Former Manufactured Gas Plant
Bakersfield, California

Initial Study
Mitigated Negative Declaration

October 2024

Pacific Gas and Electric Company

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Acronyms and Abbreviations

§	section
AB	Assembly Bill
API	area of potential impacts
Bakersfield	City of Bakersfield
bgs	below ground surface
BMP	best management practice
BSA	Biological Study Area
CalEEMod	California Emissions Estimator Model
CAPCOA	California Air Pollution Control Officers Association
C-C	Commercial Center
CEQA	California Environmental Quality Act
CFR	*Code of Federal Regulations*
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
CRHR	California Register of Historical Resources
CRS	cultural resources specialist
dBA	A-weighted decibel
DTSC	California Department of Toxic Substances Control
GAMAQI	*Guidance for Assessing and Mitigating Air Quality Impacts*
FEMA	Federal Emergency Management Agency
GHG	greenhouse gas
MBHCP	*Metropolitan Bakersfield Habitat Conservation Plan*
MGP	manufactured gas plant
MM	mitigation measure
MMT	million metric ton(s)
MS4	municipal separate stormwater system
MT	metric-ton(s)
MUC	Mixed Use Commercial
NAAQS	National Ambient Air Quality Standards
NPDES	National Pollutant Discharge Elimination System
OPR	Governor's Office of Planning and Research
PAH	polycyclic aromatic hydrocarbon
PG&E	Pacific Gas and Electric Company
PM_{10}	particulate matter with aerodynamic diameter equal to or less than 10 micrometers
$PM_{2.5}$	particulate matter with aerodynamic diameter equal to or less than 2.5 micrometers

R-MP	Mineral and Petroleum
ROW	right-of-way
SB	Senate Bill
SJVAPCD	San Joaquin Valley Air Pollution Control District
SO_2	sulfur dioxide
SPAL	Small Project Analysis Level
SR	State Route
SVA	Standard Voluntary Agreement
TCR	Tribal Cultural Resource
TPH	total petroleum hydrocarbons
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
VOC	volatile organic compound
VMT	vehicle miles traveled
VHFHSZ	very high fire hazard severity zone

1 Background Information

1.1 Project Title

Former Manufactured Gas Plant, Bakersfield, California

1.2 Lead Agency Name and Address

California Department of Toxic Substances Control
1515 Tollhouse Road
Clovis, CA 93611

1.3 Lead Agency Contact Person and Phone Number

Ryan Mitchum, P.G.
Engineering and Special Projects Branch – Clovis Office
California Department of Toxic Substances Control
1515 Tollhouse Road
Clovis, CA 93611
559.297.3958

1.4 Project Location

Pacific Gas and Electric Company's (PG&E's) former manufactured gas plant (MGP) property is located on 20th Street between P and Q Streets in the city of Bakersfield (Bakersfield), California, about 400 feet west of Central Park (Figures 1-1 and 1-2). Figure 1-3 shows the three existing access points to the property on P, 20th, and Q Streets. The project site, which includes the former MGP property and approximately 700 square feet of the adjacent P Street right-of-way (ROW), is at an elevation of approximately 405 feet above mean sea level. The area is highly developed with light industrial, commercial, recreational, and residential uses, and vegetation is limited to landscaped and ornamental trees along 20th and Q Streets (Figure 1-3). The former MGP property covers approximately 0.78 acre and is registered by the Kern County Assessor as Parcel Number 005-252-04. The total project site covers 0.79 acre.

1.5 Project Sponsor's Name and Address

Ken Simas, P.G.
Senior Consulting Project Manager
Environmental Remediation
PG&E
300 Lakeside Drive
Oakland, CA 94312-3534

1.6 General Plan Designation

Mixed Use Commercial (MUC) land use designation (Bakersfield 2021c)

1.7 Zoning

Bakersfield's zoning map indicates that the project site is in the Civic Center (C-C) commercial zone (Bakersfield 2023b). However, Bakersfield's zoning code, last updated December 13, 2023, defines C-C as the Commercial Center zone (*Bakersfield Municipal Code*, Title 17.26).

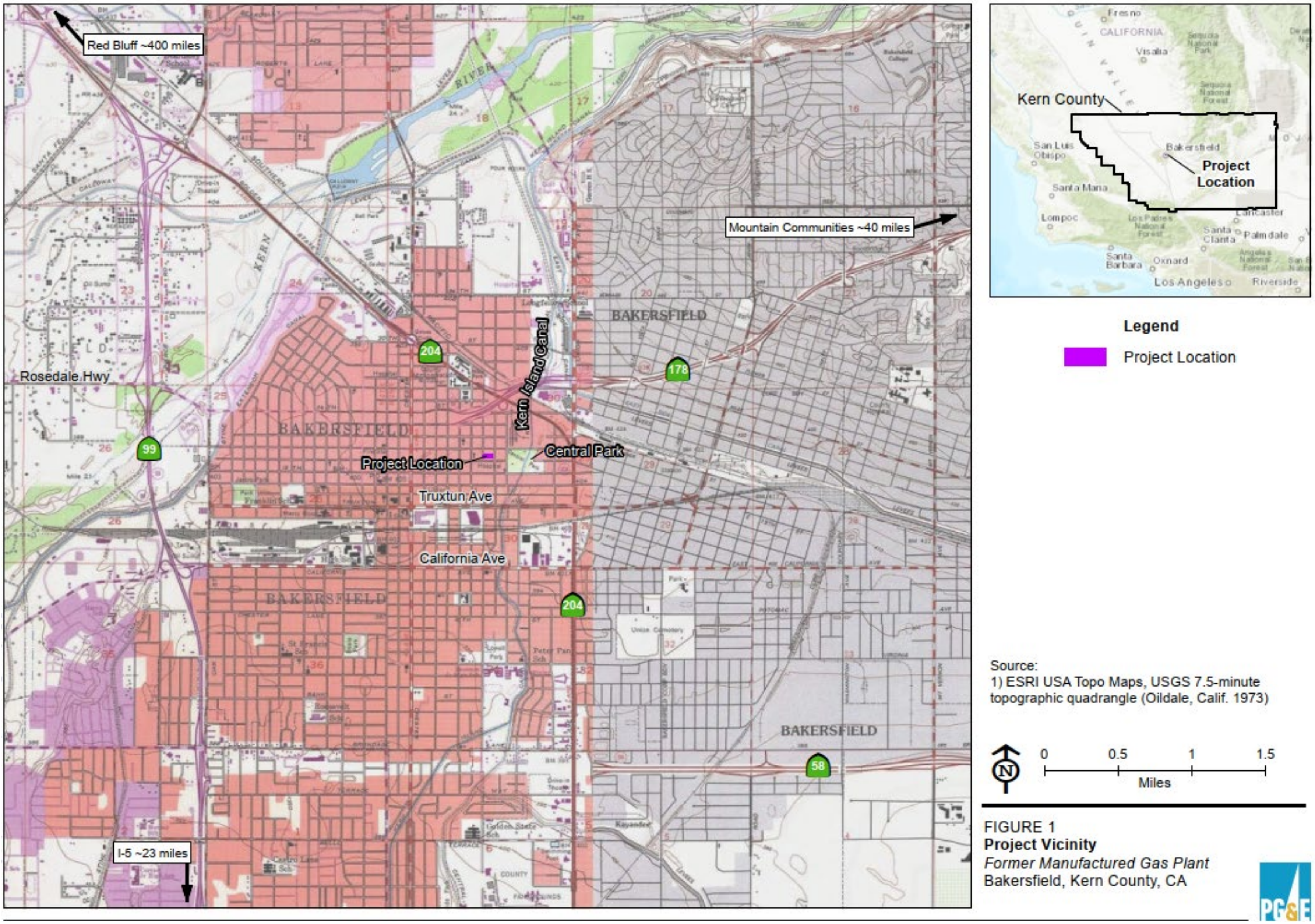
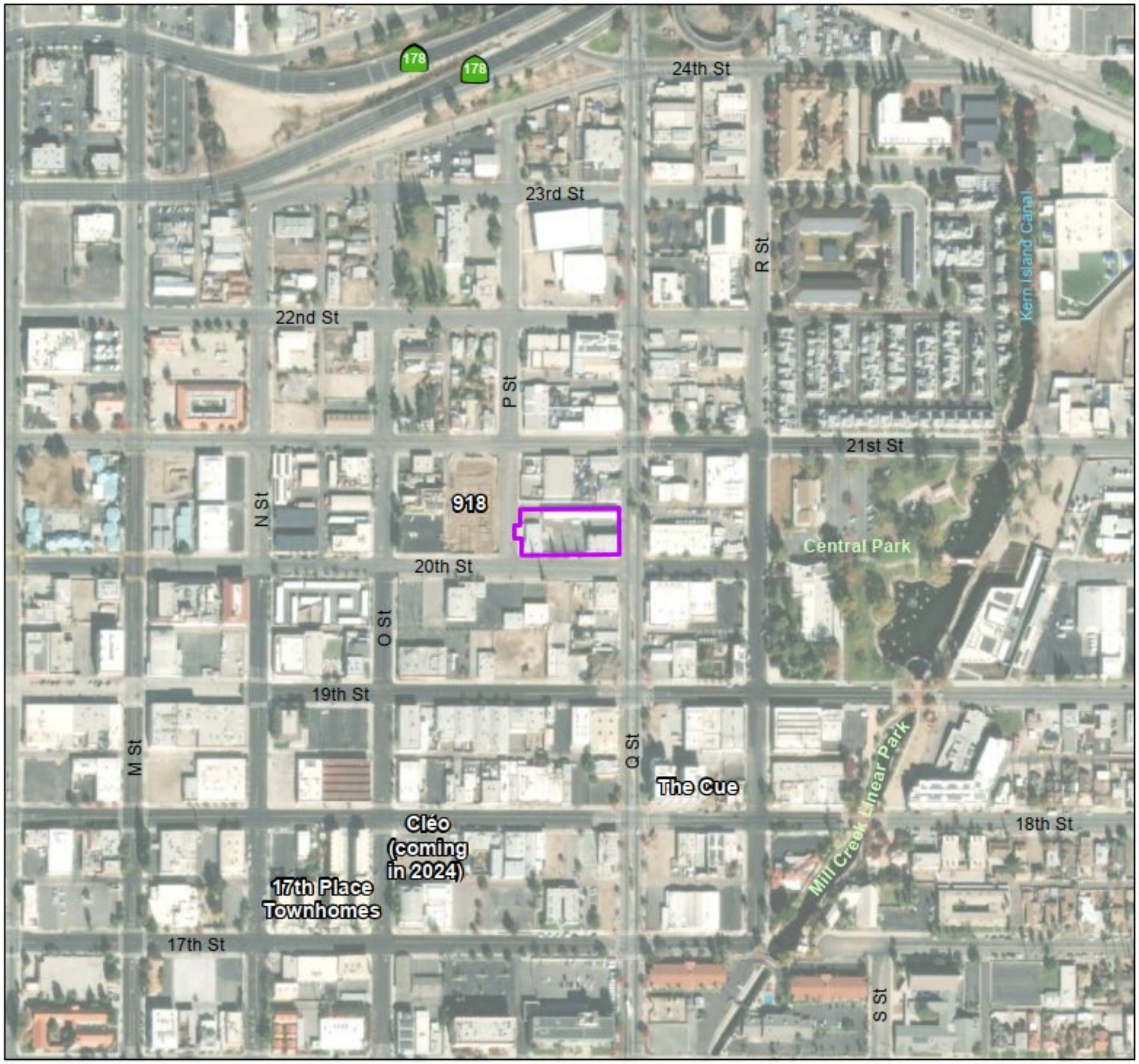


Figure 1-1. Project Vicinity



Legend

Project Site

Source:
1) ESRI World Imagery, 11/24/2022

N

0 250 500 750
Feet

FIGURE 2
Project Area
Former Manufactured Gas Plant
Bakersfield, Kern County, CA

Figure 1-2. Project Area

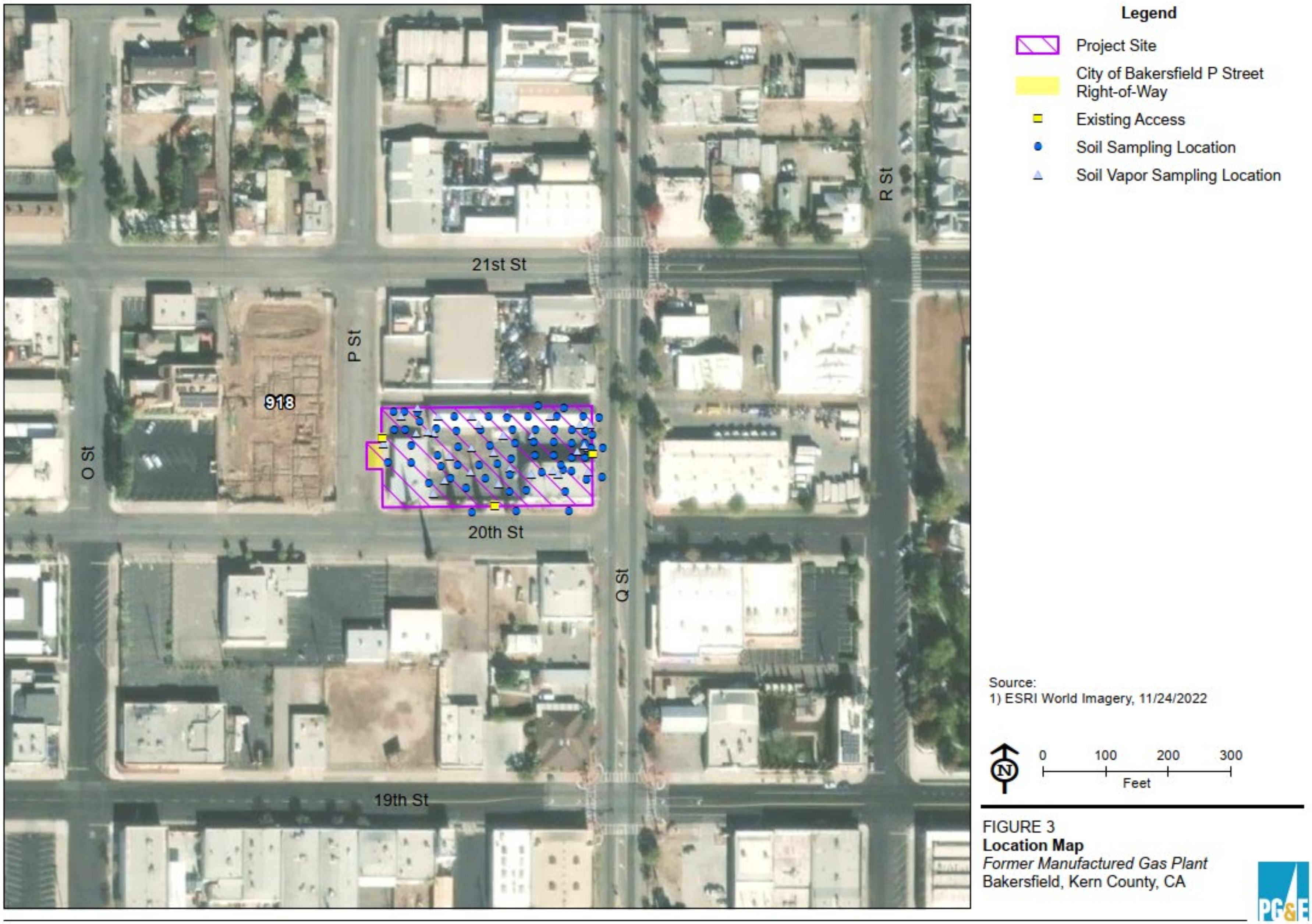


Figure 1-3. Project Footprint

1.8 Project Description

Operations at the former MGP in downtown Bakersfield occurred from 1888 until 1910. The former MGP was on stand-by from 1910 into the mid-1940s, when the MGP structures were dismantled and removed, and the property was redeveloped. The property was subsequently used for automotive-related services until 2019. PG&E owned the property from the mid-1940s into the mid-1970s, and then repurchased it in 2019 for remediation and site closure, with the goal of selling the property for future redevelopment.[1]

Since 2017, the project site has been investigated and assessed for the presence of hazardous materials on behalf of PG&E. The first such investigation, documented in a Phase I Environmental Site Assessment (AEC 2017), indicated the potential presence of MGP residues and solvents, evidence of former underground fuel storage tanks onsite, and dry cleaning and laundry services on adjacent properties. Subsequent investigations (Optimal Technology 2017; AEC 2018; Jacobs 2023b) involved collection and analysis of the following:

- Soil samples from about 60 soil borings to test for volatile organic compounds (VOCs), total petroleum hydrocarbons (TPH), polycyclic aromatic hydrocarbons (PAHs), and metals (including lead)
- Soil vapor samples from about 30 sampling probes to test for VOCs, TPH, and naphthalene

Groundwater was not encountered during these investigations because depth to groundwater at the site has been estimated at approximately 67 feet below ground surface (bgs) (AEC 2017). Because the project site was previously cleared and used for industrial purposes, no vegetation is present within the 0.79-acre area. Current conditions include concrete or asphalt paving and chain-link fencing with access gates.

Based on the 2017 and 2018 reports, PG&E entered into Standard Voluntary Agreement (SVA) HAS-FY21-22-006 with the Department of Toxic Substances Control (DTSC) in 2021 to govern subsequent investigations and remediation of the project site. The *Remedial Action Plan* (Jacobs 2023a), prepared in accordance with the SVA requirements, included an analysis of remediation alternatives and description of the recommended alternative. The SVA also directs PG&E to submit all the information necessary for DTSC to meet the California Environmental Quality Act (CEQA) obligations of a lead agency. Therefore, this Initial Study has been prepared to document the analysis of the recommended remediation alternative identified in the *Remedial Action Plan*. The recommended remediation alternative is otherwise known as the proposed remedy and is referred to herein as the project.

