 83.07, which sets forth standards prohibiting light pollution and light trespass, as well as Barstow Code Title 19: Development Standards, and Barstow Municipal Code (BMC) § 19.06.010: Outdoor Lighting.

I1676-20 As stated in **Responses I1676-6 and I1676-13** through **I1676-15** above, the Sylvan Community was considered under **Draft EIR Impact 5.1-3** (pages 5.1-30 to 5.1-63).

I1676-21 See **Response I1676-20**. See **Draft EIR Section 5.1 Aesthetics** page 5.1-28 concerning the preservation of residential visual character under the proposed General Plan. As discussed, future development under the proposed General Plan would be required to comply with existing City regulations that maintain the City's character, such as the City's Development Standards and Design Guidelines found in Barstow Code Chapter 19.08 – Design Guidelines, which encourages the preservation of visual character.

I1676-22 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community, **Consolidated Response 09-11** concerning consideration of alternatives to minimize impacts to the Sylvan Community, and **Response I1676-11**.

I1676-23 See **Consolidated Response 03** concerning recirculation of the Draft EIR and **Consolidated Response 09-11** concerning consideration of alternatives to minimize impacts to the Sylvan Community.

I1676-24 See **Figure 3-36: Rail Yard Cross-Section** (page 3-88) in **Draft EIR Section 3.0 Project Description**. As shown in the figure, high mast lights would be between 80 and 120 feet tall.

I1676-25 As discussed in **Draft EIR Section 5.1: Aesthetics** (page 5.1-68), lighting within the BIG Specific Plan area must be fully shielded and placed such that it avoids light trespass onto adjacent properties. Additionally, glare impacts would be reduced in these locations by utilizing lighting with high-efficiency technologies, dark-sky cutoffs, strategic orientation to avoid light trespass into adjacent properties and open space areas, and appropriate shielding or recesses to avoid glare and reflections. All lighting would comply with the BIG Specific Plan Chapter 3 Development Regulations and Chapter 4: Design Guidelines, which implement guidelines for placement and design of lighting (page 5.1-72) As discussed on Draft EIR page 5.1-68, in

compliance with BIG Specific Plan Chapter 4, exterior lighting should be unobtrusive and not cause glare or spillover into neighboring properties. Lighting fixtures should be fully shielded to direct illumination downward to avoid light trespass.

I1676-26 See **Response I1676-18** concerning nighttime brightness and potential light trespass.

I1676-27 See **Consolidated Response 05** concerning feasible and enforceable mitigation. Vegetative screening is infeasible due to the arid desert environment and thus, vegetative screening would require non-native plants with excessive water demands. Berms are infeasible because the limited space between Main Street and the slope would be minimal. Furthermore, as shown on the visual simulations, the key elements of the BIG facility that would be visible are high-mast lighting and portions of rail-mounted gantry cranes. A berm or visual screening would not be able to obscure high-mast lighting of up to 120 feet, thus, would not be feasible mitigation.

I1676-28 See **Consolidated Response 05** concerning feasible and enforceable mitigation and **Response I1676-27.**

I1676-29 See **Draft EIR Appendix 5.1 BIG-2 Solar Farm Glare Study** for analysis relating to potential impacts related to solar farm glare.

I1676-30 Anti-reflective coating and alternative panel orientations would minimize impacts concerning light and glare. However, as analyzed in **Draft EIR Impact 5.1-3** (pages 5.1-30 through 5.1-63), BIG impacts concerning light and glare were determined to be less than significant, thus, no mitigation was required.

I1676-31 As discussed in **Draft EIR Section 5.1: Aesthetics (page 5.1-32)**, substantial construction activity would be required for BIG over approximately 34 months to develop a rail yard with an intermodal facility and block swap yard, a transload warehouse center, and off-site rail improvements (east and west leads) and non-rail improvements (i.e., solar farm, stormwater drainage, utility, and circulation and roadway). Consequently, visual disturbances associated with BIG construction would occur for the duration of construction, and be more noticeable to travelers, including along Main Street, the nearest location to the Sylvan Community. As discussed in **Draft EIR Impact 5.1-3** (pages 5.1-30 through 5.1-62), BIG would implement **MM BIG AES-1**. This mitigation measure requires that contractors develop a Construction Lighting and Screening Plan to ensure visual screening would be erected during construction, as appropriate to minimize visual intrusions (and ensure safety and security).

I1676-32 As discussed in **Draft EIR Section 3.0: Project Description** (page 3-86), BIG construction would occur over approximately 34 months requiring nighttime construction activities; however, construction hours and the number of workers present at any time would vary depending on the activities being performed. BIG construction activities would create a new source of substantial light and glare that would adversely affect nighttime views in the area as discussed in **Draft EIR Section 5.1: Aesthetics** (page 5.1-64)**.** To reduce construction-related light exposure impacts, **MM BIG AES-1** requires the preparation and implementation of a Construction Lighting and Screening Plan (CLSP) that requires visual screening (i.e., temporary

fencing). Additionally, the CLSP is required to identify and implement lighting treatments for all construction work areas (i.e., maximum brightness values not to be exceeded by artificial bulbs, screening around BIG's footprint to limit light and glare, and use of non-reflective glass. The CLSP would also identify methods used to ensure construction lighting is directional (aimed toward work areas and away from nearby sensitive receptors) and limited to sufficient wattage for safety and security. Construction lighting would be temporary and cease upon BIG completion. These mitigation measures would help to minimize impacts of lighting during nighttime hours.

I1676-33 As BIG would operate 24 hours a day, 7 days a week, 365 days a year, it would introduce a substantial amount of illumination/glow to an area with nearby sensitive receptors and a minimally illuminated environment. BIG would introduce new light pollution and glow impacts during nighttime hours. To address this, as mentioned on **Draft EIR Section 5.1** page 5.1-68, BIG's operational lighting would adhere to the BIG Specific Plan's lighting standards and guidelines detailed in BIG Specific Plan Chapter 3: Development Regulations and Chapter 4: Design Guidelines, which are designed to meet Barstow Code standards and minimize light trespass onto adjacent properties and light-sensitive land uses. BIG Specific Plan Chapter 3: Development Regulations states that lighting within the BIG Specific Plan area shall be provided to enhance the safety and security of BIG operations. Also, lighting must be fully shielded and placed such that it avoids light trespass onto adjacent properties located outside of BIG Specific Plan area.

I1676-34 All BIG lighting would be required to comply with County Code Chapter 83.07: Light Trespass, which sets forth standards that prohibit light pollution and light trespass. As discussed on **Draft EIR Section 5.1** page 5.1-6, in compliance with subsection c, automated control systems, such as motion sensors and timers, shall be used to meet curfew requirements set forth in subdivision (d). Photocells or photo controls shall be used to extinguish all outdoor lighting automatically when sufficient daylight is available.

I1676-35 See **I1676-3**, above, **Consolidated Response 09-05** concerning consideration of the Sylvan Community in the lighting analysis. As mentioned in **Consolidated Response 09-01,** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor, because the Sylvan Community is located approximately 130 feet southeast of the BIG Specific Plan area/south of Main Street, the Sylvan Community is included within many of the identified study areas, including aesthetics. As a result, any potential impact to the community has been adequately analyzed and subsequently mitigated (if necessary) in the Draft EIR.

I1676-36 See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER I1677

I1677

January 2, 2026 5.3 Air Quality dEIR Response

Dear City of Barstow, Planning Department, BNSF Railway:

My name is Sherry Baily. I am submitting this comment as a resident of **Sylvan Avenue Community**, one of the neighborhoods located closest to the proposed Barstow International Gateway (BIG) project. My home, land, and outdoor living space will be directly exposed to the air quality, noise, vibration, lighting, and visual impacts of this project. The Draft Environmental Impact Report (DEIR) fails to adequately analyze or mitigate these impacts and, therefore, does not comply with the California Environmental Quality Act (CEQA). I1677-1

Below is my formal comment regarding **Air Quality**, including a **Sylvan Avenue–specific analysis**, a **CEQA legal argument**, and **questions for both the City and BNSF**. This version includes the full analysis of BNSF's claim that the yard will use **Tier 4 locomotives** and that it will **not be a maintenance yard**.

1. Sylvan Avenue–Specific Air Quality Impacts

The DEIR acknowledges that both the General Plan and the BIG project will result in **significant and unavoidable air quality impacts**, but it does not analyze how these impacts fall disproportionately on the Sylvan Avenue Community residents — the closest residential community to the project footprint. I1677-2

A. Exposure to Diesel Particulate Matter (DPM)

BIG operations will include locomotives, cargo-handling equipment, trucks, construction machinery, and a huge increase in traffic (employees of rail and warehouses, as well as trucking transportation) — all of which emit **diesel particulate matter**, a known **Toxic Air Contaminant** linked to cancer, asthma, and cardiovascular disease. The Sylvan Avenue Community lies directly windward of the project area, meaning residents will experience **higher localized concentrations** than the general population. I1677-3

B. Increased PM10 and PM2.5 in a Nonattainment Basin

The Mojave Desert Air Basin is already in **nonattainment** for PM10 and PM2.5. BIG will add: I1677-4

Construction dust

Fine particulate matter

Diesel combustion emissions

These pollutants easily infiltrate homes — especially modular homes like mine — and settle on outdoor living areas. I1677-5

C. Significant and Unavoidable Emissions I1677-6

The DEIR concludes that both the construction and operation of BIG will:

- Exceed MDAQMD thresholds
- Conflict with air quality plans
- Worsen nonattainment
- Increase health risks

I1677-6 cont'd

Even with mitigation, the DEIR states:

- **Air quality impacts remain significant and unavoidable.**

I1677-7

This means the City is knowingly approving a project that will permanently worsen air quality for the Sylvan Avenue Community residents.

D. Cumulative Health Risk

The DEIR admits that BIG will contribute to **elevated cancer risk** from Toxic Air Contaminants. The Sylvan Avenue Community is already exposed to emissions from:

- The existing BNSF rail line
- Highway traffic
- Industrial uses

I1677-8

BIG adds a major new source of diesel emissions, yet the DEIR does not analyze cumulative exposure for our neighborhood.

E. No Analysis of Outdoor Exposure

The Sylvan Avenue Community residents are **residents with land and outside space**. We use our yards, patios, and outdoor areas daily.

The DEIR does **not** analyze:

- Outdoor exposure to diesel exhaust
- Dust deposition on residential land
- Air quality impacts on outdoor living spaces

I1677-9

This is a major omission under CEQA. I1677-10

2. Considerations of BNSF's Claim: "Tier 4 Engines" and "Not a Maintenance Yard" I1677-11

BNSF has stated that the BIG intermodal yard will use Tier 4 locomotives and that it will not be a maintenance yard. While this sounds reassuring, it does not change the DEIR's conclusions, nor does it resolve CEQA deficiencies. I1677-11 cont'd

A. Tier 4 locomotives still emit harmful pollutants

Tier 4 engines reduce emissions, but they still emit:

NOx

PM2.5 I1677-12

Diesel particulate matter

Hazardous air pollutants

In a region already in nonattainment, **any new diesel emissions worsen public health conditions**.

B. Tier 4 locomotives are extremely rare in real-world freight operations

Nationally, Tier 4 locomotives make up **less than 5%** of the freight fleet. If BNSF is promising "Tier 4 only," this is far outside normal industry practice and requires: I1677-13

Written commitments

Enforceable conditions

Modeling based on Tier 4 emissions

None of this appears in the DEIR. I1677-14

C. CEQA requires enforceability

Unless the Tier 4 commitment is: I1677-15

Written into the project description

Included as a mitigation measure

Legally enforceable…it has **no legal weight** under CEQA. I1677-16

D. "Not a maintenance yard" does not reduce emissions

Maintenance is not the primary source of emissions in a rail yard. The major sources are: I1677-17

Idling

Switching

Coupling

Decoupling

Cargo- handling equipment

Truck movements

I1677-17 cont'd

These activities occur in **every** intermodal yard, regardless of maintenance. I1677-18

E. Even with Tier 4, the DEIR still finds significant and unavoidable impacts

The DEIR already assumes cleaner equipment and still concludes: I1677-19

Construction and operational emissions exceed thresholds. Air quality impacts remain significant and unavoidable.

Tier 4 does **not** change this. I1677-20

F. CEQA requires analysis of actual operations, not marketing language

Calling the facility "Tier 4 only" or "not a maintenance yard" does not change:

The number of locomotives

The hours of operation I1677-21

The idling time

The switching activity

The emissions profile

The DEIR must analyze **real emissions**, not unverified assurances. I1677-22

3. CEQA Legal Argument: Where the DEIR Fails

I. Failure to Analyze Impacts on the Nearest Sensitive Receptors I1677-23

The Sylvan Avenue Community residents are not identified as sensitive receptors, violating CEQA Guidelines §§ 15126.2 and 15151, "good faith effort at full disclosure of environmental impacts".

II. No Health Risk Assessment for the Sylvan Avenue Community

The DEIR acknowledges increased cancer risk but does not conduct a Health Risk Assessment for the neighboring communities. I1677-24

III. No Analysis of Outdoor Exposure I1677-25

CEQA requires evaluation of impacts on the environment people actually use. The DEIR ignores impacts on outdoor living spaces. I1677-25 cont'd

IV. Failure to Analyze Cumulative Impacts

The DEIR does not evaluate cumulative exposure from:

- Existing rail operations
- Highway emissions
- BIG construction and operations

I1677-26

This violates CEQA Guidelines § 15130. I1677-27

V. Failure to Consider Feasible Mitigation

The DEIR does not evaluate feasible mitigation such as:

- Air filtration programs
- Vegetative buffers
- Setbacks
- Zero- emission equipment requirements

I1677-28

This violates CEQA Guidelines § 15126.4. I1677-29

VI. Failure to Consider Alternatives That Reduce Air Quality Impacts

The DEIR does not evaluate alternatives that could reduce emissions for the Sylvan Avenue Community. I1677-30

This violates CEQA Guidelines § 15126.6, **our lives and health are not insignificant.** I1677-31

4. Questions for the City of Barstow

Sensitive Receptors I1677-32

1. Why does the DEIR not identify Sylvan Avenue as a sensitive receptor group?
2. What criteria were used to exclude Sylvan Avenue from receptor analysis?

Health Risk I1677-33

1. Why was no Health Risk Assessment conducted for Sylvan Avenue?
2. Why isn't there concern for elevated cancer risk for residents living adjacent to the project?

Outdoor Exposure

1. How will the City evaluate air quality impacts on residents with land and outside space?
2. What measures will protect outdoor living areas from diesel exhaust and dust?

I1677-34

Mitigation

1. Why were no home air filtration programs proposed for nearby residents?
2. Why were no vegetative buffers or setbacks included?

I1677-35

Cumulative Impacts

1. Why does the DEIR not analyze cumulative emissions from existing rail operations plus BIG?
2. Will the City prepare a Supplemental EIR to correct this?

I1677-36

5. Questions for BNSF Railway

Tier 4 Locomotives

1. Will BNSF provide a binding, enforceable commitment to use Tier 4 locomotives exclusively?
2. What percentage of BNSF's current fleet is Tier 4?
3. How will BNSF ensure Tier 4 locomotives are always available for BIG operations?

I1677-37

Idling

1. What is the expected locomotive idling time near Sylvan Avenue?
2. Will BNSF commit to anti- idling protocols?

I1677-38

Cargo- Handling Equipment

1. What percentage of cargo- handling equipment will be electric?
2. What is the timeline for full electrification?

I1677-39

Construction Emissions

1. How will BNSF prevent dust from entering the Sylvan Avenue Community properties?
2. What construction equipment will use renewable diesel or zero- emission technology?

I1677-40

Community Protections

1. Will BNSF fund air filtration systems for nearby homes?

I1677-41

2. Will BNSF commit to continuous air monitoring along Sylvan Avenue? I1677-41 cont'd

The DEIR fails to comply with CEQA because it does not adequately analyze or mitigate air quality impacts on the Sylvan Avenue Community— the nearest residential neighborhood. The City must prepare a **Supplemental EIR** that includes:

A Health Risk Assessment for Sylvan Avenue

Outdoor exposure analysis I1677-42

Cumulative impact analysis

Measureable AND Enforceable commitments from BNSF

Feasible mitigation and alternatives

Until these deficiencies are corrected, the DEIR should not be lawfully certified.

I respectfully request that the City of Barstow, as the over-seeing agency, respond to my concerns as well as questions, in writing and commit to a community-centered approach as this project consideration moves forward. I1677-43

Sincerely,

Sherry Baily

Sylvan Ave Community

RESPONSES TO COMMENT LETTER I1677, SHERRY BAILY

I1677-1 See **Consolidated Response 04** concerning general non-CEQA issues.

I1677-2 See **Response S6-2, Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community, **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor, **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis, and **Consolidated Response 09-06** concerning consideration of cumulative impacts to the Sylvan Community. See **Response S6-2** concerning the analysis of localized impacts to nearby sensitive receptors including the Sylvan community in the Draft EIR (pages 5.3-124 through 5.3-135). Sensitive receptors are identified on **Draft EIR Table 5.3-14: Sensitive Receptors – BIG** (page 5.3-69) and **Figure 5.3-4: Sensitive Receptor Locations** (page 5.3-151) and include the Sylvan Community. Ambient air concentration and health risk contours identifying BIG can be found on **Draft EIR Figures 5.3-5: Construction Mitigated 24-Hour PM10 Pollutant Concentration Isopleth** through **5.3-15: Combined Construction and Operational Health Risk Assessment – West Leads (Unmitigated)** (pages 5.3-127, 5.3-140, 5.3-141, 5.3-145, 5.3-146, 5.3-147, 5.3-148, 5.3-149, 5.3-150, 5.3-151 and 5.3-152). These contours include the Sylvan community. Also, the Draft EIR assesses localized health risk impacts on sensitive receptors on pages 5.3-137 through 5.3-161 and includes contours; see **Draft EIR Figure 5.3-12: Operations Health Risk Assessment – BIG and East Leads (Mitigated)** (page 5.3-149) and **Draft Figure 5.3-19: Combined Construction and Operational Health Risk Assessment – West Leads (Mitigated)** (page 5.3-156). Specifically, **Draft Figure 5.3-12: Operations Health Risk Assessment – BIG and East Leads (Mitigated)** (page 5.3-156) shows that the Sylvan Community would be within the 10 in one million health risk contour during BIG operations. The Draft EIR concludes that BIG's health risk impacts would be significant and unavoidable due to the exceedance of the 10 in one million threshold despite implementation of mitigation measures.

The Draft EIR explains that the HRA intentionally employs health-protective, worst-case assumptions consistent with OEHHA's Air Toxics Hot Spots Program Risk Assessment Guidelines (see Draft EIR pages 5.3-137 to 5.3-138). These conservative assumptions are designed to overestimate potential risk rather than underestimate it, ensuring that potential health effects are not understated. For example, the HRA assumes that residents are continuously exposed for 30 years, workers for 25 years, and school children for 9 years, at the same fixed outdoor location (Draft EIR pages 5.3-43 to 5.3-44 and page 5.3-46), without accounting for time spent indoors or away from the area. These assumptions greatly exceed typical real world exposure patterns. The cancer risk calculations conservatively assume that all residential exposure begins during the third trimester in utero, a period OEHHA identifies as having higher breathing rates and increased sensitivity (Draft EIR pages 5.3-43 to 5.3-44). This assumption applies universally, even though it would realistically affect only a small fraction of the exposed population. Additionally, the HRA uses 95th percentile breathing rates for infants and 80th percentile rates for all other age groups (Draft EIR page 5.3-46), intentionally overstating inhaled dose relative to average individuals.

The analysis assumes all PM10 exhaust emissions are diesel particulate matter (DPM), even though DPM is only a subset of PM10 (Draft EIR page 5.3-57). Because more than 90 percent of DPM is actually PM2.5, using PM10 as a surrogate intentionally overstates cancer and non-cancer risk. Furthermore, the analysis assumes receptors remain outdoors 100 percent of the time, with no reduction in exposure from indoor environments, where pollutant concentrations are substantially lower.

Regarding the health risk threshold, the Draft EIR explains that the incremental cancer risk significance threshold of 10-in-one-million (used by MDAQMD and other California air districts) is itself a highly precautionary planning benchmark, not a predictor of actual disease occurrence (Draft EIR page 5.3-138). Specifically, this threshold represents a statistical probability assuming one million people are exposed continuously, at the same concentration, for decades under the conservative assumptions described above. The Draft EIR notes that lifetime background cancer risk from all causes is hundreds of thousands per million, whereas the CEQA significance threshold is only 10 per million. The project threshold therefore represents a very small incremental addition relative to existing cancer risk from all sources. There is no known "safe" threshold for carcinogens such as DPM; accordingly, agencies adopt policy-based significance thresholds that err on the side of caution. The 10-in-one-million level functions as a screening and disclosure threshold, not as a level at which adverse health effects are expected to occur. Under California's Air Toxics "Hot Spots" program, mandatory risk reduction plans are not triggered until much higher risk levels (e.g., 100 in one million). Thus, the CEQA significance threshold is deliberately set an order of magnitude lower than thresholds associated with mandatory health risk management actions. When combined with the HRA's conservative exposure duration, breathing rate, receptor location, and DPM assumptions, the 10-in-one-million threshold represents a compounded margin of safety, not a realistic estimate of actual cancer incidence.

Draft EIR Table 5.3-40: Unmitigated Net Operational DPM Emissions Along Corridor (Tons per Year) (page 5.3-161) shows that DPM emissions would decrease west of BIG (i.e., including the corridor segment near Silver Lakes/Helendale). BIG's DPM emission reduction occurs from using dedicated Tier 4 locomotives between the Ports and BIG and from modifying the fuel blend used within the Ports' existing fueling site to use up to ten percent renewable diesel. Therefore, BIG would improve DPM emissions in the Corridor and would result in a beneficial impact. Thus, there is no potential cancer risk, hazard index, or cancer burden impacts in the Corridor west of BIG. A less than significant impact would occur for all localized corridor impacts, including the west lead tracks near the Silver Lakes/Helendale Community; see **Draft EIR Table 5.3-40: Unmitigated Net Operational DPM Emissions Along Corridor (Tons per Year)** (page 5.3-161). Mitigation Measures (MM) **MM BIG AQ-1** through **MM BIG AQ-14** are included to mitigate impacts to sensitive receptors. **MM BIG AQ-1** through **MM BIG AQ-6** would reduce construction fugitive dust and exhaust emissions, while **MM BIG AQ-7 requires** sweeping paved areas to reduce operational dust; **MM BIG AQ-8** requires renewable diesel for RTG cranes; and **MM BIG AQ-9** through **MM BIG 14** requires various measures to reduce BIG transload warehouse-related operational exhaust emissions.

Additionally, as noted on Draft EIR page 5.13-113, BIG would use zero-emission electric hostlers for container movements between the intermodal facility and the transload warehouses.

The Draft EIR found BIG would result in a potentially significant ambient air concentration impacts for construction PM10 emissions only; see **Draft EIR Table 5.3-29: Maximum Off-Site Construction Pollutant Concentrations (Mitigated)** (page 5.3-126) and **Table 5.3-31: Maximum Off-Site Concentration from Operations (Mitigated)** (page 5.3-130). However, these impacts would be less than significant at the Silver Lakes/Helendale Community; see **Draft EIR Figure 5.3-12: Operations Health Risk Assessment – West Leads (Mitigated)** (page 5.3-149) and **Figure 5.3-19: Combined Construction and Operational Health Risk Assessment – West Leads (Mitigated)** (page 5.3-156).

CEQA requires evaluation of whether a project may cause significant physical impacts on the environment, including air quality impacts, and whether those impacts would be significant based on adopted thresholds (State CEQA Guidelines §§ 15064, 15126.2). CEQA does not require an EIR to analyze whether impacts are "disproportionate" among different population groups unless such analysis is necessary to determine whether a physical environmental impact would be significant. California courts have consistently held that CEQA is concerned with the existence and severity of physical environmental impacts, not with the distribution of social or economic effects among particular neighborhoods or demographic groups.[4] Accordingly, CEQA does not require a lead agency to perform a separate disproportionate impact analysis for the closest residential neighborhood.

Nonetheless, as noted above, the Draft EIR acknowledges that the localized air quality impacts are limited to construction PM10 at a small location along the fence line within the Main Street and Mockingbird Street intersection right-of-way and would not impact sensitive receptors; see **Draft EIR Figure 5.3-5: Construction Mitigated 24-Hour PM10 Pollutant Concentration Isopleth** (page 5.3-127). The Draft EIR conservatively determined that this would be a significant and unavoidable impact with mitigation (mitigated operational localized air quality impacts would be less than significant; see **Draft EIR Table 5.3-31: Maximum Off-Site Concentration from Operations (Mitigated)** (page 5.3-130). CEQA expressly allows approval of projects with significant and unavoidable impacts, provided those impacts are fully disclosed and supported by substantial evidence, and a Statement of Overriding Considerations is adopted (State CEQA Guidelines §§ 15093, 15126.2). See **Consolidated Response 02** concerning significant and unavoidable impacts and the Statement of Overriding Considerations. The fact that Sylvan residents are among the closest receptors does not constitute a separate CEQA impact requiring additional analysis; rather, it reflects the unavoidable nature of proximity to largescale infrastructure projects. As noted above, Draft EIR **Figure 5.3-13: Operations Health Risk Assessment – BIG and East Leads (Mitigated)** (page 5.3-150) shows that the Sylvan Community would be within the 10-in-one-million health risk contour during operations. The Draft EIR concludes that health risk impacts would

[4] *Preserve Poway v. City of Poway (*2016) 245 Cal.App.4th 560, 581.

be significant and unavoidable due to the exceedance of the 10-in-one-million threshold despite the implementation of mitigation measures. Additionally, as noted above, the HRA applies intentionally conservative assumptions, including continuous 30-year outdoor exposure beginning in utero, high-end breathing rates, treatment of all PM10 as diesel particulate matter, evaluation of the maximally exposed individual, and a 70-year cancer burden duration, consistent with OEHHA guidance and the MDAQMD 10-in-one-million significance threshold, resulting in health-protective upper-bound risk estimates rather than realistic exposure predictions (Draft EIR pages 5.3-43 to 5.3-47). The Draft EIR appropriately discloses this condition. However, as noted above, the mitigated construction impact would be within the Main Street and Mockingbird Street intersection right-of-way and would not occur at a sensitive receptor area of frequent human use; see **Draft EIR Figure 5.3-5: Construction Mitigated 24-Hour PM10 Pollutant Concentration Isopleth** (page 5.3-127).

I1677-3 See **Response I1677-2**. The Draft EIR acknowledges that diesel particulate matter (DPM) is a toxic air contaminant and evaluates DPM emissions and associated health risks from construction and operational sources, including locomotives, trucks, cargo handling equipment, and construction equipment. The Draft EIR's Health Risk Assessment (HRA) evaluates exposure at the nearest and most impacted residential receptors, which include residences in the Sylvan Avenue area. CEQA requires analysis of physical environmental impacts, including human health risks, using reasonably foreseeable exposure scenarios and accepted scientific methods. CEQA does not require analysis of individual household level exposure variations (e.g., windward versus leeward properties) once the EIR has evaluated impacts at the maximum exposure locations (State CEQA Guidelines §§ 15064, 15126.2).[5] BIG's ambient air concentration and health risk contours can be found on **Draft EIR Figures 5.3-5: Construction Mitigated 24-Hour PM10 Pollutant Concentration Isopleth through 5.3-15: Combined Construction and Operational Health Risk Assessment – West Leads (Unmitigated)** (pages 5.3-127, 5.3-140, 5.3-141, 5.3-145, 5.3-146, 5.3-147, 5.3-148, 5.3-149, 5.3-150, 5.3-151 and 5.3-152). These contours include the Sylvan community. Also, the Draft EIR assesses localized health risk impacts on sensitive receptors on pages 5.3-137 through 5.3-161 and includes contours (see **Draft EIR Figure 5.3-12: Operations Health Risk Assessment – West Leads (Mitigated)** (page 5.3-149) and **Draft EIR Figure 5.3-19: Combined Construction and Operational Health Risk Assessment – West Leads (Mitigated)** (page 5.3-156).

The Draft EIR's approach involved modeling impacts at the closest residential receptors under conservative assumptions, which necessarily captures the highest localized concentrations that could occur due to wind direction, proximity, and activity intensity. This is a standard and the conservative CEQA methodology recommended by the California Office of Environmental Health Hazard Assessment (OEHHA). The OEHHA *Air Toxics Hot Spots Program Guidance Manual for the Preparation of Health Risk Assessments* (February 2015) directs that health risk assessments evaluate impacts at the maximally exposed individual, including the closest sensitive receptors and worst case wind conditions, and apply conservative assumptions to ensure health protective results (pages 1-5; 9-1 – 9-3). The fact that Sylvan Avenue residences

[5] Laurel Heights Improvement Assn. v. Regents of the University of California (1988) 47 Cal.3d 376, 392.

may be among those closest to BIG is reflected in the receptor selection and does not require a separate or enhanced analysis.

I1677-4 The Draft EIR identifies that the Mojave Desert Air Basin is in nonattainment for PM_{10} and $PM_{2.5}$ and evaluates construction and operational emissions accordingly. The analysis quantifies emissions from construction dust (fugitive PM_{10} and $PM_{2.5}$), diesel combustion sources, and operational mobile sources. These emissions are compared against Mojave Desert Air Quality Management District (MDAQMD) significance thresholds and regional air quality plans. CEQA requires disclosure of whether a project would contribute to nonattainment or conflict with an applicable air quality plan; it does not require proof that emissions infiltrate individual homes or affect particular housing types (State CEQA Guidelines §§ 15064, 15125, 15126.2). The Draft EIR further identifies and incorporates mitigation measures to minimize construction dust and operational emissions. Even with these measures, the Draft EIR transparently concludes that some impacts remain significant and unavoidable, consistent with CEQA disclosure requirements. MDAQMD has commented on the Draft EIR and agreed that all feasible mitigation is included in the Draft EIR; see **Responses to Comment Letter L3.**

I1677-5 See **Response I1677-4** and **Consolidated Response 04** concerning general non-CEQA issues.

I1677-6 The Draft EIR acknowledges that BIG's construction and operational emissions would exceed MDAQMD significance thresholds and would therefore be inconsistent with applicable air quality plans. Under CEQA, exceedance of these thresholds indicates a significant air quality impact that must be fully disclosed. Additionally, while exceedance of MDAQMD thresholds requires the impact to be identified as significant in the Draft EIR, these thresholds do not quantitatively determine whether BIG would worsen regional nonattainment status or regional public health conditions. See also **Responses I1677-2, I1677-3 I1677-4**, above, and **Consolidated Response 17** concerning health impact analysis.

I1677-7 The Draft EIR's conclusion of significant and unavoidable air quality impacts despite the implementation of all feasible mitigation measures fulfills CEQA's requirement to disclose BIG's environmental impacts. The Draft EIR evaluates BIG's localized air quality and health risk impacts using conservative assumptions and the nearest residential receptors, which include residential areas near Sylvan Avenue. See **Responses I1677-2, I1677-3 and I1677-4,** above, and **Consolidated Response 17** concerning health impact analysis. The Draft EIR acknowledges that nearby residential uses would experience adverse air quality effects and clearly discloses that these impacts cannot be reduced to a less than- -significant level through feasible mitigation due to BIG's scale and nature.

CEQA does not prohibit approval of a project that worsens air quality in a nonattainment basin. Rather, CEQA is a disclosure statute, not a substantive environmental protection mandate.[6] CEQA expressly allows approval of projects with significant and unavoidable impacts, provided those impacts are fully disclosed and the lead agency adopts a Statement

[6] *San Franciscans for Reasonable Growth v. City and County of San Francisco* (1989) 209 Cal.App.3d 1502, 1514. (Ct. App. 1989).

of Overriding Considerations explaining why the project's benefits outweigh the unavoidable environmental effects (State CEQA Guidelines §§ 15093, 15126.2(c)). This conclusion does not indicate that the City is knowingly approving BIG despite its air quality impacts but rather reflects CEQA'S procedural requirements. CEQA requires adoption of a Statement of Overriding Considerations if the City considers approving BIG with significant and unavoidable impacts. See also **Consolidated Response 17** concerning health impact analysis.

I1677-8 See **Response I1677-7.** Also see **Consolidated Response 17**, which explains the HIA Report's finding that "Barstow residents and communities along the Corridor will not experience any meaningful or discernible individual or cumulative health impacts or health endpoint increases as a result of BIG construction or operations." The Draft EIR includes a cumulative air quality and health risk analysis that evaluates BIG's contribution to existing and reasonably foreseeable sources of emissions in the area, including rail, roadway, and industrial sources, included the existing BNSF railway. CEQA requires evaluation of whether a project's incremental contribution to cumulative impacts is cumulatively considerable (State CEQA Guidelines § 15064(h)). The Draft EIR's cumulative analysis identifies existing "related" projects, evaluates BIG's incremental contribution, and discloses that cumulative health risks would be significant and whether there is feasible mitigation. This satisfies CEQA's cumulative impact requirements.

Draft EIR Section 5.3: Air Quality states that BIG would result in significant and unavoidable impacts with regard to air quality planning, criteria pollutant emissions, and exposure of sensitive populations.

Localized Exposure for Sylvan Community: See **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis.

Health Risk Assessment: See **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis and **Draft EIR Appendix 5.3 BIG-1: Air Quality Technical Report** (Section 6.9) concerning health risk.

Outdoor Exposure: See **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis.

Cumulative Exposure: See **Draft EIR Section 6.0: Cumulative Impacts** concerning BIG's cumulative impacts. See again **Consolidated Response 17** concerning health impact analysis.

Refer also to Response **O21-81**.

I1677-9 The commenter raises concerns that the Draft EIR does not analyze outdoor exposure to diesel exhaust, dust deposition on residential land, and air quality impacts on outdoor living spaces. See **Response I1677-2** concerning the Draft EIR analysis of air quality impacts and health risk on sensitive receptors surrounding the BIG footprint (pages 5.3-137 to 5.3-161), including Sylvan communities. Additionally, it is noted that all the pollutant concentrations and health risks conservatively assume 100 percent outdoor exposure consistent with the California Office of Environmental Health Hazard Assessment (OEHHA) Air Toxics Hot Spots

Program Risk Assessment Guidelines (2015). The Draft EIR's air quality and health risk analyses are based on ambient outdoor concentrations, which are the regulatory basis for air quality standards and toxic risk thresholds. These ambient concentrations are inherently protective of outdoor exposure conditions. The Draft EIR does not take credit for reductions for indoor exposure. Additionally, CEQA does not require a separate analysis of outdoor versus indoor exposure or dust deposition on individual residential parcels. CEQA requires evaluation of changes to ambient air quality and associated health risks at representative sensitive receptors (State CEQA Guidelines §§ 15064, 15126.2). Additionally, construction dust impacts are addressed through required dust control mitigation measures that limit off-site migration and deposition (see Draft EIR pages 5.3-84 through 5.3-88 and **MM BIG AQ-1** on page 5.3-104).

I1677-10 See **Response I1677-9**.

I1677-11 The Draft EIR does not claim that Tier 4 locomotives eliminate emissions or fully protect against health effects. Rather, the Draft EIR expressly acknowledges that even with cleaner equipment, diesel fueled sources emit nitrogen oxides (NO_X), particulate matter ($PM_{2.5}$), and diesel particulate matter (DPM), and that operational air quality impacts would remain significant and unavoidable.

CEQA requires disclosure of whether a project would result in significant environmental effects, not that a project reduces emissions to zero (State CEQA Guidelines §§ 15064, 15126.2). The Draft EIR satisfies this requirement.

Although Tier 4 locomotives do not eliminate emissions entirely, they provide substantial reductions in air pollutant emissions compared to older freight locomotives and they meet the most stringent U.S. EPA emissions standards for freight locomotives. Compared to Tier 2 locomotives (which represent much of todays in service fleet), Tier 4 locomotives are estimated by the U.S. EPA to achieve approximately 80 percent reduction in nitrogen oxides (NO_X) and an approximately 90 percent reduction in diesel particulate matter (PM and DPM). These reductions are achieved through the use of advanced engine controls and exhaust after-treatment technologies and apply to both line-haul and switcher locomotives manufactured or remanufactured to Tier 4 standards starting in 2015.[7]

I1677-12 See Response I1677-11. Whether the region is in attainment or nonattainment, CEQA requires state and local agencies to disclose and evaluate a project's potential environmental impacts and to apply all feasible mitigation measures to reduce those emissions. As disclosed in the Draft EIR, Tier 4 locomotives emit NO_X, PM2.5, diesel particulate matter (DPM), and other air pollutants. CEQA requires evaluation of a project's emissions against established regulatory significance thresholds. The Draft EIR discloses that BIG would exceed thresholds for mass emissions of criteria pollutants. As to public health effect, see **Response I1677-2** and **Consolidated Response 17** concerning health impact analysis.

7 U.S. EPA, *Information about EPA Strategies to Reduce Air Pollution from Locomotives* (EPA-420-F-22-030), November 2022. https://nepis.epa.gov/Exe/ZyPDF.cgi/P101608H.PDF?Dockey=P101608H.PDF

See **Response I1677-7**--if a City considers approving a project with significant and unavoidable impacts, CEQA requires the adoption of a Statement of Overriding Considerations to document the basis for that decision in a transparent and public manner. See **Consolidated Response 02** concerning significant and unavoidable impacts and the Statement of Overriding Considerations.

I1677-13 CEQA does not require a lead agency to analyze national fleet composition or industry-wide adoption rates unless such information is necessary to understand project impacts. The Draft EIR's air quality analysis is based on assumed emissions characteristics, not on whether those characteristics reflect current industry averages.

Courts have held that an EIR's adequacy is judged on whether it reasonably discloses environmental consequences, not whether it predicts market behavior or conforms to typical industry practice.[8] Whether Tier 4 locomotives represent a small or large percentage of the national fleet does not alter the impact conclusions and is not required for CEQA compliance. Tier 4 locomotives are a binding and enforceable part of BIG (see **Consolidated Response 12-03** concerning enforceability of the Project components and mitigation measures for the Project) and the air quality modeling is properly based on Tier locomotive emissions.

I1677-14 See **Response S17-13**.

I1677-15 See **Response S17-13. Tier 4 locomotives are a binding and enforceable part of BIG**; see **Consolidated Response 12-03** concerning enforceability of the Project components and mitigation measures for the Project.

I1677-16 Tier 4 locomotives are a binding and enforceable part of BIG (see **Consolidated Response 12-03** concerning enforceability of Project components and mitigation measures for the Project) and they are discussed in **Draft EIR Section 3.0: Project Description** (pages 3-47 through 3-51).

I1677-17 The Draft EIR does not rely on the "not a maintenance yard" description to minimize impacts. CEQA requires evaluation of construction and operational emissions based on assumptions supported by substantial evidence, which the Draft EIR provides (State CEQA Guidelines §§ 15064 and 15125).

The emissions analysis is driven by the operational sources of BIG construction and operation, including the following: locomotive idling and switching, coupling and decoupling movements, cargo handling equipment, truck trips, et al. These sources are identified in the **Draft EIR** see pages 5.3-36 through 5.3-39, including **Draft EIR Table 5.3-8: BIG Operational Assumptions Summary** (page 5.3-38 and 5.3-39) and **Draft EIR Table 5.3-9: Dispersion Modeling Assumptions – BIG** (page 5.3-40), and **Draft EIR Figure 5.3-1** (page 5.3-41) and **Draft EIR Figure 5.3-2** (page 5.3-42).

I1677-18 See **Response I1677-17**.

[8] *Cadiz Land Co. v. Rail Cycle, L.P.* (2000) 83 Cal.App.4th 74, 87.

I1677-19 The Draft EIR concludes construction and operational air quality impacts would remain significant and unavoidable even assuming cleaner equipment. This conclusion demonstrates that the Draft EIR does not downplay impacts based on Tier 4 technology. CEQA expressly allows approval of projects with significant and unavoidable impacts, provided those impacts are fully disclosed and supported by substantial evidence (State CEQA Guidelines §§ 15093, 15126.2). The Draft EIR's acknowledgment that Tier 4 locomotives do not change the significance conclusions underscores the adequacy and transparency of the analysis.

I1677-20 See **Response I1677-19.**

I1677-21 The Draft EIR analyzes actual, foreseeable construction and operational characteristics, including hours of operation, activity levels, number of locomotives, switching intensity, idling time, vehicle trips, etc. Further, **Draft EIR Section 5.3: Air Quality** thoroughly analyzes emissions including both construction and operation emissions. Emissions were calculated using conservative assumptions supported by substantial evidence to ensure impacts are not underestimated. The Draft EIR does not rely on descriptive labels or "marketing language" to reduce or avoid impacts. Instead, it uses reasonable operational assumptions and accepted emission factor methodologies. Refer also to **Response I1677-17**.

I1677-22 See **Response I1677-21.** All assumptions underlying the construction and operational emissions modeling are supported by substantial evidence. The assumptions and supporting substantial evidence are described in Draft EIR pages 5.3-32 through 5.3-49.

I1677-23 See **Response I1677-2**.

I1677-24 See **Response I1677-3**.

I1677-25 See **Response I1677-9**.

I1677-26 **See Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community**.**

The Draft EIR includes a cumulative air quality analysis consistent with State CEQA Guidelines § 15130 and § 15064(h). CEQA requires an EIR to determine whether a project's incremental contribution to cumulative impacts is cumulatively considerable, not to quantify total lifetime or neighborhood-specific exposure from all historic and existing sources. The Draft EIR's cumulative analysis identifies existing and reasonably foreseeable emission sources in BIG's vicinity, including rail and roadway sources, including the existing Barstow Railyard; evaluates BIG's incremental construction and operational contribution to regional and localized air quality conditions using accepted methodologies and thresholds; and concludes that cumulative air quality impacts would be significant, with BIG's contribution considered cumulatively considerable.

State CEQA Guidelines § 15130(b) sets out requirements for defining geographic scope for cumulative impacts analysis: "Lead agencies should define the geographic scope of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used." The DEIR more than clears this bar. For example, for the rail corridor analysis, a one-mile buffer was utilized across a very long expanse extending east and west of BIG along

the main rail corridor in order to grab projects and sensitive receptors. Section 6.4.1 explains why this buffer is reasonable for assessing air quality impacts: "At a distance of 1 mile, which is conservative, given intervening land uses, attenuation patterns, dispersion, etc., it is unlikely any BIG emissions on the corridor could combine with emissions of any cumulative project to result in a significant cumulative air quality impact." In labeling this buffer conservative, the City is not being conservative in terms of geographic scope or minimizing impacts, it is being conservative in terms of trying to wrap in as many projects and receptors as possible, even though projects one mile away from the rail corridor are unlikely to combine with rail impacts to create significant impacts.

Requests to study a larger footprint are inconsistent with State CEQA guidelines and their interpretation by California Courts. The City has the discretion to apply its expertise in selecting an appropriate geographic scope, and a study area that is too large could actually minimize impacts (*South of Mkt. Community Action Network v. City & County of San Francisco* (2019) 33 CA 5th 321, 338; *City of Long Beach v. Los Angeles Unified Sch. Dist.* (2009) 176 CA.4th 889*;' Ebbetts Pass Forest Watch v. Department of Forestry & Fire Protection* (2004) 123 CA.4th 1331, 1352 (affirming state agency's finding that broad cumulative impact assessment area would dilute project's impacts),*E*)[9,10,11,12]

As long as an EIR provides an explanation for the geographic scope of the cumulative impacts analysis, that is sufficient.[6] See also **Consolidated Response 17** concerning health impact analysis.

I1677-27 See **Response I1677-26**.

I1677-28 CEQA does not require an EIR to adopt or evaluate every possible mitigation measure. Instead, CEQA requires an EIR to identify feasible mitigation measures that could substantially lessen significant impacts, but it does not require adoption or detailed evaluation of measures that would be ineffective, infeasible, or outside the lead agency's authority (State CEQA Guidelines § 15126.4(a).[13] See **Consolidated Response 05** concerning feasible and enforceable mitigation.

The Draft EIR identifies and evaluates a comprehensive suite of mitigation measures for construction and operational air quality impacts, including compliance with MDAQMD rules, best available control measures for fugitive dust, and operational controls to reduce emissions where feasible. Even with implementation of all feasible mitigation, the Draft EIR concludes that air quality impacts would remain significant and unavoidable.

The specific measures cited by the commenter are addressed as follows:

9 *South of Market Community Action Network v. City and County of San Francisco* (2019) 33 Cal.App.5th 321, 338. https://research.ceb.com/primary-law/cases/ezqher8

10 *City of Long Beach v. Los Angeles Unified School District* (2009) 176 Cal.App.4th 889.https://research.ceb.com/primary-law/cases/tkuc9us

11 *Ebbetts Pass Forest Watch v. Department of Forestry and Fire Protection* (2004) 123 Cal.App.4th 1331, 1352. https://research.ceb.com/primary-law/cases/3p4zhzb (affirming state agency's finding that broad cumulative impact assessment area would dilute project's impacts)

12 *East Bay Municipal Utility District v. Department of Forestry and Fire Protection* (1996) 43 Cal.App.4th 1113, 1128.

13 *City of Marina v. Board of Trustees of California State University* (2006) 39 Cal.App.4th 341, 368.

Air filtration programs: These measures address indoor exposure and do not reduce project emissions. CEQA does not require mitigation that does not reduce the physical environmental impact being analyzed.

Vegetative buffers: Vegetative buffers do not provide quantifiable reductions in diesel particulate matter sufficient to reduce significance under CEQA thresholds (California Air Pollution Control Officers Association (CAPCOA), *Health Risk Assessment for Land Use Projects*, August 2009, Section 8.3.2 (Unquantifiable Mitigation Measures), p. 16.

Setbacks: Setbacks beyond what is already designed for BIG would be infeasible due to the fixed alignment and operational constraints of the rail infrastructure

Zero emission equipment requirements: To the extent feasible and within regulatory authority, cleaner equipment assumptions are incorporated into the analysis. However, CEQA does not require adoption of speculative or technologically infeasible measures, nor measures that would not reduce impacts to less than significant levels. Additionally, BIG incorporates zero emission (ZE) trucks into its design as a project design feature by including ZE hostlers that would move cargo between the intermodal facility and the transload warehouses. BIG would also use zero-emission rail-mounted gantry cranes, forklifts, top picks/side loaders, and hostlers. These project design features are required to be implemented as part of the Development Agreement. Also see **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 11** concerning energy and power supply, for information on the feasibility of additional zero-emissions mitigation.

I1677-29 See **Response I1677-28**.

I1677-30 CEQA requires evaluation of a range of reasonable alternatives that could feasibly attain most of the project's objectives while avoiding or substantially lessening significant environmental effects (State CEQA Guidelines § 15126.6(a).[14] **Draft EIR Section 8.0: Alternatives** evaluates a range of reasonable alternatives, including alternatives that would reduce overall emissions or avoid certain impacts, and explains why impacts would remain significant or why alternatives would not meet project objectives. CEQA does not require alternatives to be tailored to reduce impacts for a single neighborhood or receptor group, nor does it require selection of an environmentally superior alternative.[15] The alternatives analysis therefore satisfies CEQA.

I1677-31 See **Response I1677-30**.

I1677-32 See **Response I1677-2**. As noted on **Draft EIR Section 5.3: Air Quality** page 5.3-44, the dispersion modeling included a receptor grid with 50-meter spacing for sensitive receptor locations; also shown on **Draft EIR Figure 5.3-3: Centroid, Coarse, and Fine Receptor Grids – BIG** (page 5.3-45). The receptor grid included the Sylvan Community. Additionally, the Draft

14 *Laurel Heights Improvement Assn. v. Regents of the University of California* (1988) 47 Cal.3d 376, 404.
15 *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.App.3d 553, 566.

EIR analyzes localized impacts to nearby sensitive receptors including the Sylvan Community (see Draft EIR pages. 5.3-124 through 5.3-135). Sensitive receptors are identified on **Draft EIR Table 5.3-14: Sensitive Receptors – BIG** (pages 5.3-60 and 61) and **Draft EIR Figure 5.3-4: Sensitive Receptor Locations - BIG** (page 5.3-62) and include the Sylvan Community. Pollutant and health risk contours related to BIG construction can be found on **Draft EIR Figure 5.3-5: Construction Mitigated 24-Hour PM10 Pollutant Concentration Isopleth** (page 5.3-127) through **5.3-15: Combined Construction and Operational Health Risk Assessment – West Leads (Unmitigated)** (page 5.3-152). These contours include the Sylvan Community. As noted in Response I1677-2, the Draft EIR acknowledges that the localized air quality impacts are limited to construction PM10 at a small location along the fence line within the Main Street and Mockingbird Street intersection right-of-way and would not impact sensitive receptors; see **Draft EIR Figure 5.3-5: Construction Mitigated 24-Hour PM10 Pollutant Concentration Isopleth** (page 5.3-127). The Draft EIR conservatively determined that this would have a significant and unavoidable impact with mitigation (mitigated operational localized air quality impacts would be less than significant); see **Draft EIR Table 5.3-31: Maximum Off-Site Concentration from Operations (Mitigated)** (page 5.3-130). Also, the Draft EIR assesses health risk impacts on sensitive receptors on Draft pages 5.3-137 through 5.3-161.

I1677-33 See **Response I1677-3** concerning the Draft EIR's inclusion of Sylvan Avenue as sensitive receptors. The health risk assessment can be found on Draft EIR pages 5.3-137 through 5.3-160. Also, see **Draft EIR Figures 5.3-6: Construction Health Risk Assessment (Unmitigated)** (page 5.3-140)**, 5.3-7: Construction Health Risk Assessment (Mitigated)** (page 5.3-141), **5.3-9: Operations Health Risk Assessment – BIG and East Leads (Unmitigated)** (page 5.3-146)**, 5.3-13: Operations Health Risk Assessment – BIG and East Leads (Mitigated)** (page 5.3-150)**, 5.3-16: Combined Construction and Operational Health Risk Assessment – BIG and East Leads (Unmitigated)** (page 5.3-153)**,** and **5.3-20: Combined Construction and Operational Health Risk Assessment – BIG and East Leads** (page 5.3-157) for health risk contours that include the Sylvan Community. See also **Consolidated Response 17** concerning health impact analysis.

I1677-34 See **Response I1677-9**.

I1677-35 See **Response I1677-28.**

I1677-36 See **Response I1677-26**. A supplemental EIR is not required. Refer also to **Consolidated Response 03** concerning recirculation of the Draft EIR.

1677-37 Tier 4 locomotives are a binding and enforceable part of BIG (see **Consolidated Response 12-03** concerning enforceability of the Project components and mitigation measures for the Project). See **Response I1677-13** and **I1677-17**.

I1677-38 See **Response I1677-21**. Locomotive idling at the BIG intermodal facility would occur as part of normal rail operations, including switching, coupling and decoupling of railcars, crew changes, safety checks, and short dwell periods between active movements. Idling is not the primary operating mode, but an intermittent condition associated with those activities.

In the air quality analysis, locomotive idling time is conservatively accounted for through assumed hours of switcher operation and engine load factors (U.S. EPA, *Emission Factors for Locomotives*, 2009, EPA-420-F-09-025, pages 2 to 3). Locomotive idling time conservatively assuming line-haul locomotives would idle 6.5 hours per train per day, and switcher locomotives would idle for 12 hours per locomotive per day. These assumptions intentionally represent upper-bound operational conditions to ensure emissions are not underestimated.

