INITIAL STUDY AND
MITIGATED NEGATIVE DECLARATION

INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

VISTA CONTINUATION HIGH SCHOOL MODERNIZATION PROJECT

DECEMBER 2025

INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION

VISTA CONTINUATION HIGH SCHOOL MODERNIZATION PROJECT

Prepared for:

Kern High School District
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Project #250128.01

NOTICE OF PUBLIC HEARING AND INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION

This is to advise that the Kern High School District (District) has prepared a Mitigated Negative Declaration for the Project identified below, which is scheduled to be presented at the Kern High School District – Board of Trustees meeting on February 2, 2026.

PLEASE BE ADVISED that the Kern High School – Board of Trustees will consider adopting the Mitigated Negative Declaration at the Board's meeting to be held on February 2, 2026. Presentations will be made at approximately 7:00 pm. Action on items on the board agenda will occur after the presentations. The meeting will be held in the Board Room Building, Kern High School District, 5801 Sundale Avenue, Bakersfield, CA 93309.

Project Name

Vista Continuation High School Modernization

Project Location

200 P Street, south of 4th Street in Bakersfield, California

Project Description

The District proposes to update the existing Vista Continuation High School (VCHS or high school) campus to enhance the learning experience and offer new and modern amenities for the student population and faculty, as well as improve the overall use of the existing property. The Project proposes to demolish the existing buildings, internal access roads, parking lots, and courtyard to construct new buildings, outdoor recreational spaces, and relocate existing ballfields on the existing 15.5-acre Project site in Bakersfield, California. All proposed construction will occur on previously disturbed ground and developed campus grounds, and primary access will remain on P Street.

The student enrollment at VCHS was 210 students in 2024. While the Project will increase the student population to approximately 440 students and up to five additional staff, the increase in the student and faculty population will occur over time and not immediately after construction is complete. Based on the current student population, it is anticipated that approximately 53 percent of students will be bused to the school, while the remaining 47 percent will be driven and dropped off, will drive their own vehicles, or will walk to school each day.

The District is proposing the construction of four conventionally framed buildings for the following uses: (1) a gymnasium, (2) a multi-purpose and cafeteria building, (3) an administration building, and (4) a two-story classroom building with a library. Additionally, the Project will include a pre-fabricated field house/concessions building of approximately 1,334 square feet. The total combined building square footage is approximately 50,000 square feet. The Project also proposes a central outdoor courtyard, two outdoor basketball

courts, adequate parking for staff, visitors, and students, drop-off lanes, access and fire lanes, outdoor lighting, and the relocation of three existing ballfields. The high school will incorporate the use of renewable solar energy generated by rooftop solar and/or solar panel-covered parking to offset the school's current energy demand.

Project Timeline

Construction of the Project would occur over a maximum of 12 to 18 months. It is anticipated that the following pieces of equipment would be used during construction activities:

- Roller
- Loaded trucks
- Excavator
- Generator
- Service truck
- Air compressor

The document(s) referenced in the Initial Study/Mitigated Negative Declaration are available for review between the hours of 7:30 a.m. and 4:30 p.m., Monday through Friday, at the Superintendent's Office, Kern High School District, located at 5801 Sundale Avenue, in Bakersfield, CA 93309.

As mandated by the California Environmental Quality Act (CEQA), the public review period for this document was 30 days (CEQA Section 15073[b]). The public review period began on December 8, 2025, and ended on January 5, 2026. For further information, please contact Jaymie Brauer at (661) 616-2600 or jaymie.brauer@qkinc.com.

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ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
ADMRT	Air Dispersion Modeling and Risk Assessment Tool
ADTs	average daily trips
APN	Assessor's Parcel Numbers
AQAP	air quality attainment plan
ATCM	Airborne Toxic Control Measure
bgs	below ground surface
BMPs	Best Management Practices
BRE	Biological Resources Evaluation
BSA	Biological Survey Area
CAA	Clean Air Act
CalEEMod	California Emissions Estimator Model
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CDE	California Department of Education
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CO2e	carbon dioxide equivalents
CWA	Clean Water Act
dB	decibel
DPM	Diesel Particulate Matter
DSA	Division of the State Architect
DWR	Department of Water Resources
EI	Expansion Index
EOP	Emergency Operations Plan
EPA	Environmental Protection Agency
FEIR	Final Environmental Impact Report
FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transit Administration
GAMAQI	Guidance for Assessing and Mitigating Air Quality Impacts
GHG	greenhouse gas
GSA	Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
HAPs	Hazardous Air Pollutants
HARP	Hotspots Analysis and Reporting Program
HI	hazard index
HMBP	Hazardous Materials Business Plan
IS	Initial Study

ITP	Incidental Take Permit
KCWA	Kern County Water Agency
KRGSA	Kings River Groundwater Sustainability Agency
LRA	Local Responsibility Area
MBGP	Metropolitan Bakersfield General Plan
MDB&M	Mount Diablo Base and Meridian
MJHMP	Multi-Jurisdictional Hazard Mitigation Plan
MM	Mitigation Measure
MMRP	Mitigation Monitoring and Reporting Program
MND	Mitigated Negative Declaration
mph	miles per hour
MRZs	Mineral Resource Zones
NAHC	Native American Heritage Commission
NHD	National Hydrography Dataset
NOx	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
NWI	National Wetlands Inventory
OEHHA	Office of Environmental Health Hazard Assessment
OPR	Office of Planning and Research
PG&E	Pacific Gas and Electric Company
PM10	particulate matter less than 10 microns
PM2.5	particulate matter less than 2.5 microns
PMI	point of maximum impact
PPV	peak particle velocity
PRC	Public Resources Code
ROG	reactive organic gases
SGMA	Sustainable Groundwater Management Act
SJKF	San Joaquin kit fox
SJVAB	San Joaquin Valley Air Basin
SJVAPCD	San Joaquin Valley Air Pollution Control District
SM	Silty Sands
SP	Poorly Graded Sands
SPAL	Small Project Analysis Level
SR	State Route
SRA	State Responsibility Area
SWPPP	Stormwater Pollution Prevention Plan
TA	Technical Advisory
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
USGS	U.S. Geological Survey
VCHS	Vista Continuation High School
WUI	Wildland Urban Interface

MITIGATED NEGATIVE DECLARATION

As Lead Agency under the California Environmental Quality Act (CEQA), the Kern High School District (KHSD) reviewed the Project described below to determine whether it could have a significant effect on the environment because of its development. In accordance with CEQA Guidelines Section 15382, "[s]ignificant effect on the environment" means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the Project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance.

Project Name

Vista Continuation High School Modernization Project

Project Location

200 P Street, south of 4th Street in Bakersfield, California

Project Description

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incorporate the use of renewable solar energy generated by rooftop solar and/or solar panel-covered parking to offset the school's current energy demand.

Project Timeline

Construction of the Project would start in Q3 2026 over a maximum of 12 to 18 months. It is anticipated that the following pieces of equipment would be used during construction activities:

- Roller
- Loaded trucks
- Excavator
- Generator
- Service truck
- Air compressor

Mailing Address and Phone Number of Contact Person

Jaymie Brauer, Principal Planner
QK
5080 California Avenue, Suite 220
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(661) 616-2600

Findings

As Lead Agency, the KHSD finds that the Project will not have a significant effect on the environment. The Environmental Checklist (CEQA Guidelines Appendix G) or Initial Study (IS) (see *Section 3 - Environmental Checklist*) identified one or more potentially significant effects on the environment, but revisions to the Project have been made before the release of this Mitigated Negative Declaration (MND) or mitigation measures would be implemented that reduce all potentially significant impacts to less-than-significant levels. The Lead Agency further finds that there is no substantial evidence that this Project would have a significant effect on the environment.

Mitigation Measures Included in the Project to Avoid Potentially Significant Effects

MM BIO-1: Within 14 days prior to the start of Project ground-disturbing activities, a pre-construction survey shall be conducted by a qualified biologist knowledgeable in the identification of these species. Surveys for active, known, potential, and natal San Joaquin kit fox dens within and adjacent to the Project site will be conducted following the United States Fish and Wildlife Service's (USFWS) "Standardized recommendations for protection of the San Joaquin kit fox prior to or during ground disturbance" (2011). Surveys for active western burrowing owl burrows within and adjacent to the Project Area will be conducted following the CDFG's "Staff Report on Burrowing Owl Mitigation" (2012). If no special-status species

or their sign (tracks, scat, etc.) are observed during the survey, no further action is required. A copy of the pre-construction survey report shall be submitted to the lead agency prior to the start of construction.

If, during construction activities, a live burrowing owl, American badger, or San Joaquin kit fox is encountered, all construction activity shall stop in the affected area until the animal leaves of its own volition. The special-status species shall be avoided by construction activities and construction workers, and allowed to leave the Project site without harassment.

MM BIO-2: If dens/burrows that could support any of these species are discovered during the pre-construction survey (BIO-1), the avoidance buffers outlined below shall be established. No work would occur within these buffers unless the biologist approves and monitors the activity.

San Joaquin Kit Fox
- Potential or Atypical den – 50 feet
- Known den – 100 feet
- Natal or pupping den – 500 feet, unless otherwise specified by CDFW

Western Burrowing Owl (active burrows)
- April 1-August 15
  - Low disturbance – 200 m
  - Medium disturbance– 500 m
  - High disturbance – 500 m
- August 16-October 15
  - Low disturbance – 200 m
  - Medium disturbance – 200 m
  - High disturbance – 500 m
- October 16-March 31
  - Low disturbance – 50 m
  - Medium disturbance – 100 m
  - High disturbance – 500m

American Badger/San Joaquin kit fox
- Potential or Atypical den – 50 feet
- Known den – 100-feet
- Natal or pupping den – 500 feet, unless otherwise specified by CDFW.

If any of these species are found within these recommended buffers and avoidance is not possible, consultation with CDFW shall be initiated. CDFW may allow burrow exclusion by a qualified biologist and only during the non-breeding season, before breeding behavior is exhibited, and after the burrow is confirmed empty through non-invasive methods, such as

surveillance. An ITP may be required by CDFW prior to any exclusion activity being completed.

MM BIO-3: A qualified biologist shall remain on-call throughout the construction phase if a western burrowing owl, American badger, or San Joaquin kit fox occurs on the site during construction. If one of these species occurs on-site, work shall be halted in that area. The biologist shall be contacted immediately to determine whether biological monitoring or the implementation of avoidance buffers may be warranted.

MM BIO-4: A qualified biologist shall thoroughly inspect and monitor cargo containers for kit foxes and other animals before and during the removal of cargo containers.

MM BIO-5: The following avoidance and minimization measures shall be implemented during the construction of the Project to reduce the potential for impact from the Project. They are modified from the U.S. Fish and Wildlife Service Standardized Recommendations for Protection of the Endangered San Joaquin kit fox Prior to or During Ground Disturbance (USFWS 2011, Appendix E).

a. All food-related trash items such as wrappers, cans, bottles, and food scraps shall be disposed of in securely closed containers and removed at least once a week from the construction or Project Site.
b. Construction-related vehicle traffic shall be restricted to established roads and predetermined ingress and egress corridors, staging, and parking areas. Vehicle speeds shall not exceed 20 miles per hour (mph) within the Project Site.
c. A Worker Environmental Awareness Training Program shall be prepared and presented to all workers who will be on-site during construction activities
d. To prevent inadvertent entrapment of kit fox or other animals during construction, the contractor shall cover all excavated, steep-walled holes or trenches more than two feet deep at the close of each workday with plywood or similar materials. If holes or trenches cannot be covered, one or more escape ramps constructed of earthen fill or wooden planks shall be installed in the trench. Before such holes or trenches are filled, the contractor shall thoroughly inspect them for entrapped animals. All construction-related pipes, culverts, or similar structures with a diameter of four inches or greater that are stored on the Project Site shall be thoroughly inspected for wildlife before the pipe is subsequently buried, capped, or otherwise used or moved in any way. If at any time an entrapped or injured kit fox is discovered, work in the immediate area shall be temporarily halted, and USFWS and CDFW shall be consulted.
e. Kit foxes are attracted to den-like structures such as pipes and may enter stored pipes and become trapped or injured. All construction pipes, culverts, or similar structures with a diameter of four inches or greater that are stored at a construction site for one or more overnight periods shall be thoroughly inspected for kit foxes before the pipe is subsequently buried, capped, or otherwise used or moved in any way. If a kit fox is discovered inside a pipe, that section of pipe shall not be moved until the USFWS and CDFW have been consulted. If necessary, and under the direct supervision of the biologist, the pipe may be moved only once to remove it from the path of construction activity until the fox has escaped.

f. No pets, such as dogs or cats, shall be permitted on the Project sites to prevent harassment, mortality of kit foxes, or destruction of dens.
g. Use of anti-coagulant rodenticides and herbicides in Project sites shall be restricted. This is necessary to prevent primary or secondary poisoning of kit foxes and the depletion of prey populations on which they depend. All uses of such compounds shall observe label and other restrictions mandated by the U.S. Environmental Protection Agency, California Department of Food and Agriculture, and other State and federal legislation, as well as additional Project-related restrictions deemed necessary by the USFWS and CDFW. If rodent control must be conducted, zinc phosphide shall be used because of the proven lower risk to kit foxes.
h. A representative shall be appointed by the Project proponent who will be the contact source for any employee or contractor who might inadvertently kill or injure a kit fox or who finds a dead, injured, or entrapped kit fox. The representative shall be identified during the employee education program, and their name and telephone number shall be provided to the USFWS.
i. The Sacramento Fish and Wildlife Office of USFWS and CDFW shall be notified in writing within three working days of the accidental death or injury to a San Joaquin kit fox during Project-related activities. Notification must include the date, time, and location of the incident or of the finding of a dead or injured animal and any other pertinent information. The USFWS contact is the Chief of the Division of Endangered Species, at the addresses and telephone numbers below. The CDFW contact can be reached at (559) 243-4014 and R4CESA@wildlifeca.gov.
j. All sightings of the San Joaquin kit fox shall be reported to the CNDDB. A copy of the reporting form and a topographic map clearly marked with the location of where the kit fox was observed shall also be provided to the Service at the address below.
k. Any Project-related information required by the USFWS or questions concerning the above conditions, or their implementation may be directed in writing to the U.S. Fish and Wildlife Service at: Endangered Species Division, 2800 Cottage Way, Suite W 2605, Sacramento, California 95825-1846, phone: (916) 414-6620 or (916) 414-6600.

MM BIO-6: If Project construction activities must occur during the Swainson's hawk nesting season (February 15 to August 31), pre-construction activity surveys shall be conducted for Swainson's hawk nests in accordance with the Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley, Swainson's Hawk Technical Advisory Committee (CDFG, 2000). The timing and the number of phases of surveys can be adjusted based on the timing of the construction schedule. The surveys may be phased to coincide with active construction areas, plus a 0.5-mile buffer of those areas. The buffers, at the qualified biologist's discretion, may be altered based upon site conditions. If no active nests are observed during the surveys, no additional action is required.

MM BIO-7: If an active Swainson's hawk nest is discovered at any time within 0.5 miles of active construction, a qualified biologist shall complete an assessment of the potential for current construction activities to impact the nest. The assessment would consider the type of construction activities, the location of construction relative to the nest, the visibility of

construction activities from the nest location, and other existing disturbances in the area that are not related to the construction activities of this Project. Based on this assessment, the biologist will determine if construction activities can proceed and the level of nest monitoring required. Construction activities shall not occur within 0.5 miles of an active nest, but depending upon conditions at the site, this distance may be reduced. Full-time monitoring to evaluate the effects of construction activities on nesting Swainson's hawks may be required. The qualified biologist shall have the authority to stop work if it is determined that the Project construction is disturbing the nest. These buffers may need to be increased depending on the sensitivity of the nesting Swainson's hawk to disturbances and at the discretion of the qualified biologist. No avoidance would be needed if construction occurs near a known Swainson's hawk nest outside of the Swainson's hawk nesting season.

MM BIO-8: If Project construction activities are initiated during the nesting season (February 1 to September 15), a preconstruction activity nesting bird survey shall be conducted within 14 days prior to the start of ground disturbance activities. The surveys shall encompass the Project site and a 250-foot buffer for songbirds and a 500-foot buffer for raptors.

The surveys may be phased with the construction of the Project. If no active nests are found, no further action is required. However, existing nests may become active and new nests may be built at any time prior to and throughout the nesting season, including when construction activities are in progress. Surveys for burrowing owl shall follow CDFW protocol.

If active nests are found during the survey or at any time during construction of the Project, an avoidance buffer ranging from 50 feet to 500 feet may be required, with the avoidance buffer from any specific nest being determined by a qualified biologist. The avoidance buffer will remain in place until the biologist has determined that the young are no longer reliant on the adults or the nest, or if breeding attempts have otherwise been unsuccessful. Work may occur within the avoidance buffer under the approval and guidance of the biologist, but full-time monitoring may be required. The biologist shall have the ability to stop construction if nesting adults show any sign of distress.

MM BIO-9: Prior to start of demolition, if impacts to San Joaquin kit fox cannot be avoided, the Project developer/contractor shall obtain and ITP from CDFW and follow all requirements, which could include, but not be limited to: the construction of artificial dens, purchasing compensation credits from an authorized mitigation and conservation bank, and/or purchasing additional land that is suitable for San Joaquin kit fox.

MM CUL-1: If prehistoric or historic-era cultural materials are encountered during construction activities, all work in the immediate vicinity of the find shall halt until a qualified archaeologist can evaluate the find and make recommendations. Cultural resource materials may include prehistoric resources such as flaked and ground stone tools and debris, shell, bone, ceramics, and fire-affected rock, as well as historic resources such as glass, metal, wood, brick, or structural remnants. If the qualified archaeologist determines that the discovery represents a potentially significant cultural resource, additional investigations may be required to mitigate adverse impacts from Project implementation.

These additional studies may include avoidance, testing, and evaluation, or data recovery excavation.

MM CUL-2: If human remains are discovered during construction or operational activities, further excavation or disturbance shall be prohibited pursuant to Section 7050.5 of the California Health and Safety Code. The specific protocol, guidelines, and channels of communication outlined by the Native American Heritage Commission, in accordance with Section 7050.5 of the Health and Safety Code, Section 5097.98 of the Public Resources Code (Chapter 1492, Statutes of 1982, Senate Bill 297), and Senate Bill 447 (Chapter 44, Statutes of 1987), shall be followed. Section 7050.5(c) shall guide the potential Native American involvement, in the event of discovery of human remains, at the direction of the county coroner.

MM GEO-1: If any paleontological resources are encountered during ground-disturbance activities, all work within 25 feet of the find shall halt until a qualified paleontologist, as defined by the Society of Vertebrate Paleontology Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources (2010), can evaluate the find and make recommendations regarding treatment. Paleontological resource materials may include resources such as fossils, plant impressions, or animal tracks preserved in rock. The qualified paleontologist shall contact the Natural History Museum of Los Angeles County or another appropriate facility regarding any discoveries of paleontological resources.

If the qualified paleontologist determines that the discovery represents a potentially significant paleontological resource, additional investigations and fossil recovery may be required to mitigate adverse impacts from Project implementation. If avoidance is not feasible, the paleontological resources shall be evaluated for their significance. If the resources are not significant, avoidance is not necessary. If the resources are significant, they shall be avoided to ensure no adverse effects, or such effects must be mitigated. Construction in that area shall not resume until the resource-appropriate measures are recommended or the materials are determined to be less than significant. If the resource is significant and fossil recovery is the identified form of treatment, then the fossil shall be deposited in an accredited and permanent scientific institution. Copies of all correspondence and reports shall be submitted to the Lead Agency.

MM HAZ-1: Prior to the start of the demolition of any existing structures on the Project site, an assessment of the existing buildings shall be performed by a certified asbestos consultant, notification shall be submitted to the San Joaquin Valley Air Pollution Control District, and any abatement requirements shall be completed in order to obtain an approved demolition permit.

SECTION 1 - INTRODUCTION

1.1 - Overview

The District is proposing to modernize the existing Vista Continuation High School (VCHS) campus (Project) within central Bakersfield, California. Figure 1-1 is a map of the regional location, and Figure 1-2 shows the Project area map. Figure 1-3 is the Project site plan.

1.2 - California Environmental Quality Act

The KHSD is the Lead Agency for this Project pursuant to the California Environmental Quality Act (CEQA) Guidelines (Public Resources Code (PRC) Section 15000 et seq.). The Environmental Checklist (CEQA Guidelines Appendix G) or Initial Study (IS) (see *Section 3 – Initial Study*) provides analysis that examines the potential environmental effects of the construction and operation of the Project. Section 15063 of the CEQA Guidelines requires the Lead Agency to prepare an IS to determine whether a discretionary Project will have a significant effect on the environment. A Mitigated Negative Declaration (MND) is appropriate when an IS has been prepared, and a determination can be made that no significant environmental effects will occur because revisions to the Project have been made or mitigation measures will be implemented that reduce all potentially significant impacts to less-than-significant levels. The content of an MND is the same as a Negative Declaration, with the addition of identified mitigation measures and a Mitigation Monitoring and Reporting Program (MMRP) (see *Section 6 – Mitigation Monitoring and Reporting Program*).