The project consists of soil excavation, site restoration, and, if required, institutional controls with four primary elements as described in Sections 1.8.1 through 1.8.4. The purpose of the project is to allow the former MGP property to be redeveloped for commercial or residential purposes at some point in the future,[2] after post-construction sampling indicates that acceptable concentrations of soil and soil vapor contaminants have been met.

During construction, the existing perimeter fence would encompass the 0.78-acre PG&E parcel workspace, including the exclusion, decontamination, and support zones. Additional fencing would be installed around working areas in the P Street ROW as needed. If the existing fence must be removed during construction, temporary fencing would be installed until the permanent fence can be restored.

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[1] In 2019, three buildings previously used for automotive-related services still stood on the project site. Over the last several years, while the property has been vacant, incidents of breaking and entering and vandalism have increased. The continued presence of the vacant buildings posed a safety hazard, and they were demolished in June 2024 as part of a separate action statutorily exempted from the requirements of CEQA in accordance with 14 California Code of Regulations § 15268, Ministerial Projects. Bakersfield issued a building permit for demolition of the buildings on August 18, 2023, extended the permit on April 15, 2024, and did not require any other permit or license for that action. Therefore, the demolition met the definition of a ministerial project in accordance with § 15268(b)(1), Issuance of building permits.

[2] The potential for and type of future development is unknown at this time and, thus, is not included in the action evaluated herein or as a contributing factor to future indirect or cumulative impacts. Future onsite developments will be considered separate CEQA actions and will be subject to CEQA compliance prior to construction or implementation.

1.8.1 Excavation

Any slabs, foundations, or other surface materials and debris (asphalt and concrete) remaining from the buildings demolished in June 2024 would be removed. As these materials are removed, attached soil would be scraped off and segregated as excavated soil. The asphalt and concrete would then be transported to and disposed of at a permitted recycling or disposal facility.

The soils within the project site would then be excavated to a maximum depth of 15 feet bgs. Excavation would be 6 feet deep or less across approximately 90 percent of the project site. Two areas would be excavated up to 10 and 15 feet deep in the northwestern and southwestern quadrants, respectively. Final excavation limits would be based on the sampling results collected from the limits of the excavation and associated evaluation of soil contaminant concentrations. The evaluation would focus on whether the results meet the acceptable concentrations proposed for the residential scenario.

Materials would be stockpiled within the perimeter fence to the extent possible or loaded directly into haul trucks, and stockpiles of contaminated soil would not be placed directly on bare ground. Plastic sheeting of suitable thickness would be placed on the ground before stockpiled soil is deposited. Stockpiled soil would also be covered with plastic sheeting of suitable thickness and secured with sandbags and other anchoring devices. Stockpiles would be surrounded by a perimeter berm constructed of clean material (e.g., straw wattles) placed under the edge of the liner. The stockpile cover would extend over the outer edges of the perimeter berm and liner to prevent rainfall from entering the stockpile. Ultimately, about 7,300 tons (5,832 “loose” cubic yards) of excavated soil would be transported to and disposed of at permitted disposal facilities.

Soil excavation would also include removal of foundations and remnants of former MGP structures, and MGP wastes and residues within the fill material. Subsurface features associated with historical MGP operations encountered during the excavation would be managed in accordance with applicable regulatory requirements.

Excavated soils would be transported by truck to one or more offsite waste facilities using 18-wheeler end-dump trucks or, as needed, other U.S. Department of Transportation-permitted transport vehicles. A trucking company licensed to transport hazardous materials would be used to transport any hazardous soils removed from the site. Trucks carrying hazardous materials would be covered with a secure tarp and decontaminated prior to leaving the site. On average, up to 20 trucks per day (2 to 3 per hour over the course of an 8-hour day) would leave the site when waste is being hauled away, for an estimated total of 365 trucks transporting excavated soils offsite.

Transportation routes to the disposal facilities are anticipated to remain on paved local streets, state highways, and interstates. Waste Management facilities in Buttonwillow and McKittrick, California, are potential candidates; these disposal facilities are 30 and 40 miles west of the project site, respectively. Ultimately, disposal location(s) would be selected by the contractor in accordance with federal, state, and local requirements.

1.8.2 Restoration

Following excavation and post-excavation sampling (see Section 1.8.3, *Sampling*), the excavated areas would be backfilled with approximately 4,244 loose cubic yards of clean, imported soil free from contamination and debris. Backfill soil quality would be evaluated in accordance with the *DTSC Information Advisory Clean Imported Fill Material Fact Sheet* (DTSC 2001), including the selection of analytes and sample frequency for evaluating the suitability of the backfill. The newly backfilled areas would be graded to the appropriate level required for surface restoration. The new surface would also be graded to support proper drainage and future development. Finally, the dirt surface of the site would be covered in about 6 inches of compacted gravel, which totals about 692 loose cubic yards. Backfill transport to the site would require about 319 trucks, and gravel transport would require about 46 trucks.

Temporary fencing would be removed, and damaged or removed perimeter fencing would be replaced. If Bakersfield sidewalks are damaged or destroyed during project construction, they would be replaced in accordance with Bakersfield requirements. Project construction would not affect the trees south and east of the project site.

Site restoration is also expected to include installation of soil vapor probes as necessary to confirm that post-construction soil vapor concentrations are consistent with the planned use(s) of the site. The number and location of soil vapor probes would be determined in consultation with DTSC before probe installation.

1.8.3 Sampling

The project includes two rounds of sampling (Figure 3) to assess the presence of contaminants in soil and soil vapor: (1) after excavation and prior to backfilling and (2) after site restoration is complete.

1) Soil samples would be collected from the lateral and vertical limits of the excavated void to evaluate whether the soil contaminant concentrations meet the acceptable concentrations proposed for the residential scenario. The samples would be analyzed for VOCs, TPH, PAHs, metals, and lead.
2) Soil vapor would be monitored at least three times using the probes installed during site restoration. Soil vapor samples would be collected from depths up to 15 feet bgs, and the samples would be analyzed for VOCs and naphthalene.

1.8.4 Institutional Controls

If required, PG&E and DTSC would determine institutional controls to be implemented following the post-construction soil vapor sampling. If required, institutional controls may include the following elements:

- Land use controls to restrict access and use of the site via land use covenants or deed restrictions, fences, and permits.
- A soil management plan to govern the treatment of soils if contaminated soils are disturbed in the future. This plan would specify how contaminated soils would be identified, characterized, handled, and disposed of.
- Signage at the site notifying potential excavators of the presence of contaminated soils and identifying soil disturbance and management requirements.
- Restrictions on future subdivisions of, or change in use of, the property without DTSC confirmation that such subdivisions or uses would not result in unacceptable risks.

The institutional controls would be recorded with Kern County and attached to the title deed so they can be transferred to any future property owners.

1.8.5 Temporary Construction Impacts

Excavation along the western side of the former MGP property would extend to the edge of the sidewalk, which is about 5 feet past the PG&E parcel boundary and into Bakersfield's ROW. To restore the sidewalk, the contractor would need additional room to maneuver equipment. To accomplish this work outside of PG&E's parcel, which would take approximately 10 working days, the contractor would obtain permission to use a 35-foot-long by 20-foot-wide portion of Bakersfield's P Street ROW as part of the Street Permit application process.

Construction-related activities are anticipated to take approximately 4 months and would likely result in a temporary, short-term increase in local traffic from construction-related workforce traffic and equipment and material deliveries. Traffic control measures, such as cones, signs, and flaggers, would be developed in a traffic control plan and implemented on 20th, P, and Q Streets to direct and manage traffic around the site. When excavation extends into the sidewalks on P Street, the northbound lane would be closed, and flaggers would direct motorists to alternate using the southbound lane. This short-duration lane closure would occur during construction hours for about 2 weeks.

To minimize potential traffic impacts on busier Q Street, only the access points on 20th and P Streets would be used, and trucks would enter via one of the access points and exit via the other. Truck loading would occur within the site boundary to the extent possible. Pedestrians may be directed to sidewalks on the opposite sides of the adjacent streets to avoid the construction zone and access points.

Traffic-generating construction activities would consist of the daily arrival and departure of construction workers and other onsite personnel traveling to and from the project area and trucks hauling equipment and materials to and from the project site. Approximately 50 trips per day would be generated by workers and haul trucks. About eight workers would be onsite daily, and it is anticipated that they would use on-street parking near the project site. State-licensed transporters would truck an estimated 365 truckloads of soil, rubble, and other materials offsite. Trucks would operate Monday through Friday between 7:00 a.m. and 5:00 p.m.

Within the 0.78-acre PG&E parcel, temporary facilities and utilities, such as an office trailer, sanitation facilities, power, lighting, and telephones would be constructed or installed as necessary for use by onsite personnel. Active utility lines in the work areas would be properly protected or temporarily rerouted according to the utility owner's specifications. Efforts would be made to minimize interruptions to utility service during rerouting activities.

1.9 Surrounding Land Uses and Setting

The project site is in an older, highly developed section of downtown Bakersfield. Current land uses in the area include light industrial and commercial activities, residential clusters, and community spaces such as churches, schools, a park, and museums. Most structures are one- to three-stories, and overhead power and telephone lines border most of the streets. Outside of Central Park, vegetation is generally limited to landscaped and ornamental trees along the streets, or weeds and shrubs on vacant lots. The closest existing residences are about 300 feet north of the site on P Street, but a new apartment building is under construction (ready for occupancy in summer 2024) adjacent to the site across P Street. The Kern Island Canal, which flows through two ponds in the Mill Creek Linear Park about 0.2 mile east of the project site, is the only waterbody in the area.

1.10 Other Public Agencies Whose Approval Is Required

PG&E anticipates the following permits:

- Bakersfield Building Permit (for excavation and grading activities and installation of temporary office trailers or temporary power drops).
- Bakersfield Encroachment Permit (for installation of temporary fixtures in the P Street ROW).
- Bakersfield Street Permit (for work within the P Street ROW). PG&E's traffic control plan would be submitted to Bakersfield for review and approval as part of this permit.

1.11 Consultation with California Native American Tribes

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

DTSC complied with the 2014 Assembly Bill 52 (AB52) by consulting with Native American tribes as appropriate in accordance with Public Resources Code Section (§) 21080.3.1. DTSC provided written notification to seven tribes on the Tribal Consultation List from the Native American Heritage Commission (NAHC) regarding the Proposed Project in July 2024. The notice included a brief project description, project location, and lead agency's contact information. DTSC did not receive interest from any Tribal governments contacted.

Based on the Proposed Project Site location, history, and absence of cultural resource findings during prior Site work, it is not likely that historical resources would be identified or impacted during remedial actions. However, if historical resources are discovered during remedial actions, then work would stop in that area until a qualified archaeologist or appropriately licensed professional can assess the significance of the find and, if necessary, develop appropriate response measures in consultation with the DTSC and other agencies and Native American representatives, as appropriate. Please refer to the Tribal Cultural Resources analysis (Section 18) for additional information.

2 Environmental Determination

2.1 Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project; that is, they would involve at least one impact that is a “Potentially Significant Impact,” as indicated by the resource-specific checklists on the following pages.

☐ Aesthetics	☐ Agriculture/Forestry Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology/Soils	☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials
☐ Hydrology/Water Quality	☐ Land Use/Planning	☐ Mineral Resources
☐ Noise	☐ Population/Housing	☐ Public Services
☐ Recreation	☐ Transportation	☐ Tribal Cultural Resources
☐ Utilities/Service Systems	☐ Wildfire	☐ Mandatory Findings of Significance

2.2 Determination

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

09/26/2024

Signature *Date*

3 Evaluation of Environmental Impacts

3.1 Aesthetics

Table 3-1. Aesthetics Checklist

Except as provided in Public Resources Code Section 21099, would the project:	**Potentially Significant Impact**	**Less-Than-Significant with Mitigation Incorporated**	**Less-Than-Significant Impact**	**No Impact**
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In nonurbanized areas, substantially degrade the existing visual character or quality public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	☒
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

3.1.1 Setting

Public Resources Code § 21099 is not applicable to this project because the project is not a residential, mixed-use residential, or employment center project.

The site is located in downtown Bakersfield, and the area is flat with little to no slope. Surrounding land uses within view of the site include light industrial, commercial, a vacant lot, and a church. By the time construction begins, the adjacent three-story apartment building will be ready for occupancy and residents will also have a direct view of the site. Most structures are one to three stories, and overhead power and telephone lines border the streets. Vegetation is generally limited to landscaped and ornamental trees along the streets, or weeds and shrubs on vacant lots. No vegetation is present within the 0.79-acre project site. Current conditions include concrete or asphalt paving and chain-link fencing with access gates.

Because of the site’s location in a flat, urban area with buildings ranging from one to three stories, visibility to and from the site is limited to adjacent roads and buildings on all sides. The project site is not within view of any sensitive visual resources such as scenic vistas, rock outcroppings, or scenic highways. The closest designated state scenic highway is State Route (SR) 33, almost 50 miles southwest of Bakersfield.

3.1.2 Impact Analysis

a) Would the project have a substantial adverse effect on a scenic vista?

NO IMPACT. A scenic vista is typically defined as a panoramic view or vista from an identified view/vista point, public road, public trail, public recreational area, or scenic highway. Given the limited viewshed around the project site and its location in downtown Bakersfield, no panoramic views or vistas are within view of the site. Therefore, the project would not affect any scenic vistas.

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

NO IMPACT. Bakersfield in general and the site in particular are almost 50 miles away from the closest scenic highway (Caltrans 2018). Given the limited viewshed around the project site and its location in downtown Bakersfield, no state scenic highways are within view of the site. Therefore, the project would not affect any scenic resources within a state scenic highway.

c) Would the project, in nonurbanized areas, substantially degrade the existing visual character or quality public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

NO IMPACT. The site is in an urbanized area. The project would not change the visual character of the site because the fenced, vacant asphalt lot with some demolition debris would become a fenced, vacant gravel lot following construction. No local vista protection standards, scenic resource protection requirements, or design criteria are applicable to the project. Additionally, the area is not regarded or designated as being visually important or designated “scenic” (Bakersfield 2016). Therefore, the project would not conflict with applicable zoning and other regulations governing scenic quality in urbanized areas.

d) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

NO IMPACT. The project would not include installation of any structure or feature that would create glare or nighttime light. Therefore, the project would not affect day or nighttime views in the area.

3.2 Agriculture and Forestry Resources

Table 3-2. Agriculture and Forestry Resources Checklist

Would the project:	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined in Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

3.2.1 Setting

The site is located in downtown Bakersfield, which is devoid of agricultural or forestry resources, and the site is designated as Urban and Built-Up Land. The closest protected, mapped farmland is about 4 miles to the southwest and is separated from the site by contiguous urban development (CDOC 2020).

3.2.2 Impact Analysis

a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

NO IMPACT. The site is designated as—and surrounded by—Urban and Built-Up Land and is about 4 miles away from the closest mapped California protected farmland (CDOC 2020). Therefore, the project would not convert any mapped California important farmland to non-agricultural use.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

NO IMPACT. The project site is currently zoned for commercial, not agricultural, uses (Bakersfield 2023b) and is not under a Williamson Act contract (CDOC 2024a). Therefore, the project would not conflict with existing zoning for agricultural use or a Williamson Act contract.

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

NO IMPACT. The site is located in downtown Bakersfield, a highly developed urban area that is not zoned for forest land, timberland, or Timberland Production. Therefore, the project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

NO IMPACT. The site is located in downtown Bakersfield, a highly developed urban area devoid of forest land. Therefore, the project would not result in the loss of forest land or conversion of forest land to non-forest use.

e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in the conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

NO IMPACT. This site is designated for urban development (Bakersfield 2023b). The project scope is a standard type of remedial action to mitigate risks of contamination in urban areas like downtown Bakersfield. The project site is limited to PG&E's 0.78-acre parcel and approximately 700 square feet of the adjacent P Street ROW, which are surrounded by extensively developed uses. Therefore, the project would not involve other changes in the existing environment, which, due to their location or nature, could result in conversion of farmland to non-agricultural use or forest land to non-forest use.

3.3 Air Quality

Table 3-3. Air Quality Checklist

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

3.3.1 Setting

The project area is located in downtown Bakersfield within the San Joaquin Valley Air Basin. Air pollutants with national air quality standards, known as "criteria air pollutants," include ozone, carbon monoxide (CO), nitrogen dioxide, sulfur dioxide (SO_2), particulate matter with aerodynamic diameter equal to or less than 10 micrometers (PM_{10}) and 2.5 micrometers ($PM_{2.5}$), and lead. Under the National Ambient Air Quality Standards (NAAQS), the project area is designated as nonattainment for ozone and $PM_{2.5}$, and as maintenance for PM_{10}. The project area is in attainment for CO and nitrogen dioxide, and unclassified for SO_2 and lead. Under the California Ambient Air Quality Standards, the project area is currently designated as nonattainment for ozone, PM_{10}, and $PM_{2.5}$, and as attainment or unclassified for the other pollutants (CARB 2023).

The project is located within the jurisdiction of the San Joaquin Valley Air Pollution Control District (SJVAPCD). SJVAPCD is the regional agency charged with preparing, adopting, and implementing emission control measures and standards for stationary sources of air pollution pursuant to delegated state and federal authority. Construction activities could generate air pollutants that degrade air quality and increase local human exposure to air contaminants. *Guidance for Assessing and Mitigating Air Quality Impacts* (GAMAQI) (SJVAPCD 2015) assists lead agencies and project applicants in evaluating the potential air quality impacts of projects in the San Joaquin Valley Air Basin. The GAMAQI provides recommended air quality emission thresholds for CO, nitrogen oxide, reactive organic gas, SO_2, PM_{10}, and $PM_{2.5}$ for use in evaluating the significance of project emissions, as shown in Table 3-3.1.