Idling at BIG would be subject to several existing and required limitations (see **Draft EIR Table 5.3-5: Regulations and Agreements Assumed in the Unmitigated Construction and Operational Emissions** (page 5.3-33)), including:

Federal Locomotive Regulations. Locomotives are required to be equipped with idle reduction technologies, such as automatic engine start stop systems. These systems are designed to shut down engines after a defined idle period when non-operational idling is unnecessary.

Anti Idling Technologies. Tier 4 switcher locomotives incorporate advanced idle management systems that significantly limit extended idling. These systems automatically reduce engine run time during inactivity while maintaining operational readiness and safety.

Operational Practices. BIG is an intermodal yard designed for active freight transfer, not long-term locomotive storage or maintenance. As a result:

- Extended hotel type idling is not anticipated;
- Locomotives would cycle through active duty rather than remain stationary for long durations; and
- Idling would generally occur only as needed for short operational intervals.
- Air Quality Analysis Assumptions

The Draft EIR assumes idling and low power operation as part of total switcher locomotive activity. Importantly, the analysis does not rely on unlimited or continuous idling and instead uses conservative operational hour assumptions that already encompass idling time within total locomotive use (see Draft EIR pages 5.3-37 through 5.3-38, and **Draft EIR Table 5.3-8: BIG Operational Assumptions Summary** (page 5.3-38)).

Locomotive idling at BIG would be limited, regulated, and managed, not unrestricted. Idling time is constrained by modern locomotive technology, federal idle reduction requirements, and the operational nature of an active intermodal yard. These limitations are reflected in the Draft EIR's conservative emissions modeling, which nevertheless concludes that air quality impacts remain significant and unavoidable.

I1677-39 See **Response I1677-28**. All cargo handling equipment would be electric except for the rubber-tired gantry (RTG) cranes, which would be hybrid. BIG would use zero-emission rail-mounted gantry cranes, forklifts, top picks/side loaders, and hostlers. BIG also incorporates zero-emission trucks into its design by including zero-emission hostlers that would move cargo between the intermodal facility and the transload warehouses. See **Consolidated**

Response 05 concerning feasible and enforceable mitigation, and **Consolidated Response 11** concerning energy and power supply.

I1677-40 See **Response I1677-28**. The Draft EIR includes specific, enforceable mitigation measures to reduce construction related fugitive dust and minimize off-site transport of particulate matter to nearby residential areas, including the Sylvan Avenue Community. As described in the Draft EIR, BIG construction would be required to comply with MDAQMD Rule 403 (Fugitive Dust) and implement additional project-specific best available control measures (see LOR AQ-1 on Draft EIR pages 5.3-101 through 5.3-103). These measures include, but are not limited to:

- Regular watering of disturbed areas, unpaved roads, and active grading areas;
- Use of soil stabilizers or temporary ground cover on inactive disturbed surfaces;
- Limiting vehicle speeds on unpaved surfaces;
- Covering or stabilizing haul trucks transporting loose materials;
- Installing wind fencing or equivalent barriers where feasible along the project perimeter; and
- Prompt removal of track-out and visible dust on paved public roads.

These requirements are identified and evaluated **in Draft EIR Section 5.3: Air Quality** and the associated mitigation measures for construction emissions (see Draft EIR pages 5.3-104 through 5.3-105, including **MM BIG AQ-1** through **MM BIG AQ-4**). **MM BIG AQ-1** through **MM BIG AQ-14** are included to mitigate impacts to sensitive receptors. The Draft EIR concludes that implementation of these measures would substantially reduce construction dust emissions, although construction PM_{10} impacts would remain significant due to the scale and duration of construction; see **Draft EIR Table 5.3-29: Maximum Off-Site Construction Pollutant Concentrations (Mitigated)** (page 5.3-126). However, as noted above, the mitigated construction impact would be within the Main Street and Mockingbird Street intersection right-of-way and would not occur at a sensitive receptor area of frequent human use; see **Draft EIR Figure 5.3-5: Construction Mitigated 24-Hour PM10 Pollutant Concentration** (page 5.3-127).

CEQA does not require elimination of all dust emissions, only identification and implementation of feasible mitigation measures to minimize impacts. The Draft EIR satisfies this requirement by incorporating mandatory dust control measures consistent with district rules and best practices (State CEQA Guidelines § 15126.4(a)).

Regarding renewable diesel or zero-emission construction equipment, the Draft EIR evaluates construction emissions assuming compliance with applicable air quality regulations and incorporation of feasible mitigation measures for construction equipment. As disclosed in **Draft EIR Section 5.3 Air Quality**, construction equipment would be required to meet applicable U.S. EPA and California emission standards, including the use of newer-model engines where feasible (pages 5.3-86 through 5.3-87, and page 5.3-105). The Draft EIR also

identifies mitigation measures that require the use of cleaner than required construction equipment, such as:

- Use of newer generation diesel engines meeting Tier 4 standards where feasible (**MM BIG AQ-3**);
- Idling limitations and engine shut-down requirements (LOR AQ-3); and
- Use of alternative fuels, such as renewable diesel, to the extent feasible and available (**MM BIG AQ-4**).

These measures are included as part of the construction air quality mitigation program described in **Draft EIR Section 5.3** (pages 5.3-104 through 5.3-106). The Draft EIR does not assume universal use of zero emission construction equipment because such equipment is not feasible for all heavy-duty construction. CEQA does not require adoption of speculative or infeasible mitigation measures.[16] See **Consolidated Response 05** concerning feasible and enforceable mitigation.

Importantly, even with the use of cleaner fuels and equipment, the Draft EIR concludes that construction air quality impacts would remain significant and unavoidable, which is fully disclosed and supported by substantial evidence.

I1677-41 See **Response I1677-28**. Regarding funding of air filtration systems for nearby homes, given health risk impacts are calculated for outdoor scenarios, indoor air filtration would not result in any quantitative reductions to health impacts, thus, is not mitigation under CEQA.

Regarding continuous air quality monitoring, BIG does not propose air quality monitoring stations, and monitoring itself does not mitigate any significant environmental impacts, thus, was not proposed as mitigation. However, this comment has been provided to decision makers.

I1677-42 **See Responses I1677-2, I1677-3, I1677-4, I1677-8, I1677-9, I1677-12, I1677-26, I1677-28,** and **I1677-40**. A supplemental EIR is not required by CEQA. Also see **Consolidated Response 03** concerning recirculation of the Draft EIR and **Consolidated Response 17** concerning health impact analysis.

I1677-43 This comment provides a general conclusion regarding the comments raised in this letter. See **Responses I1677-2** through **I1677-42**.

16 *City of Marina v. Board of Trustees of California State University* (2006) 39 Cal.app.4th 341, 368.

COMMENT LETTER I1678

I1678

January 2, 2026 5.4 Biological Resources dEIR Response

I, Sherry Baily, submit this comment as a long- time resident living directly adjacent to the proposed Barstow International Gateway (BIG) project site. My home sits within an intact desert ecosystem that I have observed daily for years. Because CEQA requires an accurate, stable, and complete description of the environmental setting, my long-term observations are relevant evidence of existing conditions that the EIR must consider. I1678-1

1. The EIR Fails to Analyze the Ecosystem as a Whole

Section 5.4 evaluates species in isolation, yet the Mojave Desert functions as a tightly interdependent ecosystem. On my land, I regularly observe desert tortoises, tarantulas, hummingbirds, quail, dove, roadrunners, desert foxes, ground squirrels, barn owls, lizards, snakes, Lesser Nighthawks, Cooper's hawk, seasonal turkey vultures and generations of ravens. These species form a functioning food web that maintains ecological balance. I1678-2

The EIR does not analyze how the removal of habitat, introduction of 24/7 industrial activity, and fragmentation of the Mojave River corridor will disrupt predator–prey relationships, avian population stability, or rodent and reptile dynamics. CEQA requires analysis of ecosystem-level impacts, not just species-by-species checklists. I1678-3

2. Outdated and Incomplete Biological Surveys Undermine the EIR's Baseline

The EIR acknowledges that biological surveys were conducted over a **seven-year period** (2018–2025) and often under inconsistent conditions, including surveys conducted outside recommended seasonal windows and surveys performed without full site access, sometimes only with binoculars from a distance. CEQA requires current, seasonally appropriate surveys that reflect existing conditions at the time of environmental review. I1678-4

My own observations contradict the EIR's assumptions about species presence and habitat use. For example, I routinely observe species that the EIR treats as unlikely or marginal. This discrepancy highlights the inadequacy of the EIR's biological baseline. I1678-5

3. The EIR Fails to Address Indirect and Operational Impacts on Wildlife

The EIR focuses primarily on construction impacts, but CEQA requires analysis of **operational impacts**, including noise, lighting, vibration, and human activity. As a resident, I know firsthand that when land is disturbed, wildlife behavior changes dramatically. Soil disruption increases encounters with Mojave green and rattlesnakes. When avian predators are displaced, rodent populations surge. These are foreseeable, indirect impacts that the EIR does not analyze. I1678-6

The EIR also fails to evaluate how 24/7 rail yard operations, permanent fencing, and continuous lighting will affect nocturnal species such as owls, bats, and foxes, or how these changes will alter wildlife movement across the Mojave River corridor. I1678-7

4. Wildlife Movement Analysis Is Superficial and Unsupported

The EIR claims that a single wildlife crossing under the western lead tracks will maintain connectivity. This conclusion is not supported by substantial evidence. Wildlife on my land—including tortoises, foxes, roadrunners, tarantulas, and ravens—move freely across broad, open areas. Their movement is diffuse, not confined to a single point. The project's massive footprint, fencing, and industrial activity will create a barrier that no single crossing can mitigate. I1678-8

CEQA requires a realistic assessment of habitat fragmentation and movement disruption. The EIR does not provide one. I1678-9

5. Cumulative Impacts Are Not Adequately Analyzed

The EIR does not meaningfully evaluate cumulative biological impacts, despite the fact that the High Desert is experiencing rapid industrialization. CEQA requires agencies to consider how multiple projects, combined with climate stressors, drought, and habitat loss, will affect regional wildlife populations. The EIR's failure to address cumulative effects is a significant legal deficiency. I1678-10

6. Personal Observations Demonstrate Real-World Impacts Ignored by the EIR

My relationship with this land is not abstract—it is lived experience. I have watched generations of ravens nest and raise young, observed barn owls hunting at dusk, and seen tortoises forage across the open desert. These species are not theoretical; they are part of a functioning ecosystem that will be irreversibly altered by the BIG project. I1678-11

When development occurs nearby, I experience immediate ecological consequences: increased rattlesnake encounters, loss of avian predators, and shifts in wildlife behavior. These are foreseeable, indirect impacts that CEQA requires the City to analyze. The EIR does not. I1678-12

Section 5.4 of the Draft EIR does not comply with CEQA's requirements for an accurate baseline, analysis of indirect and cumulative impacts, or evaluation of ecosystem-level effects. The document relies on outdated surveys, incomplete data, and unsupported assumptions about wildlife movement and mitigation effectiveness. I1678-13

Given the scale of the Barstow International Gateway project and the sensitivity of the Mojave River corridor, the City must revise and recirculate the Biological Resources section with current surveys, comprehensive ecosystem analysis, and a realistic assessment of operational and cumulative impacts. I1678-14

My lived experience on this land provides substantial evidence that the EIR's conclusions are not supported and that the project's impacts on biological resources are far more significant than disclosed. I1678-15

Best regards to a life well lived.

Sherry Baily, Sylvan Ave Community

RESPONSES TO COMMENT LETTER I1678, SHERRY BAILY

This comment identifies the attached comment letter. See responses below.

The commenter states that the Draft EIR discussed BIG's biological impacts by analyzing species in isolation and not within the greater ecosystem. While **Draft EIR Impact 5.4-1** (pages 5.4-62 through 5.4-95.) analyzes BIG's impacts on specific species, consistent with Appendix G of the State CEQA Guidelines, the Draft EIR also addresses BIG's impacts on loss of "habitat or other sensitive natural communities" under **Draft EIR Impact 5.4-2** (pages 5.4-96), thus addressing not only potential impacts to individual species, but also habitat as well. As explained in the Draft EIR and Biological Resources Technical Reports, numerous field assessments and focused surveys for special-status plants and wildlife and aquatic resources, as well as special-status natural communities and habitats of concern, have been conducted and documented for BIG to support the analyses and findings in the Draft EIR. When a commenter asserts additional analysis or review must be conducted, the lead agency looks at the evidence submitted to support that claim. Here, the commenter has not pointed to any facts, data or other substantial evidence to support their assertion that the Draft EIR only analyzes impacts to species in isolation and does not address impacts on the wider ecosystem. As a result, no further response is required.

The commenter states that the Draft EIR does not analyze the removal of habitat or the fragmentation of wildlife corridors, both of which could result in impacts on the Mojave Desert ecosystem. The Draft EIR addresses BIG's impacts on loss of habitat under **Draft EIR Impact 5.4-2** (pages 5.4-96 through 5.4-98) and addresses wildlife movement corridor impacts in **Draft EIR Impact 5.4-4** (pages 5.4-102 through 5.4-105). Extensive technical studies and analyses were completed by Qualified Biologists to support the Draft EIR analysis, and these reports are available as **Draft EIR Appendix 5.4 BIG-1**. See also **Responses S8-57** through **S8-68** BIG's potential impacts concerning wildlife corridors. Numerous species-specific analyses, habitat modification analyses, wildlife movement analyses, and others are available as Attachments A through HH to **Draft EIR Appendix 5.4 BIG-1**.

To address potential impacts to these issue areas, BIG would be required to implement Mitigation Measure (MM) BIG BIO-32. This mitigation measure would reduce potential impacts respective of wildlife corridor impacts to less than significant levels.

The commentor states that some biological surveys were conducted under less-than-ideal conditions, outside the recommended survey windows or without full site access. The commentator, however, does not indicate which surveys were not conducted in conformance with established protocols and methodologies. All biological surveys for BIG were conducted according to the appropriate methodologies and were completed by Qualified Biologists. All methodologies are detailed in the respective reports and appropriate pre-survey notification letters were sent to CDFW and/or USFWS (as applicable). Survey results are available in **Draft EIR Appendix 5.4 BIG BIO-1**. State CEQA Guidelines § 15125 provides for the establishment of the environmental baseline. CEQA requires that when evaluating the potential impacts of a project, the EIR must examine those impacts against the physical environmental conditions

existing at the time the environmental analysis commenced (i.e., the environmental baseline). The commencement of the environmental analysis is when the Notice of Preparation (NOP) is released. The NOP was released on February 14, 2025, and biological surveys for specific species continued to be conducted through July 2025, see **Draft EIR Section 5.4**. The Draft EIR is adequate and no revisions are required.

The commenter states they have observed species in the area that the Draft EIR states are unlikely or marginal but does not identify the species or provide evidence of presence in the area. As noted in **Consolidated Response 04-01** concerning the scope of CEQA, commenters are advised to support assertions that the lead agency should conduct additional analysis or review with data or other factual references. This is because the lead agency's CEQA conclusion must be based on substantial evidence in the record and not speculation. Here, the commenter has not pointed to any facts, data, or other substantial evidence that support its contention that the DEIR's analysis is flawed. Nonetheless, when a commenter asserts additional analysis or review must be conducted, the lead agency looks at the evidence submitted to support that claim. Here, the commenter does not provide substantial evidence to support their assertion that the Draft EIR did not accurately describe the likelihood of certain species on the site. The comment does not present any new information that any of the special status species a potential to occur in the study area at a rate greater than what was analyzed in the Draft EIR. Therefore, the comment's assertion that such species may be present within the BIG footprint is speculative. Any further study of the species would not be consistent with CEQA because such impacts are speculative given the lack of any evidence that such species are present or have ever occurred within the BIG footprint (State CEQA Guidelines § 15064). No further response is required. Please also see **Response I1678-4**.

BIG operational impacts on biological resources are evaluated for each threshold (identified in **Response I1678-3)** starting on Draft EIR pages 5.4-91, 5.4-97, 5.4-99, 5.4-104, 5.4-106, and 5.4-108. See **Response I1678-3.**

The Draft EIR analyzes BIG operational impacts on biological resources, including nocturnal species. See **Response I1678-6**. To address potential impacts, BIG would be required to implement **MM BIG BIO-36**, Nighttime Lighting During Operations, which includes restrictions on nighttime lighting. This mitigation measure would reduce potential impacts respective of wildlife corridor impacts to less than significant levels. See also **Consolidated Response 09-05** concerning consideration of the Sylvan Community in the lighting analysis and **Consolidated Response 09-08** concerning consideration of Sylvan Community biological resources.

The comment asserts that the Draft EIR's discussion of wildlife movement is inadequate and not supported by substantial evidence. As noted in **Consolidated Response 04-01** concerning the scope of CEQA, commenters are advised to support assertions that the lead agency should conduct additional analysis or review with data or other factual references. This is because the lead agency's CEQA conclusion must be based on substantial evidence in the record and not speculation. Here, the commenter has not pointed to any facts or data that support its contention that the DEIR's analysis is flawed. Nonetheless, in addressing commenter's

concerns, BIG prepared a Biological Resources Technical Report which was made available as **Draft EIR Appendix 5.4 BIG-1**, see Section 4.5 of the appendix concerning wildlife corridors. See **Response S8-57** through **Response S8-68** regarding BIG's potential impacts concerning wildlife corridors. BIG's impacts on wildlife movement and wildlife corridors were evaluated in **Draft EIR Impact 5.4-4** (pages 5.4-102 through 5.4-105). See also **Consolidated Response 09-08** concerning consideration of Sylvan Community biological resources. The Draft EIR determined that existing barriers to movement, such as existing roadways, railways, and developments, limit the ability for many species to move through the BIG footprint to surrounding areas of natural habitat. BIG would implement **MM BIG BIO-32**, which would require the construction of a wildlife crossing at Mile Post 12.5 to facilitate wildlife movement through the BIG footprint, and existing culverts and vehicular crossings underneath the railway may also facilitate the movement of wildlife (Draft EIR page 5.4-103). Of the many existing culverts and vehicular crossings underneath the railway, only five existing culverts and crossings along the railway at Mile Posts 10.9, 10.06, 8.9, 8.2, and 7.0 occur in areas where development would severely limit their function as wildlife crossings. However, to limit these impacts **MM BIG BIO-32** would be implemented. See **Response I1678-3**.

See **Response I1678-8**.

The commentor asserts that the cumulative impacts analysis is unsupported. As noted in **Consolidated Response 04-01** concerning the scope of CEQA, commenters are advised to support assertions that the lead agency should conduct additional analysis or review with data or other factual references. This is because the lead agency's CEQA conclusion must be based on substantial evidence in the record and not speculation. Here, the commenter has not pointed to facts, data, or other substantial evidence that support its contention that the DEIR's analysis is flawed. Nonetheless, in addressing commenter's concerns, the methodology for the cumulative impacts analysis is provided in **Draft EIR Section 6.3: Cumulative Impacts** and with respect to biological resources, in **Draft EIR Section 6.6.4**. The Draft EIR determined that cumulative impacts concerning biological resources would be less than significant with the implementation of mitigation measures.

See **Responses I1678-2** through **I1678-10**. Predation avoidance would be prevented and/or minimized through the implementation of a Raven Management Plan as described in **MM BIG BIO-15**, which includes raven subsidy prevention, raven surveys, and participation in the interagency Raven Monitoring and Management Program to avoid attracting common ravens to BIG by creating food or water subsidies, perch sites, roost sites, or nest sites. Barns Owls are not specifically evaluated and addressed by the Draft EIR as they are not species of special concern nor are they candidate, sensitive, or special status species. Nonetheless, these species would be covered by the protections provided within the Migratory Bird Treaty Act which prohibits the take of any migratory bird or any part, nest, or eggs of any such bird.

The commentor expresses concern that indirect impacts were not discussed and analyzed in the Draft EIR. Indirect impacts on numerous species were evaluated in the Draft EIR, see **Draft EIR Section 5.4: Biological Resources**. Additionally**, Draft EIR Appendix BIG BIO-1 Section 4.6**

describes that both direct and indirect impacts were analyzed. See **Responses I1678-2** through **I1678-10.**

See **Responses I1678-2** through **I1678-10**.

See **Responses I1678-2** through **I1678-10**.

The commenter asserts that their "lived experience" is substantial evidence to support their claims made within their comment letter. State CEQA Guidelines § 15384 provides a definition for substantial evidence. The State CEQA Guidelines state that "substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts." A "lived experience" does not constitute documented facts or an expert opinion. Further, the State CEQA Guidelines state that "unsubstantiated opinion or narrative" does not constitute substantial evidence. The commenter has solely provided unsubstantiated opinion or narrative and has not provided substantial evidence to support their assertions. The commenter's opinions are noted for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the Project and EIR.

COMMENT LETTER I1679

I1679

January 2, 2026 5.5 Cultural Resources dEIR Response

To the City of Barstow, Planners, BNSF Railway:

As a long-time resident living adjacent to the Barstow International Gateway footprint, I am deeply concerned that the Draft EIR fails to adequately analyze or protect one of the most significant cultural resources in the region: the original, still-operating alignment of Route 66. Interestingly, I also discovered that there are 19 identified archeological sites within this footprint! How amazing is that. I1679-1

Section 5.5 acknowledges that segments of Route 66 within the BIG footprint are considered historic and unique archaeological resources, yet the analysis stops short of evaluating how the project will degrade the road's historic integrity, cultural landscape, and experiential value. I1679-2

Route 66 is not merely a strip of pavement. It is a nationally recognized historic property listed on both the NRHP and CRHR, a cultural corridor that has shaped Barstow's identity for generations, and one of the few remaining original alignments still in active use. The Sylvan Ave Community sees travelers walking, cycling, and driving this road — travelers from around the world who come here specifically because Route 66 is alive, authentic, and accessible. I1679-3

The Draft EIR does not evaluate how the BIG project's massive industrial footprint, 24-hour operations, lighting, vibration, and visual obstruction will permanently alter the historic setting and feeling of Route 66. These qualities — setting, feeling, association — are explicitly recognized as required aspects of integrity under federal and state historic-resource criteria. By failing to analyze these impacts, the EIR does not comply with CEQA's requirement to fully disclose and evaluate substantial adverse changes to historical resources. I1679-4

I urge the City to revise the EIR to include a full cultural-landscape analysis of Route 66, evaluate feasible alternatives that avoid or minimize impacts, and incorporate protections such as pedestrian lanes, bicycle access, and visual-context preservation. **Route 66 is a living cultural resource, and its protection is essential to Barstow's identity, economy, and heritage.** I1679-5

2. CEQA Argument: Cultural Landscape Impacts to Route 66

Under CEQA Guidelines §15064.5, a project causes a significant impact to a historical resource when it "materially impairs the resource's significance." For Route 66, significance is derived not only from its physical roadbed but from its **cultural landscape** — the surrounding desert openness, historic viewsheds, travel experience, and sense of place. I1679-6

The Draft EIR fails to meet CEQA requirements in the following ways: I1679-7

A. Failure to Evaluate Cultural Landscape Integrity

The EIR acknowledges Route 66 as a historic resource but does not evaluate how the BIG project will alter the several aspects of integrity:

> **Setting** – The project introduces massive industrial structures, lighting, and freight activity that fundamentally change the historic desert corridor.
>
> **Feeling & Association** – The historic travel experience is inseparable from the landscape. Industrializing the corridor destroys the sense of traveling the Mother Road.
>
> **Design, Materials, Workmanship** – Construction activities may alter or disturb original road features.

I1679-7 cont'd

CEQA requires analysis of these integrity aspects; the EIR omits them. I1679-8

B. Failure to Consider Route 66 as a Cultural Landscape

CEQA recognizes cultural landscapes as historical resources when they derive significance from patterns of human use. Route 66 is one of the most iconic cultural landscapes in the United States. The EIR treats it as a static object rather than a dynamic, experiential corridor. I1679-9

C. Failure to Analyze Indirect Impacts

The EIR acknowledges that cultural resources may be affected by changes in visibility, access, and visual context, yet it does not apply this framework to Route 66. Indirect impacts include:

> Loss of historic viewsheds
>
> Increased noise and vibration
>
> Industrial lighting and skyglow
>
> Traffic congestion altering the travel experience
>
> Visual dominance of freight infrastructure
>
> Decrease of land and property values of the Sylvan Ave Community

I1679-10

These are substantial adverse changes under CEQA. I1679-11

D. Failure to Evaluate Feasible Mitigation

The EIR does not consider:

> Pedestrian and bicycle lanes beyond the proposed employee entrance.
>
> View corridor protections

I1679-12

Interpretive signage

Context- sensitive design

Avoidance alternatives

Traffic- calming measures

Noise and vibration buffers

I1679-12 cont'd

CEQA requires consideration of feasible mitigation even when impacts are significant and unavoidable.

I1679-13

3. Centennial- Year Advocacy Strategy (2026)

Route 66 turns 100 in 2026 — a once- in- a- lifetime moment.

National Heritage Crisis

> "One of the last continuously operating original segments of Route 66 is at risk of being overshadowed by a 24/7 freight megaproject — just as the nation prepares to celebrate the Mother Road's 100- year anniversary."
>
> Route 66 is used frequently by walkers, cyclists, and tourists. With the increase of road traffic, pedestrian lanes protect both safety and heritage.

I1679-14

City of Barstow, how will you use this time wisely to preserve our cultural landscape?

I respectfully request that the City of Barstow and BNSF respond to these concerns and questions in writing. Please commit to a community - centered process as the project consideration moves forward.

I1679-15

To live in awe of life - priceless.

Sherry Baily

Sylvan Ave Community/Route 66 Advocacy

RESPONSES TO COMMENT LETTER I1679, SHERRY BAILY

I1679-1 The Draft EIR includes a comprehensive analysis of potential impacts to cultural resources. **Draft EIR Section 5.5: Cultural Resources** evaluates BIG's potential to significantly impact cultural resources within or near the BIG footprint. The Draft EIR noted and evaluated nineteen prehistoric archaeological sites and certain segments of Route 66 that are considered historic and unique archaeological resources. However, segments of Route 66 are overwhelmed by modern development and/or have been realigned and therefore lack the integrity sufficient to convey the resource's significance. Specifically, the eastern portions of Route 66 that are located within the BIG footprint and Specific Plan Area were determined to have been heavily modified and are not particularly recognizable as Route 66 due to lack of period-significant businesses and landmarks that connect the segment to the important events in history that make Route 66 significant. As mentioned in the Regulatory Settings of **Draft EIR Section 5.5: Cultural Resources**, to be eligible for listing in the California Register of Historical Resources (CRHR) a resource must meet at least one of the following criteria:

- Is it associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage California or the United States.
- Is associated with the lives of person important to local, California, or national history.
- Embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of a master; or possesses high artistic values.
- Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

In addition to having significance, the resource must have integrity for the period of significance. The period of significance is the date or span of time within which significant events transpired, or significant individuals made their important contributions. Alterations to a resource or changes in its use over time may change its historical, cultural, or architectural significance. Resources must retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance.

While Route 66 as a whole is significant, several portions of the road, including the segment within BIG footprint, no longer retain sufficient integrity to effectively contribute to the significance of the resource. There is no discernable cultural landscape nor any associated characteristics, such as historic structures or period-appropriate signage, which would make the segment of Route 66 within the BIG footprint recognizable as a historical resource or that would effectively convey the significance of the resource. Route 66 retains integrity of workmanship in that it runs its original course, but the road has been updated/reconstructed several times and no longer retains any material integrity. As concluded in the Draft EIR, there are no impacts identified that would occur to this segment of Route 66 that is within the BIG footprint, as a result of BIG implementation, as it is non-contributing to the significance of the entirety of Route 66. As such, no mitigation was proposed in the Draft EIR, as there were no

impacts to this segment of Route 66 to mitigate. As such, BIG is not anticipated to cause a substantial adverse change in the significance of Route 66.

I1679-2 through I1679-14 See **Response I1679-1** concerning the analysis of potential impacts to Route 66.

I1679-15 See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER I1680

I1680

January 2, 2026 5.6 Energy dEIR Response

As I, Sherry Baily, look at this 5.6 Energy section - I admit, I am not well versed; however, some things don't add up. For public record and comment, I would like it to be noted - The EIR says two things that **cannot both be true**: I1680-1

Energy Section says:

BIG will reduce diesel use by shifting trucks to trains.

Renewable diesel will be used. I1680-2

Solar will offset electricity use.

Energy impacts are "less than significant."

Air Quality Section says:

BIG will create **massive diesel emissions** from trucks, locomotives, and equipment.

Diesel pollution will be **significant and unavoidable**. I1680-3

Health risks from diesel exhaust will be **significant**.

No meaningful reductions from renewable diesel or solar are included in the modeling.

The Energy section paints a "green" picture. The Air Quality section shows a "dirty diesel" reality. The EIR sections contradict each other. Energy says diesel use will go down. Air Quality says diesel emissions will be massive. I1680-4

CEQA should require these sections to match. They don't. It demonstrates an inconsistency. I1680-5

The EIR uses promises instead of proof. I1680-6

City of Barstow, what will you do to ensure measureable and enforceable perimeters of those who want to development here? I1680-7

The Energy section says BIG will save energy because it *plans* to use renewable diesel and solar. Energy claims renewable diesel will be used — Air Quality does not model it. I1680-8

If renewable diesel is a mitigation measure, it must be included in the emissions modeling. It isn't. I1680-9

But doesn't CEQA requires **evidence**, not promises. I1680-10

The EIR never shows the math. There is no clear calculation of: I1680-11

How much electricity BIG will use

Whether the grid can handle it

How much diesel will actually be burned

How much solar will actually offset

Without numbers, the EIR cannot legally conclude impacts are "less than significant." I1680-11 cont'd

The EIR ignores the people living closest to the project. The Sylvan Avenue Community is:

Next to the rail yard

Downwind of diesel exhaust

Dependent on private wells

Vulnerable to power outages

CEQA requires analysis of **sensitive receptors**. The EIR does not analyze Sylvan Avenue at all. I1680-12

The EIR ignores grid reliability. BIG will need:

New substations

New transmission lines

Huge amounts of electricity

But the EIR never analyzes: I1680-13

Whether SCE can supply it

Whether outages will increase

Whether nearby homes will lose reliability

Isn't this a **major CEQA omission**.

Energy claims impacts are "less than significant" — Air Quality finds "significant and unavoidable" impacts. I1680-14

These conclusions cannot both be true.

Energy ignores the health impacts of diesel combustion — Air Quality shows major health risks. I1680-15

Energy cannot claim efficiency while ignoring the pollution created by that energy use. I1680-15 cont'd

Why This Matters for the Sylvan Avenue Community - Sylvan Avenue residents are:

Closest to the rail yard

Downwind of diesel exhaust

Dependent on private wells

Vulnerable to power outages

Already exposed to arsenic in groundwater I1680-16

This means:

Diesel emissions hit our homes first.

Grid instability hits our homes first.

Any contamination hits our wells first.

Any failure of mitigation hits our homes first.

CEQA requires **extra protection** for communities like ours. The EIR provides **none**. I1680-17

Questions for SCE (Southern California Edison) I1680-18

1. Can the existing grid in Barstow reliably supply the massive electricity demand of the BIG project without increasing outages for nearby homes?
2. What new substations, transformers, or transmission lines will be required to power BIG? I1680-19
3. Will Sylvan Avenue residents experience reduced grid reliability or more frequent outages due to BIG's energy demand? I1680-20
4. Has SCE conducted a load- flow study for the BIG project? If so, will it be made public? I1680-21
5. What protections will SCE provide to ensure residential customers are not deprioritized during peak demand created by BIG? I1680-22

Questions for the City of Barstow I1680-23

1. Why does the Energy section claim diesel use will decrease when the Air Quality section shows massive diesel emissions?
2. Why does the EIR not analyze grid reliability impacts on nearby residents, especially those on Sylvan Avenue? I1680-24
3. What specific mitigation measures will the City require to protect residents from increased outages or brownouts? I1680-25

4. Why does the EIR not analyze the cumulative energy burden on a community already facing water contamination and air pollution? I1680-25 cont'd
5. Will the City require BNSF to fund grid upgrades so residents are not harmed? I1680-26

Questions for BNSF

1. How will BNSF ensure that its enormous electricity demand does not reduce grid reliability for nearby homes? I1680-27
2. Will BNSF commit to installing on-site battery storage to reduce peak load impacts? I1680-28
3. Why does the Energy section claim renewable diesel will be used when the Air Quality section does not model it? I1680-29
4. Will BNSF commit to 100% zero-emission cargo-handling equipment to reduce diesel use? I1680-30
5. What is BNSF's plan if SCE cannot supply the required power without harming residential customers? I1680-31

I respectfully request clarity in writing to the above concerns and questions. Please commit to a community-centered process and consideration when making your decisions. I1680-32

Thank you for your time and consideration.

Sherry Baily

Sylvan Ave Community

RESPONSES TO COMMENT LETTER I1680, SHERRY BAILY

I1680-1 This comment is introductory to the comments that follow. See **Consolidated Response 04** concerning general non-CEQA issues.

I1680-2 This comment summarizes the conclusions from the Draft EIR. See **Consolidated Response 04** concerning general non-CEQA issues.

I1680-3 The comment asserts that **Draft EIR Section 5.3: Air Quality** and **Section 5.6: Energy** are inconsistent and that each section's conclusions cannot be true at the same time. As noted in **Consolidated Response 04-01** concerning the scope of CEQA, commenters are advised to support assertions that the lead agency should conduct additional analysis or review with data or other factual references. This is because the lead agency's CEQA conclusion must be based on substantial evidence in the record and not speculation. Here, the commenter has not pointed to any facts or data that support its contention that the DEIR's analysis is flawed. Nonetheless, in addressing commenter's concerns, CEQA requires separate and distinct analyses for energy use and air quality impacts. While related, these topics are evaluated under different CEQA standards, thresholds, and methodologies, and therefore may reasonably reach different conclusions.

Under CEQA, energy impacts and air quality impacts are analyzed under separate criteria. Energy impacts are evaluated pursuant to State CEQA Guidelines Appendix F, which focuses on whether the project would result in the wasteful, inefficient, or unnecessary consumption of energy; whether the project would conflict with applicable energy conservation plans or policies; and whether feasible energy efficiency measures and renewable energy features are incorporated.

Air quality impacts, by contrast, are evaluated using air district–specific significance thresholds (e.g., for the Mojave Desert Air Basin, Mojave Desert Air Quality Management District thresholds). Air quality impacts are evaluated with quantitative modeling of pollutant emissions such as VOC, NO_X, CO, PM_{10}, and $PM_{2.5}$ and comparison to the air applicable thresholds, which include separate criteria for construction emissions, operational emissions, and health risk. Because these analyses serve different regulatory purposes, they may legitimately reach different significance conclusions without being inconsistent.

Draft EIR Section 5.6: Energy concludes that BIG's impacts are less than significant, which reflects the CEQA considerations, including that BIG reduces overall diesel consumption per unit of freight movement by shifting a portion of goods movement from trucks to trains, which are more energy efficient on a ton mile basis. Additionally, BIG incorporates renewable diesel, solar generation, and electrification measures, which reduce reliance on fossil fuels. These features demonstrate that BIG is not wasteful or inefficient in its use of energy and is consistent with applicable energy policies (in compliance with State CEQA Guidelines Appendix F).

Importantly, Appendix F does not require a project to eliminate diesel use or avoid air pollutant emissions altogether. Rather, it evaluates whether energy use is reasonable and

efficient given the project's purpose. A project can consume large amounts of energy and still have a less-than-significant energy impact if it does so efficiently and with conservation measures in place.

Draft EIR Section 5.3: Air Quality evaluates a different question: whether emissions of air pollutants exceed regulatory thresholds or cause substantial adverse health effects. Even with energy efficiency measures, BIG would still generate substantial diesel exhaust construction and operational emissions from trucks, locomotives, and certain equipment due to BIG's scale and operational intensity.

Air district mass emission significance thresholds are applied uniformly to all projects, regardless of project size, land use, or purpose. The thresholds represent fixed limits adopted by the air district to determine whether a project's emissions would cause a cumulatively considerable contribution to regional air pollution. As such, a small project and a large project are evaluated against the same numeric thresholds; the difference is not in the criteria applied, but in whether each project's projected emissions exceed those thresholds.

Draft EIR Section 5.6: Energy concludes BIG's impacts are less than significant because BIG uses energy efficiently and incorporates conservation measures, consistent with State CEQA Guidelines Appendix F. **Draft EIR Section 5.3: Air Quality** concludes BIG's impacts are significant and unavoidable because BIG would exceeds air district thresholds, even after considering and accounting for all feasible mitigation. See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community, **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor, **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis, and **Consolidated Response 12** concerning the Project Description and enforceability. These conclusions are not contradictory but instead reflect CEQA's requirement to evaluate different environmental issues using different standards. Both conclusions can be true simultaneously, and together they provide a complete and legally defensible assessment of BIG's environmental effects.

I1680-4 See **Response I1680-3** and **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis. **Draft EIR Section 5.6** states that BIG construction would reduce diesel fuel usage by optimizing site grading, prioritizing the use of rail transport, and recycling 65 percent of construction waste. The air quality analysis also reflects minimized diesel fuel usage with implementation of mitigation measures and project designs. The Energy section evaluates whether BIG would result in wasteful or inefficient energy use under State CEQA Guidelines Appendix F and appropriately considers design features such as rail use, renewable diesel, and solar that reduce overall fuel consumption. The Air Quality section, by contrast, evaluates pollutant emissions and health impacts using applicable significance thresholds.

I1680-5 The commenter raises concerns that the significance determinations for Air Quality and Energy need to "match". See **Responses I1680-3** and **I1680-4**.

I1680-6 All environmental analyses in the EIR rely on the Project Description. Once an EIR is certified and a project is approved, the lead agency may not approve or allow implementation of a project that materially differs from the Project Description without additional CEQA review. Project components are enforced through the lead agency's discretionary approvals. The Project Description is incorporated into conditions of approval, development agreements, and entitlements. An applicant is legally bound to construct and operate the project as approved. CEQA relies on conditions of approval, development agreements, design review approvals, building permits, certificates of occupancy, and other operational permits (e.g., Conditional Use Permits, air permits) to ensure the project that was environmentally reviewed is the project that gets built and operated.

Additionally, State CEQA Guidelines §§ 15041, 15097, and 15126.4 requires mitigation measures to be feasible, specific enough to be implemented, and fully enforceable through legally binding mechanisms. Once mitigation measures are adopted, the lead agency must also adopt a Mitigation Monitoring and Reporting Program (MMRP) which identifies each mitigation measure, specifies when it must be implemented, identifies the responsible party, identifies the monitoring entity, and ties compliance to permit issuance, construction milestones, or operation. The MMRP is a binding administrative instrument. Failure to comply is a violation of project approval conditions.

Courts have consistently held that approval of a project different from what was analyzed violates CEQA, which is why agencies strictly tie permits and inspections to the approved project description. Therefore, the Project components analyzed in the Draft EIR would be required to be implemented.

I1680-7 This comment does not raise any environmental concerns about adequacy of the Draft EIR. However, the City of Barstow will ensure measurable and enforceable parameters for future development through a combination of CEQA requirements, discretionary approvals, and enforceable conditions of approval. Where applicable, the City may require developer agreements or conditions of approval that impose measurable performance standards, reporting obligations, and enforcement mechanisms, including remedies for noncompliance.

I1680-8 The BIG analysis evaluates **MM BIG AQ-4** and **MM BIG AQ-8** to implement renewable energy. **MM BIG AQ-4** requires the use of renewable diesel fuel from heavy-duty diesel-fueled construction equipment and off-road heavy diesel trucks. **MM BIG AQ-8** requires Rubber Tired Gantry (RTG) cranes to be powered with renewable diesel. Additionally, BIG would modify the fuel blend used within the Ports' existing fueling site to use ten percent renewable diesel (see Draft EIR page 3-48). These mitigation measures and project components are modeled in air quality emissions calculations and shown in the mitigated emissions tables (**Draft EIR Table 5.3-21: Mitigated Construction Emissions (pounds per day)** (page 5.3-86), **Table 5.3-22: Mitigated Construction Emissions (tons per year)** (page 5.3-87), **Table 5.3-26: Mitigated Operational Emissions within MDAB (pounds per day)** (page 5.3-96), and **Table 5.3-27: Mitigated Operational Emissions Within MDAB (tons per year)** (page 5.3-99)); also

see Appendix A of **Appendix 5.3 BIG-1** and **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis.

I1680-9 See **Response I1680-8** and **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis. The comment asserts renewable diesel is not included in the emissions modeling.

I1680-10 See **Response I1680-8** and **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis. All assumptions are supported by substantial evidence.

I1680-11 The comment asserts that the Draft EIR does not show calculations of electricity consumption, diesel consumption, and solar offset. As noted in **Consolidated Response 04-01** concerning the scope of CEQA, commenters are advised to support assertions that the lead agency should conduct additional analysis or review with data or other factual references. This is because the lead agency's CEQA conclusion must be based on substantial evidence in the record and not speculation. Here, the commenter has not pointed to any facts or data that support its contention that the DEIR's analysis is flawed. Nonetheless, in addressing commenter's concerns, construction and operational energy consumption is included in **Draft EIR Table 5.6-12: Projected Annual BIG Energy Consumption During Construction** (**page 5.6-35**) and **Draft EIR Table 5.6-13: Projected Annual BIG Energy Consumption During Operations** (**page 5.6-36**), respectively, in **Draft EIR Section 5.6: Energy**. Calculations and assumptions are included in **Draft EIR Appendix 5.6 BIG-1 Energy Assessment**.

Draft EIR Table 5.6-13 shows that BIG would consume 1,541,726 gallons of diesel per year without mitigation. Additionally, Draft EIR **Table 5.6-14: Estimated Future Electricity Consumption - BIG** (**page 5.6-39**) shows that BIG would have a peak electrical demand of approximately 64.9 megawatts (MW) (145,258 MWh/year). Approximately and 49,200 MWh/year is anticipated to be generated by the solar farm and an additional 11,680 would be generated from rooftop solar on the transload warehouses. **Consolidated Response 11: Energy and Power Supply** also explains that BIG is designed to maintain reliability through phased buildout, required pre-demand electrical upgrades, and coordination with SCE rather than overloading Barstow's existing system. It also emphasizes reduced reliance on the grid via on-site generation (an approximately 21 MW solar farm plus required rooftop solar under CALGreen), helping to minimize peak demand and the risk of outages for surrounding communities. As BIG would be required to minimize energy consumption (**MM BIG EN-2**) and generate on-site renewable energy (**MM BIG EN-1**), BIG would rely on renewable energy to the most feasible extent, generating approximately 49 GWh from the proposed solar farm, approximately 12 GWh from code-required rooftop solar, and approximately 31 GWh from additional rooftop solar above code requirements (**MM BIG EN-1**), and its impacts would be less than significant after mitigation. Further, Southern California Edison (SCE) would continue to increase electricity generation from renewable sources.

BIG incorporated power-reliability planning from the earliest design and environmental review stages. Rather than relying on Barstow's existing electrical system to absorb a sudden,

large new load, BIG was structured to add capacity before demand, phase power-intensive uses gradually, and reduce reliance on the regional grid. **Draft EIR Section 3.0: Project Description** notes that BIG includes a private on-site solar energy facility located within its footprint. The purpose of this private utility is to supply a substantial portion of the facility's operational power internally rather than drawing it all from the local grid. By generating electricity on site BIG reduces peak demand on the regional utility system, insulates local neighborhoods from sudden load increases, and minimizes the risk of brownouts or service interruptions during high-use periods.

BIG operations would occur over a multi-decade planning horizon and would be aligned with infrastructure readiness. Power-intensive components such as intermodal equipment, rail yard operations, and warehouse facilities are brought online gradually. Electrical upgrades would be completed before new demand as introduced, ensuring that load growth to be predictable and manageable.

Draft EIR Section 3.0: Project Description identifies off- and on-site utility improvements as part of BIG's scope. These upgrades include new distribution infrastructure sized specifically for BIG's operational needs. It is noted that power infrastructure improvements must be completed in advance of each phase, BIG does not depend on existing residential or commercial feeders, and utility coordination has occurred and would continue to occur with SCE to ensure no degradation of service to current customers.

BIG's use of zero-emission cargo-handling equipment has been planned in accordance with CEQA feasibility requirement and infrastructure capacity and not through sudden mandates. This avoids the scenario where large electric loads are imposed before sufficient generation and distribution capacity exists. This approach prevents sudden spikes in electricity demand, avoids forcing local emergency upgrades, and maintains reliability for both BIG and surrounding communities.

See **Consolidated Response 11** concerning energy and power supply.

I1680-12 See **Responses S6-2, I1677-2, I1677-3, I1677-9, I1677-32**, and **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor. The **Draft EIR Section 5.3: Air Quality** analyzes localized impacts to nearby sensitive receptors including Sylvan communities (pages. 5.3-124 through 5.3-135). Also, **Draft EIR Section 5.3** assesses health risk impacts on sensitive receptors on pages 5.3-137 through 5.3-161.

I1680-13 See **Response I1680-11**. BIG operational electric power demand would be met through connecting to the SCE Tortilla Substation (described in **Draft EIR Section 3.7.10: Off-Site Improvements**) and supplemented with on-site electrical generation including an approximately 140-acre, approximately 21 MW solar power generation facility (i.e., solar farm). The solar farm would include a new substation at the northwest corner of the solar farm to route power from the solar farm to the BIG rail yard. Additionally, BIG would comply with CALGreen regulations requiring that rooftop solar generation be installed on the industrial warehouse rooftops (Title 24, Section 140.10). Based on 9.0 million square feet of

transload warehouse, BIG would include approximately 6.4 megawatts (MW) of rooftop solar generation for Title 24 compliance. As described in **Draft EIR Section 3.0: Project Description**, BIG would construct three substations and additional 33 kilovolt (kV) distribution lines.

California courts have consistently held that economic, service, and operational considerations, such as the adequacy or reliability of public utilities, are not environmental impacts unless they result in a physical change to the environment. The commenter's concerns regarding whether SCE can supply electricity, whether outages might occur, or whether reliability might change for nearby homes relate to utility operations and service reliability, not to a physical environmental impact attributable to BIG. CEQA does not require analysis of speculative service interruptions or grid-management decisions made by a regulated utility (State CEQA Guidelines § 15145. However, BNSF has been regularly coordinating with SCE on BIG's electrical demand and has verified that, by connecting SCE's Tortilla substation with a power budget of 66 MW, SCE would be able to serve BIG's electrical demand.

The commenter's assertion that the EIR must analyze whether outages would increase or whether nearby homes would "lose reliability" misstates CEQA's requirements. CEQA does not require agencies to analyze grid failures, blackout scenarios, cascading utility system risks, or hypothetical service interruptions, absent evidence that the project would cause a physical environmental impact through such events (State CEQA Guidelines § 15131. Utility reliability is governed by CPUC-regulated planning processes, including integrated resource planning, distribution planning, and system reliability standards. CEQA allows agencies to rely on these existing regulatory programs and does not require duplicative analysis.

I1680-14 See **Responses I1680-3, I1680-4,** and **I1680-5**.

I1680-15 See **Responses I1680-3, I1680-4,** and **I1680-5**. Pursuant to State CEQA Guidelines, **Draft EIR Section 5.6: Energy** analyzes if BIG would result in the wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or obstruct a State or local plan for renewable energy or energy efficiency. The energy analysis is limited to consumption, renewable energy, and energy efficiency and is not required to analyze health risks associated with diesel combustion. As noted by the commenter, an analysis of health risks associated with diesel combustion has been included in **Draft EIR Section 5.3: Air Quality**.

I1680-16 See **Responses I1680-3, I1680-4,** and **I1680-5**, and **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor. Additionally, it is noted that BIG would not exacerbate arsenic levels in groundwater. BIG would expand Golden State Water Company infrastructure to the western extent of the City, enabling nearby residents to connect to Golden State Water Company water lines and potentially reducing the reliance on groundwater.

I1680-17 See **Consolidated Response-09** concerning BIG's potential effects on the Sylvan Community and **Response I1680-12** above. **Draft EIR Section 1.0: Executive Summary** (pages 1-43 to 1-94) provides an inventory of the mitigation measures, which the Draft EIR identified to reduce

BIG's significant effects within the relevant study areas (see **Consolidated Response 06-01** concerning the geographic scope of the environmental analysis and definition of study area) to less than significant. BIG's significant effects which could not be reduced to less than significant despite incorporation of mitigation measures are found in the "Project Impacts and Mitigation Measures" and the "Significant Unavoidable Impacts" subsections in **Draft EIR Sections 5.1** through **5.17.**

Public Resources Code § 21081.6 requires that all public agencies establish monitoring and reporting procedures for mitigation adopted as conditions of approval to mitigate or avoid significant environmental impacts. As required by Public Resources Code § 21081.6, the City of Barstow has developed a Mitigation Monitoring and Reporting Program (MMRP) to provide a mechanism by which to monitor the mitigation measures applicable to BIG. The City of Barstow, as the Lead Agency for the Project, would be responsible for ensuring MMRP implementation.

As such, **Draft EIR Sections 5.1** through **5.17** have identified feasible mitigation measures to avoid/lessen significant adverse impacts. To the extent that the Community's single-family residences have experienced significant adverse impacts, the applicable/feasible mitigation measures would be incorporated.

CEQA is a procedural disclosure statute that applies uniform standards statewide. It does not establish a separate or heightened impact standard requiring "extra protection" for particular communities beyond the analysis of physical environmental impacts required for all projects (State CEQA Guidelines § 15002). Courts have consistently held that CEQA's purpose is to ensure informed decision-making through disclosure and mitigation of significant environmental effects, not to guarantee particular social or distributive outcomes.[17] Environmental justice, while an important policy consideration, is not a required stand-alone topic of analysis under the State CEQA Guidelines or Appendix G. The absence of a separate "environmental justice" section does not constitute a CEQA deficiency. CEQA requires evaluation of whether a project would cause significant physical environmental impacts, regardless of the identity or characteristics of the affected population (State CEQA Guidelines §§ 15064, 15126.2).

The comment does not identify a specific environmental topic area, a CEQA threshold that was misapplied, or a physical environmental impact that was not analyzed. Accordingly, the claim that the Draft EIR "provides none" of the protections required by CEQA is not supported by evidence and does not demonstrate a violation of CEQA.

The Draft EIR complies with CEQA by identifying, analyzing, and mitigating significant physical environmental impacts in accordance with applicable standards. CEQA does not require a separate or heightened level of protection for specific communities beyond this analysis. No revisions to the Draft EIR are required in response to this comment.

[17] *Baird v. County of Contra Costa* (1995) 32 Cal.App.4th 1464, 1477–1478.

I1680-18 See **Response I1680-11**.

I1680-19 See **Response I1680-13**. As noted above and in **Draft EIR Section 3.7.10: Off-Site Improvements**, BIG would construct three substations (two substations at the eastern and western extents of the rail yard and one substation within the solar farm). BIG operational electric power demand would be met through connecting to the SCE Tortilla Substation and supplemented with the 21 MW solar farm. In addition to the three new substations, BIG would construct additional 33 kV distribution lines. SCE would make modifications, which include constructing new feeders and new power distribution lines. Within the Tortilla Substation's existing fence line, SCE would also make modifications to supply their new feeders from their existing 115 kV-33 kV transformers.

I1680-20 See **Consolidated Response 11** concerning energy and power supply.