Based on the IS, the Lead Agency has determined that the environmental review for the proposed application can be completed with an MND.

1.3 - California Department of Education, School Siting Requirements

Education Code Section 17251 and the California Code of Regulations (CCR), Title 5, Sections 14001 through 14012, outline the powers and duties of the California Department of Education (CDE) regarding school sites and the construction of school buildings. Districts using local funds are encouraged to seek the CDE's approval for the benefits that such outside, objective reviews provide to the school district and the community.

Safety is the first consideration in the selection and/or construction of school sites. Certain health and safety requirements are governed by State regulations and the policies of the Department. When selecting new school sites, the selection team considers the following factors: (1) proximity to airports; (2) proximity to high-voltage power transmission lines; (3) presence of toxic and hazardous substances; (4) hazardous air emissions and facilities within a quarter mile; (5) other health hazards; (6) proximity to railroads; (7) proximity to high-pressure natural gas lines, gasoline lines, pressurized sewer lines, or high-pressure water pipelines; (8) proximity to propane tanks; (9) noise; (10) proximity to major roadways; (11) results of geological studies and soils analyses; (12) condition of traffic and school bus safety; (13) safe routes to school; and (14) safety issues for joint-use projects.

VCHS is an already developed high school. New construction would be subject to review and approval by the CDE. The following factors are analyzed in relevant Impact sections or, where a relevant impact section cannot be identified, those factors have been discussed below:

- **Proximity to airports** – analyzed in Impact #3.4.9e (Hazards and Hazardous Materials) and Impact #3.4.13c (Noise).
- **Proximity to high-voltage power transmission lines** – analyzed in Impact #3.4.20c (Wildfire).
- **Presence of toxic and hazardous substances** – analyzed in Impact #3.4.3c (Air Quality), Impact #3.4.9 (Hazards and Hazardous Materials).
- **Hazardous air emissions and facilities within a quarter mile** – analyzed in Impact #3.4.3c (Air Quality).
- **Other health hazards** – analyzed in Impact #3.4.9 (Hazards and Hazardous Materials).
- **Proximity to railroads** – analyzed in Impact #3.4.17a (Transportation).
- **Proximity to high-pressure natural gas lines, gasoline lines, pressurized sewer lines, or high-pressure water pipelines** – analyzed in Impact #3.4.20c (Wildfire).
- **Proximity to propane tanks –** Impact #3.4.9d (Hazards and Hazardous Materials).
- **Noise** – analyzed in Impact #3.4.13 (Noise).
- **Proximity to major roadways** – analyzed in Impact #3.4.17a (Transportation).
- **Results of geological studies and soils analyses** – analyzed in Impact #3.4.7 Geology and Soils.
- **Condition of traffic and school bus safety** – analyzed in Impact #3.4.17a (Transportation).
- **Safe routes to school** – analyzed in Impact #3.4.17a (Transportation).
- **Safety issues for joint-use projects** – The existing school site is not a joint-use project.

Impact Terminology

The following terminology is used to describe the level of significance of impacts.

- A finding of "no impact" is appropriate if the analysis concludes that the Project would not affect a topic area in any way.
- An impact is considered "less than significant" if the analysis concludes that it would cause no substantial adverse change to the environment and requires no mitigation.
- An impact is considered "less than significant with mitigation incorporated" if the analysis concludes that it would cause no substantial adverse change to the environment with the inclusion of environmental commitments that have been agreed to by the applicant.
- An impact is considered "potentially significant" if the analysis concludes that it could have a substantial adverse effect on the environment.

1.4 - Document Organization and Contents

The content and format of this IS/MND are designed to meet the requirements of CEQA. The report contains the following sections:

- *Section 1 – Introduction:* This section provides an overview of CEQA requirements, intended uses of the IS/MND, document organization, and a list of regulations that have been incorporated by reference.
- *Section 2– Project Description:* This section describes the Project and provides data on the site's location.
- *Section 3 – Initial Study:* This section contains the evaluation of 21 different environmental resource factors contained in Appendix G of the CEQA Guidelines. Each environmental resource factor is analyzed to determine whether the proposed Project would have an impact. One of four findings is made, which include: no impact, less-than-significant impact, less than significant with mitigation, or significant and unavoidable. If the evaluation results in a finding of significant and unavoidable impacts for any of the 21 environmental resource factors, then an Environmental Impact Report will be required.
- *Section 4 – Mitigation Monitoring and Reporting Program:* This section contains the Mitigation Monitoring and Reporting Program.
- *Section 5 – List of Preparers:* This section identifies the individuals who prepared the IS/MND Addendum.
- Section 6 – *References:* This section contains a full list of references that were used in the preparation of this IS/MND.

1.5 - Incorporated by Reference

The following documents and/or regulations are incorporated into this IS/MND by reference:

- California Department of Education, Title 5, California Code of Regulations.
- Metropolitan Bakersfield General Plan 2002
- Metropolitan Bakersfield General Plan Update Final PEIR
- Kern County Airport Land Use Compatibility Plan
- Kern County Emergency Operations Plan
- Kern High School District Emergency Operations Plan
- Kern High School District Comprehensive Safety Plan

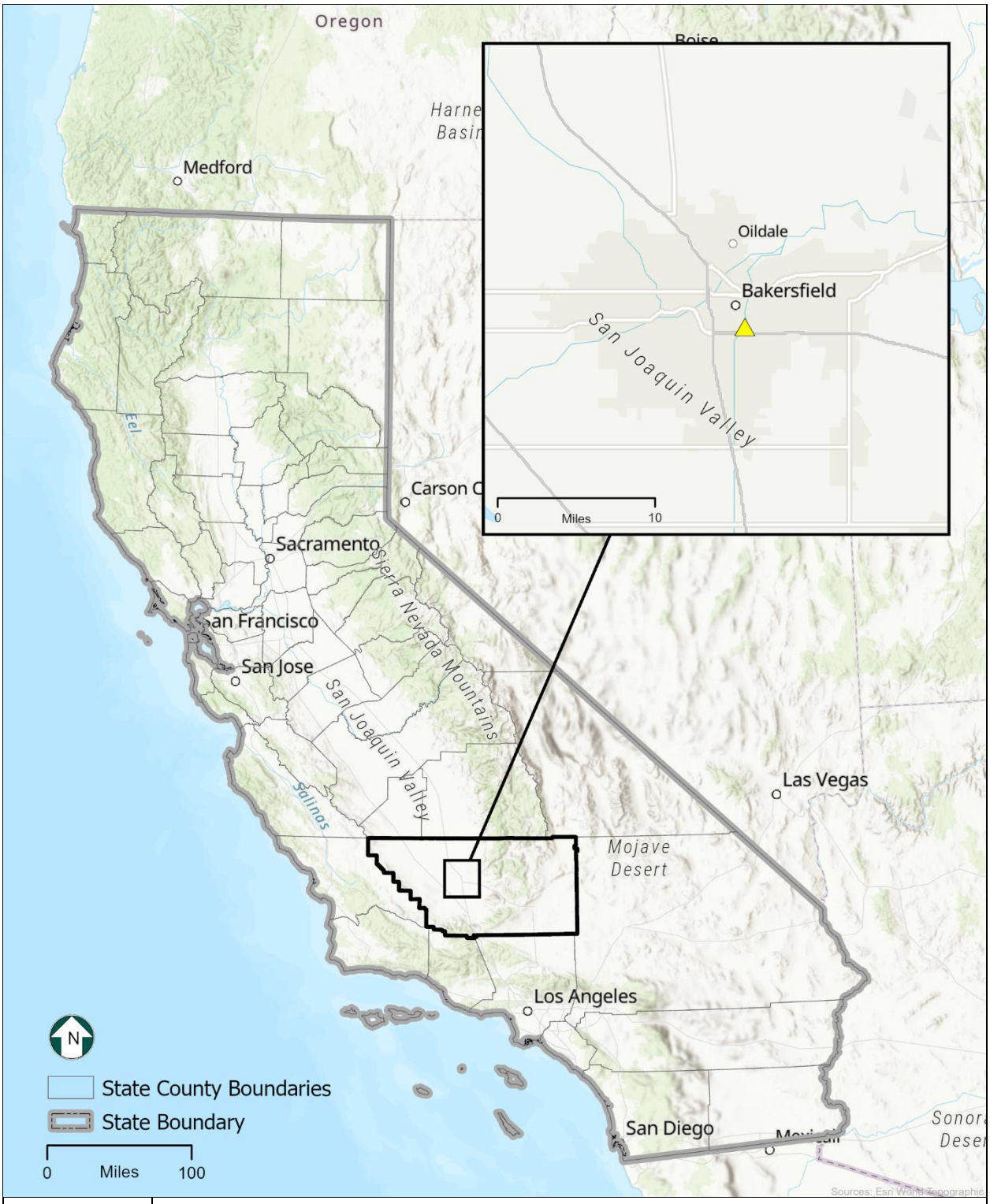

Figure 1-1
Regional Location

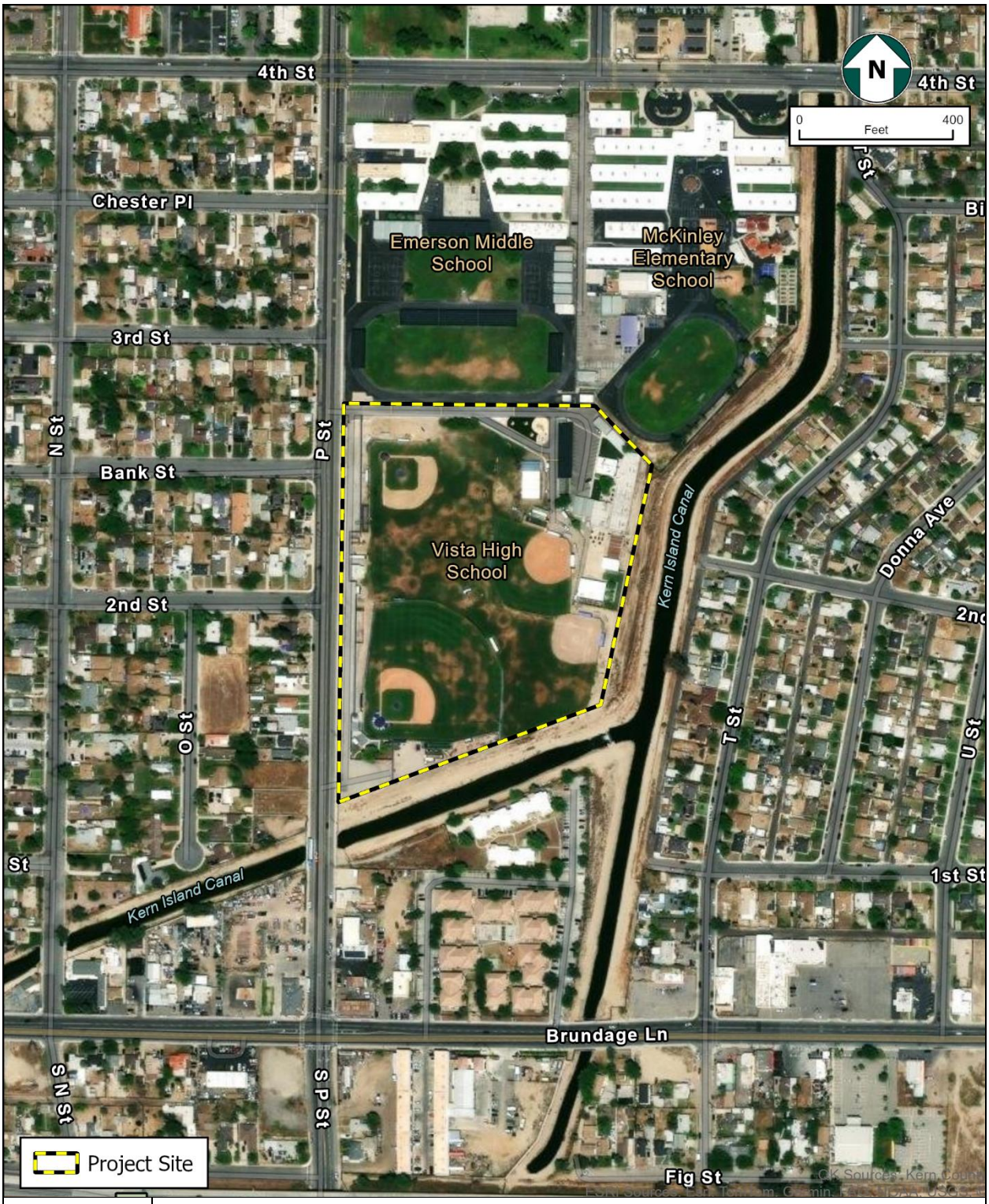

Figure 1-2
Project Area

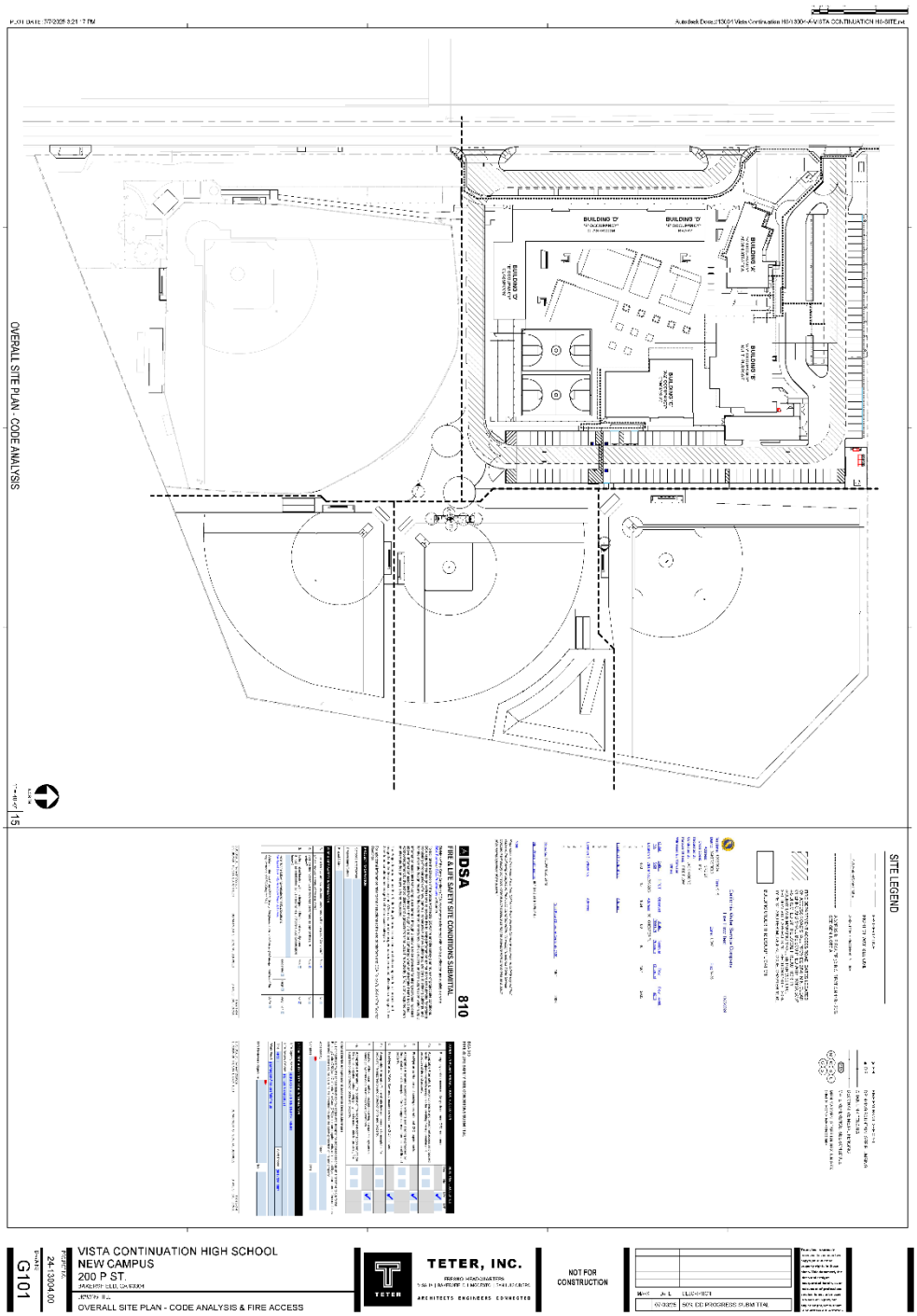

Figure 1-3
Project Site Plan

SECTION 2 - PROJECT DESCRIPTION

2.1 - Introduction

The District proposes to modernize the existing Vista Continuation High School (VCHS) campus (Project) within central Bakersfield, California. Figure 1-1 is a map of the regional location, and Figure 1-2 shows the Project area map. Figure 1-3 is the Project site plan.

2.2 - Project Location

VCHS is currently located at 200 P Street, located south of 4th Street. The Project site is located within Section 31, Township 29 South, Range 28 East, Mount Diablo Base and Meridian (MDB&M), within the Gosford U.S. Geological Survey (USGS) 7.5-minute topographic quadrangle. The site encompasses approximately a 15.5-acre portion of Assessor's Parcel Numbers (APN) 010-110-03. The Project site is located east of P Street and north of the Kern Island Canal (Figure 1-2).

2.3 - Project Environment

VCHS was developed and opened 58 years ago, in 1967 (Kern High School District, 2025). The existing school campus consists of a number of buildings, athletic fields, cargo containers, parking lots, etc. The surrounding area includes McKinley and Emerson Elementary Schools and medical services to the north, Kern Island Canal and single-family residential to the east, Kern Island Canal and multi-family to the south, and single-family residential to the west.

2.4 - Proposed Project

Kern High School District (District) proposes to update the existing VCHS campus to enhance the learning experience and offer new and modern amenities to the student population and faculty, as well as improve the overall use of the existing property. The Project proposes to demolish the existing buildings, internal access roads, parking lots, and courtyard to construct new buildings, outdoor recreational spaces, and relocate existing ballfields on the existing 15.5-acre Project site in Bakersfield, California. All proposed construction will occur on previously disturbed ground and developed campus grounds, and primary access will remain on P Street.

The student enrollment at VCHS was 210 students in 2024. While the Project will increase the student population to approximately 440 students and up to five additional staff, the increase in the student and faculty population will occur over time and not immediately after construction is complete. Based on the current student population, it is anticipated that approximately 53 percent of students will be bused to the school, while the remaining 47 percent will be driven and dropped off, will drive their own vehicles, or will walk to school each day.

The District is proposing the construction of four conventionally framed buildings for the following uses: (1) a gymnasium, (2) a multi-purpose and cafeteria building, (3) an administration building, and (4) a two-story classroom building with a library. Additionally, the Project will include a pre-fabricated field house/concessions building of approximately 1,334 square feet. The total combined building square footage is approximately 50,000 square feet. The Project also proposes a central outdoor courtyard, two outdoor basketball courts, adequate parking for staff, visitors, and students, drop-off lanes, access and fire lanes, outdoor lighting, and the relocation of three existing ballfields. The high school will incorporate the use of renewable solar energy generated by rooftop solar and/or solar panel-covered parking to offset the school's current energy demand.

Project Timeline

Construction of the Project would occur over a maximum of 12 to 18 months. It is anticipated that the following pieces of equipment would be used during construction activities:

- Roller
- Loaded trucks
- Excavator
- Generator
- Service truck
- Air compressor

SECTION 3 - INITIAL STUDY

3.1 - Environmental Checklist

1. **Project Title:**

   Vista Continuation High School Modernization Project

2. **Lead Agency Name and Address:**

   Kern High School District
   Facilities Planning
   801 South Mt. Vernon Avenue
   Bakersfield, CA 93307
   Randy Rowles, Director of Facilities
   (661) 396-4969

3. **Contact Person and Phone Number:**

   Jaymie Brauer, Principal Planner
   QK
   5080 California Avenue, Suite 220
   Bakersfield, CA 93309
   (661) 616-2600

4. **Project Location:**

   200 P Street, south of 4th Street in Bakersfield, California

5. **General Plan Designation:**

   Park and Recreation (OS-P) (Metropolitan Bakersfield General Plan)

6. **Zoning:**

   R-3 Medium Density Multi-Unit Dwelling (City of Bakersfield)

7. **Description of Project:**

   The District proposes to update the existing VCHS campus to enhance the learning experience and offer new and modern amenities for the student population and faculty, as well as improve the overall use of the existing property. The Project proposes to demolish the existing buildings, internal access roads, parking lots, and courtyard to construct new buildings, outdoor recreational spaces, and relocate existing ballfields on the existing 15.5-acre Project site in Bakersfield, California. All proposed construction will occur on previously disturbed ground and developed campus grounds, and primary access will remain on P Street.