Table 3-3.1. SJVAPCD Air Quality Thresholds of Significance – Criteria Pollutants

Project Phase	Emissions (tons per year)					
	CO	Nitrogen Oxide	Reactive Organic Gas	SO_2	PM_{10}	$PM_{2.5}$
Construction Emission Thresholds	100	10	10	27	15	15
Operation Emissions (Permitted Equipment and Activities)	100	10	10	27	15	15
Operation Emissions (Non-permitted Equipment and Activities)	100	10	10	27	15	15

Source: SJVAPCD 2015

SJVAPCD developed the Small Project Analysis Levels (SPALs) to streamline the CEQA process. SJVAPCD SPAL limits for general light industrial projects are 280,000 square feet; fewer than 70 one-way, heavy-heavy duty vehicle trips per day; and fewer than 550 trips made by other types of vehicles per day. Projects with less than or equal to the SPAL size and vehicle trip limits are not expected to cause emissions exceeding the GAMAQI CEQA thresholds. These projects are deemed to have a less-than-significant impact on air quality and, as such, are excluded from requirements to quantify criteria pollutants emissions for CEQA purposes (SJVAPCD 2020).

3.3.2 Impact Analysis

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

LESS-THAN-SIGNIFICANT IMPACT. The project would cause emissions from off-road construction equipment and on-road vehicles used during the construction phase. Earthmoving activities could cause fugitive dust emissions. Project-related construction activities are temporary in nature and would only last for 4 months. The project site is 0.79 acre (34,624 square feet), which is smaller than the SPAL project size limit. Heavy-heavy duty truck trips would average approximately 17 one-way trips per day during construction, and worker commute trips would be approximately 20 trips per day during construction. Operation and maintenance activities of the project would be minimal and would only require periodic site visits with one or two vehicles. The project would have less-than-significant impacts because it meets the SPAL project size and vehicle trip limits.

Construction and operation of the project would comply with applicable federal, state, and local regulations. Because the regional air regulations and rules are developed to ensure the implementation of the regional air quality plans, compliance with these regulations indicates that project activities would not obstruct implementation of the air quality plans of the region.

In summary, project activities would not conflict with any applicable air quality plans because the project size and vehicle trips would be less than the SPAL limits; thus, the construction emissions would not exceed applicable thresholds of significance for criteria pollutants. The project would comply with applicable regulations and rules, and best management practices (BMPs) would be implemented to minimize emissions. Therefore, the project would not conflict with, or obstruct implementation of, applicable air quality plans, and the air quality impacts from the project would be less than significant.

b) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

LESS-THAN-SIGNIFICANT IMPACT. The project area is in nonattainment for ozone and $PM_{2.5}$ under NAAQS, and is in nonattainment for ozone, PM_{10}, and $PM_{2.5}$ under California Ambient Air Quality Standards. Constructing the project would temporarily increase ambient air pollutant concentrations through tailpipe emissions from construction equipment and vehicles, and fugitive dust emissions from earthmoving activities and vehicle travel. These emissions would only occur during construction and would stop once construction is completed. Construction emissions would be further reduced with implementation of BMPs identified in the *Remedial Action Plan* (Jacobs 2023a). Construction emission control measures would include, but not be limited to, the following:

- Applying a water mist to dust-generating sources, as necessary, to minimize fugitive dust emissions.
- Periodically sweeping work areas and haul routes to prevent dust generation during soil hauling activities.
- Using plastic sheets to cover stockpiled soil; plastic sheets may be used to cover other exposed areas, if necessary.
- If dust levels cannot be controlled to below action levels by implementing these measures, stop work until additional controls are implemented to reduce dust generation from the work area.
- Reducing heavy equipment (diesel) idling time to no more than 10 minutes of inactivity.
- Reducing truck idling time to a maximum of 5 minutes while onsite waiting to load or unload.
- Using properly sized equipment because engines that are too large for an application burn more fuel because of unnecessary weight. In addition, drivers may be prone to using the excess horsepower needlessly, causing additional fuel consumption. An undersized engine easily

becomes overworked leading to excess fuel consumption and accelerated engine wear. Equipment selection would be based on the anticipated project requirements.

- Improving equipment maintenance because improper wheel alignment and improperly inflated tires on trucks can reduce fuel efficiency by 3 to 4 percent. Haul trucks would be maintained in accordance with the manufacturer's recommendations. Truck drivers would be instructed to check their tire inflation in accordance with the tire manufacturer's recommendations.
- Improving operator training to reduce fuel consumption. For example, an excavator operator who needlessly shifts hydraulic levers to lift additional weight when the equipment is already operating at its maximum capacity can save 225 gallons of fuel a year by eliminating this practice 1 hour per day. During the tailgate safety meetings, equipment operators would be trained on ways to minimize excessive fuel consumption.

Post-construction (operational) emissions would be negligible. Because the project size and vehicle trips are lower than the SPAL limits, the project is excluded from requirements to quantify criteria pollutants emissions. Therefore, it can be concluded that the project would not result in a cumulatively considerable net increase of any criteria air pollutants, and potential impacts would be less than significant.

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

LESS-THAN-SIGNIFICANT IMPACT. Sensitive receptors in an air quality analysis are people who have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptor locations include schools, parks and playgrounds, day care centers, nursing homes, hospitals, and residential dwelling units (SJVAPCD 2015). The project is located in a mixed industrial and commercial area with a few residential clusters. The following sensitive receptor locations are closest to the project site:

- A new apartment building currently under construction (ready for occupancy prior to project construction), immediately to the west
- Two outdoor playgrounds 180 feet to the west and 575 feet to the northwest
- Several residential units, approximately 300 feet to the north
- Central Park, approximately 425 feet to the east
- Downtown Elementary School, approximately 1,090 feet to the west

Although the closest currently occupied residential units are approximately 300 feet north of the project site on P Street, construction activities would be temporary and limited to the area where construction equipment would operate. Construction emissions from the project are assumed to be below the limits for criteria air pollutants and their precursors because the project size and daily vehicle trips would be below SJVAPCD SPAL limits. In addition, during construction, the BMPs listed under Section 3.3.2(b) would be implemented. These measures would minimize exposure of nearby sensitive and residential receptors to construction-related pollutants. Therefore, during project construction, residences and other sensitive receptor locations could have limited short-term exposure to emissions from the construction activities. Once the construction is complete, the project air emissions would stop in the project area. As such, the project would not result in long-term exposure of sensitive receptors to air pollutants, and potential impacts would be less than significant.

d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

LESS-THAN-SIGNIFICANT IMPACT. Diesel construction equipment may generate minor odorous emissions during construction activity. In addition, the contaminated soil may cause odors during excavation and haul-out. However, odorous emissions would be monitored, and mitigation measures would be implemented during the excavation and soil haul-out operation. Odor mitigation measures identified in the *Remedial Action Plan* (Jacobs 2023a) that could be used at the site include the following:

- Applying a water mist, possibly with environmentally safe additives

- Applying environmentally safe chemical suppressants or vapor-suppressing foam
- Covering exposed areas with plastic sheeting

Odorous emissions during project construction would be localized to the immediate area and would be short in duration. With the monitoring and mitigation measures, the project would not create objectionable odors affecting a substantial number of people during construction. The project is not expected to cause odorous emissions post-construction. Therefore, the project would not result in odorous emissions that would adversely affect a substantial number of people, and potential impacts would be less than significant.

3.4 Biological Resources

Table 3-4. Biological Resources Checklist

Would the project:	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				X
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				X
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?		X		
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X

3.4.1 Setting

The project site is located in downtown Bakersfield in a highly developed and urban area. The current land use around the project site includes industrial and commercial activity, residential developments, and community open spaces, such as parks. Vacant parcels with some disturbed ruderal vegetation are scattered throughout the area. Various ornamental street trees, including Mediterranean cypress (*Cupressus sempervirens*), crape myrtle (*Lagerstroemia indica*), locust (*Robinia* sp.), London plant tree (*Platanus* x *hispanica*), and Mexican fan palm (*Washingtonia robusta*) are present outside the southern and eastern boundaries of the project site. A desktop review of aerial imagery and historical maps indicates that this area has been developed and subject to disturbance since the 1880s (Sanborn Map Company 1890; CDFW 2024a).

A channelized riverine feature, the Kern Island Canal, is located approximately 0.2 mile (800 feet) east of the project site, passing through Mill Creek Linear Park. Within the park, the canal has been widened to resemble a large pond. The Kern River is approximately 1.5 miles northwest of the project site. Elevation at the project site is approximately 405 feet above mean sea level. Because of the highly developed nature and extensive disturbance in the area, the Biological Study Area (BSA) for the project consists of the project site and a small 50-foot buffer.

A desktop review was conducted to assess the presence of biological resources within the BSA. The methods and results of the desktop review are presented in the Biological Resources Technical Memorandum provided in Appendix A. This section details the results of the Biological Resources Technical Memorandum and provides additional information used to evaluate potential effects on biological resources based on the significance criteria set forth in Appendix G of the CEQA Guidelines. The conclusions are summarized in Table 3-4, Biological Resources Checklist, and are discussed in more detail in Section 3.4.3, Impact Analysis. All figures referenced are provided in the Biological Resources Technical Memorandum (Appendix A).

3.4.1.1 Vegetation Communities

The project site and the larger BSA are developed and predominantly paved (Appendix A, Figure 2, Biological Study Area). No native vegetation communities are present; however, various ornamental street trees are present in the BSA, outside the project site's southern and eastern boundaries.

3.4.1.2 Special-status Plants and Wildlife

Results of the desktop analysis indicate that 35 special-status species (15 plant species and 20 wildlife species) have been previously documented within 5 miles of the BSA (Appendix A, Attachments 1 and 2) (CDFW 2024b; CNPS 2024; USFWS 2024a). The BSA does not support any vegetation communities, suitable soils, or aquatic resources that could provide suitable habitat for these special-status species. Therefore, none of the 35 special-status species are expected to occur within the BSA. No designated critical habitat or essential fish habitat was identified within the 5-mile search area (NOAA 2024; USFWS 2024a).

3.4.1.3 Wetlands and Other Waters

Based on a desktop review of current and historical aerial imagery, the U.S. Fish and Wildlife Service's (USFWS) National Wetlands Inventory, and the California Aquatic Resources Inventory, no wetlands or other aquatic resources were identified within the BSA (SFEI 2022; USFWS 2024b). Kern Island Canal, a channelized riverine feature, is the nearest aquatic resource identified from desktop analysis and is located approximately 0.2 mile east of the BSA.

3.4.1.4 Wildlife Movement Corridors and Nursery Sites

Bakersfield falls along the southern edge of a large linkage area that connects core natural areas to the southwest and the east (CDFW 2024a). The Kern River, located 1.5 miles northwest of the BSA, has been mapped as a riparian corridor, and the associated alluvial fan area is a known wildlife habitat linkage for San Joaquin kit fox (*Vulpes macrotis mutica*) and Tipton kangaroo rat (*Dipodomys nitratoides nitratoides*). However, no known wildlife movement corridors or nursery sites overlap the BSA. No known bat roosting or maternity colonies, or hibernacula are located in or near the BSA.

Ornamental trees along the perimeter of the project site may provide suitable nesting habitat for birds protected under the Migratory Bird Treaty Act and California Fish and Game Code 3503, including house finches (*Haemorhous mexicanus*), mourning doves (*Zenaida macroura*), and other common passerine species. Structures, such as buildings and ventilation units on the adjacent property along the northern edge of the BSA, may also provide suitable nesting habitat. All existing structures within the project site will have been removed prior to the start of construction. However, birds may nest in equipment or materials stored onsite and ground-nesting species, such as killdeer (*Charadrius vociferus*), may nest within the project footprint. No raptors would be expected to nest in the street trees within the BSA because the area is highly developed, with high levels of disturbance (including movement and noise from vehicles and pedestrians), and no foraging habitat is present nearby.

3.4.2 Local Policies and Ordinances

3.4.2.1 Kern County General Plan

The project site is located within the *Kern County General Plan* planning area. The Land Use, Open Space, and Conservation Element (Chapter 1) includes several policies, goals, and implementation measures relevant to biological resources. This element provides for a variety of land uses for future economic growth while also assuring the conservation of Kern County's agricultural, natural, and resource attributes. Section 1.10, General Provisions, of the *Kern County General Plan* provides goals, policies, and implementation measures that apply to all types of discretionary projects, including remediation projects (Kern County 2009).

The overall goal of the *Kern County General Plan* is to ensure that Kern County can accommodate anticipated future growth and development while maintaining a safe and healthful environment and a prosperous economy by preserving valuable natural resources, guiding development away from hazardous areas, and assuring the provision of adequate public services. Section 1.10.5, Threatened and Endangered Species, of the plan requires that the proponents of discretionary projects consider effects on biological resources as required by CEQA.

Kern County's commitment to oak tree conservation is presented in Section 1.10.10, Oak Tree Conservation, of the plan. The associated policies and implementation measures include preserving in place oak trees with a 12-inch-diameter trunk or greater and retaining a 30 percent canopy coverage for development projects in oak woodlands. No oak trees are present in the BSA.

3.4.2.2 City of Bakersfield

Metropolitan Bakersfield General Plan

The project site is located in downtown Bakersfield and is subject to the *Metropolitan Bakersfield General Plan*. The Conservation Element (Chapter V) presents goals, polices, and implementation measures relevant to biological resources. This element acknowledges the loss of habitat for sensitive plant and wildlife species resulting from expanding urban uses and the impact of agricultural and oil extraction practices (Bakersfield 2016). The overall goal is to conserve and enhance the Bakersfield's biological resources while facilitating orderly development. Therefore, the proponents of discretionary projects must consider effects on biological resources as required by CEQA.

Bakersfield Municipal Code

Bakersfield Municipal Code Chapter 12.40, Street Trees, outlines the maintenance, protection, and specifications of trees located in public spaces and ROWs. This tree ordinance prohibits injury or destruction of such public trees. Cement or other substances may not be placed or maintained in such a way that impedes access of water or air to the roots and any tree, shrub, or plant in public spaces and ROWs without Bakersfield approval. If a tree, shrub, or plant constitutes a hazard or impediment to the public, the property owner or tenant is responsible for removal or trimming. A local permit must be obtained for commercial tree contractors prior to maintenance on trees located in public spaces and ROWs.

Trees are to be preserved and protected in accordance with *Bakersfield Municipal Code* § 17.61.050, Tree Preservation and Protection. Trees voluntarily removed from an existing project (except when necessary for the protection of public safety, property damage, or liability, or damage or loss by acts of nature, the willful unlawful acts of persons other than the property owner, or by complying with other federal or state laws or actions) must be replaced at the average size of what is or was existing, not to exceed a 48-inch box container size. Replacement trees must be installed within 120 days of removal. No trees would be trimmed or removed as part of the project.

3.4.2.3 Habitat Conservation Plans

The *Metropolitan Bakersfield Habitat Conservation Plan* (MBHCP) was established with the goal of acquiring, preserving, and enhancing native habitats that support threatened and endangered species while allowing urban development to proceed as set forth in the *Metropolitan Bakersfield General Plan* (Bakersfield 1994). The 20-year Endangered Species Act § 10(a)(1)(B) permit issued by USFWS authorized take of 9 federally listed species. The California Department of Fish and Wildlife Incidental

Take Permit authorized take of four state-listed species. Both the Bakersfield Municipal Code (§ 15.78.030) and the *Kern County Code of Ordinances* (§ 16.62.030) mandate payment of a habitat mitigation fee prior to issuance of any urban development permit within the MBHCP area. The project site falls within the boundaries of the MBHCP. However, the issued take permits have expired, and neither the MBHCP nor the habitat mitigation fee are in effect. Furthermore, the habitat mitigation fee would not be applicable to remediation projects. The project would not affect any of the species covered under the MBHCP.

A new Bakersfield habitat conservation plan has been proposed as a joint effort by Bakersfield and Kern County. This habitat conservation plan is not yet developed, and no permit coverage is currently available. Individual projects requiring take authorization would therefore need to consult with USFWS and California Department of Fish and Wildlife. Because this project would not affect special-status species or their habitats (Section 3.4.3), no agency consultations are needed.

3.4.3 Impact Analysis

The significance criteria used for determining standards of significance for biological resources was derived from Appendix G of the CEQA Guidelines. Potential impacts on vegetation and wildlife are discussed in Sections 3.4.3(a) through 3.4.3(f).

a) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

NO IMPACT. Construction of the project would not disturb special-status species or their habitats. The project site is already disturbed and predominantly paved, and no suitable habitat for special-status species is present within the BSA. Therefore, the project would not have a substantial adverse effect on special-status species.

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

NO IMPACT. The project site is disturbed and predominantly paved; no sensitive natural communities are present. Therefore, the project would not disturb any riparian habitat or other sensitive natural community.

c) Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

NO IMPACT. No federal or state protected wetlands are in or near the project site. Therefore, the project would not have a substantial adverse effect on wetlands.

d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

LESS-THAN-SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED. No native wildlife nursery sites or established wildlife corridors were identified within the BSA. Given the small size of the project site and the existing level of disturbance within the project site, project activities are not anticipated to affect the movement of any species through the area. However, migratory birds protected by the Migratory Bird Treaty Act and California Fish and Game Code 3503 may move through the BSA and nest in the vicinity. Construction activities may temporarily degrade potential nesting habitat in the street trees or structures adjacent to the project site. Although any potential effect is expected to be minimal based on the existing level of disturbance of the project site (so any nesting birds would be accustomed to a high level of disturbance) and the small number of trees in the BSA that provide potentially suitable habitat for nesting, nesting birds within the boundaries of the project site could potentially be affected by project activities. Mitigation Measure (MM) BIO-1 listed in Section 3.4.4, which requires preconstruction nesting bird surveys, would be implemented to further minimize potential impacts on nesting birds within the project site. Therefore, the project would have a less-than-significant impact on migratory movements, wildlife corridors, and wildlife nurseries with implementation of MM BIO-1.

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

NO IMPACT. Other than those listed in Section 3.4.2, no other local policies or ordinances intended to protect biological resources would apply to project construction or operation. The Biological Resources Technical Memorandum in Appendix A documents the analysis of potential effects on biological resources and meets pertinent *Kern County General Plan* and *Metropolitan Bakersfield General Plan* requirements. In addition, no oak trees are present in the BSA, nor would any of the existing trees be trimmed or removed during construction. Therefore, the project would not conflict with any local policies or ordinances intended to protect biological resources

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

NO IMPACT. The project is located within the boundaries of the MBHCP. However, the MBHCP take permits have expired, and the MBHCP is no longer in effect. No other habitat conservation plans or natural community conservation plans overlap the project footprint; therefore, the project would not conflict with the provisions of a conservation plan.