I1680-21 A load-flow study is a detailed electrical engineering analysis that evaluates voltage drops, thermal loading, feeder and substation capacity, contingency conditions, and system stability under projected demand. These studies are normally conducted after land-use entitlements, once electrical demand, phasing, and equipment specifications are finalized. Utilities such as SCE typically perform them as part of the formal service request/interconnection process, not during CEQA review. See **Draft EIR Appendix 5.17 BIG-1: Utility Assessment Technical Report**. The Utility Assessment Technical Report analyzes BIG's impact on the existing electrical infrastructure by describing the proposed improvements and how they may be connected to the existing local power grid. BIG electrical usage and diversity of that usage is based on adding up the loads of the various electrical equipment, buildings, and lighting planned for BIG, which is provided by equipment manufacturers. SCE uses this information to determine the improvements to their infrastructure necessary to serve BIG's electrical usage. BIG's electric power usage and diversity of that usage is based on the sum of the loads of BIG's proposed buildings, lighting, and electric equipment.

I1680-22 Residential customers cannot be deprioritized in favor of BIG. SCE is legally and operationally required to protect residential service reliability through California Public Utilities Commission (CPUC) rules, utility planning standards, load-shedding protocols, and demand-response hierarchies, regardless of how large the BIG load becomes.

Under CPUC regulation (California Public Utilities Code §§ 451 and 453[a]), SCE may not prioritize service to an industrial or commercial customer at the expense of residential customers. All customers are served under filed tariffs, and SCE is required to plan its system so that new loads do not degrade existing service. If additional load (such as BIG) cannot be served reliably, SCE must require infrastructure upgrades, delay service, or condition interconnection on mitigation. It cannot shift risk to residential customers. Residential customers are not interruptible by default and are protected unless there is a system-wide emergency threatening grid stability.[18]

[18] https://www.cpuc.ca.gov/news-and-updates/all-news/cpuc-decision-in-edison-rate-case-prioritizes-affordability-safety-and-reliability

I1680-23 See **Responses I1680-3, I1680-4,** and **I1680-5**.

I1680-24 See **Response I1680-13**.

I1680-25 See **Responses I1680-11, I1680-12, I1680-13,** and **I1680-22**. No additional mitigation is required because BIG would not result in a significant impact to electric service reliability. The Draft EIR evaluates utilities and service systems and concludes that electric service would be provided by the serving utility in accordance with adopted standards and regulations, and that new or upgraded infrastructure would be constructed as needed to serve demand prior to occupancy. In addition, BIG includes a private on-site renewable energy component (solar facility) intended to offset on-site demand and reduce reliance on the regional grid during peak periods, further reducing the potential for localized service constraints.

The Draft EIR did not identify a significant cumulative energy burden impact, and therefore additional cumulative mitigation is not required. BIG's energy demand is served through new or upgraded infrastructure, rather than shifting costs or service constraints to nearby residents.

I1680-26 See **Response I1680-13.**

I1680-27 See **Response I1680-13**.

I1680-28 See **Response I1680-13**. As noted above and in **Draft EIR Section 3.7.10: Off-Site Improvements**, BIG's solar farm would include a new substation at the northwest corner of the solar farm to route power from the solar farm to the BIG rail yard and reduce peak load impacts.

I1680-29 See **Response I1680-8**. Renewable diesel is emission reductions are incorporated in air quality emissions calculations and shown in the mitigated emissions tables (**Draft EIR Table 5.3-21: Mitigated Construction Emissions (pounds per day), Table 5.3-22: Mitigated Construction Emissions (tons per year), Table 5.3-26: Mitigated Operational Emissions within MDAB (pounds per day),** and **Table 5.3-27: Mitigated Operational Emissions Within MDAB (tons per year)).** Additionally, BIG would modify the fuel blend used within the Ports' existing fueling site to use ten percent renewable diesel.

I1680-30 See **Response I1677-28**. All cargo handling equipment would be electric except for the rubber-tired gantry (RTG) cranes, which would be hybrid. BIG would use zero-emission rail-mounted gantry cranes, forklifts, top picks/side loaders, and hostlers. BIG also incorporates zero-emission trucks into BIG's design by including zero-emission hostlers that would move cargo between the intermodal facility and the transload warehouses.

I1680-31 See **Response I1680-13**.

I1680-32 This comment provides a general conclusion regarding the comments raised in this letter. See **Response I1680-2** through **I1680-31**.

COMMENT LETTER I1681

January 2, 2026 5.10 Hyrology dEIR Response

I, Sherry Baily, submit this public comment letter as a public record and concern regarding how the EIR fails to analyze impacts to Private Domestic Wells Adjacent to the BIG Project. I1681-1

The Sylvan Avenue neighborhood relies entirely on **private domestic wells** for drinking water, cooking, bathing, and all household uses. These wells draw from **shallow groundwater** of the Mojave Basin. CEQA requires analysis of **site-specific receptors**, yet the Draft EIR evaluates groundwater impacts only at a **basin-wide scale**, ignoring the presence of nearby homes dependent on private wells. I1681-2

This omission is a **substantial CEQA deficiency**. Domestic wells are far more vulnerable than municipal wells because they are typically: I1681-3

- Shallow
- Unsealed or minimally sealed
- Located close to the surface where contamination can migrate
- Directly influenced by local recharge and runoff patterns

The EIR must analyze whether BIG's construction and operations could **contaminate or dewater these wells**, but it does not. I1681-4

2. Existing Arsenic Contamination in Private Wells Elevates the Level of Concern I1681-5

Multiple community and private wells in the Sylvan Avenue Community and the neighboring community have already tested positive for **elevated arsenic levels**, a known carcinogen and toxic contaminant. This fact significantly increases the environmental and public-health risk associated with the BIG project.

Why existing arsenic contamination matters under CEQA: I1681-6

A. Wells with existing contamination have reduced "buffer capacity."

When a well already contains a toxic contaminant, **any additional pollutant load**, even small, can push concentrations above regulatory limits or worsen health risks. I1681-7

B. Hydrologic disturbance can mobilize arsenic.

Construction activities such as grading, excavation, soil compaction, and groundwater flow alteration can: I1681-8

- Mobilize naturally occurring arsenic
- Change redox conditions

Alter groundwater flow paths

Increase arsenic solubility

I1681-8 cont'd

These mechanisms are well- documented in hydrogeology, yet the EIR does not analyze them.

C. Industrial pollutants can interact with arsenic.

Rail- yard pollutants (diesel organics, solvents, metals) can change groundwater chemistry in ways that **increase arsenic mobility**. This is a foreseeable impact requiring analysis.

I1681-9

D. Residents already face a health burden.

CEQA requires agencies to consider **existing environmental conditions** when evaluating impacts. A community already exposed to arsenic is **more vulnerable**, and additional contamination—even if small—can create a **significant impact**.

I1681-10

The EIR does not acknowledge or analyze this vulnerability.

I1681-11

3. BIG Introduces New Pollutant Sources That Threaten Domestic Wells

The EIR acknowledges that BIG will generate:

Heavy metals

Hydrocarbons

Organic compounds

Industrial stormwater runoff

I1681-12

These pollutants can migrate into shallow groundwater through:

Infiltration

Flooding

Channel modifications

Soil disturbance

Accidental spills

Long- term operational leakage

I1681-13

The EIR claims impacts are “less than significant” because BMPs will be used. CEQA does **not** allow reliance on BMPs alone without substantial evidence showing they will prevent contamination of **specific receptors**, such as private wells.

I1681-14

4. BIG Reduces Local Recharge, Threatening Well Yield

The project will pave thousands of acres, reducing infiltration and altering drainage patterns. For shallow domestic wells, reduced recharge can cause: I1681-15

- Declining water levels
- Reduced pumping capacity
- Complete well failure

The EIR does not analyze **localized drawdown** or **localized recharge reduction** near the Sylvan Avenue Community. I1681-16

5. Flooding and Channel Modifications Increase Contamination Risk

BIG proposes major modifications to the **Lenwood Channel**, which flows near the Sylvan Avenue community. Flood events can: I1681-17

- Spread industrial pollutants
- Inundate wellheads
- Carry contaminants into the shallow aquifer

The EIR does not evaluate flood- related contamination pathways to domestic wells. I1681-18

6. The EIR Conflicts with SGMA and the Mojave Basin Adjudication

Under SGMA, domestic wells must be protected from: I1681-19

- Chronic lowering of groundwater levels
- Degraded water quality

Under the Mojave Basin Adjudication, existing pumpers (including private well owners) have priority rights and cannot be harmed by new pumping or hydrologic changes. I1681-20

The EIR does not analyze whether BIG's water use, drainage modifications, or pollutant load could impair existing domestic wells, violating both SGMA and adjudication requirements. I1681-21

7. CEQA Requires a Revised and Recirculated Hydrology/Water Quality Section

Because the EIR: I1681-22

- Fails to identify private wells as sensitive receptors
- Fails to analyze impacts to those private wells

Fails to address existing arsenic contaminants

Fails to evaluate pollutant migration pathways

Fails to analyze localized recharge and drawdown

Relies improperly on regulatory compliance instead of substantial evidence

I1681-22 cont'd

…the hydrology and water-quality analysis is **legally inadequate**.

A revised and recirculated EIR must be required. I1681-23

Questions for the City of Barstow or County of San Bernardino

Groundwater Protection & Domestic Wells

1. How has the City or County evaluated the BIG project's potential to contaminate or dewater private domestic wells located immediately adjacent to the project footprint, including those already showing elevated arsenic levels? I1681-24
2. What site-specific mitigation measures will the City require to ensure that shallow domestic wells are protected from industrial pollutants, altered drainage patterns, and reduced recharge? I1681-25
3. Has the City conducted a localized groundwater flow analysis to determine whether BIG's impervious surfaces and channel modifications will reduce recharge to nearby private wells? I1681-26
4. What contingency plans will the City implement if domestic wells experience contamination or loss of yield during or after construction? I1681-27
5. Will the City commit to providing municipal water hookups or emergency potable water supplies to affected residents if groundwater quality or quantity declines? I1681-28

Questions for BNSF (Project Applicant)

Industrial Stormwater, Contamination Risk & Long-Term Responsibility I1681-29

1. What specific engineering controls will BNSF implement to prevent heavy metals, hydrocarbons, solvents, and other rail-yard pollutants from migrating into shallow groundwater used by nearby residents?
2. How will BNSF monitor groundwater quality at the project boundary, and will monitoring wells be installed between the rail yard and the Sylvan Avenue community? I1681-30
3. What is BNSF's plan for addressing contamination if pollutants from BIG are detected in domestic wells, including wells already compromised by arsenic? I1681-31
4. Will BNSF commit to funding wellhead treatment, point-of-use filtration, or municipal water connections for residents if contamination occurs? I1681-32
5. How will BNSF ensure that construction activities (grading, excavation, soil compaction) do not mobilize naturally occurring arsenic or alter groundwater flow paths toward residential wells? I1681-33

Questions for the Mojave Basin Watermaster

Groundwater Rights, Adjudication Compliance & Domestic Well Protection I1681-34

1. Has the Watermaster evaluated whether BIG's water use, drainage modifications, or reduced recharge could impair existing domestic wells in the Centro Subbasin, in violation of the Mojave Basin Adjudication?
2. What protections exist for small domestic well owners if project-related hydrologic changes reduce groundwater levels or alter flow paths? I1681-35
3. Will the Watermaster require BNSF or the City to offset any loss of groundwater availability to existing pumpers, including private households? I1681-36
4. How will the Watermaster ensure that groundwater pumping associated with BIG does not exacerbate existing arsenic concentrations or mobilize contaminants? I1681-37
5. Will the Watermaster require a localized groundwater impact study specific to the Sylvan Avenue community? I1681-38

Questions for the Lahontan Regional Water Quality Control Board

Water Quality Standards, NPDES Oversight & Sensitive Receptors I1681-39

1. Has Lahontan evaluated the BIG project's potential to degrade groundwater quality in areas served by private domestic wells, which are considered sensitive receptors under state water-quality policy for the Sylvan Avenue Community residents and the Country Club Community Residents?
2. How will Lahontan ensure that industrial stormwater from the rail yard does not reach the shallow aquifer used by nearby residents, especially given existing arsenic contamination? I1681-40
3. Will Lahontan require a groundwater monitoring network, including sentinel wells between BIG and the Sylvan Avenue community? I1681-41
4. What enforcement mechanisms will Lahontan use if pollutants from BIG exceed Basin Plan water-quality objectives or impair beneficial uses such as municipal and domestic supply (MUN)? I1681-42
5. Will Lahontan require BNSF to prepare a contingency plan for providing safe drinking water to affected residents if groundwater contamination occurs? I1681-43

Please note a closing question for all agencies-What specific, enforceable measures will your agency require to guarantee that residents relying on private domestic wells will have uninterrupted access to clean, safe, and sufficient drinking water throughout construction and all operational phases of the BIG project?" I1681-44

I respectfully request that the City take into consideration the incompleteness of the draft environmental impact report. I ask that you address my concerns and questions in writing. Please consider a community-centered approach as this project consideration continues to move forward. I1681-45

Respectfully,

Sherry Baily, Sylvan Ave Community

RESPONSES TO COMMENT LETTER I1681, SHERRY BAILY

I1681-1 This comment identifies the attached comment letter. See responses below.

I1681-2 The Draft EIR evaluated BIG's impacts on the environment (including hazards and hazardous materials and hydrology and water quality) consistent with the State CEQA Guidelines Appendix G. With respect to groundwater quality, CEQA requires an analysis of whether a project would violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. By conducting an analysis on a basin-wide level, all systems drawing groundwater from the basin would be included, even domestic wells such as those at the Sylvan Avenue neighborhood. The Draft EIR evaluates BIG's impact on groundwater quality in **Draft EIR Section 5.10: Hydrology and Water Quality** starting at page 5.10-50. The Draft EIR determined that implementation of the existing regulatory framework and the protective measures required as a result would ensure that water quality standards and waste discharge requirements would be met. Further, BIG's potential to substantially decrease groundwater supplies is evaluated in **Draft EIR Section 5.10** starting at page 5.10-57. Impacts were determined to be less than significant. See also **Consolidated Response 09-07** concerning consideration of impacts to the Sylvan Community private water wells.

I1681-3 See **Response I1681-2**.

I1681-4 See **Response I1681-2**.

I1681-5 See **Consolidated Response 09-10,** concerning consideration of the Sylvan Community in the Hazardous Materials analysis, including arsenic levels/mobilization. See **Draft EIR Section 5.9: Hazards, Hazardous Materials, and Wildfire**, (page 5.9-74). A study conducted of regional background concentrations of arsenic in undifferentiated urbanized flatland soils and proposed an upper estimate for background arsenic of 11 milligrams per kilogram (mg/kg). Based on soil data collected within the hazardous materials and waste (hazardous materials and waste) study area, no exceedances of arsenic in soil were detected above 11 mg/kg. Arsenic levels in groundwater were also evaluated and were detected at four properties that exceeded the Regional Water Quality Control Board's (RWQCB) maximum contamination levels (MCL) (Draft EIR page 5.9-110). The Draft EIR discloses that construction at these properties would include soil disturbance, which could involve the release of hazardous materials into the environment. BIG would therefore implement **MM BIG HAZ-2**, which would require adherence to State RWQCB and regional CUPA guidelines for well abandonment if not used for future development or additional sampling and well-head treatment prior to any reuse associated with BIG. As a result of the necessary sampling and treatments, BIG would not contribute to the exceedance of the MCLs for arsenic and would not worsen any existing conditions through the application of required regulatory standard in **MM BIG HAZ-2**. Further, the Draft EIR found that the parcels with the highest levels of contamination would not be disturbed by BIG construction activity and therefore BIG would not have the potential to mobilize arsenic from these locations (**Draft EIR Section 5.9**, page 5.9-108).

I1681-6 See **Response I1681-5**.

I1681-7 See **Response I1681-5**.

I1681-8 See **Response I1681-5**, background naturally occurring arsenic levels within the hazardous materials and waste study area were not detected above the 11 mg/kg levels meaning that any mobilization of naturally occurring arsenic would not be at levels that would exceed the MCLs. Despite this, construction activities would include the implementation of runoff treatment devices to limit the transfer of pollutants. See **Draft EIR Section 5.10: Hydrology and Water Quality** for an analysis on construction-based impacts on groundwater quality. BIG would be required to adhere to statutory requirements, including the preparation and implementation of a stormwater pollution prevention plan which requires the implementation of best management practices (BMPs) to meet discharge requirements and would therefore not result in significant impacts.

I1681-9 See **Responses I1681-4**, **I1681-5**, and **I1681-8**.

I1681-10 Extensive soil and groundwater testing was completed by BIG to establish the environmental baseline consistent with State CEQA Guidelines § 15125. See **Draft EIR Section 5.9.4.** Potential environmental/health impacts were analyzed throughout the Draft EIR, including those on sensitive receptors. See **Responses I1681-6** and **I1681-8**.

I1681-11 See **Response I1681-10**.

I1681-12 The commentor expresses concern that BIG would result in the on-going operational use and release of hazardous materials that could migrate into shallow water. The Draft EIR discusses this potential in **Draft EIR Sections 5.9** and **5.10**. Draft EIR also identifies that regulatory compliance would minimize any potential impacts from the release of such materials, accidental spills or leaks, including compliance with the Resource Conservation and Recovery Act, Clean Air Act, Clean Water Act, the Toxic Substances Control Act, and others. Reliance on statutory requirements is permissible under CEQA. California courts have held that compliance with statutory provisions designed to mitigate the very impact addressed in the EIR can provide substantial evidence that such impacts would be less than significant .[19] In the case of BIG, it is permissible under CEQA that compliance with and adherence to the statutory requirements (all those applicable in **Draft EIR Section 5.10.2**) that specifically require the installation of BMPs to treat runoff to be below the MCLs provide substantial evidence for the determination of significance regarding water quality. Further, BIG would be required to prepare and implement Spill Prevention, Control, and Countermeasures Plans in conformance with the Clean Water Act (Title 40 CFR, Part 112). Compliance with all statutory provisions would ensure that impacts would be less that significant, including those on private wells.

I1681-13 See **Response I1681-12**.

[19] *Citizens Opposing a Dangerous Environment v. County of Kern* (2014) 228 Cal.App.4th 360 (which cites to Tracy First v. City of Tracy (2009) 177 Cal.App.4th 912)

I1681-14 See **Response I1681-12**. See also **Consolidated Response 09-07**.

I1681-15 See **Consolidated Response 09-07** concerning consideration of impacts to Sylvan Community private water wells. The analysis was conducted through review of available groundwater data from the local water district and USGS as well as professional judgement from qualified individuals in accordance with project design features and BMP implementation. Temporary (construction) and permanent (operational) BMP design was considered with regard to this analysis, see **Draft EIR Appendix 5.10 BIG-1: Hydrology and Hydraulic Design Technical Report**. Additionally, project features such as impervious and pervious surface construction and infiltration capacity of BIG's features are analyzed. Specifically, the characteristics of and the means and methods of these BMPs are considered (**Draft EIR page 5.10-24**). Further, BIG would construct infiltrating stormwater basins to capture and retain the 100-year storm events and allow stormwater and runoff from operations (e.g., washdown, maintenance, etc.) to infiltrate into the groundwater such that a significant portion of the BIG footprint would not be removed from the possible areas of groundwater recharge (**Draft EIR page 5.10-59**). Regarding reducing infiltration and altering drainage patterns, the **Draft EIR** determined that BIG would result in less than significant impacts as overall flow patterns would largely remain the same and BIG would construct infiltration basins to infiltrate the 100-year storm event.

I1681-16 CEQA does not require a site-specific well drawdown analysis. **Draft EIR Section 5.10: Hydrology and Water Quality**, specifically **Draft EIR Impact 5.10-2** (pages 5.10-57 through 5.10-59), analyzes impacts on groundwater recharge and it was determined that impacts would be less than significant.

I1681-17 The risk of release of pollutants due to flooding and project inundation is discussed in **Draft EIR Section 5.10**, specifically **Draft EIR Impact 5.10-7** (pages 5.10-76 and 5.10-77). However, the commenter asserts that the modifications to Lenwood Channel would cause new flooding. As noted in **Consolidated Response 04-01** concerning the scope of CEQA, commenters are advised to support assertions that the lead agency should conduct additional analysis or review with data or other factual references. This is because the lead agency's CEQA conclusion must be based on substantial evidence in the record and not speculation. Here, the commenter has not pointed to any facts or data that support its contention that the DEIR's analysis is flawed. Nonetheless, in addressing commenters' concerns, the improvements to Lenwood Channel would increase flood control capacity and reduce the risk of flooding when compared to existing conditions; see **Draft EIR Section 5.10** (page 5.10-64).

1681-18 **Draft EIR Impact 5.10-7** (pages 5.10-76 through 5.10-78) analyzes the risk of release of pollutants due to project inundation and was determined to be less than significant as BIG would design and construct all structures to be above the FEMA floodplain and dam inundation areas limited the ability for BIG to be flooded. Further, any flooding would be directed to on-site BMPs which would detain or treat surface water flows.

I1681-19 BIG's water use, compliance with the Sustainable Groundwater Management Act (SGMA), and compliance with the Mojave Basin adjudication are addressed in **Draft EIR Section 5.17:**

Utilities and Service Systems. BIG's impact on drainages, water quality, and further compliance with the SGMA is addressed in **Draft EIR Section 5.10**.

I1681-20 See **Response I1681-19**.

I1681-21 See **Response I1681-19**.

I1681-22 See **Responses I1681-1** through **I1681-19**. The Draft EIR's analysis on hydrology and water quality is adequate and the **Draft EIR** need not be revised or recirculated. See **Consolidated Response 03** concerning recirculation of the **Draft EIR**, and **Consolidated Response 04** concerning general non-CEQA issues.

I1681-23 See **Responses I1681-22**, above, **Consolidated Response 03** concerning recirculation of the **Draft EIR**, and **Consolidated Response 04** concerning general non-CEQA issues.

I1681-24 See **Draft EIR Section 5.10** for an analysis of BIG's potential to violate surface and groundwater quality standards.

I1681-25 BIG is required to comply with the requirements of the Industrial General Permit; see **Draft EIR Section 5.10** for a list of potential site-specific BMPs that would be implemented.

I1681-26 See **Draft EIR Section 5.10** for an analysis on BIG's potential to reduce groundwater recharge.

I1681-27 See **Consolidated Response 04** concerning general non-CEQA issues.

I1681-28 See **Consolidated Response 04** concerning general non-CEQA issues.

I1681-29 BIG would be required to comply with the provisions of various local, state, and federal laws, rules, and ordinances that govern pollutant discharges. See **Draft EIR Section 5.10** for an analysis on BIG's potential to violate surface and groundwater quality standards.

I1681-30 BIG would comply with all relevant laws, rules, and ordinances and would install infrastructure as required by these regulatory provisions.

I1681-31 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 09-07** concerning consideration of impacts to Sylvan Community private water wells, and **Consolidated Response 09-10** concerning consideration of the Sylvan Community in the Hazardous Materials analysis, including arsenic levels/mobilization.

I1681-32 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 09-07** concerning consideration of impacts to Sylvan Community private water wells.

I1681-33 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 09-10** concerning consideration of the Sylvan Community in the Hazardous Materials analysis, including arsenic

levels/mobilization, and **Consolidated Response 05** concerning feasible and enforceable mitigation. See **Draft EIR Section 5.10** for an analysis on BIG's potential to alter drainage patterns.

I1681-34 through I1681-38 See **Consolidated Response 06-01** concerning the geographic scope of the environmental analysis and definition of study area, **Consolidated Response 09-04** concerning consideration of the Sylvan Community in the Hydrology and Water Quality analyses, and **Consolidated Response 09-07** concerning consideration of impacts to Sylvan Community private water wells.

I1681-39 through I1681-43 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and regulatory compliance, **Consolidated Response 09-04** concerning consideration of the Sylvan Community in the Hydrology and Water Quality analyses, and **Consolidated Response 09-07** concerning consideration of impacts to Sylvan Community private water wells.

I1681-44 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 09-04** concerning consideration of the Sylvan Community in the Hydrology and Water Quality analyses, and **Consolidated Response 09-07** concerning consideration of impacts to Sylvan Community private water wells.

I1681-45 See **Consolidated Response 01** concerning community outreach and the Draft EIR public review period, **Consolidated Response 03** concerning recirculation of the Draft EIR, and **Consolidated Response 06** concerning potential effects on communities.

COMMENT LETTER I1682

January 7, 2026

5.10 HYDROLOGY, WATER QUALITY, ENVIRONMENTAL JUSTICE, AND PRIVATE WELL VULNERABILITY

I1682-1

Supplemental Comment #1, due to additional discovery

Submitted by: Sherry, Resident Adjacent to the BIG Project Site

Subject: Deficiencies in Draft EIR – Hydrology, Water Quality, Cumulative Impacts, and Environmental Justice

I submit this comment for public record as a long-time resident who lives directly adjacent to the proposed Barstow International Gateway (BIG) project site. I am not a technical expert or environmental professional. I am a private citizen doing my due diligence to understand the project, the City's financial needs, and the implications for my home and health. I recognize that BNSF staff are human beings doing their jobs, and I do not believe anyone intends harm. Their focus is freight movement and economic efficiency. My focus is simply protecting my health, my home, and my water.

I1682-2

I rely on a private domestic well for all household water. My well has documented arsenic contamination confirmed through laboratory testing. I have also undergone a heavy metals and minerals analysis that shows arsenic present in my own body. I live with autoimmune and skin-integrity conditions that make me more vulnerable to environmental exposures. I am not making medical claims; I am describing my lived experience and the reality of my vulnerability.

I1682-3

The Draft EIR does not analyze or acknowledge the risks faced by private well owners like me. This omission is a significant CEQA deficiency.

I1682-4

1. CEQA Requires Disclosure of All Affected Water Users

CEQA Guidelines §15125(a) requires an EIR to describe the environmental setting, including existing physical conditions, as the baseline for impact analysis. **CEQA Guidelines §15126.2(a)** requires analysis of direct and indirect environmental effects on all affected receptors. **CEQA Guidelines §15151** requires an EIR to provide sufficient detail for meaningful public review.

I1682-5

The EIR discusses municipal and mutual water systems but **excludes private well owners**, even though:

- My well contains arsenic above safe levels
- I live immediately adjacent to the project footprint
- Two of the region's groundwater recharge sites are located within the BIG footprint

I1682-6

Private wells are the most vulnerable receptors because they lack regulatory oversight, monitoring, and alternative water supplies

I1682-6 cont'd

QUESTION: Doesn't this omission prevent informed public review and violates CEQA's informational requirements?

I1682-7

2. Unequal Treatment of Residents – Environmental Justice Concerns

Nearby small water systems, such as the Hi Desert Mutual Water Company, are currently pursuing **State- funded consolidation** with Golden State Water due to water quality and reliability concerns. This process is documented through a formal board resolution and State Water Resources Control Board involvement.

I1682-8

Private well owners, however, are offered:

No protections

No mitigation

No analysis

No alternative water supply

No monitoring

I1682-9

QUESTION: Doesn't this creates a disparate impact?

Public Resources Code §21083.05 requires CEQA to consider whether a project causes or contributes to environmental burdens on disadvantaged or vulnerable communities. **CEQA Guidelines §15131** requires analysis of social and economic effects when they contribute to physical environmental impacts. **CEQA Guidelines §15126.2(d)** requires analysis of environmental justice implications when relevant.

The EIR does not analyze whether offering protections to some residents while excluding others creates disproportionate burdens.

I1682-10

QUESTION: Isn't this is a significant omission?

3. Chemical Exposure Pathways Not Analyzed

a. Pesticides and Herbicides

The project will require ongoing vegetation management and industrial operations that typically involve chemical use. **CEQA Guidelines §15126.2(a)** requires analysis of reasonably foreseeable chemical exposure pathways. The EIR does not evaluate how pesticides and herbicides may infiltrate groundwater or accumulate in recharge zones.

I1682-11

b. Brake Dust and Industrial Particulates

I1682-12

Rail yards generate brake dust containing copper, zinc, and other toxic metals. These particulates settle on soil and are mobilized by stormwater. The EIR does not analyze deposition, infiltration, or groundwater migration of these contaminants. I1682-13

c. Bioaccumulation and BMP Limitations

The EIR states that BMPs will address bioaccumulation. However, BMPs are designed for **surface runoff**, not groundwater protection. They do not prevent contaminants from entering recharge basins or migrating toward private wells. I1682-14

d. Arsenic Mobilization

Construction, grading, and hydrologic changes can mobilize naturally occurring arsenic. **CEQA Guidelines §15144** requires an EIR to make a good- faith effort at full disclosure, even when information is uncertain. The EIR does not analyze whether project activities could increase arsenic concentrations or accelerate plume movement. I1682-15

4. Groundwater Recharge Sites Within the Project Footprint

The Draft EIR acknowledges that **two of the four regional groundwater recharge sites are located within the BIG footprint**. Recharge areas are highly vulnerable because they allow water—and contaminants—to percolate directly into the aquifer. I1682-16

CEQA Guidelines §15126.2(a) requires analysis of impacts to groundwater quality and supply. The EIR does not evaluate how pesticides, herbicides, hydrocarbons, heavy metals, or brake dust could enter these recharge zones and migrate toward private wells.

5. Cumulative Impacts – Required Under CEQA

CEQA Guidelines §15130 requires an EIR to analyze cumulative impacts when a project's incremental effects are cumulatively considerable.

The EIR does not analyze cumulative impacts related to: I1682-17

- Existing arsenic contamination in private wells
- Regional groundwater quality impairments
- State- funded consolidation of nearby water systems due to water quality concerns
- Industrial chemical use
- Brake dust deposition
- Recharge basin vulnerability
- Long- term hydrologic changes from the BIG project

QUESTION: Isn't the omission of private well owners from the cumulative impacts analysis is a CEQA violation? I1682-18

6. Requested Actions

For these reasons, I respectfully request that the City of Barstow to respond in writing to my above questions and concerns, as well as:

Revise and recirculate the Hydrology and Water Quality section to include private well owners as an affected population.

Analyze pesticide, herbicide, brake- dust, and industrial particulate pathways and their potential to infiltrate groundwater and recharge zones.

Evaluate arsenic mobilization and exposure risks, including impacts associated with construction, dewatering, stormwater infiltration, and long- term hydrologic changes. I1682-19

Assess environmental justice implications of offering protections to some residents while excluding others.

Identify and require mitigation measures that ensure safe, reliable water for all residents adjacent to the project, including private well owners.

Provide a clear explanation of how groundwater- dependent households will be protected during and after project buildout.

I am not asking for special treatment. I am asking for equal protection, transparency, and a complete environmental analysis that recognizes the real conditions on the ground and the real people who live here. I am doing my best to remain neutral, fair, and focused. I respect the City's financial needs and the human beings working on this project. I simply ask that my health and safety be given the same consideration as any other resident. I1682-20

In Trust,

Sherry Baily

Sylvan Ave Community

RESPONSES TO COMMENT LETTER I1682, SHERRY BAILY

I1682-1 This comment identifies the attached comment letter. See responses below.

I1682-2 See **Consolidated Response 04** concerning general non-CEQA issues.

I1682-3 See **Consolidated Response 04** concerning general non-CEQA issues.

I1682-4 As noted in State CEQA Guidelines Appendix G, CEQA does not specifically require an analysis or acknowledgement of risks of private well owners, however, CEQA does require a comprehensive analysis of a project's potential to cause impacts to groundwater quality. The Draft EIR analyzes the potential impacts of BIG in accordance with State CEQA Guidelines Appendix G in **Draft EIR Section 5.10: Hydrology and Water Quality.**

I1682-5 Comment noted. The Draft EIR is consistent with State CEQA Guidelines §§ 15125, 15126.2, and 15151. The comment does not otherwise address the adequacy of the environmental document and will be provided to decision makers for consideration. See **Consolidated Response 04** concerning general non-CEQA issues.

I1682-6 See **Response I1682-4**. Additionally, see **Responses I1681-1** through **I1681-27**.

I1682-7 See **Response I1682-4**. Further, State CEQA Guidelines § 15151 does not require an exhaustive analysis of environmental effects of a proposed project but for adequacy, completeness, and a good faith effort at full disclosure, which was provided. The Draft EIR establishes an environmental baseline through the discussions provided within all "Environmental Setting" subheadings of each chapter. With respect to hydrology and water quality, analysis was focused on discharges from the BIG footprint, which would eventually infiltrate into the groundwater aquifers underlying residential properties. By focusing on these discharges and BIG's potential to cause discharge violations (which was determined to be less than significant) it was determined that BIG would not decrease the water quality of groundwater sources. As such, impacts to domestic private wells would similarly be less than significant.

I1682-8 See **Response I1682-4.**

I1682-9 See **Response I1682-4**.

I1682-10 Public Resources Code (PRC) § 21083.05 states:

> "The Office of Planning and Research and the Natural Resources Agency shall periodically update the guidelines for the mitigation of greenhouse gas emissions or the effects of greenhouse gas emissions as required by this division, including, but not limited to, effects associated with transportation or energy consumption, to incorporate new information or criteria established by the State Air Resources Board pursuant to Division 25.5 (commencing with Section 38500) of the Health and Safety Code."

PRC § 21083.05 does not address environmental burdens on disadvantaged or vulnerable communities. State CEQA Guidelines § 15131 does not require the analysis of social and economic effects within an EIR, rather social and economic effects "may be used to determine the significance of physical changes caused by the project." State CEQA Guidelines § 15126.2(d) does not require analysis of environmental justice implications, rather it requires an analysis of significant irreversible environmental changes and are addressed in **Draft EIR Section 7.0: Other CEQA Considerations**. The Draft EIR complies with the State CEQA Guidelines, is adequate, and need not be recirculated.

I1682-11 The Draft EIR complies with State CEQA Guidelines § 15126.2(a) through the environmental analyses contained within **Draft EIR Sections 5.1** through **5.17**. For discussions regarding operational uses of hazardous materials, see **Draft EIR Section 5.9: Hazards, Hazardous Materials, and Wildfire** (page 5.9-69 and 5.9-73). For discussion regarding groundwater infiltration and recharge, see **Draft EIR Section 5.10: Hydrology and Water Quality**. Further, see **Consolidated Response 09-07** concerning consideration of impacts to Sylvan Community private water wells.

I1682-12 Brake dust and industrial particulates are specifically addressed in **Draft EIR Impact 5.10-1** (pages 5.10-50 through 5.10-56). Further, BIG would be required to comply with the requirements of the Industrial General Permit (IGP) which regulates industrial stormwater discharges. See **Response I1681-14**.

I1682-13 See **Response I1682-12**.

I1682-14 BIG would be required to comply with the IGP which regulates industrial stormwater discharges. One such requirement is the treatment of surface water runoff with best management practices (BMPs) prior to infiltration (**Draft EIR Section 5.10**, page 5.10-55).

I1682-15 State CEQA Guidelines § 15144 does not concern good-faith efforts for full disclosure but rather discusses forecasting of future conditions. See **Draft EIR Section 5.9** for a discussion and analysis on arsenic and known contamination. Also see **Consolidated Response 09-10** concerning consideration of the Sylvan Community in the Hazardous Materials analysis, including arsenic levels/mobilization and **Response I1681-5**.

I1682-16 See **Response I1682-11**. As discussed in **Draft EIR Section 5.10**, pursuant to the requirements of the Industrial General Permit (IGP), surface water must be treated prior to infiltration and discharge from BIG. As such, BIG would not direct water for infiltration that would exceed the maximum contamination levels allowed by the IGP and RWQCB.

I1682-17 Pursuant to State CEQA Guidelines § 15130, the discussion of cumulative impacts was based on a list of past, present, and probable future projects producing related or cumulative impacts. See **Consolidated Response 09-06** concerning consideration of cumulative impacts to the Sylvan Community. State CEQA Guidelines § 15151 does not require a cumulative hydrology analysis to model every conceivable contamination pathway or site-specific condition, but rather to evaluate BIG's incremental contribution to broader groundwater and water quality conditions. **Draft EIR Section 6.0** satisfies this standard by addressing

cumulative effects at the basin and drainage scale and relying on established regulatory frameworks and impact thresholds.

I1682-18 See **Response I1682-17**.

I1682-19 See **Responses I1682-1** through **I1682-17,** and **Consolidated Response 03** concerning recirculation of the Draft EIR.

I1682-20 See **Consolidated Response 04** concerning general non-CEQA issues..

COMMENT LETTER I1683

I1683

January 2, 2026 5.12 Noise and Vibration dEIR Response

To the City of Barstow and BNSF Railway:

My name is Sherry Baily, and I live **directly adjacent to the proposed Barstow International Gateway (BIG) project site**. I am submitting this comment because the Noise and Vibration section of the Environmental Impact Report (EIR) makes it clear that this project will fundamentally and permanently alter the health and safety of the people who already live here. I1683-1

The EIR states that both **construction noise** and **long-term operational noise** from BIG will result in **significant and unavoidable impacts** on nearby residents. This is not a minor inconvenience. This is a direct admission that the project will expose residents to noise levels **above what the State of California considers safe for human health**. I1683-2

The report acknowledges that construction of the electrical transmission line will generate noise levels so high that even with mitigation, the impacts remain significant. It also states that nighttime construction may occur because temporary noise barriers are infeasible. For those of us living immediately adjacent to the project, this means we may be subjected to **sleep-disrupting, stress-inducing noise at all hours**, with no meaningful protection. I1683-3

The EIR further states that **operational noise from BIG will exceed both exterior and interior noise standards** at sensitive receptors, including homes like mine. These standards exist for a reason: chronic exposure to elevated noise levels is associated with increased stress, cardiovascular strain, sleep disturbance, impaired concentration, and reduced overall well-being. I1683-4

Relevant Health Research

The health risks of chronic noise exposure are well-documented:

- The **World Health Organization (WHO)** has found that long-term exposure to environmental noise above 55 dBA Ldn is associated with increased risk of **hypertension, heart disease, and sleep disturbance**.
- A study published in the journal **Environmental Health Perspectives** found that chronic noise exposure is linked to **elevated stress hormones**, which contribute to cardiovascular disease.
- Research from the **American Heart Association** has shown that nighttime noise exposure disrupts sleep cycles and increases the risk of **stroke and heart attack**.
- The **U.S. EPA** has long recognized that noise above 45 dBA indoors interferes with sleep and above 55 dBA outdoors causes significant annoyance and stress.

I1683-5

These findings directly relate to the EIR's admission that BIG will expose residents to noise levels **above 60–65 dBA CNEL**, which exceeds thresholds associated with documented health impacts. I1683-6

Personal Vulnerability

I also want to emphasize how this affects me personally. I live in an ~ **3,000 sq ft, with 2 marriage lines connecting a triple wide modular home**, which provides **less exterior- to- interior noise insulation** than a traditional on site- built home. Modular homes typically have lighter wall assemblies, thinner exterior materials, and more surface area exposed to noise. This places me at heightened risk for **sleep disruption, chronic stress, and long-term health impacts**. I1683-7

Under CEQA, an EIR must:

1. Disclose significant impacts clearly and accurately.

The EIR acknowledges significant and unavoidable noise impacts, but it does not fully analyze: I1683-8

- The health consequences of chronic noise exposure.
- The disproportionate impact on residents in modular homes or older housing stock.
- The cumulative effect of construction + operational noise over decades.

2. Consider feasible mitigation measures.

CEQA requires agencies to adopt feasible mitigation unless truly infeasible. The EIR dismisses nighttime construction mitigation as "infeasible" without providing: I1683-9

- Cost analysis
- Alternative construction methods
- Phasing options
- Temporary relocation options

This may not meet CEQA's requirement for **substantial evidence**.

3. Evaluate alternatives that reduce impacts.

CEQA requires consideration of alternatives that could reduce noise impacts. The EIR does not appear to evaluate: I1683-10

- Alternative alignments
- Alternative yard configurations
- Buffer zones
- Relocation of the electrical transmission line
- Operational restrictions

4. Provide enforceable mitigation and monitoring. I1683-11

CEQA requires a **Mitigation Monitoring and Reporting Program (MMRP)**. The EIR does not specify: I1683-11 cont'd

- How noise will be monitored
- Who will enforce compliance
- What happens if noise exceeds predictions
- Whether residents will have recourse

5. Protect human health and welfare. I1683-12

CEQA's core purpose is to prevent environmental harm. Allowing a project to knowingly expose residents to noise levels above state standards—without mitigation—raises serious compliance concerns.

City of Barstow:

1. How will you protect the health of residents who will be exposed to noise levels above legal standards? I1683-13

What specific health- protective measures will be implemented?

2. What recourse will residents have when noise levels exceed what is predicted in the EIR? I1683-14

Will there be independent monitoring, enforcement mechanisms, or a transparent complaint process?

3. Why is nighttime construction being considered when the EIR acknowledges it will cause significant and unavoidable impacts? I1683-15

What alternatives were evaluated, and where is the substantial evidence supporting infeasibility?

4. What commitments will BNSF make to ongoing noise monitoring once the project is operational? I1683-16

Will monitoring be continuous, publicly accessible, and independently verified?

5. How will the City ensure that BNSF remains accountable for meeting noise mitigation requirements? I1683-17

What enforcement tools does the City have, and will they be used?

6. What protections or accommodations will be offered to residents whose homes become incompatible with acceptable noise standards? I1683-18

Will relocation assistance, soundproofing, or other compensatory measures be provided?

7. How will the City and BNSF ensure transparency with the community moving forward?

I1683-19

Will there be regular public updates, community meetings, or a dedicated liaison for affected residents?

I am not opposed to economic development, but **I am deeply concerned that this project, as currently designed, places an unacceptable and unmitigated health burden on the people who already live here**. The EIR acknowledges that the noise impacts are significant, unavoidable, and **beyond what is considered safe for residential areas**. That reality deserves honest answers, meaningful protections, and a commitment to transparency.

I1683-20

I respectfully request that the City of Barstow and BNSF respond to these questions in writing and commit to a community- centered process as this project consideration moves forward.

I1683-21

Thank you for your time and consideration.

Sherry Baily

Sylvan Ave Community

RESPONSES TO COMMENT LETTER I1683, SHERRY BAILY

I1683-1 This comment is introductory to the specific comments provided below. See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community, and **Consolidated Response 04** concerning general non-CEQA issues.

I1683-2 See **Consolidated Response 02** concerning significant and unavoidable impacts and the Statement of Overriding Considerations, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community.

I1683-3 **Draft EIR Section 5.12: Noise and Vibration** concluded that construction could result in exceedance of the FTA's 70 dBA threshold for nighttime construction noise. As such, BIG would implement **MM BIG NOI-1**, which requires preparation of a Nighttime Construction Noise Logistics Plan. While incorporation of **MM BIG NOI-1** would reduce nighttime construction noise levels to the extent feasible, the precise details regarding the proposed schedule, duration/hours, which nights nighttime construction would be required, equipment type/quantity, and specific location of construction for nighttime construction activities are unknown, and to be determined before construction commences. As such, the nighttime construction activities could result in a significant and unavoidable impact despite incorporation of **MM BIG NOI-1**. Additionally, the City of Barstow as the Lead Agency would be required to review and approve the Nighttime Construction Noise Logistics Plan to ensure the proper measures are being taken to reduce significant noise impacts on nearby sensitive receptors. Also see **Response O21-70** and revisions to **MM BIG NOI-1,** discussed therein and shown in **Final EIR Section 3.0: Errata to the Draft EIR**, which specify definite mitigation performance standards. Further, BIG would implement **MM BIG NOI-2**, which would include the construction of noise barriers to mitigate noise impacts. Lastly, the **Draft EIR Appendix 5.12: BIG-1 Noise and Vibration Technical Report** includes the **Noise Barrier Financial Feasibility Analysis – On-Site Facility Noise**, which evaluated reasonable and feasible mitigation to construction noise barriers to reduce noise impacts. As discussed in the **Noise Barrier Financial Feasibility Analysis**, the basis for the analysis included the cost per benefited receptor as provided in the Caltrans Noise Analysis Protocol methodology for financial feasibility, which was $146,000 per benefited receptor at the time the Draft EIR was prepared. Conservatively, the financial feasibility analysis designated a benefited receptor to be any receptor that experiences a noise reduction of 1BA or more as a result of the recommended noise abatement. The Draft EIR originally evaluated five noise barrier options, and determined that only three (BAR-2, BAR-3, and BAR-5) were financially feasible, as shown in **Draft EIR Appendix 5.12 BIG-1: Noise and Vibration Technical Report, Table 47: Noise Barrier Reasonable Cost Allowance**. However, BAR-2 has been removed from MM NOI-2 as described in the Final EIR and MMRP, given that it was initially proposed for the sole and exclusive purpose of abating noise from the Battery Energy Storage System (BESS), which BIG does not now propose. See **Consolidated Response 16** concerning BESS and **Final EIR Section 3.0: Errata to the Draft EIR** for proposed edits to the Draft EIR text concerning the BESS. Therefore,

only two noise barriers (BAR-3 and BAR-5) remain as financially feasible means of mitigating potentially significant noise impacts of BIG, and **Mitigation Measure MM BIG NOI-2: Noise Barriers** has been updated accordingly, as shown in **Final EIR Section 3.0: Errata to the Draft EIR**. As such, the EIR evaluated and proposed to implement all feasible mitigation to reduce potential noise impacts. See **Response O21-74** and **Response O21-75** concerning additional suggested mitigation for BIG noise impacts. Also see **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 02** concerning significant and unavoidable impacts and the Statement of Overriding Considerations, **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community, and **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses.

I1683-4 **Draft EIR Section 5.12: Noise** included an evaluation of the potential human responses to the noise impacts resulting from BIG operations. Specifically, the **Draft EIR Appendix 5.12 BIG-1: Noise and Vibration Technical Report** conducted a sleep disturbance analysis that would result from BIG operations. As acknowledged in **Draft EIR Appendix 5.12 BIG-1** (page 25), no specific adverse health effects have been clearly associated with sleep disturbance, characterized by awakening or by sleep-state changes, but was included in the analysis because sleep disturbance is deemed undesirable and may be considered an effect caused by noise exposure. As shown in **Draft EIR Appendix 5.12 BIG-1 Table 59: BIG Operational Interior Noise Levels – Sleep Disturbance and Speech Interference Analysis** (page 140), it was concluded that operational noise impacts would not result in significant impacts to sleep disturbance. Further, **Draft EIR Section 5.12** describes that the noise analysis was based on conservative conditions for operational noise levels, where it is assumed that individual noise sources during operations are occurring simultaneously to provide a worst-case scenario at nearby receptors. As such, the noise levels associated with BIG operations constitute the maximum noise levels that could occur at a point in time. Additionally, the receptor locations that were chosen are representative of the receptors that have the potential to be most impacted by noise and vibration resulting from BIG construction and operations. Lastly, BIG would incorporate **MM BIG NOI-1** and **MM BIG NOI-2**, as shown in **Final EIR Section 3.0: Errata to the Draft EIR,** which would include a Nighttime Construction Noise Logistics Plan and construction of two noise barriers to mitigate operational noise impacts, respectively. Also see **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community, **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses, and **Consolidated Response 05** concerning feasible and enforceable mitigation.

I1683-5 See **Response I1683-4** and **Response O21-68** concerning potential human response to BIG noise impacts, **Consolidated Response 04** concerning general non-CEQA issues, and **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses.

I1683-6 As discussed in **Draft EIR Appendix 5.12 BIG-1: Noise and Vibration Technical Report** (page 62), the methodology for determining the significance of BIG's noise impacts is comparing BIG noise levels to the standards established in the local general plan and noise ordinances, as described in the Municipal Codes of the County and City. Additionally, the EIR determined the significance of BIG's noise impacts by comparing BIG noise levels to the noise levels under no project conditions. As concluded in **Draft EIR Impact 5.12-1** (pages 5.12-74 through 5.12-129), BIG's construction and operational noise levels would exceed the City and County noise level thresholds, and therefore a significant and unavoidable impact would occur. Also see **Consolidated Response 02** concerning significant and unavoidable impacts and the Statement of Overriding Considerations and **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses. See **Response I1683-4** concerning BIG impacts on human response to noise.

I1683-7 See **Response I1683-4** and **Response O21-68** concerning project impacts on human response to noise. See also **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses.

I1683-8 See **Response I1683-4** and **Response O21-68** concerning health consequences of chronic noise exposure and the interior noise analysis.

Cumulative noise impacts. The cumulative effect of BIG construction and operational noise was included in **Draft EIR Appendix 5.12 BIG-1: Noise and Vibration Technical Report** (page 51). Specifically, the operational noise levels were analyzed using the FTA guidelines, by quantifying and evaluating BIG-generated nose levels against FTA's sliding scale noise standards that are based on measures existing ambient noise levels at nearby sensitive receptors. The FTA methodology does not account for potential change in future baseline noise levels at sensitive receptors. Train activity along the existing mainlines in BIG's vicinity are anticipated to increase approximately 1.0-2.5 percent annually, without BIG. Accordingly, future baseline train noise levels at sensitive receptors would also increase. In accordance with State CEQA Guidelines § 15125, the operational train noise modeling was completed for future years without BIG to establish future baseline train noise conditions and analyze incremental noise increase impacts directly attributable to BIG at nearby sensitive receptors. Further, **Draft EIR Appendix 5.12 BIG-1: Noise and Vibration Technical Report** (**page 141**) includes an analysis of BIG's cumulative noise impacts from opening year (2028) to horizon year (2048), which constitutes an assessment of noise levels over a 20-year period. As such, the cumulative impacts of construction and operational noise over two decades have been evaluated in the Draft EIR. See **Consolidated Response 09-06** concerning consideration of cumulative impacts to the Sylvan Community.

I1683-9 See **Response I1683-3** concerning feasible mitigation, **Response O21-74** and **Response O21-75** concerning additional suggested mitigation measures, **Response I1683-10** concerning alternatives evaluated in the Draft EIR, and **Consolidated Response 05** concerning feasible and enforceable mitigation.

I1683-10 **Section 8.0 Alternatives** evaluates several alternatives to the proposed Project and compares impacts of each alternative to the Project's impacts. The Draft EIR evaluated this range of reasonable alternatives that would feasibly attain most of the basic Project objectives and avoid or substantially lessen any significant Project effects. (State CEQA Guidelines § 15126.6(a).) According to State CEQA Guidelines § 15126.6(e)(2): No Project Alternative, "if the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. As discussed in **Draft EIR Section 8.0: Alternatives** (page 8-115), the West Transload Warehouse Center Alternative is the environmentally superior alternative to BIG. With respect to noise, all alternatives, except for the No BIG/No Annexation Alternative, would result in significant and unavoidable noise impacts.

Additionally, there were six alternatives to BIG that were considered, but rejected because they were either infeasible, unable to meet most of BIG's basic project objectives/would not avoid significant environmental impacts. Specifically, as discussed on Draft EIR pages 8-39 through 8-44, the Draft EIR considered the BIG Flipped Concept Alternative and the Reduced BIG Flipped Concept Alternative to locate warehouse operations between the rail yard and Main Street to increase the distance of the rail yard operations from sensitive receptors. Ultimately, these alternatives were rejected because they would fail to meet most of BIG's objectives. Therefore, a range of reasonable alternatives to BIG were considered. See **Consolidated Response 09-11** concerning consideration of alternatives to minimize impacts to the Sylvan Community.