The student enrollment at VCHS was 210 students in 2024. While the Project will increase the student population to approximately 440 students and up to five additional staff, the increase in the student and faculty population will occur over time and not immediately after construction is complete. Based on the current student population, it is anticipated that approximately 53 percent of students will be bused to the school, while the remaining 47 percent will be driven and dropped off, will drive their own vehicles, or will walk to school each day.

The District is proposing the construction of four conventionally framed buildings for the following uses: (1) a gymnasium, (2) a multi-purpose and cafeteria building, (3) an administration building, and (4) a two-story classroom building with a library. Additionally, the Project will include a pre-fabricated field house/concessions building of approximately 1,334 square feet. The total combined building square footage is approximately 50,000 square feet. The Project also proposes a central outdoor courtyard, two outdoor basketball courts, adequate parking for staff, visitors, and students, drop-off lanes, access and fire lanes, outdoor lighting, and the relocation of three existing ballfields. The high school will incorporate the use of renewable solar energy generated by rooftop solar and/or solar panel-covered parking to offset the school's current energy demand.

Project Timeline

Construction of the Project would occur over a maximum of 12 to 18 months. It is anticipated that the following pieces of equipment would be used during construction activities:

- Roller
- Loaded trucks
- Excavator
- Generator
- Service truck
- Air compressor

8. Surrounding Land Uses and Setting:

The campus is situated in a developed urban area within the City of Bakersfield. McKinley and Emerson Elementary Schools and medical services to the north, Kern Island Canal and single-family residential to the east, Kern Island Canal and multi-family to the south, and single-family residential to the west.

9. Other Public Agencies Whose Approval May Be Required:

- California Department of Education
- California Division of the State Architect
- California Department of Fish and Wildlife
- San Joaquin Valley Air Pollution Control District

- Central Valley Regional Water Quality Control Board

10. 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 the significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

    On August 1, 2025, pursuant to Public Resources Code section 21074 and subdivision (c) of Public Resources Code Section 5024.1, Assembly Bill (AB) 52, letters were sent to each of the Native American tribes within the geographic area as identified by the Native American Heritage Commission (NAHC) (see Appendix C). The letters included a Project description and location maps. Tribal consultation under AB 52 closed on August 31, 2025. Follow-up contact through direct phone calls was initiated on August 21, 2025. One response was provided over the phone from Curtis Alcantar, Cultural and Natural Resource Manager for the Tejon Indian Tribe, in which the Tribe declined consultation and communicated they would like to be contacted if cultural resources are identified. To date, no other Tribes have responded.

    NOTE: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and Project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See PRC Section 21083.3.2.) Information may also be available from the NAHC's Sacred Lands File per PRC Section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that PRC Section 21082.3(c) contains provisions specific to confidentiality.

3.2 - Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this Project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture and 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

3.3 - 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 (a) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (b) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENT 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 EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required.

Randall L. Rowles, PE	*12/5/2025*
Signature	Date
Randy Rowles, Director of Facilities	Kern High School District, Facilities Planning
Printed Name	For

3.4 - Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to Projects like the one involved (e.g., the Project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on Project-specific factors as well as general standards (e.g., the Project will not expose sensitive receptors to pollutants, based on a Project-specific screening analysis).

2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as Project-level, indirect as well as direct, and construction as well as operational impacts.

3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there is one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less-Than-Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less-than-significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).

5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

    a. Earlier Analysis Used. Identify and state where they are available for review.

    b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

    c. Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the Project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a Project's environmental effects in whatever format is selected.

9. The explanation of each issue should identify:

    a. the significance criteria or threshold, if any, used to evaluate each question; and

    b. the mitigation measure identified, if any, to reduce the impact to less than significance.

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
3.4.1 - AESTHETICS					
Would the Project:					
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 of 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 that would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

Discussion

Impact #3.4.1a – Would the Project have a substantial adverse effect on a scenic vista?

The Project site is located on flat previously disturbed land, surrounded by elementary schools to the north, the Kern Island Canal to the south, and single-family residential neighborhoods to the east and west. The District proposes to modernize the existing VCHS campus. The Metropolitan Bakersfield General Plan Final Environmental Impact Report (FEIR) notes that the scenic vantage points in Bakersfield are along State Route (SR) 178 and Alfred Harrell Highway (City of Bakersfield and County of Kern, 2002). The Project site is located approximately 1.5 miles from SR 178 and approximately eight miles from the Alfred Harrell Highway. More so, there are no State highways within Metropolitan Bakersfield that are designated as State Designated or Eligible State Scenic Highways (Caltrans, 2025). Therefore, the Project, as proposed, would have no impact on scenic vistas.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be *no impact.*

Impact #3.4.1b – Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?

The General Plan FEIR discusses that the foothills, the Kern River, canals, and areas along SR 178 are the main scenic resources in Bakersfield. Although the Project site is directly north of the Kern Island Canal, this portion of the canal is not accessible to pedestrians, and the site is not in close proximity to SR 178. The proposed reconfigurations of the site would allow visitors, students, or staff to enjoy the views of the canal.

The Project proposes to remove several trees in order to reconfigure the site, but the majority of trees will remain in place. The Project site does not contain rock outcroppings, historic buildings, or lie within or near a State scenic highway, as discussed in Impact #3.4.1a. Therefore, the Project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be *no impact.*

Impact #3.4.1c – Would the Project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?

Considering the Project will modernize an existing high school campus, it will largely have similar aesthetic qualities seen on an existing campus (buildings, classrooms, parking areas, ball fields, walkways, etc.), and the Project's appearance would not substantially change or degrade the visual character of the site. The Project does not conflict with zoning or other regulations regarding aesthetics. Therefore, the Project would not result in a substantial impact to the visual quality of the area.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be *no impact.*

Impact #3.4.1d – Would the Project create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?

Construction of the proposed Project would generally occur during daytime hours, typically from 7:00 a.m. to 6:00 p.m. All lighting would be directed downward and shielded to focus illumination on the desired work areas only and prevent light spillage onto adjacent properties. Because lighting used to illuminate work areas would be shielded, focused downward, and turned off by 6:00 p.m., the potential for lighting to affect any residents adversely is minimal. Increased truck traffic and the transport of construction materials to the Project site would temporarily increase glare conditions during construction. However, this increase in glare would be minimal and temporary. Construction activity would focus on specific areas on the sites, and any sources of glare would not be stationary for a prolonged period of time. Therefore, construction of the proposed Project would not create a new source of substantial glare that would affect daytime views in the area.

Exterior lighting is typically regulated throughout California by the local municipal code and the State energy and building codes. However, special circumstances regarding the development of school facilities fall under the jurisdiction of the California Department of Education (CDE) and the Division of the State Architect (DSA). Title 5 CCR consists of regulations that control school facility construction throughout the State. Specifically, Article 4 provides standards for the development of plans for the design and construction of school facilities. For operations, exterior lighting would comply with CCR Title 5 § 14030 (Standards for Development of Plans for the Design and Construction of School Facilities), which regulates both indoor and outdoor lighting standards for the construction of schools. Such provisions include lights that do not produce glare and window treatment that allows entrance of daylight but does not cause excessive glare. Given that the Project is required to adhere to the California Education Code, there will be no new sources of substantial light or glare that would adversely affect day or nighttime views in the area.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be ***no impact.***

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact

3.4.2 - AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the State's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the Project:

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 by 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?	☐	☐	☐	☒

Discussion

Impact #3.4.2a – 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?

The Farmland Mapping and Monitoring Program (FMMP) designation of the Project site is listed as Urban and Built-up Land (California Department of Conservation, 2022). Therefore, there would be no impact on Farmland related to the development of the Project.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be ***no impact.***

Impact #3.4.2b – Would the Project conflict with existing zoning for agricultural use or a Williamson Act Contract?

See discussion of Impact #3.4.2a above. The Project site is not subject to a Williamson Act land use contract, according to data available from the California Department of Conservation and is not zoned for agricultural use. Therefore, the construction of the Project would not result in a conflict with existing zoning for agricultural use or a Williamson Act contract, and there would be no impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be ***no impact***.

Impact #3.4.2c – 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))?

The Public Resources Code (PRC) Section 12220(g) and Section 4526 defines "Forest land" as land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions and that allows for the management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. Timberland, pursuant to PRC 4526, is land other than land owned by the federal government and land designated as experimental forest land, which is available for and capable of growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees.

There are no forest lands or timberlands identified on the Project site or within its vicinity. The Project would not result in the loss or conversion of forest land to a non-forest use. Therefore, there would be no impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be *no impact*.

Impact #3.4.2d – Would the Project result in the loss of forest land or conversion of forest land to non-forest use?

See discussion of Impact #3.4.2c above.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be *no impact*.

Impact #3.4.2e – Would the Project 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?

See discussion of Impacts #3.4.2a, #3.4.2b, and #3.4.2c above.

Surrounding land uses in close proximity to the Project site are developed with single-family and multi-family residential, and school uses. The Project would not involve changes in the existing environment that could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be *no impact*.

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact

3.4.3 - AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the Project:

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?	☐	☐	☒	☐

Discussion

The analyses in this section are based on a Small Project Analysis Level (SPAL) prepared for this Project (QK, 2025a), attached as Appendix A.

Impact #3.4.3a – Would the Project Conflict with or obstruct implementation of the applicable air quality plan?

The City is located in the San Joaquin Valley Air Basin (SJVAB) and under the jurisdiction of the San Joaquin Valley Air Pollution Control District (SJVAPCD). The surrounding topography includes foothills and mountains to the east and west that direct air circulation and dispersion patterns. Temperature inversions can trap air within the Valley, thereby preventing the vertical dispersal of air pollutants. In addition to topographic conditions, the local climate can also contribute to air quality problems. The climate is characterized by hot, dry summers and cool winters with the notable presence of Tule fog.

Plan Consistency

The CEQA Guidelines indicate that a significant impact would occur if the proposed Project would conflict with or obstruct implementation of the applicable air quality plan. The SJVAB is designated nonattainment of State and federal health-based air quality standards for

ozone and particulate matter less than 2.5 microns (PM2.5). The SJVAB is designated attainment for federal particulate matter less than 10 microns (PM10) standards and nonattainment of State PM10. To meet federal Clean Air Act (CAA) requirements, the SJVAPCD has multiple air quality attainment plan (AQAP) documents, including:

Particulate Matter Plans:

- 2003 PM10 Plan
- 2006 PM10 Plan
- 2008 PM2.5 Plan
- 2012 PM2.5 Plan
- 2015 Plan for the 1997 PM2.5 Standard
- 2016 Moderate Area Plan for the 2012 PM2.5 Standard
- 2018 PM2.5 Plan for the San Joaquin Valley
- 2024 Plan for the 2012 PM2.5 Standard

Ozone Plans:

- 2004 Extreme Ozone Attainment Demonstration Plan
- 2007 Plan for the 1997 8-Hour Ozone Standard
- 2013 Plan for the Revoked 1-Hour Ozone Standard
- 1-Hour Ozone Attainment Request
- 2016 Plan for the 2008 8-Hour Ozone Standard
- 2022 Ozone Plan for the San Joaquin Valley

Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI)

The California Environmental Quality Act (CEQA) requires environmental impacts of a proposed project to be identified, assessed, and avoided or mitigated as feasible, if these impacts are significant (San Joaquin Valley Air Pollution Control District, 2015). The Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI) provides technical guidance for the review of air quality impacts from proposed projects within the boundaries of the San Joaquin Valley Unified Air Pollution Control District. The guide provides District staff uniform procedures for assessing potential air quality impacts of proposed projects and for preparing the air quality section of environmental documents.

Small Project Analysis Level (SPAL)

SJVAPCD created the SPAL screening tool to streamline air quality assessments of commonly encountered projects (QK, 2025a). When a project falls under the SPAL, the Lead Agency should use the information in the initial study checklist to justify a finding of less-than-significant air quality impacts (San Joaquin Valley Air Pollution Control District, 2015). According to SJVAPCD's GAMAQI, the SJVAPCD "pre-calculated the emissions on a large number and types of projects to identify the level at which they have no possibility of exceeding the emissions thresholds".

The SJVAPCD SPAL process established review parameters to determine whether a project qualifies as a "small project." A project that is found to be "less than" the established parameters has "no possibility of exceeding criteria pollutant emissions thresholds." Table 3.4.3-1 presents the SPAL size parameters for educational projects.

Table 3.4.3-1
Small Project Analysis Level in Units for Educational Projects

Land Use Category - Educational	Project Size*	Unit	ADT One-Way for all Fleet Types (except HHDT)	ADT One-Way for HHDT Trips Only
Elementary School	1,880	Student	1,000	15
Elementary School	156,000	Square Feet	1,000	15
Junior High School	1,440	Student	1,000	15
Junior High School	168,800	Square Feet	1,000	15
High School	1,160	Student	1,000	15
High School	153,600	Square Feet	1,000	15
Junior College (2 year)	1,720	Student	1,000	15
Junior College (2 year)	74,400	Square Feet	1,000	15
University/College (4 year)	1,120	Student	1,000	15
Library	38,400	Square Feet	1,000	15
Place of Worship	141,000	Square Feet	1,000	15
Day Care Center	40,000	Square Feet	1,500	25
Proposed Project	**50,000**	**Square Feet**	**704**	**0****

Source: Appendix A
*Project size based on SPAL Table 5, as posted on SJVAPCD webpage: https://www.valleyair.org/transportation/CEQA%20Rules/GAMAQI-SPAL.PDF
**No HHDTs are actually anticipated for standard operations of this project. Current levels of vehicular transportation are considered baseline in this document.

The proposed Project would not exceed the established SPAL limits for a "High School" education project. The Project would construct 50,000 square feet of educational buildings compared to the allowable project size of 153,600 square feet. And based on the CalEEMod default trip rate, the Project's average daily trips (ADTs) would be below the SPAL ADT thresholds. Based on the above information, this Project qualifies for a limited air quality analysis applying the SPAL guidance to determine air quality impacts.

Because of the region's federal nonattainment status for ozone and PM2.5, and State nonattainment status for ozone, PM2.5, and PM10, if the project-generated emissions of either the ozone precursor pollutants [reactive organic gases (ROG) or oxides of nitrogen (NOx)], PM10, or PM2.5 were to exceed the SJVAPCD's significance thresholds, then the project uses would be considered to conflict with the attainment plans.

Project Emissions

A cursory review of the Project emissions was conducted to demonstrate that it would not exceed established air quality emissions thresholds, pursuant to the SJVAPCD's GAMAQI.

Short-Term Emissions

CalEEMod was used to estimate emissions from construction worker vehicles and on-site construction equipment. CalEEMod default construction schedule and equipment were used to estimate Project emissions.

Adjustments to the CalEEMod default values were as follows:

- Land use lot acreage was adjusted to match the Project description.
- Paving and landscape square footage was adjusted to match estimates based on the Project site plan.

Even though unmitigated emissions would be less than the air quality thresholds, the Project also must comply with the required SJVAPCD mitigation measures to limit fugitive dust emissions. The following mitigation measures were applied in CalEEMod, resulting in mitigated emissions shown in Table 3.4.3-2:

- Water exposed area three times per day.
- Reduce vehicle speed to less than 15 miles per hour on unpaved roads.

Table 3.4.3-2 presents the Project's short-term emissions and demonstrates that the Project's construction activities would not exceed construction significance thresholds. Therefore, construction emissions were found to be less than significant, and no further evaluation is required. Emission calculations are available in Appendix A.

Table 3.4.3-2
Short-Term Project Emissions

Emissions Source	Pollutant (tons/year)					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
2026	0.20	1.80	2.18	<0.005	0.19	0.10
2027	0.18	0.58	0.84	<0.005	0.04	0.02
Significance Threshold	10	10	100	27	15	15
Is Threshold Exceeded for a Single Year After Mitigation?	No	No	No	No	No	No

Source: Appendix A

Long-Term Emissions

Long-term emissions are caused by operational mobile sources and area source emissions from the Project.

Table 3.4.3-3 presents the Project's long-term operations emissions generated from mobile, energy, and area sources as well as from water use and waste generation emissions. Most of these emission impacts are from mobile sources traveling to and from the Project area.

CalEEMod was used to estimate emissions from students, staff, and visitor vehicles and on-site area sources. Default trips and fleet mix were used to represent trip data for the Project. The Project's long-term emissions demonstrated that the Project's operational activities would not exceed operational thresholds. Therefore, operational emissions were found to be less than significant, and no further evaluation is required. Emission calculations are available in Appendix A.

Table 3.4.3-3
Long-Term (Operational Emissions)

Emissions Source	Pollutant (tons/year)					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Project Operational Emissions	0.57	0.54	2.63	0.01	0.59	0.16
Significance Threshold	10	10	100	27	15	15
Is Threshold Exceeded After Mitigation?	No	No	No	No	No	No

Project's Contribution to Air Quality Violations

As demonstrated above, predicted construction and operational emissions would not exceed the SJVAPCD's significance thresholds for ROG, NOx, PM10, and PM2.5. As a result, the project would not conflict with emissions inventories contained in regional AQAPs and would not result in a significant contribution to the region's air quality non-attainment status or conflict with or obstruct implementation of the applicable air quality plan. Furthermore, the Project fell within the review parameters of SJVAPCD's SPAL process, which was established to determine whether a project, under specific parameters, has no possibility of exceeding criteria pollutant emissions thresholds. Therefore, the Project would have a less-than-significant impact on this criterion.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.3b – 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?

The SJVAB area is non-attainment for federal and State air quality standards for ozone, attainment of federal standards for PM10, and non-attainment for State standards, and non-attainment for federal and State standards for PM2.5. Nitrogen oxides and reactive organic gases are regulated as ozone precursors.

Operation of the Project site at full build-out is not expected to present a substantial source of fugitive dust (PM10) emissions. The main source of PM10 emissions would be from vehicular traffic associated with the Project site. PM10, on its own as well as in combination with other pollutants, creates a health hazard. The SJVAPCD's Regulation VIII establishes required controls to reduce and minimize fugitive dust emissions. The following SJVAPCD Rules and Regulations apply to the proposed Project (and all projects):

- Rule 4102 – Nuisance – prohibits a facility from posing as a nuisance to surrounding receptors and can impose penalties for nuisance issues such as dust, smoke, excess emissions, etc. Compliance with this rule ensures that the area around the Project site will not be adversely impacted by such issues.

- Regulation VIII – Fugitive PM_{10} Prohibitions – a series of regulations to reduce and/or eliminate the generation of particulate matter that can adversely impact visibility as well as the health and safety of people on-site or in the vicinity of the Project.

    - Rule 8011 - General Requirements – this rule is to reduce ambient concentrations of fine particulate matter (PM10) by requiring actions to prevent, reduce, or mitigate anthropogenic (human-caused) fugitive dust emissions.

    - Rule 8021 - Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities – restricts generation of airborne dust and visibility impacts from these activities. Places limits on opacity and equipment operation under certain adverse weather conditions.

    - Rule 8041 - Carryout and Trackout – requires that equipment and vehicles leaving the construction site control the amount of dirt, soil, or mud that is tracked off-site and onto public roadways. This helps eliminate or minimize dust generation and opacity degradation.

    - Rule 8051 - Open Areas – limits fugitive dust from open areas, i.e., areas on a construction site that are not actively being constructed upon but may generate wind-blown dust.

The Project would comply with applicable SJVAPCD Rules and Regulations and additional emissions reduction measures recommended in the *Air Quality Impact Analysis*. As shown in Tables 3.4.3-2 and 3.4.3-3 above, the Project demonstrates that emissions would be less than the significant thresholds identified by the SJVAPCD. Given this, the Project would not 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; therefore, the Project would have a less-than-significant impact on this criterion.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant.*

Impact #3.4.3c – Expose sensitive receptors to substantial pollutant concentrations?

Sensitive receptors are defined as locations where young children, chronically ill individuals, the elderly, or people who are more sensitive than the general population reside, such as schools, hospitals, nursing homes, and daycare centers (Appendix A). The nearest residential sensitive receptor is located adjacent to the proposed Project site on the east, west, and south.

The closest school is the Project site, Emerson Middle School, and McKinley Elementary School, located adjacent to the north of the Project site. The closest hospital is Dignity Health – Mercy Hospital Downtown, located 1.25 miles northwest, and the closest assisted living facility is Redwood Senior Living, located 0.78 miles to the southeast. The nearest daycare facility is Noah's Ark Preschool, located 0.41 miles to the west of the Project.

Based on the predicted operational emissions and activity types, the proposed Project is not expected to affect any on-site or off-site sensitive receptors and is not expected to have any adverse impacts on any known sensitive receptors.