3.4.4 Mitigation Measures

To minimize the impacts on biological resources identified in Section 3.4.3, PG&E would implement the following MM:

1) **MM BIO-1.** If construction will occur during the nesting season (generally February 1 through August 31), a qualified biologist with nesting bird experience (as approved by the PG&E Biologist) will conduct a preconstruction nesting bird survey within 7 days of any ground disturbance or construction activity. Surveys should be conducted within the project boundary. Any clearing and removal of surface materials or vegetation must be completed within 1 week of the survey, or a follow-up survey must be conducted to make sure the remaining areas to be cleared are free of nesting birds. If active nests are identified, they will be monitored by the qualified biologists for signs of disturbance from project activities. If behavior indicating disturbance is observed, a disturbance-free buffer will be established around the nest as developed by the qualified biologist based on species and work activities. The buffer will not be removed until the young have left the nest, or the nest is otherwise determined to be inactive by the qualified biologist. If personnel observe a nest on the ground or in materials/equipment, activities will cease, and the PG&E Biologist will be notified immediately.

3.5 Cultural Resources

Table 3-5. Cultural Resources Checklist

Would the project:	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

3.5.1 Setting

The study area for cultural resources, or area of potential impacts (API), encompasses all areas that may be affected by project-related ground disturbance. For this project, the API is limited to the 0.79-acre project site, which comprises Kern County Assessor Parcel Number 005-252-04 at 800-820 20th Street in downtown Bakersfield and approximately 700 square feet of the adjacent P Street ROW. The area is developed with light industrial, commercial, recreational, and residential uses, and vegetation is limited to landscaped and ornamental trees along 20th and Q Streets. One built resource was located within the API and consisted of two buildings and one structure. This built resource was demolished in June 2024 per the Bakersfield building permit for demolition of the buildings issued on August 18, 2023, and extended on April 15, 2024. The entire parcel is fenced with chain-link and plastic boards. No existing cultural resources are present within the API.

The API is located at the site of a former MGP that operated from 1888 to 1910. Historical aerials and U.S. Geological Survey (USGS) topographic maps indicate no surface evidence of built environment resources related to the MGP. The former MGP was on stand-by from 1910 into the mid-1940s, when the MGP structures were dismantled and removed, and the property was redeveloped. The property was subsequently used for automotive-related services until 2019. PG&E owned the property from the mid-1940s into the mid-1970s, and then repurchased it in 2019 for remediation and site closure, with the goal of selling the property for future redevelopment.

Nearly a century of industrial and commercial uses, grading, and remodeling have caused considerable disturbance to the API. The buildings located at 800-820 20th Street are recommended not eligible for listing on the California Register of Historical Resources (CRHR) due to a lack of significance and therefore are not historical resources for the purposes CEQA. Given the absence of known indigenous archaeological sites in the area, distance from natural freshwater sources, and extent and severity of past disturbance from urban development, the potential for the discovery of intact archaeological deposits from the precontact period is estimated to be low. However, historical land uses suggest a high potential for the discovery of subsurface industrial remains related to the MGP during project construction, including structural foundation elements, the remains of oil tanks, and industrial waste concentrations.

3.5.2 Impact Analysis

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

LESS-THAN-SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED. No historical resources for the purposes of CEQA pursuant to § 15064.5(a)(2)-(3) of the CEQA guidelines are known to be present within the API (Parcel Number 005-252-04 and approximately 700 square feet of the adjacent P Street ROW). However, it is possible that previously unrecorded historical resources may be found. MM CUL-1 through MM CUL-3, listed in Section 3.5.3, which require a designated archaeologist, archaeologist-led cultural resources training, and inadvertent discovery protocols, would be implemented to further minimize potential impacts on cultural resources. Therefore, the project would not affect the significance of historical resources pursuant to §15064.5 and the potential impacts would be less than significant with implementation of MM CUL-1 through MM CUL-3.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

LESS-THAN-SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED. Pursuant to §§ 15064.5(a)(2), (a)(3), (c)(3), and (c)(4) of the CEQA guidelines, no archaeological resources or unique archaeological resources are known to be present within the API (Parcel Number 005-252-04 and approximately 700 square feet of the adjacent P Street ROW). However, the inadvertent discovery of previously unrecorded archaeological resources during project work is possible. MM CUL-1 through MM CUL-3, listed in Section 3.5.3, which require a designated archaeologist, archaeologist-led cultural resources training, and inadvertent discovery protocols, would be implemented to further minimize potential impacts on cultural resources. Therefore, the project would not affect the significance of archaeological resources pursuant to §15064.5 and the potential impacts would be less than significant with implementation of MM CUL-1 through MM CUL-3.

c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

LESS-THAN-SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED. Existing conditions and past onsite uses do not indicate that human remains are present within the API (Parcel Number 005-252-04 and approximately 700 square feet of the adjacent P Street ROW). However, the inadvertent discovery of human remains during project work is possible. MM CUL-4 listed in Section 3.5.3, which requires protocols for the inadvertent discovery of human remains, would be implemented to further minimize potential impacts on cultural resources. Therefore, the project would not disturb human remains, including those interred outside of dedicated cemeteries, and the potential impacts would be less than significant with implementation of MM CUL-4.

3.5.3 Mitigation Measures

To minimize the potential impacts on cultural resources identified in Section 3.5.2, PG&E would implement the following MMs, with DTSC as the lead agency providing oversight:

1) **MM CUL-1.** A qualified archaeologist will be designated and retained prior to construction to respond to inadvertent discoveries made during ground-disturbing activities. The designated archaeologist may be the PG&E Cultural Resource Specialist (CRS) or a contractor. In either case, the archaeologist will meet the Secretary of the Interior's professional standards for archaeology and will implement MM CUL-2 through MM CUL-4 as necessary. This will include delivery of a cultural resource awareness training as outlined in MM CUL-2 and response to any inadvertent discoveries made during project work as detailed in MM CUL-3 and MM CUL-4. The designated archaeologist will work in close coordination with the PG&E CRS, assuming the same individual does not serve in both roles.

2) **MM CUL-2.** An archaeologist-led cultural resources awareness and response training will be provided prior to the start of ground-disturbing activities. The training will review the types of cultural resources likely to be found in the API, areas of high sensitivity, and guidelines for distinguishing potentially significant resources from those that do not meet significance criteria. However, discoveries will be assessed on a case-by-case basis by cultural resource professionals, whether a contractor, DTSC, or the PG&E CRS.

   The archaeological resources most likely to meet CRHR eligibility criteria are those that expand our understanding of the themes of significance identified by PG&E in their *Historic-Era Electrical Infrastructure Management Plan*. Most relevant is the theme of Manufactured Gas Plant Design and Development, an aspect of the broader topic of Technological Innovation. Its period of significance spans from 1852 to 1929. MGP infrastructure can express facets of this theme if it demonstrates advanced technological applications during this period of significance. To address related research questions, an archaeological resource must be able to yield novel information on PG&E's technological innovation in construction and design that is not already captured in the existing historical record.

3) **MM CUL-3.** If an archaeological resource is encountered during construction, all work within a 25-foot radius of the find will be stopped and the location secured. The designated archaeologist will be notified immediately so that an assessment of the find can be undertaken. If the PG&E CRS is not in the role of designated archaeologist, they will also be notified immediately. If the resource cannot be avoided, the designated archaeologist will make a recommendation regarding eligibility for the CRHR, data recovery, curation, or other appropriate mitigation in coordination with the PG&E CRS. DTSC will be consulted, and mitigation will only move forward with their concurrence. Ground disturbance within the 25-foot radius can resume once these steps are taken.

4) **MM CUL-4.** If human remains are encountered (or suspected) during onsite construction activities, § 7050.5 of the California Health and Safety Code states that work crews must stop all work within 100 feet of the find. The work crew will secure the locations and treat the find as confidential and not disclose the location to the public. The PG&E CRS will be contacted as soon as any suspected human remains are identified. The PG&E CRS would promptly notify the county coroner and Bakersfield if the remains appear human. Human burial treatment procedures are outlined in § 7050.5 of the California Health and Safety Code and Public Resources Code § 5097.98. Authorization from a PG&E CRS is required prior to resuming work in the discovery location.

3.6 Energy

Table 3-6. Energy Checklist

Would the project:	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

3.6.1 Setting

Energy consumption is analyzed because of the environmental impacts associated with energy production and usage. Such impacts include depleting nonrenewable resources (such as oil, natural gas, and coal) and emitting pollutants during site excavation and restoration activities. The *Metropolitan Bakersfield General Plan* (Bakersfield 2016) and *Kern County General Plan* (Kern County 2009) do not contain objectives and policies regarding energy efficiency and the use of renewable energy technologies for construction activities. Bakersfield's draft *Climate Action Plan* (Bakersfield 2023a) includes "Measure IN-3.1: Increase use of electricity and alternative fuels in construction equipment" to promote the use of low- and zero-emission construction equipment rather than vehicles. Additionally, the plan includes "Action BE-3.1.2: Encourages the use of electric-powered construction equipment in all discretionary projects."

3.6.2 Impact Analysis

a) Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation?

LESS-THAN-SIGNIFICANT IMPACT. Excavation activities at the site would require use of nonrenewable energy resources, primarily fossil fuels (oil, gasoline, and diesel) for construction equipment. These nonrenewable energy resources would likely be used efficiently during construction activities. Construction activities are anticipated to take approximately 4 months, including site excavation and restoration. These activities would not create a wasteful, inefficient, or unnecessary consumption of fuel supplies. Once site construction activities are completed, a negligible amount of energy would be used as fuel for maintenance vehicles and equipment but would not cause a significant increase in energy consumption. Therefore, potential impacts would be less than significant.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

NO IMPACT. The *Metropolitan Bakersfield General Plan* (Bakersfield 2016) and *Kern County General Plan* (Kern County 2009) do not contain objectives and policies regarding the use of renewable energy technologies or energy efficiency during temporary construction activities. Bakersfield's draft *Climate Action Plan* (Bakersfield 2023a) includes "Measure IN-3.1: Increase use of electricity and alternative fuels in construction equipment" to promote the use of low- and zero-emission construction equipment rather than vehicles. Additionally, the plan includes "Action BE-3.1.2: Encourages the use of electric-powered construction equipment in all discretionary projects." The draft *Climate Action Plan* (Bakersfield 2023a) is pending city council approval, and the use of low- and zero-emission construction equipment is not currently a requirement. Construction is anticipated to be complete prior to adoption of the plan.

Construction workers would also be sourced locally or would be traveling from locally provided temporary residences, which would further minimize energy used associated with transportation.

Once construction is complete, the site would remain vacant. Potential future development of the site would be a separate action and would require subsequent assessment of potential impacts on energy. Construction activities associated with this project are short term and temporary and would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

3.7 Geology and Soils

Table 3-7. Geology and Soils Checklist

Would the project:	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☐	☒
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☐	☒
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

3.7.1 Setting

The project site is underlain entirely by Late Holocene-aged (2,000 to 150 years ago) alluvial fan “Q” deposits, generally derived from nonmarine sedimentary rocks (CDOC 2022b).[3] Soils data for the project site indicate one soil type is present: Kimberlina-Urban land-Cajon complex, 0 to 2 percent slopes (NRCS 2023). The Kimberlina series consists of very deep, well-drained, sandy loam soils on floodplains and recent alluvial fans. These geologic materials are often highly disturbed by urban and residential construction and generally lack true profile development because they consist of a mix of introduced fill materials and remnant native soils. Soils in and around the site have been heavily disturbed by consecutive phases of historical urban development, excavation, demolition, and redevelopment from the 1880s until the 2020s.

[3] Alluvial fan “Q” deposits derive from both nonmarine and marine sedimentary rocks (CDOC 2022b). However, the lithology is clarified with marine deposits near the coast. Therefore, it is assumed downtown Bakersfield would have negligible, if any, marine deposits.

Downtown Bakersfield is not within an earthquake fault zone; the closest seismic features to the project site are a complex of unnamed faults east of Oildale about 4.5 miles to the east (CDOC 2016a, 2024b). The project site is not in a liquefaction zone and is not at risk for earthquake-induced landslides (CDOC 2022a).

3.7.2 Impact Analysis

a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

NO IMPACT. Ground rupture is ground deformation that occurs along the surface trace (line on the surface of the earth) of a fault during an earthquake. The closest Alquist-Priolo Earthquake Fault Zone is about 8 miles northeast of the project site (CDOC 2024b). Excavation would be limited to the 0.79-acre project site and the project does not involve development of new structures that could increase the risk over baseline conditions. Therefore, the project would not expose people or structures to potential substantial adverse effects involving rupture of a known earthquake fault.

ii. Strong seismic ground shaking?

NO IMPACT. Bakersfield is in a historically active seismic region. However, the site is in an area with relatively low potential for seismic ground shaking (CDOC 2016a). Currently, the site is a vacant asphalt lot with some debris. Post-construction, the site would be a dirt lot covered with compacted gravel and would not have any structures or utilities. Future structures, if proposed on the former MGP property, would be required by state law and city ordinance to be constructed in accordance with the Uniform Building Code (specifically Seismic Zone 4, which has the most stringent seismic construction requirements in the United States), and to adhere to all modern earthquake construction standards. Therefore, the project would not expose people or structures to potential substantial adverse effects from strong seismic ground shaking.

iii. Seismic-related ground failure, including liquefaction?

NO IMPACT. The most common seismic-related ground failures are liquefaction and lateral spreading. In both cases, during periods of ground motion caused by an event such as an earthquake, loose materials transform from a solid state to near-liquid state because of increased pore water pressure. Such ground failure generally requires a high water table and poorly draining soils for such ground failure to occur. The Kimberlina-Urban land-Cajon complex, 0 to 2 percent slopes, are well-drained, aridic soils with low moisture content and, generally, a water table at least 80 inches deep (NRCS 2023). Specifically at the site, depth to groundwater has been previously estimated at approximately 67 feet bgs (AEC 2017).

Because groundwater levels are not close enough to the ground surface to result in sufficiently saturated soils suitable for liquefaction, the potential for liquefaction at the project site is low, and the area is not in a liquefaction zone (CDOC 2022a). In addition, future structures, if proposed on the former MGP property, would be required by state law and city ordinance to be constructed in accordance with Uniform Building Code requirements, including those relating to soil characteristics. Therefore, the project would not expose people or structures to potential substantial adverse effects involving seismic-related ground failure, including liquefaction.

iv. Landslides?

NO IMPACT. In Kern County, the common types of landslides induced by earthquake occur on steeper slopes found in the foothills and along the Kern River Canyon. In these areas, landslides are generally associated with bluff and stream bank failure, rockslides, and slope slip on steep slopes. The project site has slopes up to 2 percent slope, which are considered flat and not steep, nor is the site at risk for earthquake-induced landslides (CDOC 2022a). Therefore, the project would not expose people or structures to potential substantial adverse effects involving landslides.

b) Would the project result in substantial soil erosion or the loss of topsoil?

LESS-THAN-SIGNIFICANT IMPACT. The project involves excavation of soil, including topsoil, which could erode if exposed to precipitation. To minimize erosion, the dirt surface of the entire site would be covered with about 6 inches of compacted gravel. Additionally, during construction, BMPs would be implemented to minimize fugitive dust during dry periods and inadvertent soil transport in stormwater runoff when it rains (refer to Section 3.10, Hydrology and Water Quality). Therefore, the project would not result in substantial soil erosion or the loss of topsoil, and soil impacts would be less than significant.

c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

NO IMPACT. As discussed in Section 3.7.2(a), the project site's soils would not expose people or structures to potential substantial adverse effects involving seismic-related ground failure, including liquefaction, lateral spreading, or landslides.

In the San Joaquin Valley, subsidence associated with historical groundwater pumping is widespread (KRGSA 2022). However, downtown Bakersfield seems to be less susceptible to such subsidence. Around the project site, subsidence is estimated to be from 0 to 5 feet, the smallest range of subsidence identified by the California Department of Water Resources (California DWR 2005). However, USGS does not include downtown Bakersfield as an area with either historical or current recorded subsidence (USGS 2013, 2018). The project would not contribute to regional subsidence because construction water would come from Bakersfield's municipal water supply, and municipal water use must be consistent with the requirements of the *2020 Urban Water Management Plan* (Bakersfield 2021a) and the Kern River Groundwater Sustainability Agency's management plan (KRGSA 2022).

Collapsible soils consist of loose, dry, low-density materials that collapse and compact under the addition of water or excessive loading. The project would not involve construction of any structures or utilities. Future structures, if proposed on the former MGP property, would be required by state law and city ordinance to be constructed in accordance with the Uniform Building Code requirements, including those relating to soil characteristics. Therefore, the project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse.

d) Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

NO IMPACT. When a soil has 35 percent or more clay content, it is considered a clayey soil. Soils containing clay are characterized as having expansive characteristics, and expansive soils are known to have a high shrink-swell potential. The clay content of the Kimberlina soil series, which covers about one-third of the project site, ranges from 5 to 20 percent. The rest of the soils (Urban, Cajon) do not have any clay content (NRCS 2023).

The project would not involve construction of any structures or utilities. Additionally, future structures, if proposed on the former MGP property, would be required by state law and city ordinance to be constructed in accordance with the Uniform Building Code requirements, including those relating to soil characteristics. Therefore, the minor potential for expansive soils at the project site would not create substantial risks to life or property.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

NO IMPACT. No septic tanks or alternative wastewater disposal systems are proposed for this project, and future needs on the project site would be serviced by Bakersfield's municipal separate stormwater system (MS4) and municipal sanitary sewer system. Therefore, the project would not result in impacts related to soils incapable of adequately supporting septic tanks or alternative wastewater disposal systems.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

NO IMPACT. Paleontological sensitivity is determined by the potential for a geologic unit to produce scientifically significant fossils. The closest known unique paleontological resources are located within the Sharktooth Hill bonebed about 7 miles northeast of the project site. Soils in and around the site have been heavily disturbed by consecutive phases of historical urban development, excavation, demolition, and redevelopment from the 1880s until the 2020s. Portions of the project site have been excavated during construction and expansion of the former MGP. Based on the distance from known unique paleontological resources and the extent of previous subsurface disturbance onsite, the project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

3.8 Greenhouse Gas Emissions

Table 3-8. Greenhouse Gas Emissions Checklist

Would the project:	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

3.8.1 Setting

Greenhouse gases (GHGs) include both naturally occurring and anthropogenic gases that trap heat in the earth's atmosphere. GHGs known to contribute significantly to climate change include carbon dioxide (CO_2), methane, nitrous oxide, hydro-chlorofluorocarbons, perfluorocarbons, and sulfur hexafluoride.