I1683-11 State CEQA Guidelines § 15097 and Public Resources Code § 21081.6 require adoption of a Mitigation Monitoring and Reporting Program (MMRP) to ensure implementation of mitigation measures identified to mitigate significant environmental impacts. The MMRP (found in **Final EIR Section 4.0: Mitigation Monitoring and Reporting Program**) for the Project would include all mitigation measures as proposed in the Draft EIR. The MMRP would include the timing of implementation, monitoring and reporting methods, designation of responsible monitor and verification of completion. The City, as the Lead Agency, would be responsible for enforcing compliance with the MMRP. See **Consolidated Response 05** concerning feasible and enforceable mitigation.

I1683-12 See **Response I1683-3** concerning the proposed mitigation measures and **Response I1683-11** concerning enforcement of the MMRP. See also **Consolidated Response 05** concerning feasible and enforceable mitigation.

I1683-13 See **Response I1683-4** concerning human response to noise and the proposed mitigation measures. See also **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses.

I1683-14 See **Response I1683-11** concerning enforcement of the MMRP. See also **Consolidated Response 05** concerning feasible and enforceable mitigation.

I1683-15 See **Response I1683-3** concerning the proposed mitigation measures for BIG's construction-related noise impacts and **Response I1683-10** concerning the alternatives to BIG. See also **Response L20-3** and **Response O21-70** concerning proposed mitigation for BIG nighttime construction noise impacts. See also **Consolidated Response 09-11** concerning consideration of alternatives to minimize impacts to the Sylvan Community.

I1683-16 As discussed in **Draft EIR Impact 5.12-1** (pages 5.12-74 through 5.12-129), BIG's operational noise levels would be significant and unavoidable, despite the implementation of mitigation measure **MM NOI-2**, which would require the installation of noise barriers to reduce noise levels. Additionally, **MM NOI-2** would be included in the MMRP, and the City would ensure that BIG adheres to construction of the noise barriers. However, no other feasible mitigation measures were identified to reduce operational noise levels at sensitive receptors. See **Consolidated Response 02** concerning significant and unavoidable impacts and the Statement of Overriding Considerations, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses. See **Response I1683-11** concerning enforcement of the MMRP.

I1683-17 See **Response I1683-11** concerning enforcement of the MMRP and **Consolidated Response 05** concerning feasible and enforceable mitigation.

I1683-18 See **Response I1683-3** concerning the financially feasible mitigation analysis and **Consolidated Response 05** concerning feasible and enforceable mitigation.

I1683-19 See **Consolidated Response 01** concerning community outreach and the Draft EIR public review period and **Consolidated Response 04** concerning general non-CEQA issues.

I1683-20 See **Response I1683-3** concerning the proposed mitigation measures and see **Response I1683-11** concerning enforcement of the MMRP. See also **Consolidated Response 02** concerning significant and unavoidable impacts and the Statement of Overriding Considerations.

I1683-21 See **Consolidated Response 01** concerning community outreach and the Draft EIR public review period and **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER I1684

I1684

January 2, 2026 5.12 Noise and Vibration dEIR Response

Supplemental comment to 5.12 (#1)

To the City of Barstow, Planners, BNSF Railway:

Once again, this is Sherry Baily, submitting my public response as a supplemental comment to my initial response submitted, regarding 5.12 Noise and Vibration. I1684-1

Please note common deficiencies in rail-industrial dEIRs for Noise and Vibration:

- Using CNEL or Ldn averages that hide nighttime peak noise
- Fail to analyze low-frequency, to include rail rumble
- Fail to analyze groundborne vibration
- Ignore structural vulnerability of modular homes (many of the Sylvan Ave community will be impacted).
- Use inappropriate threshholds
- Fail to analyze sleep disturbance, a CEQA requirement - especially as we are a community directly impacted, individual parcel studies should be assessed.
- Claiming significant and unavoidable impacts, without evidence that supports alternatives or unfeasible mitigations.

I1684-2

The dEIR did not model my parcel.

Question: Isn't that considered a fatal flaw of the dEIR? I1684-3

The Sylvan Ave Community is a sensitive receptor and we request this dEIR to provide parcel-specific analysis as our lands and health are directly impacted. I1684-4

Please Note: On Map Figure 5.12-12, there is a modeled Sensitive Receptor #3 indicated.

Question: Why is #3 omitted from Tables 5.12 (29, 30, 31, 32, 33, 34, 35, 36) from its reporting analysis, which is the entrance of the Sylvan Ave Community? Or omitted from consideration throughout Section regarding 5.12, Noise and Vibration? I1684-5

Question: Why is #2 and #3 omitted from from Table 5.12 (37, 38, 39) as consideration of the Horizon Years? I1684-6

My home is located within the area the EIR identifies as experiencing the **highest operational noise increases** (e.g., Receptors 1-4), with modeled increases of under Opening Year 2028, Interim 2033, and Horizon 2048 conditions. I1684-7

The EIR repeatedly acknowledges that:

> **Noise impacts are significant and unavoidable** for both construction and operational years.
>
> **No feasible mitigation exists** for many receptors.

I1684-8

Question: Would this dEIR fail to comply with CEQA because it:

1. **Understates health impacts**, ignoring FRA, EPA, and WHO research.
2. **Fails to analyze disproportionate impacts on existing residents**.
3. **Fails to consider feasible mitigation**, including operational restrictions, quiet zones, and alternative site layouts.
4. **Improperly dismisses feasible barriers as "financially infeasible."**
5. **Fails to disclose cumulative health risks**, including sleep disturbance, cardiovascular harm, and chronic stress.

I1684-9

Question: Doesn't this provide the evidence and legal basis for requiring a revised and recirculated Noise & Vibration section?

I1684-10

The EIR Fails to Disclose or Analyze Well-Established Health Impacts of Transportation Noise

I1684-11

CEQA requires disclosure of **health impacts**, not merely compliance with local noise ordinances (CEQA Guidelines §15126.2(a)).

I1684-12

The EIR fails to incorporate or analyze the **Federal Railroad Administration's General Health Effects of Transportation Noise**, which concludes:

I1684-13

FRA Findings (General Health Effects of Transportation Noise):

> Chronic exposure above **55 dBA Ldn** increases risk of **hypertension, ischemic heart disease, and stroke**.
>
> Nighttime noise above **45 dBA** disrupts sleep architecture, leading to **cognitive impairment, metabolic disorders, and cardiovascular strain**.
>
> Noise increases of **10 dBA** are associated with **doubling of annoyance and stress-related health symptoms**.

I1684-14

These thresholds are **far lower** than the EIR's modeled levels for BIG.

Question: Doesn't this show the EIR's failure to analyze these health effects and violates CEQA's requirement to disclose "health and safety problems caused by the physical changes" (CEQA Guidelines §15126.2(a)).

I1684-15

The EIR Admits Significant and Unavoidable Impacts but Fails to Consider Feasible Mitigation

CEQA requires adoption of **all feasible mitigation** (§21002, §21081).

I1684-16

Yet the EIR:

> Rejects noise barriers as "financially infeasible".
>
> Rejects operational mitigations such as:

Train speed restrictions

Nighttime curfews

Quiet- zone- equivalent horn mitigation

Alternative track alignments

Relocation of the solar farm and substation away from homes

I1684-16 cont'd

Question: Does CEQA allow an agency to reject mitigation solely because it is expensive and because BNSF purchased so many surrounding properties prior to the release to decrease the number of vulnerable properties?

I1684-17

The EIR Fails to Analyze Disproportionate Impacts on Existing Residents

The EIR identifies the **same cluster of homes** as experiencing:

The highest operational noise increases (10–17.7 dBA CNEL)

The highest interior noise exceedances

The least feasible mitigation

I1684-18

Yet the EIR fails to analyze:

Disproportionate impacts on low- income or vulnerable residents

Disproportionate impacts on modular homes (which have lower sound insulation)

Environmental justice implications

Question: Doesn't this omission violate CEQA's requirement to analyze "disproportionately high and adverse effects" on vulnerable communities?

I1684-19

The EIR Fails to Analyze Sleep Disturbance Impacts Despite Acknowledging Nighttime Noise Exceedances

The EIR acknowledges:

Nighttime construction noise exceeds thresholds at multiple receptors.

Nighttime operational noise exceeds interior standards at all impacted receptors with windows open.

I1684-20

Question: Does the dEIR fail to apply the FICON/FICAN Sleep Disturbance Curve, despite claiming it did?

I1684-21

The FRA and EPA both conclude:

I1684-22

Nighttime noise above **45 dBA** causes measurable sleep disturbance.

Nighttime noise above **55 dBA** causes awakenings and cardiovascular stress. I1684-22 cont'd

Question: Isn't this a CEQA violation because the EIR fails to disclose the severity of health impacts as operational noise increases? I1684-23

Question: How does the Sylvan Ave Community respond to interior noise standards that cannot be met? I1684-24

Many of us rely on windows open for our homes. There is no feasible mitigation exists for windows-open conditions. I1684-25

Question: Isn't this is a permanent violation of interior noise standards? I1684-26

Question: Can the City of Barstow NOT permit construction during night time hours as a mitigation to noise exceeding thresholds and cannot be mitigated other ways? I1684-27

The EIR admits: I1684-28

33 kV line construction exceeds daytime and nighttime thresholds

Nighttime construction exceeds thresholds at multiple receptors.

Temporary barriers are "infeasible."

This is a **significant and unavoidable impact**.

IV. QUESTIONS FOR THE CITY AND BNSF (FOR THE PUBLIC RECORD)

To include the questions identified above, please also respond to the listed ones below: I1684-29

1. Most of us have large rural properties, intential for outdoor living spaces. How will mitigations protect us to maintain our current long standing outdoor lifestyles?

2. Why did the EIR reject BAR-1 and BAR-4 solely on financial grounds when CEQA does not allow cost to be the basis for rejecting feasible mitigation? I1684-30

2. Why were no operational mitigations (train speed limits, curfews, quiet-zone measures) evaluated? I1684-31

3. Why does the EIR fail to analyze FRA-documented health impacts of chronic noise exposure above 55 dBA Ldn? I1684-32

4. Why does the EIR fail to analyze sleep disturbance impacts despite nighttime interior levels exceeding 50 dBA Ldn? I1684-33

5. Why were modular homes not analyzed separately, given their lower sound insulation and higher vulnerability? I1684-34

6. Why does the EIR claim barriers are infeasible when the City routinely requires developers to construct sound walls? I1684-35

7. Why were residents not offered relocation assistance, sound insulation programs, or property acquisition when impacts are acknowledged as significant and unavoidable? I1684-36

8. Why does the EIR fail to analyze environmental justice impacts on the cluster of homes experiencing the highest noise increases? I1684-37

9. Where is the Sylvan Ave Community identified as a significatant sensitive receptor? Will there be monitoring parcel-specific for the Sylvan Ave Community residents? Will there be an on-going real time data survey that allows for a committee of impacted residents and agencies involved? I1684-38

10. Why is the Sylvan Ave Community - the most impacted community - the last to meet with agencies regarding this matter and why does it require so much effort to get protections when we are the least represented? I1684-39

REQUEST FOR ACTION

Based on the evidence, I request that the City: I1684-40

Recirculate the Noise & Vibration section under CEQA §15088.5 due to significant new information and analytical deficiencies.

Require BNSF to: I1684-41

Implement **all feasible operational mitigations**. I1684-42

Reevaluate **BAR-1 and BAR-4**. I1684-43

Provide **sound insulation or relocation assistance** to severely impacted residents. I1684-44

Designate the Sylvan Ave Community as a significant sensitive receptor. I1684-45

Create an oversight or independent review board to include Sylvan Ave Community residents, meeting monthly to analyze real-time monitoring and community concerns. I1684-46

Incorporate FRA, EPA, and WHO health research into the revised analysis. I1684-47

Conduct a **full environmental justice analysis**. I1684-48

Reevaluate cumulative impacts using accurate health-based thresholds.

The EIR's own data demonstrates that BIG will expose nearby residents—including my home—to **permanent, severe, and unmitigated noise impacts** far exceeding CEQA thresholds and federal health guidelines. I1684-49

The EIR fails to disclose, analyze, or mitigate these impacts as required by CEQA.

A revised and recirculated Noise & Vibration section should be legally required.

We are human beings, not exceeding thresholds or barely under the required values. I1684-50

I respectfully request that the City of Barstow and BNSF respond to these concerns and questions in writing and commit to a community-centered process as this project consideration moves forward.

Thank you for your time and consideration.

Sherry Baily

Sylvan Ave Community

Responses to Comment Letter I1684, Sherry Baily

I1684-1 This comment is introductory to the specific comments provided below. See **Consolidated Response 04** concerning general non-CEQA issues, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community.

I1684-2 The commentor asserts that certain deficiencies are common in draft EIR analyses for rail-industrial projects in general but does not assert Project-specific deficiencies of the Draft EIR. For methodology used in the Noise and Vibration analysis, see **Draft EIR Section 5.12 Noise and Vibration**. See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses.

I1684-3 See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses.

I1684-4 See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses.

As shown in **Draft EIR Figure 5.12-12: Modeled Sensitive Receptor Locations (BIG Specific Plan Area)**, on Draft EIR page 5.12-77, noise impacts to the Sylvan Community (receptor 3) were considered and included in noise model. The construction impact table only lists the nearest receptor to each active construction area and the operational impact tables only list the receptors for where there are potentially significant impacts requiring mitigation. **Appendix 5.12 BIG-1 – Appendix A** contains the results and impact screening analyses for all receptors. As shown in the modeling files contained in **Appendix 5.12 BIG-1 – Appendix A**, implementation of BIG would result in less than significant impacts at the Sylvan Community (Receptor 3).

I1684-5 See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses.

As stated on Draft EIR page 5.12-74, only the nearest sensitive receptor to construction activity associated with each Project component has been included in **Draft EIR Table 5.12-28: Maximum BIG Construction Noise Levels at Nearest Sensitive Receptors**. Construction noise levels at all modeled sensitive receptors are included in **Draft EIR Appendix 5.12 BIG-1 Noise Report** attachment SoundPLAN Modeling Results – Construction, as noted in the footer to **Draft EIR Table 5.12-28** (page 5.12-75). As shown in the SoundPLAN modeling results, combined construction noise associated with all Project components would result in noise levels up to 65.9 dBA at the Sylvan Community (Receiver 3), which would not exceed the FTA daytime or nighttime thresholds of 80 dBA $L_{eq(8\text{-}hr)}$ or 70 dBA $L_{eq(8\text{-}hr)}$, respectively. BIG would therefore result in less than significant construction noise impacts at the Sylvan Community.

As noted in **Draft EIR Table 5.12-29: Opening Year 2028 BIG Operational Noise-Levels – City/County Noise Standards Impact Analysis** and **Draft EIR Table 5.12-30: Opening Year 2028 BIG Operational Noise Levels – Noise Increase Impact Analysis** (page 5.12-81) only list

receptors that would, "under 'with BIG' conditions, exceed either the absolute noise standard or the incremental noise increase thresholds" and refers the reader to **Appendix 5.12 BIG-1 – Appendix A** for the results and impact screening analyses for all receptors. As shown in the SoundPLAN modeling results, Project operations under Opening Year 2028 would result in permanent increases in daytime and nighttime noise levels of 0.0 dBA and 1.0 dBA, respectively, at the Sylvan Community compared to No Project conditions which would not exceed the applicable incremental increase threshold of a 1.5 dBA. **Draft EIR Table 5.12-31: Opening Year 2028 Mitigated BIG Operational Noise Levels – City/County Noise Standards Impact Analysis** and **Draft EIR Table 5.12-32: Opening Year 2028 Mitigated BIG Operational Noise Levels – Noise Increase Impact Analysis** summarize mitigated noise levels at the affected receptors shown in **Draft EIR Table 5.12-29: Opening Year 2028 BIG Operational Noise Levels – City/County Noise Standards Impact Analysis** and **Draft EIR 5.12-30: Opening Year 2028 BIG Operational Noise Levels – Noise Increase Impact Analysis**. As unmitigated impacts at the Sylvan Community would be less than significant, mitigation is not required and the inclusion of receptor 3 in **Draft EIR Table 5.12-31: Opening Year 2028 Mitigated BIG Operational Noise Levels– City/County Noise Standards Impact Analysis** and **Draft EIR Table 5.12-32: Opening Year 2028 Mitigated BIG Operational Noise Levels – Noise Increase Impact Analysis** is not appropriate.

As noted on page 5.12-89 of the Draft EIR, **Draft EIR Table 5.12-33: Interim Year 2033 BIG Operational Noise-Levels – City/County Noise Standards Impact Analysis** and **Draft EIR Table 5.12-34: Interim Year 2033 BIG Operational Noise Levels – Noise Increase Impact Analysis** only list receptors that would, "under 'with BIG' conditions, exceed either the absolute noise standard or the incremental noise increase thresholds" and refers the reader to **Appendix 5.12 BIG-1 – Appendix A** for the results and impact screening analyses for all receptors. As shown in the SoundPLAN modeling results, Project operations under Interim Year 2033 would result in a decrease in daytime noise levels of -0.1 dBA and a permanent increase in nighttime noise levels of 0.7 dBA at the Sylvan Community compared to No Project conditions which would not exceed the applicable incremental increase threshold of a 1.5 dBA. **Draft EIR Table 5.12-35: Interim Year 2033 Mitigated BIG Operational Noise Levels – City/County Noise Standards Impact Analysis** and **Draft EIR Table 5.12-36: Interim Year 2033 Mitigated BIG Operational Noise Levels – Noise Increase Impact Analysis** summarize mitigated noise levels at the affected receptors shown in **Draft EIR Table 5.12-33** and **Draft EIR 5.12-34**. As unmitigated impacts at the Sylvan Community would be less than significant, mitigation is not required and the inclusion of receptor 3 in **Draft EIR Table 5.12-35** and **Draft EIR Table 5.12-36** is not appropriate.

As discussed above, analysis of noise impacts to the Sylvan Community has not been omitted from consideration. All modeling outputs are included in Appendix 5.12 BIG-1 and show that impacts to the Sylvan Community during constriction, Opening Year 2028 operations, and Interim Year 2033 operations would be less than significant.

I1684-6 See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses.

As noted in **Draft EIR Table 5.12-37: Horizon Year 2048 BIG Operational Noise-Levels – City/County Noise Standards Impact Analysis** and **Draft EIR Table 5.12-38: Horizon Year 2048 BIG Operational Noise Levels – Noise Increase Impact Analysis** (page 5.12-94) only list receptors that would, "under 'with BIG' conditions, exceed either the absolute noise standard or the incremental noise increase thresholds" and refers the reader to **Appendix 5.12 BIG-1 – Appendix A** for the results and impact screening analyses for all receptors. As shown in the SoundPLAN modeling results, Project operations under Horizon Year 2048 would result in a decrease in daytime noise levels of -0.9 dBA and a permanent increase in nighttime noise levels of 0.2 dBA at the Sylvan Community (receptor 3) compared to No Project conditions which would not exceed the applicable incremental increase threshold of a 1.5 dBA. Project operations under Horizon Year 2048 would result in a decrease in daytime noise levels of -0.1 dBA and a permanent increase in nighttime noise levels of 1.0 dBA at Receptor 2 compared to No Project conditions which would not exceed the applicable incremental increase threshold of a 1.5 dBA. **Draft EIR Table 5.12-39: Horizon Year 2048 Mitigated BIG Operational Noise Levels – City/County Noise Standards Impact Analysis** and **Draft EIR Table 5.12-40: Horizon Year 2048 Mitigated BIG Operational Noise Levels – Noise Increase Impact Analysis** summarize mitigated noise levels at the affected receptors shown in **Draft EIR Table 5.12-37** and **Draft EIR 5.12-38**. As unmitigated impacts at the Sylvan Community would be less than significant, mitigation is not required and the inclusion of receptors 2 and 3 in **Draft EIR Table 5.12-39** and **Draft EIR Table 5.12-40** is not appropriate.

I1684-7 See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses.

I1684-8 See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses.

I1684-9 The commenter mentions FRA, EPA, and WHO research, but doesn't provide any details attributable to the BIG Draft EIR noise analysis. Based on noise measurement data obtained by Kimley-Horn (see Draft EIR Table 5.12-23), existing noise levels at numerous sensitive receptors in the area surrounding BIG and near the existing rail line already exceed 55 dBA, the noise level established by EPA and WHO where cardiovascular effects, cognitive impacts, and annoyance can occur. The Draft EIR analyzed incremental noise impacts using the FICAN guidance, which accounts for heightened sensitivity where existing ambient noise levels are already high. The Draft EIR also evaluated potential impacts related to sleep disturbance and speech interference based on published methodologies by U.S. EPA and Federal Interagency Committee on Aviation Noise (FICAN). Sleep disturbance and speech interference impacts were found to be less than significant. BIG's noise impacts were evaluated for existing residential receptors adjacent to BIG and analyzed total noise exposure (exterior and interior), incremental effects, sleep disturbance, and speech interference.

Regarding the comment related to additional mitigation measures, alternative site layouts were evaluated in **Draft EIR Section 8.0: Alternatives to the Proposed Project**, and it was determined that operational restrictions would limit the alternatives' ability to achieve key

project objectives, BIG would not introduce any new at-grade rail crossings that would be eligible for a quiet zone; and BIG would also remove the existing rail crossing along Hinkley Road. Noise barrier feasibility was evaluated consistent with Caltrans methodologies regarding financial reasonability (i.e., a maximum allowance per benefited receptor). This approach prevents disproportionate spending on barriers that serve very few receptors at an extremely high cost. See also **Response O21-74** and **Response O21-75** concerning suggested additional mitigation measures.

The commentor provides several concerns within this comment that have been previously raised. The following responses address the concerns raised in this comment.

See **Consolidated Response 09-01** concerning consideration of the Sylvan community in the Draft EIR and as a sensitive receptor. See **Consolidated Response 09-11** concerning consideration of alternatives to minimize impacts to the Sylvan community. See **Consolidated Response 05** concerning feasible and enforceable mitigation. See **Consolidated Response 09-06** concerning cumulative impacts to the Sylvan community. See **Consolidated Response 09-02** concerning consideration of Sylvan Community in the Noise and Vibration analyses.

I1684-10 See **Consolidated Response 03** concerning recirculation of the Draft EIR and **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses.

I1684-11 **Draft EIR Impact 5.12-1** (pages 5.12-74 through 5.12-129) provides an analysis of BIG's transportation-related construction and operational-related traffic noise. **Draft EIR Section 5.12** (pages 5.12-18 through 5.12-20) also discloses the potential for human health noise impacts related to sleep disturbance and speech interference from BIG's highest single event level (SEL) (train horns).. See **Response I1683-4** and **Response O21-68** concerning potential human response to BIG noise impacts.

See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses and **Consolidated Response 06** concerning potential effects on communities.

I1684-12 The Draft EIR discloses the potential effects of noise and vibration disturbances on human health, including noise thresholds at which sleep disturbance is likely to occur; see **Draft EIR Section 5.12** pages 5.12-18 to 5.12-19, 5.12-36, 5.12-51, 5.12-62. See also **Response I1683-4, Response I1684-9, Response I1684-11**, and **Response O21-68** concerning potential human response to BIG noise impacts, **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses, and **Consolidated Response 06** concerning potential effects on communities.

I1684-13 The commentor introduces concerns related to the Federal Railroad Administration (FRA) "General Health Effects of Transportation Noise." As noted in the Draft EIR, the noise standards and methodologies from the Federal Transit Authority (FTA) "Transit Noise and Vibration Impact Assessment Manual," ("FTA guidelines") are relied on by FRA in evaluating improvements to conventional passenger and freight rail lines. Consistent with FTA

guidelines, the Draft EIR analyzes the potential health effects associated with noise exposure in relation to sleep disturbance utilizing Federal Interagency Committee on Aviation Noise (FICAN) sleep disturbance curve. The curve illustrates the maximum percent of a residential population to be behaviorally awakened when exposed to varying indoor noise levels. The sleep disturbance and speech interference analysis is included in **Draft EIR Appendix 5.12 BIG-1**, beginning on page 139. As shown on **Draft EIR Appendix 5.12 BIG-1 Table 59: BIG Operational Interior Noise Levels – Sleep Disturbance and Speech Interference Analysis**, BIG operations would not result in a significant percentage of the exposed population to awakenings and associated health effects associated with awakenings would therefore be less than significant.

I1684-14 The Draft EIR discloses the potential effects of noise and vibration disturbances on human health, including noise thresholds at which sleep disturbance is likely to occur; see **Draft EIR Section 5.12** pages 5.12-18 to 5.12-19, 5.12-36, 5.12-51, 5.12-62. See also **Response I1683-4, Response I1684-9, Response I1684-11**, and **Response O21-68** concerning potential human response to BIG noise impacts. See also **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses and **Consolidated Response 06** concerning potential effects on communities.

I1684-15 See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses and **Consolidated Response 06** concerning potential effects on communities. As discussed in **Response I1684-9** and **Response I1684-11 through Response I1684-14**, the potential for sleep disturbance associated with BIG operations has been disclosed and analyzed in the Draft EIR. As concluded on **Draft EIR Appendix 5.12 BIG-1 Table 59: Big Operational Interior Noise Levels – Sleep Disturbance and Speech Interference Analysis** (page 139), BIG operations would not result in a significant percentage of the exposed population to awakenings and would not interference with speech intelligibility at schools. Therefore, the Draft EIR does not fail to analyze BIG-related health effects and does not violate CEQA.

I1684-16 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 09-11** concerning consideration of alternatives to minimize impacts to the Sylvan Community, and **Response I1684-9** regarding design alternatives, operational restrictions, quiet zones, and noise barrier feasibility. Nighttime curfews would limit BIG's ability to meet project objectives and inhibit freight/logistic operations, defeating the purpose of BIG. See also **Response O21-74** and **Response O21-75** concerning the infeasibility of suggested mitigation for noise impacts.

I1684-17 See **Consolidated Response 05** concerning feasible and enforceable mitigation.

I1684-18 CEQA does not explicitly require a project to evaluate "disproportionately high and adverse" effects on minority or low-income populations or to prepare a stand-alone environmental justice (EJ) analysis. However, CEQA requires disclosure of all significant physical environmental impacts on people, including effects related to air quality, noise, traffic, hazards, and other topics that could affect human health and safety (State CEQA Guidelines

§§ 15126.2(a), 15065). Accordingly, the Draft EIR evaluates these environmental issues based on applicable CEQA thresholds and identifies feasible mitigation measures to reduce impact.

With respect to noise-related impacts, **Draft EIR Section 5.12** includes analysis of noise impacts at nearby sensitive receptors of all incomes. Where impacts were identified to be potentially significant, mitigation measures were proposed to reduce potential impacts. As concluded in **Draft EIR Impact 5.12-1** (pages 5.12-74 through 5.12-129), despite implementation of feasible mitigation, BIG would still result in significant and unavoidable impacts with respect to the exceedance of City and County noise level thresholds. The commenter asserts that modular homes have lower sound insulation and may experience disproportionate noise impacts from BIG. Detailed wall and window assembly information is needed to calculate the sound attenuation effects at the interior of modular homes near BIG, which is not readily available. Thus, published sound attenuation assumptions for residential dwellings for both windows closed and windows open conditions were used in the analysis to analyze interior noise impacts at nearby receptors. Also, see **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 06-04** concerning quality of life, and **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community.

I1684-19 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community.

I1684-20 See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses.

I1684-21 See **Response I1684-13** and **Response I1684-14** concerning the Draft EIR's analysis of potential health effects associated with noise exposure in relation to sleep disturbance utilizing Federal Interagency Committee on Aviation Noise (FICAN) sleep disturbance curve. See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses and **Response I1684-9** concerning potential human response to BIG noise impacts.

I1684-22 See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses and **Consolidated Response 04** concerning general non-CEQA issues.

I1684-23 See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses and **Consolidated Response 06** concerning potential effects on communities. See also **Response I1684-9** and **Response I1684-11** through **Response I1684-15.** The Draft EIR analyzed health impacts regarding sleep disturbance and speech interference and evaluated incremental increase noise impacts using thresholds from FICAN that account for heightened sensitivity where ambient noise levels are already high. The Draft EIR concluded there would be a significant and unavoidable impact for incremental noise increases despite implementation of feasible mitigation measures.

I1684-24 See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses and **Consolidated Response 04** concerning general non-CEQA issues.

I1684-25 See **Consolidated Response 05** concerning feasible and enforceable mitigation and **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses.

I1684-26 See **Consolidated Response 05** concerning feasible and enforceable mitigation and **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses.

I1684-27 See **Response L20-3,** and **Response O21-70** and revisions to **MM BIG NOI-1** discussed therein, which provide for a Nighttime Construction Noise Logistics Plan that would potentially include limitation of individual types of nighttime construction activity for BIG to daytime hours as mitigation for nighttime construction noise impacts, where feasible, if the Plan determines that other noise reduction measures incorporated into the Plan cannot feasibly ensure that exterior noise levels from an individual type of nighttime construction activity, at the residence or residences nearest to that activity, do not exceed the FTA's 70 dBA Leq (8-hour) nighttime exterior construction noise standard for residential uses. See also **Consolidated Response 05** concerning feasible and enforceable mitigation and **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses.

I1684-28 The comment notes that construction would result in significant and unavoidable impacts, and that temporary barriers were determined to be infeasible. As the comment does not raise any substantive issues regarding the adequacy of the Draft EIR, no further response is warranted.

I1684-29 See **Consolidated Response 06-04** concerning quality of life, and **Consolidated Response 04** concerning general non-CEQA issues.

I1684-30 See **Consolidated Response 05** concerning feasible and enforceable mitigation.

I1684-31 See **Consolidated Response 05** concerning feasible and enforceable mitigation and **Consolidated Response 09-11** concerning consideration of alternatives to minimize impacts to the Sylvan Community.

I1684-32 See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses and **Consolidated Response 06** concerning potential effects on communities.

I1684-33 See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses.

I1684-34 See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses, and **Response I1684-18** regarding modular home noise impacts.

I1684-35 See **Consolidated Response 05** concerning feasible and enforceable mitigation.

I1684-36 See **Consolidated Response 05** concerning feasible and enforceable mitigation.

I1684-37 See **Response I1684-18** concerning disproportionate adverse effects to vulnerable communities.

I1684-38 See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses.

I1684-39 See **Consolidated Response 01** concerning community outreach and the Draft EIR public review period, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community.

I1684-40 See **Consolidated Response 03** concerning recirculation of the Draft EIR.

I1684-41 **Draft EIR Section 5.12** included mitigation measures, **MM NOI-1** and **NOI-2** to be implemented to reduce potentially significant noise impacts. Pursuant to State CEQA Guidelines § 15097, the Lead Agency is required to adopt an MMRP which would comprise a compiled list of all required mitigation measures identified in the Draft EIR to reduce potentially significant environmental impacts. The MMRP would include the timing of implementation, monitoring and reporting methods, responsible monitor, and verification of completion. The City, as the Lead Agency, would be responsible for enforcing the MMRP. Also see **Consolidated Response 05** concerning feasible and enforceable mitigation.

I1684-42 See **Consolidated Response 05** concerning feasible and enforceable mitigation.

I1684-43 See **Consolidated Response 05** concerning feasible and enforceable mitigation.

I1684-44 See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses.

I1684-45 See **Consolidated Response 04** concerning general non-CEQA issues.

I1684-46 See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses, **Consolidated Response 06** concerning potential effects on communities, and **Response I1684-9** regarding FRA, EPA, and WHO noise impact guidance.

I1684-47 See **Response I1684-18** concerning environmental justice analysis under CEQA requirements.

I1684-48 See **Consolidated Response 09-06** concerning consideration of cumulative impacts to the Sylvan Community.

I1684-49 See **Consolidated Response 05** concerning feasible and enforceable mitigation and **Consolidated Response 03** concerning recirculation of the Draft EIR.

I1684-50 See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER I1685

I1685

January 2, 2026 5.12 Noise and Vibration dEIR Response

Supplemental comment to 5.12 #2

To the City of Barstow, Planners, and BNSF Railway:

This is my third attempt to express my concern regarding the environmental impact as health is extremely important - we only have one body in this lifetime; it is my responsibility to be a good caretaker of my health. I1685-1

Again, this is Sylvan Ave Community resident, Sherry Baily. After reviewing the Federal Railroad Administration's report on General Health Effects of Transportation Noise, discovering the Train Noise and Vibrations Reduction Act of 2025 (H.R. 2569), and the Protecting Homes from Trains Act of 2025 (H.R. 6064) - I feel it is of utmost importance to further require parcel-specific analysis and continuing monitoring of the Sylvan Ave Community impact. I1685-2

This supplemental comment addresses a critical and legally consequential flaw in the Draft Environmental Impact Report (DEIR): **the complete omission of the Sylvan Avenue residential community from the Noise and Vibration analysis in Section 5.12**. I1685-3

Sylvan Avenue is a long-established residential neighborhood located **directly south of the proposed BIG footprint**, within the same geographic zone as the receptors identified in Tables 5.12-29 through 5.12-40. Despite this, **the DEIR does not identify, model, analyze, or disclose noise or vibration impacts to any Sylvan Avenue homes**, nor does it include Sylvan Avenue in any receptor maps (Figures 5.12-11 through 5.12-13). I1685-4

This omission violates CEQA's fundamental requirements for full disclosure, accurate modeling, and analysis of impacts to all affected communities. I1685-5

I. CEQA Requires Analysis of All Affected Sensitive Receptors — the Sylvan Avenue Community Was Not Included

CEQA requires that an EIR: I1685-6

- Identify **all** sensitive receptors within the impact area
- Model and disclose **all** significant impacts
- Avoid selective or incomplete analysis
- Provide mitigation for **all** affected communities

The DEIR repeatedly states that receptors "south of BIG" would experience the most severe noise impacts (e.g., Tables 5.12-29, 5.12-30, 5.12-31, 5.12-32). Yet the **Sylvan Avenue Community — which is also directly south of BIG — is entirely absent from the receptor list**.

Evidence of Omission

No Sylvan Avenue receptors appear in **any** receptor tables (5.12-29 through 5.12-40).

No Sylvan Avenue receptors appear in **any** receptor maps (Figures 5.12-11 through 5.12-13).

No Sylvan Avenue addresses are included in the interior noise analysis (Tables 5.12-41 through 5.12-52).

No Sylvan Avenue homes are included in the roadway noise analysis (Tables 5.12-53 through 5.12-61).

I1685-7

This is not a minor oversight — it is a **systematic exclusion** of an entire residential neighborhood located within the same impact zone as the receptors that the DEIR acknowledges will experience:

Significant and unavoidable exterior noise impacts

Significant and unavoidable interior noise impacts

Significant and unavoidable roadway noise impacts

Significant and unavoidable construction noise impacts

I1685-8

By omitting Sylvan Avenue, the DEIR fails to disclose the full scope of environmental harm.

II. The Omission is Material Because Sylvan Avenue Is Closer to Several BIG Noise Sources Than Some Modeled Receptors

Based on the DEIR's own maps:

I1685-9

Sylvan Avenue lies **directly south of the solar farm**, **south of the intermodal facility**, and **south of the mainline tracks**.

I1685-10

Several modeled receptors (e.g., Receptors 83–90) are located **farther from BIG** than Sylvan Avenue homes.

The DEIR acknowledges that receptors south of BIG experience the **highest noise increases**, including:

Up to **17.7 dBA** increase (Table 5.12-30)

Up to **14.4 dBA** increase after mitigation (Table 5.12-32)

Interior noise levels exceeding **54–58 dBA Ldn** with windows open (Tables 5.12-43, 5.12-47, 5.12-51)

I1685-11

If these impacts occur at receptors farther away, then the **Sylvan Avenue Community — being closer — would experience equal or greater impacts**.

Yet the DEIR provides **no modeling, no disclosure, and no mitigation** for the Sylvan Avenue Community.

This violates CEQA's requirement for **accurate, complete, and good-faith disclosure**.

I1685-11 cont'd

III. The Omission Prevents the Public From Understanding the True Extent of Noise Harm

CEQA requires that an EIR:

> "Provide the public with detailed information about the effect a proposed project is likely to have on the environment."
>
> "Not omit essential information necessary for informed public participation."
>
> "Not segment or selectively analyze impacts."

I1685-12

By excluding the Sylvan Avenue Community, the DEIR:

> Prevents residents from understanding how BIG will affect their homes
>
> Prevents the City from evaluating feasible mitigation
>
> Prevents the public from meaningfully participating in the CEQA process without experiencing the footprint in person. People and agencies are relying on this report to inform the public. Our homes are not wasteland.
>
> Creates an artificially narrow impact footprint

I1685-13

This is a textbook CEQA disclosure failure.

IV. The Omission Conflicts With Federal Research on Health Impacts of Transportation Noise

The **Federal Railroad Administration's General Health Effects of Transportation Noise** report concludes that:

> Chronic exposure to rail noise above **55 dBA Ldn** increases risks of cardiovascular disease, hypertension, sleep disturbance, and cognitive impairment.
>
> Noise increases of **10 dBA** are perceived as a **doubling of loudness**.

I1685-14

Nighttime noise is particularly harmful due to sleep disruption. I1685-14 cont'd

The DEIR shows increases of:

13–17.7 dBA at receptors south of BIG

Interior noise levels exceeding 54–58 dBA Ldn with windows open

Significant and unavoidable impacts even after mitigation I1685-15

If Sylvan Avenue had been analyzed, it is highly likely that:

Noise levels would exceed FRA health- risk thresholds

Interior noise levels would exceed CEQA and HUD standards

Impacts would be significant and unavoidable

The omission therefore conceals **serious public health risks**. Why are my windows needing to be closed? My home has large picture windows for a reason - the view and the outdoor air.

V. Required Actions Under CEQA

Because Sylvan Avenue was omitted, the DEIR must be **revised and recirculated**.

CEQA requires recirculation when: I1685-16

"Significant new information" is added

"A new significant impact" is identified

"A substantially more severe impact" is identified

"The draft EIR is so fundamentally inadequate that meaningful public review is precluded"

All four apply here.

VI. Specific Questions for the City and BNSF I1685-17

Why were no Sylvan Avenue homes included in the receptor modeling for exterior noise, interior noise, vibration, or roadway noise?

What criteria were used to select receptors, and why does Sylvan Avenue meet none of them despite being within the impact zone? I1685-18

Will the City require BNSF to conduct full SoundPLAN modeling for all Sylvan Avenue parcels? I1685-19

Will the City recirculate the DEIR to include the Sylvan Avenue Community as required by CEQA? I1685-20

What mitigation measures will be required for Sylvan Avenue once impacts are properly disclosed? I1685-21

How will the City ensure that the omission of an entire neighborhood does not invalidate the EIR? I1685-22

VII. Requested CEQA Remedy I1685-23

I respectfully request that the City:

Acknowledge the omission of the Sylvan Avenue Community

Conduct full noise, vibration, and health-risk modeling for all Sylvan Avenue homes I1685-24

Revise and recirculate the DEIR I1685-25

Identify and require feasible mitigation for the Sylvan Avenue Community I1685-26

Extend the public comment period to allow residents to review the corrected analysis I1685-27

Failure to correct this omission would render the EIR legally inadequate. I1685-28

I respectfully request that the City of Barstow and BNSF respond to the above concerns in writing and commit to a community-centered process, as this project consideration needs to be complete. I1685-29

Thank you for your time and consideration.

Sherry Baily

Sylvan Ave Community

RESPONSES TO COMMENT LETTER I1685, SHERRY BAILY

I1685-1 See **Consolidated Response 04** concerning general non-CEQA issues.

I1685-2 See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses.

I1685-3 See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses.

I1685-4 See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses. As shown in **Draft EIR Figure 5.12-12: Modeled Sensitive Receptor Locations (BIG Specific Plan Area)** (page 5.12-77), noise impacts to the Sylvan Community (receptor 3) were considered and included in noise model. The construction impact table only lists the nearest receptor to each active construction area and the operational impact tables only list the receptors for where there are potentially significant impacts requiring mitigation. **Appendix 5.12 BIG-1 – Appendix A** contains the results and impact screening analyses for all receptors. As shown in the modeling files contained in **Appendix 5.12 BIG-1 – Appendix A,** BIG would result in less than significant impacts at the Sylvan Community (Receptor 3).

I1685-5 See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses. As noted in **Response I1685-4**, the Draft EIR considered and included the Sylvan Community in the analysis. Impacts to the Sylvan Community have not been omitted. No further response required.

I1685-6 See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses.

I1685-7 See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses. As shown in **Draft EIR Figure 5.12-12: Modeled Sensitive Receptor Locations (BIG Specific Plan Area)** (page 5.12-77), noise impacts to the Sylvan Community (Receptor 3) were considered and included in noise model.

I1685-8 See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses. As shown in **Draft EIR Figure 5.12-12: Modeled Sensitive Receptor Locations (BIG Specific Plan Area)** (page 5.12-77), noise impacts to the Sylvan Community (receptor 3) were considered and included in noise model. The construction impact table only lists the nearest receptor to each active construction area and the operational impact tables only list the receptors for where there are potentially significant impacts requiring mitigation. **Appendix 5.12 BIG-1 – Appendix A** contains the results and impact screening analyses for all receptors. As shown in the modeling files contained in **Appendix 5.12 BIG-1 – Appendix A**, BIG would result in less than significant impacts at the Sylvan Community (Receptor 3).

I1685-9 See **Response I1685-8** and **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor.

I1685-10 See **Response I1685-8** and **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor.

I1695-11 See **Response I1685-8** and **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor. As noted in **Response I1685-8**, BIG would result in less than significant impacts at the Sylvan Community (Receptor 3). Mitigation measures for noise-related impacts are discussed in **Draft EIR Section 5.12 Noise and Vibration**. See also **Consolidated Response 05** concerning feasible and enforceable mitigation.

I1685-12 See response **Consolidated Response 06-01** concerning the geographic scope of the environmental analysis and definition of study area. **Draft EIR Section 5.12 Noise and Vibration** and **Appendix 5.12 BIG-1** provides a description of the methodology and thresholds to which the noise impact analysis was evaluated. The methodology implemented was in compliance with Federal, State, and City noise thresholds, criteria, and standards. Therefore, the Draft EIR provided a detailed and complete analysis about BIG's potential impacts to the environment.

I1685-13 See **Response I1685-8** and **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor. The Sylvan Community was not excluded from the Draft EIR noise analysis.

I1685-14 This comment provides information on the Federal Railroad Administration General Heal Effects of Transportation Noise and does not raise any environmental concerns or issues with the Draft EIR. No further response is necessary.

I1685-15 See **Response I1685-8** and **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor. The Sylvan Community was not excluded from the Draft EIR noise analysis. Additionally, as mentioned in **Response I1685-8**, BIG would result in less than significant impacts at the Sylvan Community (Receptor 3).

I1685-16 See **Consolidated Response 03** concerning recirculation of the Draft EIR and **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor. The commentor asserts that the Draft EIR must be revised and recirculated because the Sylvan community was not evaluated in the Draft EIR and because there is new significant information, a new significant impact, a substantially more severe impact, and the Draft EIR is fundamentally inadequate. However, the new information, new significant impact, and substantially more severe impact are not explicitly stated. As mentioned in the above responses I1685-1 through I1685-15, the Sylvan Community was included in the Draft EIR noise analysis. No significant new information, new significant impacts, or substantially more severe impacts have been identified that would require recirculation of the Draft EIR. Lastly, as mentioned in **Response I1685-12**, the **Draft EIR Section 5.12 Noise and Vibration** and **Draft EIR Appendix 5.12 BIG-1** provides a description of the methodology and thresholds

to which the noise impact analysis was evaluated. The Draft EIR noise analysis was prepared in accordance with applicable Federal, State, and City noise thresholds, criteria and standards to provide a comprehensive analysis that evaluated BIG's potential environmental impacts.

I1685-17 See **Response I1685-8** and **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor. The Sylvan Community was not excluded from the Draft EIR noise analysis. Additionally, as mentioned in **Response I1685-8**, BIG would result in less than significant impacts at the Sylvan Community (Receptor 3).

I1685-18 See **Response I1685-8** and **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor. The Sylvan Community was not excluded from the Draft EIR noise analysis. See **Draft EIR Section 5.12 Noise and Vibration** and **Appendix 5.12 BIG-1** for a description of the criteria used to select sensitive receptors near BIG.

I1685-19 See **Response I1685-8** and **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor. The Sylvan Community was not excluded from the Draft EIR noise analysis. As such, a full SoundPLAN modeling for Sylvan Avenue parcels is not necessary.

I1685-20 See **Consolidated Response 03** concerning recirculation of the Draft EIR and **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor.

I1685-21 See **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor. See **Draft EIR Section 5.12 Noise and Vibration** for a description of the noise-related mitigation measures.

I1685-22 See **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor. The Sylvan Community was not excluded from the Draft EIR noise analysis.

I1685-23 See **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor. The Sylvan Community was not excluded from the Draft EIR noise analysis.

I1685-24 See **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor. The Sylvan Community was not excluded from the Draft EIR noise analysis.

I1685-25 See **Consolidated Response 03** concerning recirculation of the Draft EIR. The Draft EIR does not require recirculation.

I1685-26 See **Response I1683-3** concerning feasible mitigation, **Response O21-74** and **Response O21-75** concerning additional suggested mitigation measures and **Response I1683-10** concerning alternatives evaluated in the Draft EIR. See also **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 06** concerning potential effects

on communities, **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community, and **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses.

I1685-27 See **Consolidated Response 01-02** concerning the Draft EIR public review period; **Consolidated Response 01-01** concerning community outreach; and **Consolidated Response 03** concerning recirculation of the Draft EIR.

1685-28 and I1685-29 See **Consolidated Response 03** concerning recirculation of the Draft EIR; **Consolidated Response 01-01** concerning community outreach; **Consolidated Response 06** concerning potential effects on communities; and **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community.

COMMENT LETTER I1686

I1686

January 2, 2026 6.0 Cumulative Impacts dEIR Response

My name is Sherry Baily, and I live on Sylvan Avenue, directly next to the proposed Barstow International Gateway (BIG) project site. I am submitting this comment to address the **cumulative impacts** of the BIG project and the City's General Plan update. I1686-1

The Draft EIR fails to acknowledge, analyze, or protect my neighborhood, even though we are **in the epicenter of the cumulative impacts** created by this project and the other industrial facilities surrounding us. The Sylvan Avenue Commuity. I1686-2

1. The EIR Fails to Identify Sylvan Avenue as a Sensitive Receptor

CEQA requires the City to identify and analyze impacts on **sensitive receptors**, especially when a community is located next to a major industrial project.

Sylvan Avenue is:

- Immediately adjacent to the BIG footprint
- Downwind of diesel emissions
- Down- gradient for stormwater and groundwater flow
- Dependent on **private domestic wells**
- Already experiencing **arsenic contamination** in multiple wells
- Within the 1- mile cumulative air quality and noise study areas

I1686-3

Despite this, the EIR **never once identifies the Sylvan Avenue Community** as a sensitive receptor.

Would this not be a **major CEQA violation** and render the cumulative analysis legally inadequate?

The Cumulative Air Quality Analysis Ignores Our Community

The cumulative air quality section acknowledges:

- BIG's construction emissions exceed thresholds
- BIG's operational emissions exceed thresholds
- BIG + Barstow Yard + Logistics Facility = **significant and unavoidable impacts**

I1686-4

Yet, how is it that the EIR never evaluates what this means for the people who live **closest** to these emissions?

Sylvan Avenue is directly downwind of:

- Diesel locomotives
- Diesel trucks
- Diesel construction equipment
- 24/7 rail yard operations
- The existing Barstow Yard
- The proposed Swap Yard and Warehouse Facilities

The EIR's cumulative air quality analysis **excludes** our neighborhood entirely. This is not just an oversight — it is a **failure to disclose a major environmental impact**.

I1686-5

The Cumulative Hydrology Analysis Excludes Private Wells and Existing Arsenic Contamination

The cumulative hydrology section defines the groundwater study area as:

> "BIG footprint and aquifer(s) underlying BIG footprint."

This definition **excludes Sylvan Avenue**, even though:

- Our wells draw from the same aquifer
- We are down- gradient from BIG
- Construction will disturb soils and alter drainage
- BIG will increase impervious surfaces and reduce recharge
- Flood flows will be redirected toward our area
- Multiple well lab results report **elevated arsenic levels**

I1686-6

The EIR never analyzes:

- Whether BIG could worsen arsenic contamination
- Whether BIG could mobilize contaminants
- Whether BIG could reduce groundwater levels
- Whether BIG could cause well failure

This is a **fatal CEQA omission**.

I1686-7

The Cumulative Energy Analysis Ignores Grid Reliability for Nearby Residents

BIG will require enormous amounts of electricity for:

- Cranes
- Hostlers
- Lighting
- Ventilation
- Charging infrastructure

I1686-8

Yet the EIR never analyzes:

- Whether SCE can supply this power
- Whether new substations or transmission lines are needed
- Whether outages will increase for nearby homes
- Whether Sylvan Avenue residents will lose grid reliability

This is especially concerning because our community already experiences:

- Frequent outages
- Voltage drops
- Limited infrastructure support

I1686-9

The cumulative energy analysis is **incomplete and misleading**.

The EIR Contains Major Internal Inconsistencies

CEQA requires internal consistency across all sections of an EIR. This EIR fails that requirement.

I1686-10

Energy vs. Air Quality

- Energy section claims diesel use will decrease.
- Air Quality section shows massive diesel emissions.

I1686-11

Energy vs. GHG

- Energy claims solar will offset electricity.
- GHG section does not include any solar offsets.

I1686-12

Hydrology vs. Cumulative Hydrology

Hydrology claims impacts are less than significant.

Cumulative hydrology ignores private wells entirely. I1686-13

Noise vs. Cumulative Noise

Noise section claims mitigation reduces impacts.

Cumulative noise finds significant and unavoidable impacts. I1686-14

These contradictions undermine the credibility of the entire EIR.

The EIR Fails to Analyze Cumulative Health Risks

Sylvan Avenue residents face **multiple overlapping exposures**:

Diesel exhaust

PM2.5

Noise

Light pollution

Groundwater contamination

Flood risk

Grid instability I1686-15

CEQA requires a **cumulative health risk analysis** when multiple pollutants and stressors affect the same community.

The EIR does not provide one.

Requested Actions

Because the cumulative impacts analysis is incomplete, inconsistent, and fails to protect the Sylvan Avenue community, I request the following: I1686-16

1. Recirculation of the EIR

The cumulative impacts analysis must be revised and recirculated.

2. Identification of Sylvan Avenue as a Sensitive Receptor

This is required under CEQA. I1686-17

3. A full cumulative health risk assessment I1686-18

Including diesel, PM2.5, noise, groundwater, and energy impacts.

4. A localized groundwater impact study I1686-19

Including arsenic mobilization and well reliability.

5. A grid reliability analysis I1686-20

Including impacts on nearby homes.

6. Real mitigation I1686-21

Not promises, not assumptions, not compliance statements.

I respectfully request that the City of Barstow and BNSF respond to these questions and concerns in writing and commit to a community-centered process of project consideration. I1686-22

Best Regards,

Sherry Baily
Sylvan Ave Community

RESPONSE TO COMMENT LETTER I1686, SHERRY BAILY

I1686-1 This comment is introductory to the comments that follow. See **Consolidated Response 04** concerning general non-CEQA issues.