This Impact section discussion is relevant to the school siting criteria factors referenced in Education Code Section 17251 and Title 5 CCR Sections 14001 through 14012. Considering that VCHS was established in 1967, there is a likelihood that the school may have been painted with lead-based paint and constructed with materials that contain asbestos (Center for Disease Control, 2025; United States Environmental Protection Agency, 2024). The District will perform appropriate testing and any necessary abatement prior to demolition, which would include air quality district review. Therefore, the Project would result in a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant.*

Impact #3.4.3d – Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Hazardous Pollutants

Projects are considered for potential health risks wherein a new or modified source of Hazardous Air Pollutants (HAPs) is proposed for a location near an existing residential area or other sensitive receptor when evaluating potential impacts related to HAPs (Appendix A).

The proposed Project would result in emissions of HAPs during construction and would be located near existing residents; therefore, an assessment of the potential risk to the population attributable to emissions of hazardous air pollutants from the proposed Project is required.

To predict the potential health risk to the population attributable to emissions of HAPs from the proposed Project, ambient air concentrations were predicted with dispersion modeling to arrive at a conservative estimate of increased individual carcinogenic risk that might occur as a result of continuous exposure over the construction period for construction emissions. Similarly, predicted concentrations were used to calculate non-cancer chronic and acute hazard indices, which are the ratio of expected exposure to acceptable exposure. The basis for evaluating potential health risks is the identification of sources with increased HAPs. HAP emissions from anticipated on-site construction activities were evaluated.

Health risk is determined using the Hotspots Analysis and Reporting Program (HARP) software distributed by the California Air Resources Board (CARB). Hotspots Analysis and Reporting Program Version 2 (HARP2) requires peak 1-hour emission rates and annual-averaged emission rates for all pollutants for each modeling source. The assumptions used to calculate the emission rates for the proposed Project are outlined below. The most recent version of the Environmental Protection Agency's (EPA) AMS/EPA Regulatory Model – AERMOD (recompiled for the Lakes ISC-AERMOD View) was used to predict the dispersion of emissions from the proposed Project. The analysis employed all of the regulatory default AERMOD model keyword parameters, including elevated terrain options.

Diesel combustion emissions from diesel on-site construction equipment were modeled as an area source for on-site construction activity on the property. Diesel particulate matter was calculated using CalEEMod for on-site construction. A unit emission rate of one gram/second (g/sec) was input to AERMOD for each source.

A fenceline discrete receptor grid was placed around the Project site in order to evaluate residences and businesses within close proximity of the Project site. A three-tier grid was used with 25-meter fenceline spacing. The first tier extended 100 meters with a 25-meter tier spacing, the second tier extended an additional 200 meters with a 50-meter tier spacing, and the third tier extended another 400 meters with a 100-meter tier spacing. A total of 1,200 discrete off-site receptors were analyzed. Elevated terrain options were employed even though there is no complex terrain in the Project area. The 7.5-minute DEM terrain data for Lamont, CA, and Gosford, CA, were processed with AERMAP to identify elevations for the proposed Project.

SJVAPCD-provided AERMET processed meteorological datasets for the Fresno monitoring station, calendar years 2018 through 2022, were input to AERMOD (SJVAPCD, 2025d). This was the most recent available dataset at the time the modeling was conducted. Rural dispersion parameters were used because the operation and the majority of the land surrounding the facility are considered "rural" under the Auer land use classification method (Appendix A).

Plot files generated by AERMOD were uploaded to the Air Dispersion Modeling and Risk Assessment Tool (ADMRT) program in the Hotspots Analysis and Reporting Program Version 2 (HARP2). ADMRT post-processing was used to assess the potential for excess cancer risk and chronic and acute non-cancer effects using the most recent health effects data from the California EPA Office of Environmental Health Hazard Assessment (OEHHA) using the OEHHA Derived Method. HARP2 site parameters were set for the mandatory minimum pathways of inhalation, homegrown gardens, soil ingestion, dermal, and mother's milk. The non-inhalation pathways used a deposition rate of 0.02 m/s along with all other default parameters. Risk reports were generated using the derived OEHHA analysis method for carcinogenic risk and non-carcinogenic chronic and acute risk. Site parameters are included in the HARP2 output files. Total cancer risk was predicted for the inhalation pathway at each receptor. A hazard index was computed for chronic non-cancer health effects for each applicable endpoint and each receptor. A hazard index for acute non-cancer health effects was not computed since Diesel Particulate Matter (DPM) does not have a risk exposure level for acute risk.

SJVAPCD has set the level of significance for carcinogenic risk at twenty in one million, which is understood as the possibility of causing 20 additional cancer cases in a population of one million people. The level of significance for chronic non-cancer risk is a hazard index of 1.0. All receptors were modeled with a three-year exposure to construction activities.

The carcinogenic risk and the health hazard index (HI) for chronic non-cancer risk at the point of maximum impact (PMI) do not exceed the significance levels of twenty in one million (20 x 10-6) and 1.0, respectively, for the proposed Project. The PMIs are identified by receptor location and risk and are provided in Table 3.4.3-4. The electronic AERMOD and HARP2 output files are provided in Appendix A.

Table 3.4.3-4
Potential Maximum Impacts Predicted by HARP

	Cancer Risk	Chronic Hazard Index
Total Construction	11.8E-06	6.88E-03
SJVAPCD Threshold	20.0E-06	1.0
Exceedance?	No	No
Receptor #	6	6
UTM Easting (m)	317481.98	317481.98
UTM Northing (m)	3914457.97	3914457.97

Note: UTM = Universal Transverse Mercator
Source: Appendix A

As shown above in Table 3.4.3-4, the maximum predicted cancer risk for the proposed Project is 11.8E-06. The maximum chronic non-cancer hazard index for the proposed Project is 6.88E-03. Since the PMI remained below the significance threshold for cancer and chronic risk, this Project would not have an adverse effect on any of the surrounding communities.

The potential health risk attributable to the proposed Project is determined to be less than significant based on the following conclusions:

- Potential carcinogenic risk from the proposed Project is below the significance level of ten in a million at each of the modeled receptors.
- The hazard index for the potential chronic non-cancer risk from the proposed Project is below the significance level of 1.0 at each of the modeled receptors.
- The hazard index for the potential acute non-cancer risk was not calculated since there is no acute risk associated with DPM emission; therefore, the proposed Project is considered below the significance level.

Therefore, the potential risk to the population attributable to emissions of HAPs from the proposed Project would be less than significant.

Odors

An evaluation is typically conducted for both of the following situations: (1) a potential source of objectionable odors is proposed for a location near existing sensitive receptors, and (2) sensitive receptors are proposed to be located near an existing source of objectionable odors. The criteria for this evaluation are based on the Lead Agency's determination of the proximity to one another of the proposed project and the sensitive receptors. A sensitive receptor is a location where human populations, especially children, senior citizens, and sick persons, are present, and where there is a reasonable expectation of continuous human exposure to pollutants, according to the averaging period for ambient air quality standards, i.e., the 24-hour, 8-hour, or 1-hour standards. Commercial and industrial sources are not considered sensitive receptors.

The proposed Project is not considered a source of objectionable odors or odorous compounds. Furthermore, there does not appear to be any significant source of objectionable odors in close proximity that may adversely impact the project site when it is in operation. As such, the proposed project will not be a source of any odorous compounds, nor will it likely be impacted by any odorous source.

Naturally Occurring Asbestos

The CARB has an Airborne Toxic Control Measure (ATCM) for construction, grading, quarrying, and surface mining operations requiring the implementation of mitigation measures to minimize emissions of asbestos-laden dust. This ATCM applies to road construction and maintenance, construction and grading operations, and quarries and surface mines when the activity occurs in an area where naturally occurring asbestos is likely to be found. No naturally-occurring asbestos is suspected within 10 miles of the project site.

Valley Fever Exposure

Valley Fever, or coccidioidomycosis, is an infection caused by inhalation of the spores of the fungus, *Coccidioides immitis*. The spores live in soil and can live for an extended time in

harsh environmental conditions. Activities or conditions that increase the amount of fugitive dust contribute to greater exposure, and include dust storms, grading, and recreational off-road activities.

There is a potential risk of contracting Valley Fever within the region based on the general similarity between the sediments known to contain the spores and the sediments believed to be present in the area of the proposed project. In addition, it must be noted that: (1) airborne dust containing the spores can be transported to the project area from other areas within the Bakersfield area potentially exposing those present to the disease and (2) persons who have not resided in the Bakersfield area may be more susceptible to contracting the disease than long-time residents due to any environmental, medical, and personal factors. (Note: The conclusions regarding the potential for either exposure to or contraction of Valley Fever through the construction of the proposed project should not be construed as a professional medical or public health opinion. These conclusions are merely a review of the geologic condition of the project site relative to the potential presence of sediments known to contain the Valley Fever spore.)

The proposed project has the potential to generate substantial amounts of fugitive dust and suspend Valley Fever spores with the dust that could then reach nearby sensitive receptors. During project construction, it is possible that on-site workers could be exposed to valley fever as fugitive dust is generated during construction. The Project would minimize the generation of fugitive dust by complying with the SJVAPCD's Regulation VIII. Dust-disturbing activities would be limited in scope and duration.

Conclusion

As analyzed above, the Project will result in a less-than-significant impact on other emissions (such as those leading to odors), adversely affecting a substantial number of people.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant.*

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact

3.4.4 - BIOLOGICAL RESOURCES

Would the Project:

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?	☐	☒	☐	☐
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?	☐	☐	☐	☒
c.	Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
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?	☐	☐	☐	☒
e.	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Discussion

The analyses in this section are based on a Biological Resources Evaluation (BRE) prepared for this Project (QK, 2025b), attached as Appendix B.

Impact #3.4.4a – Would the Project 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?

On September 11, 2025, QK biologists conducted a biological reconnaissance survey of the Project site and a 50-foot buffer area (also called the Biological Survey Area or BSA), where feasible. The purpose of the survey was to determine the locations and extent of potential plant communities and sensitive habitats, and the potential for the occurrence of special-status plant and animal species within the Project site and surrounding buffer area. The entire BSA was surveyed, where feasible. Survey methodologies included walking meandering pedestrian transects through all present habitat types. Photographs were taken to document the existing landscape of the Project site and adjacent land uses; detailed notes on observed plant and wildlife species and site conditions were taken while conducting the survey.

There are 29 special-status wildlife species identified in the literature and database review that are known or have the potential to occur within the nine-quad search area centered on the Project site (QK, 2025b). There are historical records of Crotch's bumble bee, Bakersfield legless lizard, California glossy snake, blunt-nosed leopard lizard, Swainson's hawk, western mastiff bat, Tulare grasshopper mouse, American badger, Horn's milk-vetch, hispid salty bird's-beak, and California satintail from the California Natural Diversity Database (CNDDB) that overlap the BSA; however, they are all from 1968 or earlier with low locational accuracy. There are no other historical records from the CNDDB or IPaC of any special-status wildlife species within the BSA.

The literature search determined that there is a potential for several special-status species to be present on the Project site. An evaluation of each of the potential special-status species, which included habitat requirements, likelihood of required habitat to occur within the Project area, and a comparison to the CNDDB records, was conducted. The results of this evaluation concluded that no special-status plant species are anticipated to occur on or near the Project site, and four wildlife species have a reasonable potential to occur on or near the Project site: western burrowing owl, Swainson's hawk, American badger, and San Joaquin kit fox.

General Wildlife and Plant

The Project site is predominantly developed with an existing school campus, which has been recently mowed and is primarily devoid of natural vegetation. No natural plant communities occur within the BSA. The Project site consists of urban development, maintained baseball fields, and contains ornamental shrubs and trees. The Project site is bordered by suburbs and the Kern Island Canal, which is routinely disked and void of vegetation.

There are large ornamental trees along the edge of the Project site that can support nesting birds and/or raptors. The private residences surrounding the Project site also have queen palm (*Syagrus romanzoffiana*) and pine (*Pinus sp.*) trees that could support nesting birds.

Common migratory bird species observed during the survey included Canada goose (*Branta canadensis*), killdeer (*Charadrius vociferus*), and Brewer's blackbird (*Euphagus cyanocephalus*).

The wildlife species inhabiting the Project site and its immediate surrounding area include those typically found in moderately to heavily disturbed habitats associated with urban development zones in Kern County and the southern San Joaquin Valley. When surveyed, the Project site had been recently disked, with little vegetation. There is a sump located on the southeast corner of the site that had water present at the time of the reconnaissance survey.

A total of two bird species, two mammal species, and one reptile species, or sign of, were identified during the survey. No plant species were identified during the survey. Table 3.4.4-1 below describes the plant and wildlife species observed on the Project site.

Table 3.4.4-1
Plant and Wildlife Species Observed within the BSA

Scientific Name	Common Name	Status
Plants		
Urban	None	None
Barren	None	None
Non-native ornamental trees	None	None
Birds		
Branta canadensis	Canada goose	None
Charadrius vociferus	killdeer	None
Euphagus cyanocephalus	Brewer's blackbird	None
Reptiles		
Uta stansburiana	side-blotched lizard	None
Mammals		
*Vulpes macrotis mutica**	San Joaquin kit fox	FE/ST
*Canis familiaris**	domestic dog	None

* Indicates that only sign (e.g., tracks, scat, burrows, dens, vocalizations) of the species was observed.

Sensitive Habitats and Special-Status Species

SPECIAL-STATUS PLANTS

There are 21 special-status plant species identified in the literature and database review that are known or have the potential to occur within the nine quadrangles centered on the Project site (QK, 2025b). No special-status plant species were present within the BSA. The survey coincided with some, but not all, of the plant species' optimal blooming periods; however, none of the species identified in the CNDDB or IPaC database queries are expected to occur on-site due to the lack of suitable habitat conditions and/or because the BSA is located outside of the species' known range. The Project site has no native habitat and is degraded from urban development, and the adjacent lands have been similarly disturbed by

development of active school campuses, residential subdivisions, and roadways. It is therefore highly unlikely that special-status plant species would be found on the site.

SPECIAL-STATUS WILDLIFE

The literature search and review of the pertinent databases indicated there are 29 special-status wildlife species identified in the literature and database review that are known or have the potential to occur within the nine-quad search area centered on the Project site (QK, 2025b). There are historical records of Crotch's bumble bee, Bakersfield legless lizard, California glossy snake, blunt-nosed leopard lizard, Swainson's hawk, western mastiff bat, Tulare grasshopper mouse, American badger, Horn's milk-vetch, hispid salty bird's-beak, and California satintail from the CNDDB that overlap the BSA; however, they are all from 1968 or earlier with low locational accuracy. There are no other historical records from the CNDDB or IPaC of any special-status wildlife species within the BSA.

Of the identified 29 special-status animal species known or with potential to occur in the vicinity of the Project site, 25 species were eliminated from consideration and discussion due to a lack of suitable habitat to support the species or the site being outside their known range. Four special-status species were determined to have the potential to occur on the Project site: western burrowing owl, Swainson's hawk, American badger, and San Joaquin kit fox. An evaluation of the potential for each of these species to occur on the Project site or within the BSA is based upon nearby occurrence records, habitat affinities, and current habitat conditions, and the wildlife movement corridor of the nearby canal is presented below. The BSA also has the potential for nesting birds and raptors occurring during the nesting season.

WESTERN BURROWING OWL

ATHENE CUNICULARIA HYPUGAEA
Status: State Candidate

Burrowing owls use earthen burrows, typically relying on other fossorial mammals to construct their burrows, such as the American badger. In California, burrowing owls are associated with California ground squirrels, which were not observed on site. Due to the ongoing use and maintenance of the Project site, there are limited suitable burrows for this species to inhabit.

There are 21 CNDDB recorded occurrences for the species within 10 miles of the BSA (CDFW, 2025a). The closest CNDDB recorded occurrence (EONDX 82920) is from 2007 and approximately 1.56 miles southeast of the Project site. This species is a highly mobile transient forager that preys on small burrowing mammals. While burrowing owls are not commonly acclimated to human interactions and noises, they have been found in urbanized settings. There is a small amount of suitable foraging and nesting habitat on the southeastern periphery of the BSA along the Kern Island Canal. Burrowing owls may be present as transient foragers, although this is also unlikely given the scarcity of a prey base, a small number of suitable available burrows observed on the Project site, and its current use as a high school campus.

Swainson's hawk

BUTEO SWAINSONI

Status: State Threatened

Swainson's hawks occur in grassland, desert, and agricultural landscapes throughout the Central Valley and Antelope Valley. Some hawks may be resident, especially in the southern portion of their range, while others may migrate between winter and breeding habitats. They prefer larger isolated trees or small woodlots for nesting, usually with grassland or dryland grain fields nearby for foraging, and have been known to nest in large eucalyptus trees (*Eucalyptus* sp.) along heavily traveled freeway corridors. Swainson's hawks forage in grassland, open scrub, pasture, and dryland grain agricultural habitats, primarily for rodents, and exhibit moderate to high nest site fidelity for successful nest sites.

There are five CNDDB recorded occurrences for this species within 10 miles of the BSA (CDFW, 2025a). The closest CNDDB record (EONDX 91383) is from 1935 and overlaps the Project site. The most recent CNDDB record (EONDX 118756) is from 2019 and approximately 6.30 miles south of the Project site. There was no sign of Swainson's hawk nests or individuals present during the survey. There is marginal foraging habitat (lack of small mammal burrows on the Project site and no agricultural uses in the vicinity) throughout the BSA. There is a more suitable foraging habitat in agricultural areas approximately three miles to the southeast. The perimeter of the BSA and nearby residential areas has mature ornamental trees that may provide nesting habitat, but due to the current urbanized conditions in the area, Swainson's hawk is unlikely to nest within the Project site.

American badger

TAXIDEA TAXUS

Status: CDFW Species of Special Concern

The American badger is an uncommon, permanent resident at lower elevations throughout California except for the northern North Coast. They can typically be found in grasslands, deserts, and drier habitats.

There are two CNDDB recorded occurrences for this species within 10 miles of the BSA (CDFW, 2025a). The most recent CNDDB record (EONDX 74778) is from 2008 and approximately 5.66 miles northeast of the Project site. No American badger or diagnostic sign (i.e., dens, claw marks, scat, tracks, or prey remains) was present during the survey. This species is a highly mobile transient forager that preys on small burrowing mammals (e.g., California ground squirrel). Minimal suitable foraging habitat is present along the nearby Kern Island Canal banks within the BSA.

San Joaquin kit fox

VULPES MACROTIS MUTICA

Status: Federally Endangered, State Threatened

The San Joaquin kit fox is a subspecies of kit fox that is endemic to the San Joaquin Valley, Carrizo Plain, and Cuyama Valley, as well as other small valleys in the western foothills of the

Central Valley of California (QK, 2025b). This species is a highly mobile, transient forager that preys on small burrowing mammals (e.g., the California ground squirrel), but will consume a variety of prey. It has adapted well to urbanized settings, even feeding on anthropogenic food sources. San Joaquin kit foxes use subterranean dens year-round for shelter and pup-rearing. They are nocturnally active but may be above ground near their dens during the day, particularly in the spring.

San Joaquin kit foxes are well established in the metropolitan Bakersfield area. There are 63 CNDDB recorded occurrences within 10 miles of the Project site. The closest record (EONDX 66504) is approximately 1.92 miles northwest of the Project site and is from 2006.

However, there is one historical San Joaquin kit fox natal den observed during the site survey. However, it appeared uninhabited at this time due to the presence of cobwebs at the burrow entrances and domestic dog tracks observed surrounding the den openings. It is possible that foxes may reside temporarily underneath seatrain structures located throughout the ball fields within the BSA, although no evidence of this was observed.

There is a lack of small mammal burrows within the Project site, although there is a small amount remaining between the Project site and the Kern Island Canal. Presently, the school may be a potential food source for the San Joaquin kit fox, via food trash and litter, given the limited prey base. It is believed that the kit fox population gets a majority of its food source from the student population.

CONCLUSION

There is potential for Project activities to result in impacts to four special-status wildlife species: western burrowing owl, Swainson's hawk, San Joaquin kit fox, and American badger. The potential for impacts to western burrowing owl, Swainson's hawk, and American badger, these special-status species, is low, based on the lack of suitable foraging habitat and the ongoing use of the site as a high school. However, there is a known San Joaquin kit fox natal den on site, and this species is known to be in the vicinity, although no individuals or active habitation were observed.

To reduce potential impacts to these or other special-status wildlife species, implementation of Mitigation Measures (MM) BIO-1 through BIO-5 as recommended would protect, avoid, and minimize impacts to western burrowing owl, Swainson's hawk, San Joaquin kit fox, American badger, other special-status wildlife species, nesting migratory birds and raptors, including the Swainson's hawk. MM BIO-1 will require a preconstruction survey to be conducted, and MM BIO-2 outlines the appropriate buffers from nests and burrows if they are observed on site. MM BIO-3 requires a qualified biologist to be on call and available, if needed, during construction. MM BIO-4 requires a biological monitor to be on site when the existing seatrain containers are removed. MM BIO-5 outlines measures that would be implemented during construction to protect San Joaquin kit fox and other special-status species, requires training for all construction personnel for biological resources and outlines other avoidance and minimization measures during construction. MM BIO-6 requires Swainson's hawk nest surveys to be conducted if construction starts during the nesting

season. MM BIO-7 outlines the procedures necessary to protect Swainson hawk and active raptor nests, provides for Swainson's hawk-specific protocol surveys and avoidance measures, and MM BIO-8 requires nesting bird surveys to be conducted if construction starts during nesting bird season (February 1 to September 15).