In California, transportation sources compose the largest category of GHG-emitting sources (CARB 2019). In 2021, statewide emissions from all emitting activities were 381.3 million metric tons (MMT) CO_2 equivalent (CO_2e), 12.6 MMT CO_2e higher than 2020 levels and 49.7 MMT CO_2e below the 2020 GHG limit of 431 MMT CO_2e (CARB 2024).

SJVAPCD adopted the *Guidance for Valley Land-Use Agencies in Addressing GHG Emission Impacts for New Projects under CEQA* in 2009 (SJVAPCD 2009). According to the guidance, projects complying with an approved GHG emission reduction plan or GHG mitigation program would be determined to have a less-than-significant individual and cumulative impact with respect to GHG emissions and climate change. For other projects, the guidance relies on the use of best performance standards to assess the significance of project-specific GHG emissions on global climate change. Otherwise, a project needs to demonstrate a 29 percent reduction in GHG emissions from business-as-usual conditions to conclude that a project would have a less-than-significant impact. The determination is based on the principle that projects that have reduced or mitigated emissions consistent with Assembly Bill (AB) 32, the Global Warming Solutions Act of 2006, should be considered to have a less-than-significant impact. Although SJVAPCD's guidance recommends approaches for evaluating the significance of GHG impacts, the guidance does not limit a lead agency's authority to establish its own process and guidance for determining significance (SJVAPCD 2009). The GHG impact analysis criteria in SJVAPCD's CEQA guidance are not applicable to the proposed project type; thus, the project impacts on GHG were evaluated using the California Air Pollution Control Officers Association's (CAPCOA's) recommended GHG screening level, as further discussed in Section 3.8.2.

3.8.2 Impact Analysis

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

LESS-THAN-SIGNIFICANT IMPACT. Currently, the SJVAPCD CEQA guidelines do not include applicable quantitative thresholds for GHG emissions, nor has SJVAPCD developed a local GHG reduction plan applicable to the project area. SJVAPCD's adopted best performance standards are specifically directed at reducing GHG emissions from stationary sources. However, the adopted best performance standards generally would not be applicable to the project because no stationary sources of GHG emissions would be onsite during project construction or operation. Therefore, the impacts of GHG were evaluated based on whether GHG emissions from project construction would hinder or conflict with state or local GHG reduction strategies and/or emission reduction goals.

CAPCOA recommended an interim 900-metric-ton (MT) CO_2e screening level as a theoretical approach to identifying projects that require further analysis and potential mitigation (CAPCOA 2008). Following CAPCOA's analysis of development applications in various cities, it was determined that the threshold of 900 MT CO_2e per year would ensure that new development projects would keep California on track to meet its AB 32 goals. For this analysis, CAPCOA's GHG screening level is used to evaluate the GHG impacts.

The construction of the project would be temporary, occurring over approximately 4 months. GHG emissions from construction equipment and vehicle tailpipe emissions were estimated using the California Emissions Estimator Model (CalEEMod) (CAPCOA 2022) and would be approximately 142 MT CO_2e during project construction (Appendix B provides details of CalEEMod modeling data). The GHG emissions from the project construction would be minimal and lower than the CAPCOA GHG emission screening level of 900 MT CO_2e. The GHG emissions during project construction would not contribute substantially to the regional GHG emission inventory or contribute to global climate change. The project would implement BMPs during construction, such as minimizing unnecessary construction vehicle trips and idling time, which would further reduce GHG emissions. Therefore, the project would not generate GHG emissions, either directly or indirectly, that would have a significant impact on the environment, and the potential impacts would be less than significant.

b) Would the project conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

LESS-THAN-SIGNIFICANT IMPACT. Executive Order S-3-05 and AB 32 set the goals of reducing GHG emissions to 2000 levels by 2010, to 1990 levels by 2020, and 80 percent below 1990 levels by 2050. To meet these GHG reduction goals, the California Air Resources Board prepared a scoping plan pursuant to AB 32 and updated the plan in 2022 to provide guidelines on statewide GHG reduction strategies. The 2022 scoping plan (CARB 2022) is the primary plan for reducing GHG emissions throughout California. This plan is designed to reduce statewide GHG emissions in California by 40 percent below 1990 levels by 2030, and, by 2045, to reach carbon neutrality and reduce anthropogenic GHGs by 85 percent below 1990 levels. The proposed project would have minimal GHG emissions from project construction and negligible operation emissions. GHG emissions would be lower than the CAPCOA GHG emission screening level that was developed to achieve the AB 32 and Senate Bill (SB) 32 GHG reduction goals. Because the project would not hinder or otherwise conflict with AB 32 or the AB 32 scoping plan or plan updates for reducing GHG emissions, it would not conflict with an applicable plan, policy, or regulation adopted to reduce GHG emissions, and the impacts would be less than significant.

3.9 Hazards and Hazardous Materials

Table 3-9. Hazards and Hazardous Materials Checklist

Would the project:	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) 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?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site, which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

3.9.1 Setting

The project is located in downtown Bakersfield at 800 and 820 20th Street. The nearest school is approximately 0.01 mile north of the site, and two other schools are within 0.25 mile. Two public airfields are within 4.00 miles of the site. Meadows Field Airport is approximately 3.80 miles to the northwest, and Bakersfield Municipal Airport is approximately 3.20 miles to the south. The nearest fire station is at the Bakersfield Fire Department headquarters, approximately 0.55 mile west on 21st Street, and the nearest hospital is Kern Medical Hospital approximately 2.30 miles east of the project on Flower Street.

Operations at the former MGP ran from 1888 until 1910. The former MGP was on standby from 1910 into the mid-1940s, when the MGP structures were dismantled and removed, and the property was redeveloped. PG&E owned the property from the 1940s to the 1970s and redeveloped the primary facilities into an auto garage used for autobody repair and servicing. In the 1970s, City Body Works purchased the property and continued to use the property for automotive repairs (Jacobs 2023a). At the time, the building along the north boundary consisted of an elongated open-sided corrugated metal constructed building on concrete slabs. The building at the southeastern corner is constructed of brick over a cement slab-on-grade with a stucco exterior (AEC 2017). Fuel underground storage tanks had been previously located onsite but were removed during this time frame (Jacobs 2023a).

Voluntary soil removal activities are planned to remove residual contaminants in soil at the project site. The site has been well-characterized, with investigations conducted in 2017, 2018, 2022, and 2023 to assess and delineate areas of potential concern from former MGP operations. During these investigations, more than 550 soil and soil vapor samples were collected and analyzed for TPH, lead, PAHs, and other analytes. The gas manufacturing and purification processes at MGP facilities produced by-products and residues such as tars, oils, spent oxide wastes, and other hydrocarbon products that contain PAHs, petroleum hydrocarbons, benzene metals, and phenol. These wastes are considered potentially hazardous and contain a number of carcinogens (AEC 2017).

A human health risk assessment was completed in November 2023 to evaluate the potential for adverse health effects associated with the current or future land use conditions. Potential human receptors and exposure pathways were identified under current and reasonably foreseeable future site conditions for exposures to soil and soil vapor to indoor air. The exposure scenarios evaluated were for the future commercial worker, future construction worker, and future resident. Potential constituents of concern consisted of benzene, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, chloroform, chrysene, dibenzo(a,h)anthracene, indeno(1,2,3-cd)pyrene, naphthalene, tetrachloroethene, trichloroethene, TPH-diesel, and lead. For the human health risk assessment, site-specific risk-based concentrations were developed for soil and soil vapor that were used to determine target concentrations in soil and soil vapor for the remedial action (Jacobs 2023a).

3.9.2 Impact Analysis

a) **Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

LESS-THAN-SIGNIFICANT IMPACT. Project construction would require the use of typical hazardous materials such as solvents, paints, and fuels. These materials would be handled in accordance with standard procedures and federal, state, and local requirements. Hazardous material quantities required for use during construction would be small and would be used on an as-needed basis. Soil and other materials removed during the excavation activities would be managed in compliance with waste management regulations. Excavated soil would be segregated, characterized, and transported to offsite, permitted facilities. Prior to transporting and disposing of impacted soils, soil samples would be collected and analyzed to classify soil for offsite disposal. Former MGP soil that is excavated and characterized as nonhazardous may be sent to a Class II disposal facility, and soil characterized as hazardous would be sent to a Class I disposal facility (Jacobs 2023a). Therefore, potential impacts related to routine transport, use, or disposal of hazardous materials would be less than significant.

b) **Would the project 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?**

LESS-THAN-SIGNIFICANT IMPACT. A review of the Envirostor and GeoTracker databases did not identify other contaminated sites within the project area (DTSC 2024; SWRCB 2024). Soil data indicate widespread MGP-related constituents, primarily PAHs and naphthalene, as well as TPH-diesel, benzene, and lead, present at a variable range of concentrations and depths across the project site. These contaminants are labeled as potential constituents of concern and were identified for different exposure scenarios.

Soil and other materials removed during the excavation activities would be managed in compliance with waste management regulations. Excavated soil would be segregated, characterized, and transported to offsite, permitted facilities. Materials that would be stockpiled onsite would be stored within the perimeter of the fence and would not be placed directly on bare ground. Stockpiled soil would also be covered with plastic sheeting of appropriate thickness and secured with sandbags and other anchoring devices to reduce the impacts of potential conditions involving the release of hazardous materials into the environment.

Prior to transporting and disposing of impacted soils, stockpiled soil samples would be collected and analyzed to classify soil for offsite disposal. Former MGP soil that is excavated and characterized as nonhazardous may be sent to a Class II disposal facility (Jacobs 2023a). Federal, state, and local reporting requirements would be followed regarding the use of hazardous and nonhazardous materials at the project site, as described in Section 3.9.2(a).

The following BMPs detailed in the *Remedial Action Plan* (Jacobs 2023a) would be implemented to reduce potential impacts to less than significant:

- Reducing heavy equipment idling time
- Reducing truck idling time
- Using properly sized equipment
- Improving equipment maintenance
- Improving operator training
- Managing the soil stockpile
- Practicing good housekeeping
- Using straw wattles and a silt fence
- Sweeping streets
- Protecting storm drain inlets

To minimize potential impacts on human health and the environment, the following wind erosion measures derived from the California Stormwater Quality Association BMP Handbook (CASQA 2023) would also be implemented:

- Schedule construction activities to minimize exposed area.
- Quickly treat exposed soils using water, mulching, chemical dust suppressants, or stone/gravel layering.
- Identify and stabilize key access points before commencing construction.
- Minimize the impact of dust by anticipating the direction of prevailing winds.
- Restrict construction traffic to stabilized roadways within the project site, as practicable.
- Apply water by means of pressure-type distributors or pipelines equipped with a spray system or hoses and nozzles for even distribution.
- Equip all distribution equipment with a positive means of shutoff.
- Confirm that at least one mobile unit is available at all times to apply water or dust palliative to the project unless water is applied by means of pipelines.

Although use or transport of hazardous materials could result in a spill, all hazardous materials would be transported by a licensed transporter, and onsite use and management of these materials would be in conformance with all applicable laws and regulations. Therefore, the use or transport of hazardous materials would not create a significant risk to the public or the environment involving the release of hazardous materials into the environment, and potential impacts would be less than significant.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

LESS-THAN-SIGNIFICANT IMPACT. The nearest school, Downtown Elementary School, is approximately 0.21 mile west of the project site. During construction, the BMPs listed in Section 3.9.2(b) would be implemented to reduce the risk of release of hazardous emissions or hazardous materials in the vicinity of existing or proposed schools.

As described in Sections 3.9.2(a) and (b), typical hazardous materials used during construction, such as solvents, paints, and fuels, would be handled, used, stored, transported, and disposed of in accordance with standard procedures, including local, state, and federal regulations. Excavated soils would be transported by truck to one or more offsite waste facilities using U.S. Department of

Transportation-permitted transport vehicles. Trucking companies licensed to transport hazardous materials would be covered with a secure tarp and decontaminated prior to leaving the site. Transportation routes to the disposal facilities are anticipated to remain on paved local streets, state highways, and interstates. BMPs such as fugitive dust control and soil stockpile management would be implemented during excavation, stockpiling, and transport to reduce the risk of release of hazardous emissions. Therefore, the storage and handling of these materials would not represent a significant risk to existing schools, and potential impacts would be less than significant.

d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

NO IMPACT. The project site and immediately adjacent properties are not listed on the State of California Hazardous Waste and Substances Site List (also known as the Cortese List). The project site is currently subject to a Standard Voluntary Agreement (DTSC 2021) to govern remediation. Following construction, the site may be subject to proposed institutional controls if required. Examples of potential institutional controls are described in Section 1.8.4.

Hazardous materials found during construction would be handled in compliance with laws and regulations regarding transport, handling, disposal, and storage. Federal, state, and local reporting requirements would be followed regarding the use of hazardous and nonhazardous materials at the project site, as described in Section 3.9.2(a). Therefore, the construction-related activities at the project site are not expected to create a significant hazard to the public or the environment.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

NO IMPACT. The project site is approximately 3.2 miles north of the Bakersfield Municipal Airport. The project site is located outside of the Kern County Airport Land Use Compatibility Zone and project construction and operation would not interfere with airport activities (Kern County 2012). Therefore, the project would not result in or exacerbate airport-related safety hazards for people residing or working in the project area. Potential noise impacts are addressed in Section 3.13.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

LESS-THAN-SIGNIFICANT IMPACT. The local Bakersfield City Fire Department would serve the project site. The project does not include any permanent changes to the existing public roadways that provide emergency access to the site. As discussed in Section 3.10.2(d), Bakersfield would support its emergency operations plans with the procedures in Kern County's *Lake Isabella Dam Failure Evacuation Plan* (Robert Olson Associates 2009).

Construction-related activities are anticipated to take approximately 4 months and would likely result in a temporary, short-term increase in local traffic from construction-related workforce traffic and equipment and material deliveries. Traffic control measures such as cones, signs, and flaggers would be used on 20th, P, and Q street to direct and manage traffic around the site. To minimize potential traffic impacts on busier Q Street, only the access points on 20th and P streets would be used and trucks would enter via one of the access points and exit via the other. Truck loading would occur within the site boundary to the extent possible.

Construction activities would also temporarily close sidewalks and lanes adjacent to the site along P Street. Pedestrians may be directed to sidewalks on the opposite sides of the adjacent streets to avoid the construction zone and access points. As part of standard preconstruction activities, the contractor would prepare a traffic control plan so that minimum safety standards are met and would comply with local requirements in accordance with the Bakersfield Street and Encroachment Permits. While no major delays are anticipated, coordination with emergency responders would minimize any potential delays in response times from short-term construction activities. Therefore, the project would not impair the implementation of, or physically interfere with, any adopted emergency response plan or emergency evacuation plan, and potential impacts would be less than significant.

g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

NO IMPACT. Existing conditions would not change with the project. As described further in Section 3.20, the project site is not located in a mapped fire hazard severity zone; therefore, no impact would result (CAL FIRE 2007b).

3.10 Hydrology and Water Quality

Table 3-10. Hydrology and Water Quality Checklist

Would the project:	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on- or off-site;	☐	☐	☐	☒
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☐	☒
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☐	☒
iv) impede or redirect flood floods?	☐	☐	☐	☒
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

3.10.1 Setting

Bakersfield is in the Kern Island Canal-Frontal Kern Lake Bed watershed (Hydrologic Unit Code 180300031201), which covers about 213 square miles of the city and outlying areas in the San Joaquin Valley south of the Kern River (EPA 2024). Bakersfield is also within the boundary of, and subject to, the Kern River Groundwater Sustainability Agency's management plan (KRGSA 2022). The site is a relatively small area (0.79 acre) in downtown Bakersfield that does not discharge directly downstream to any surface waterbodies. Stormwater and other runoff flows into storm drains near the southwestern and southeastern corners of the site that feed into Bakersfield's MS4. The site is also in an area of minimal flood hazard (Zone X on Federal Emergency Management Agency [FEMA] Firm No. 06029C1819F, effective October 21, 2021). FEMA has not identified any flood hazards near the site associated with the Kern Island Canal (FEMA 2021).

While the project would include ground-disturbing activities, the disturbance area would be less than 1 acre. Therefore, National Pollutant Discharge Elimination System (NPDES) Construction General Permit requirements would not apply, including compliance with Bakersfield's NPDES-related MS4 discharge requirements (California RWQCB Central Valley Region 2016). The site is subject to the requirements of the *Water Quality Control Plan for the Tulare Lake Basin* (California RWQCB Central Valley Region 2018). In addition, Bakersfield has adopted the 2023 California Green Building Standards Code, which applies to projects that have less than 1 acre of ground disturbance.

3.10.2 Impact Analysis

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

LESS-THAN-SIGNIFICANT IMPACT. Construction would include ground-disturbing activities. However, water would be used for dust and odor suppression and truck decontamination during construction. Water used for dust and odor suppression is expected to infiltrate into the upper soil layer and evaporate. Truck decontamination would occur in an onsite secondary containment area, water would be retained onsite, and water would be disposed of offsite in accordance with federal, state, and local requirements. In addition, the dirt surface of the entire site would not be left bare but would be covered with about 6 inches of pervious, compacted gravel.