I1686-2 See **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR as a sensitive receptor, **Consolidated Response 06-01** concerning the geographic scope of the environmental analysis and definition of study area, and **Consolidated Response 09-06** concerning consideration of cumulative impacts to the Sylvan Community.

I1686-3 As mentioned above, see **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor.

- **Adjacent to the BIG Footprint:** The Sylvan Community is recognized within the Draft EIR. See **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor, and **Consolidated Response 06-01** concerning the geographic scope of the environmental analysis and definition of study area, which includes the Sylvan Community. See **Draft EIR Section 3.0: Project Description** (page 3-18) for a summary of the surrounding land uses for BIG, which includes the identification of residential uses to the south, such as the Sylvan Community.
- **Downwind of diesel emissions:** See **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis.
- **Down-gradient for stormwater and groundwater flow:** See **Consolidated Response 09-04** concerning consideration of the Sylvan Community in the Hydrology and Water Quality analyses.
- **Private domestic wells:** See **Consolidated Response 09-07** concerning consideration of impacts to Sylvan Community private water wells.
- **Arsenic Contamination:** See **Consolidated Response 09-10 c**oncerning consideration of the Sylvan Community in the Hazardous Materials analysis, including arsenic levels/mobilization.
- **1-mile cumulative air quality and noise study areas:** This statement is correct. The Sylvan Community is considered within the study area for noise and air quality. See **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor, and **Consolidated Response 06-01** concerning the geographic scope of the environmental analysis and definition of study area, which includes the Sylvan Community.

I1686-4 The comment is noted. See **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis.

I1686-5 See **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis.

I1686-6 See **Consolidated Response 09-10** concerning consideration of the Sylvan Community in the Hazardous Materials analysis, including arsenic levels/mobilization. See **Consolidated Response 09-07** concerning consideration of impacts to Sylvan Community private water wells. See **Consolidated Response 09-04** concerning consideration of the Sylvan Community in the Hydrology and Water Quality analyses.

I1686-7 **Arsenic Contamination:** See **Consolidated Response 09-10** concerning consideration of the Sylvan Community in the Hazardous Materials analysis, including arsenic levels/mobilization.

- **Mobilization of contaminants**: See **Draft EIR Section 5.9 Hazards, Hazardous Materials, and Wildfire (**page 5.9-99) for a detailed analysis concerning the mobilization of contaminants. As discussed, BIG construction activities would require temporary transport, use, and disposal of hazardous materials and waste. **MM BIG HAZ-1** would decrease the potential for significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials and waste during construction. Although BIG construction would involve the temporary handling of hazardous materials and waste, when hazardous materials and waste are properly used, transported, stored, and disposed of according to the manufacturers' guidelines and regulatory agency regulations, they present no substantial hazard to the community. Per § 402 of the CWA, BIG construction would be required to develop and implement a SWPPP which would specify BMPs for proper transport, use, and disposal of any hazardous materials and waste and prevent all construction pollutants from contacting stormwater and erosion from moving off the site into receiving waters. Therefore, through compliance with guidelines and regulations regarding the transport, use, or disposal of hazardous materials and waste and implementation of construction BMPs (e.g., proper handling, transportation, and storage), BIG would not create a significant hazard to the public or the environment. As discussed on Draft EIR page 5.9-101, BIG operations would involve the routine transport, use, and disposal of hazardous materials and waste, and thus could create a significant hazard to the public or the environment through the routine transport, use, and disposal of hazardous materials and waste. Routine transport of hazardous materials and waste via rail would be regulated by numerous federal, State, and local regulations. Locally, the SBC Fire's Hazardous Materials Division (CUPA) administers the County's hazardous materials program, which regulates the transport of flammable chemicals and liquids. The transportation of hazardous materials and waste would comply with all federal, State, and local laws and regulations regarding the safe transport of hazardous materials and waste, which would be effective in preventing a hazard to the public. Through compliance with federal, State, and local laws and regulations regarding the safe transport of hazardous materials and waste and design elements, BIG would not create a significant hazard to the public or the environment through the routine transport, use, and disposal of hazardous materials. Additionally, compliance with the established regulatory framework, existing BNSF policies and procedures, as well as implementation of **MM BIG HAZ-1** which employs the preparation of a Limited Soil Management Plan (SMP), a less than significant impact would occur after

mitigation.

- **Reduction of groundwater levels:** See **Consolidated Response 09-04** concerning consideration of the Sylvan Community in the Hydrology and Water Quality analyses.
- **Well failure:** See **Draft EIR Section 5.10: Hydrology and Water Quality** concerning potential impacts on groundwater levels. See **Draft EIR Impact 5.10-2** (pages 5.10-57 through 5.10-59), concerning groundwater levels as well as **Consolidated Response 09-07** concerning consideration of impacts to Sylvan Community private water wells**.**

I1686-8

- **SCE power Supply**: See **Consolidated Response 11** concerning energy and power supply.
- **Substations/Transmission Lines:** See **Consolidated Response 11** concerning energy and power supply.
- **Outage Increases:** See **Consolidated Response 11** concerning energy and power supply.
- **Sylvan Community grid reliability:** See **Consolidated Response 11** concerning energy and power supply.

I1686-9 **Draft EIR Section 5.6: Energy** was analyzed in compliance with State CEQA Guidelines Appendix G. State CEQA Guidelines § 15126.2 states that an EIR shall focus on effects of the proposed project on the environment, not existing conditions within the study area. See **Consolidated Response 11** concerning energy and power supply.

I1686-10 See below **Responses I1686-11** through **11686-14** concerning internal consistencies in the Draft EIR**.**

I1686-11 See **Response I1680-3.**

I1686-12 **Draft EIR Section 5.8: Greenhouse Gas Emissions** (**page 5.8-3**) states that as part of BIG, environmental impacts would be reduced by utilizing electric cargo handling equipment, renewable energy sources like solar power, increasing renewable diesel usage, utilizing a dedicated Tier 4 fleet for the trains from the Ports to BIG's intermodal facility, and adhering to state regulations for cleaner vehicle technologies. Ultimately, BIG is a net GHG-reduction project. Additionally, BIG's GHG emissions would decrease with implementation of Air Quality and Energy mitigation measures (see Draft EIR pages 5.3-104 to 5.3-108). **Draft EIR Table 5.8-12: BIG GHG Emissions** includes a summary of the emissions source reductions from the solar farm and rooftop solar mechanisms. This is consistent with the conclusion from **Draft EIR Section 5.6: Energy** (page 5.6-2) which states that operationally BIG would require substantial electricity and fuel. Electrical demands include lighting, heating, ventilation, electric hostler charging, cranes, and more. A solar farm would help offset a portion of the electricity needs. Measures to minimize or mitigate energy use, such as renewable diesel for equipment and the installation of solar panels are discussed in the section. Therefore, there is no internal inconsistency concerning solar offsets.

I1686-13 **Draft EIR Section 5.10: Hydrology and Water Quality** (page 5.10-79) states that BIG would result in no significant unavoidable impacts concerning hydrology and water quality. As demonstrated throughout the section, all impacts would be less than significant. Concerning each impact threshold, see **Draft EIR Section 5.10**. See **Consolidated Response 09-07** concerning consideration of impacts to Sylvan Community private water wells, and how it applies to **Draft EIR Section 5.10**.

I1686-14 **Draft EIR Section 5.12 Noise** (page 5.12-136) states that 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. Additionally, nighttime construction would exceed nighttime noise standards at nearby sensitive receptors, despite implementation of **MM BIG NOI-1**. Further, BIG operational noise could result in a significant and unavoidable impact as the feasible noise barriers included in **MM BIG NOI-2** would not reduce long-term BIG noise levels at all sensitive receptors below applicable exterior/interior noise standards and/or would result in a substantial noise increase compared to No BIG conditions. Therefore, BIG would result in a significant and unavoidable impact concerning noise during construction and operations. This is also reflected in **Draft EIR Section 6.0: Cumulative Impacts** pages 6-42 through 6.43. Therefore, there are no contradictions within the Draft EIR concerning noise.

I1686-15 As mentioned above, State CEQA Guidelines § 15126.2 states that an EIR shall focus on effects of the proposed project on the environment, not existing conditions within the study area, which includes the Sylvan Community. See **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis, including cumulative health risks, **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses, and **Draft EIR Appendix 5.3 BIG-1: Air Quality Technical Report** (Section 6.9) concerning health risks.

I1686-16 See **Consolidated Response 03** concerning recirculation of the Draft EIR.

I1686-17 See **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor.

I1686-18 See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses**, Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis, **Draft EIR Appendix 5.3 BIG-1: Air Quality Technical Report** (Section 6.9) concerning health risks, and **Consolidated Response 17** concerning health impact analysis. See **Draft EIR Section 5.12, Draft EIR Section 5.10,** and **Draft EIR Section 5.6** for an analysis of noise, groundwater, and energy impacts, respectively.

I1686-19 See **Draft EIR Appendix 5.10 BIG-1: Hydrology and Hydraulic Design Technical Report** for more information on potential groundwater impacts, also see **Draft EIR Section 5.10: Hydrology and Water Quality for** a discussion on potential impacts to groundwater from BIG construction and operations.

I1686-20 BIG incorporated power-reliability planning from the earliest design and environmental review stages. Rather than relying on Barstow's existing electrical system to absorb a sudden, large new load, BIG was structured to add capacity before demand, phase power-intensive uses gradually, and reduce reliance on the regional grid. **Draft EIR Section 3.0: Project Description** notes that BIG includes a private on-site solar energy facility located within its footprint. The purpose of this private utility is to supply a substantial portion of the facility's operational power internally rather than drawing it all from the local grid. By generating electricity on site BIG reduces peak demand on the regional utility system, insulates local neighborhoods from sudden load increases, and minimizes the risk of brownouts or service interruptions during high-use periods.

BIG implementation would occur over a multi-decade planning horizon and would be aligned with infrastructure readiness. Power-intensive components such as intermodal equipment, rail yard operations, and warehouse facilities are brought online gradually. Electrical upgrades would be completed before new demand as introduced, ensuring that load growth to be predictable and manageable.

Draft EIR Section 3.0 identifies BIG's proposed on- and off-site utility improvements. Therefore, electrical infrastructure upgrades are a required component of development. These upgrades include new distribution infrastructure sized specifically for BIG's operational needs. It is noted that power infrastructure improvements must be completed in advance of each phase, BIG does not depend on existing residential or commercial feeders, and utility coordination has occurred and would continue to occur with SCE to ensure no degradation of service to current customers.

I1686-21 See **Final EIR: Mitigation Monitoring and Reporting Program** and **Draft EIR Section 1.0: Executive Summary Table 1-2: Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance after Mitigation — BIG** for a list of the impact thresholds and mitigation measures proposed for BIG, along with implementation responsibility for each. As stated above, the Sylvan Community is identified within the study area for all sections of the Draft EIR, and as such is encompassed within applicable mitigation measures. Additionally, see **Consolidated Response 12-03** concerning enforceability of the Project components and mitigation measures for the Project.

I1686-22 See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER I1687

I1687

MASTER SUMMARY LETTER

Submitted by: Sherry Baily, Sylvan Avenue Community
Re: CEQA Deficiencies in the Draft Environmental Impact Report (DEIR) for the Barstow International Gateway (BIG) Project

Date: January 2026

To the City of Barstow, Planning Department, BNSF Railway, and Responsible Agencies:

My name is **Sherry Baily**, and I live directly adjacent to the proposed Barstow International Gateway (BIG) project site. I am submitting this master summary letter to consolidate my full set of CEQA comments and to formally document the significant omissions, inconsistencies, and deficiencies in the Draft Environmental Impact Report (DEIR). These deficiencies prevent meaningful public review and fail to protect the health, safety, homes, and well-being of the Sylvan Avenue Community — the residential neighborhood most directly and disproportionately affected by this project. I1687-1

I submit this letter not only as a homeowner, but as a long-time resident, a private well user, a small business owner, and a person living with health vulnerabilities that make environmental exposures especially harmful. I also submit this as a community advocate who has spent years attending meetings, organizing neighbors, reviewing technical documents, and engaging in good faith with agencies that have not meaningfully engaged with us in return.

The DEIR, as written, does not meet CEQA's requirements for full disclosure, accurate analysis, feasible mitigation, or community protection. For the reasons summarized below, the DEIR must be **revised and recirculated**. I1687-2

I. The DEIR Fails to Identify or Analyze the Sylvan Avenue Community as a Sensitive Receptor I1687-3

The most fundamental CEQA failure is the complete omission of the Sylvan Avenue Community — despite our proximity to the project footprint and our direct exposure to noise, vibration, air pollution, lighting, hydrology changes, and cumulative impacts.

The DEIR:

- Does not identify Sylvan Avenue as a sensitive receptor
- Does not model noise or vibration for our parcels
- Does not model air quality impacts for our parcels
- Does not analyze hydrology or groundwater impacts to our private wells
- Does not include us in cumulative impacts
- Uses maps and receptor tables that omit our neighborhood entirely

I1687-4

This omission is not a minor oversight — it is a **fatal CEQA flaw** that prevents informed public review and conceals the true extent of environmental harm.

II. Noise & Vibration: Significant and Unavoidable Impacts Without Required Analysis

The DEIR admits that BIG will cause **significant and unavoidable noise impacts**, including:

- Nighttime construction noise
- Operational rail noise
- Groundborne vibration
- Low- frequency rumble
- Interior noise exceedances

I1687-5

Yet the DEIR:

- Does not model Sylvan Avenue homes
- Does not analyze sleep disturbance
- Does not analyze health impacts
- Does not analyze modular home vulnerability
- Rejects feasible mitigation based solely on cost
- Provides no parcel- specific protections

Federal research (FRA, EPA, WHO) shows that chronic noise above 55 dBA increases risks of hypertension, cardiovascular disease, stress, and sleep disruption. The DEIR does not disclose these health impacts.

I1687-6

This violates CEQA's requirement to analyze health and safety effects of physical environmental changes.

III. Air Quality: Significant and Unavoidable Impacts Without Health Risk Analysis

The DEIR acknowledges:

- Construction emissions exceed thresholds
- Operational emissions exceed thresholds
- Diesel particulate matter (DPM) will increase cancer risk
- PM10 and PM2.5 will worsen nonattainment

I1687-7

Yet the DEIR:

- Does not analyze localized exposure for Sylvan Avenue
- Does not conduct a Health Risk Assessment for our community
- Does not analyze outdoor exposure for residents with large rural parcels
- Does not analyze cumulative exposure from existing rail operations

This omission is especially harmful because I live with autoimmune and respiratory vulnerabilities, and my modular home is more permeable to pollutants.

I1687-8

IV. Hydrology & Water Quality: No Analysis of Private Wells, Arsenic, or Recharge Zones

I1687-9

The DEIR fails to analyze impacts to private domestic wells — despite the fact that:

- Our wells are shallow and vulnerable
- Multiple wells already show elevated arsenic
- Two regional recharge basins lie within the BIG footprint
- Construction can mobilize arsenic and contaminants
- Stormwater and flood flows can carry pollutants toward our community

I1687-9 cont.

The DEIR does not analyze:

- Arsenic mobilization
- Contaminant migration
- Reduced recharge
- Well failure
- SGMA compliance
- Mojave Basin adjudication conflicts

I1687-10

This is a major CEQA deficiency.

V. Aesthetics, Lighting, and Visual Character: No Analysis of Residential Impacts

The DEIR acknowledges significant and unavoidable light pollution but does not analyze:

I1687-11

- Light trespass
- Loss of dark skies
- Visual obstruction of mountains and Mojave River
- Industrialization of a rural residential setting
- Solar farm glare

No visual simulations were prepared from Sylvan Avenue — the closest residential viewpoint.

I1687-12

This violates CEQA's requirement for representative public viewpoints.

VI. Biological Resources: Outdated Surveys and No Ecosystem-Level Analysis

The DEIR relies on:

- Outdated surveys
- Incomplete access
- Off-season observations

I1687-13

It does not analyze:

- Wildlife movement disruption
- Predator-prey imbalance
- Nocturnal species impacts
- Habitat fragmentation

- Cumulative ecological effects

I1687-13 cont.

My long-term observations contradict the DEIR's assumptions and demonstrate a functioning ecosystem that will be irreversibly altered.

I1687-14

VII. Cultural Resources: Failure to Analyze Route 66 as a Cultural Landscape

Route 66 is a nationally recognized historic resource. The DEIR does not analyze:

- Cultural landscape integrity
- Setting, feeling, and association
- Centennial-year significance
- Impacts to pedestrian and bicycle travelers

I1687-15

This is a major omission under CEQA's historical resource requirements.

VIII. Energy: Internal Contradictions and No Grid Reliability Analysis

The Energy section claims:

- Diesel use will decrease
- Renewable diesel will be used
- Solar will offset electricity

I1687-16

The Air Quality section contradicts all of this.

The DEIR also fails to analyze:

- Grid reliability
- SCE capacity
- New substations or transmission lines
- Impacts on nearby homes

This is a CEQA inconsistency.

IX. Cumulative Impacts: Incomplete, Inconsistent, and Legally Inadequate

The DEIR does not analyze cumulative impacts to:

- Private wells
- Air quality
- Noise
- Health
- Grid reliability
- Environmental justice

I1687-17

The cumulative analysis excludes the community most affected.

X. Requested CEQA Actions

I1687-18

Based on the deficiencies documented above, I respectfully request:

1. Recirculation of the DEIR under CEQA §15088.5

Due to significant new information, omissions, and analytical flaws.

I1687-18 cont.

2. Identification of the Sylvan Avenue Community as a Sensitive Receptor

Across all environmental topic areas.

I1687-19

3. Full parcel-specific modeling for noise, vibration, air quality, hydrology, and lighting

I1687-20

4. A cumulative health risk assessment

Including diesel, PM2.5, noise, groundwater, and lighting.

I1687-21

5. A localized groundwater impact study

Including arsenic mobilization and recharge impacts.

I1687-22

6. Feasible mitigation measures

Not vague promises or unenforceable assumptions.

I1687-23

7. A community oversight and monitoring program

With real-time data and resident participation.

I1687-24

8. Consideration of relocation assistance or property acquisition

If impacts remain significant and unavoidable.

I1687-25

Closing Statement

I have participated in every public process available to me. I have listened, learned, asked questions, and engaged respectfully. I have walked my community, gathered stories, and advocated for transparency. I have done everything asked of a resident — and more.

All I ask in return is that the City and BNSF honor CEQA's purpose:
to protect human health, ensure informed decision-making, and prevent environmental harm.

The Sylvan Avenue Community deserves full disclosure, meaningful protections, and a fair process.

I respectfully request written responses to all concerns and questions raised in this letter and in my full set of submitted comments.

I1687-26

RESPONSE TO COMMENT LETTER I1687, SHERRY BAILY 13OF13

I1687-1 This comment is introductory to the comments that follow. See **Consolidated Response 04** concerning general non-CEQA issues.

I1687-2 See **Consolidated Response 03** concerning recirculation of the Draft EIR.

I1687-3 See **Consolidated Response 06-01** concerning the geographic scope of the environmental analysis and definition of study area, which includes the Sylvan Community.

I1687-4

- **Sensitive Receptors:** See **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor.
- **Noise/Vibration Modeling**: See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses.
- **Air Quality Modeling**: See **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis.
- **Hydrology/Groundwater Impacts to Private Wells**: See **Consolidated Response 09-04** concerning consideration of the Sylvan Community in the Hydrology and Water Quality analyses, and **Consolidated Response 09-07** concerning consideration of impacts to Sylvan Community private water wells.
- **Sylvan Community Omission**: See **Consolidated Response 06-01** concerning the geographic scope of the environmental analysis and definition of study area, which includes the Sylvan Community.

This comment is acknowledged. As outlined above, the Sylvan Community was not omitted from the Draft EIR. Environmental impacts were analyzed using the thresholds outlined in State CEQA Guidelines Appendix G.

I1687-5 **Draft EIR Section 5.12: Noise and Vibration** page 5.12-136 states that 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. Additionally, nighttime construction would exceed nighttime noise standards at nearby sensitive receptors, despite implementation of **MM BIG NOI-1**. Further, BIG operational noise could result in a significant and unavoidable impact as the feasible noise barriers included in **MM BIG NOI-2** would not reduce long-term BIG noise levels at all sensitive receptors below applicable exterior/interior noise standards and/or would result in a substantial noise increase compared to No BIG conditions. Therefore, BIG would result in a significant and unavoidable impact concerning noise during construction and operations.

- **Sylvan Community home modeling:** See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses.
- **Sleep Disturbance:** See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses.

- **Health Impacts:** See **Consolidated Response 09-02** and **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis.
- **Modular Home Vulnerability:** Modular home vulnerability is not a required point of analysis under State CEQA Guidelines Appendix G. See **Response I1684-18**.
- **Rejects feasible mitigation:** The Draft EIR, prepared in accordance with the State CEQA Guidelines, identified significant environmental impacts associated with BIG. These findings are detailed within the "Impact Thresholds and Significance Criteria" subsections across **Draft EIR Sections 5.1** through **5.17**. State CEQA Guidelines § 15126.4(a)(1) specifies that an EIR shall describe feasible measures that could minimize significant adverse impacts. State CEQA Guidelines § 15126.4(a)(3-4) specifies mitigation measures are not required for effects which are not found to be significant and must be consistent with all applicable constitutional requirements, including the following:
    - There must be an essential nexus (i.e., connection) between the mitigation measure and a legitimate governmental interest.[20]
    - The mitigation measure must be "roughly proportional" to the impacts of the project.[21] Where the mitigation measure is an ad hoc exaction, it must be "roughly proportional" to the impacts of the project.[22]

The Draft EIR identified mitigation measures, which would reduce BIG's impacts within the relevant study areas to less than significant in **Draft EIR Section 1.0: Executive Summary** (Draft EIR pages 1-43 to 1-94). BIG's significant effects, which could not be reduced to less than significant despite incorporation of mitigation measures, are found in the Draft EIR under the "Impact Thresholds and Significance Criteria" subsections in the **Draft EIR Sections 5.1 through 5.17**.

Public Resources Code § 21081.6 requires that all public agencies establish monitoring/ reporting procedures for mitigation adopted as conditions of approval in order to mitigate or avoid significant environmental impacts. As required by Public Resources Code § 21081.6, the City of Barstow would develop a Mitigation Monitoring and Reporting Program (MMRP) to provide a vehicle by which to monitor the mitigation measures (MMs) applicable to BIG. The City of Barstow, as the Lead Agency for the Project, would be responsible for ensuring MMRP implementation.

- **Parcel-specific protections:** This comment is unclear. See **Response I1687-5 (Rejects feasible mitigation)** concerning proposed mitigation measures for BIG.

I1687-6 The relevant regulatory setting, including noise abatement criteria and noise intrusion guidelines from the Federal Highway Administration, United States Environmental Protection Agency, and the United States Department of Housing and Urban Development, is included in **Draft EIR Section 5.12.2: Regulatory Setting.** See **Consolidated Response 09-02** concerning

[20] *Nollan v. California Coastal Commission* (1987) 483 U.S. 825.
[21] *Dolan v. City of Tigard, 512 U.S. 374* (1994).
[22] *Ehrlich v. City of Culver City* (1996) 12 Cal.4th 854.

consideration of the Sylvan Community in the Noise and Vibration analyses and **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis for an analysis of potential health and safety impacts to the Sylvan Community.

I1687-7 **Draft EIR Section 5.3: Air Quality** states that BIG would result in significant and unavoidable impacts with regard to air quality planning, criteria pollutant emissions, and exposure of sensitive populations.

- **Localized Exposure for Sylvan Community:** See **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis.
- **Health Risk Assessment:** See **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis and **Draft EIR Appendix 5.3 BIG-1: Air Quality Technical Report (Section 6.9)** concerning health risk.
- **Outdoor Exposure:** See **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis.
- **Cumulative Exposure:** See **Draft EIR Section 6.0: Cumulative Impacts** concerning the potential cumulative impacts of BIG.

I1687-8 See **Consolidated Response 04** concerning general non-CEQA issues.

I1687-9 See **Consolidated Response 09-07** concerning consideration of impacts to Sylvan Community private water wells. Further, State CEQA Guidelines § 15126.2 states that an EIR shall focus on effects of the proposed project on the environment, not existing conditions within the study area, such as the environmental conditions of private wells of Sylvan Community residents.

I1687-10

- Arsenic mobilization: See **Consolidated Response 09-10** concerning consideration of the Sylvan Community in the Hazardous Materials analysis, including arsenic levels/ mobilization.
- **Contamination migration**: See **Draft EIR Section 5.9 Hazards, Hazardous Materials, and Wildfire** concerning the mobilization of contaminants. As discussed on Draft EIR page 5.9-99, BIG construction activities would require temporary transport, use, and disposal of hazardous materials and waste. **MM BIG HAZ-1** would decrease the potential for significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials and waste during construction. Although BIG construction would involve the temporary handling of hazardous materials and waste, when hazardous materials and waste are properly used, transported, stored, and disposed of according to the manufacturers' guidelines and regulatory agency regulations, they present no substantial hazard to the community. Per § 402 of the CWA, BIG construction would be required to develop and implement a SWPPP which would specify BMPs for proper transport, use, and disposal of any hazardous materials and waste and prevent all construction pollutants from contacting stormwater and erosion

from moving off the site into receiving waters. Therefore, through compliance with guidelines and regulations regarding the transport, use, or disposal of hazardous materials and waste and implementation of construction BMPs (e.g., proper handling, transportation, and storage), BIG would not create a significant hazard to the public or the environment. As discussed on Draft EIR page 5.9-101, Operationally, BIG would involve the routine transport, use, and disposal of hazardous materials and waste, and thus could create a significant hazard to the public or the environment through the routine transport, use, and disposal of hazardous materials and waste. Routine transport of hazardous materials and waste via rail would be regulated by numerous federal, State, and local regulations. Locally, the SBC Fire's Hazardous Materials Division (CUPA) administers the County's hazardous materials program, which regulates the transport of flammable chemicals and liquids. The transportation of hazardous materials and waste would comply with all federal, State, and local laws and regulations regarding the safe transport of hazardous materials and waste, which would be effective in preventing a hazard to the public. Through compliance with federal, State, and local laws and regulations regarding the safe transport of hazardous materials and waste and design elements, BIG would not create a significant hazard to the public or the environment through the routine transport, use, and disposal of hazardous materials. Additionally, compliance with the established regulatory framework, existing BNSF policies and procedures, as well as implementation of **BIG HAZ-1** which employs the preparation of a Limited Soil Management Plan (SMP), a less than significant impact would occur after mitigation.

- **Reduced recharge:** See **Consolidated Response 09-04** concerning consideration of the Sylvan Community in the Hydrology and Water Quality analyses.
- **Well Failure:** See **Draft EIR Section 5.10: Hydrology and Water Quality** concerning potential impacts on groundwater levels. See **Draft EIR Impact 5.10-2** (pages 5.10-57 through 5.10-59)**,** which analyzes potential impacts concerning groundwater levels as well as **Consolidated Response 09-04** concerning consideration of the Sylvan Community in the Hydrology and Water Quality analyses**.**
- **SGMA compliance:** As discussed in **Draft EIR Section 5.10** (page 5.10-78), The BIG footprint is within the Mojave Basin – Centro Subarea, which is an adjudicated groundwater basin. Adjudicated basins, like the Mojave Basin – Centro Subarea, are exempt from SGMA because such basins already operate under a court-ordered management plan to ensure the long-term sustainability of the subbasin; see **Draft EIR Section 5.10.2.3**. Therefore, none of BIG's components would obstruct or prevent implementation of the management plan for the Mojave Groundwater Basin. As such, construction, and operation of the BIG footprint, would not conflict with any sustainable groundwater management plan. Impacts would be less than significant, and no mitigation is required.

- **Mojave Basin adjudication conflicts:** See **Response I1687-10 Well Failure** concerning Mojave Basin adjudication.

I1687-11

- Light trespass: See **Consolidated Response 09-05** concerning consideration of the Sylvan Community in the lighting analysis.
- Loss of dark skies: See **Draft EIR Impact 5.1-4** (pages 5.1-65 through 5.1-75) concerning light and glare associated with BIG. As discussed on Draft EIR page 5.1-75, nighttime lighting disturbances such as glare, light pollution, and glow affecting viewers, visual character, and visual quality would result from BIG operations and built features. Glare impacts would be reduced in these locations by utilizing lighting with high-efficiency technologies, dark-sky cutoffs, strategic orientation to avoid light trespass into adjacent properties and open space areas, and appropriate shielding or recesses to avoid glare and reflections. Mitigation Measure (MM) BIG AES-1 requires the preparation and implementation of a Construction Lighting and Screening Plan (CLSP) that requires visual screening (i.e., temporary fencing). Additionally, the CLSP is required to identify and implement lighting treatments for all construction work areas (i.e., maximum brightness values not to be exceeded by artificial bulbs, screening around BIG's footprint to limit light and glare, and use of non-reflective glass. The CLSP would also identify methods used to ensure construction lighting is directional (aimed toward work areas and away from nearby sensitive receptors) and limited to sufficient wattage for safety and security. However, visual degradation caused by necessary nighttime and daytime lighting of features during BIG operations, including visually apparent barriers, signage, contrasting signal lighting, and the residual glare impacts would remain potentially significant. Similarly, as BIG would operate 24 hours a day, BIG would introduce new significant light pollution and glow impacts during nighttime hours. See the end of this **Response 1676-3** for the Statement of Overriding Considerations. Additionally, BIG would comply with San Bernadino County Municipal Code Chapter 83.07 (d) Dark Sky Curfew, which states that all outdoor lighting shall be extinguished by 11:00 PM, close of business, or when people are no longer present in exterior areas, whichever is later, except for the following:
    i. Lighting used for entry and exit points of a structure, parking areas, driveways and driveway ingress/egress points; or
    ii. Lighting activated by a motion sensor that extinguishes no later than five minutes after activation.
- **Visual obstruction of mountains and Mojave River:** See **Draft EIR Section 5.1: Aesthetics** page 5.1-25 concerning potential adverse effects on a scenic vista. As discussed in **Draft EIR Impact 5.1-1** (page 5.1-25), the Countywide Plan nor the proposed General Plan designate any scenic vistas that involve or are near the BIG Aesthetics study area, including the three identified landscape units. Because there are no scenic vistas in the BIG Aesthetics study area, BIG would not have an adverse effect on a scenic vista. Therefore, no impact would occur, and no mitigation is required. **Draft EIR Impact 5.1-2**

(page 5.1-27) provides analysis concerning any potential impacts to scenic resources including trees, rock outcroppings, and historic buildings within a state scenic highway. It is mentioned that there are no notable trees or rock outcroppings within or near the BIG Specific Plan area. Therefore, BIG would not substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a State Scenic Highway, and a less than significant impact would occur.

- **Industrialization of a rural residential setting:** The impacts associated with industrialization of the BIG footprint are analyzed in **Draft EIR Sections 5.1** through **5.17**. **Draft EIR Section 5.11 Land Use and Planning. Draft EIR Table 5.11-10** and **Draft EIR Table 5.11-11** shows that BIG operations would not conflict with the relevant proposed General Plan policies or Barstow Code standards adopted for the purposes of avoiding or reducing environmental impacts. Further, page 5.11-49 states that no existing established communities would be divided by BIG's on-site and off-site improvements, thus, BIG would not create any new barrier between communities or physically divide an established community. Although there is new industrial development proposed as part of BIG, the proposed development is compliant from a land-use perspective and would not disrupt existing rural communities from a land-use perspective.
- **Solar farm glare:** See **Draft EIR Appendix 5.1 BIG 2: Solar Farm Glare Study** concerning potential impacts associated with solar farm glare.

I1687-12 See **Response I1687-11** concerning potential aesthetic impacts to the Sylvan Community. Though the commenter is correct that there are no visual simulations from Sylvan Avenue, thorough analysis pertaining to potential visual impacts to the Sylvan Community was conducted and discussed in **Draft EIR Impacts 5.1-1** through **5.1-4** on pages 5.1-24 to 5.1-75. As previously discussed, the Sylvan Community is included in the study area associated with **Draft EIR Section 5.1 Aesthetics.** Additionally, see **Response I1676-6.**

I1687-13

- **Outdated surveys:** See **Draft EIR Section 5.4 Biological Resources.** As discussed on Draft EIR page 5.4-15, Biologists conducted vegetation mapping, general biological surveys, and habitat assessments for special status plants and wildlife within the BIG footprint between November 2018 and July 2025; see **Draft EIR Appendix 5.4 BIG-1**. Additionally, Various protocol-level presence/absence surveys have been conducted on the BIG footprint from 2021 to 2025; see **Draft EIR Appendix 5.4 BIG-1 Table 6: Summary of Surveys Conducted** (page 32). In general, most of the BIG footprint has been surveyed at least twice since 2021.
- **Incomplete access:** See **Response I1678-5.**
- **Off-season observations:** See **Response I1678-5.**
- **Wildlife movement disruption:** See **Draft EIR Section 5.4: Biological Resources.** As discussed on Draft EIR page 5.4-2, to address potential disruptions, BIG includes a wildlife corridor crossing under the proposed western lead tracks to maintain wildlife movement.

Measures such as permanent fencing and reduced nighttime lighting would help minimize ongoing operational impacts to wildlife.

- **Predator-prey imbalance:** See **Response O24-45**. Potential impacts to the balance between predator and prey are addressed throughout **Draft EIR Section 5.4 Biological Resources**, as well as in the BRTR. As discussed, predator subsidies are addressed in the BRTR and Draft EIR mitigation measure **MM BIG BIO-15** and would be mitigated by the Raven Management Plan. With the implementation of the above mitigation measures, as well as numerous construction best practices required by **MM BIG BIO-1** through **MM BIG BIO-12**, clearance surveys and fencing per **MM BIG BIO-13**, and compensatory preservation, impacts would be less than significant.
- **Nocturnal species impacts:** See **Draft EIR Section 5.4: Biological Resources** for analysis on potential nighttime lighting impacts to nocturnal species. As discussed throughout **Section 5.4**, operations may disrupt nearby breeding individuals and burrows (Draft EIR page 5.4-85). As discussed on Draft EIR page 5.4-2, measures such as reduced nighttime lighting would help minimize ongoing operational impacts to wildlife. **MM BIG BIO-36 Nighttime Lighting During Operations** would help reduce potential impacts to wildlife by implementing measures such as shielding and cutoff of lights, use of warm lighting, downward facing lighting fixtures to avoid light trespass, and limiting pole-mounted and building-mounted lighting fixtures to no more than 50 feet in height (Draft EIR page 5.4-95). Nocturnal species are included in **Draft EIR Section 5.4** and listed on **Draft EIR Table 5.4-9: Special-Status Wildlife Species with Potential to Occur Within the BIG Footprint** (**pages 5.4-36** through **5.4-42**). Furthermore, mitigation measure **MM BIG BIO-8: Nighttime Work and Lighting** (**page 5.4-73**) would help reduce potential impacts to nocturnal species during construction by implementing a Nighttime Construction and Lighting Plan.
- **Habitat fragmentation:** The Draft EIR evaluates direct, indirect, and cumulative impacts on wildlife movement and connectivity for both the BIG footprint and the surrounding landscape in **Draft EIR Appendix 5.4 BIG-1: Biological Resources Technical Report Section 5 Wildlife Corridor Impacts**. Impacts were assessed for key species present in the BIG footprint, including desert tortoise, Mojave fringe-toed lizard, bobcat, coyote, American badger, and desert kit fox. The analysis concludes that, with implementation of mitigation measures, direct, indirect, and cumulative impacts on wildlife movement and connectivity for these species would be reduced to a less-than-significant level. The Draft EIR and BRTR provide substantial evidence supporting these conclusions and demonstrate that project BIG's contribution to cumulative habitat fragmentation and connectivity impacts is adequately mitigated. The Draft EIR, supported by a 12-month wildlife movement study and revised mitigation measures, satisfies CEQA's requirements for analysis and mitigation of wildlife connectivity impacts.
- **Cumulative ecological effects:** See **Draft EIR Section 6.0 Cumulative Impacts**, page 6-31 concerning the analysis of cumulative biological effects.

I1687-14 This comment is acknowledged. See **Draft EIR Section 5.4 Biological Resources** concerning potential impacts to plants and wildlife.

I1687-15

- **Cultural landscape integrity**: See **Consolidated Response 09-09** concerning consideration of Sylvan Community cultural resources.
- **Setting, feeling, and association:** This comment is vague and is not a required component of analysis under State CEQA Guidelines.
- **Centennial-year significance:** This comment is vague and is not a required component of analysis under State CEQA Guidelines. See **Consolidated Response 09-09** concerning consideration of Sylvan Community cultural resources**.**
- **Impacts to pedestrian and bicycle travelers:** See **Draft EIR Impact 5.15-1** pages 5.15-57 through 5.15-60 for a discussion on potential impacts to transit, roadway, bicycle, and pedestrian facilities. **Table 5.15-15** notes the planned bicycle facilities along BIG's Specific Plan area frontage, along with BIG's proposed improvements, and the analysis conclusion. BIG would result in a less than significant impact in this regard, and no mitigation is required.

I1687-16 See **Response I1680-11**.

I1687-17

- **Private wells**: See **Draft EIR Section 6.0 Cumulative Impacts** (page 6-40: Hydrology and Water Quality). Additionally, see **Consolidated Response 09-07** concerning consideration of impacts to Sylvan Community private water wells.
- **Air quality:** See **Draft EIR Section 6.0 Cumulative Impacts**. Concerning cumulative air quality impacts, See Draft EIR page 6-16. Based on the potential air quality impacts associated with BIG, despite mitigation, BIG would result in a cumulatively considerable contribution of TACs emissions and combined effects of BIG and applicable cumulative projects would be a significant and unavoidable cumulative impact. Additional mitigation was analyzed and deemed infeasible, as described in **Draft EIR Section 5.3**. See **Consolidated Response 02** concerning significant and unavoidable impacts and the Statement of Overriding Considerations
- **Noise:** See **Draft EIR Section 6.0: Cumulative Impacts**. Concerning cumulative noise impacts, See Draft EIR page 6-41. Additionally, see **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses.
- **Health:** See **Draft EIR Section 6.0: Cumulative Impacts** concerning cumulative impacts (page 6-25, Cumulative TACs/Health Risks. Additionally, see **Consolidated Response 09-06** concerning consideration of cumulative impacts to the Sylvan Community and **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis.
- **Grid reliability:** See **Response I1686-20.**

- **Environmental justice:** Environmental justice is not a required component of analysis under State CEQA Guidelines and therefore is not analyzed in the Draft EIR.

I1687-18 See **Consolidated Response 03** concerning recirculation of the Draft EIR. As discussed in **Responses I1690-2** through **I1690-12**, the Draft EIR has not omitted analysis of potential impacts to the Sylvan Community. Therefore, neither subsequent review nor recirculation have been triggered.

I1687-19 See **Consolidated Response 06-01** concerning the geographic scope of the environmental analysis and definition of study area, and **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor.

I1687-20 See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses, see **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis, see **Consolidated Response 09-04** concerning consideration of the Sylvan Community in the Hydrology and Water Quality analyses, and see **Consolidated Response 09-05** concerning consideration of the Sylvan Community in the lighting analysis.

I1687-21 See **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis. Please also see **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses, **Consolidated Response 09-04** concerning consideration of the Sylvan Community in the Hydrology and Water Quality analyses, and **Consolidated Response 09-05** concerning consideration of the Sylvan Community in the lighting analysis.

I1687-22 See **Consolidated Response 09-10** concerning consideration of the Sylvan Community in the Hazardous Materials analysis, including arsenic levels/mobilization, and **Consolidated Response 09-04** concerning consideration of the Sylvan Community in the Hydrology and Water Quality analyses.

I1687-23 See **Consolidated Response 05** concerning feasible and enforceable mitigation.

I1687-24 Public Resources Code § 21081.6 requires that all public agencies establish monitoring/ reporting procedures for mitigation adopted as conditions of approval in order to mitigate or avoid significant environmental impacts. As required by Public Resources Code § 21081.6, the City of Barstow would develop an MMRP to provide a vehicle by which to monitor the mitigation measures (MMs) applicable to BIG. The City of Barstow, as the Lead Agency for the Project, would be responsible for ensuring MMRP implementation.

I1687-25 See **Consolidated Response 06-02** concerning the role of social and economic issues under CEQA.

I1687-26 This comment is acknowledged. Public engagement is a vital part of the CEQA process. The BIG Draft EIR was prepared in accordance with State CEQA Guidelines. This comment does not raise any environmental concerns about the adequacy of the Draft EIR. As such, no further response is necessary.

COMMENT LETTER I1688

I1688

BIG

Greg Hudson <ghudson@Lifetimesi.com>

Wed 1/7/2026 3:21 PM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

[NOTICE: THIS IS AN EXTERNAL EMAIL]
Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!

Caution! This message was sent from outside your organization.

To Whom That May Hear,

I am a resident of Silver Lakes and a business owner that services this area from Victorville. The Sante Fe expansion in Barstow will have a devastating effect on our community without consideration to the rail crossing that enters and exits our place of residence. It is misleading **at the least** for anyone to say that BIG will not increase rail traffic through Helendale. As a business owner, it would not be a remote thought to spend billions of dollars on a project that did not increase my business. For Sante Fe that would obviously be an increase in rail traffic; especially if that were to go along with their claim of elimination of massive reduction in truck traffic on Inerstate15. Please!! Let's deal truthfully when evaluating the effects of this project on our community. Lives will be at stake with delays in emergency access, people will lose jobs not getting to work on time, homes will be severely damaged by businesses not being able to respond in a timely manner. Plus, the fact that thousands of people will be greatly inconvenienced so that a giant corporation can be more profitable at our expense. Santa Fe and the County of San Bernardino need to be responsible for providing a bridge in and out of Silver Lakes, we should not be victims of corporate expansion and the tax revenues brought into the county. Get us a crossing but not at our expense!

I1688-1

RESPONSE TO COMMENT LETTER I1688, GREG HUDSON

I1688-1 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings; **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings; **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings; **Consolidated Response 05** concerning feasible and enforceable mitigation; and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

COMMENT LETTER I1689

BIG

I1689

Greg Hudson <hudsonbrenda@msn.com>

Wed 1/7/2026 3:42 PM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

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Caution! This message was sent from outside your organization.

To Whom it Concerns:

This letter of concern is regarding the (BIG) project. Myself along with many other residents of the Silver Lakes Community find it absolutely outrageous that the Barstow Impact Report did not take our community into consideration! We are a thriving community with a Federal Post Office, Fire Dept./ Paramedics, Schools , City of Barstow /Victorville Bus Stop along with Businesses that depend on having timely access across the railroad tracks!!! As it is Santa Fe is making the trains longer and our wait times currently are much longer than in the past. It is detrimental to the functioning of the citizens living here, along with others just trying to enter the community that we are provided with access across the train tracks. To say that this expansion will not increase the train traffic is beyond naive and bordering on lies!! Santa Fe is a business that would not be spending billions of dollars if it was not going to vastly increase their revenue, meaning more trains carrying goods!! Due to the size and scope of the community I cannot fathom how Santa Fe, once again with all the money they will make from this project, is not required to give us a bridge!

I1689-1

Sincerely,
Brenda Hudson

RESPONSE TO COMMENT LETTER I1689, BRENDA HUDSON

I1689-1 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings; **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings; **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings; **Consolidated Response 05** concerning feasible and enforceable mitigation; and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

RESPONSES TO SYLVAN AVENUE COMMUNITY FORM LETTER

The comment letters listed in the table below are concerning the Sylvan Community. As the letters raised the same issues, a single response to the comments has been provided. In the table below, the letter number is followed by the commenter's name. In instances where the name was not legible or missing, the commenter's name is included as "Public Comment." The letters listed in the table below can all be found posted on the City's website at: https://www.barstowca.org/departments/community-development-department/planning/general-plan-update. As these comment letters repeatedly utilized a similar letter that raised the same issues, the responses applicable to all these comment letters have been provided in the first of these letters, I1690, Public Commenter 423, in the following pages.

I1690	Public Commenter 423
I1692	Raylee Griego
I1693	Warren Wallis
I1694	Sherry Baily
I1699	Steve Hasko
I1700	Judy Hasko
I1770	Amy Violette
I1879	Mart Family
I1880	Michael Brown
I1889	Sherry Baily
I1896	Aaron and Crystal Heldreth

COMMENT LETTER I1690

I1690

Fw: Sylvan Ave Community Sign on Letter

angels4mel@aol.com

Wed 1/7/2026 6:50 PM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

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SYLVAN AVENUE COMMUNITY STATEMENT
For Submission to the City of Barstow, BNSF Railway, and Responsible Agencies
January 2026
We, the residents of the Sylvan Avenue Community, submit this statement to formally assert our presence, our rights, and our deep concern regarding the Draft Environmental Impact Report (DEIR) for the Barstow International Gateway (BIG) project. We are a long-established rural residential neighborhood located directly adjacent to the proposed project footprint. Our community includes Sylvan Avenue, Amaryllis, Ivy, Prairie, Gazana, Osage, and Spinet Streets. Many of us have lived here for decades. Some of our families have lived here for generations. We are homeowners, parents, grandparents, veterans, small business owners, and stewards of the Mojave Desert landscape.

I1690-1

We are not vacant land.
We are not an afterthought.
We are a community.

1. We Were Omitted From the DEIR — This Is Not Acceptable
Despite our proximity to the project, the DEIR does not identify the Sylvan Avenue Community as a sensitive receptor. It does not model noise, vibration, air quality, hydrology, lighting, or cumulative impacts for our homes. It does not analyze our private wells, our outdoor living spaces, our wildlife corridors, or our cultural landscape along Route 66.
This omission is a fundamental CEQA failure.
It prevents meaningful public review.
It conceals the true extent of environmental harm.
It leaves our community unprotected.
We request immediate correction and full inclusion of our neighborhood in all environmental analyses.

I1690-2

2. We Are a Rural Residential Community With a Distinct Way of Life
Our homes are intentionally located on spacious parcels. We rely on:
· Outdoor living
· Quiet nights
· Dark skies
· Wildlife habitat
· Private domestic wells
· Rural roadways
· The cultural experience of Route 66
These are not luxuries. They are the foundation of our health, our safety, and our daily lives.
The DEIR does not analyze how a 24-hour industrial megaproject will affect our:
· Sleep
· Stress levels
· Water quality
· Air quality

I1690-3

I1690-4

· Property values
· Safety
· Wildlife
· Cultural landscape
· Ability to live outdoors
· Ability to raise livestock
· Ability to remain in our homes
This is not a complete environmental review. I1690-4 cont'd

3. We Are Already Experiencing Environmental Vulnerabilities
Many of our homes rely on shallow private wells. Several wells in our community already show elevated arsenic levels. Some residents, including those with autoimmune or respiratory conditions, are medically vulnerable to air pollution, noise, and water contamination. I1690-5

The DEIR does not analyze:
· Arsenic mobilization
· Recharge basin impacts
· Groundwater contamination pathways
· Diesel particulate matter exposure
· Sleep disturbance
· Health risks
This is a serious omission that places our community at risk. I1690-6

4. We Request Full CEQA Compliance and Community Protection
We respectfully request that the City of Barstow and BNSF:

1. Identify the Sylvan Avenue Community as a sensitive receptor in all environmental analyses. I1690-7

2. Conduct parcel-specific modeling for noise, vibration, air quality, hydrology, and lighting. I1690-8

3. Analyze impacts to private domestic wells, including arsenic mobilization and recharge reduction. I1690-9

4. Prepare a cumulative health risk assessment for diesel, PM2.5, noise, groundwater, and lighting. I1690-10

5. Develop feasible, enforceable mitigation measures tailored to our community. I1690-11

6. Recirculate the DEIR due to significant omissions and new information. I1690-12

7. Establish a community oversight and monitoring program with resident participation. I1690-13

8. Provide relocation assistance or property acquisition options if impacts remain significant and unavoidable. I1690-14

We are not asking for special treatment.

We are asking for equal protection, accurate analysis, and a fair process.

5. We Stand Together
The Sylvan Avenue Community is united in our request for transparency, accountability, and meaningful environmental review. We are committed to working constructively with the City, BNSF, and all agencies involved — but we will not accept an EIR that excludes us, misrepresents our community, or fails to protect our health and safety. I1690-15

We respectfully request written responses to our concerns and full inclusion in all future project considerations.

Signed,
The Residents of the Sylvan Avenue Community, each & everyone of us in this community wish for these issues to be addressed, thank you!

RESPONSE TO COMMENT LETTER I1690, PUBLIC COMMENTER 423

I1690-1 See **Consolidated Response 04** concerning general non-CEQA issues.

I1690-2 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community, and the following:

- Omission of Community from Draft EIR: See **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor.
- Community identified as a sensitive receptor: See **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor.
- Noise and vibration: See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses.
- Air quality: See **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis.
- Hydrology: See **Consolidated Response 09-04** concerning consideration of the Sylvan Community in the Hydrology and Water Quality analyses.
- Lighting: See **Consolidated Response 09-05** concerning consideration of the Sylvan Community in the lighting analysis.
- Cumulative impacts: See **Consolidated Response 09-06** concerning consideration of cumulative impacts to the Sylvan Community.
- Private water wells: See **Consolidated Response 09-07** concerning consideration of impacts to the Sylvan Community private water wells.
- Outdoor living spaces: See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the noise and vibration analyses, and **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the air quality analysis.
- Community wildlife corridors: See **Consolidated Response 09-08** concerning consideration of Sylvan Community biological resources.
- Cultural landscape along Route 66: See **Consolidated Response 09-09** concerning consideration of Sylvan Community cultural resources.
- Public review: See **Consolidated Response 01-02** concerning the Draft EIR public review period.

I1690-3 See **Consolidated Response 04** concerning general non-CEQA issues.

I1690-4 For the issues raised in this comment, see **Consolidated Response 06** concerning BIG's potential impacts on communities, **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community, as follows:

- Sleep and stress levels: see **Consolidated Response 09-02** concerning consideration of the

Sylvan Community in the Noise and Vibration analyses.

- Water quality: see **Consolidated Response 09-04** concerning consideration of the Sylvan Community in the Hydrology and Water Quality analyses.
- Air quality: see **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis.
- Property values: see **Consolidated Response 04** concerning general non-CEQA issues, **Consolidated Response 06-02** concerning the role of social and economic issues under CEQA, and **Consolidated Response 06-05** concerning decreased property values.
- Safety: see **Consolidated Response 04** concerning general non-CEQA issues, **Consolidated Response 06-02** concerning the role of social and economic issues under CEQA, and **Consolidated Response 06-03** concerning community safety.
- Wildlife: see **Consolidated Response 09-08** concerning consideration of Sylvan Community biological resources.
- Cultural landscape: see **Consolidated Response 09-09** concerning consideration of Sylvan Community cultural resources.
- Ability to live outdoors: see **Consolidated Response 06-04** concerning quality of life.
- Ability to raise livestock: see **Consolidated Response 06-04** concerning quality of life.
- Ability to remain in our homes: see **Consolidated Response 06-04** concerning quality of life.

I1690-5 This comment identifies conditions the Community is already experiencing. However, State CEQA Guidelines § 15126.2 specifies that an EIR shall identify and focus on the significant effects of the proposed project on the environment. In assessing the impact of a proposed project on the environment, the lead agency should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the Notice of Preparation is published. As such, the Draft EIR is not required to analyze conditions that the Sylvan Community is already experiencing.