Due to the location of the known San Joaquin kit fox natal den on the campus, MM BIO-9 requires the Project proponent or contractor to consult with the California Department of Fish and Wildlife (CDFW) and obtain an Incidental Take Permit (ITP) to cover potential take of the species during construction activities. This measure outlines several possible measures that might be required by the ITP, including but not limited to the installation of artificial dens, the purchase of compensatory credits from a known mitigation and conservation bank, and/or purchasing additional land that is suitable for the San Joaquin kit fox. Compliance with Mitigation Measures BIO-1 through BIO-9 would protect, avoid, and minimize impacts to special-status wildlife species. When implemented, these measures would reduce impacts to these species to below significant levels.

MITIGATION MEASURE(S)

MM BIO-1: Within 14 days prior to the start of Project ground-disturbing activities, a pre-construction survey shall be conducted by a qualified biologist knowledgeable in the identification of these species. Surveys for active, known, potential, and natal San Joaquin kit fox dens within and adjacent to the Project site will be conducted following the United States Fish and Wildlife Service's (USFWS) "Standardized recommendations for protection of the San Joaquin kit fox prior to or during ground disturbance" (2011). Surveys for active western burrowing owl burrows within and adjacent to the Project Area will be conducted following the CDFG's "Staff Report on Burrowing Owl Mitigation" (2012). If no special-status species or their sign (tracks, scat, etc.) are observed during the survey, no further action is required. A copy of the pre-construction survey report shall be submitted to the lead agency prior to the start of construction.

If, during construction activities, a live burrowing owl, American badger, or San Joaquin kit fox is encountered, all construction activity shall stop in the affected area until the animal leaves of its own volition. The special-status species shall be avoided by construction activities and construction workers, and allowed to leave the Project site without harassment.

MM BIO-2: If dens/burrows that could support any of these species are discovered during the pre-construction survey (BIO-1), the avoidance buffers outlined below shall be established. No work would occur within these buffers unless the biologist approves and monitors the activity.

San Joaquin Kit Fox

- Potential or Atypical den – 50 feet
- Known den – 100 feet
- Natal or pupping den – 500 feet, unless otherwise specified by CDFW

Western Burrowing Owl (active burrows)

- April 1-August 15
  - Low disturbance – 200 m
  - Medium disturbance– 500 m
  - High disturbance – 500 m
- August 16-October 15
  - Low disturbance – 200 m
  - Medium disturbance – 200 m
  - High disturbance – 500 m
- October 16-March 31
  - Low disturbance – 50 m
  - Medium disturbance – 100 m
  - High disturbance – 500m

American Badger/San Joaquin kit fox

- Potential or Atypical den – 50 feet
- Known den – 100-feet
- Natal or pupping den – 500 feet, unless otherwise specified by CDFW.

If any of these species are found within these recommended buffers and avoidance is not possible, consultation with CDFW shall be initiated. CDFW may allow burrow exclusion by a qualified biologist and only during the non-breeding season, before breeding behavior is exhibited, and after the burrow is confirmed empty through non-invasive methods, such as surveillance. An ITP may be required by CDFW prior to any exclusion activity being completed.

MM BIO-3: A qualified biologist shall remain on-call throughout the construction phase if a western burrowing owl, American badger, or San Joaquin kit fox occurs on the site during construction. If one of these species occurs on-site, work shall be halted in that area. The biologist shall be contacted immediately to determine whether biological monitoring or the implementation of avoidance buffers may be warranted.

MM BIO-4: A qualified biologist shall thoroughly inspect and monitor cargo containers for kit foxes and other animals before and during the removal of cargo containers.

MM BIO-5: The following avoidance and minimization measures shall be implemented during the construction of the Project to reduce the potential for impact from the Project. They are modified from the U.S. Fish and Wildlife Service Standardized Recommendations for Protection of the Endangered San Joaquin kit fox Prior to or During Ground Disturbance (USFWS 2011, Appendix E).

l. All food-related trash items such as wrappers, cans, bottles, and food scraps shall be disposed of in securely closed containers and removed at least once a week from the construction or Project Site.

m. Construction-related vehicle traffic shall be restricted to established roads and predetermined ingress and egress corridors, staging, and parking areas. Vehicle speeds shall not exceed 20 miles per hour (mph) within the Project Site.
n. A Worker Environmental Awareness Training Program shall be prepared and presented to all workers who will be on-site during construction activities
o. To prevent inadvertent entrapment of kit fox or other animals during construction, the contractor shall cover all excavated, steep-walled holes or trenches more than two feet deep at the close of each workday with plywood or similar materials. If holes or trenches cannot be covered, one or more escape ramps constructed of earthen fill or wooden planks shall be installed in the trench. Before such holes or trenches are filled, the contractor shall thoroughly inspect them for entrapped animals. All construction-related pipes, culverts, or similar structures with a diameter of four inches or greater that are stored on the Project Site shall be thoroughly inspected for wildlife before the pipe is subsequently buried, capped, or otherwise used or moved in any way. If at any time an entrapped or injured kit fox is discovered, work in the immediate area shall be temporarily halted, and USFWS and CDFW shall be consulted.
p. Kit foxes are attracted to den-like structures such as pipes and may enter stored pipes and become trapped or injured. All construction pipes, culverts, or similar structures with a diameter of four inches or greater that are stored at a construction site for one or more overnight periods shall be thoroughly inspected for kit foxes before the pipe is subsequently buried, capped, or otherwise used or moved in any way. If a kit fox is discovered inside a pipe, that section of pipe shall not be moved until the USFWS and CDFW have been consulted. If necessary, and under the direct supervision of the biologist, the pipe may be moved only once to remove it from the path of construction activity until the fox has escaped.
q. No pets, such as dogs or cats, shall be permitted on the Project sites to prevent harassment, mortality of kit foxes, or destruction of dens.
r. Use of anti-coagulant rodenticides and herbicides in Project sites shall be restricted. This is necessary to prevent primary or secondary poisoning of kit foxes and the depletion of prey populations on which they depend. All uses of such compounds shall observe label and other restrictions mandated by the U.S. Environmental Protection Agency, California Department of Food and Agriculture, and other State and federal legislation, as well as additional Project-related restrictions deemed necessary by the USFWS and CDFW. If rodent control must be conducted, zinc phosphide shall be used because of the proven lower risk to kit foxes.
s. A representative shall be appointed by the Project proponent who will be the contact source for any employee or contractor who might inadvertently kill or injure a kit fox or who finds a dead, injured, or entrapped kit fox. The representative shall be identified during the employee education program, and their name and telephone number shall be provided to the USFWS.
t. The Sacramento Fish and Wildlife Office of USFWS and CDFW shall be notified in writing within three working days of the accidental death or injury to a San Joaquin kit fox during Project-related activities. Notification must include the date, time, and location of the incident or of the finding of a dead or injured animal and any other pertinent information. The USFWS contact is the Chief of the Division of Endangered

Species, at the addresses and telephone numbers below. The CDFW contact can be reached at (559) 243-4014 and R4CESA@wildlifeca.gov.

u. All sightings of the San Joaquin kit fox shall be reported to the CNDDB. A copy of the reporting form and a topographic map clearly marked with the location of where the kit fox was observed shall also be provided to the Service at the address below.
v. Any Project-related information required by the USFWS or questions concerning the above conditions, or their implementation may be directed in writing to the U.S. Fish and Wildlife Service at: Endangered Species Division, 2800 Cottage Way, Suite W 2605, Sacramento, California 95825-1846, phone: (916) 414-6620 or (916) 414-6600.

MM BIO-6: If Project construction activities must occur during the Swainson's hawk nesting season (February 15 to August 31), pre-construction activity surveys shall be conducted for Swainson's hawk nests in accordance with the Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley, Swainson's Hawk Technical Advisory Committee (CDFG, 2000). The timing and the number of phases of surveys can be adjusted based on the timing of the construction schedule. The surveys may be phased to coincide with active construction areas, plus a 0.5-mile buffer of those areas. The buffers, at the qualified biologist's discretion, may be altered based upon site conditions. If no active nests are observed during the surveys, no additional action is required.

MM BIO-7: If an active Swainson's hawk nest is discovered at any time within 0.5 miles of active construction, a qualified biologist shall complete an assessment of the potential for current construction activities to impact the nest. The assessment would consider the type of construction activities, the location of construction relative to the nest, the visibility of construction activities from the nest location, and other existing disturbances in the area that are not related to the construction activities of this Project. Based on this assessment, the biologist will determine if construction activities can proceed and the level of nest monitoring required. Construction activities shall not occur within 0.5 miles of an active nest, but depending upon conditions at the site, this distance may be reduced. Full-time monitoring to evaluate the effects of construction activities on nesting Swainson's hawks may be required. The qualified biologist shall have the authority to stop work if it is determined that the Project construction is disturbing the nest. These buffers may need to be increased depending on the sensitivity of the nesting Swainson's hawk to disturbances and at the discretion of the qualified biologist. No avoidance would be needed if construction occurs near a known Swainson's hawk nest outside of the Swainson's hawk nesting season.

MM BIO-8: If Project construction activities are initiated during the nesting season (February 1 to September 15), a preconstruction activity nesting bird survey shall be conducted within 14 days prior to the start of ground disturbance activities. The surveys shall encompass the Project site and a 250-foot buffer for songbirds and a 500-foot buffer for raptors.

The surveys may be phased with the construction of the Project. If no active nests are found, no further action is required. However, existing nests may become active and new nests may be built at any time prior to and throughout the nesting season, including when construction activities are in progress. Surveys for burrowing owl shall follow CDFW protocol.

If active nests are found during the survey or at any time during construction of the Project, an avoidance buffer ranging from 50 feet to 500 feet may be required, with the avoidance buffer from any specific nest being determined by a qualified biologist. The avoidance buffer will remain in place until the biologist has determined that the young are no longer reliant on the adults or the nest, or if breeding attempts have otherwise been unsuccessful. Work may occur within the avoidance buffer under the approval and guidance of the biologist, but full-time monitoring may be required. The biologist shall have the ability to stop construction if nesting adults show any sign of distress.

MM BIO-9: Prior to start of demolition, if impacts to San Joaquin kit fox cannot be avoided, the Project developer/contractor shall obtain and ITP from CDFW and follow all requirements, which could include, but not be limited to: the construction of artificial dens, purchasing compensation credits from an authorized mitigation and conservation bank, and/or purchasing additional land that is suitable for San Joaquin kit fox.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant with mitigation incorporated.*

Impact #3.4.4b – Would the Project 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?

RIPARIAN HABITAT

There is no riparian habitat on the Project site. It is an active high school campus that includes numerous buildings, structures, athletic fields, and parking lots. There are large trees found throughout the campus, but they do not meet the criteria as a riparian habitat.

SENSITIVE NATURAL COMMUNITIES

Literature reviews from the surrounding nine quadrangle queries for the Project site revealed five sensitive natural vegetation communities that may occur in the vicinity: Great Valley Cottonwood Riparian Forest, Great Valley Mesquite Scrub, Valley Sacaton Grassland, Valley Saltbush Scrub, and Valley Sink Scrub. These natural communities were not present in the BSA, and the BSA does not provide habitat that would support these communities.

Given that no riparian and sensitive natural communities were documented within the Project site and BSA, the Project would have no impact on riparian and sensitive natural communities.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be ***no impact***.

Impact #3.4.4c – Would the Project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

The National Hydrography Dataset (NHD) and National Wetlands Inventory (NWI) did not identify any wetlands or non-wetland waters within the Project site. During the site survey, no water features were observed within the BSA. The Kern Island Canal has a varying distance of approximately 75-100 feet from the southeast edge of the Project site. The Kern Island Canal will not be impacted by the Project development.

The United States Army Corps of Engineers (USACE) has regulatory authority over the Clean Water Act (CWA), as provided for by the EPA. The USACE has established specific criteria for the determination of wetlands based upon the presence of wetland hydrology, hydric soils, and hydrophilic vegetation. There are no federally protected wetlands or vernal pools that occur within the Project site.

Wetlands, streams, reservoirs, sloughs, and ponds typically meet the criteria for federal jurisdiction under Section 404 of the CWA and State jurisdiction under the Porter-Cologne Water Quality Control Act. Streams and ponds typically meet the criteria for State jurisdiction under Section 1602 of the California Fish and Game Code. There are no features on the Project site that would meet the criteria for either federal or State jurisdiction. Accordingly, there are no wetlands or Waters of the U.S. occurring on the Project site. There would be no impact to federally protected wetlands or waterways as a result of the proposed Project. Therefore, the Project would have no impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be ***no impact***.

Impact #3.4.4d – 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?

Wildlife migratory corridors are described as a narrow stretch of land that connects two open pieces of habitat that would otherwise be unconnected. These routes provide shelter and sufficient food supplies to support wildlife species during migration. Movement corridors generally consist of riparian, woodlands, or forested habitats that span contiguous acres of undisturbed habitat and are important elements of resident species' home ranges.

The BSA is not within any designated wildlife linkage or movement corridors. The Project is situated within an area developed for urban use and does not provide a linkage between suitable natural habitats for most wildlife species. The adjacent canal has the potential to facilitate movement of wildlife onto or off the BSA, but it is heavily disturbed and regularly maintained, and it is predominantly devoid of vegetation.

The Project would not 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; therefore, there would be no impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be ***no impact.***

Impact #3.4.4e – Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

There are no adopted local policies or ordinances protecting biological resources that would apply to this Project site. Therefore, implementation of the proposed Project would have no conflict related to the adopted local policies or ordinances protecting biological resources.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be ***no impact***.

Impact #3.4.4f – 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?

The Project is not located within a Habitat Conservation Plan, Natural Community Conservation Plan, or any other local, regional, or State conservation plan. Therefore, the proposed Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be ***no impact.***

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
3.4.5 - CULTURAL RESOURCES				
Would the Project:				
a. Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5?	☐	☒	☐	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?	☐	☒	☐	☐
d. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

Discussion

The discussion below is based on the Cultural Resources Technical Memo completed for the Project, attached as Appendix C (QK, 2025c).

Impact #3.4.5a – Would the Project cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5?

As defined by CEQA Guidelines Section 15064.5, "historical resources" are:

- A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Public Resource Code Section 5024.1, Title 14 CCR, Section 4850 et seq.).
- A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in a historical resource survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Public Resources Code Section 5024.1, Title 14 CCR, Section 4852), including the following:

- Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- Is associated with the lives of persons important in our past.
- Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
- Has yielded, or may be likely to yield, information important in prehistory or history.

A cultural resources records search (#25-302) was conducted at the Southern San Joaquin Valley Information Center at California State University, Bakersfield, regarding the Project. The purpose of the search was to determine whether any known cultural resources were located on or near the proposed project that might be impacted by project development and/or activities. The records search indicated that although the project had never been surveyed for cultural resources, it was included within the boundaries of an overview for a significant redevelopment project. No cultural resources were identified on the Project site (QK, 2025c). Additionally, seven previous cultural resource surveys were conducted within a half-mile radius.

Eleven historic eras (i.e., 45+ years old) cultural resources have been recorded within one-half mile of the project. These include six single-family residences (Primary nos. P-15-007961, -007962, -007963, -007968, -007969, -008129), a commercial building (P-15-007960), two building foundations (P-15-021381, -021382), the Kern Island Canal (P-15-013707), and the State Route/Golden State Avenue Bridge (P-15-018885). The project will not impact the Kern Island Canal or other cultural resources located off-site. As a result of these surveys, it was determined that there were no recorded cultural resources on the Project site.

On August 1, 2025, pursuant to Public Resources Code §21080.3.1 and Government Code §65300 et seq, Assembly Bill 52, letters were sent to each of the Native American tribes within the geographic area as identified by the NAHC (see Appendix C). The letters included a Project description and location maps. Tribal consultation under AB 52 closed on August 7, 2025. Follow-up contact was initiated on August 21, 2025. One response was provided over the phone from Curtis Alcantar, Cultural and Natural Resource Manager for the Tejon Indian Tribe, in which the individual stated the Tribe was aware that Ohlone people were in the area, but he didn't have any evidence of this, and declined consultation and would like to be contacted if cultural resources are identified. To date, no other Tribes have responded.

Although the components of the Project are within the existing disturbed sites, unknown historical or archaeological cultural resources may be discovered during ground-disturbing activities. In order to account for unanticipated discoveries and the potential to impact previously undocumented or unknown cultural resources, the following mitigation measure is recommended. Implementation of the MM CUL-1 below would ensure that the proposed Project would not cause a substantial adverse change in the significance of a historical resource, and impacts would be less than significant.

MITIGATION MEASURE(S)

MM CUL-1: If prehistoric or historic-era cultural materials are encountered during construction activities, all work in the immediate vicinity of the find shall halt until a qualified archaeologist can evaluate the find and make recommendations. Cultural resource materials may include prehistoric resources such as flaked and ground stone tools and debris, shell, bone, ceramics, and fire-affected rock, as well as historic resources such as glass, metal, wood, brick, or structural remnants. If the qualified archaeologist determines that the discovery represents a potentially significant cultural resource, additional investigations may be required to mitigate adverse impacts from Project implementation. These additional studies may include avoidance, testing, and evaluation, or data recovery excavation.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant with mitigation incorporated*.

Impact #3.4.5b – Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?

See discussion of Impact #3.4.5a above.

The sites have been disturbed previously. The construction of the Project will include shallow trenching to place new piping underground, and some minor grading may be necessary to construct equipment and structures. Although unlikely, there is a chance that trenching and grading activities could unearth previously unknown archaeological resources. Implementation of MM CUL-1 would ensure that potential impacts associated with previously unknown historical or archaeological cultural resources during the construction-related activities would be less than significant. With the implementation of these mitigation measures, the impacts would be less than significant.

MITIGATION MEASURE(S)

Implementation of Mitigation Measures MM CUL-1.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant with mitigation incorporated*.

Impact #3.4.5c – Would the Project disturb any human remains, including those interred outside of formal cemeteries?

Although unlikely, subsurface construction activities, such as trenching and grading, associated with the proposed Project could potentially disturb previously undiscovered human burial sites. Accordingly, this is a potentially significant impact. Although considered unlikely, subsurface construction activities could cause a potentially significant impact to previously undiscovered human burial sites. The records searches did not indicate the

presence of human remains, burials, or cemeteries within the Project site. No human remains have been discovered at the Project site, and no burials or cemeteries are known to occur within the area of the site. However, construction would involve earth-disturbing activities, and it is still possible that human remains may be discovered, possibly in association with archaeological sites. Implementation of MM CUL-2 would ensure that the proposed Project would not directly or indirectly destroy previously unknown human remains. The proposed Project would not disturb any known human remains, including those interred outside of formal cemeteries. Therefore, the Project would have a less-than-significant impact with the incorporation of mitigation measures.

MITIGATION MEASURE(S)

MM CUL-2: If human remains are discovered during construction or operational activities, further excavation or disturbance shall be prohibited pursuant to Section 7050.5 of the California Health and Safety Code. The specific protocol, guidelines, and channels of communication outlined by the Native American Heritage Commission, in accordance with Section 7050.5 of the Health and Safety Code, Section 5097.98 of the Public Resources Code (Chapter 1492, Statutes of 1982, Senate Bill 297), and Senate Bill 447 (Chapter 44, Statutes of 1987), shall be followed. Section 7050.5(c) shall guide the potential Native American involvement, in the event of discovery of human remains, at the direction of the county coroner.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant with mitigation incorporated*.

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

The analyses in this section are based in part on a Small Project Analysis Level (SPAL) prepared for this Project (QK, 2025a), attached as Appendix A.

Discussion

Impact #3.4.6a – Would the Project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?

Construction

Construction-related activities of the proposed Project would increase energy (in the form of fuel) consumption due to the operation of construction-related equipment. Construction-related activities will be short-duration and temporary in nature regarding gasoline and diesel fuel consumption. The increase in fuel (energy) consumption associated with construction-related activities would be minimal in comparison to Statewide and regional fuel consumption. There are no unusual Project characteristics that would cause construction equipment to be less energy efficient compared with other similar construction sites in other parts of the State. Thus, construction-related fuel consumption at the Project would not result in inefficient, wasteful, or unnecessary energy use.