The site does not include any waterbodies or direct surface connections to offsite waterbodies, and depth to groundwater has been estimated at approximately 67 feet bgs (AEC 2017). Therefore, water used during project construction is not expected to enter surface waters or reach groundwater. Inadvertent runoff would enter Bakersfield's MS4. In addition, construction BMPs such as the following would be implemented to minimize inadvertent soil transport and runoff when it rains:

- Use standard erosion and sediment control BMPs pursuant to the most current version of PG&E's *Stormwater Field Manual for Construction Best Management Practices* to prevent construction site runoff into storm drains.
- Stockpile soil within established work site boundaries and locate stockpiles so as not to enter stormwater inlets. Cover stockpiled soil prior to rain.

Therefore, the project would not violate water quality standards or waste discharge requirements, would not substantially degrade surface or groundwater quality, and the potential impacts would be less than significant.

b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

LESS-THAN-SIGNIFICANT IMPACT. The primary onsite water source is a connection to the California Water Service's underground municipal pipeline network. However, construction water would likely come from Bakersfield's municipal water supply via a fire hydrant near the southeastern corner of the site. Water use during project construction would be metered, and PG&E would pay for water used based on flow meter readings.

Groundwater is Bakersfield's chief source of municipal water, and groundwater use must be consistent with the requirements of the Kern River Groundwater Sustainability Agency's management plan (KRGSA 2022). Consistent with such groundwater requirements, Bakersfield anticipates that it has a 50-year water supply and permits water use in accordance with its *2020 Urban Water Management Plan* (Bakersfield 2021a).

The purpose of the project is to remove contaminated soil from the project site. Excavation would occur early during construction, and excavated soil would be handled and disposed of offsite in accordance with federal, state, and local regulations. Construction would occur during dry months in late spring and summer. Removal of contaminated soil and low likelihood of rain would minimize the potential for contaminants to reach groundwater. Therefore, the project would not substantially decrease groundwater supplies or interfere with groundwater recharge, and the potential impacts would be less than significant.

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would:

The response to questions (i) through (iv) is “No Impact” because the project would not alter the existing drainage pattern of the site.

i. Result in substantial erosion or siltation on- or off-site;

NO IMPACT. The site is flat and, when construction starts, it would have some debris remaining from the demolition and removal of the three buildings and pavement. The site does not include any waterbodies and does not discharge directly downstream to offsite waterbodies. Stormwater discharges from the site would sheet-flow to local streets where stormwater would be collected into storm drains near the southwestern and southeastern corners of the site that feed into Bakersfield’s MS4. During construction, backfilled soils would be compacted and graded to drain into the same storm drains. In addition, the site would be permanently covered with compacted gravel, and BMPs would be implemented to minimize inadvertent sediment discharge in stormwater runoff. Post-construction, site grading and the pervious gravel surface would minimize sediment discharge in stormwater runoff. Therefore, the project would not alter the existing drainage pattern onsite or in the area or result in substantial erosion or siltation.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

NO IMPACT. As described in the response to Question 3.10.2(c)(i), the project would not alter the existing drainage pattern onsite or in the area. Additionally, the site would be covered with pervious, compacted gravel and BMPs would be implemented to minimize inadvertent runoff. Therefore, the project would not substantially increase the rate or amount of surface runoff.

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

NO IMPACT. As described in the response to Question 3.10.2(c)(i), the project would not alter the existing drainage pattern onsite or in the area. Additionally, the site would be covered with pervious, compacted gravel, and BMPs would be implemented to minimize inadvertent runoff. Therefore, the project would not substantially increase the rate or amount of surface runoff.

iv. Impede or redirect flows?

NO IMPACT. The site is not within a flood hazard zone, nor does it include any waterbodies or surface connections to waterbodies; therefore, the project would not impede or redirect flood flows.

d) Would the project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

NO IMPACT. Bakersfield is in Central California and is not near a coastal environment at risk for flood inundation. In addition, the city is not located within a tsunami zone (CDOC n.d.), nor is it near any lakes or waterbodies large enough to produce seiches. The site is located in Zone X, which is an area of minimal flood risk outside the 100- and 500-year floodplains (FEMA 2021).

Like most of Bakersfield, the site is located in the Lake Isabella flood inundation area (Kern County 2008), which is the area that would experience flooding in the event of a catastrophic failure of the Lake Isabella Dam about 42 miles to the northeast. Bakersfield would support its emergency operations plans with the procedures in Kern County’s *Lake Isabella Dam Failure Evacuation Plan* for the mass evacuation and short-term support of populations at risk below the dam (Robert Olson Associates 2009). Because of the site location outside of flood hazard, tsunami, and seiche zones and Bakersfield’s implementation of related emergency safety plans when needed, the project would not risk release of pollutants due to project inundation.

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

LESS-THAN-SIGNIFICANT IMPACT. Water used for dust and odor suppression is expected to infiltrate into the upper soil layer and evaporate. Truck decontamination would occur in an onsite secondary containment area, water would be retained onsite, and water would be disposed of offsite in accordance with federal, state, and local requirements. Construction water would likely come from Bakersfield's municipal water supply. Construction BMPs would be implemented to minimize non-stormwater discharges. Any inadvertent runoff from the project site would enter Bakersfield's MS4. While the project would not require an NPDES permit, water use and stormwater discharges would be subject to Bakersfield's municipal requirements under the *Water Quality Control Plan for the Tulare Lake Basin* (California RWQCB Central Valley Region 2018) and the *Final Amended Groundwater Sustainability Plan* (KRGSA 2022). Therefore, the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

3.11 Land Use and Planning

Table 3-11. Land Use and Planning Checklist

Would the project:	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

3.11.1 Setting

The project site is located in an older, highly developed section of downtown Bakersfield. Current land uses in the area include a variety of light industrial and commercial activities, residential clusters, and community spaces such as churches, schools, a park, and museums. The parcels adjacent to the project site are designated for Mixed Use Commercial (MUC) land uses in the *Metropolitan Bakersfield General Plan Map* (Bakersfield 2021c). Other nearby land use designations include light industrial, residential, and recreational. The MUC land use designation is intended for major commercial centers with professional office, major retail, and commercial support services, as well as integrated medium- and high-density residential uses. The area around the project site is also zoned as Commercial Center (C-C) in *Bakersfield Municipal Code* Chapter 17.26. The C-C zone is intended for large-scale, mixed-use developments with commercial and high-density residential uses.

Two other Bakersfield plans (Bakersfield 2018, 2021b) are applicable to the project area. Q Street is identified as a collector and P and 20th Streets are identified as local streets in the *Downtown Bakersfield Corridor Enhancement Master Plan* (Bakersfield 2021b). The plan recommends streetscape projects on "side streets" such as Q, P, and 20th Streets. As part of the project restoration phase, disturbed sidewalks would be returned to preconstruction conditions, and adjacent streets would not be permanently changed. Therefore, the project would not prevent or conflict with planning for, or implementation of, future streetscape projects.

Bakersfield's planning efforts related to the California High-Speed Rail include a conceptual plan for stations and redevelopment in downtown Bakersfield (Bakersfield 2018). The project area is in the conceptual plan's "Respond" development zone and Mill Creek District; "Respond" has a 10-year planning horizon to strengthen downtown's historic core. Post-construction, the former MGP property would be a fenced, vacant, gravel lot and, as such, would not prevent or conflict with planning for, or implementation of, redevelopment projects either in the "Respond" development zone or the Mill Creek District.

No other Bakersfield specific area plans are applicable to the project area. Because the project site is located in incorporated Bakersfield, the *Kern County General Plan* (Kern County 2009) does not apply to this land use analysis.

3.11.2 Impact Analysis

a) Would the project physically divide an established community?

NO IMPACT. The project would be a continuation of the urban development and redevelopment patterns in downtown Bakersfield since the late 1800s. The project would not include a long and linear feature, such as a freeway, railroad track, or block wall that would have the potential to divide a community. The project involves remediation within PG&E's finite and contiguous 0.78-acre infill site, which would not impede existing or future movement or development around the site. Therefore, the project would not physically divide an established community.

b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

NO IMPACT. Currently, the site is a vacant asphalt lot with some debris. Post-construction, the site would be a vacant gravel lot, would not have any structures or utilities, and therefore would not change the existing or potential land uses in and around the site. Future structures and land uses, if proposed on the former MGP property, would be subject to CEQA and would be required to either be consistent with the current land use designation and to comply with the current zoning ordinances or to obtain a general plan amendment and/or zone change. Therefore, the project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

3.12 Mineral Resources

Table 3-12. Mineral Resources Checklist

Would the project:	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

3.12.1 Setting

The Bakersfield region is a major oil-producing area, with substantial oil and natural gas fields surrounding the city. Prior to 1910, the former MGP was processing gas piped in from nearby oil fields but was placed on stand-by in 1910 when natural gas was produced at the oilfields instead of in town. Therefore, oil and natural gas are not present in the project area. The closest well drilled is a dry hole that was plugged about 0.65 mile north of the site. The closest active oil and gas well is more than 2.00 miles northwest of the site on the other side of the Kern River (CDOC 2024d).

Gravel is another mineral resource in the Bakersfield region; extraction is concentrated primarily along the floodplains and alluvial fan of the Kern River. The site is on the edge of a mineral resource zone with a high likelihood that mineral deposits for use in aggregate and concrete are present. However, the site and adjacent areas are not included in a designated mineral resource sector because they are in urbanized, downtown Bakersfield. The closest mineral resource sector is 1.50 miles away along the Kern River (CDOC 2009). Furthermore, the site and surrounding areas are planned and zoned for mixed-use, commercial, light industrial, recreational, or residential land uses and are not zoned R-MP (Mineral and

Petroleum), which allows extraction of mineral resources (Bakersfield 2023b). Therefore, the site is not located in an area of available mineral resources.

The California Department of Conservation Division of Mine Reclamation’s list of mines, referred to as the AB 3098 List and regulated under the Surface Mining and Reclamation Act, does not include any mines near the site. The closest mine is about 9.00 miles northwest of the site (CDOC 2016b, 2024c).

3.12.2 Impact Analysis

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

NO IMPACT. No oil or natural gas are present, and deposits for use in aggregate and concrete are the only mineral resources potentially associated with the site. However, the site is not zoned for mineral extraction, is urbanized, and is not part of a designated mineral resource sector where resource extraction may be permitted. Therefore, because no available mineral resources are located within 1.50 miles of the site, the project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

NO IMPACT. The site is not within a designated mineral resource sector where resource extraction may be permitted (CDOC 2009). The site is currently planned and zoned for mixed-use, commercial land uses. No portion of the site is designated for a potential mineral resource extraction use such as R-MP (Mineral and Petroleum) (Bakersfield 2023b). Therefore, the project would not result in the loss of availability of a locally important mineral resource recovery site that is delineated in a local general plan, specific plan, or other land use plan.

3.13 Noise

Table 3-13. Noise Resources Checklist

Would the project result in:	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☒	☐	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

3.13.1 Setting

The project site is located in an older, highly developed section of downtown Bakersfield. Current land uses in the area include a variety of light industrial and commercial activities, residential clusters, and community spaces such as churches, schools, a park, and museums. Noise-sensitive receptors in the project vicinity include the following:

- Three-story apartment building, 55 feet west
- Church with outdoor playground, 180 feet west
- Single-family homes, 300 feet north-northwest

- Church with school and outdoor playground, 575 feet north-northwest
- Three-story apartment building, 400 feet north
- Townhome community, 500 feet northeast
- Park, museum, and community center, 425 feet east

No hospitals, libraries, hotels/motels, or other residences, schools, and recreational areas are in the project vicinity. Because the existing vacant lot would continue to be vacant following construction, the project would not have operational noise impacts, and potential noise impacts would be solely associated with temporary construction activities. Existing noise levels are assumed to be typical of urban development with commercial and industrial land uses and a mix of cars and trucks using local roads and arterials in the project vicinity.

Applicable plans and ordinances include the *Metropolitan Bakersfield General Plan* (Bakersfield 2016) and the *Bakersfield Municipal Code*. Noise requirements from these plans are as follows:

- **General plan**. The purpose and goals of the Noise Element (Chapter VII) are to limit the exposure of the community to excessive noise levels. To this end, the plan includes land use compatibility guidelines that dictate acceptable noise levels for different land use categories (e.g., residential, commercial, industrial) and noise level performance standards for how loud stationary noise sources can be during the day and at night. These prescriptive noise levels were developed based on a 1986 community noise survey. The general plan does not address construction noise. With respect to vibration, the plan requires industrial land uses to reduce vibration impacts on residences, but does not address construction-related vibration impacts.

  The Circulation Element (Chapter III) includes the goal of minimizing the impact of truck traffic on noise-sensitive land uses.

- **Municipal code**. *Bakersfield Municipal Code* 9.22.050, Noise during construction, prohibits construction before 6:00 a.m. and after 9:00 p.m. on weekdays, and before 8:00 a.m. and after 9:00 p.m. on weekends. Short-term exceptions can be made by the City Manager, and the ordinance does not apply to emergency work or to construction 1,000 feet or more from the nearest residential dwelling. Beyond the time-of-day restrictions, the construction noise ordinance does not have additional requirements for construction near noise-sensitive receptors. The *Bakersfield Municipal Code* does not include vibration level limits.

The PG&E parcel is a fenced, vacant asphalt lot with some demolition debris. The parcel would then become a fenced, vacant gravel lot following construction, and noise would not be generated from the former MGP property. Therefore, operational noise and vibration requirements would not apply to this project, and they are not addressed further in this analysis.

3.13.2 Impact Analysis

a) Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

LESS-THAN-SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED. Project construction would temporarily increase ambient noise levels in the project vicinity while construction occurs. Noise generated during construction would vary depending on construction activities. Most individual pieces of construction equipment would generate noise levels of 80 to 90 A-weighted decibels (dBA) at 50 feet from the source, and dissipate with distance at a rate of 6 dBA per doubling of distance (e.g., 74 to 84 dBA at 100 feet; 68 to 78 dBA at 200 feet).

The contractor would comply with Bakersfield's municipal construction noise ordinance, which allows construction from 6:00 a.m. to 9:00 p.m. on weekdays and from 8:00 a.m. to 9:00 p.m. on weekends (*Bakersfield Municipal Code* 9.22.050, Noise during construction). Major construction work is expected to occur Monday through Friday (and possibly Saturday) between 7:00 a.m. and 6:00 p.m., to the extent feasible. Construction would not occur on Sundays or holidays, and in accordance with the municipal noise ordinance, before 8:00 a.m. on Saturdays. In addition, project construction would proceed in accordance with the *Remedial Action Plan* (Jacobs 2023a).

Therefore, the project would not generate substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. With the implementation of the MMs listed in Section 3.13.3, potential impacts would be less than significant.

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

LESS-THAN-SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED. Pile driving and shoring installation would potentially occur in about 25 percent of the site where excavation would exceed 4 feet or adjacent slopes cannot be cut back and sloped. Pavement and sidewalk breaking would occur across half of the site (0.40 acre) where asphalt would remain after the building demolition, and in a 35-foot-long segment of sidewalk adjacent to P Street. In total, these activities would occur over 5 weeks of the 4-month construction duration. Pile driving and shoring installation would be limited to less than 10 days for a few hours each day.

The closest structures to the project site, about 25 feet across the alley to the north, include an auto repair shop and a Lumen Technologies data center. These structures would be about 40 feet and 50 feet, respectively, away from the closest pile driving or shoring installation. The closest residential structure, about 55 feet across P Street to the west, is a three-story apartment building (currently under construction) that will be occupied in summer 2024 before project construction starts. This apartment building would be almost 100 feet away from the closest pile driving or shoring installation.

The potential for generation of excessive ground-borne vibration or ground-borne noise levels would be limited to hours of construction and would be temporary in nature. After the project is complete, no ground-borne vibration or ground-borne noise would emanate from the site. Therefore, with the implementation of the MMs listed in Section 3.13.3, the project would not generate excessive ground-borne noise or vibration, and the impacts would be less than significant.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

NO IMPACT. The project site is located approximately 3.2 miles north of the Bakersfield Municipal Airport and is not within any of the compatibility zones identified in the *Airport Land Use Compatibility Plan* (Kern County 2012). Therefore, in combination with ambient airport noise, the project would not expose people residing or working in the project area to excessive noise levels.

3.13.3 Mitigation Measures

To minimize noise- and vibration-related impacts during construction, PG&E would implement the following MMs:

1) **MM NOI-1 (General Construction Noise Management)**. PG&E will employ standard noise-reducing construction practices such as the following:

- Comply with manufacturer's muffler requirements on all construction equipment engines and ensure exhaust mufflers are in good condition.
- Turn off construction equipment when not in use, where applicable.
- Locate stationary equipment, construction staging areas, and construction material areas as far as practical from sensitive receptors.
- Include noise control requirements for construction equipment and tools in specifications provided to construction contractors to the maximum extent practicable, including performing all work in a manner that minimizes noise.
- Provide written notice at least 1 week prior to planned construction activities to all sensitive receptors and residences within approximately 500 feet of the project site. PG&E also will post notices in public areas, including recreational use areas, within approximately 500 feet of the project site. The announcement will state approximately where and when construction will occur

in the area, including truck routes and access points. Notices will provide tips on reducing noise intrusion: for example, by closing windows facing the planned construction. PG&E will identify a public liaison to respond to concerns of neighboring receptors during construction, including residents, about construction noise disturbance. PG&E also will establish a toll-free telephone number for receiving questions or concerns during construction and develop procedures for responding to callers. Contact information for reaching the PG&E public liaison officer by telephone or in person will be included in the notices and also posted conspicuously at the construction sites. PG&E will respond to questions or concerns received.

2) **MM NOI-2 (Noise Minimization with Portable Barriers)**. Compressors and other small stationary equipment used during construction of PG&E project components will be shielded with portable barriers if appropriate and if located within approximately 200 feet of a residence.

3) **MM NOI-3 (Noise Minimization with Quiet Equipment)**. Quiet equipment will be used during construction of PG&E project components whenever possible (e.g., equipment that incorporates noise-control elements into the design, such as quiet model compressors or generators, can be specified).