I1690-6 For the issues raised in this comment, see **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community, and the following:

- Arsenic mobilization: see **Consolidated Response 09-10** concerning consideration of the Sylvan Community in the Hazardous Materials analysis, including arsenic levels/ mobilization.
- Recharge basin impacts: see **Consolidated Response 09-07** concerning consideration of impacts to Sylvan Community private water wells, including potential impacts to water supply.
- Groundwater contamination pathways: see **Consolidated Response 09-04** concerning consideration of the Sylvan Community in the Hydrology and Water Quality analyses.

- Diesel particulate matter exposure: see **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis.
- Sleep disturbance: see **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses.
- Health risks: see **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis.

I1690-7 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor**,** and **Consolidated Response 06-01** concerning the geographic scope of the environmental analysis and definition of study area.

I1690-8 For the issues raised in this comment, see **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community and the following:

- Noise and vibration: see **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses.
- Air quality: see **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis.
- Hydrology: see **Consolidated Response 09-04** concerning consideration of the Sylvan Community in the Hydrology and Water Quality analyses.
- Lighting: see **Consolidated Response 09-05** concerning consideration of the Sylvan Community in the lighting analysis.

I1690-9 See **Consolidated Response 09-07** concerning consideration of impacts to Sylvan Community private water wells.

I1690-10 For the issues raised in this comment, see **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community and the following:

- Diesel and PM2.5: see **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis.
- Noise: see **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses.
- Groundwater: see **Consolidated Response 09-04** concerning consideration of the Sylvan Community in the Hydrology and Water Quality analyses**.**
- Lighting: see **Consolidated Response 09-05** concerning consideration of the Sylvan Community in the lighting analysis.

I1690-11 See **Consolidated Response 05** concerning feasible and enforceable mitigation.

I1690-12 See **Consolidated Response 06-02** concerning the role of social and economic issues under CEQA**.**

I1690-13 The City of Barstow would be responsible for oversight and monitoring the MMRP; see **Consolidated Response 05** concerning feasible and enforceable mitigation and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1690-14 See **Consolidated Response 03** concerning recirculation of the Draft EIR.

I1690-15 See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER I1691

I1691

Supplemental CEQA Comment - Preservation of Legal Issues (BIG Project Draft EIR)

Mart Family <deemart43@yahoo.com>

Thu 1/8/2026 12:10 AM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

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Subject: Supplemental CEQA Comment – Preservation of Legal Issues (BIG Project Draft EIR)

To the City of Barstow,

I submit this supplemental comment to preserve legal issues under the California Environmental Quality Act (CEQA) related to the Draft Environmental Impact Report (EIR) for the Barstow International Gateway (BIG) Project. I1691-1

The Draft EIR is legally inadequate for the following reasons:

1. **Failure to Adequately Analyze Cumulative Impacts**
   The EIR improperly segments analysis of air quality, health risk, noise, vibration, traffic, and lighting impacts. It fails to meaningfully evaluate cumulative impacts on the Sylvan Avenue residential community resulting from the combined effects of existing rail operations, interstate traffic, regional logistics development, and the proposed BIG Project. This violates CEQA's requirement for full disclosure of cumulative environmental effects. I1691-2

2. **Environmental Justice Deficiencies**
   While the EIR acknowledges disadvantaged and environmental justice communities, it fails to provide enforceable mitigation measures or alternatives that would avoid or substantially reduce disproportionate impacts to the Sylvan Avenue neighborhood. Identifying an environmental justice community without mitigation renders the analysis legally deficient. I1691-3

3. **Improper Reliance on "Less Than Significant with Mitigation" Conclusions**
   The EIR relies on vague, deferred, and unenforceable mitigation measures, including future studies and monitoring plans without performance standards or enforcement mechanisms. CEQA does not allow deferred mitigation where impacts are known and substantial. I1691-4

4. **Failure to Analyze Reasonable Project Alternatives**
   The EIR fails to analyze feasible alternatives that would reduce or avoid impacts to nearby residential communities, including reduced-intensity operations, expanded buffer zones, or residential acquisition/relocation options. The dismissal of these alternatives is unsupported by substantial evidence. I1691-5

5. **Failure to Consider Property Acquisition and Relocation as Mitigation**
   Where impacts remain significant and unavoidable, CEQA recognizes property acquisition and relocation assistance as legitimate mitigation. The EIR fails to analyze or include such measures despite acknowledging long-term impacts to off-site residential receptors. I1691-6

For these reasons, the Draft EIR fails to comply with CEQA and must be revised and recirculated prior to certification.

RESPONSES TO COMMENT LETTER I1691, MART FAMILY

I1691-1 This comment is introductory to the comments that follow. See **Consolidated Response 04** concerning general non-CEQA issues.

I1691-2 See **Consolidated Response 09-06** consideration of cumulative impacts to the Sylvan Community. The issues raised in this comment are also found in the following **Draft EIR Section 5.12 Noise and Vibration** concerning noise and vibration, **Draft EIR Section 5.3: Air Quality** concerning air quality and health risk, **Draft EIR Section 5.1: Aesthetics** concerning lighting, and **Draft EIR Section 6.0: Cumulative Impacts** concerning cumulative impacts**.**

I1691-3 Environmental justice is not a required point of analysis under State CEQA Guidelines. See **Consolidated Response 04** concerning general non-CEQA issues. See **Response I1691-2, Consolidated Response 09**, and **Draft EIR Section 5.3: Air Quality** concerning BIG's potential effects on the Sylvan Community.

I1691-4 The comment asserts that the Draft EIR relies on vague, deferred, and unenforceable mitigation measures, but does not provide specific details as to which mitigation measures were not adequate, nor does it provide evidence to support the claims. As noted in **Consolidated Response 04-01** concerning the scope of CEQA, commenters are advised to support assertions that the lead agency should conduct additional analysis or review with data or other factual references. This is because the lead agency's CEQA conclusion must be based on substantial evidence in the record and not speculation. Here, the commenter has not pointed to any facts or data that support its contention that the DEIR's analysis is flawed. Nonetheless, in addressing commenters' concerns, the Draft EIR proposed feasible mitigation measures where impacts were determined to be potentially significant. Further, the City as the Lead Agency would be required to prepare and enforce a Mitigation Monitoring and Reporting Program, which lists all mitigation measures identified in the Draft EIR to reduce potentially significant impacts in detail, as well as the timing of implementation of each mitigation measure, monitoring and reporting methods, responsible monitors, and verification of completion. Therefore, the claim that the Draft EIR relies on vague, deferred, and unenforceable mitigation measures is false. No further response is warranted.

I1691-5 See **Consolidated Response 09-11** concerning consideration of alternatives to minimize impacts to the Sylvan Community.

I1691-6 See **Consolidated Response 05** concerning feasible and enforceable mitigation and **Consolidated Response 03** concerning recirculation of the Draft EIR.

COMMENT LETTER I1695

I1695

Subject: Request for Additional Study, Disclosure, and Recirculation for All DEIR Chapters Not Addressed in My Prior Comments

January 8, 2026

To the City of Barstow and Responsible Agencies:

Due to the size, complexity, and technical nature of the Draft Environmental Impact Report (DEIR) for the Barstow International Gateway project, I was not able to review every chapter in full. I am submitting this comment to ensure that all remaining chapters, sections, and appendices are included in the public record of my concerns.

I1695-1

Based on the extensive deficiencies I identified in the chapters I *was* able to review — including omissions of sensitive receptors, lack of parcel- specific analysis, internal inconsistencies, incomplete baselines, and failure to analyze impacts to the Sylvan Avenue Community — I have reason to believe that similar deficiencies may exist throughout the remaining DEIR chapters.

Therefore, I respectfully request the following:

1. **That the City conduct further study and provide additional disclosure for all DEIR chapters I was unable to review**, including but not limited to:
   – Land Use
   – Greenhouse Gases
   – Hazards & Hazardous Materials
   – Transportation
   – Public Services
   – Utilities & Service Systems
   – Tribal Cultural Resources
   – Geology & Soils
   – Recreation
   – Population & Housing
   – Mineral Resources
   – Wildfire
   – Any appendices or technical reports not addressed in my prior comments

   I1695-2
2. **That the City treat this comment as a formal request for recirculation** under CEQA §15088.5, due to the likelihood that significant new information, omissions, or analytical errors exist in the chapters not reviewed.

   I1695-3
3. **That the City acknowledge that the Sylvan Avenue Community is a sensitive receptor** whose omission affects *every* environmental topic area, not just the chapters I commented on individually.

   I1695-4
4. **That the City provide written responses to this comment**, including clarification of how the DEIR evaluated impacts to the Sylvan Avenue Community in all chapters not addressed in my prior submissions.

   I1695-5
5. **That the City confirm that my right to comment on any new information or revised analysis is preserved**, especially if the DEIR is recirculated or supplemented with more than minimal open review and comment period.

   I1695-6

My inability to review every chapter does not diminish the need for full disclosure, accurate analysis, and meaningful mitigation for the community most directly affected by this project. I respectfully request that the City ensure that all environmental topics receive complete, transparent, and community- centered evaluation. I1695-7

Respectfully submitted,

Sherry Baily
Sylvan Avenue Community

RESPONSE TO COMMENT LETTER I1695, SHERRY BAILY

I1695-1 The comment is noted. All comments submitted to the City of Barstow by the January 12th public review deadline have been included in the record. See **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community.

I1695-2 All Draft EIR sections and appendices are available at www.barstowca.org. See **Consolidated Response 01-02** concerning the Draft EIR public review period.

I1695-3 See **Consolidated Response 03** concerning recirculation of the Draft EIR.

I1695-4 See **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor

I1695-5 Pursuant to State CEQA Guidelines § 15088, the lead agency is required to evaluate and respond to comments on the Draft EIR that are submitted during the Draft EIR public review period. See **Consolidated Response 01-02** concerning the Draft EIR public review period. Concerning the evaluation of impacts to the Sylvan Avenue community, see **Consolidated Response 06-01** concerning the geographic scope of the environmental analysis and definition of a study area, which includes the Sylvan Community.

I1695-6 Pursuant to State CEQA Guidelines § 15089, lead agencies may provide an opportunity for review of the Final EIR by the public or by commenting agencies before approving the Project. The review of a Final EIR should focus on the responses to comments on the Draft EIR. Further, pursuant to State CEQA Guidelines § 15088.5, in the event that an EIR is recirculated prior to certification, as part of providing notice of recirculation as required by Public Resources Code § 21092.1, the lead agency shall send a notice of recirculation to every agency, person, or organization that commented on the prior EIR. The notice shall indicate, at a minimum, whether new comments may be submitted only on the recirculated portions of the EIR or on the entire EIR to be considered by the agency. See also **Consolidated Response 03** concerning recirculation of the Draft EIR.

I1695-7 Pursuant to State CEQA Guidelines § 15090, prior to approving a project, the lead agency (City of Barstow) shall certify that:

1. The final EIR has been completed in compliance with CEQA;
2. The final EIR was presented to the decision-making body of the lead agency, and that the decision-making body reviewed and considered the information contained in the final EIR prior to approving the project; and
3. The final EIR reflects the lead agency's independent judgment and analysis.

Further, pursuant to State CEQA Guidelines § 15092, a public agency shall not decide to approve or carry out a project for which an EIR was prepared unless either:

1. The project as approved will not have a significant effect on the environment, or
2. The agency has:
    a. Eliminated or substantially lessened all significant effects on the environment where feasible as shown in findings under Section 15091, and

b. Determined that any remaining significant effects on the environment found to be unavoidable under Section 15091 are acceptable due to overriding concerns as described in Section 15093.

Information on future public hearings and meetings related to the Project can be found on www.barstowca.org.

COMMENT LETTER I1696

I1696

January 8, 2026 Draft Environment Impact Response

Health and Saftety/Noise, Vibration, Enviromental Justice, Health Risk Assesment, Cumulative Considerations, and Summary

For HEALTH AND SAFETY

Situation: A year ago 11/2024, at a BNSF meeting - The Sylvan Ave and Country Club Communities spoke with BNSF TEAM - Lena Kent, Jeanette Hayhurst, Mike Lewis and Rich Dennison it was asked: Can we create an ordinance change regarding front fencing height from 4/6 foot, to create separation from view (solar field, BNSF rail yard, Industry)? I1696-1

The answer from County was NO.

11/10/2024 The EIR is released and states - mitigation of a Sound/Vibration Wall is not financially feasible for them due to the ratio of impact to cost. I1696-2

12/15/2025 County of San Bernardino (now) responds by email: I1696-3

Sherry,

Here is some information from Land Use on "how Sylvan community can construct walls taller than the standard maximum height of six feet."

1. Director's Determination or Variance A Director's Determination (or variance) may be requested to increase wall height for reasons related to public health and safety. A reasonable argument can be made that noise constitutes a health and safety concern that walls "provide for the mitigation of noise," which could support a taller wall for noise-mitigation purposes.
2. Adjacent Industrial Zoning Consideration If the adjacent zoning district is industrial, a solid masonry wall, at a minimum of six feet in height, may be constructed at the district boundary line." The section sets a minimum height but does not specify a maximum. Parcels in the Sylvan community zoned Rural Living (RL) and adjacent to "General Industrial" would be allowed to construct a taller wall.

QUESTION: Why is it okay for them to shift the weight of this responsibility onto us? I1696-4

City of Barstow, Planners, Environmental Justice and Agencies - THIS MATTERS.

The County's response improperly shifts CEQA-required mitigation onto private homeowners, which is neither lawful nor defensible. I1696-5

In 2024, residents were told that increasing front-fence height was not permitted and that no ordinance change was possible. I1696-6

Now, after the release of the EIR—which concludes that a sound/vibration wall is "not financially feasible" for the project proponent—the County suggests that I1696-7

residents may individually pursue a Director's Determination or variance "for health and safety" to construct their own taller walls. I1696-7 cont.

This abrupt reversal is not a mitigation measure; it is a transfer of responsibility. I1696-8

If noise and vibration constitute a health and safety concern, then the *project* must mitigate the impact—not the residents who are being harmed by it. I1696-9

CEQA does not allow agencies to reframe a significant environmental impact as a private property choice, nor to offload mitigation costs onto affected communities. I1696-10

The County's reliance on zoning allowances to justify homeowner- funded barriers is a clear attempt to avoid acknowledging a significant impact, avoid requiring feasible mitigation, and avoid recirculation. I1696-111

This burden- shifting violates CEQA's core principle that project impacts must be mitigated by the project proponent, not by the public. I1696-12

This reversal is not a mitigation measure; it is a transfer of responsibility from the project proponent to the impacted community.

If noise and vibration constitute a health and safety concern, then the project must mitigate the impact, not the residents who are subjected to it. I1696-13

This burden-shifting violates CEQA's core principle that project impacts must be mitigated by the project proponent—not by the public.

1. Noise Impacts: Failure to Provide Feasible Mitigation and Improper Deferral I1696-14

The Draft EIR's conclusion that a sound wall is "not financially feasible" for the project proponent is not supported by substantial evidence and does not satisfy CEQA's requirement to adopt all feasible mitigation measures.

Instead of requiring the project to implement effective noise mitigation, the County's subsequent suggestion that residents may individually construct taller walls through a variance process constitutes improper deferral and burden-shifting. I1696-15

CEQA requires the lead agency to identify, evaluate, and require feasible mitigation for significant noise impacts; it does not allow the agency to transfer that responsibility to private homeowners, particularly those living in the closest and most vulnerable structures. I1696-16

The Draft EIR fails to analyze parcel-specific noise exposure for the Sylvan Avenue community, fails to evaluate feasible project-level mitigation such as engineered sound/vibration barriers, and fails to provide enforceable performance standards. I1696-17

By directing residents to pursue their own walls, the County effectively acknowledges that noise impacts are significant and health-related, yet refuses to require the project to mitigate them. I1696-18

This approach is inconsistent with CEQA, unsupported by evidence, and leaves the most impacted community without meaningful protection. I1696-19

2. Vibration Impacts: Inadequate Mitigation, and Improper Reliance on Homeowner Action I1696-20

The Draft EIR similarly fails to provide adequate analysis or feasible mitigation for significant vibration impacts to the Sylvan Avenue community.

The document does not evaluate parcel-specific vibration exposure for modular homes—structures that are uniquely vulnerable to low-frequency vibration, structural resonance, and cumulative fatigue. I1696-21

Instead of requiring the project to implement engineered vibration-attenuation measures, the County's subsequent suggestion that residents may construct their own taller walls through a variance process is presented as a potential solution. I1696-22

This approach constitutes improper deferral and burden-shifting under CEQA. I1696-23

When an agency acknowledges that vibration poses a health and safety concern, the obligation to mitigate rests with the project proponent—not with individual homeowners who lack the technical capacity, financial resources, or legal responsibility to address project-generated impacts. I1696-24

The Draft EIR fails to evaluate feasible project-level vibration mitigation (including engineered barriers, track-bed treatments, or operational controls), fails to provide enforceable performance standards, and fails to protect the most vibration-sensitive structures in the project area. I1696-25

By directing residents toward self-funded construction that does not address the underlying impact, the County effectively concedes the significance of vibration impacts while refusing to require meaningful mitigation. I1696-26

This is inconsistent with CEQA and leaves the Sylvan Avenue community without protection from foreseeable and avoidable harm. I1696-27

3. Environmental Justice: Disproportionate Burden-Shifting and Failure to Protect the Most Impacted Community I1696-28

The County's approach to noise and vibration mitigation raises significant Environmental Justice concerns, as the burden-shifting described above disproportionately affects the Sylvan Avenue community—an existing, low-income, rural residential neighborhood located directly adjacent to the project site.

CEQA requires lead agencies to identify and address disproportionate impacts on vulnerable communities, yet the Draft EIR fails to analyze how directing residents to self-fund mitigation (through variances or private wall construction) compounds existing inequities. I1696-29

The County's suggestion that homeowners should individually pursue taller walls—after the EIR concludes that a project-funded sound/vibration barrier is "not financially feasible"—places the cost, responsibility, and technical burden of mitigation on the very community experiencing the highest exposure to noise, vibration, air pollution, lighting, and cumulative health risks. I1696-30

This is the opposite of equitable mitigation.

By declining to require feasible project-level protections and instead shifting responsibility to residents with limited resources, the County exacerbates environmental injustice and fails to meet CEQA's mandate to protect communities that are already disproportionately burdened by industrial activity. I1696-31

The Draft EIR must be revised to include a full Environmental Justice analysis that evaluates these inequities and requires project-level mitigation rather than homeowner-funded workarounds. I1696-32

4. Health Risk Assessment: Failure to Integrate Noise and Vibration Impacts Into Cumulative Health Burden

The Draft EIR's Health Risk Assessment (HRA) fails to account for the cumulative health burden created by the project's unmitigated noise and vibration impacts, particularly for the Sylvan Avenue community, which will be exposed to elevated levels of diesel particulate matter, operational emissions, and 24-hour industrial activity. I1696-33

CEQA requires that health risks be evaluated cumulatively and in context, yet the dEIR treats noise and vibration as isolated, non-health stressors, despite the County's own acknowledgment that noise constitutes a "health and safety" concern when directing residents toward self-funded wall construction. I1696-34

This inconsistency undermines the credibility of the HRA and results in an incomplete assessment of total health risk. I1696-35

Chronic noise exposure is associated with cardiovascular strain, sleep disturbance, cognitive impairment, and stress-related health outcomes, while low-frequency vibration can exacerbate structural resonance in modular homes and contribute to physiological stress. I1696-36

By failing to integrate these impacts into the cumulative health analysis—and by shifting mitigation responsibility onto residents—the Draft EIR underestimates the true health burden on the most vulnerable community.

Health Risk Assessment must incorporate noise and vibration as contributing health stressors, evaluate their interaction with air toxics and operational emissions, and require project-level mitigation rather than homeowner-funded measures. I1696-37

5. Cumulative Impacts: Failure to Integrate Noise, Vibration, Health Risk, and Environmental Justice Burdens I1696-38

The Draft EIR fails to provide a legally adequate cumulative impacts analysis because it does not integrate the combined effects of noise, vibration, air emissions, private water wells, operational activity, and environmental justice burdens on the Sylvan Avenue community. I1696-38 cont.

CEQA requires that cumulative impacts be evaluated in the context of existing conditions and the community's current exposure to industrial stressors, yet the document treats each impact category in isolation and omits any analysis of how these stressors interact. I1696-39

The County's subsequent suggestion that residents may individually construct taller walls through a variance process—after the EIR concludes that a project-funded sound/vibration barrier is "not financially feasible"—further demonstrates the inadequacy of the cumulative analysis. I1696-40

By shifting mitigation responsibility onto the most impacted and least resourced community, the County compounds cumulative harm rather than addressing it. I1696-41

The Draft EIR does not evaluate how chronic noise exposure, low-frequency vibration, diesel particulate matter, nighttime lighting, and 24-hour operations collectively affect health, safety, and quality of life. Nor does it assess how these combined impacts disproportionately burden a rural residential neighborhood located directly adjacent to the project site. I1696-42

A revised cumulative impacts analysis must integrate Noise, Vibration, Hydrology, Health Risk Assessment, and Environmental Justice findings, and must require project-level mitigation rather than homeowner-funded measures. I1696-43

I respectfully request that this be included into public comment, and responded to in writing to address my concerns and comments. I1696-44

Health, Homes, Quality of Life Matters,

Sherry Baily

Sylvan Ave Community

RESPONSES TO COMMENT LETTER I1696, SHERRY BAILY

I1696-1 See **Consolidated Response 04** concerning general non-CEQA issues.

I1696-2 See **Consolidated Response 04** concerning general non-CEQA issues.

I1696-3 As discussed in **Appendix 5.12 BIG-1: Barstow International Gateway Noise and Vibration Technical Report** (pages 108, 114, 120), for operational interior noise levels for Opening Year 2028, Interim Year 2033, and Horizon Year 2048, increased noise barrier heights for BAR-1 through BAR-4 were modeled in SoundPLAN to evaluate their effectiveness and determine whether they could reduce interior noise impacts at the affected receptors for the windows open condition. The modeling results indicate the increased barrier heights would not achieve a large enough reduction to bring interior noise levels below standards for the windows open condition, and thus, a potentially significant impact would occur. Other options to reduce interior noise levels for a windows open condition are limited, as upgraded windows are ineffective under such condition and BIG cannot willfully construct a noise barrier on a private property. Therefore, as there are no feasible interior noise abatement measures for a windows open condition, a significant and unavoidable impact would occur in this regard. It is noted that no impacts would occur for the windows closed condition.

It is noted that noise barriers BAR-1 and BAR-4 would exceed the maximum cost allowance per benefited receptor and would be considered financially infeasible and therefore, are excluded from the mitigated noise analysis in **Draft EIR Section 5.12: Noise**. It is also noted that BAR-2, a 10-foot-high absorptive noise barrier approximately 700 feet in length in the solar farm's northeastern portion, has been removed from MM NOI-2 as described in the Final EIR and MMRP, given that it was initially proposed for the sole and exclusive purpose of abating noise from the Battery Energy Storage System (BESS), which BIG does not now propose. See **Consolidated Response 16** concerning BESS and **Response I1683-3**, above, and **Final EIR Section 3.0: Errata to the Draft EIR** for proposed edits to the Draft EIR text concerning the BESS. Therefore, only two noise barriers (BAR-3 and BAR-5) remain as a financially feasible means of mitigating BIG's potentially significant noise impacts, and **Mitigation Measure MM BIG NOI-2: Noise Barriers** has been updated accordingly as shown in **Final EIR Section 3.0 Errata to the Draft EIR**.

I1696-4 See **Consolidated Response 04** concerning general non-CEQA issues.

I1696-5 through 1696-20 See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses and see **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor.

I1696-21 **Draft Impact 5.12-2** (pages 5.12-131 through 5.12-134) analyzed if BIG would result in generation of excessive groundborne vibration or groundborne noise levels. In the analysis, the vibration analysis included the nearest sensitive receptors based on Land Use Category type as determined by the FTA Noise and Vibration Impact Assessment Manual. The nearest off-site structure, a single-family dwelling unit is 165 feet from the center of the mainline tracks along the west lead track alignment. At this distance, and conservatively using a

maximum speed of 50 mph, vibration levels from train pass-bys would be approximately 73.44 VdB, which is below the 75 VdB ground-borne vibration impact level for Land Use Category 2. Further, the nearest Land Use Category 3 structure (Lenwood Elementary School) is approximately 600 feet from the proposed east lead track alignment. At this distance and maximum speed of 40 mph, the ground-borne vibration impact levels would be approximately 57.54 VdB, which would be below the FTA's 83 VdB ground-borne vibration impact level for Land Use Category 3 for infrequent events and 78 VdB threshold for occasional events. A parcel-specific vibration exposure analysis is not required. As such, the Draft EIR concluded BIG would result in a less than significant impacts with respect to ground-borne vibration and noise, and no mitigation is required.

I1696-22 See **Response I1696-21** concerning the ground-borne vibration and noise analysis.

I1696-23 See **Response I1696-21** concerning the ground-borne vibration and noise analysis.

I1696-24 See **Consolidated Response 04** concerning general non-CEQA issues.

I1696-25 See **Response I1696-21** concerning the ground-borne vibration and noise analysis.

I1696-26 See **Response I1696-21** concerning the ground-borne vibration and noise analysis.

I1696-27 See **Response I1696-21** concerning the ground-borne vibration and noise analysis.

I1696-28 See **Consolidated Response 04** concerning general non-CEQA issues.

I1696-29 **Draft EIR Section 5.12** provides an evaluation of BIG's potential construction and operational noise impacts. The Draft EIR determined that construction noise and operations would result in a significant and unavoidable impact, despite implementing all feasible mitigation measures. As discussed in **Draft EIR Appendix 5.12 BIG-1,** the Draft EIR completed a financial feasibility analysis to determine feasible mitigation measures to be implemented to reduce BIG's significant noise impacts. The proposed mitigation measures in the Draft EIR would be funded and implemented by the Project Applicant. Additionally, the City as Lead Agency would be required under CEQA to adopt an MMRP, which includes a list of all the required mitigation measures to be implemented as outlined in the Draft EIR. The MMRP helps track compliance and ensures all mitigation measures that are proposed to reduce significant impacts are implemented. Through the MMRP, the Lead Agency would be responsible for ensuring compliance with the Draft EIR mitigation measures, and the Project Applicant would be responsible for implementing the required mitigation measures. As such, the responsibility for the appropriate mitigation measures would not fall on the responsibility of the Sylvan community.

I1696-30 See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses.

I1696-31 See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses.

I1696-32 See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses.

I1696-33 See **Consolidated Response 09-06** concerning consideration of cumulative impacts to the Sylvan Community.

I1696-34 through I1696-40 See **Consolidated Response 09-06** concerning consideration of cumulative impacts to the Sylvan Community.

I1696-41 See **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 09-06** concerning consideration of cumulative impacts to the Sylvan community.

I1696-42 See **Consolidated Response 09-06** concerning consideration of cumulative impacts to the Sylvan community.

I1696-43 See **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 09-06** concerning consideration of cumulative impacts to the Sylvan Community.

I1696-44 See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER I1697

 I1697

BNSF Barstow International Gateway Railyard Project

Mariela Fuchs <marielafp2000@icloud.com>

Thu 1/8/2026 10:40 AM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

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Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!

Caution! This message was sent from outside your organization.

To whom it may concern,

Hope this message finds you well and please accept my comments as my personal concerns regarding the proposed Barstow BIG project.

As a resident of Silver Lakes/Helendale I am deeply concerned about the accessibility and overall safety of our community during the development of your project. This is a highly active, sympathetic, and welcoming community, home of several workers from diverse backgrounds including many active-duty military families like us, that need to commute long distances every day. It takes about 1 hour 10 min to drive from Silver Lakes to Fort Irwin and about 8-12 min or even more if stopped at the railroad crossing due to passing trains. There are no more exits or entries to this community making this railroad crossing itself a risk hazard. I1697-1

It is lamentable that this community was not taking into account during the DEIR in the same way the project did with the city of Barstow, where according to the project website "...measures were evaluated and implemented to mitigate community impact."

The project itself is amazing, and it will bring economic grow and prosperity to the region, but it's completely unfair to impact an entire community that already are dealing with extended delays and closures due to the railroad, without evaluating our particular situation and offering solutions, which in my personal opinion, can be the construction of a bridge that keep the exit/entrance fluid and your project ongoing. I1697-2

As a military spouse that knows how critical, especially for uniformed services members, is to being on time in their jobs, I respectfully ask you to please consider these concerns and work together for the benefit of all.

Thank you for any attention to this matter and sorry for any inconvenience this generates, I1697-3

Very respectfully,

Mariela F.

RESPONSE TO COMMENT LETTER I1697, MARIELA FUCHS

I1697-1 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings; **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings; **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings; **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings; and **Consolidated Response 06-03** concerning community safety.

I1697-2 See **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community and see **Consolidated Response 06-01** concerning the geographic scope of the environmental analysis and definition of study area.

I1697-3 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

COMMENT LETTER I1698

I1698

Comments,

Steve Hasko <sjhasko68@gmail.com>

Thu 1/8/2026 10:14 AM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

[NOTICE: THIS IS AN EXTERNAL EMAIL]
Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!

Caution! This message was sent from outside your organization.

We live on Gazana St. As of today our environment is a quiet country living style. Our nephew has ADHD and requires quiet surroundings. That is why we bought our retirement home in the country. Gazana St. is right in front of our home and my understanding is that Gazana St. will become a main highway from Victorville to Barstow. The traffic is going to be unbearable and upset our quality of life. We are not used to a lot of noise. The noise will affect our entire family, especially our nephew. More carbon dioxide from the traffic and BNSF will affect our lungs. The Air QUALITY WILL BE TOXIC. We are concerned about our property value going down, and also being annexed into Barstow. The vibration from the trains and traffic will redefine our quality of living. We the citizens and taxpayers who live on Gazana St. are important, rather our road is sparsely populated and underdeveloped ! That is why we moved here for the sake of quiet living, especially for our special needs nephew that can not stand a lot of noise. Our concerns, Gazana St. will be a busy noisy highway, air quality, property value, annexing into Barstow, vibration and water supply. Please consider our concerns as you make your decisions. Thank you, Steve and Judy Hasko and Michael

I1698-1

RESPONSES TO COMMENT LETTER I1698, STEVE HASKO

I1698-1 See **Consolidated Response 09** for responses to comments regarding specific impacts to the Sylvan community, specifically see **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor; **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses; **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis; and **Consolidated Response 09-04** concerning consideration of the Sylvan Community in the Hydrology and Water Quality analyses.

Draft EIR Section 5.15 Transportation provides an analysis of the potential transportation-related impacts associated with BIG construction and operations. No potentially significant transportation-related impacts were identified, and no improvements along Gazana Street are proposed as part of BIG implementation.

The impact evaluation for the Barstow General Plan component provides a program-level review of impacts due to potential growth in accordance with buildout of the City's land use plan. The analysis is intended to evaluate impacts at a broader, policy or planning scale. Implementation of the General Plan would not result in actionable project features, rather it provides a framework for responsible City growth for future individual projects and is intended to act as a guiding document in terms of noise and vibration issues, areas of concern, and strategies to reduce potential future impacts. Gazana Street is an existing secondary arterial street that is designated for potential redevelopment as a secondary arterial in the existing General Plan. As the road does not have all the necessary right-of-way, before any development as a secondary arterial can occur, the adjacent property owners would need to dedicate or sell right-of-way to construct the road. Due to the lack of right-of-way and projected growth, the traffic model considered future development of Gazana Street as a secondary arterial to be conceptual and included it only for connecting traffic analysis zones. The anticipated right-of-way width if Gazana Street were developed as a secondary arterial would be 84 feet. (Table CM-1 of the proposed Circulation and Mobility Element). While the potential for development of Gazana Street as a secondary arterial was not specifically discussed in the Draft EIR, redevelopment of this roadway as a secondary arterial was conservatively assumed in the traffic model and is projected to have up to 1,500 average daily vehicle trips by 2048.

At this Average Daily Traffic, the projected 65 dB noise level would be approximately 30 feet from the centerline and contained within the road right-of-way, which would extend 42 feet from the centerline. This level of noise is considered less than significant. See **Consolidated Response 06-04** on Quality of Life, please also see **Consolidated Response 06-05** that addresses changes in property values, and **Draft EIR Sections 5.10: Hydrology and Water Quality**, and **5.17: Utilities and Service Systems** on water supply. Vibration levels from heavy truck pass-bys typically do not cause vibration impacts because the vibration energy they generate is low in magnitude, short in duration, and rapidly attenuates with distance through soil and building foundations. Vibrations from heavy trucks are usually well below human perception thresholds and levels associated with annoyance or structural effects, especially

beyond the roadway edge, due to geometric spreading, soil damping, and the isolating effect of residential slab and framing systems.

With respect to air quality, **Draft EIR Section 5.3, *Air Quality***, provides a detailed analysis of the proposed BIG facility regional and localized air quality. The Draft EIR identifies that construction and operation of the BIG facility would result in significant and unavoidable impacts. Mitigation Measures BIG AQ-1 through BIG AQ-14 are required for the BIG facility to reduce and minimize to the maximum extent feasible. Section 5.3 of the Draft EIR further identifies measures considered but rejected due to infeasibility from technological or logistical conflicts. Nonetheless, as shown in Table 5.3-29 in the Draft EIR, with inclusion of mitigation, construction of the BIG facility would result in a localized exceedance of ambient air quality standards for the 24-hour PM10 standard. As shown in **Draft EIR Figure 5.3-5: Construction Mitigated 24-Hour PM10 Pollutant Concentration**, this exceedance would occur in a highly localized position near the intersection of Main Street and Castle Court where no homes are located. Moreover, as shown in **Draft EIR Table 5.3-31: Maximum Off-Site Concentration from Operations (Mitigated)** (pages 5.12-82 through 5.12-87), operation of the BIG facility would not result in an exceedance of any ambient air quality standard with mitigation incorporated during long-term operation. In addition, as shown in **Draft EIR Table 5.3-37: Carcinogenic Risk Assessment (Construction and Operations)** (pages 5.3-142 through 5.3-144), BIG would result in marginal reductions in cancer risk impacts to nearby residents and workers, and would result in a reduction in cancer risk at the maximally exposed individual resident by approximately 31 percent with mitigation incorporated during construction and operations.

As to potential impacts to public health, see **Consolidated Responses 07** and **09**.

COMMENT LETTER I1713

RECEIVED
JAN 0 5 2026

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

I1713

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I1713-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I1713-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I1713-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I1713-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I1713-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I1713-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I1713-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I1713-7 cont.

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I1713-8

Sincerely, John J. Golden Jr.

Signature: _____ (You can remain anonymous if you prefer.)
Print Name: JOHN J. Golden Jr.
Mailing Address: P.O. Box 3394
Helendale, CA 92342 Helendale Ca. 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

It will kill our real estate values. I1713-9

We need a Bridge at Vista Rd,

Jonson rd will Delay our Time In and Out of Town. Not exceptable. This will Choke off our Ability To move in and out of Helendale, our Ageing population for our city, Ambulance, Fire Trucks etc people will Die, Because of This. And I1713-10

What About Truck Traffic on National Trails Hwy. employee Traffic To And From Traffic for employees of BNSF I1713-11

RESPONSE TO COMMENT LETTER I1713, JOHN GOLDEN

I1713-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 06-04** concerning quality of life.

I1713-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I1713-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1713-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1713-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I1713-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1713-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale

Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at the Silver Lakes/Helendale Community at-grade crossings.

I1713-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1713-9 See **Consolidated Response 0602** concerning the role of social and economic issues under CEQA, **Consolidated Response 06-05** concerning decreased property values; **Consolidated Response 05** concerning feasible and enforceable mitigation; **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community; **and Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1713-10 See **Consolidated Response 06-03** concerning community safety; **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings; **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings; and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1713-11 BIG's traffic generation (i.e., trucks and employees) is discussed in *Barstow International Gateway Level of Service Assessment – Transportation Analysis* (found in **Draft EIR Appendix 5.15 BIG-2: Level of Service Assessment – Transportation Analysis**). BIG trip generation is addressed on **Draft EIR Appendix 5.15 BIG-2** beginning page 131 (Tables 28, 29, and 30. As indicated in these tables, BIG is forecast to generate approximately 10,213 ADT (passenger car equivalent (PCE) in Opening Year 2028, approximately 13,172 ADT (PCE) in Interim Year 2033, and approximately 15,268 ADT (PCE) in Horizon Year 2048. As discussed in **Consolidated Response 08-01**, automobile delay, as described solely by level of service (LOS) or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment under CEQA, except in any locations specifically identified in the new criteria. As such, the automobile delay due to increased traffic from BIG operations is not considered a significant impact on the environment under CEQA. As stated on Draft EIR page 5.15-59 and **Draft EIR Appendix 5.15 BIG-2**, BIG proposes several transportation modifications (TMs) to address the forecast operational deficiencies of intersections, roadway segments, and freeway off-ramps resulting from increased traffic due to BIG. Most BIG TMs

take the form of intersection modifications – signalization, restriping, or lane additions. All TMs would be designed to meet relevant agency standards.

COMMENT LETTER I1714

RECEIVED
JAN [illegible] 2026

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

I1714

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I1714-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I1714-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I1714-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I1714-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I1714-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I1714-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I1714-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I1714-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I1714-8

Sincerely,

Signature: Margaret Hall (You can remain anonymous if you prefer.)
Print Name: Margaret Hall
Mailing Address: 14933 Fireside Lane 2952
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

Traffic on Route 66 increasing especially with Diesel Commercial utilization. I1714-9

Toxic chemicals being transported near large population via trains I1714-10

Emergency services access major issue; delays in ambulance service I1714-11

Increase of air pollution I1714-12

RESPONSE TO COMMENT LETTER I1714, MARGARET HALL

I1714-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings accessibility, and **Consolidated Response 06-04** concerning quality of life.

I1714-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I1714-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1714-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1714-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I1714-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/ Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1714-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade

separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at the Silver Lakes/Helendale Community at-grade crossings.

I1714-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1714-9 See **Response I1713-11** above.

I1714-10 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including providing a disaster response plan to address potential spills, derailments, and other emergencies, and **Draft EIR Section 5.9: Hazards, Hazardous Materials, and Wildfire** (beginning page 5.9-99).

I1714-11 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings.

I1714-12 **Draft EIR Section 5.3: Air Quality** analyzes BIG's potential impacts on air quality (beginning page 5.3-76). **Draft EIR Appendix 5.3 BIG-1: Air Quality Technical Report** describes, in detail, the methodology for determining BIG's air quality impacts. See also **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community, **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor, and **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis.

COMMENT LETTER I1715

Snowmit Bx 1/5

BIG DEIR – Silver Lakes/Helendale I1715

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

RECEIVED
JAN 0 8 2026

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I1715-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I1715-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I1715-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I1715-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I1715-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I1715-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I1715-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I1715-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I1715-8

Sincerely,

Signature: Susan M. Foulkes (You can remain anonymous if you prefer.)
Print Name: Susan M. Foulkes
Mailing Address: P.O. Box 471, Helendale
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

Barstow is endangering Helendale residents by blocking access for Medical Issues – (blocking access to route 66 by lengthy trains – & stopping on track) I1715-9

RESPONSE TO COMMENT LETTER I1715, SUSAN FOULKES

I1715-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings accessibility, and **Consolidated Response 06-04** concerning quality of life.

I1715-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I1715-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1715-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1715-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I1715-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1715-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade

separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at the Silver Lakes/Helendale Community at-grade crossings.

I1715-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1715-9 See **Consolidated Response 06-03** concerning community safety; **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings; **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

COMMENT LETTER I1717

I1717

RECEIVED
JAN 0 8 2026

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I1717-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I1717-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I1717-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I1717-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I1717-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I1717-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I1717-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area.

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community.

Sincerely,

Signature: _____ (You can remain anonymous if you prefer.)
Print Name:
Mailing Address:
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

My concerns of changes:

- To provide a study on increase traffic on Route 66 currently/presently and to addres future T traffic on Shadow Mountain Road if it connects to Route 66, trucks from Port of L.A. & Long Beach to Barstow. I1717-9
- To addres concerns of the increase impact on ~~our~~ our power grid as a result of all the increased changes for BNSF. I1717-10
- To include the community of Helendale to be represented in any and all meetings pertaining to changes impacting the Helendale community when discussing the Barstow community toward Helendale to Victorville toward the South. I1717-11

RESPONSE TO COMMENT LETTER I1717, PUBLIC COMMENTER 426

I1717-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings accessibility, and **Consolidated Response 06-04** concerning quality of life.

I1717-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I1717-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1717-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1717-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I1717-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1717-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade

separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at the Silver Lakes/Helendale Community at-grade crossings.

I1717-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1717-9 See **Response I1713-11** above.

I1717-10 CEQA requires that an EIR analyze a project's significant environmental effects (i.e., the potential direct, indirect, and cumulative physical changes to the environment). The Draft EIR follows the State CEQA Guidelines Appendix G: Environmental Checklist Form. The Appendix G questions involving electric power are provided below and analyzed in **Draft EIR Sections 5.6: Energy** and **5.17: Utilities and Service Systems** (Draft EIR pages 5.6-27 and 5.17-54, respectively).

- **Impact 5.6-1:** Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.
- **Impact 5.17-1:** Require or result in the relocation or construction of new or expanded water, wastewater/wastewater treatment, stormwater facilities, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

As concluded on Draft EIR page 5.6-37 and shown in **Table 5.6-13: Projected Annual BIG Energy Consumption During Operations** (pages 5.6-36 and 5.6-37), BIG operations would require approximately 145 GWh of electricity annually and impacts would be potentially significant. To reduce potential transload warehouse center electricity and non-renewable energy demand, mitigation measures for the transload warehouse center would require BIG to offset energy demand with on-site renewable solar electricity generation beyond Title 24 compliance (**MM BIG EN-1**) and buildings would be required to meet or exceed 2022CALGreen Tier 2 standards (**MM BIG EN-2**). As BIG would be required to minimize energy consumption (**MM BIG EN-2**) and generate on-site renewable energy (**MM BIG EN-1**), BIG would rely on renewable energy to the most feasible extent, generating approximately 49 GWh from the proposed solar farm, approximately 12 GWh from code-required rooftop solar, and approximately 31 GWh from additional rooftop solar above code requirements (**MM BIG EN-1**), and its impacts would be less than significant after mitigation. Further, SCE would continue to increase electricity generation from renewable sources.

I1717-11 See **Consolidated Response 01** concerning community outreach and the Draft EIR public review period.

COMMENT LETTER I1718

RECEIVED
JAN 11 2026

BIG DEIR – Silver Lakes/Helendale

I1718

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I1718-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I1718-2

SB County should require mitigation by LAFCO for annexation of 2656 acres of unincorporated to Helendale prior to allowing annexation of County lands. I1718-9

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I1718-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I1718-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I1718-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I1718-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I1718-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I1718-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I1718-8

Sincerely,

Signature: Scott Maass (You can remain anonymous if you prefer.)
Print Name:
Mailing Address:
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

RESPONSE TO COMMENT LETTER I1718, SCOTT M

I1718-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings accessibility, and **Consolidated Response 06-04** concerning quality of life.

I1718-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I1718-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1718-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1718-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I1718-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1718-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade

separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at the Silver Lakes/Helendale Community at-grade crossings.

I1718-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

COMMENT LETTER I1719

RECEIVED
JAN 0 6 2026

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I1719-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I1719-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I1719-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I1719-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I1719-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I1719-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I1719-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I1719-7 cont.

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I1719-8

Sincerely,

Signature: _____ (You can remain anonymous if you prefer.)
Print Name: Mr. Jay Parcell
Mailing Address: 26565 Spruce
Helendale, CA 92342 92342 I1719-9

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

Once walked 4 miles by train
Had urgent need.
Must must have bridge
Health & Safety - "real Issues".
NO mention Helendale in EIR!
1 million containers/yr. Outlook Flawed.
Long wait ① Brute dead Limit circulation
Liv. dead E H.A.
need TPA for cost ≤ 3-4?
HECK HECK !
Corgal Horizons Cl^- + NH_3
? Why Helendale left off EIR!?

RESPONSE TO COMMENT LETTER I1719, PUBLIC COMMENTER 427

I1719-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings accessibility, and **Consolidated Response 06-04** concerning quality of life.

I1719-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I1719-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1719-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1719-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I1719-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1719-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade

separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at the Silver Lakes/Helendale Community at-grade crossings.

I1719-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1719-9 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

COMMENT LETTER I1725

RECEIVED
JAN 08 2026

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

I1725

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I1725-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I1725-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I1725-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I1725-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I1725-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I1725-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I1725-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I1725-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I1725-8

Sincerely,

12/20/25

Signature _____ (You can remain anonymous if you prefer.)
Print Name: RANDALL L. ZAHARIA
Mailing Address: 27484 LAKEVIEW DR. #454
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

NOTE/ADDENDUM:
REQUESTING EXTENSION OF COMMENT PERIOD SINCE DEIR DROPPED IN HOLIDAY SEASON. THIS WOULD INCREASE TRANSPARENCY. I1725-9

RESPONSE TO COMMENT LETTER I1725, RANDALL ZAHARIA

I1725-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings accessibility, and **Consolidated Response 06-04** concerning quality of life.

I1725-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I1725-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1725-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1725-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I1725-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1725-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade

separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at the Silver Lakes/Helendale Community at-grade crossings.

I1725-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1725-9 See **Consolidated Response 01-02** concerning the Draft EIR public review period and **Consolidated Response 03** concerning recirculation of the Draft EIR.

COMMENT LETTER I1726

I1726

RECEIVED

JAN 15 2026

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I1726-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I1726-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I1726-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I1726-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I1726-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I1726-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I1726-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I1726-7 cont.

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I1726-8

Sincerely,

Signature: _____ (You can remain anonymous if you prefer.)
Print Name: ALAN R. Pollock
Mailing Address: P.O. Box 491
Helendale, CA 92342 La Quinta CA, 92247-0491

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

I Support Two Access Rds- to Silverlakes Community - I1726-9

RESPONSE TO COMMENT LETTER I1726, ALAN POLLOCK

I1726-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings accessibility, and **Consolidated Response 06-04** concerning quality of life.

I1726-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I1726-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1726-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1726-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I1726-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1726-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade

separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at the Silver Lakes/Helendale Community at-grade crossings.

I1726-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1726-9 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

COMMENT LETTER I1735

RECEIVED
JAN [illegible] 2026

BIG DEIR – Silver Lakes/Helendale

I1735

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I1735-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I1735-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I1735-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I1735-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I1735-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I1735-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I1735-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I1735-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I1735-8

Sincerely,

Signature: John Foulkes (You can remain anonymous if you prefer.)
Print Name: JOHN FOULKES
Mailing Address: P.O. BOX 471
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

I1735-9

BARSTOW IS PUTTING HELENDALE ~~SAF~~ RESIDENTS IN DANGER BY BLOCKING ACCESS FOR MEDICAL ISSUES BY BLOCKING ACCESS TO ROUTE 66.

RESPONSE TO COMMENT LETTER I1735, JOHN FOULKES

I1735-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings accessibility, and **Consolidated Response 06-04** concerning quality of life.

I1735-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I1735-3 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1735-4 See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access delays at the Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1735-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, and **Consolidated Response 10-08** concerning potential impacts to the Silver Lakes/Helendale Community related to hazardous materials.

I1735-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1735-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade

separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at the Silver Lakes/Helendale Community at-grade crossings.

I1735-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1735-9 See **Consolidated Response 06-03** concerning community safety; **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings; **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings; and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

COMMENT LETTER I1881

DRAFT EIR

Michael Brown <racermike41@yahoo.com>

Sun 1/11/2026 9:02 PM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

[NOTICE: THIS IS AN EXTERNAL EMAIL]
Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!

Caution! This message was sent from outside your organization.

I'm writing this letter to express my disappointment with BNSF and the way they have failed to consider the Sylvan community. With our community being the closest to the proposed project, we should have been the first to be consulted with regards to the impacts a project of this magnitude would have on us.. I believe we were misled about the project. We asked multiple times what the layout of the project would be. We were told they didn't know exactly and we should wait until the draft EIR came out. Then the release of the draft EIR is released in November right before the holidays and we are told we will have 45 days to review it. (Not the 90 we were originally told.) Imagine our surprise when the B.I.G. Specific Plan was released and there is a proposed South main line that is close to Rte. 66 and the bulk of the tracks and other operations will be right across from our community. They knew the layout all along and kept that information from us. The specific plan didn't get created overnight. I1881-1

This project will completely erase the whole reason we chose to build our home here. The quiet peaceful area we have loved for the past 27 years will be affected in every way. Light, noise, vibration, more traffic. I1881-2

I understand that there is a potential benefit to Barstow and it will also benefit the areas around the port. That's great. What about us? What is our upside? Seems like our way of life is being sacrificed. We are paying the price and we won't benefit at all. Our reward will be 24/7 noise and vibration to remind us that our peaceful way of life is no more. I have seen all the people that live miles away from this project putting their name on a form letter in support of the project. I would ask them to remember that real people live out here. It's not just empty desert. I would also ask the City Council of Barstow to remember us and hold BNSF accountable to do the right thing and put real mitigation measures in place. Mitigation should be doing as much as possible to reduce the impacts on the "sensitive receptors". Mitigation should not be doing as little as possible until we get to the allowable level. I1881-3

Thank you for the time,

Michael Brown
Yahoo Mail: Search, Organize, Conquer

RESPONSES TO COMMENT LETTER I1881, MICHAEL BROWN

I1881-1 The commentor's concern about lack of transparency and community engagement is noted. See **Consolidated Response 01** concerning community outreach and the Draft EIR public review period.

I1881-2 See **Consolidated Response 04** concerning general non-CEQA issues, **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 06-04** concerning quality of life, **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community, **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor, **Consolidated Response 09-05** concerning consideration of the Sylvan Community in the lighting analysis, **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses, and **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays (e.g., school transportation and the movement of residents and workers) at at-grade crossings.

I1881-3 See **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor, **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses, and **Consolidated Response 08** concerning effects of BIG's increased rail activity concerning delay at at-grade BNSF crossings, **Consolidated Response 05** concerning feasible and enforceable mitigation.

COMMENT LETTER I1882

i want to participate

Raymond Wagner <raymondwagner2025@gmail.com>

Sun 1/11/2026 11:37 PM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

[NOTICE: THIS IS AN EXTERNAL EMAIL]
Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!

Caution! This message was sent from outside your organization.

im stuck at home alot and would like to participate in this plan. im unemployed do you have any positions in the plan for work? let me know thanks I1882-1

RESPONSES TO COMMENT LETTER I1882, RAYMOND WAGNER

I1882-1 The commenter has inquired about job opportunities with BNSF for BIG. The commenter is directed to view https://jobs.bnsf.com/us/en/hiring-process for more information.

COMMENT LETTER I1883

Below are written comments based on the draft Environmental Impact Report (EIR) and the Project.

First thank you for all the hard work that everyone put into the City of Barstow General Plan and Barstow International Gateway (BIG) Project Draft Environmental Impact Report. It is impressive.

I1883-1

Explain the contradiction of the Appendix 5.11 BIG-1 Economic and Fiscal Impact Analysis and Appendix and 8.0-1 BIG Market Forecast on pages 11, 12, 13 and 15 in regard to developing industrial area and housing and how it will be addressed?