Construction-related equipment and vehicles would be operated in accordance with energy efficiency standards required under the California Energy Code and State-level policies adopted by the California Energy Commission (CEC), including the Energy Action Plan that prioritizes energy resources efficiency for California's future energy needs, thereby minimizing energy consumption associated with the construction-related equipment and vehicles primarily powered by non-renewable fuels. This includes limiting idling time, ensuring that all equipment is maintained as recommended by manufacturer manuals, using electric equipment whenever possible in lieu of diesel- or gasoline-powered equipment, etc.

The Project would comply with the SJVAPCD requirements regarding the limitation of vehicle idling and the use of fuel-efficient vehicles and equipment, to the extent feasible. Energy-saving strategies will be implemented where possible to further reduce the Project's energy consumption during the construction phase. Strategies being implemented include those recommended by the California Air Resources Board (CARB) that may reduce both the Project's energy consumption, including diesel anti-idling measures, light-duty vehicle technology, usage of alternative fuels such as biodiesel blends and ethanol, and heavy-duty vehicle design measures to reduce energy consumption. While the construction of the proposed Project will result in additional energy consumption, this energy use is not unnecessary or inefficient. This energy use is justified by the energy-efficient nature of the proposed Project and would be limited to the greatest extent possible through compliance with local, State, and federal regulations.

Operations

Electricity service for the proposed Project would continue to be provided by Pacific Gas and Electric Company (PG&E). Energy demand during the operational phase would result from building and infrastructure, such as, but not limited to, HVAC systems, lighting, and computer equipment. Considering the intent of the Project is to modernize the existing infrastructure and amenities offered at the school, new infrastructure and equipment are inherently more efficient than older models, which will reduce the waste of energy resources. The existing school site utilizes rooftop solar to offset the school's energy consumption; rooftop solar will also be installed at the modern school site.

Furthermore, the Project must comply with CDE and DSA requirements for construction, including compliance with Title 5 and the California Energy Code of Regulations. Finally, the Project will comply with the 2022 California Green Building Standard Codes to the extent it is feasible to help reduce energy and water consumption.

The Project will also incorporate energy-saving design features to offset electrical lighting use in the facility by installing skylights and dual-pane glass windows with window treatments throughout the campus. Energy-efficient lighting and motion detector switches will be installed throughout the interior of the facility. In addition, the Project will use low-flow toilets and other water reduction methods. The campus will have landscaping, including xeriscaping, drought-tolerant plants and trees, and drip irrigation to reduce water consumption. Based on this analysis, the Project would not conflict with or obstruct a State or local plan related to renewable energy or energy consumption, and impacts would be less than significant. Construction and operations-related fuel consumption at the Project would not result in inefficient, wasteful, or unnecessary energy use. The Project would have a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant.*

Impact #3.4.6b – Would the Project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

See Impact #3.4.6a, above.

Energy-saving strategies will be implemented where feasible to reduce the Project's energy consumption during the construction and post-construction phases. Strategies being implemented include those recommended by CARB that may reduce both the Project's construction energy consumption, including diesel anti-idling measures, light-duty vehicle technology, usage of alternative fuels such as biodiesel blends and ethanol, and heavy-duty vehicle design measures to reduce energy consumption. Additionally, as outlined in the SJVAPCD's GAMAQI, the Project includes recommendations to reduce energy consumption by shutting down equipment when not in use for extended periods, limiting the usage of construction equipment to eight cumulative hours per day, usage of electric equipment for construction whenever possible in lieu of diesel or gasoline powered equipment, and to encourage employees to carpool to retail establishments or to remain on-site during lunch breaks.

Based on this analysis, the Project would be consistent and not conflict with or obstruct a State or local plan related to renewable energy or energy consumption. Impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant.*

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
3.4.7 - GEOLOGY AND SOILS				
Would the Project:				
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 offsite 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 risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems in areas 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?	☐	☐	☐	☐

Discussion

The following analysis is based primarily on the Geotechnical Investigation Report (Soils Engineering, Inc., 2025), prepared for this Project, attached as Appendix D.

Impact #3.4.7a(i) – Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving – 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?

The site is located within the Gosford Quadrangle and is not located in an Alquist-Priolo Special Studies Zone (Soils Engineering, Inc., 2025). The nearest active fault is the Kern Front Fault, which is approximately five miles to the north. The White Wolf Fault is approximately 15 miles to the southeast. The Pleito Fault is located approximately 24 miles south. The Garlock (West) Fault is approximately 35 miles to the southeast of the site. The San Andreas Fault zone is approximately 35 miles to the west of the site.

The lack of known faults in the vicinity of the Project site notwithstanding, the Project can be subjected to strong ground shaking during an earthquake on a nearby fault. Development of the Project would be subject to review by the DSA and would be required to comply with seismic code requirements under the California Building Code (CBC), with the Project's compliance with applicable CBC standards that will take into account seismic safety standards for structures.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.7a(ii) – Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving – strong seismic ground shaking?

See discussion of Impact #3.4.7a(i) above.

There are no known active earthquake faults or Alquist-Priolo fault zones that traverse the City. However, Southern California is considered to be a seismically active area. Review of the Project by CDE and DSA would ensure that all new construction complies with applicable seismic code requirements under the CBC.

The Project shall adhere to all applicable local and State regulations to reduce any potentially significant impacts to structures resulting from strong seismic ground shaking at the Project site. Therefore, Project impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.7a(iii) – Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving – seismic-related ground failure, including liquefaction?

See discussion of Impact #3.4.7a(i) and (ii) above.

Liquefaction is defined as a phenomenon where earthquake-induced ground vibrations increase the pore pressure in saturated, granular soils until it is equal to the confining, overburdened pressure. When this occurs, the soil can completely lose its shear strength and enter a liquefied state. The possibility of liquefaction is dependent upon grain size, relative density, confining pressure, saturation of the soils, and intensity and duration of ground shaking. In order for liquefaction to occur, three criteria must be met: "low density," coarse-grained (sandy) soils, a groundwater depth of less than about 50 feet, and a potential for seismic shaking from nearby large magnitude earthquakes.

Shallow groundwater was encountered at a depth of 41 feet below ground surface (bgs) in one soil boring, which could indicate perched water. The depth to the unconfined aquifer, as shown on maps prepared by the Kern County Water Agency (KCWA), and DWR water well data presented on the SGMA Data Viewer, was approximately 170 feet bgs in Spring 2012 and 239 feet bgs in Spring 2024. Based on various borings taken at the site, it was determined that the Project has a low potential for liquefaction, given both the soil types and groundwater levels observed through boring samples on the site (Soils Engineering, Inc., 2025).

Based on this analysis, the Project would have a less-than-significant impact, exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. Adherence to all applicable seismic building code requirements under the CBC would reduce or avoid any potential impacts to structures resulting from liquefaction at the Project site, and the impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.7a(iv) – Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving – landslides?

The Project sites are relatively flat with no significant topological features. The Geotechnical Investigative Report notes that there was no evidence of historic landslides or creep observed on the Project site (Soils Engineering, Inc., 2025).

As such, there is no potential for rock falls or landslides to impact the Project in the event of a major earthquake, as the area has no dramatic elevation changes. The Project will not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. Therefore, the Project will have a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant.*

Impact #3.4.7b – Would the Project result in substantial soil erosion or the loss of topsoil?

The Project site and surroundings are mostly flat. Construction activities for the Project would disturb soil and would expose these disturbed areas to erosion by wind and water for a temporary period of time during construction. As the Project is anticipated to disturb more than one acre of land, the Project would be subject to National Pollutant Discharge Elimination System (NPDES) Program requirements. As such, it will have to develop a Stormwater Pollution Prevention Plan (SWPPP). As part of the SWPPP, the Project would be required to implement various types of Best Management Practices (BMPs) to prevent erosion and sedimentation from occurring during construction.

Typical BMPs intended to control erosion include sandbags, silt fencing, swales, street sweeping, etc. The Project is not expected to result in substantial soil erosion or the loss of topsoil with the implementation of the SWPPP and BMPs. Overall, the Project would not result in conditions where substantial surface soils would be exposed to wind and water erosion.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.7c – 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 on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

See discussion in Impact #3.4.7a(iii) and #3.4.7a(iv) above.

There are no slopes on or near the sites, and the Project would not expose the people or structures to significant risks from landslides. The CDE school siting criteria factors referenced in Education Code Section 17251 and Title 5 CCR, Sections 14001 through 14012 specifically require compliance with codes and regulations related to earthquakes, liquefaction, and landslides.

The main causes of land subsidence are tectonic subsidence due to oil and gas fluid extraction activities, as well as groundwater withdrawal and hydrocompaction of moisture-deficient alluvial deposits. As shown in the Kern County General Plan Safety Element, the areas of significant subsidence within the Bakersfield area are shown. The school site is located outside of the area where historic land subsidence has occurred and is outside of the area of hydrocompaction. In addition, the school site is in an area where oil and gas activity is minor, and agricultural activities are not occurring within the vicinity, so groundwater withdrawal appears to be decreasing. Based on this information, it appears that regional subsidence should not be an issue at this site, requiring any special mitigation or requirements (Soils Engineering, Inc., 2025).

Surface soils encountered in our field investigation consisted predominantly of upper layers of loose to medium dense Silty Sands (SM), Poorly Graded Sands (SP), and soft to stiff Sandy Silts in the upper 18 feet bgs. Expansive soils are defined in the 2022 CBC, Section 1803A.5.3. Soils are considered to be expansive when the Expansion Index (EI) result is greater than 20, per ASTM D4829, Expansion Index of Soils. Testing performed on soils found on the Project site showed an EI of 0, which indicates very low potential expansion.

The proposed Project will comply with all CDE and DSA requirements for development in consideration of the existing soil environment. In addition, the City is not in an area that is at high risk for landslides due to the low levels of elevation. Compliance with the existing regulatory framework would be adequate to reduce any potential impacts to less-than-significant levels. Moreover, the Project will be designed by an engineer to resist potential side effects of spreading, subsidence, liquefaction, or collapse. Therefore, the impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.7d – Would the Project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

See discussion in Impact #3.4.7(c). The Project site has a very low probability of expansion. The Project will comply with all applicable requirements of the CDE, DSA, and any pertinent development standards for construction and operation of the facility on the site, including appropriate foundation development. Development of the campus has already occurred and provides evidence that safe development of the site is possible through the appropriate review and permitting.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.7e – Would the Project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems in areas where sewers are not available for the disposal of wastewater?

The proposed Project does not include the use of a septic system. The Project is already connected to the existing City sewer line and sewer system for the disposal of wastewater generated during operations. Therefore, the Project would have no impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be *no impact*.

Impact #3.4.7f – Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The Project site has previously had ground-disturbing activities related to the development of the existing high school. Previous development of the site did not unearth any unique paleontological resource or unique geologic feature. Although unlikely, ground-disturbing activities during construction have the potential to damage or destroy previously undiscovered paleontological resources or unique geologic features.

Implementation of MM GEO-1 would reduce potential impacts to a less-than-significant level by implementing procedures for addressing paleontological resources or unique geologic features should they be unearthed during construction activities. Therefore, with MM GEO-1, the Project will have a less-than-significant impact.

MITIGATION MEASURE(S)

MM GEO-1: If any paleontological resources are encountered during ground-disturbance activities, all work within 25 feet of the find shall halt until a qualified paleontologist, as defined by the Society of Vertebrate Paleontology Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources (2010), can evaluate the find and make recommendations regarding treatment. Paleontological resource materials may include resources such as fossils, plant impressions, or animal tracks preserved in rock. The qualified paleontologist shall contact the Natural History Museum of Los Angeles County or another appropriate facility regarding any discoveries of paleontological resources.

If the qualified paleontologist determines that the discovery represents a potentially significant paleontological resource, additional investigations and fossil recovery may be required to mitigate adverse impacts from Project implementation. If avoidance is not feasible, the paleontological resources shall be evaluated for their significance. If the resources are not significant, avoidance is not necessary. If the resources are significant, they shall be avoided to ensure no adverse effects, or such effects must be mitigated. Construction in that area shall not resume until the resource-appropriate measures are recommended or the materials are determined to be less than significant. If the resource is significant and fossil recovery is the identified form of treatment, then the fossil shall be deposited in an accredited and permanent scientific institution. Copies of all correspondence and reports shall be submitted to the Lead Agency.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant with mitigation incorporated*.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
3.4.8 - GREENHOUSE GAS EMISSIONS				
Would the Project:				
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?	☐	☐	☒	☐

Discussion

The analyses in this section are based on a Small Project Analysis Level (SPAL) prepared for this Project (QK, 2025a), attached as Appendix A.

Impact #3.4.8a – Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

The Project's greenhouse gas (GHG) emissions are primarily from construction equipment source activities and operational mobile and energy sources (Appendix A). Not all GHGs exhibit the same ability to induce climate change; as a result, GHG contributions are commonly quantified as carbon dioxide equivalents (CO2e). The proposed Project's construction and operational CO_2e emissions were estimated using CalEEMod. These emissions are summarized in Table 3.4.8-1.

Table 3.4.8-1
Estimated Annual GHG Emissions (MT/Year)

Source	CO_2	CH_4	N_2O	CO_2e
Total Construction Emissions	580	0.02	0.01	585
Total Operational Emissions	787	0.67	0.04	816

Source: Appendix A

In the decade after SJVAPCD adopted their Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for New Projects under CEQA, several new laws and executive orders were adopted that require additional reductions in years after 2020. For instance, Senate Bill 32 requires that GHG emissions be 40% less than 1990 levels by 2030. More drastic still, Senate Bill 100 requires 100 percent zero-carbon electricity by 2045, and Executive Order B-55-18 commits California to total, economy-wide carbon neutrality by 2045. Clearly, the 2009 Guidance may be somewhat inadequate in producing a meaningful comparison by today's standards, which propose a grand vision that, if achieved, would

fundamentally change how business is conducted and citizens live in the State. Thus, as discussed in the most recent updates to the Scoping Plan, objectives of the Scoping Plan affect all sectors of the economy, and it no longer makes sense to evaluate GHG emissions on a project-level.

For these reasons, the Project GHG emissions levels presented in Table 3.4.8-1, above, are primarily for disclosure purposes. The Project's largest contributors to GHG emissions are from construction activities and operational mobile and energy sources. Electricity and transportation fuels are, in effect, regulated by requiring providers and importers of electricity and fuel to participate in the GHG Cap-and-Trade Program and other Programs (e.g., low carbon fuel standard, renewable portfolio standard, etc.). Each sector-wide program exists within the framework of AB 32 and its descendant laws, the purpose of which is to achieve GHG emissions reductions consistent with the AB 32 Scoping Plan.

The Project would generate GHGs primarily from energy sources and combustion of gasoline/diesel fuels, each of which is regulated near the top of the supply chain. As such, each consumer in California (including those creating emissions of this Project) will have no choice but to purchase energy and fuels produced in a way that is acceptable to the California market. Thus, Project GHG emissions will be consistent with the relevant plan (i.e., AB 32 Scoping Plan). The Project would meet its fair share of the cost to mitigate the cumulative impact of global climate change based on energy purchases from the California market. Thus, consumers of energy and transportation fuels are in effect regulated by higher-level emissions restrictions on the producers of these energy sources. Therefore, the Project would have a less-than-significant impact on applicable GHG reduction plans, and the Project's contribution to cumulative global climate change impacts would not be cumulatively considerable.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.8b – Would the Project conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

See Impact #3.4.8a above. The proposed Project will not exceed the SPAL thresholds established by the SJVAPCD. As discussed above, the Project would have a less-than-significant impact on applicable GHG reduction plans, and the Project's contribution to cumulative global climate change impacts would not be cumulatively considerable because consumers of energy and transportation fuels are in effect regulated by higher-level emissions restrictions on the producers of these energy sources. Therefore, the Project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, and the impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
3.4.9 - HAZARDS AND HAZARDOUS MATERIALS				
Would the Project:				
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 involve handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☒	☐	☐
d. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 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?	☐	☐	☒	☐

Discussion

The analyses in this section are based on a Small Project Analysis Level (SPAL) prepared for this Project (QK, 2025a), attached as Appendix A, and the Geotechnical Investigation Report (Soils Engineering, Inc., 2025), prepared for this Project, attached as Appendix D.

Impact #3.4.9a – Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction of the Project would involve the temporary transport and use of minor quantities of hazardous materials such as fuels, oils, lubricants, hydraulic fluids, paints, and solvents. The types and quantities of hazardous materials to be used and stored on-site would not be of a significant amount to create a reasonably foreseeable upset or accident condition. The handling and transport of all hazardous materials on-site would be performed in accordance with all applicable federal, State, and local laws and regulations. The use of hazardous materials is potentially subject to State reporting requirements if the amount of hazardous materials exceeds a certain threshold. Typically, these reporting thresholds are 55 gallons of a liquid, 500 pounds of a solid, 200 cubic feet of compressed gas, any amount of hazardous waste, and extremely hazardous materials based on federal thresholds. Preparation and submittal of a Hazardous Materials Business Plan (HMBP) is required if any of the above thresholds are exceeded.

Construction

Small amounts of hazardous and non-hazardous materials and wastes would likely be transported to and from the Project site during the construction phase of the proposed Project. Construction would involve the use of some hazardous materials, such as diesel fuel, hydraulic oil, grease, solvents, adhesives, paints, and other petroleum-based products. These materials are commonly used during construction activities and would be removed and disposed of at an appropriate landfill or recycling facility. Workers would likely be trained to properly identify and handle all hazardous materials, following OSHA/CAL-OSHA regulations. Hazardous waste would be either recycled or disposed of at a permitted and licensed treatment and/or disposal facility. Any hazardous waste or debris that is generated during the construction of the proposed Project would be collected and transported away from the site and disposed of at an approved off-site landfill or another such facility. While they are being used during construction, these materials are stored in appropriate storage locations and containers in the manner specified by the manufacturer and disposed of in accordance with local, federal, and State regulations. Therefore, impacts would be less than significant.

Operations

During operation, standard cleaning chemicals for maintenance of the proposed educational buildings are the potential applications of hazardous materials onsite. Employees will comply with all recommended safety procedures in order to prevent and minimize leaks or spills. If applicable, Safety Data Sheets will be posted for each chemical used that will include precautionary statements for each chemical, first aid measures, firefighting measures, accidental release measures, handling and storage, exposure controls, physical and chemical properties, stability and reactivity, disposal considerations, and transport information. The amount of materials used and stored onsite will vary depending on the amount necessary to upkeep the facility. These materials will be stored and handled following the appropriate safety procedures. With the Project's compliance with appropriate storage and handling

practices for specific materials, the Project would not result in significant hazards to the public or environment, and reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant.*

Impact #3.4.9b – 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?

See the discussion on Impact #3.4.9a above.

The Project site is not within an active oil or gas field, and the closest oil wells drilled near the Project site are over 1,350 feet from the site. It is unlikely that oil field activities have impacted the subsurface soil or soil gas beneath the subject site with chemicals of concern (methane, H2S, etc.) (Soils Engineering, Inc., 2025).

Considering that VCHS was constructed in 1967, there is a likelihood that the school may have been painted with lead-based paint and constructed with materials that contain asbestos (Center for Disease Control, 2025; United States Environmental Protection Agency, 2024). Therefore, as required by MM HAZ-1, prior to demolition of any structures, all of the potentially asbestos-containing material in the structures to be demolished must be tested/surveyed for asbestos and lead content. If positive results are found, an Asbestos Notification will be submitted to the SJVAPCD, fees will be paid pursuant to Rule 3050, and any necessary abatement activities will be completed. The Project would also comply with relevant school siting criteria factors referenced in Education Code Section 17251 and Title 5 CCR, Sections 14001 through 14012.

Consequently, it is not expected that the Project would 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. Therefore, with the implementation of MM HAZ-1, the Project impacts would be less than significant.

MITIGATION MEASURE(S)

MM HAZ-1: Prior to the start of the demolition of any existing structures on the Project site, an assessment of the existing buildings shall be performed by a certified asbestos consultant, notification shall be submitted to the San Joaquin Valley Air Pollution Control District, and any abatement requirements shall be completed in order to obtain an approved demolition permit.

If no regulated asbestos is found during the assessment, no further action is necessary.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant with mitigation incorporated.*

Impact #3.4.9c – Would the Project emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

See Impacts #3.4.9a and b above.

The Project site is adjacent to McKinley Elementary School and Emerson Middle School, and the Project itself is a high school. Construction activities of the proposed Project will result in the temporary use of hazardous materials and or substances, such as lubricant and diesel fuel, during construction. Exhaust from construction and related activities is expected to be minimal and would not create a significant impact. As noted in Impact #3.4.8a-b, the proposed Project's construction and operational CO_2e emissions were estimated to be minimal. Based on the predicted operational emissions and activity types, the proposed Project is not expected to affect any on-site or off-site sensitive receptors and is not expected to have any adverse impacts on any known sensitive receptors (QK, 2025a).

Projects are considered for potential health risks wherein a new or modified source of Hazardous Air Pollutants (HAPs) is proposed for a location near an existing residential area or other sensitive receptor when evaluating potential impacts related to HAPs.