4) **MM NOI-4 (Noise Minimization through Direction of Exhaust**). When in proximity to noise-sensitive uses, PG&E equipment exhaust stacks and vents will be directed away from those noise-sensitive uses where feasible.

5) **MM NOI-5 (Noise Disruption Minimization through Residential Notification**). If nighttime construction is necessary for PG&E project components—for example, if certain activities need to continue to completion—affected residents will be notified in advance by mail, personal visit, or door-hanger, and will be informed of the expected work schedule.

6) **MM NOI-6 (Noise Minimization Equipment Specification**). PG&E will specify general construction noise reduction measures that require the contractor to ensure that all equipment is in good working order, adequately muffled, and maintained in accordance with the manufacturers' recommendations.

7) **MM NOI-7 (Incorporate Vibration Assessment into Project Construction**). Where pile driving may be required adjacent to residential or commercial uses, final design efforts and construction methods will account for soils and hammer type and use when assessing the potential for vibration. Vibration monitoring will be conducted during pile driving activities and in response to a complaint, to confirm that vibration levels are within acceptable guidelines. Site-specific minimization measures such as modifying the type of hammer, reducing hammer energy, or modifying hammer frequency will be implemented as necessary to reduce the potential effects of offsite vibration. Monitoring may be reduced or eliminated when it has been established that these measures, if required, are effective for the site conditions.

3.14 Population and Housing

Table 3-14. Population and Housing Checklist

Would the project:	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

3.14.1 Setting

The project is in downtown Bakersfield in an area generally dominated by light industrial and commercial activities, with a few residential clusters, community spaces, and vacant lots (Figure 2). The closest existing residences are about 300 feet north of the site on P Street. However, a three-story, 30-unit luxury apartment building called 918, currently under construction on P Street west of the site, will be ready for occupancy in summer 2024. Three other three- to four-story luxury apartment and townhome developments have been built or are planned within 900 feet of the project site (Sage Equities 2024).

The area around the project site had very little housing stock up until 2017 when Sage Equities began construction on the first of four luxury rental communities. Prior to 2017, the townhomes 500 feet northeast of the site were the most recent addition to the housing stock in 2005. More than 90 residential units in two of the new luxury developments are currently leasing, and that number will rise to about 125 when 918 is ready for occupancy. By the end of 2024, when the fourth development is complete, Sage Equities will have added almost 160 residential units as part of the company's efforts to revitalize the "hip new Eastchester neighborhood" in downtown Bakersfield (Sage Equities 2024).

3.14.2 Impact Analysis

a) Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

NO IMPACT. Remediation contractors typically work with specialized crews that have the necessary remediation training and skills. Therefore, the construction workforce is expected to travel from outside of Bakersfield and Kern County to the project site. However, construction would be temporary with a duration of 4 months and approximately 8 onsite workers. The short-term nature of the project and the low number of workers would not induce growth or require new homes, businesses, or infrastructure to accommodate the project or workforce.

The action subject to CEQA and analyzed in this Initial Study would not include construction of new homes, businesses, or other infrastructure that would induce population growth in the area. The potential for and type of future development on the former MGP property is unknown at this time; therefore, it would be speculative to consider potential future housing as a contributing factor to future indirect or cumulative impacts. Future onsite developments will be considered separate CEQA actions and will be subject to CEQA compliance prior to construction or implementation. Therefore, the project would not directly induce substantial unplanned population growth in the area.

b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

NO IMPACT. The site is contained within PG&E's 0.78-acre parcel previously used for industrial and commercial purposes and approximately 700 square feet of the adjacent P Street ROW. No housing is or has ever been present onsite. Therefore, the project would not displace existing housing or necessitate the construction of replacement housing elsewhere.

3.15 Public Services

Table 3-15. Public Services Checklist

Would the project:	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
i) Fire protection?	☐	☐	☒	☐
ii) Police protection?	☐	☐	☒	☐
iii) Schools?	☐	☐	☐	☒
iv) Parks?	☐	☐	☐	☒
v) Other public facilities?	☐	☐	☐	☒

3.15.1 Setting

Public services and facilities are provided and maintained by the following Bakersfield municipal divisions:

- Fire Department; headquarters approximately 0.55 mile west on 21st Street
- Police Department; headquarters about 0.56 mile southwest on Truxtun Avenue
- Bakersfield City School District
- Recreation and Parks Department
- Public Works Department

3.15.2 Impact Analysis

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services?

The need for additional public services or government facilities is directly correlated to population growth and the resultant need for services beyond what is currently available. The action subject to CEQA and analyzed in this Initial Study would not include construction of new homes, businesses, or other infrastructure that would substantially increase permanent population in the area or temporary visitor use of the area. The potential for and type of future development on the former MGP property is unknown at this time; therefore, it would be speculative to consider potential future population growth or visitation as a contributing factor to future indirect or cumulative impacts on public services. Future onsite developments will be considered separate CEQA actions and will be subject to CEQA compliance prior to construction or implementation. Therefore, the project would not result in substantial adverse physical impacts, significant environmental impacts, or adverse impacts on acceptable service ratios, response times, and other public service performance objectives.

i. Fire protection?

LESS-THAN-SIGNIFICANT IMPACT. Emergencies could occur at the project site during construction; however, excavation, backfilling, and restoration activities are not anticipated to increase the potential for onsite fires. Coordination with local emergency service providers before construction starts would minimize impacts from project elements (e.g., lane closures) that could affect emergency response times. Water would be available onsite at all times during construction, and construction water could be used for fire suppression if needed while waiting for the fire department to respond. Therefore, potential impacts on fire protection would be less than significant.

ii. Police protection?

LESS-THAN-SIGNIFICANT IMPACT. Emergencies could occur at the project site during construction. Temporary construction activities, including excavation, backfilling, and restoration activities, would only occur for 4 months and, thus, are not anticipated to increase the demand for police protection or result in the need for new or altered police stations. In addition, the project site would be fenced, and PG&E would implement security measures when workers are not onsite. Coordination with local emergency service providers before construction starts would minimize impacts from project elements (e.g., lane closures) that could affect emergency response times. Therefore, potential impacts on police protection would be less than significant.

iii. Schools?

NO IMPACT. The project would not increase the local population or otherwise result in additional students for area schools because the fenced, vacant asphalt lot with some demolition debris would become a fenced, vacant gravel lot following construction. Therefore, the project would not affect schools.

iv. Parks?

NO IMPACT. Refer to Section 3.16, Recreation, for more information.

v. Other public facilities?

NO IMPACT. The project would not increase the local population or otherwise result in additional demand for public facilities because the fenced, vacant asphalt lot with some demolition debris would become a fenced, vacant gravel lot following construction. Therefore, the project would not affect other public facilities.

3.16 Recreation

Table 3-16. Recreation Checklist

	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

3.16.1 Setting

The closest recreational facility, about 425 feet east of the site, is Central Park, which includes the Bakersfield Community Center, Bakersfield Museum of Art, and a portion of the Mill Creek Linear Park. Central Park also provides a playground, walking paths, and seating along the western bank of the Mill Creek Linear Park.

3.16.2 Impact Analysis

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

NO IMPACT. Soil excavation, site restoration, sampling, and institutional controls would not drive population growth or otherwise induce growth in an extensively developed area. For the duration of construction (about 4 months), onsite workers would be in the area for about 8 hours per day, 5 days per week and may visit Central Park during breaks. However, such visits would be short (less than 1 hour) and infrequent (only 8 personnel expected onsite each day). Post-construction sampling specialists would be in the area on three occasions for short visits to the site.

The action subject to CEQA and analyzed in this Initial Study would not include construction of new homes, businesses, or other infrastructure that would substantially increase the use of existing parks in the area. The potential for and type of future development on the former MGP property is unknown at this time; therefore, it would be speculative to consider potential future population growth as a contributing factor to future indirect or cumulative impacts on recreation. Future onsite developments will be considered separate CEQA actions and will be subject to CEQA compliance before construction or implementation. Therefore, the project would not cause or accelerate the substantial physical deterioration of such facilities.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

NO IMPACT. The project scope does not include construction or expansion of any new or existing recreational facilities. Therefore, the project would not have an adverse physical effect on the environment from construction related to recreational facilities.

3.17 Transportation

Table 3-17. Transportation Checklist

Would the project:	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

3.17.1 Setting

The transportation elements of this project would involve the temporary use of existing roadways by construction equipment and crews to access the project site. The site is located in downtown Bakersfield, north of 20th Street between P and Q Streets, as shown on Figures 1-2 and 1-3 in Section 1, Background Information.

The area around the site is served by urban streets with one or two lanes of traffic in each direction. The intersections adjacent to the site are controlled by stop signs on the minor streets. The closest signalized intersections are on Q Street, at the intersections of 19th and 21st Streets to the north and south. As shown on Figure 1, regional access to and from downtown Bakersfield is provided by state and local freeways and major arterials, including the following:

- SR 204/SR 99 Business/Golden State Avenue is a major arterial with generally three through-lanes in each direction. The roadway runs north-south to the east of the site, and turns to the northwest to connect with SR 99 north of downtown.
- California Street and Truxtun Avenue are major arterials with generally three through-lanes in each direction, wide medians, and signals at major cross-streets. Both run east-west to the south of the site.
- SR 178/23rd Street/24th Street is a two-way couplet with generally four through-lanes in each direction, north of the site. SR 178 is a grade-separated facility with an interchange at SR 204 and three through-lanes in each direction to the east, where it eventually transitions to an at-grade, rural highway into the mountain and communities to the east. To the west, SR 178 connects to an interchange with SR 99 before continuing as Rosedale Highway, a regional facility.
- West of the site, SR 99 is a major freeway serving western Bakersfield and the California Central Valley. It begins south of Bakersfield where it splits from Interstate 5 and continues north of Sacramento to Red Bluff (more than 400 miles).

Access to the site from outside Bakersfield would be via the following:

- Q Street, SR 204, and SR 99 to and from the north
- Q Street, California Avenue, and SR 99 to and from the south or west
- Local streets connecting to SR 178 to and from the east

Transit service is available or planned near the project site, including the following:

- Golden Empire Transit District provides local bus service in Bakersfield. Most service near the site originates at the Downtown Transit Center, approximately 0.5 mile west of the site. Route 43 (with a stop on 21st Street near N Street) and Routes 45, 100, and 130 (with a stop on Truxton Avenue near O Street) are the closest service.
- Kern Transit provides bus service for Bakersfield and surrounding communities. The bus service closest to the site is Route 100 (Bakersfield-Lancaster), with stops on Truxtun Avenue near M and O Streets. Service is six to seven times daily on weekdays, and three times daily on weekends.
- The planned California High-Speed Rail includes a conceptual location for a future commuter rail station on Truxtun Avenue, approximately 0.4 mile southeast of the site (Bakersfield 2018).

Bakersfield also provides pedestrian and bicycle facilities near the project site, including the following:

- Dedicated (striped) bike lanes are provided on Q Street and 21st Street.
- Most roads in the vicinity of the site have sidewalks on both sides of the streets, with crosswalks and curb ramps at most intersections.

3.17.2 Regulatory Background

SB 743 (2013) addresses the limitations of measuring impacts using level-of-service analysis and provides an alternative to using level of service in the environmental review process. The focus is on assessing project-related changes in vehicle miles traveled (VMT). Guidance issued by the Governor's Office of Planning and Research (OPR), which implements changes to CEQA from SB 743, indicates that transportation analysis is project-dependent. The guidance also provides technical recommendations related to VMT assessment, thresholds of significance, and mitigation measures (OPR 2018).

The *Metropolitan Bakersfield General Plan* was adopted in December 2002 and most recently updated in 2016 (Bakersfield 2016).[4] The Circulation Element (Section III) addresses streets, transit, bikeways, and

[4] The general plan has not been updated since 2016, although a plan update process is underway. Adoption of a new general plan is scheduled for 2026 (Bakersfield 2024).

parking. Supporting policies focus on design standards and image/aesthetics. No quantitative requirements are included. The seven goals for the street system are listed as follows:

1. Provide a safe and efficient street system that links all parts of the area for movement of people and goods.
2. Provide for safe and efficient motorized, non-motorized, and pedestrian traffic movement.
3. Minimize the impact of truck traffic on circulation, and on noise sensitive land uses.
4. Provide a street system that creates a positive image of Bakersfield and contributes to residents' quality of life.
5. Provide a system of freeways which maintains adequate travel times in and around the metropolitan area.
6. Provide a local street network that contributes to the quality and safety of residential neighborhoods and commercial districts.
7. Develop and maintain a circulation system that supports the land use plan shown in the general plan.

The *Kern County General Plan* (Kern County 2009) includes a circulation element that has not been updated since the early 2000s. However, the *Kern County General Plan* excludes the transportation system covered by the *Metropolitan Bakersfield General Plan* (Bakersfield 2016) and, therefore, does not apply to this analysis.

3.17.3 Impact Analysis

The site can be accessed by gates on P Street, Q Street, and 20th Street. However, to minimize potential conflicts on Q Street (which has more activity), PG&E plans to use the site entrances on P Street and 20th Street for truck access as much as possible. Truck loading would generally be conducted within the site boundary to the extent feasible. A site access plan outlining the locations of vehicular access and exit points would be prepared before construction begins.

The remediation activities requiring transportation resources would include the following:

- Removal of material (slabs, foundations, or other surface materials and debris) prior to excavation
- Offsite disposal of debris
- Soil excavation and offsite disposal
- Site restoration via importing, backfilling, and compacting clean material, and surface grading and compacting the gravel surface

After remediation is complete, intermittent onsite sampling would occur on the vacant site, with negligible associated transportation activities.

During remediation, traffic control plans would be developed and implemented to restrict access to work areas and reroute pedestrian traffic as required, and would be approved by Bakersfield as part of the project permitting process. Traffic control measures may include access control for temporary lane closures or access restrictions on adjacent streets. Access control may include cones, barricades, and temporary fencing.

When excavation extends into the sidewalks on P Street, the northbound lane would be closed, and flaggers would direct motorists to alternate using the southbound lane. This short-duration lane closure would occur during construction hours for about 2 weeks. Other traffic control measures would be implemented if needed on 20th Street, P Street, and Q Street.

During project construction, site traffic would consist of trucks delivering equipment and materials, personnel and support vehicles accessing the site, and trucks transporting materials onto and off the site. State-licensed transporters would provide trucking to transport the soil offsite. Stockpiling of materials would be maintained within the PG&E parcel boundary to the extent possible. Truck transportation would operate from Monday through Friday between 7:00 a.m. and 5:00 p.m.

During excavation, it is estimated that approximately 5,832 loose cubic yards (4,860 bank cubic yards) of soil contaminated with potential constituents of concern would be removed. This amount represents approximately 7,290 tons of excavated soil. Assuming each truck carries approximately 20 tons per load, an estimated 365 truckloads of material would leave the site. It is estimated that an average of approximately 20 trucks per day (2 to 3 per hour in an 8-hour-per-day period) would leave the site when waste is being hauled away.

Construction-related traffic would generally use one entry point and one exit point at any given time. However, the active entry and exit points may change over the course of construction. Trucks would enter and leave the site during daylight hours only. No truck transportation would be initiated in darkness or during inclement weather conditions, such as heavy rains, poor visibility, or high winds.

Before starting work, a traffic control plan would be prepared in accordance with the current *California Manual on Uniform Traffic Control Devices* (Caltrans 2023) and local regulatory guidelines, as required.

a) Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities?

LESS-THAN-SIGNIFICANT IMPACT. No permanent physical changes to local streets would occur within the circulation system, including transit, roadways, bicycle, and pedestrian facilities. Similarly, construction activities would not conflict with plans, policies, or ordinances associated with the transportation system. Construction activities would temporarily generate additional traffic along roadways in the vicinity of the project site as a result of construction workers and haul trips. Traffic increases would not result in a substantive change in the operation of the local or regional system. Construction activities would also temporarily close sidewalks and lanes adjacent to the site along P Street.

As part of standard preconstruction activities, the contractor would prepare a traffic control plan so that minimum safety standards are met. The traffic control plan would be consistent with the *California Manual of Uniform Traffic Control Devices* (Caltrans 2023), the *Work Area Traffic Control Handbook* (WATCH Committee 2019), and local requirements in accordance with the Bakersfield Street and Encroachment Permits. If required to obtain the local permits, a transportation management plan would be developed to address potential effects of construction activities on vehicular, transit, pedestrian, and bicycle access, and would include strategies to address any issues.

Based on this assessment, the project would not conflict with Bakersfield programs, plans, ordinances, or policies that address the circulation system, including transit, roadways, and bicycle and pedestrian facilities, and potential impacts would be less than significant.

b) Would the project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

LESS-THAN-SIGNIFICANT IMPACT. SB 743, which was codified in Public Resources Code § 21099, required OPR to establish new CEQA Guidelines “for determining the significance of transportation impacts of projects within transit priority areas. Those criteria shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.” The new criteria were required to move away from vehicle delay and level-of-service metrics and move toward more multimodal concepts “that may include, but are not limited to, VMT, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated.”

In 2018, § 15064.3 was added to the CEQA Guidelines to reflect the provisions of SB 743. The section addresses both land use and transportation projects and broadly describes the methodology, including the potential for qualitative analysis, used to assess VMT. Agencies are given “broad discretion” to select the methodology for analysis or even to apply a qualitative approach. OPR prepared *Technical Advisory on Evaluating Transportation Impacts in CEQA* (OPR 2018) to address a variety of projects, with the recognition that the approach for evaluating impacts is necessarily project-specific. Bakersfield and Kern County have not yet developed significance thresholds based on VMT.

Because VMT thresholds have not been adopted, *Technical Advisory on Evaluating Transportation Impacts in CEQA* (OPR 2018) was used as a reference for assessing VMT. The guidelines are focused on land development and transportation projects and their long-term effects on VMT. The OPR guidance states that “absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact” (OPR 2018).

In addition, no specific guidance is available for assessing temporary VMT impacts during project construction. As summarized in the Construction Emissions Calculations (Appendix B), approximately 50 daily worker and haul truck trips would be generated during construction. Even though OPR’s VMT guidance is not applicable for assessing construction-related VMTs, project construction would generate less than 50 percent of OPR’s significance threshold of 110 trips per day.