Appendix 8.0-1, BIG Market Forecast

I1883-2

Based on CoStar market research into historic growth patterns for the Mojave River Valley and Barstow/ Lenwood area, Kosmont estimates the new development likely to occur within each subarea within the 2028 (i.e., BIG's Opening Year) and 2048 (i.e., BIG's Horizon Year) under the West Transload Warehouse Center Alternative as follows:

Page 11, 2028 Projection

Given there is available land within Victorville and other Mojave River Valley submarket areas which are closer to the Inland Empire (a primary hub for industrial development), Kosmont would expect to see developer interest in acquiring these lands earlier as compared to the land within Subarea 1. Based on the approximate five percent growth in the industrial sector within the Mojave River Valley submarket in the past eight years, Kosmont would *not expect to see actual new construction within Subarea 1 under this scenario until 2030 or later*.

I1883-3

Will the West Transload Warehouse be built in subarea 1? Or as implied in subarea 2 and 3?

Page 12, 2048 Projection

Utilizing the past 20 years of regional industrial development trends for the Mojave River Valley and the City's share of industrial development, Kosmont prepared both a low and high forecast of the regional industrial growth through 2048. This analysis projects a 3.5 percent to 4.5 percent regional growth rate, and a City capture rate at 3 percent to 3.5 percent of the regional growth, due to the indirect impacts of the BNSF transloading development on the 3,700-acres in subarea 2 and subarea 3.
[25] Even though BIG's railyard and transload warehouse center would act as a "closed loop", and there would be no direct demand for industrial development associated with BIG, under this scenario, indirect development could occur by promoting Barstow as an industrial hub, generating interest from other industrial development as utility and roadway infrastructure is built out, city zoning and development regulations are updated under the proposed General Plan, and the workforce grows and is trained in industrial jobs.

The approximately 675 acres available for private development within subarea 1 has the best regional access to both the SR-58 and I-15 highways. With expected construction of the BIG transloading warehouse facilities to the west and the necessary road and utility infrastructure to serve it, there is likely to be future developer interest for warehouse, manufacturing and light industrial facilities in the City.

The above factors result in an estimated forecast of 1.1 million (low) to 1.8 million (high) SF of new 3rd party development within subarea 1. However, due to the City's significant inventory of vacant industrial land, Kosmont estimates the approximately 675-acre subarea 1 would capture approximately 50 percent of the total, or 550,000 to 900,000 SF. Please see Figure 4's assumptions and calculations for Kosmont's conclusions.[26]

I1883-4

West Transload Warehouse Center Alternative

Kosmont was requested to evaluate the development potential for the approximately 675 acres in the West Transload Warehouse Center Alternative with industrial land available for third party development in subarea 1 at the northeast quadrant of the BIG Specific Plan area under the assumption that the BIG transload warehouse facilities are concentrated in the approximately 3,700 acres in subareas 2 & 3.

Figure 4 – West Industrial Alternative Regional Industrial Demand

Wes-t Industrial Alternative
Regional Industrial Demand

	Conservative	Optimistic
Mojave River Valley Inventory	30,000,000	30,000,00
Annual Growth Rate	3.5%	4.5%
2048 Total Projected SF Growth	36,200,000	52,600,000
Barstow's Submarket Capture Ratio	3.0%	3.5%
Barstow Projected SF Growth	1,100,000	1,800,000
East Area Capture Rate of City	50%	50%
East Area 2048 SF Development	550,000	900,000

I1883-4

Page 13, 2028 Projection

Given the lack of infrastructure within the BIG Specific Plan area, and the financing challenges facing new residential development, Kosmont would not expect to see any new industrial or residential development by 2028 under the No BIG / No Annex Alternative.

Page 15, 2048 Projection

With respect to the potential residential development, Kosmont research found in past 25 years approximately 28 new housing units built on land adjacent to Main Street corridor south of Barstow City limits. Given that unincorporated BIG area represents the northern half of that market area, and that this alternative includes no drivers for economic growth or development, Kosmont expects that future development patterns would be approximately the same as past development patterns, thus would estimate 12 to 15 new housing units being built over the next 25 years.

In conclusion approvals are needed for the City of Barstow to move forward. Local Agency Formation Commissions for San Bernadino County (SBLAFCO). Actions (SBLAFCO Action A and Action B) that are reorganizations involving annexations, transfers of responsibility, and detachments. Have they been submitted?

Two separate application requests of the two areas within the City's SOI for LAFCO Actions A and B would be submitted to LAFCO; LAFCO Action A includes a portion of the BIG Specific Plan area currently within the spere of influence (SOI). Does the SBLAFCO approve the total project?

I1883-5

Has support been sought from San Bernardino County Supervisor, Dawn Rowe; California State Senator, Rosilicie Ochoa Bogh; California Assemblyman, Thomas Lackey; and Congressional Representative, Jay Obernolte?

RESPONSES TO COMMENT LETTER I1883, SALLY ARNETT

I1883-1 This comment is introductory to the specific comments provided below. However, this comment also requests clarification with information found in **Draft EIR Appendix 5.11 BIG-1: Economic and Fiscal Impact Analysis** and **Draft EIR Appendix 8.0 BIG-1: Alternative Market Analysis**. **Draft EIR Appendix 5.11 BIG-1** pertains to potential economic and fiscal impacts of future construction and operation of the proposed BIG Project **while Draft EIR Appendix 8.0 BIG-1** pertains to the type and scale of development that would likely occur by 2028 and 2048 under two Alternative scenarios: **West Transload Warehouse Center Alternative** and **No BIG/Existing Countywide Plan and Proposed General Plan Land Use Designation Alternative ("No BIG/No Annex").** Responses have been provided below for additional details on **Draft EIR Appendix 8.0 BIG-1**.

I1883-2 As mentioned above, **Draft EIR Appendix 5.11 BIG-1** would apply to the proposed BIG Project and **Draft EIR Appendix 8.0 BIG-1** would apply to the two aforementioned Alternative scenarios. Kosmont has prepared an alternative market analysis (see **Draft EIR Appendix 8.0 BIG-1**) to evaluate the type and scale of development that would be reasonably likely to occur by 2028 and 2048 under two Alternative scenarios analyzed within **Draft EIR Section 8.0** summarized on **Draft EIR Appendix 8.0** page 2 and here below:

1. **West Transload Warehouse Center Alternative** assumes the proposed General Plan occurs, lands within the BIG SP Area are annexed, but BIG transload warehouse facilities are only developed in Subareas 2 and 3 and no development occurs in Subarea 1.
2. **No BIG/Existing Countywide Plan and Proposed General Plan Land Use Designation Alternative ("No BIG / No Annex")** assumes BIG would not proceed or be approved; lands within the BIG Specific Plan Area that are currently within the County would not be annexed to the City but would instead remain subject to the existing CWP land use; and lands within the BIG SP Area that are currently within the City would be subject to the proposed General Plan land use.

I1883-3 As outlined above, the West Transload Warehouse Alternative would only develop in Subareas 2 and 3 and no development would occur in Subarea 1.

I1883-4 Comment references language from pages 12, 13, and 15 of **Draft EIR Appendix 8.0 BIG-1**. No additional response is necessary.

I1883-5 This comment correctly assumes that Local Agency Formation Commission for San Bernardino County (SBLAFCO) approval is needed. As discussed in **Draft EIR Section 1.0: Executive Summary**, the proposed Project also includes two proposed Local Agency Formation Commission for San Bernardino County (SBLAFCO) Actions that involve annexations, detachments, and reorganizations. Although the City is responsible for assigning a zone district in advance of a SBLAFCO application (i.e., "prezoning"), as well as completing the environmental analysis for the SBLAFCO reorganization and associated LAFCO actions (SBLAFCO Actions A and B), SBLAFCO would independently consider whether to approve the requested actions.

As discussed above, the proposed Project includes two proposed San Bernardino County Local Agency Formation Commission (SBLAFCO) Actions (LAFCO Actions A and B) (annexations, detachments, and reorganizations). Two separate application requests of the two areas within the City's Sphere of Influence (SOI) for LAFCO Actions A and B would be submitted to LAFCO; LAFCO Action A includes a portion of the BIG Specific Plan area currently within the SOI. SBLAFCO Action A, SBLAFCO Action B, and the Local Agency Formation Commission Review Process are described in detail in **Draft EIR Section 3.0: Project Description** (pages 3-38 through 3-41). Applications to SBLAFCO would be filed upon Project approval.

At the time published, SBLAFCO has not yet formally approved the proposed Project.

At the time published, we have received a letter of support, **Comment Letter S5: 34th District CA Assembly**, from California Assemblyman Thomas Lackey.

COMMENT LETTER I1884

 I1884

BNSF BIG PROJECT

Bud Black <budblack2022@yahoo.com>

Mon 1/12/2026 10:36 AM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

[NOTICE: THIS IS AN EXTERNAL EMAIL]
Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!

Caution! This message was sent from outside your organization.

Dear City Officials,

I am writing to formally express my strong opposition to the proposed BNSF intermodal facility in Barstow. I1884-1

While I recognize the importance of efficient freight movement and economic development, the proposed scale and location of this project present serious and unacceptable risks to the Sylvan Avenue community, the local environment, and the long-term quality of life for residents. Common sense alone makes it clear that living in immediate proximity to what would become the largest intermodal facility in the United States poses significant harm to our health and safety. No I1884-2

Environmental Impact Report can change that reality.
Intermodal rail yards operate 24 hours a day, 365 days a year, producing constant noise, vibration, intense lighting, locomotive emissions, and heavy-duty truck traffic. These impacts are not temporary inconveniences; they are permanent, structural features of such facilities. I1884-3

Barstow already experiences extreme heat, high dust levels, and elevated air pollution. The construction and operation of a massive intermodal facility would dramatically increase diesel emissions and particulate matter from locomotives, trucks, and cargo-handling equipment. These pollutants are well-documented carcinogens and are linked to respiratory and cardiovascular I1884-4

disease, asthma, heart disease, premature mortality, impaired childhood development, and cancers including lung and bladder cancer. I1884-4 Cont.

Although BNSF states it will use "clean-energy powered cargo-handling equipment," the reality is that the majority of emissions will still come from locomotives and diesel-powered trucks. Of BNSF's more than 9,500 locomotives nationwide, only approximately 360 Tier 4 locomotives—designed to reduce emissions by about 70 percent—have been acquired since 2015. This means the vast majority of BNSF's fleet remains Tier 3, 2, 1, producing significantly higher pollution levels. Concentrating thousands of trains and trucks in one location will directly shift cancer-causing pollutants into nearby residential neighborhoods. I1884-5

Noise impacts alone are reason for serious concern. Rail operations generate constant sound from idling engines, yard equipment, train horns, wheel-to-rail interaction, switching movements, and coupling operations. These noise levels far exceed what is reasonable for a residential area and pose clear risks to sleep quality, learning, mental health, and overall well-being. I1884-6

Additionally, freight yards require powerful high-mast lighting for nighttime operations. While light shielding is a known mitigation measure, excessive illumination can still cause glare, visual fatigue, headaches, and long-term circadian rhythm disruption, leading to sleep disorders and associated health problems. These conditions would be unavoidable for us nearby residents. I1884-7

Vibrations from train movements, idling locomotives, container handling, switching operations, and increased truck traffic further contribute to stress, anxiety, difficulty concentrating, and sleep deprivation. I1884-8

Traffic and public safety concerns are also substantial. Route 66 is already a dangerous roadway with a history of serious accidents. Residents of the Sylvan Avenue neighborhood regularly experience difficulty making left-hand turns from Route 66 onto Sylvan Ave. On more times that I can count, while waiting on oncoming cars so I can turn into the neighborhood I've experienced cars flying up behind me traveling at excessive speeds, being a two-lane road they I1884-9

have to go off into the shoulder to avoid slamming into the back of me. Kicking up rocks and dirt.
Requests for traffic signals or dedicated turning lanes have been dismissed due to insufficient accident data—an approach that appears to prioritize statistics over human life.

I1884-9 Cont.

Despite BNSF's claims that truck traffic will be minimal, this assertion is not credible. The proposed Barstow facility would be eight times larger than the intermodal facility in Haslet, Texas, where local officials have publicly stated that truck traffic is the number one negative impact. The scale of this project guarantees a significant increase in heavy truck traffic, congestion, and safety risks.

I1884-10

Furthermore, it is well established that residential properties near freight infrastructure often experience declining property values, difficulty in resale, and long-term neighborhood instability. Residents would bear the financial, emotional, and health-related burdens of an industrial operation that should never be located adjacent to a residential community.

I1884-11

BNSF has a documented history of placing large freight facilities in low-income communities, often accompanied by promises of jobs and economic revitalization. However, surrounding areas near major rail yards in Los Angeles and San Bernardino illustrate the long-term reality: deteriorating neighborhoods, increased crime, homelessness, and diminished quality of life. Barstow is already struggling with these challenges, and this project would only intensify them.

I1884-12

For all of these reasons, the proposed BNSF intermodal facility—at this scale and in this location—is neither responsible nor fair to the residents of Sylvan Avenue. I respectfully urge the City to reconsider the location of this project or, at a minimum, require substantially stronger protections and meaningful mitigation measures for affected Sylvan Ave community residence.

I1884-13

Our Sylvan community deserves to be heard. I ask you, as our elected leaders, to prioritize public health, safety, and quality of life above all else.

I1884-14

RESPONSES TO COMMENT LETTER I1884, BUD BLACK

I1884-1 This comment is introductory to the comments that follow. See **Consolidated Response 04** concerning general non-CEQA issues, **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 06-04** concerning quality of life, and **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community, **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor, **Consolidated Response 09-05** concerning consideration of the Sylvan Community in the lighting analysis, **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses, and **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays (e.g., school transportation and the movement of residents and workers) at at-grade crossings.

I1884-2 See **Consolidated Response 04** concerning general non-CEQA issues.

I1884-3 The concern regarding on-going operational impacts, including noise, lighting, air emissions and traffic is acknowledged. See **Consolidated Response 09** concerning consideration of impacts to the Sylvan Community, specifically **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses. Also, **Draft EIR Section 5.12**: **Noise and Vibration** provides an analysis of the potential noise impacts associated with Project-related construction and operations. Where potentially significant impacts are determined, feasible mitigation measures have been proposed to reduce potential impacts.

See **Consolidated Response 09-05** concerning consideration of the Sylvan Community in the lighting analysis. Also, **Draft EIR Section 5.1: Aesthetics** evaluates the potential for BIG to cause significant environmental impact relative to lighting.

See **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis.

Draft EIR Section 5.15: Transportation provides an analysis of the potential transportation related impacts associated with Project construction and operations. No potentially significant transportation-related impacts were identified.

I1884-4 See **Consolidated Response 0903** concerning air quality and cancer risk to receptors within the Sylvan community. The issues raised in this comment are also found in the following **Draft EIR Sections: 5.3: Air Quality**, **5.8 Greenhouse Gases** and **6.0: Cumulative Impacts**.

I1884-5 See **Response I1884-4** above.

I1884-6 See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses, and the effects of BIG's increased rail activity to the Sylvan Community. The issues raised in this comment are also found in the following **Draft EIR Section: 5.12 Noise and Vibration** and **Section 6.0: Cumulative Impacts**.

I1884-7 See **Response I1884-3** above.

I1884-8 See **Response I1884-6** above.

I1884-9 The concern regarding traffic impacts, specifically public safety, is acknowledged. **Draft EIR Section 5.15 Transportation** provides an analysis of the potential transportation related impacts associated with Project construction and operations. No potentially significant transportation-related impacts were identified. Specifically, **Draft EIR Impact 5.15-3** (page 5.15-68) evaluated the potential for BIG to substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). The Draft EIR concluded that impacts would be less than significant. BIG would have the effect of shortening existing truck trips. See **Consolidated Response 15-03** regarding disclosure of local truck trips attributable to BIG. **Draft EIR Figure 5.15 20: City Proposed Draft Truck Routes** (page 5.15-62) depicts the national, State, and local truck routes with which BIG would be required to comply. These routes would provide for the safe and efficient transport of goods while minimizing negative impacts on local circulation, noise-sensitive land uses, and sensitive receptors (proposed General Plan Policy CM-3.1 Truck routes). Finally, impacts to public services including fire protection and emergency (medical) response are addressed in **Draft EIR Section 5.14 Public Services**. The analysis found that BIG would not result in any impacts relative to these issues.

I1884-10 See **Response O21-34. Draft EIR Appendix BIG-1, Section 8.1 Truck Miles Traveled** (page 130-145) discusses truck miles traveled in detail. BIG is not creating new truck trips to select cities but instead reduces the number and length of existing truck trips to those same locations. BIG also is not adding new truck trips to Nationwide Destinations but instead converts existing truck trips to be made mostly by train. This greatly reduces truck miles travelled.

I1884-11 See **Consolidated Response 0602** concerning the role of social and economic issues under CEQA and **Consolidated Response 06-05** concerning decreased property values**.**

I1884-12 See **Consolidated Response 06-03** concerning community safety.

I1884-13 See **Consolidated Response 04** concerning general non-CEQA issues**.**

I1884-14 See **Consolidated Response 04** concerning general non-CEQA issues**.**

COMMENT LETTER I1885

I1885

January 12, 2025

March 2025 Working Draft Land Use Map
LAFCO CONCERNS

To the City of Barstow, Planners, BNSF:

Can we please look at the March 2025 Working Draft Land Use Map?

I am highly concerned about the Low Density Residential Zone and Rural Living Zones.

The low-density residential neighborhood is a recognized formal residential neighborhood, which should be treated as a sensitive receptor with protection from incompatible uses and urban-level protections.

The rural living designation is highly concerning as does this lower our protections? This does not soften the impact to our community - it leaves us more vulnerable. I1885-1

We are one continuous, long-standing neighborhood.

Many of us are modular homes, impacting that vulnerability.

Doesn't this downgrade Rural Living designation disproportionately affect a low-income, rail-adjacent communities even more so, opposite to CEQA's environmental justice requirements?

Can a neighborhood be both low-density and rural living, without justification?

Is this to support the re-zoning purposes of the proposed Business Park adjacent to Sylvan Avenue?

Now may we add in the element of SBLAFCO (San Bernardino Local Agency Formation Commission)? I pray that LAFCO sees this as a signal, this is concerning. I1885-2

I feel this is a way to creep into the City Planning with lack of transperancy. I have tried very hard to understand this project from many perspectives.

As one neighborhood, we need the same quality of protections - for example, the agreement in motion for the High Desert Mutual Water Company and Golden State Water Consolidation Agreement.

Isn't this an inconsistent land-use pattern? I1885-3

Can you please confirm the status of the Disadvantaged Unincorporated Community (DUC) for the entire Sylvan Ave Community? As I understand, it must be applied for or approved at a set length of time. Is 2026 the year for reapplication? And how will we all be protected?

Thank you,

Sherry Baily
Sylvan Avenue Community

RESPONSES TO COMMENT LETTER I1885, SHERRY BAILY 1 OF 6

I1885-1 Please reference **Draft EIR Figure 3-13: Proposed General Plan and Land Use Plan** (page 3-33) or **Barstow General Plan Figure LU-1: Land Use Map** (page 23) for the Proposed General Plan land use map. The Working Draft Land Use Map published in March 2025 provided an opportunity for members of the community and public to comment on the previous working draft. Comments have been received and considered in the Public Review Draft Barstow General Plan published November 2025.

Comments concerning the community are acknowledged; however, the County Land Use Categories would remain very low-density residential land use designations along Sylvan Avenue for areas outside City boundary and annexation areas. As for the areas along Sylvan Avenue within the Proposed General Plan and proposed to be designated Business Park (BP), BP land uses would allow legacy residential permitted. The intent is to enable existing residential uses to continue in perpetuity and to complete the neighborhood fabric, but without expanding the overall footprint of residential areas. One primary residential unit is allowed to continue as a legacy use in the Business Park designation either: 1) as a permitted use on parcels with existing residential units or 2) to be built as a new use on a vacant parcel that is both adjacent to a parcel that contains an existing residential use and is 5 acres or smaller. All criteria are to be based on existing use and parcel configurations as of December 31, 2025.

Input regarding environmental justice and the importance of identifying disadvantaged and underserved communities is acknowledged. The City remains committed to ensuring that all community concerns are considered in the planning process, and these comments will be included in the administrative record for decision-makers' consideration.

I1885-2 Comments concerning SBLAFCO have been acknowledged. As discussed in **Draft EIR Section 3.0: Project Description** (page 3-2), the proposed Project includes two proposed San Bernardino County Local Agency Formation Commission (SBLAFCO) actions (LAFCO Actions A and B) (annexations, detachments, and reorganizations). Two separate application requests of the two areas within the City's SOI for LAFCO Actions A and B would be submitted to LAFCO; LAFCO Action A includes a portion of the BIG Specific Plan area currently within the SOI. SBLAFCO Action A, SBLAFCO Action B, and the Local Agency Formation Commission Review Process are described in detail in **Section 3.0** (pages 3-38 through 3-41).

I1885-3 Comments consisting of concerns about land-use patterns are acknowledged. See **Draft EIR Section 5.11: Land Use and Planning** for land use consistency analysis.

As identified in **Draft EIR Table 5.11-6: Connect SoCal 2024 Goal Consistency Analysis – Proposed General Plan** (**pages 5.11-50** through **5.11-53**), the proposed General Plan is both consistent with the Connect SoCal 2024 goals and would further the State's goals through emphasis on design and reducing VMT. SBLAFCO has identified various goals to encourage the establishment of an appropriate, sustainable, and logical municipal level government structure. These goals also serve to avoid or mitigate environmental effects generally concerning growth-inducing impacts, public services, and agricultural lands.

Draft EIR Table 5.11-7: SBLAFCO Goal Consistency Analysis – Proposed General Plan (**page 5.11-55** and **5.11-56**) analyzes the proposed General Plan for consistency with SBLAFCO's goals. As indicated in this table and as demonstrated in the relevant impact analysis sections of the Draft EIR, SBLAFCO Actions A and B proposed by the proposed General Plan would not result in significant impacts attributed to a conflict with any SBLAFCO plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental impact.

Draft EIR Table 5.11-8: Countywide Plan (CWP) Policy Plan Analysis – BIG (**pages 5.11-59** through **5.11-67**), includes an analysis of the potential for BIG off-site improvements on land that is currently within unincorporated County jurisdiction and that would remain within the County under the Project to conflict with CWP policies adopted for the purpose of avoiding or mitigating an environmental effect. **Draft EIR Table 5.11-8** shows that BIG's off-site improvements on unincorporated lands that would remain within the County under the Project would not conflict with relevant CWP policies.

Draft EIR Table 5.11-9: County Code Consistency Analysis – BIG (**page 5.11-68**) includes an analysis of potential conflicts with County Code standards adopted for the purpose of avoiding or mitigating an environmental effect concerning operations of BIG off-site improvements on unincorporated lands that would remain within the County under the Project.

Draft EIR Table 5.11-10: Proposed General Plan Consistency – BIG (**pages 5.11-69** through **5.11-90**) includes an analysis of BIG's consistency with the proposed General Plan policies adopted for the purpose of avoiding or mitigating an environmental effect, with proposed policies included verbatim.

Draft EIR Table 5.11-11: Barstow Code Consistency – BIG (**pages 5.11-91** and **5.11-92**) includes an analysis of BIG's consistency with Barstow Codes adopted for the purpose of avoiding or mitigating an environmental effect, with Barstow Code text included verbatim below.

Draft EIR Table 5.11-12: Off-site Improvements City Zoning Consistency Analysis – BIG (**page 5.11-93**) analyzes BIG's off-site improvements consistency with the Barstow Code zoning.

Please contact SBLAFCO for status updates concerning Disadvantaged Unincorporated Communities (DUCs). See the following website for additional information: https://sbclafco.org/duc-maps/.

COMMENT LETTER I1886

I1886

JAanuary 12, 2026 Environmental Justice, Connectivity, and Fiscal Burden
Silverlakes

Silverlake's expression of not being included in the draft EIR is concerning - that this process was rushed, incomplete, and potentially costing the taxpayers. Access to their community is essential, and burdens must be alleviated for their Community as well. I1886-1

But who bears the cost?

The Draft EIR fails to address the environmental justice concerns of shifting project-generated connectivity impacts onto San Bernardino County taxpayers rather than requiring BNSF to fully fund mitigation. I1886-2

Both the Silverlakes Community and the Sylvan Avenue neighborhood are rural, low-income communities that already experience disproportionate environmental burdens, including limited access routes, emergency response constraints, and proximity to rail-related pollution. I1886-3

Any circulation or connectivity improvements required because of the BIG project are mitigations, not road upgrades, and CEQA requires that mitigation be funded by the project proponent.

If the County is expected to rely on scarce grant funds or general-fund resources to subsidize these improvements, this would divert essential resources away from other vulnerable communities that urgently need infrastructure, safety, and environmental protections. I1886-4

Doesn't this cost-shifting deepen existing inequities and undermine CEQA's environmental justice mandate? I1886-5

The EIR must clearly identify BNSF as the responsible party for all connectivity and circulation mitigation measures and must ensure that County resources are not depleted to cover private industrial impacts. I1886-6

$40 million dollars San Bernardino County seeking funding and grants to $10 Million dollars BNSF? I1886-7

It was stated that if BNSF were to contribute more, it would increase their liability and insurance.

For me and my community, we can say the same - our liabilities/vulnerabilities are being significantly and unavoidably impacted. If we carry the burden for this project, State, Region, County, City wide - we need to have our health, safety and homes protected. I1886-8

Respectfully,

Sherry Baily
Sylvan Ave Community

RESPONSE TO COMMENT LETTER I1886, SHERRY BAILY 2OF6

I1886-1 See **Consolidated Response 01** concerning community outreach and the Draft EIR public review period.

See **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings.

I1886-2 See **Consolidated Response 04** concerning general non-CEQA issues.

I1886-3 Local circulation network impacts are disclosed in **Draft EIR Impact 5.15-1** page 5.15-57 through 5.15-60. The Draft EIR concluded that the circulation network access for transit, vehicle traffic, bicycles, and pedestrians would be maintained throughout BIG construction and operations. **Draft EIR Section 1.0 Proposed General Plan: Executive Summary Table 1-2: Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation – BIG** (**page 1-13**) summarizes the conclusions of the environmental analysis contained in this EIR, including the mitigation measures identified for all significant impacts. The only applicable mitigation measure to circulation/connectivity is related to **MM BIG AQ-9: Truck Idling Limits and Truck Route Signage** (pages 1-49 and 5.3-106), which has a required component of minimizing on-site vehicular travel within an identified on-site circulation pattern for BIG. In addition to required mitigation, BNSF has committed to implementing various roadway improvements throughout the community. See Figure 2-9 of the BIG Specific Plan[23] for more information. For information regarding the responsible party associated with various mitigation measures, See **Final EIR Section 4.0: Mitigation Monitoring and Reporting Program**.

I1886-4 San Bernardino County has the sole discretion over how general fund monies are spent, of which grants are pursued. See also **Consolidated Response 10-06** concerning feasible and enforceable mitigation for the Silver Lakes/Helendale Community.

The commentor expresses concern that improvements necessitated by BIG would divert grant and general fund resources from the City.

The proposed General Plan is making a number of improvements to roadways and other transportation infrastructure to support development; see **Draft EIR Section 3.0: Project Description**. While State CEQA Guidelines § 15041 does allow the City to establish feasible mitigation measures, the extent of the requirement must be consistent with constitutional requirements that there be both a nexus between the impact and the project, and that the mitigation measures be roughly proportional to the impact. Further, San Bernardino County has been collecting impact fees for roadway improvements in the Helendale/Silver Lakes Community since 1993, a portion of the fees are earmarked for railroad crossings. (https://dpw.sbcounty.gov/transportation/transportation-planning/ See the Helendale/Del Oro Developer Fee Plan).).

[23] City of Barstow. 2025. *Barstow International Gateway Specific Plan*. https://www.barstowca.org/home/showpublisheddocument/10313/638982136436900000. Page 2-17.

Regarding environmental justice for vulnerable communities, CEQA does not have an environmental justice requirement. In regards to policy direction, the topic of environmental justice is discussed for the land and residents of the City of Barstow in the proposed General Plan, included as **Draft EIR Appendix 3.0 GP-1**, and for the unincorporated land and residents of San Bernardino County in the Countywide Plan, both of which identify environmental justice communities and policy direction on public improvements.

I1886-5 Environmental justice is not a required component of analysis for an EIR. For a complete list of required resource areas to be analyzed under CEQA, see State CEQA Guidelines Appendix G. Regarding the comment about cost-shifting, this does not pertain to the environmental analysis within the Draft EIR. As such, no further response is necessary.

I1886-6 Sylvan Avenue and Amaryllis, Ivy, Prairie, Gazana, Osage, and Spinet Streets were not included in the traffic study conducted for the Barstow General Plan or BIG because employees and truck drivers would utilize Main Street, and would not drive through these residential streets. Because these roadways were not included in the traffic study, it is assumed that nominal traffic increases may be expected with future growth, but traffic would not increase substantially. These projects would not result in substantial increases in traffic noise or vibration over existing conditions along Sylvan Avenue, Amaryllis, Ivy, Prairie, Gazana, Osage, and Spinet Streets.

For information regarding responsible parties associated with mitigation measures, See **Final EIR Section 4.0 Mitigation Monitoring and Reporting Program.**

I1886-7 See **Consolidated Response 04** concerning general non-CEQA issues.

I1886-8 See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER I1887

I1887

January 12, 2026 Town Hall Meetings/Presentations/Community

To the City of Barstow, BNSF, and Planners

This whole process was rushed, incomplete, and not community-centered.

Much of this could have been avoided if ample time had been given, along with the opportunity to develop this International Project as a community.

Reading other residents' and agencies' comments/concerns - we are all in this together. I1887-1

As it was brought up in City Hall meetings recently (Nov/Dec 2025), by other residents - people STOPPED attending the Town Hall meetings.

Why? Because we, the public, were being spoken to and not engaged with as a whole. Additionally, many did not even realize meetings were announced.

Why is it that we were never afforded the opportunity to build community and dialogue openly during the presentations? We were separated…into stations. Each station seemed to point to the other station, and we, as the community, got the runaround.

Nothing was simple.

Please note, the Sylvan Avenue Community has been respectful of the process. We waited till most of the public cleared out after such gatherings before attempting to address our concerns. When we did approach the BNSF Team - we as a Community were asked to separate into families and not engage together. We agreed; yet, there were households with multiple family members, and they had the right to be together. At that point, they allowed me to join. I1887-2

Furthermore, as we approached the BNSF Team after the Town Hall meetings,each time we were told, "the lights are going off, and we need to move on." Always rushed and incomplete, unsupported.

After our Sylvan Avenue and Country Club meeting held in 11/2024 (again, why did it take 2 years for our communities, the most impacted to meet with BNSF?), I was told to separate our concerns from the Country Club - as they are City and we are County. For me, I am dishearted that I allowed myself to go along. In fact, it is absolutely overwhelming the amount of effort to segregrate all of us. THIS is a full community concern, not a City vs. County.

It is absolutely mind blowing how many times I had heard residents getting shut down when vocalizing a concern. Too many times. No dialog. No opportunity to engage in public vocalization. Too many times - "put it in writing," or "submit your response to the City's email." I1887-3

During this minimal time of the open comment and review period, CEQA states that a public meeting is "highly encouraged during this period of time." Sadly, it has not.

I was told I don't know what I am talking about, to put on "my big girl pants and figure out who my Representatives are", to not say anything till the EIR was released, and "Sherry - you are a smart girl, you will figure this out." I will not be discouraged. I hope my time invested falls into the space of passion for my community and my health.

I love the people of Barstow. I love Barstow. I love our desert. I love my property. I appreciate my health. I wholeheartedly apologize for the frustrations that have come out over my emails. We have been through a lot.

I1887-3 cont.

Now, City of Barstow, although I am County - how may I support you? If we are gearing to grow, we have some clean up.

I am sorry our world is the way that it is. Lack of respect of people - property - environment - businesses. We have lost the kindness in human kindness.

I want to be a part of a solution, not the problem. The more I learn, the more I pray. It is not just about me, generations to come.

Sincerely,

Sherry Baily
Sylvan Ave Community

RESPONSE TO COMMENT LETTER I1887, SHERRY BAILY 3OF6

I1887-1 See **Consolidated Response 01-01** concerning community outreach; **Consolidated Response 01-02** concerning the Draft EIR public review period; **Consolidated Response 06** concerning potential effects on communities; and **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community.

I1887-2 See **Consolidated Response 01-01** concerning community outreach; **Consolidated Response 06** concerning potential effects on communities; **Consolidated Response 06-03** concerning community safety; and **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community.

I1887-3 See **Consolidated Response 01-02** concerning the Draft EIR public review period; **Consolidated Response 03** concerning recirculation of the Draft EIR; **Consolidated Response 06** concerning potential effects on communities; **Consolidated Response 06-02** concerning the role of social and economic issues under CEQA; and **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community.

COMMENT LETTER I1888

I1888

January 12, 2026 National Concern

To the City of Barstow, Planners and BNSF:

Truly, this isn't just about what is happening in my backyard or in Barstow.

I see this as a National concern.

BNSF promotes this as:
"the future of freight"
"transformative"
"a model of how goods will move across the country in the future"
"the largest intermodal facility in the world"
"Barstow will be the template for goods movement for our Country"
"Enhancing and elevating the State's Supply Chain Ecosystem"

I1888-1

This will be the first of it's kind nationwide.

My concerns, if we don't do this right - it will be a template for future freight.

If the Environmental Review is weak here, it will be weak everywhere. If Community Protections are ignored here, they will be ignored Nationwide.

Transformative projects need transparency.

A world-scale facility cannot rely on rushed, incomplete, or inadequate analysis...just to hurry and break ground.

Wouldn't the City of Barstow, the County of San Bernardino and BNSF want to provide next-level blueprints for what they are proposing to bring?

My community adjacent to this 4,700 acre project is concerned about many areas, to include but not limited to:

Missing a health risk assessment
Missing cumulative impacts
Missing Environmental Justice analysis
Has burden-shifting mitigations
Private residential water well and hydrology concerns
Air quality concerns
Noise and Vibration exceeding and disregard for standards set for General Health for Residence Living Near Transportion Movement, written by the FRA-Federal Railroad Administration.
As well as so much more.

I1888-2

We are not being adversarial; we want measurable and enforceable transparency.

This rushed EIR review period was set for the minimum window of 45 days, over the holidays, which opened it up to 57 days. We submitted in writing for an extended period. We received 7 days.

I1888-3

The BNSF Team prides itself on this document being "so big, it will crash your computer" and being "80,000 pages"...

The Draft Environmental Impact Report is to allow citizens to understand the impacts, not intimidate us. I1888-4

It is to identify harm and mitigations.

None of which they have acknowledged-my community was completely omitted, and 2 others were hardly mentioned.

Our message is this:
1) The Barstow International Gateway Project dEIR was rushed, and even wanting to break ground faster since its release on 11/10/2025. I1888-5

2) The dEIR is incomplete. We are asking for a re-work and recirculation to include our communities and our health risks. We want proper communication and ongoing monitoring. This report projects now (Beginning Year) till 2048 (Horizon Years). I1888-6

3) To inform Barstow of the financial risk being placed on the Residents/Taxpayers. I1888-7

4) Share our global concern as noted above. I1888-8

If this is such a benefit to the State of CA, the Southern CA Region, the County of San Bernardino, the City of Barstow-then those of us carrying the burden need protection - our health, rural property homes, safety, water systems, and way of life are going to be "significantly and unavoidablely" impacted.

With gratitude for your time and consideration, thank you. I have fully learned a lot in this process, in good-faith to engaging in a meaningful way as requested in writing. I apologize for it's length and tone at times. Trying to maintain life, business, and well-being during this period of time has been quite stressful. I1888-9

Just as I was relieved when the dEIR was released, I am also now relieved that this will be my last submission to the process.

May we all remember the value and importance that we each bring into our days and to the people with whom we interact.

Respectfully,

Sherry Baily
Sylvan Ave Community

RESPONSE TO COMMENT LETTER I1888, SHERRY BAILY 4OF6

I1888-1 This comment is noted. However, the language is broad and does not raise any specific environmental concerns about the adequacy of the Draft EIR. See **Consolidated Response 04** concerning general non-CEQA issues.

I1888-2

- **Health Risk Assessment:** See **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis.
- **Cumulative Impacts:** See **Draft EIR Section 6.0: Cumulative Impacts** and **Consolidated Response 09-06** concerning consideration of cumulative impacts to the Sylvan Community.
- **Environmental Justice Analysis:** As stated in previous responses, environmental justice is not a required component of analysis for an EIR as listed in State CEQA Guidelines Appendix G.
- **Burden-Shifting Mitigations:** As noted in the Mitigation Monitoring and Reporting Program, BNSF is responsible for implementing the various mitigation measures identified, and the City, Council, or other responsible agencies are responsible for monitoring and enforcing the mitigation measures. There are no mitigation measures for which local residents are responsible.
- **Private residential water well and hydrology concerns:** See **Consolidated Response 09-04** concerning consideration of the Sylvan Community in the Hydrology and Water Quality analyses, **Consolidated Response 09-07** concerning consideration of impacts to Sylvan Community private water wells**,** and **Consolidated Response 09-10** concerning consideration of the Sylvan Community in the Hazardous Materials analysis, including arsenic levels/mobilization.
- **Air Quality Concerns:** See **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis.
- **Noise and Vibration:** See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analysis.

I1888-3 See **Consolidated Response 01-02** concerning the Draft EIR public review period.

I1888-4 See **Consolidated Response 06** concerning potential effects on communities and **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community. See **Draft EIR Section 6.0: Cumulative Impacts** to see discussions on potentially significant and unavoidable impacts, and **Final EIR Section 4.0: Mitigation Monitoring and Reporting Program** concerning the mitigation measures being implemented for BIG.

I1888-5 This comment is noted. However, the language is broad and does not raise any specific environmental concerns about the adequacy of the Draft EIR. See **Consolidated Response 04** concerning general non-CEQA issues.

I1888-6 See **Consolidated Response 03** concerning recirculation of the Draft EIR.

I1888-7 See **Consolidated Response 04** concerning general non-CEQA issues.

I1888-8 See **Response I1888-1.**

I1888-9 See **Consolidated Response 02** concerning significant and unavoidable impacts and the Statement of Overriding Considerations; **Consolidated Response 05** concerning feasible and enforceable mitigation; **Consolidated Response 06** concerning potential effects on communities; and **Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community.

COMMENT LETTER I1890

11890

January 12, 2026
Theft - Safety

To the City of Barstow, BNSF and Planners

I really thought that my last email was my last public comment,but I think this is important as well.

I1890-1

Noting that a camper this weekend, near Newberry Springs had gunfire unloaded on them, needing the Sheriff's to escort them back to the site to gather their belongings:

The cause - stated as organized crime robbing the trains.

I1890-2

We have witnessed this firsthand in adjacent our community. This is a reason we do not want Sylvan Avenue to connect to the I-15 Freeway.

Initially, when all the homes from Lenwood Road to Hinkley were purchased and then demolished,it left a huge vacancy of oversight. What has been happening along the rail - theft.

We have witnessed multiple strings of cars and trucks, traveling down the vacant roads parallel, and you know they are up to no good.

We originally took it up with the BNSF Team, we were told it wasn't a BNSF but a Sheriff problem.

Then we finally started to see BNSF take protective measures - thank you. Rail Police and Pinkerton.

I1890-3

I understand this closed loop system is supposed to help deter this. I truly do hope so.

This is in alignment with my concern for more County Sheriff presence.

Again, this County is too large, and the Sheriff's coverage is vast. The Barstow PD isn't the only one to receive a Community Benefit...

Please also consider supporting our Sheriff Department.

With the trains comes the riffraff.

How do we take back safety and humanity?

Thank you.

Sherry Baily
Sylvan Ave Community

RESPONSE TO COMMENT LETTER I1890, SHERRY BAILY 6OF6

I1890-1 The concerns about organized crime are acknowledged. See **Consolidated Response 06-03** concerning community safety, including crime, related to BIG.

I1890-2 No proposed improvement would directly connect the Sylvan Community to Interstate-15. The concerns about potential increases in organized crime are acknowledged. As stated above, See **Consolidated Response 06-03** concerning community safety, including crime, related to BIG.

I1890-3 Concerns about theft along the existing rail are acknowledged. However, State CEQA Guidelines § 15126.2 states that an EIR shall focus on the effects of the proposed project on the environment, not existing conditions within the study area. As such, BIG is not required to respond to existing crime within or adjacent to the Sylvan Community. Further, See **Draft EIR Section 5.14: Public Services** (page 5.14-54) for potential BIG impacts to the existing police and emergency services.

COMMENT LETTER I1892

I1892

Public Comment on Barstow International Gateway Project

Marcus Nelson <marcuscolin@icloud.com>

Mon 1/12/2026 1:59 PM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

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I would like to express deep concern regarding the insufficient review of mitigation measures proposed for the BIG project, particularly regarding addressing impacts related to operations. Page 5.3-110 of the Draft EIR states the inaccurate claim that "Catenary lines are impractical since this would involve laying thousands of miles of electrifies[sic] lines the distance of the rail...". Such a claim would suggest that such rail electrification is impractical where the BIG project is located specifically or Southern California in general. I1892-1

However, the Brightline West project is actively engaged in developing electrified rail lines in Southern California, including just a few short miles from the BIG project. This would include a new substation in Barstow connecting to Southern California Edison and laying electrified rail lines across BNSF rail lines adjacent to this project. Brightline West is already actively developing the local knowledge, workforce, and supply chain to support the use of electrified rail. As such, the claim in the Draft EIR that catenary lines are impractical appears to be inaccurate and wrongly preclusionary, suggesting insufficient analysis of mitigation measures. The ability to further reduce the "Significant and Unavoidable Impact" of BIG warrants genuine consideration given the availability and feasibility of technologies to reduce emissions to the people of Barstow and throughout Southern California. The potential use of Catenary Electric Locomotives for linehaul from ports to the IMF should be fully considered for the BIG project. I1892-2

RESPONSES TO COMMENT LETTER I1892, MARCUS NELSON

I1892-1 The City acknowledges that Brightline West is advancing an all-electric, passenger high-speed rail corridor in the I-15 median that would use overhead catenary and new utility delivery points; this is a meaningful regional electrified passenger effort. However, Brightline West's passenger overhead catenary system does not demonstrate feasibility for catenary electrification of freight mainlines and an intermodal freight yard such as BIG. Passenger overhead catenary systems are constructed in a dedicated corridor without freight container clearances, gantry crane movements, hostlers, or block swaps. See **Responses O21-124** through **O21-146, and Consolidated Response 05** for further discussion on the infeasibility of catenary systems for freight, which summarize key findings of the *BEL and Catenary Feasibility Analysis*. Additionally, see Response O22-13 for specific reasons why connection to the Brightline West infrastructure is infeasible.

I1892-2 See **Response I1892-1.**

COMMENT LETTER I1893

I1893

SENT VIA EMAIL

January 12, 2026

Chris Heldreth
Community Development Director
City of Barstow
Email: generalplan@barstowca.org

Re: Public comment on the Barstow International Gateway General Plan – SCH #2024020501

Dear City of Barstow Planning Staff,

Thank you for the opportunity to provide comments on the draft Environmental Impact Report (EIR) on the Barstow International Gateway (B1G - the Project) – SCH# 2024020501.

The Project aims to layout the General Plan for the City of Barstow through 2048 and describes an annexation project to create an inland intermodal rail terminal for BNSF. These comments solely cover the annexation and intermodal rail terminal which impact the entire region of Southern California and the transportation, air quality, greenhouse gas, and cumulative impacts associated with logistics in the region. I1893-1

There are significant deficiencies in the analysis of the impacts of the intermodal rail terminal and its compliance with regional policy documents.

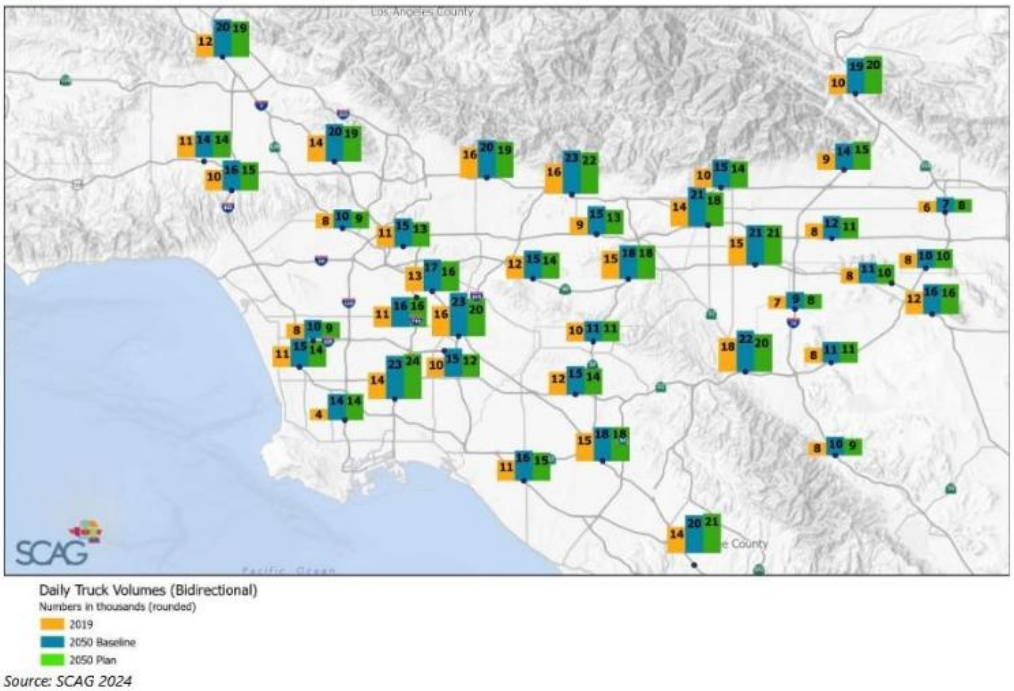
- The project fails to include recently passed Assembly Bill 98 (2024) and Senate Bill 415/Assembly Bill 735 (2025) requirements for warehouse projects, truck routes in its transportation analysis (Section 5.15). The project will create warehouses and truck traffic and needs to describe the circulation element for avoiding sensitive receptors for a major logistics facility. I1893-2
- The project excludes truck trips in analysis of VMT of the B1G specific plan (Section 5.15; Table 5.15-13). This is an intermodal facility and one of the key objectives of the project listed is to reduce truck trips throughout the region by mode-shifting freight volume to rail. However, the VMT analysis does not include truck trips. Excluding the freight VMT associated with an intermodal terminal is likely to be the largest fraction of VMT generated by the facility. Failing to quantify this limits the ability of the public and decision makers to understand the cumulative GHG impacts of the project. Trucks are 'Vehicles' and any significance threshold that ignores them in determining project transportation impacts and significant environmental impacts is flawed and unreliable. I1893-3
- B1G asserts that it will '*reduce regional and national heavy-duty TMT by 1) increasing the use of trains for cargo transportation; and 2) providing an intermodal facility (IMF) closer to container origins/destinations than currently exists.*' Section 5.15, p. 5.15-75. The B1G is intended to expand freight capacity of the region – adding additional locomotive trips to the region. There is no mechanism by which regional truck trips will be reduced or monitored in this specific plan or project. SCAG's Connect SoCal 2024 goods movement plan Map 3 specifically shows that truck trips will substantially increase in the region by 2050. I1893-4

- B1G assumes that existing containers that pass-through Southern California will 'shift' to B1G. However, import container volumes double by 2040[1] in port planning documents. The existing container traffic will continue to be handled by existing facilities, while new facilities will handle additional containers as part of the broad plan for freight capacity expansion. This is clearly not mode-shift, but a capacity building project. As a result, the projections for reductions are unsubstantiated and false. If there is some plan to remove trucks from the region as part of the project, please describe how many trucks will be scrapped or transferred out of the region. I1893-5
- Table 5.15-20, 21, and 22 all cite BNSF (2025) as the source of the Truck Miles Traveled analysis but there is no citation to that document in Section 5.15 substantiating the claim. Moreover, it is not clear how a private railroad entity associated with the project is a reliable source of information on truck miles travelled. Independent environmental contractors should generate these datasets and this appears to be a clear conflict-of-interest. I1893-6
- Table 5.15-20, 21, and 22 all demonstrate that the B1G final buildout will not reduce truck trips or truck miles travelled. Total truck trip miles in the region increase by about 50% from 2028 through 2048. This is simply capacity building and while the proponents are asserting that this is taking truck trips off the road, which is a complete mischaracterization. This project is adding locomotives and other megaprojects are adding truck trips. I1893-7
- In total, the projects will increase both truck trips and train trips to increase freight capacity. The mode-share is important but not characterized by this project. Any environmental claims asserting that truck trips will be avoided or reduced by construction of this project need to demonstrate how trucks will be removed from the region and accounted for as part of the MMRP. I1893-8

[1] https://urbanland.uli.org/economy-markets-trends/doubling-the-freight-carried-by-the-ports-of-los-angeles-and-long-beach-by-2040

Connect SoCal 2024 | Goods Movement Technical Report

Map 3. Truck Volumes on Key Corridors (2019, 2050 Baseline and 2050 Plan)



Source: SCAG 2024

Figure 1 - Map 3 from adopted Connect SoCal 2024 Goods Movement Technical Report (2024) showing daily truck volumes on major corridors. There is no indication of truck reductions.

I1893-9

- Modeled GHG emissions used out-of-date EMFAC 2021 emissions estimates that included rules for trucks that are no longer in effect. Please revise all GHG modeling to include alternative scenarios that include and exclude Advanced Clean Fleet emissions rules for electrification of truck fleets.

I1893-10

- B1G Appendix 5.1 GHG assessment indicates that adding B1G will increase trains in 2028 from 48.7 trains per day to 96.1 trains per day with about 3.4-3.5 locomotives per train. Doubling the number of daily trains is roughly doubling emissions.

I1893-11

- Truck trips will not be 'removed' by expanding capacity of rail as claimed in Appendix 5.8 Table 17. B1G is expanding freight capacity for rail and other projects are increasing truck trips at the same time. The basics of cumulative impacts analysis requirements does not allow this project to claim reductions in truck trips when truck trips are INCREASING according to all the other documents for other regional megaprojects. The B1G is required to include cumulative impacts analysis projections of regional warehouse growth. There is over 500 million square feet of warehouse buildout in the regional pipeline approved or under CEQA review (Warehouse CITY v1.23, 2025). Those projects will drastically increase truck trips and will not go offline just because this project is built/approved.

I1893-12

In conclusion, this project asserts that it will remove trucks but has no mechanism to actually remove trucks or truck miles travelled. It simply expands regional freight capacity while assuming that the growth in freight and trucks would have infinite capacity to grow if B1G wasn't built. None of that is substantiated in the regional planning documents for freight from the ports or SCAG. As a result, this project is falsely asserting it will reduce truck miles travelled. It has no mechanism or mitigation that includes regional truck trips reduction and needs to simply indicate it is a freight capacity expansions that will double air quality pollution, GHG pollution, and clog shared passenger rail facilities in the Inland Empire. In fact, this project is a perfect example of capacity expansion increasing total freight pollution within the region. I1893-13

Note this facility could claim that it was reducing truck VMT if it was part of a state or regional policy that reduced truck VMT. Unfortunately, SCAG and the state have policies only to increase truck VMT over the next 20 years and refuse to address the harmful impacts of this on our communities. As such, I represent communities that these trains will pass through that will add to our disproportionate burden of pollution. This facility needs to implement actually internal truck reductions or advocate for defunding of highway expansions that will increase truck VMT in the region as part of its implementation. I1893-14

I look forward to seeing a more comprehensive analysis of these issues moving forward. I1893-15

Mike McCarthy, PhD

RESPONSES TO COMMENT LETTER I1893, MICHAEL MCCARTHY

I1893-1 See **Consolidated Response 04** concerning general non-CEQA issues.