The proposed Project would result in emissions of HAPs during construction and would be located near existing residents; therefore, an assessment of the potential risk to the population attributable to emissions of hazardous air pollutants from the proposed Project is required.

Risk reports were generated using the derived OEHHA analysis method for carcinogenic risk and non-carcinogenic chronic and acute risk. Site parameters are included in the HARP2 output files. Total cancer risk was predicted for the inhalation pathway at each receptor. A hazard index was computed for chronic non-cancer health effects for each applicable endpoint and each receptor. A hazard index for acute non-cancer health effects was not computed since Diesel Particulate Matter (DPM) does not have a risk exposure level for acute risk.

SJVAPCD has set the level of significance for carcinogenic risk at twenty in one million, which is understood as the possibility of causing 20 additional cancer cases in a population of one million people. The level of significance for chronic non-cancer risk is a hazard index of 1.0. All receptors were modeled with a three-year exposure to construction activities.

The carcinogenic risk and the health hazard index (HI) for chronic non-cancer risk at the point of maximum impact (PMI) do not exceed the significance levels of twenty in one million

(20 x 10-6) and 1.0, respectively, for the proposed Project. The PMIs are identified by receptor location and risk and are provided in Table 3.4.9-1.

Table 3.4.9-1
Potential Maximum Impacts Predicted by HARP

	Cancer Risk	Chronic Hazard Index
Total Construction	11.8E-06	6.88E-03
SJVAPCD Threshold	20.0E-06	1.0
Exceedance?	No	No
Receptor #	6	6
UTM Easting (m)	317481.98	317481.98
UTM Northing (m)	3914457.97	3914457.97

Source: Appendix A; Note: UTM = Universal Transverse Mercator

As shown above in Table 3.4.9-1, the maximum predicted cancer risk for the proposed Project is 11.8E-06. The maximum chronic non-cancer hazard index for the proposed Project is 6.88E-03. Since the PMI remained below the significance threshold for cancer and chronic risk, this Project would not have an adverse effect to any of the surrounding communities.

The potential health risk attributable to the proposed Project is determined to be less than significant based on the following conclusions:

- Potential carcinogenic risk from the proposed Project is below the significance level of ten in a million at each of the modeled receptors.
- The hazard index for the potential chronic non-cancer risk from the proposed Project is below the significance level of 1.0 at each of the modeled receptors.
- The hazard index for the potential acute non-cancer risk was not calculated since there is no acute risk associated with DPM emission; therefore, the proposed Project is considered below the significance level.

Therefore, the potential risk to the population attributable to emissions of HAPs from the proposed Project would be less than significant.

As discussed in Impact #3.4.9(b), MM HAZ-1 requires testing for asbestos and lead content in all buildings that will be demolished. With implementation of MM HAZ-1, impacts related to hazardous materials to schools within two miles of the Project would be less than significant.

MITIGATION MEASURE(S)

Implementation of MM HAZ-1.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant with mitigation incorporated.*

Impact #3.4.9d – Would the Project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Education Code Section 17251 and Title 5 CCR, Sections 14001 through 14012 state that a school cannot be sited within 1,500 feet of an above-ground or underground fuel storage tank (propane tank).

An online search was conducted to identify hazardous waste locations within 1,500 feet of the Project site. The search indicated that there are no hazardous or toxic sites within the Project site or within a half mile of the Project site (EnviroStor, 2025). Available data also indicates there are no leaking underground storage tank (LUST) cleanup sites on the Project site (GeoTracker, 2025). There are two cases with a closed status for LUSTs located approximately 800 feet and 1400 feet from the existing school site. These sites do not constitute a danger to the school or students, and therefore, the impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant.*

Impact #3.4.9e – 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?

Education Code Section 17251 and the CCR, Title 5, Sections 14001 through 14012 state that a proposed school site should not be within two miles of the center line of an airport runway, pursuant to Education Code Section 17215.

The Bakersfield Municipal Airport is approximately 1.70 miles south of the Project Site and 1.90 miles from the centerline of the runway. The Project site is not located within an identified Airport Compatibility Zone, as identified in the Kern County Airport Land Use Compatibility Plan (ALCUP) (County of Kern, 2012). The Project site was previously determined to be consistent with the pertinent education and building codes, and therefore, would not result in a safety hazard or excessive noise for people working in the Project area, and impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.9f – Would the Project impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?

The 2022 Kern County Emergency Operations Plan (EOP) establishes an emergency management organization and assigns functions and tasks consistent with California's Standardized Emergency Management System and the National Incident Management System. The EOP includes goals and a framework for implementing effective emergency response (County of Kern, 2022). Additionally, the District has an approved Emergency Preparedness and School Safety Plan (School Safety Plan), conducts routine emergency drills and has a comprehensive safety inspection process that is implemented throughout the school year (Kern High School District, 2025)

The Project will comply with all local regulations as stated in the EOP and School Safety Plan. The Project would also comply with the appropriate local and State requirements regarding emergency response plans and access. The proposed Project would not inhibit the ability of local roadways to continue to accommodate emergency response and evacuation activities. Therefore, the Project would have a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant.*

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
3.4.10 - HYDROLOGY AND WATER QUALITY				
Would the Project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface 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 of amount of surface runoff in a manner which would result 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 flows?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Discussion

Impact #3.4.10a – Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface water quality?

See discussion in Impact #3.4.7b.

The proposed Project construction and groundbreaking activities have the potential to cause erosion, sedimentation, and discharge of construction debris from the Project site. Clearing of vegetation and grading activities, for example, could lead to exposed or stockpiled soils susceptible to peak stormwater runoff flows. Also, the compaction of soils by heavy equipment may minimally reduce the infiltration capacity of soils (exposed during construction) and increase runoff and erosion potential.

Demolition activities and the presence of significant amounts of raw materials for construction, including concrete, asphalt, slurry, materials that could potentially contaminate the construction area, or spill or leak, include lead-based paint flakes, diesel fuel, gasoline, lubrication oil, hydraulic fluid, antifreeze, transmission fluid, lubricating grease, and other fluids, which may lead to stormwater runoff contamination. If uncontrolled, these materials could lead to water quality problems, including sediment-laden runoff, prohibited non-stormwater discharges, and ultimately the degradation of downstream receiving water bodies. Implementing SWPPP BMPs for construction activities, such as the use of straw waddle sandbags, silt fencing, swales, street sweeping, etc., will be implemented and would reduce stormwater runoff to a less-than-significant impact during construction activities.

As proposed, the Project will require grading or other ground-disturbance activities that could cause soil erosion or sedimentation that has the potential to degrade water surface quality. The potential for issues related to soil erosion or contaminated runoff is unlikely with implementation of standard BMPs. Additionally, the Project site is already developed as a school site and contains stormwater retention improvements. The Project proposes to demolish and rebuild an existing school site to improve site design and provide students with modern amenities, and would involve additional drainage improvements to accommodate the facility. These improvements are subject to review by the CDE and DSA for approval. The Project's surface and groundwater quality impacts are expected to be less than significant as a result of the Project.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be ***less than significant.***

Impact #3.4.10b – 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?

The Project site is located within the service area boundary of the California Water Service, Bakersfield District (Cal Water). Cal Water produces roughly 53 million gallons of water daily from local groundwater, surface water from the Kern River, and State Water Project water purchased from the Kern County Water Agency (California Water Service, 2021). The District is situated in the Tulare Lake Hydrologic Region within the Kern Valley Floor Rivers sub-area. The Bakersfield District falls within the jurisdiction of the Kings River Groundwater Sustainability Agency (KRGSA), the Kern Groundwater Authority Groundwater Sustainability Agency (KGA GSA), and the Olcese Groundwater Sustainability Agency (GSA). Projects and management actions to support the achievement of the Basin's sustainability goal are proposed by the GSAs and documented in their respective Groundwater Sustainability Plan (GSP). As the Project site falls under the jurisdiction of the Cal Water, Bakersfield District, compliance with Cal Water rules and regulations for water use would, by extension, be compliant with the applicable GSP.

The Project site is located in an urbanized area and is currently operating as a high school, and is connected to the Bakersfield City water system. The student population was 210 in 2024 and will increase to 440 students, and up to five additional staff. However, the increase in the student and faculty population will occur over time and not immediately after construction is complete. Therefore, it is not anticipated that a significant increase in water demand would result from the Project. Additionally, the school will implement current energy and water-efficient appliances, fixtures such as low-flow toilets, faucets, etc., as well as drought-tolerant landscape plantings, water-efficient landscape irrigation, and recreational field maintenance. Furthermore, the construction of school sites is regulated by the CDE and DSA. Compliance with adopted CBC requirements and regulations would reduce the impact on water supplies. Therefore, the Project would have a less-than-significant impact.

Reconstruction of new campus buildings and reconfiguration of various ballfields will nominally shift the amount of impervious surfaces; nevertheless, approximately 60 percent of the property will still remain open and undeveloped as pervious surfaces after buildout is complete. The significant amount of pervious surfaces will allow for groundwater recharge and potentially less sediment runoff. Therefore, the impacts of the Project will be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.10c(i) –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 or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?

As noted in Impact #3.4.4(c), there are no streams, rivers, or other water features found on the Project site. The Kern Island canal is located south and east of the Project site; however, the canal will not be impacted by the construction or operation of the Project.

The disturbance of soils on-site during construction that could cause erosion is minimal but may result in temporary construction impacts.

See discussion in Impact #3.4.10a and #3.4.10b. The Project will implement SWPPP standards and BMPs to reduce the potential for any runoff during construction. Therefore, the Project will have a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be a ***less-than-significant impact***.

Impact #3.4.10c(ii) – 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 or through the addition of impervious surfaces, in a manner which would substantially increase the rate of amount of surface runoff in a manner which would result flooding on- or off-site?

See also Impact #3.4.10a and #3.4.10b above. The site is currently developed with an existing high school campus, and grading will be minimal and will not substantially change the drainage pattern on the site. Furthermore, it was concluded that soil types on the Project site are conducive for absorption, as well as recommendations for the District to adhere to a maintenance program to ensure that sediment does not collect onsite after buildout (Soils Engineering, Inc., 2025). The Project would not cause substantial surface runoff that would result in flooding on- or off-site. Therefore, with mitigation, the Project would have a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be ***less than significant.***

Impact #3.4.10c(iii) – 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 or through the addition of impervious surfaces, in a manner which would 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?

Please see Impacts #3.4.10a through c(i-ii) above. Furthermore, CDE regulation §14030(e)(2) requires that Districts verify that site layouts are designed in a manner that allows utilities, such as stormwater, to accommodate anticipated growth.

The Project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site, contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems, nor provide additional sources of polluted runoff. Therefore, the Project would have a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be ***less than significant.***

Impact #3.4.10c(iv) – 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 or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?

See discussion in Impact #3.4.10c(i-iii).

Therefore, the Project will have a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be ***less than significant.***

Impact #3.4.10d – Would the Project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?

The Project site is not located near the ocean or a steep topographic feature (i.e., mountain, hill, bluff, etc.). Tsunamis are waves generated in oceans from seismic activity. Due to the inland location of the site, tsunamis are not considered a hazard for the site. Therefore, there is no potential for the site to be inundated by a tsunami or mudflow.

A seiche is a wave generated by the periodic oscillation of a body of water whose period is a function of the resonant characteristics of the containing basin as controlled by its physical dimensions. The Project site is not adjacent to a large body of water that would be vulnerable to the development of a seiche.

The Kern County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) identifies dams and levees throughout Kern County and their potential hazard classification. Kern County MJHMP indicates dam inundation exposure in the event of the failure of Lake Isabella dam (Kern County, 2020). The Project site is located inside the inundation exposure zone. It will take approximately six to eight hours for a foot of water to reach the site, and the peak inundation depth is predicted to be 10 to 20 feet if the dam fails. The threat of a dam break has lessened considerably from these values above since the dam has been recently repaired and improved by the US Army Corps of Engineers (Soils Engineering, Inc., 2025).

The Project and its proponents are expected to comply with regulations and instructions laid out in the Kern County MJHMP. Additionally, as noted, the Project is anticipated to prepare and comply with State standards related to the HMBP, which establishes procedures to follow to address storage and accidental spills. Therefore, with these considerations, although the Project is located within a potential dam failure inundation area, the impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.10e – Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

See the response to Impact #3.4.10b above.

The Project will comply with all applicable State standards during construction and operation. This Project is not anticipated to use or substantially deplete groundwater supplies or conflict with any future adopted groundwater management plan. Therefore, this Project will have a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
3.4.11 - LAND USE AND PLANNING					
Would the Project:					
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?	☐	☐	☒	☐

Discussion

Impact #3.4.11a – Would the Project physically divide an established community?

The Project proposes to further develop an existing school site and would not expand outside of the campus parcel boundaries. The Project site is surrounded by other existing educational facilities or residences and is bounded on one side by the Kern Island canal. The proposed Project would not create a division between any established communities. The proposed Project would not physically divide an established community. Therefore, the Project will have no impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be ***no impact***.

Impact #3.4.11b – 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?

As discussed, the Project site contains the existing Vista Continuation High School campus. As a project proposed by a special district, the Project does not fall under the jurisdiction of the City of Bakersfield Zoning Ordinance or the MBGP and therefore is not subject to local land use regulations Additionally, Government Code Section 53091 does not require a school

district to comply with county land use designations, and therefore, the District is not seeking a General Plan Amendment or zone change for the subject site.

The development or renovations to the campus are under the purview of the CDE, with designs of the facility reviewed and approved by the DSA. As noted above, the District is not regulated by the Bakersfield General Plan or Municipal Code. Therefore, the Project would have a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant.*

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact

3.4.12 - MINERAL RESOURCES

Would the Project:

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?	☐	☐	☒	☐

Discussion

Impact #3.4.12a – 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?

The California Department of Conservation, Geological Survey classifies lands into Aggregate and Mineral Resource Zones (MRZs) based on guidelines adopted by the California State Mining and Geology Board, as mandated by the Surface Mining and Reclamation Act of 1974. These MRZs identify whether known or inferred significant mineral resources are present in areas. Lead agencies are required to incorporate identified MRZs resource areas delineated by the State into their General Plans. The State has identified mineral resource zones within the City of Bakersfield planning area but did not identify any mineral resource zones within the Project area (California Geological Survey, 2009). The City's General Plan and zone ordinance does not indicate this property to be a mineral.

Additionally, the Project is not sited within a known oil/gas field and does not contain a mineral or gas exploration/extraction operation (California Department of Conservation, Geologic Energy Management Division, 2025).

The proposed 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. Therefore, impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be ***less than significant.***

Impact #3.4.12b – 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?

See Impact #3.4.12a. The proposed Project is not designated as a mineral recovery area. The Project would not alter any existing plans that protect mineral resources. As a result, the proposed Project would not interfere with known mining operations, but would not result in the loss of land designated for mineral and petroleum.

The proposed Project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. Therefore, impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be ***less than significant.***

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
3.4.13 - NOISE				
Would the Project result in:				
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 a local general plan or noise ordinance or applicable standards of other agencies?	☐	☐	☒	☐
b. Generation of excessive ground-borne vibration or ground-borne 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?	☐	☐	☐	☒

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Discussion

Impact #3.4.13a – 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 a local general plan or noise ordinance or applicable standards of other agencies?

Title 5 CCR mandates that new school buildings be designed to minimize noise interference with the educational program, which includes requirements for background noise levels in classrooms and insulation from outdoor noise sources. Specifically, unoccupied, furnished classrooms must have a maximum background noise level of 45 dBA and a maximum reverberation time of 0.6 to 0.7 seconds, depending on room volume. School sites also cannot be located near roads with noise levels that could adversely affect the educational program. The CDE also states that new schools must be built with acoustical designs to protect against external noise, particularly in areas with high outdoor noise exposure.

Education Code Section 17251 and Title 5 CCR, Sections 14001 through 14012, consider if a potential school site near a freeway or other source of noise and recommends that an acoustical engineer be hired to determine the level of sound that location is subjected to and to assist in designing the school should that site be chosen. The closest freeway is SR 58, located approximately 1000 feet south of the project site. Given that this is an existing school

site that is not located near a freeway, the project is compliant with Education Code Section 17251 siting criteria.

Noise levels from school activities would be intermittent and mostly occur during periods when students are arriving at school in the morning or leaving school in the afternoon, and during periods of recess or physical education classes on the play fields. The noise levels generated by such activities would occasionally be audible in the existing residential areas to the south, east, and west, but would not exceed the County's 65 decibel (dB) CNEL standard. Additionally, nearby existing sensitive uses could be affected by noise and vibration during the construction of the project.

The Project proposes the construction and reconfiguration of the existing VCHS campus. Use of a localized sound system during ballfield events would not exceed the noise levels that are already generated at the existing high school campus, as the number of ballfields is not changing as a result of this Project. Although the student population is expected to increase to 440 students, the increase would not create a significant increase in noise levels that already exist at the existing campus and would comply with applicable noise level standards, including the Bakersfield Metropolitan General Plan Noise Element.

As indicated in the foregoing discussion of the project's noise impacts, because the project would generate noise levels below standards established in the Metropolitan Bakersfield General Plan or noise ordinance, and applicable standards of other agencies, its permanent increase in ambient noise levels in the project vicinity and temporary or periodic increases in ambient noise levels in the project vicinity would not be considered substantial. Therefore, the project would have a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.13b – Would the Project result in generation of excessive ground-borne vibration or ground-borne noise levels?

Construction

Construction activities, in general, can have the potential to create ground-borne noise that can manifest into ground-borne vibrations. It is unlikely that any blasting or pile-driving would be required in connection with the construction of the Project. Construction activities most likely to cause ground-borne vibration include heavy construction equipment. Therefore, the potential for ground-borne vibrations to occur as part of the construction of the Project is considered minimal.

The Federal Transit Administration (FTA) has published standard vibration velocities for construction equipment operations (U.S. Department of Transportation, 2017). In general, the FTA architectural damage criterion for continuous vibrations (i.e., 0.2 inch/second) appears to be conservative even for sustained pile driving. Building damage can be cosmetic or structural. Ordinary buildings that are not particularly fragile would not experience any cosmetic damage (e.g., plaster cracks) at distances beyond 30 feet. This distance can vary substantially depending on the soil composition and the underground geological layer between the vibration source and receiver. In addition, not all buildings respond similarly to vibration generated by construction equipment. The typical vibration produced by construction equipment is illustrated in Table 3.4.13-1.

Table 3.4.13-1
Typical Vibration Levels for Construction Equipment

Equipment	Reference peak particle velocity at 25 feet (inches/second)[1]	Approximate peak particle velocity at 100 feet (inches/second)[2]
Loaded trucks	0.076	0.010
Vibratory compactor/roller	0.210	0.026

Notes:
1 – Federal Transit Administration, Transit Noise and Vibration Impact Assessment Guidelines, May 2006. Table 12-2.
2 – Calculated using the following formula:
$PPV_{equip} = PPVref \times (25/D)1.5$
where: PPV (equip) = the peak particle velocity in inches/second of the equipment adjusted for the distance PPV (ref) = the reference vibration level in inches/second from Table 12-2 of the FTA Transit Noise and Vibration Impact Assessment Guidelines
D = The distance from the equipment to the receiver

As indicated in Table 3.4.13-1, based on the FTA data, vibration velocities from typical heavy construction equipment that would be used during Project construction range from 0.076 to 0.210 inch-per-second peak particle velocity (PPV) at 25 feet from the source of activity. The closest sensitive receptors are existing adjacent single-family residences to the north and east of the Project site. With regard to the proposed Project, ground-borne vibration would be generated during site clearing and grading activities on-site, facilitated by the implementation of the proposed Project. It should be noted that 0.2 inch-per-second PPV is a conservative threshold, as that is the construction vibration damage criterion for non-engineered timber and masonry buildings. Buildings within the Project area would be better represented by the 0.5 inch-per-second PPV significance threshold (construction vibration damage criteria for reinforced concrete, steel, or timber buildings). Therefore, vibration impacts associated with construction are anticipated to be less than significant.

Operation

Once constructed, the Project would not result in any activities that would create ground-borne vibrations. Thus, the proposed Project would not result in the exposure of persons to

sensitive receptors or generate excessive ground-borne vibration or ground-borne noise levels. Therefore, the Project would have a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.13c – 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?

See discussion in Impact #3.4.9e.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be *no impact*.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
3.4.14 - POPULATION AND HOUSING				
Would the Project				
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?	☐	☐	☐	☒

Discussion

Impact #3.4.14a – 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)?

