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SENT VIA E-MAIL: January 9, 2026
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Chris Heldreth, Community Development Director
City of Barstow
220 E. Mountain View Street, Suite A
Barstow, CA 92311

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).

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.

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.

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.

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.

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.

Sincerely,

Sam Wang

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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]

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.

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.

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.

[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.

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.

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

[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]

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.

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]

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.

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

[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]

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.

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.

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[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.

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]

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.

[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.

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.

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.

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.

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

[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.

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.

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.

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.

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

[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.

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.

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.

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

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.

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.

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.

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.

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.

[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.

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.

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]

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

[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.

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.

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.

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

[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.

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.

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.

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

[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]

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.

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).

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

[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.

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.

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.

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.

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.

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.

[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.

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:

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.

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.

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.

[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.

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.

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.

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.

[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.