I1893-2 See **Draft EIR Section 5.15: Transportation** regarding potential impacts associated with truck traffic generated by intermodal and logistics-related activities. The analysis assesses vehicle trip generation, roadway operations, truck access, and circulation patterns, and evaluates consistency with applicable federal, State, and regional transportation plans and policies that were in effect at the time the Draft EIR was prepared. Assembly Bill 98 (2024) only applies to logistic use development, which does not include retail facilities, facilities that are served primarily by rail, or a Strategic Intermodal Facility as defined by AB 98, nor does AB 98 apply to projects with a local entitlement application submitted prior to September 30, 2024. As discussed in **Draft EIR Section 3: Project Description**, BIG proposes a strategic intermodal facility, as the term is used in AB 98, and thus, the standards under AB 98 are not applicable. Additionally, AB 98 does not apply to existing facilities or proposed project applications submitted prior to September 30, 2024. The application was submitted to the City December 22, 2023, and the Notice of Preparation (NOP) for the Project was published on February 14, 2024; therefore, the application had been deemed complete prior to September 30, 2024, and AB 98 does not apply to the Project. Senate Bill (SB) 415 modified AB 98 but did not alter AB 98's operative date and AB 735 was a parallel effort as SB 415 but did not become law. Therefore, the Draft EIR adequately evaluates the transportation regulatory setting and BIG's transportation impacts associated with truck traffic and circulation, and no revisions to **Draft EIR Section 5.15** are needed.

I1893-3 As discussed in **Draft EIR Section 5.15: Transportation** (page 5.15-21 to 5.15-27), the BIG VMT analysis was conducted using the San Bernardino Traffic Analysis Model Plus (SBTAM+), consistent with State CEQA Guidelines § 15064.3. For the Cumulative VMT Threshold, BIG was evaluated using Total VMT per Service Population, calculated with the Boundary Method, which captures all vehicle travel within the City and Sphere of Influence, including truck travel, to assess citywide effects under Horizon Year 2048 conditions. For the Project VMT Threshold, BIG was evaluated using the Home-Based Work VMT per Worker metric, calculated with the Production–Attraction (PA) method, which measures VMT associated with employees traveling between home and work and excludes heavy-duty trucks, consistent with OPR guidance. State regulatory guidance from the OPR and State CEQA Guidelines § 15064.3 clarify that VMT analysis should focus on passenger vehicle travel attributable to employee and household trips, and that heavy-duty truck trips are not required to be included when evaluating VMT impacts.

The **Draft EIR Appendix 5.15 BIG-1, Section 8.1 Truck Miles Traveled** includes a detailed quantification and analysis of changes to Truck Miles Traveled (TMT) with BIG (pages 130-145). Heavy-duty trucks are not required to be included in the VMT impact analysis under CEQA (as noted above, see State CEQA Guidelines § 15064.3, subdivision (a)); therefore, analysis of the heavy-duty truck miles traveled (TMT) attributable to BIG operations was provided independent of VMT and did not inform the transportation impact analysis under

CEQA. The TMT analysis was used to inform CEQA analysis of BIG's impacts in other relevant impact areas (e.g., Air Quality, GHG Emissions, Energy, and Noise).

Accordingly, no changes to the Draft EIR are required.

I1893-4 While regional freight activity is projected to increase under SCAG's long-range plans, **Draft EIR Section 5.15: Transportation** evaluates how goods are routed and the distance trucks travel under No Project versus Plus Project conditions. The reduction in truck miles is not dependent on enforcement or monitoring measures but instead results from the physical availability and use of an intermodal rail facility that alters freight routing and trip lengths. Further, as identified in **Draft Section 5.15: Transportation** (page 5.15-22), the BIG VMT analysis uses SBTAM+ which is reflective of Connect SoCal 2024 and is consistent with SCAG's regional modeling framework and socioeconomic assumptions. Accordingly, no changes to the Draft EIR are required. Additionally, see **Responses L17-15** through **L17-18** regarding the *Market Benefits Report* that was prepared to assess BIG's benefits to customers and documenting that BIG is a primarily rail-fed facility. BNSF, as a common carrier, cannot control regional truck trips, but as noted in **Draft EIR Section 3.0: Project Description**, "BNSF would include contractual obligations as a condition of warehouse occupants' use of the land to develop and operate the warehouses that would include volume commitments for long-haul container movements from BIG on BNSF's rail network, utilizing the unique cross-dock intermodal/ closed loop operation with the intermodal facility" (page 3-55).

I1893-5 As discussed in **Draft EIR Section 5.15: Transportation** (page 5.15-75), BIG would reduce the number of heavy-duty truck trips required to serve the transload containers through providing a train connection directly from the Ports to BIG's transload warehouse center, which would additionally reduce heavy-duty trucks from the transload warehouse to nationwide hub cities near the transload containers' final destinations. The Draft EIR recognizes that freight volumes are expected to grow and evaluates truck miles traveled (TMT) under future-year conditions by comparing No-BIG Baseline and Plus-BIG scenarios for Opening, Interim, and Horizon years; see **Draft EIR Section 5.15: Transportation** pages 5.15-75 to 5.15-77. The reductions identified are distance-based, reflecting shorter truck haul lengths and a shift of long-haul movements to rail, rather than a reduction in the number of containers, truck trips, or freight capacity. As discussed in **Draft EIR Section 5.15: Transportation** pages 5.15-74 to 5.15-78), the analysis demonstrates that, within a growing freight market, BIG would change freight routing patterns in a manner that reduces total truck miles traveled relative to a No-Project condition. Additionally, see **Response O21-4** and the *BNSF Hobart and San Bernardino Railyard Capacity Memorandum*, which substantiates that existing BNSF facilities are able to process forecasted growth through 2048 without expansion even in the absence of BIG, and therefore BIG is not proposed or needed to remove an existing impediment to BNSF's capacity to process forecasted growth. No changes to the Draft EIR are required.

I1893-6 Sources used for **Draft EIR Table 5.15-20: BIG Truck Miles Traveled Summary**, **Table 5.15-21: Transload Warehouse Center Truck Miles Traveled Summary**, and **Table 5.15-22: IMF Truck Miles Traveled Summary** are appropriately cited as BNSF (2025). Information included in the

tables mentioned was provided to Kimley-Horn directly from BNSF. As the owner and operator of the proposed rail and intermodal facilities, BNSF has specialized expertise and firsthand knowledge of freight operations, cargo throughput, and associated truck activity. BNSF routinely prepares and relies upon this type of operational data and is therefore qualified to provide Project-specific truck travel information.

The fact that BNSF is associated with BIG does not preclude it from being a reliable source of information. In fact, CEQA contemplates that the lead agency work closely with the project applicant to obtain information about the project and analyze its environmental impacts under CEQA.[24] Further, CEQA contemplates that a consultant retained by the project applicant can prepare any or all of the materials that inform the decision-making process. (Pub. Resources Code, § 21082.1)[25,26]

Under CEQA, "substantial evidence" includes factual information, reasonable assumptions predicated upon factual information, and expert opinion supported by facts. Information supplied by a Project applicant or operator with specialized knowledge of its own operations constitutes substantial evidence when it's based on relevant facts and professional expertise. As such, the truck miles traveled data provided by BNSF meet this standard and were appropriately relied upon in the Draft EIR.

I1893-7 As shown in **Draft EIR Table 5.15-20: BIG Truck Miles Traveled Summary, Table 5.15-21: Transload Warehouse Center Truck Miles Traveled Summary**, and **Table 5.15-22: IMF Truck Miles Traveled Summary**, analysis of the TMT attributable to BIG operations is provided here independent of VMT and does not inform the transportation impact analysis under CEQA. As noted in Table 5.15-20, BIG would decrease heavy-duty TMT nationwide by hundreds of millions of miles per year, with an estimated annual reduction of 333 million heavy-duty TMT in 2048. Additionally, see **Response O21-4** and the *BNSF Hobart and San Bernardino Railyard Capacity Memorandum*, which substantiates that existing BNSF facilities are able to process forecasted growth through 2048 without expansion even in the absence of BIG, and therefore BIG is not proposed or needed to remove an existing impediment to BNSF's capacity to process forecasted growth.

I1893-8 **Draft EIR Section 5.15: Transportation** evaluates truck miles traveled (TMT) under future conditions by comparing No-BIG Baseline and Plus-BIG scenarios for Opening (2028), Interim (2033), and Horizon Year (2048) conditions (page 5.15-75 to 5.15-77). The reductions reflect shorter truck haul lengths and a shift of long-haul movements to rail.

Draft EIR Section 5.15: Transportation (page 5.15-74) states that heavy-duty truck miles are presented as an additional, non-CEQA disclosure to inform air quality, GHG, energy, and noise analyses, and are not tied to CEQA transportation significance, mitigation measures, or monitoring requirements. BIG does not mandate or require truck scrappage, transfer, or

[24] *Foundation for San Francisco's Architectural Heritage v. City and County of San Francisco* (1980) 106 Cal.App.3d 893, 908.
[25] *Gentry v. City of Murrieta* (1995) 36 Cal.App.4th 1359, 1397.
[26] *San Franciscans Upholding the Downtown Plan v. City & County of San Francisco* (2002) 102 Cal.App.4th 656, 764-765.

removal , and no such actions are included in the Mitigation Monitoring and Reporting Program.

I1893-9 SCAG's Goods Movement Technical Report was prepared April 2024, shortly after issuance of the Notice of Preparation for this EIR, and therefore did not consider the quantitative reductions achieved by BIG. Comment does not raise a substantive issue on the content of the DEIR. Therefore, no further response is needed.

I1893-10 As discussed in **Response L17-57**, the GHG analysis appropriately used CARB's EMFAC 2021 emissions model, which was the latest CARB-approved model available at the time the Draft EIR was circulated and, as disclosed in the Draft EIR, has not been superseded by updated CARB guidance applicable to CEQA analysis (**Draft EIR Section 5.8.3,** pages 5.8-38 to 39**; Draft EIR Appendix 5.8 BIG-1**). **Draft EIR Section 5.8** explicitly discloses that EMFAC 2021 assumed implementation of the Advanced Clean Trucks (ACT) and Advanced Clean Fleets (ACF) regulations and further explains that these regulations were subsequently nullified through federal action after modeling was completed (pages 5.8-45 through 5.8-47). The Draft EIR therefore acknowledges that future truck emission rates may be higher than those reflected in EMFAC 2021 and concludes that the analysis is conservative, because higher emission rates would increase the magnitude of the truck miles traveled (TMT)-related emissions reductions attributed to BIG (**Draft EIR** pages 5.8-38 to 5.8-39).

I1893-11 See **Draft EIR Section 5.15: Transportation**, regarding potential impacts associated with train activity. The Commenter may have mistaken *total* trains (including background growth that would occur regardless of BIG), with new trains attributable to BIG. As noted on Draft EIR page 5.3-59, a future baseline was used for BIG's environmental analysis that accounts for growth in train counts that would occur over the analysis period (through 2048) regardless of BIG. However, as noted on **Draft EIR Section 3.0: Project Description** page 3-53, BIG would "add a new volume to the BNSF network, totaling approximately 3.2 trains per day on average in 2028, approximately 4.3 trains per day on average in 2033, and approximately 4.9 trains per day on average in 2048". Thus, while the total trains doubles from Opening Year 2028 to Horizon Year 2048, only 4.9 trains per day are attributable to BIG.

I1893-12 As discussed in **Draft EIR Appendix 5.8 BIG-1** page 10, the vast majority of containers moved through the BIG intermodal facility would arrive and depart by train, not by heavy-duty truck, and BIG would use zero-emission electric hostlers for container movements between the intermodal facility and the transload warehouses, not diesel trucks. Because BIG would consolidate and process container volumes at the rail yard rather than through traditional truck to rail intermodal operations, long-distance truck trips between the Ports and inland warehouse destinations would be avoided**. Draft EIR Appendix 5.8 BIG1, Table 18** (page 82) quantifies the resulting annual net TMT removed from the national roadway network, which is incorporated into the GHG analysis as an emissions reduction, based on detailed projections of the containers that BIG would serve. This detailed analysis of container origins and destinations substantiates that BIG would reduce truck trips. The Commenter's citations to regional increases in warehouse development are not applicable to BIG given BIG has prepared detailed origin/destination estimates for containers served at BIG. BIG's cumulative

impacts are addressed in the Draft EIR and fully account for regional growth, including warehouse expansion. As discussed in **Draft EIR Section 5.8: Greenhouse Gas Emissions**, BIG's design results in a net reduction in long-haul truck travel compared to existing conditions.

BIG's cumulative impact analysis is informed by contacting surrounding jurisdictions to determine current and planned projects and includes study areas specific to each resource area to assess potential cumulative impacts. BIG's cumulative analysis accurately assesses potential cumulative impacts of BIG together with current and planned projects.

Additionally, see **Response O21-4** and the *BNSF Hobart and San Bernardino Railyard Capacity Memorandum*, which substantiates that existing BNSF facilities are able to process forecasted growth through 2048 without expansion even in the absence of BIG, and therefore BIG is not proposed or needed to remove an existing impediment to BNSF's capacity to process forecasted growth. Here..

I1893-13 As discussed in **Draft EIR Appendix 5.8 BIG-1**, and in **Draft EIR Section 3.0, Project Description**, most containers at BIG would be moved internally by electric hostlers, not heavy-duty trucks, and long-haul container movement would shift from trucks to dedicated Tier 4 rail service, resulting in measurable reductions in national truck miles traveled (**Draft EIR Appendix 5.8 BIG-1,** page 82). The Draft EIR does not falsely assert truck reductions but accurately reflects project-specific operational changes that lessen long-distance truck travel and associated emissions. See **Response O21-4** and the *BNSF Hobart and San Bernardino Railyard Capacity Memorandum*, which substantiates that existing BNSF facilities are able to process forecasted growth through 2048 without expansion even in the absence of BIG, and therefore BIG is not proposed or needed to remove an existing impediment to BNSF's capacity to process forecasted growth.

I1893-14 See **Response I1893-13**. The Draft EIR does not rely on Statewide or SCAG policies to claim truck VMT reductions. The Draft EIR identifies BIG-specific reductions based on BIG's operational impacts.

I1893-15 Comment serves as a conclusion to the preceding comments. No further response is required. See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER I1894

Response to Draft EIR – BNSF Barstow International Gateway (BIG) Project with Specific Reference to Hinkley, Sylvan Avenue, West Lenwood, and Groundwater Impacts

John Turner <turner.john1@gmail.com>

Mon 1/12/2026 3:19 PM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

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Caution! This message was sent from outside your organization.

Dear BNSF Railway Company and City of Barstow Representatives,

I appreciate the opportunity to provide comments on the Draft Environmental Impact Report (EIR) for the Barstow International Gateway (BIG) Project. I recognize the complexity of this proposal and the wide range of perspectives it has generated—from those who support long-overdue economic growth to those who are deeply concerned about the long-term impacts to surrounding rural communities.

I want to state clearly that I am not opposed to this project. Growth and investment in the High Desert are long overdue, and the BIG Project has the potential to deliver important benefits, including permanent and construction related jobs, roadway and transportation improvements, increased economic activity, expanded logistics and freight capacity, workforce development opportunities, and increased tax revenues that may support public services and infrastructure across the region. I1894-1

At the same time, these benefits must be weighed against the very real and permanent impacts to nearby communities, particularly Hinkley and the west Lenwood area, which will experience some of the most direct and concentrated effects of the project.

The Draft EIR identifies several impacts of concern, including increased noise levels, ground vibration, elevated truck and rail traffic, and degraded air quality. For residents along Sylvan Avenue and throughout the West Lenwood area, these impacts are not theoretical. Increased truck traffic, train operations, and industrial activity will directly affect daily quality of life, road safety, emergency access, and long standing rural residential character. Additional impacts include increased light pollution, nighttime operational noise, wear and tear on local roads not designed for heavy industrial traffic, and the cumulative effects of continuous operations near homes. I1894-2

These concerns are further compounded by groundwater-related issues that are particularly sensitive to the Hinkley community. Hinkley has a well-documented history of groundwater contamination and decades of remediation efforts. As a result, residents are understandably cautious about any project that could affect the local groundwater basin or water table. I1894-3

Construction activities, deep grading, pile driving, rail and yard infrastructure, changes to stormwater drainage patterns, hazardous material handling, and increased industrial activity all raise legitimate questions about groundwater drawdown, subsurface disturbance, and potential contamination pathways. For communities such as Hinkley, and west Lenwood, where many residents rely on groundwater and private wells—these concerns deserve heightened scrutiny. I1894-4

I respectfully request that BNSF and the City of Barstow provide clear, transparent, and enforceable commitments related to groundwater protection and community impacts. This should include a detailed evaluation of potential impacts to the water table, long-term groundwater monitoring, protections for private wells, coordination with existing groundwater remediation efforts in Hinkley, and conservative modeling that reflects worst case operational scenarios rather than minimum assumptions.

I further encourage BNSF and the City to work collaboratively with residents of Hinkley, and West Lenwood to identify meaningful mitigation measures. These may include enhanced groundwater monitoring wells, independent third-party oversight, air-quality monitoring stations near residential areas, noise and vibration buffers, landscaped setback zones, truck routing strategies that minimize impacts to residential roads, limits on nighttime operations where feasible, and ongoing community engagement throughout both construction and operation. I1894-5

Progress does not need to come at the expense of community trust. By directly addressing localized impacts, particularly those affecting groundwater, rural neighborhoods, and historically burdened communities, the BIG Project can move forward in a way that balances economic development with environmental responsibility and respect for the people who call this area home.

Thank you for considering these comments and for your continued engagement as the EIR process moves forward.

Respectfully,

John Turner
Community Stakeholder,

RESPONSES TO COMMENT LETTER I1894, JOSH TURNER

I1894-1 See **Consolidated Response 04** concerning general non-CEQA issues.

I1894-2 Comment does not raise a substantive issue on the content of the Draft EIR. See **Draft EIR Section 5.1: Aesthetics**, in regards to potential impacts associated with light pollution and industrial character; **Draft EIR Section 5.3: Air Quality**, in regards to potential impacts associated with air quality; **Draft EIR Section 5.12: Noise**, in regards to potential impacts associated with noise and ground vibration; **Draft EIR Section 5.14: Public Services and Recreation**, in regards to potential impacts associated with emergency services; and **Draft EIR Section 5.15: Transportation**, in regards to potential impacts associated with heavy-duty truck traffic and train operations. Also see **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses. See **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis. See **Consolidated Response 09-06** concerning cumulative impacts to the Sylvan Community.

I1894-3 As discussed in **Draft EIR Section 5.10: Hydrology and Water Quality**, BIG would incorporate permanent stormwater management features, such as detention basins and separators, to treat and manage runoff and maintain water quality standards. As discussed on Draft EIR page 5.10-56, BIG would result in less than significant impacts associated with water quality standards. Also see **Consolidated Response 09-04** concerning consideration of the Sylvan Community in the Hydrology and Water Quality analyses, and **Consolidated Response 09-07** concerning consideration of impacts to Sylvan Community private water wells.

I1894-4 See **Response I1894-3.**

I1894-5 See **Response I1894-3**, **Consolidated Response 06** concerning potential effects on communities**, Consolidated Response 09** concerning BIG's potential effects on the Sylvan Community, **Consolidated Response 09-01** concerning consideration of the Sylvan Community in the Draft EIR and as a sensitive receptor**, Consolidated Response 09-04** concerning consideration of the Sylvan Community in the Hydrology and Water Quality analyses, **Consolidated Response 09-07** concerning consideration of impacts to Sylvan Community private water wells, **Consolidated Response 09-10** concerning consideration of the Sylvan Community in the Hazardous Materials analysis, including arsenic levels/mobilization, **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis**,** and **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses.

Additionally, as noted in **Draft EIR Section 5.1: Aesthetics** (page 5.1-7 and 5.1-8), setback requirements for BIG would be subject to applicable development standards.

Local circulation network impacts are disclosed in **Draft EIR Impact 5.15-1** (pages 5.15-57 through 5.15-60). The Draft EIR concluded that the circulation network access for transit, vehicle traffic, bicycles, and pedestrians would be maintained throughout BIG construction and operations. **Draft EIR Section 1.0 Executive Summary**, **Table 1-2: Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation –**

BIG summarizes the conclusions of the environmental analysis contained in this EIR, including the mitigation measures identified for all significant impacts. The only applicable mitigation measure to circulation/connectivity is related to **MM BIG AQ-9: Truck Idling Limits and Truck Route Signage** (**pages 1-49** and **5.3-106**), which has a required component of minimizing on-site vehicular travel within an identified on-site circulation pattern for BIG. In addition to required mitigation, BNSF has committed to implementing various roadway improvements throughout the community.

The request for ongoing engagement during construction and operation has been noted and provided decision makers for review and consideration.

COMMENT LETTER I1895

I1895

Received by City of Barstow 1/12/26

To whom it may concern,

I am writing this letter as a distressed citizen who is an actual neighbor to this development. I reside in the Sylvan community directly across the street from this proposed project so close we can hit a golf ball into this project. As an involved and concerned citizen I went to multiple BNSF project meetings over the past two years where I brought up multiple concerns.

I brought up issues with the noise. Living very close to this project I am very concerned about the noise levels being created from this project. First, there will be very large levels of increase noise throughout the construction phase. Second, the new "proposed plan" is bringing another main line for BNSF up to and running parallel with Main Street. With these added changes I am very distressed. We can already hear one train off in the distance passing through. Now, by adding that other line right next to Main Street it will be within a few hundred feet of our neighborhood. I1895-1

My largest concern and complaint as far as the noise is the loading and offloading of containers. Yes, BNSF has talked about the energy efficient cranes and other equipment they are planning on using, but I have not seen any "noise studies" on the decibel level of lifting and placing 1,000's of containers on and off of trains 365 days a year 24 hours a day. You can use a "Green Crane" so the engine isn't loud, but lifting and placing metal containers is not a quiet operation no matter how good the operator is.

I brought up issues with traffic. First, the development as proposed would cut off our community from all vital resources. Currently, all food, school, emergency response, etc comes in through Main Street. If no other roads are not put in place this will create significant delays due to the increase in traffic. Also, if there were to be an accident at the entry point to the development at Country Club Drive and Main Street, our neighborhood would be virtually cut off from all resources. I1895-2

Image now being in the unfortunate circumstance of having a heart attack. Image that heart attack is happening during shift change for the Railroad and/or other "indirect employees" of the project. How will an ambulance get to our community? How much longer will our true response time be to get that lifesaving care?

Also, with added congestion through this intersection how long are the proposed delays going to be through this intersection? First, again, this is an entire community's lifeline to all resources, but what about local transit, such as school buses. How much longer will children have to wait on a school bus and get up earlier to ride the same bus due to this increase created by this development? I was told this would be looked into. I1895-3

I brought up concerns about the light pollution. Currently our neighborhood and surrounding area is peaceful and dark when the sun goes down. We are able to look up and see the stars. Better yet, try sleeping facing a project that is as bright as an amusement park right out your window. Unlike Six Flags, this development will be open 24 hours a day 365 days a year. I was told this would be looked into. I1895-4

I brought up concerns with safety, air quality, vibrations, the list goes on and on. I was continuously told we would look into that, and to wait for the EIR. Well, I have waited for the EIR and virtually none of my concerns have been addressed. Every "answer" has been a way of find an excuse to do nothing. As one small example, when it comes to air quality, the EIR lists the impact to be significant and unavoidable. When asked about this I was told the number was so low it wasn't that big of a deal. I don't know about I1895-5

Received by City of Barstow 1/12/26

everyone else out there but an increase in my family's chances of getting cancer increase, or my children's chances of getting cancer increasing is a big deal, no matter how big that increase is. I1895-5 cont.

The reality is our neighborhood is peaceful, quiet, and safe without this project. I can see the upsides of this project for the City of Barstow through future jobs and tax revenue. I am not trying to say the project should not happen. I am just saying that a small neighborhood and their residents should not have to suffer in order for that to happen. We can't the railroad do the necessary adjustments to their plans to my family and my community are not significantly negatively impacted, as currently noted in the areas of air quality, noise pollution, and light pollution on the EIR as currently drafted. I1895-6

Of all the concerns I brought to BNSF listed here I am now being told they will put up a chain link fence. A multi-billion dollar project, and the real "Neighbors" to this project get a chain link fence. That does not sound like anyone is being a "Good Neighbor". I1895-7

One major change that would dramatically improve the issue of noise would be to build a sound wall. One main change for traffic would be to open another route to our neighborhood that doesn't have to go through the Main Street and Country Club Drive intersection, or at least creating turning lanes. I1895-8

I ask BNSF, I ask the Barstow City Council, I ask the San Bernardino County Board of Supervisors, I ask the State Representatives, would you like to live directly across the street from this development? Would you like to have to black your windows out so the light doesn't come into your children's bedrooms? Would you like to hear containers being loaded on and off of trains 24 hours a day 365 days a year? If you wouldn't like to live next to a development that significantly negatively impacting yourself and your family, why would you vote to approve it and force that upon others.

I know a lot of people are very positive and hopeful about this project. I would like to be as well, but in its current format it does too much damage to my health, my home, and my family. I1895-9

Sincerely,

Aaron Heldreth

RESPONSES TO COMMENT LETTER I1895, AARON HELDRETH

I1895-1 The concern regarding noise impacts is acknowledged. See **Consolidated Response10** concerning impacts to the Sylvan community, specifically **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses. **Draft EIR Section 5.12: Noise and Vibration** provides an analysis of the potential noise impacts associated with Project-related construction and operations. Where potentially significant impacts are determined, feasible mitigation measures have been proposed to reduce potential impacts.

I1895-2 The traffic concern, specifically emergency response impairment, is acknowledged. **Draft EIR Section 5.9: Hazards, Hazardous Materials, and Wildfire** includes an analysis of whether project BIG would impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. Impacts were found to be less than significant. Additionally, **Draft EIR Section 5.15: Transportation** provides an analysis of BIG's potential transportation related impacts during construction and operations. No potentially significant transportation-related impacts were identified. Specifically, **Draft EIR Impact 5.15-2** (pages 5.15-66 through 5.15-67) evaluated the potential for BIG to impact emergency access and concluded that impacts would be less than significant. Furthermore, as discussed in **Draft EIR Impact 5.11-1** (pages 5.11-46 through 5.11-50), BIG's proposed circulation and roadway improvements would not physically divide the established communities within the vicinity of BIG. Finally, impacts to public services including fire protection and emergency (medical) response to the Sylvan Community are addressed in **Draft EIR Section 5.14**: **Public Services and Recreation**. The analysis found that BIG would not result in any impacts relative to these issues.

I1895-3 See **Response I1895-2** concerning transportation impacts.

I1895-4 The concern regarding light pollution is acknowledged. See **Consolidated Response 09-05** concerning consideration of the Sylvan Community in the lighting analysis. **Draft EIR Section 5.1: Aesthetics** evaluates the potential for BIG to cause significant environmental impacts to aesthetic resources. **Draft EIR Impact 5.1-4** (pages 5.1-65 through 5.1-75) concluded that despite compliance with City lighting standards and proposed mitigation measures, BIG would still result in a significant and unavoidable impact to light and glare. See **Consolidated Response 02** concerning significant and unavoidable impacts and the Statement of Overriding Considerations.

I1895-5 See **Consolidated Response 09-03** concerning consideration of the Sylvan Community in the Air Quality analysis.

I1895-6 See **Consolidated Response 09,** specifically, **09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses, **09-03 c**oncerning consideration of the Sylvan Community in the Air Quality analysis, and **09-05** concerning consideration of the Sylvan Community in the lighting analysis.

I1895-7 See **Consolidated Response 04** concerning general non-CEQA issues.

I1895-8 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses, and **Response O21-75** concerning the viability of noise wall/noise barrier mitigation. See **Response I1895-2** above concerning transportation and land use impacts.

I1895-9 See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER I1897

Public Comment on Barstow International Gateway Environmental Impact Report

Crystal Heldreth <cbrewuf@hotmail.com>

Mon 1/12/2026 4:42 PM

To:GeneralPlan@barstowca.org <GeneralPlan@barstowca.org>;

[NOTICE: THIS IS AN EXTERNAL EMAIL]
Do not open any suspicious attachments or links. Do not reply to any requests for sensitive information. If in doubt, call the sender to confirm!

Caution! This message was sent from outside your organization.

Dear BNSF Representatives,

I am writing to express my serious concerns regarding the proposed Barstow International Gateway project and the negative impacts it will have on my family and our community. I1897-1

My family and I purchased our home in the Sylvan neighborhood many years ago, directly across from the proposed project site, because it is a quiet, rural, and family-friendly area of the High Desert. We made a long-term investment in this community with the expectation that it would remain a safe and peaceful place to raise our children. However, as outlined in the Environmental Impact Report, our neighborhood will no longer retain these characteristics. According to the report, residents will be significantly impacted by increased noise, train vibrations, light pollution, and vehicle traffic. I1897-2

With the installation of approximately forty rail lines and the continuous movement of shipping containers, the project would generate noise and vibrations around the clock. Research has shown that prolonged exposure to this level of noise and vibration can lead to sleep disruption, increased stress, cardiovascular issues, and other chronic health conditions. These impacts are especially concerning for my family, including my two school-aged daughters. Ongoing sleep disruption would directly affect their health, well-being, and ability to focus and succeed academically. I1897-3

Additionally, the anticipated light pollution from the facility is troubling. Excessive nighttime lighting is known to disrupt circadian rhythms and has been linked to increased risks of sleep disorders, depression, obesity, diabetes, cardiovascular disease, and certain cancers. My daughters' bedroom window directly faces the proposed facility, making these concerns deeply personal and immediate. I1897-4

At present, this project presents a clear win–lose scenario: while BNSF and other areas of Barstow may benefit economically, my family and our neighbors bear the long-term environmental and health consequences. In an effort to be reasonable and to pursue a more balanced, win–win outcome, I respectfully request that BNSF commit to constructing a sound wall between the facility and the Sylvan neighborhood. A sound wall would help mitigate excessive noise and vibrations and would also reduce light pollution impacting nearby homes. I1897-5

Thank you for considering my comments and the real-life impacts this project will have on surrounding residents. I urge BNSF to take meaningful steps to protect the health, safety, and quality of life of the families who have long called this community home. I1897-6

Sincerely,
Crystal Heldreth

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RESPONSES TO COMMENT LETTER I1897, CRYSTAL HELDRETH

I1897-1 This comment is introductory to the comments that follow. See **Consolidated Response 04** concerning general non-CEQA issues.

I1897-2 See **Consolidated Response09** concerning potential impacts to the Sylvan community, specifically **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses, and **Consolidated Response 09-05** concerning consideration of the Sylvan Community in the lighting analysis. **Draft EIR Section 5.15: Transportation** discloses traffic impacts. No potentially significant traffic impacts were identified.

I1897-3 See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses.

I1897-4 See **Consolidated Response 09-05** concerning consideration of the Sylvan Community in the lighting analysis.

I1897-5 See **Consolidated Response 09-02** concerning consideration of the Sylvan Community in the Noise and Vibration analyses. A discussion of lighting impacts is included in **Consolidated Response 09-05** concerning consideration of the Sylvan Community in the lighting analysis and **Draft EIR Section 5.1 Aesthetics**, which also includes mitigation for construction lighting (**MM BIG AES-1**).

I1897-6 This comment is conclusive to the comments that preceded. See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER I1899

Chris Heldreth
Community Development Director
City of Barstow
generalplan@barstowca.org

Subject: Comments on the Draft Environmental Impact Report for City of Barstow General Plan Update and Barstow International Gateway Project (State Clearinghouse Number: 2024020501)

Dear Mr. Heldreth:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the City of Barstow General Plan Update and Barstow International Gateway (BIG) Project (collectively referred to as the "Project"). We would like to begin by expressing our support for the Project and appreciation for the effort that has gone into preparing the environmental analysis. As a nearby property owner for over fifty years, the Vernola Trust is supportive of the Project objectives, and recognizes the benefits the Project will bring to the City and surrounding region. I1899-1

1. Off-Site Utilities Impacts

The portion of the DEIR that addresses the BIG Project provides a helpful overview of on-site utility service. To further enhance the document, it may be useful to include additional clarification regarding any off-site utility infrastructure that could be involved in serving the BIG Project (e.g., water, sewer, electricity, storm drain capacities). Adding further discussion of off-site utility improvements and reasonably foreseeable development as a result of the BIG Project would provide the decisionmakers with more information. I1899-2

2. Transportation and Traffic Impacts

The transportation analysis provides a useful framework for understanding project-related travel patterns. While CEQA now emphasizes vehicle miles traveled (VMT) as the primary transportation impact metric, it may be beneficial to include information regarding whether Project-related traffic could significantly deteriorate surrounding roadway operations or safety conditions.

The BIG Project is expected to introduce additional truck traffic to Hinkley Road and Lenwood Road, which function as key regional connections and primary truck routes linking the project area to State Route 58 (SR-58). Because BIG Project-related traffic could contribute to operational and safety impacts along these corridors, it would be helpful if the DEIR addressed whether the BIG Project proposes improvements to Hinkley Road and Lenwood Road extending from the BIG Project boundary to SR-58. Upgrading these segments to consistent arterial standards could strengthen regional connectivity, reduce potential bottlenecks, and provide I1899-3

more seamless transition between local roadways and the state highway system. Such improvements would also support safer truck operations, improved emergency access, and better alignment with the City's long-term circulation and goods movement objectives. I1899-3 cont'd

Conclusion

Once again, the Vernola Trust thanks the City for an opportunity to comment on the Project DEIR and we look forward to a great Project. In the event that additional or different information about the Project becomes available, we reserve the right to provide further comments I1899-4

Thank you for considering these comments.

Sincerely,

Orion Bondar, on behalf of the Vernola Family

RESPONSES TO COMMENT LETTER I1899, VERNOLA FAMILY

I1899-1 This comment is introductory to the specific comments provided below. See **Consolidated Response 04** concerning general non-CEQA issues.

I1899-2 Additional information pertaining to off-site utility improvements are located in **Draft EIR Appendix 5.17 BIG-1: Utility Assessment Technical Report** and are available to decisionmakers**.** Off-site improvements (off-site rail improvements and off-site non-rail improvements) are described in pages 16 through 18.

Off-site rail improvements include lead track extensions to the east of approximately two miles and lead track extensions to the west of approximately seven miles ("east lead track" and "west lead track"). These off-site rail improvements would be primarily within existing BNSF right-of-way. These improvements would enable trains to safely enter and exit the mainline at mainline speeds, rather than slower "yard" speeds and risk fouling the track. BIG east and west lead tracks would require modifications to existing culverts within the footprint.

Off-site non-rail improvements include ancillary and related stormwater drainage, utility (i.e., water, sewer, electric power, natural gas, and telecommunications), and circulation/roadway improvements and modifications.

I1899-3 As discussed in **Draft EIR Section 3.0 Project Description** (page 3-79), BIG proposes various transportation modifications outside the BIG Specific Plan area. Transportation modifications proposed are depicted on **Draft EIR Figure 3-33: BIG Off-Site Transportation Modifications** (page 3-82). Transportation Modifications (TM) are proposed to improve traffic operations or safety. TMs include modifications such as installing traffic signals, modifying signal timing, striping, and rumble strips, as well as paying fair share costs for future roadway widening by others. TMs identified as fair share would be constructed by others. TMs identified as BIG's responsibility may be implemented as part of BIG's construction or in future years (i.e., Interim Year 2033 or Horizon Year 2048); see **Draft EIR Appendix 5.15 BIG-2: Level of Service Assessment – Transportation Analysis** for additional information. All circulation improvements would be made permanent, except for a temporary Main Street bypass.

As outlined in **Draft EIR Section 5.15 Transportation** (page 5.15-30) and **Draft EIR Appendix 5.15 BIG-1: CEQA Assessment – Transportation Analysis** (page 6), BIG would vacate Hinkley Road between the south side of the Mojave River bridge crossing and Main Street, closing the existing at-grade rail crossing. Hinkley Road would be realigned to run east-west through the transload warehouse center from the south side of the Mojave River bridge crossing to the Jasper Road/Lenwood Road intersection. BIG proposes to reconstruct the existing Hinkley Road bridge over the Mojave River to conform to current federal and State standards. BIG also proposes constructing a bridge for the proposed Hinkley Road to cross the Lenwood Channel.

Transload warehouse center employees and heavy-duty trucks accessing the transload warehouse center would enter BIG from the proposed Hinkley Road/Jasper Road/Lenwood Road intersection. To facilitate access to the proposed transload warehouse center, BIG

proposes to install a traffic signal, roadway widening, and restriping at the proposed Hinkley Road/Jasper Road/Lenwood Road intersection, as depicted in **Draft EIR Figure 5.15-2 BIG Access Improvements** (page 5.15-30).

As discussed in **Draft EIR Appendix 5.15 BIG-1: CEQA Assessment – Transportation Analysis** (page 17), BIG's operational VMT analysis is conducted under Horizon Year 2048 conditions, consistent with the City VMT Resolution. VMT is typically analyzed in the horizon year because it provides a long-term perspective of the effects of projects and plans. The City of Barstow evaluates VMT impacts using a metric known as VMT per service population (VMT/SP), with "service population" reflecting the combined number of residents and employees in the study area. VMT/SP can be calculated using multiple efficiency metrics (e.g., Total VMT/SP, Home Based VMT per Resident, or Home-Based Work VMT per Worker).

As outlined in **Draft EIR Appendix 5.15 BIG-1: CEQA Assessment – Transportation Analysis** (page 17) and **Draft EIR Section 5.15: Transportation** (page 5.15-27), for BIG's analysis under the Project Threshold, the Home-Based Work VMT per Worker metric is used because this metric is most applicable to BIG's industrial-related Specific Plan. It measures the average VMT by workers commuting to and from home, specifically for employees associated with the BIG Specific Plan area. The VMT efficiency of the BIG Specific Plan area is then compared to the citywide average. A significant project impact would occur if BIG's Home Based Work VMT per Worker is higher than the citywide average Home-Based Work VMT per Worker under Horizon Year 2048 conditions.

For BIG's analysis under the Cumulative Threshold, the Total VMT Per Service Population metric is used to quantify VMT/SP, consistent with the City VMT Resolution. For this analysis, the City is evaluated as a whole, both without and with BIG. This differs from the Project Threshold, which compares only BIG to the citywide average. A significant cumulative impact would occur if BIG's implementation causes the citywide Total VMT per Service Population to be higher than the No BIG Baseline under the Horizon Year 2048 conditions.

As noted in **Draft EIR Appendix 5.15 BIG-1: CEQA Assessment – Transportation Analysis** (pages 17 and 18) and **Draft EIR Section 5.15: Transportation** (pages 5.15-66 and 5.15-67), BIG's Home Based Work VMT per Worker is forecast to be less than the citywide average Home-Based Work VMT per Worker under Horizon Year 2048 conditions. Therefore, BIG would have a less than significant VMT impact according to the City's Project Threshold. Additionally, the citywide Total VMT per Service Population is forecast to be lower with BIG than the No BIG Baseline under Horizon Year 2048 conditions. Therefore, BIG would have a less than significant cumulative VMT impact according to the City's Cumulative Threshold. Accordingly, BIG would result in a less than significant VMT impact.

Thus, as discussed above, additional trips would not be expected as a result of the proposed BIG Project; accordingly, additional trips would also not be expected along Hinkley Road.

As described in **Draft EIR Appendix 5.15 BIG-2** (page 241), **TM-9** would provide fair share for widening Lenwood Road between Agate Road to Jasper Road. Prior to the occupancy of the transload warehouse center exceeding 7,800 KSF, BIG would provide 35.59% fair share of the

costs for widening the roadway to 4-lanes. This roadway segment would be improved from LOS F to LOS C or better with widening under Horizon Year (2048) Plus BIG conditions. **TM-9** would improve conditions on Lenwood Road for those travelling to and from SR-58.

As described in **Draft EIR Appendix 5.15 BIG-2** (page 241), **TM-10** would provide fair share for widening Lenwood Road between Main Street to High Desert Road. Prior to the occupancy of the transload warehouse center exceeding 7,800 KSF, BIG would provide 33.13% fair share of the costs for widening the roadway to four lanes. This roadway segment would be improved from LOS F to LOS D with widening under Horizon Year (2048) Plus BIG conditions.

No changes to the Draft EIR are necessary.

I1899-4 See **Consolidated Response 04** concerning general non-CEQA issues.

COMMENT LETTER I1991

I1991

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

City of Barstow
Received:
JAN 12 2026
Initial: JA
City Clerk Services

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I1991-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. 30 minutes was the time limit at I1991-2

EDs in hospitals for arrival of on call mds., psychologists. Silver Lakes has 4. I1991-3
30 min test is the drive time to 3 hospitals.

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I1991-4

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I1991-5
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. Air, noise pollution are concerns I1991-6
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I1991-7
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I1991-8

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I1991-8 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I1991-9

Sincerely,

Signature: Jeanne Tissier (You can remain anonymous if you prefer.)
Print Name: Jeanne Tissier, clinical psychologist, retired.
Mailing Address: P.O.B. 1786
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

I served in Barstow area residents including BNSF employees for @ 30 years. I appreciate every ones support in saving Silver Lakes residents lives I1991-10

RESPONSE TO COMMENT LETTER I1991, JEANNE TISSIER

I1991-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 06-04** concerning quality of life, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, and **Consolidated Response 10-01** concerning general accessibility concerns at Silver Lakes/Helendale Community at-grade crossings.

I1991-2 See **Consolidated Response 08-01** concerning increased rail activity's effects on traffic delays (including movement of residents and workers) at at-grade crossings; **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings; **Consolidated Response 08-03** concerning emergency response delays at at-grade crossings; **Consolidated Response 10-03** concerning emergency response delays at Silver Lakes/Helendale Community at-grade crossings; and **Consolidated Response 10-04** concerning traffic delays and school transportation needs at Silver Lakes/Helendale Community at-grade crossings.

I1991-3 See **Consolidated Response 06-01** concerning the geographic scope of the environmental analysis and definition of study area; **Consolidated Response 06** concerning potential effects on communities; and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1991-4 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings; **Consolidated Response 08-03** concerning emergency response delays at at-grade crossings; **Consolidated Response 10-03** concerning emergency response delays at Silver Lakes/Helendale Community at-grade crossings; **Consolidated Response 10-04** concerning the increased rail activity's effects regarding traffic delays and school transportation needs at Silver Lakes/Helendale Community at-grade crossings; **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans; **Consolidated Response 05** concerning feasible and enforceable mitigation; and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1991-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including derailments, spills, and emergency response planning; and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1991-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/Helendale Community, **Consolidated Response 06** concerning potential effects on communities (including small rural and unincorporated communities), and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1991-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or alternative access route) in the Silver Lakes/Helendale Community, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I1991-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1991-9 See **Consolidated Response 06-01** concerning the geographic scope of the environmental analysis and definition of study area; **Consolidated Response 05** concerning feasible and enforceable mitigation; **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1991-10 See **Consolidated Response 06-03** concerning community safety; **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings; and **Consolidated Response 10-03** concerning emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings; and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

COMMENT LETTER I1994

I1994

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

RECEIVED
JAN 12 2026

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I1994-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I1994-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I1994-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I1994-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I1994-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I1994-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I1994-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I1994-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I1994-8

Sincerely,

Signature: Ashley Ward (You can remain anonymous if you prefer.)
Print Name: Ashley Ward
Mailing Address: P.O. box 2187
Helendale, CA 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

Mamma with small kids that need DR.S
I want an overpass to reduce the risk of harm to my children due to train delays blocking my way onto the highway. I1994-9

RESPONSE TO COMMENT LETTER I1994, ASHLEY WARD

I1994-1 See **Consolidated Response 06** concerning potential effects on communities; **Consolidated Response 06-03** concerning community safety; **Consolidated Response 06-04** concerning quality of life; **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community; and **Consolidated Response 10-01** concerning general accessibility concerns at Silver Lakes/Helendale Community at-grade crossings.

I1994-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings; **Consolidated Response 08-03** concerning emergency response delays at at-grade crossings; **Consolidated Response 10-03** concerning emergency response delays at Silver Lakes/Helendale Community at-grade crossings; and **Consolidated Response 10-04** concerning traffic delays and school transportation needs at Silver Lakes/Helendale Community at-grade crossings.

I1994-3 See **Consolidated Response 06-01** concerning the geographic scope of the environmental analysis and definition of study area; **Consolidated Response 06** concerning potential effects on communities; and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1994-4 See **Consolidated Response 08-03** concerning emergency response delays at at-grade crossings; **Consolidated Response 10-03** concerning emergency response delays at Silver Lakes/Helendale Community at-grade crossings; **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings; **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings; **Consolidated Response 10-04** concerning the increased rail activity's effects regarding traffic delays and school transportation needs at Silver Lakes/Helendale Community at-grade crossings; **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans; **Consolidated Response 05** concerning feasible and enforceable mitigation; and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., grade separation or alternative access route) in the Silver Lakes/Helendale Community.

I1994-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including derailments, spills, and emergency response planning; and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1994-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/ Helendale Community, **Consolidated Response 06** concerning potential effects on communities (including small rural and unincorporated communities), and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1994-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade

separation (overpass) or alternative access route) in the Silver Lakes/Helendale Community, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I1994-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1994-9 See **Consolidated Response 06-03** concerning community safety; **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings; **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 05** concerning feasible and enforceable mitigation; **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community; and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

COMMENT LETTER I1995

BIG DEIR – Silver Lakes/Helendale

Comment regarding Barstow International Gateway (BIG) Draft Environmental Impact Report (DEIR)
Deadline for comments – January 5, 2026

Mail To: City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

RECEIVED
JAN 12 2026

I1995

E-Mail To: generalplan@barstowca.org

Cc: First District Supervisor Paul Cook (Supervisor.cook@bos.sbcounty.gov)
Luther Snoke, CEO, San Bernardino (Luther.Snoke@cao.sbcounty.gov)

Subject: Public Comment on BIG DEIR – Impacts to Silver Lakes / Helendale

Please accept the following comments as my personal concerns regarding the proposed BIG project. As a resident of Silver Lakes/Helendale I am deeply concerned about the impact that the BIG project will have on our community's safety, accessibility, and overall quality of life. Silver Lakes is home to thousands of residents, including teachers, healthcare professionals, BNSF employees, and other critical workers who commute throughout the High Desert region. I1995-1

Our community already experiences frequent and extended delays at the Vista Road railroad crossing, our primary point of ingress and egress. With the potential increase in rail activity expected from the BIG project, these delays will worsen, posing even greater serious risks for emergency response times, school transportation, and the daily movement of ambulances, residents and workers. I1995-2

It is unfortunate that the negative impact to our community, which is only four miles from the project, was not considered or addressed in the DEIR. I respectfully request that the DEIR and Final EIR clearly address the following issues specific to the Silver Lakes/Helendale community: I1995-3

- **Emergency Access**: Impacts on emergency response times for paramedics, fire, and law enforcement, as well as school transportation and evacuation needs, and identify feasible mitigation measures, including the construction of a grade separation (overpass) or an alternative access route for Silver Lakes. I1995-4
- **Hazardous Materials**: Provide a clear disclosure and disaster response plan that will address potential spills, derailments, and other emergencies. I1995-5
- **Cumulative Impacts**: Evaluate how the project's rail expansion will affect small rural unincorporated communities such as Silver Lakes/Helendale as well as Oro Grande that will be affected by rail movement. I1995-6
- **Mitigation Commitment**: Ensure that the Final EIR includes clear and enforceable commitments to fund or support grade separated access improvements or I1995-7

BIG DEIR – Silver Lakes/Helendale

equivalent emergency access solutions for Silver Lakes/Helendale before project operations increase train traffic through our area. I1995-7 cont'd

Thank you for considering these concerns. I respectfully request that Silver Lakes/ Helendale be included in the environmental impact analysis to ensure that appropriate mitigation measures are implemented to maintain safe access to our community. I1995-8

Sincerely,

Signature: Michelle Kooiman (You can remain anonymous if you prefer.)
Print Name: Michelle Kooiman
Mailing Address: P.O. 3395
Helendale, CA 92342 Helendale Ca. 92342

Please feel free to hand write any additional concerns below about experiences you have had with the railroad tracks being blocked.

I am a healthcare provider for the Veterans who on a daily basis must travel to get to work. This delay/re-routing is detrimental to my daily drive and daily life. An alternative must be looked at for Helendale and surrounding cities. I1995-9

RESPONSES TO COMMENT LETTER I1995, Michelle Kooiman

I1995-1 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 06-03** concerning community safety, **Consolidated Response 06-04** concerning quality of life, and **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings.

I1995-2 See **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays (including movement of residents and workers) at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays, and **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I1995-3 See **Consolidated Response 06-01** concerning the geographic scope of the environmental analysis and definition of study area, **Consolidated Response 03** concerning recirculation of the Draft EIR, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1995-4 See **Consolidated Response 06-03** concerning community safety, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, **Consolidated Response 10-03** concerning the increased rail activity's effects on emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 10-04** concerning traffic delays and school transportation needs at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 07** concerning potential impacts related to hazardous materials, including concerning evacuation plans, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1995-5 See **Consolidated Response 07** concerning potential impacts related to hazardous materials, including derailments and emergency response planning, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1995-6 See **Consolidated Response 10-05** concerning cumulative impacts to the Silver Lakes/ Helendale Community, **Consolidated Response 06** concerning potential effects on communities (including small rural and unincorporated communities), and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.

I1995-7 See **Consolidated Response 05** concerning feasible and enforceable mitigation, **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or alternative access route) in the Silver Lakes/Helendale Community,

Consolidated Response 10-01 concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings, and **Consolidated Response 10-03** concerning emergency response delays at Silver Lakes/Helendale Community at-grade crossings.

I1995-8 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community, **Consolidated Response 05** concerning feasible and enforceable mitigation, and **Consolidated Response 10-06** concerning feasible and enforceable mitigation (e.g., construction of a grade separation (overpass) or an alternative access route) in the Silver Lakes/Helendale Community.

I1995-9 See **Consolidated Response 06** concerning potential effects on communities, **Consolidated Response 06-04** concerning quality of life, **Consolidated Response 08-01** concerning the increased rail activity's effects on traffic delays at at-grade crossings, **Consolidated Response 10-02** concerning the increased rail activity's effects on traffic delays at Silver Lakes/Helendale Community at-grade crossings; **Consolidated Response 08-03** concerning the increased rail activity's effects on emergency response delays at at-grade crossings; and **Consolidated Response 10-03** concerning emergency response delays at Silver Lakes/Helendale Community at-grade crossings, **Consolidated Response 10-01** concerning the increased rail activity's effects on emergency access at Silver Lakes/Helendale Community at-grade crossings, and **Consolidated Response 10** concerning BIG's potential effects on the Silver Lakes/Helendale Community.