The action subject to CEQA and analyzed in this Initial Study would not include construction of new homes, businesses, or other infrastructure that would generate or attract new daily trips in the area. The potential for and type of future development on the former MGP property is unknown at this time; therefore, it would be speculative to consider future trip generation in this analysis. Future onsite developments will be considered separate CEQA actions and will be subject to CEQA compliance prior to construction or implementation. Therefore, the project would not conflict or be inconsistent with CEQA Guidelines §15064.3(b), and potential impacts associated with increased VMT would be less than significant.

c) 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)?

LESS-THAN-SIGNIFICANT IMPACT. The project does not include any permanent changes to existing geometric design features. During construction, any potential temporary modification of the existing transportation facilities would be addressed by a traffic control plan to be submitted to Bakersfield for review and approval prior to construction and by the requirements of the local Street and Encroachment Permits. Therefore, the project would not substantially increase hazards due to geometric design features, and potential traffic impacts would be less than significant.

d) Would the project result in inadequate emergency access?

LESS-THAN-SIGNIFICANT IMPACT. The project would not change existing emergency vehicle access routes in the area. With the implementation of a traffic control plan and compliance with the local Street and Encroachment Permits, which would require coordination with emergency responders, no substantive effects on emergency response or evacuation plans or emergency service providers would occur. Similarly, during construction, emergency vehicles would still be able to access the project site and surrounding facilities. While no major delays are anticipated, coordination with emergency responders would minimize any potential delays in response times from short-term construction activities. Therefore, the project would not result in inadequate emergency access, and potential traffic impacts would be less than significant.

3.18 Tribal Cultural Resources

Table 3-18. Tribal Cultural Resources Checklist

	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☒	☐	☐
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

3.18.1 Setting

Tribal Cultural Resources (TCRs) as defined by Public Resources Code § 21074 are either (1) sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either on or eligible for inclusion in the CRHR or a local historic register; or (2) a resource that the lead agency, at its discretion and supported by substantial evidence, chooses to treat as a TCR. Additionally, a cultural landscape may also qualify as a TCR if it meets the criteria to be eligible for inclusion in the CRHR and is geographically defined in terms of the size and scope of the landscape. Other historical resources (as described in Public Resources Code § 21084.1), including unique archaeological resources (as defined in Public Resources Code § 21083.2[g]) or nonunique archaeological resources (as described in Public Resources Code § 21083.2[h]), may also be TCRs if they conform to the criteria to be eligible for inclusion in the CRHR.

Background research finds no indigenous archaeological sites or other potential TCRs within 0.25 mile of the API. The absence of such resources within 0.25 mile, distance from natural freshwater sources, and extent of past disturbance from urban development suggest that the likelihood of the discovery of potential TCRs by implementation of the project is low.

3.18.2 Impact Analysis

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

LESS-THAN-SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED. As described in Section 3.5, no listed historical resources or resources eligible for listing are known to be present in the API. However, it is possible that previously unrecorded historical resources may be present. Impacts would be less than significant with implementation of MM CUL-1 through MM CUL-3 (Section 3.5.3).

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

LESS-THAN-SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED. AB 52 requires lead agencies to conduct formal consultations with California Native American tribes during the CEQA process to identify tribal cultural resources that may be subject to significant impacts by a project. Where a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document must discuss the impact and whether feasible alternatives or mitigation measures could avoid or substantially lessen the impact. This consultation requirement applies only if the tribes have sent written requests for notification of projects to the lead agency.

In July 2024, the DTSC formally notified the tribes identified in the NAHC listing. By August 13, 2024, no tribal Government responded to the AB52 Consultation letter and requested consultation. In addition, the tribes communicated with did not identify any known tribal cultural resources that may be affected by the proposed project. However, the proposed project includes a standard operating procedure whereby all possible damages caused in the event of an unanticipated discovery can be avoided. Specifically, if tribal cultural resources are discovered during remedial actions, work would stop in that area until a qualified archaeologist or appropriately licensed professional can assess the significance of the find and, if necessary, develop appropriate response measures in consultation with the DTSC and other agencies and Native American representatives, as appropriate. As previously stated, the proposed project site has been previously disturbed and no information regarding the presence of known tribal cultural resources has been provided to the DTSC from the contacted tribes or from cultural resource surveys or records. However, it is possible that previously unrecorded tribal resources may be present. Impacts would be less than significant with implementation of MM CUL-1 through MM CUL-3 (Section 3.5.3).

3.19 Utilities and Service Systems

Table 3-19. Utilities and Service Systems Checklist

Would the project:	**Potentially Significant Impact**	**Less-Than-Significant with Mitigation Incorporated**	**Less-Than-Significant Impact**	**No Impact**
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the waste water treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

3.19.1 Setting

All active utilities would be disconnected, and the overhead power and telephone lines would be removed prior to the building demolition. Therefore, no rerouting or relocation of utilities would be required during remediation. The project site would, however, have subsurface utility infrastructure that would be removed when the site is prepped for excavation. Power poles that may remain following demolition would be protected in place according to the utility owners' specifications. Onsite utilities to be removed include the following: a sanitary sewer line, a sanitary vault, a storm sewer pipeline, a storm drain inlet, storm sumps, gas feeder lines, and potential unidentified utility lines.

No new permanent utility infrastructure would be constructed; however, short-term utility connections would be needed for temporary construction facilities like an office trailer with power, lighting, telephones, and fiber-optic cable. The office trailer would require a temporary power drop from one of the remaining overhead power lines adjacent to the site. Port-o-potties would be used as sanitation facilities for onsite workers.

3.19.2 Impact Analysis

a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

LESS-THAN-SIGNIFICANT IMPACT. The project would include removal of disconnected, relic utility infrastructure and a temporary power drop from one of the power lines adjacent to the site. Once construction is complete, the power drop and associated equipment would be removed, and the power lines returned to their original condition. Therefore, the project would not require or result in the relocation or construction of new or expanded water, wastewater, stormwater, power, natural gas, or telecommunications facilities, and potential impacts would be less than significant.

b) Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

LESS-THAN-SIGNIFICANT IMPACT. During construction, water would be required primarily for dust suppression and soil compaction (and potentially vehicle decontamination) and would likely come from Bakersfield's municipal water supply via a fire hydrant near the southeastern corner of the site. No post-construction water would be required. As discussed in Section 3.10.2(b), groundwater is Bakersfield's chief source of municipal water, and groundwater use must be consistent with the requirements of the Kern River Groundwater Sustainability Agency's management plan (KRGSA 2022).

The action subject to CEQA and analyzed in this Initial Study would not include construction of new homes, businesses, or other infrastructure that would require water from municipal or other sources. The potential for and type of future development on the former MGP property is unknown at this time and, as such, it would be speculative to consider the impacts from potential development on water supplies. Future onsite developments will be considered separate CEQA actions and will be subject to CEQA compliance prior to construction or implementation. Therefore, the project would not affect water supplies available during normal, dry, and multiple dry years, and the potential impacts from construction water use would be less than significant.

c) Would the project result in a determination by the waste water treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

NO IMPACT. The project would not affect wastewater treatment facilities. The discussion under Section 3.19.2(a) provides more information.

d) Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

LESS-THAN-SIGNIFICANT IMPACT. Waste Management facilities in Buttonwillow and McKittrick, California, or other locations selected by PG&E, would be selected by the contractor in accordance with federal, state, and local requirements. The approved facilities would provide adequate disposal space for the solid waste (soil, asphalt, and debris) associated with the project's 3-month excavation period. Construction debris would be appropriately disposed of in nearby landfills that have adequate capacity to accept the waste generated from construction. Following construction, the project would generate a minor amount of solid waste associated with the soil vapor probes. Therefore, the project would not generate solid waste in excess of applicable standards or local capacity or conflict with solid waste reduction goals, and potential impacts on landfills and other waste management facilities would be less than significant.

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

LESS-THAN-SIGNIFICANT IMPACT. Soil and other materials removed from the site during excavation would be managed and disposed of in accordance with federal, state, and local solid waste requirements. Therefore, the project would comply with applicable solid waste management and reduction statutes, and potential impacts would be less than significant.

3.20 Wildfire

Table 3-20. Wildfire Checklist

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as road, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

3.20.1 Setting

The site is located outside of the state responsibility area, is not in a local responsibility area fire hazard severity zone, and is about 10 miles west of the closest very high fire hazard severity zone (VHFHSZ) (CAL FIRE 2007a, 2007b, 2023).

3.20.2 Impact Analysis

a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

NO IMPACT. The site is unzoned for fire hazard severity and is 10 miles west of the closest VHFHSZ. Therefore, the project would not impair an adopted emergency response plan or emergency evacuation plan applicable in or near a state responsibility area or a VHFHSZ.

b) Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

NO IMPACT. The site is unzoned for fire hazard severity and is 10 miles west of the closest VHFHSZ. Therefore, the project would not exacerbate wildfire risks in or near a state responsibility area or a VHFHSZ.

c) Would the project require the installation or maintenance of associated infrastructure (such as road, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

NO IMPACT. The site is unzoned for fire hazard severity and is 10 miles west of the closest VHFHSZ. Therefore, the project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts on the environment in or near a state responsibility area or a VHFHSZ.

d) Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

NO IMPACT. The site is unzoned for fire hazard severity and is 10 miles west of the closest VHFHSZ. Therefore, the project would not expose people or structures to significant post-fire risks in or near a state responsibility area or a VHFHSZ.

3.21 Mandatory Findings of Significance

Table 3-21. Mandatory Findings of Significance Checklist

	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a 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.)	☐	☐	☒	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

a) **Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?**

LESS-THAN-SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED. As documented in Section 2, Environmental Determination, and discussed throughout Section 3, Evaluation of Environmental Impacts, the project would not result in potentially significant impacts on any of the environmental factors and, thus, would not substantially degrade the quality of the environment. As described in Section 3.4, Biological Resources, the BSA does not support native vegetation communities or suitable habitat for fish or wildlife species and supports only minimal suitable nesting habitat outside the project boundary for birds. Therefore, the project would not substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number of, or restrict the range of, a rare or endangered plant or animal. As discussed in Section 3.5, Cultural Resources, and Section 3.18, Tribal Cultural Resources, no historical resources, indigenous archaeological sites, or TCRs have been identified in the API. Furthermore, MMs would be implemented to further minimize potential impacts on cultural resources. Therefore, the project would not eliminate important examples of the major periods of California history or prehistory, and the potential impacts would be less than significant with mitigation.

b) **Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a 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.)**

LESS-THAN-SIGNIFICANT IMPACT. In addition to the project-specific impacts described throughout Section 3, Evaluation of Environmental Impacts, this Initial Study considered the project's potential for incremental effects that would be cumulatively considerable. To this end, past, present, and future projects in proximity to the project were also considered. The purpose of the project is to remove soil from the project site that was contaminated during past onsite projects, particularly former MGP and automotive-related operations. Removal of contaminated soils would allow the former MGP property to be redeveloped for commercial or residential purposes at some point in the future, which would be consistent with redevelopment efforts currently ongoing in the project area. The fenced, vacant asphalt lot with some demolition debris would become a fenced, vacant gravel lot, and the project would not result in potentially significant impacts on any of the environmental factors.

As for future projects, the potential for and type of future development on the former MGP property is unknown at this time. Therefore, it would be speculative to consider potential future projects as contributing to future cumulatively considerable impacts in the project area. Future onsite developments will be considered separate CEQA actions and will be subject to CEQA compliance prior to construction or implementation. Therefore, any incremental impacts from the project would not be cumulatively considerable, and overall cumulative impacts would be less than significant.

c) **Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?**

LESS-THAN-SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED. The project has been designed to include BMPs and MMs that would minimize potential impacts. As indicated throughout this Initial Study, the project would not result in potentially significant impacts on any of the environmental factors. Therefore, the project would not result in impacts that would cause substantial adverse effects on human beings, either directly or indirectly.

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Appendix A
Biological Resources
Technical Memorandum

Appendix B
Construction Emission Calculations

Table B-1. Construction Information

Construction Activity	Description	Phase Start and End	Working Days	Off-road Equipment		
				Equipment	Quantity/ Day	Hours/ Day
Activity/Phase 1	Excavation and loadout	4/1/2025 - 6/30/2025	65	CAT 338 excavator	1	8
				JD80 excavator	1	5
				JD544 loader	1	8
				Skidsteer loader	1	4
Activity/Phase 2	Import and backfill	7/1/2025 - 7/31/2025	23	JD544 loader	1	8
				D5 bulldozer	1	8
				Skidsteer loader	1	4
				Sheepsfoot single-drum roller	1	8

Table B-2. On-road Vehicle Trips for Construction

Construction Activity	Vehicle Type	One-way Trips	Trip Length (miles/one-way trip)	Working Days	Paved Road (% of trip)
Activity/Phase 1 (excavation and loadout)	Worker	20	17.3	65	100.0
	Vendor	0	10.6	65	100.0
	Haul truck	26	19.6	65	99.5
	Onsite truck	1	17	65	90.0
Activity/Phase 2 (import and backfill)	Worker	20	17.3	23	100.0
	Vendor	0	10.6	23	100.0
	Haul truck	32	30	23	99.5
	Onsite truck	1	2	23	90.0

Number of one-way trips for haul trucks and trip length were calculated by combining the information of concrete trucks and end-dump trucks in Table B-4.

Table B-3. Earthwork Information

Construction Activity	Disturbed Area (acres)	Graded Area (acres)	Soil Excavated (cy)	Soil Exported (cy)	Soil Imported (cy)
Activity/Phase 1 (excavation and loadout)	0.79	0.00	5,832	5,832	0
Activity/Phase 2 (import and backfill)	0.79	0.78	0	0	4,860

cy = cubic yard(s)

Table B-4. Raw Construction Data

Construction Activity	Vehicle Type	Round Trips/Day	One-way Trips/Day	Days
Activity/Phase 1 (excavation and loadout)	Worker (commute)	10	20	64
	Concrete truck	2	4	22
	End-dump (California hazardous materials)	4	8	5
	End-dump (non-hazardous materials)	7	14	50
Activity/Phase 2 (import and backfill)	Worker (commute)	10	20	22
	End-dump (import)	16	32	22

Table B-5. Average Heavy-Heavy Duty Truck One-way Trip Activity/Phase 1

Total Trips	1,532
Average Daily Trips	17

CalEEMod Modeling Results - Construction and Operation Emissions

Table B-6. Construction Annual Emissions

Year/ Threshold Determination	ROG (tons/yr)	NO_x (tons/yr)	CO (tons/yr)	SO_2 (tons/yr)	Fugitive PM_{10} (tons/yr)	Exhaust PM_{10} (tons/yr)	PM_{10} Total (tons/yr)	Fugitive $PM_{2.5}$ (tons/yr)	Exhaust $PM_{2.5}$ (tons/yr)	$PM_{2.5}$ Total (tons/yr)	CO_2e (MT/yr)
2025	0.03	0.35	0.34	<0.005	0.35	0.01	0.36	0.05	0.01	0.06	142
Threshold	10.00	10.00	100.00	27.000	NA	NA	15.00	NA	NA	15.00	NA
Exceeds Threshold	No	No	No	Yes	NA	NA	No	NA	NA	No	NA

CO = carbon monoxide
CO_2e = carbon dioxide equivalent
MT/yr = million tons per year
NA = not applicable
NO_x = nitrogen oxides
PM_{10} = particulate matter with particles 10 micrometers in size
$PM_{2.5}$ = particulate matter with particles 2.5 micrometers in size
ROG = reactive organic gas
SO_2 = sulfur dioxide
tons/yr = ton(s) per year

Table B-7. Construction Daily Emissions

Emission Type / Threshold Determination	ROG (lb/day)	NO_x (lb/day)	CO (lb/day)	SO_2 (lb/day)	Fugitive PM_{10} (lb/day)	Exhaust PM_{10} (lb/day)	PM_{10} Total (lb/day)	Fugitive $PM_{2.5}$ (lb/day)	Exhaust $PM_{2.5}$ (lb/day)	$PM_{2.5}$ Total (lb/day)
Maximum Daily Emission	1.38	15.20	13.40	0.04	12.20	0.56	12.80	0.52	2.47	2.98
Threshold	100.00	100.00	100.00	100.00	NA	NA	100.00	NA	NA	100.00
Exceeds Threshold	No	No	No	No	No	No	No	No	No	No

CO = carbon monoxide
CO_2e = carbon dioxide equivalent
lb/day = pound(s) per day
NA = not applicable
NO_x = nitrogen oxides
PM_{10} = particulate matter with particles 10 micrometers or smaller in size
$PM_{2.5}$ = particulate matter with particles 2.5 micrometers or smaller in size
ROG = reactive organic gas
SO_2 = sulfur dioxide

Table B-8. Operations Annual Emissions

Year / Threshold Determination	ROG (tons/yr)	NO_x (tons/yr)	CO (tons/yr)	SO_2 (tons/yr)	Fugitive PM_{10} (tons/yr)	Exhaust PM_{10} (tons/yr)	PM_{10} Total (tons/yr)	Fugitive $PM_{2.5}$ (tons/yr)	Exhaust $PM_{2.5}$ (tons/yr)	$PM_{2.5}$ Total (tons/yr)	CO_2e (MT/yr)
2025	negligible	negligible	negligible	negligible	negligible	negligible	negligible	negligible	negligible	negligible	negligible
Threshold	10	10	100	27	NA	NA	15	NA	NA	15	NA
Exceeds Threshold	No	No	No	No	NA	NA	No	NA	NA	No	NA

CO = carbon monoxide
CO_2e = carbon dioxide equivalent
MT/yr = million tons per year
NA = not applicable
NO_x = nitrogen oxides
PM_{10} = particulate matter with particles 10 micrometers in size
$PM_{2.5}$ = particulate matter with particles 2.5 micrometers in size
ROG = reactive organic gas
SO_2 = sulfur dioxide
tons/yr = ton(s) per year

Appendix C
Noise Methodology
Technical Memorandum