Students who attend VCHS reside throughout the City of Bakersfield and are not restricted from attending VCHS based on where they reside in the City. Considering that current and future students are likely already in attendance at an existing middle school or high school in the City, the increase in student population as a result of this Project would not lead to an increase in population in directly adjacent neighborhoods nor in the City itself. Furthermore, the student population will not increase to full capacity at buildout, and the student population will grow over time as the District places students at VCHS. The proposed Project would not induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through the extension of roads or other infrastructure). The Project would not introduce new housing or infrastructure. Therefore, there would be less-than-significant impacts associated with the Project.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant.*

Impact #3.4.14b – Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

See Impact# 3.4.14a above.

Any construction needed for the Project would likely be done by existing City employees or construction workers residing in the City or the surrounding area, which would not require new housing. The Project sites will not displace existing people or housing, necessitating the construction of replacement housing elsewhere. Therefore, the Project would have no impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be *no impact*.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
3.4.15 - PUBLIC SERVICES				
Would the Project:				
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 to other performance objectives for any of the public services:				
(i) Fire protection?	☐	☐	☒	☐
(ii) Police protection?	☐	☐	☒	☐
(iii) Schools?	☐	☐	☒	☐
(iv) Parks?	☐	☐	☐	☒
(v) Other public facilities?	☐	☐	☒	☐

Discussion

Impact #3.4.15a(i) – 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 to other performance objectives for any of the public services - Fire Protection?

Fire protection for the Project is provided by the Bakersfield Fire Department or Kern County Fire Department for fire suppression and emergency medical services. Bakersfield Fire Department's Station 6 is located approximately 0.30 miles southeast of the Project site, and the Kern County Fire Station 41 is located 2.5 miles east of the Project site.

Design plans for the construction of the Project are reviewed and approved by the State Fire Marshall and must adhere to Title 5 codes and regulations, which promote the life, health, and safety of occupants and first responders. Furthermore, updated construction design and the fire retardant materials used to construct the new buildings would provide enhanced fire safety features compared to older buildings. The construction and operation of the proposed

Project are not expected to increase the risk of fires on and adjacent to the Project site. The Project does not propose to generate physical impacts associated with the provision of new or physically altered governmental facilities, the 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. Therefore, the impact would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be ***less than significant.***

Impact #3.4.15a(ii) – 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 to other performance objectives for any of the public services – Police Protection?

The Bakersfield Police Department provides law enforcement services to the City of Bakersfield. The closest Bakersfield Police Department is approximately 0.5 miles northeast of the Project site. The District also has security officers at the campus as well.

The Project will not increase the local population and is not expected to result in significant environmental impacts related to acceptable service ratios, response times, or other performance objectives of police protection services. Therefore, impacts related to police protection would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be ***less than significant.***

Impact #3.4.15a(iii) – 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 to other performance objectives for any of the public services – Schools?

See discussion in Impact #3.4.14a.

The Project is under the jurisdiction of the District, which includes 19 high school facilities, five continuation schools, Bakersfield Adult School, two career technical education facilities, and several special education facilities that serve the greater Bakersfield area. VCHS is one of five continuation high schools in the District and one of three in the City of Bakersfield.

The Project will not increase the overall student population in the District, as explained in Impact #3.4.14a. The purpose of the Project is to enhance the learning experience and offer new and modern amenities for the student population and faculty, and improve the overall use of the existing property. Therefore, the Project will have a less-than-significant impact on the local school district in terms of service ratios, response times, or other performance objectives.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be ***less than significant.***

Impact #3.4.15a(iv) – 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 to other performance objectives for any of the public services – Parks?

See discussion in Impact #3.4.14a.

The proposed Project includes an on-site ballfield and other recreational areas as appropriate for the students and will provide increased recreational opportunities for the neighboring community. The proposed Project would not increase the use of existing neighborhood and regional parks or other recreational facilities to the extent that substantial physical deterioration of the facilities would occur, be accelerated, or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment. Therefore, the Project would have no impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be ***no impact.***

Impact #3.4.15a(v) – 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 to other performance objectives for any of the public services – Other Public Facilities?

See Impact #3.4.15a above.

The Project includes a library within the classroom building, which will provide library services to the student population, which could decrease or eliminate the need for students to use City libraries.

As discussed in Impact #3.4.14a, the student population of the District will not substantially increase as a result of this Project, and the purpose of this Project is to provide improved services for the students at VCHS. Therefore, the Project will not induce the appreciable use of other public facilities such as libraries, courts, and other City and County services.

Therefore, the Project will have a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be ***less than significant.***

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
3.4.16 - RECREATION				
Would the Project:				
a. 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. Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☒	☐

Discussion

Impact #3.4.16a – 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?

See discussion in Impact #3.4.15a(iv).

The Project proposes to develop new recreational facilities for the student population, such as a gymnasium and outdoor basketball courts, and the use of three existing ballfields on the high school campus for recreation. Therefore, recreational needs of the current and future student population will be met largely through on-campus amenities, not leading to impacts on neighborhood and regional parks. There will not be physical deterioration of the facilities, and the Project will not require the construction or expansion of recreational facilities. Therefore, the Project would have a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant.*

Impact #3.4.16b – Would the Project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?

See Impact #3.4.16a above.

The Project would not include recreational facilities or require the construction or expansion of recreational facilities that would have any adverse physical effect on the environment. There would be a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be ***less than significant.***

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
3.4.17 - TRANSPORTATION					
Would the Project:					
a.	Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b.	Conflict or be inconsistent with CEQA Guidelines section 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?	☐	☐	☒	☐

Discussion

Impact #3.4.17a – Would the Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Project Circulation Design

Education Code Section 17251 and Title 5 CCR, Sections 14001 through 14012 require school sites to be located more than 1,500 feet from a railroad, are designed to allow for safe traffic maneuvering and allow for safe routes to school.

There are no railroads within 1,500 feet of the Project site. Maneuvering and safe routes to school are addressed below.

The existing roadways providing the main circulation in the vicinity of the Project include the following as designated by the City of Bakersfield (City of Bakersfield, 2025):

- SR 58 is a highway and serves as one of the main east/west thoroughfares that eventually connects to SR 99, which serves as the main north/south thoroughfare in Bakersfield.
- SR 204 is a highway that also serves as a main north/south thoroughfare that eventually connects to SR 58 to the south and SR 178 to the north.

- The Project has direct ingress/egress from P Street, which is a three-lane collector street with sidewalks, curb, gutter, and a middle turning lane.
- North of the Project site is 4th Street, which is a three-lane collector street with sidewalks, curb, gutter, and a middle turning lane.
- South of the Project site is Brundage Lane, which is a four-laned arterial street with sidewalks, curb, and gutter.

The proposed Project does not require or propose the construction of a new City street and will be served by the same City streets serving the existing school. Construction activities are estimated to take approximately 12 to 18 months and would occur generally during daytime hours, Monday through Friday. Construction activities would be conducted with varying levels of personnel and equipment. Trips associated with construction would be temporary and would be distributed over longer AM and PM periods. Therefore, trips associated with the construction of the Project are anticipated to result in a less-than-significant impact.

Currently, buses dropping students off at Vista Continuation High School must use an internal roadway that reaches far back into the Project site, has a turning radius that is inefficient for dropping students off, and utilizes vehicle maneuvering space that staff and visitor parking would use to safely enter or exit vehicle parking spaces. This can lead to congestion on the school site and City collector roads, delayed responses for emergency personnel, and add a risk of collision internally from different modes of transportation sharing maneuvering spaces simultaneously. As part of the modernization efforts, the school's internal road network will be reconfigured to allow for a dedicated bus drop-off lane on the western boundary of the Project site that would allow for efficient drop-off and ingress/egress from P Street, as shown in Figure 1-3. The Project also proposes the development of a separate internal two-lane roadway for staff, visitors, and emergency response vehicles that follows the northern, eastern, and southern Project boundaries, with parking exclusively along the western boundary, which will allow for both modes of transportation to have safer and more efficient maneuvering on site. Furthermore, the proposed Project will comply with California Building Code Section 11B through 206 regarding accessible routes. The new design allows for more protected and accessible routes for pedestrians entering or exiting the school site, compared to the current design.

The student enrollment at VCHS was 210 students in 2024. While the Project will increase the student population to approximately 440 students and up to five additional staff, the increase in the student and faculty population will occur over time and not immediately after construction is complete. Based on the current student population, it is anticipated that approximately 53 percent of students will be bused to the school, while the remaining 47 percent will be driven and dropped off, will drive their own vehicles, or will walk to school each day. Students who attend VCHS are likely already in the District's school system and would be commuting via bus or vehicles regardless of this Project's implementation. Given this, the traffic generated after the Project completion would be less than significant compared to the existing baseline currently generated by the school.

Events held at the proposed facility would be seasonal in nature and would likely utilize a separate ingress/egress on the southern portion of the eastern Project boundary, including

parking near the ballfields, which would not have a significant impact on everyday circulation patterns.

By reconfiguring VCHS's internal circulation design, the Project is consistent the goals to reduce or eliminate any traffic impacts from the school that it may currently be exhibiting to nearby collector and arterial City streets. Therefore, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and would result in a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be ***less than significant.***

Impact #3.4.17b – Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Guidelines for assessing Project VMT as part of a transportation impact analysis under CEQA Office of Planning and Research (OPR) contain recommendations regarding VMT assessment, significance thresholds, and mitigation measures. Many lead agencies conduct VMT analyses for land development projects pursuant to the Office of Planning and Research (OPR) Technical Advisory (OPR TA) or have adopted their own VMT analysis methodologies based on the advisory recommendations. To date, the City has not yet formally adopted its transportation significance thresholds or its transportation impact analysis procedures.

The Project is the modernization of an existing high school. Because this is a continuation high school, students come to this school from all over Bakersfield, although some of the students are from the surrounding area. Similarly, the majority of faculty and staff are currently serving the school. This population is considered baseline, and the nominal increase in new students and faculty over time will not significantly increase VMT impacts.

Importantly, the Project meets the criteria for use of a *Small Project Analysis Leve*l assessment, as noted in Impact 3.4.3 *Air Quality*. (SPAL). By using a SPAL, the SJVAPCD already anticipates that emissions of criteria pollutants and GHG will be at less than significant levels. As shown in Table 3.4.3-3, operational levels of criteria pollutant emissions are well below SJVAPCD thresholds. Additionally, GHG levels, as shown in Impact #3.4.8 *Greenhouse Gases*, Table 3.4.8-1, are also well below thresholds. Because GHG is directly connected to VMT, it can be determined that VMT impacts related to the Project are less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.17c – 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)?

The Project will be designed to current local and CDE standards and safety regulations. No new roadways are proposed. The proposed school will be accessed off of P Avenue and will allow for the safe movement of vehicles during student drop-off and pick-up times. The Project will not include any changes to any design features that could create a hazard. The purpose of the Project is to redesign internal circulation roadways to reduce hazards due to the school site's current design. Therefore, the Project will have a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant.*

Impact #3.4.17d – Would the Project result in inadequate emergency access?

As noted in Impact #3.4.9f, the county and the District have adopted EOP includes goals and a framework for implementing effective emergency response that includes appropriate methods of access for first responders.

The State Fire Marshall and local city fire codes and regulations establish standards by which emergency access may be determined. The proposed Project would have to provide adequate unobstructed space for fire trucks to turn around. The proposed Project site would have adequate internal circulation capacity, including entrance and exit routes, to provide adequate unobstructed space for the fire trucks and other emergency vehicles to gain access and to turn around.

The proposed Project would not inhibit the ability of local roadways to continue to accommodate emergency response and evacuation activities. The proposed Project would not interfere with the District's established emergency response plan.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be ***less than significant.***

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
3.4.18 - TRIBAL CULTURAL RESOURCES				
Would the Project:				
a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the Lead Agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Discussion

The discussion below is based on the Cultural Resources Technical Memo completed for the Project, attached as Appendix C (QK, 2025c).

Impact #3.4.18a(i) – Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 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 – 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)?

See the discussion presented in Section 3.4.5 - *Cultural Resources,* Impacts #3.4.5a through #3.4.5c.

On August 1, 2025, pursuant to Public Resources Code §21080.3.1 and Government Code §65300 et seq, Assembly Bill 52, letters were sent to each of the Native American tribes within the geographic area as identified by the NAHC (see Appendix C). The letters included a Project description and location maps. Tribal consultation under AB 52 closed on August 31, 2025. To date, no other Tribes have responded.

Upon any ground-breaking activity, there is the possibility of uncovering an object of cultural value. Mitigation Measures MM CUL-1 and MM CUL-2 must be implemented if any artifacts or human remains are discovered. Therefore, the Project would have a less-than-significant impact with mitigation incorporated.

MITIGATION MEASURE(S)

Implementation of Mitigation Measures MM CUL-1 and MM CUL-2.

LEVEL OF SIGNIFICANCE

There would be a ***less-than-significant impact with mitigation incorporated***.

Impact #3.4.18a(ii) – Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 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 – 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the Lead Agency shall consider the significance of the resource to a California Native American tribe.

See discussion for Impacts #3.4.5a through #3.4.5c and Impact #3.4.18a(i) above.

MITIGATION MEASURE(S)

Implementation of Mitigation Measures MM CUL-1 and MM CUL-2.

LEVEL OF SIGNIFICANCE

There would be ***less-than-significant impact with mitigation incorporated***.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
3.4.19 - UTILITIES AND SERVICE SYSTEMS				
Would the Project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater 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 wastewater treatment provider that 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?	☐	☐	☒	☐

Discussion

Impact #3.4.19a – Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

The Project proposes to modernize the existing VCHS campus by reconfiguring campus elements. The reconfiguration consists largely of constructing new buildings on the upper northwestern portion of the Project site and reconfiguring three existing ballfields in the remaining portions of the Project site. The construction of the new buildings and ballfield may require the relocation of water, wastewater, stormwater drainage, electric power,

natural gas, or telecommunications facilities internally on the Project site, but no new connections or expansions would occur beyond what is already on the existing campus. Furthermore, the Project must comply with CDE and DSA requirements for construction. Therefore, the Project would have a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be ***less than significant.***

Impact #3.4.19b – Would the Project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?

See also Impact #3.4.10b.

As discussed, the Project site falls within the service boundary of Cal Water, Bakersfield District. The applicable GSP would ensure sustainable groundwater supply goals are met through implementation of conservation efforts and water management projects. With consideration of the efforts for water conservation and groundwater recharge, in addition to compliance with applicable State and GSP requirements, the Project implementation would not significantly impact current and future potable water demands. The existing high school has a relatively low student population of 210; the proposed modernization Project would increase the student population to 440 over time. The gradual increase in students would not have a significant impact on water availability. Furthermore, modern water faucets and toilets are more efficient, which could lead to reduced water consumption. Available water supplies would be sufficient for foreseeable future development during normal, dry, and multiple dry years.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be ***less than significant.***

Impact #3.4.19c – Would the Project result in a determination by the wastewater treatment provider that 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?

See Impact #3.4.19a.

The proposed Project includes the construction of buildings that will generate wastewater, such as bathrooms and the cafeteria, which would all connect to the existing wastewater infrastructure. Even though the Project would increase the student population over time, CDE regulation § 14030(e)(2) requires that Districts verify that site layouts are designed in a manner that allows utilities to accommodate anticipated growth. Under CBC and State water conservation requirements, the use of water-efficient fixtures would be implemented to ensure the minimal amount of water is utilized. The Project is anticipated to result in a minimal increase in wastewater generation compared to the existing wastewater generation and would not exceed the capacity of the wastewater treatment provider. Therefore, the Project would have a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be ***less than significant***.

Impact #3.4.19d – 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?

Implementation of the proposed Project would not increase the demand for solid waste disposal. During temporary construction, unused construction materials, which are not anticipated to contain hazardous materials, would be collected and transported away from the site. Solid waste that is collected during construction will be disposed of at the appropriate solid waste facility.

Once the buildout is complete, the campus will have a centralized trash collection area for municipal services to collect solid waste. The Project, in compliance with federal, State, and local statutes and regulations related to solid waste, would dispose of all waste generated on-site at an approved solid waste facility. The Project does not and would not conflict with federal, State, or local regulations related to solid waste. The proposed Project would be served by a landfill with a sufficient permitted capacity to accommodate the Project's solid waste disposal needs in compliance with federal, State, and local statutes and regulations related to solid waste. For example, CalRecycle mandates schools to recycle and redirect organics that generate 2 or more cubic yards per week of solid waste (CalRecycle, 2025). The District would comply with any applicable waste reduction requirements and utilize resources, whenever applicable to VCHS operation, in order to reduce their solid waste output. Therefore, the Project would have a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant.*

Impact #3.4.19e – Would the Project comply with federal, State, and local management and reduction statutes and regulations related to solid waste?

See discussion for Impact #3.4.19d.

The proposed Project would not be expected to significantly impact Kern County landfills. The proposed Project would be required to comply with all federal, State, and local statutes and regulations related to solid waste. Therefore, implementation of the proposed Project would result in a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant.*

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
3.4.20 - WILDFIRE				
If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the Project:				
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 concentration from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c. Require the installation or maintenance of associated infrastructure (such as roads, 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?	☐	☐	☒	☐

Discussion

Impact #3.4.20a – If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?

See also Impact #3.4.9f regarding emergency response.

The Project site is located within a Local Responsibility Area (LRA) and not located within a State Responsibility Area (SRA) or very high fire hazard area. As noted previously, Kern County EOP and the District's emergency plans establishes emergency procedures and policies and identifies responsible parties for emergency response in the County (County of Kern, 2022; Cal Fire, 2022) (Kern High School District, 2025) . These Plans include policies that would prevent new development from interfering with the emergency response of evacuation plans. The Project will adhere to the building codes and standards set forth in

CDE Title 5, the State Fire Marshall and DSA requirements. The Project would also comply with the appropriate local and State requirements regarding emergency response plans and access. The proposed Project would not inhibit the ability of local roadways to continue to accommodate emergency response and evacuation activities.

The proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, the Project would have a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant.*

Impact #3.4.20b – If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the Project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to, pollutant concentration from a wildfire or the uncontrolled spread of a wildfire?

The Project will be constructed and operated in existing developed areas. most recent Cal Fire's Fire Hazard Severity Zone mapping does not identify the Project site as an area with a high fire threat or within an SRA. The Wildland Urban Interface (WUI) is the zone of transition between unoccupied land and human development. It is the line, area, or zone where structures and other human development meet or intermingle with undeveloped wildland or vegetative fuels (U.S. Fire Administration , 2022). The Project site is not located within the Wildland Urban Interface (WUI) (ESRI, 2021). Furthermore, the Project areas are generally flat, and by implementing State and local fire code requirements, the Project would not exacerbate the risk of exposure of Project occupants to wildfire. Therefore, impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.20c – If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the Project require the installation or maintenance of associated infrastructure (such as roads, 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?

See Impacts # 3.4.9a, #3.4.9g, #3.4.20a, and #3.4.20b above.

The Project is not located near SRAs, lands classified as very high fire hazard severity zones, or within the WUI. The nearest very high fire hazard severity zone is located approximately 2.85 miles north of the Project site, in areas surrounding the Kern River. VCHS is an existing high school site, and as such, the subject property would have previously been analyzed and confirmed to meet the various criteria and thresholds regarding the proximity to hazardous utilities (i.e., high voltage transmission, high-pressure natural gas pipelines, etc.) by CDE.

This Impact section discussion is referenced in Education Code Section 17251 and the California Code of Regulations (CCR), Title 5, Sections 14001 through 14012. Specifically, a proposed school site should not be located within two miles of the centerline of an airport runway, pursuant to Education Code Section 17215. Specifically, a school site cannot be located within 350 feet of a high-voltage transmission line, within 1,500 feet of a high-pressure natural gas line, gasoline line, pressurized sewer lines, or high-pressure water pipelines.

The site is not within 350 feet of high-voltage transmission lines (California Energy Commission, 2024). The Project would not require the installation or maintenance of additional distribution lines. There are no identified pressurized sewer or high-pressure water pipelines in proximity to the school site (Soils Engineering, Inc., 2025).

Given the analysis above, the Project would not exacerbate fire risk or result in temporary or ongoing impacts to the environment, and impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be ***less than significant***.

Impact #3.4.20d – If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, 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?

See Impacts #3.4.9a, #3.4.9g, #3.4.20a, #3.4.20b, and #3.4.20c above.

The Project is not located near State responsibility areas or lands classified as very high fire hazard severity zones. The City and the Project sites are topographically flat land. There are no slopes on or near the property, and the Project would not expose the people or structures to significant risks from downslope or downstream flooding or landslides due to the result of runoff, post-fire instability, or drainage changes.

Therefore, the Project would have a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant.*

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
3.4.21 - MANDATORY FINDINGS OF SIGNIFICANCE					
a.	Does the Project have the potential to 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 significant 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 that would cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Discussion

Impact #3.4.21a – Does the Project have the potential to 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?

As evaluated in this IS/MND, the proposed Project would not 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; reduce the number or restrict the range of an endangered, rare, or

threatened species; or eliminate important examples of the major periods of California history or prehistory. With implementation of the mitigation measures recommended in this document, the proposed Project would not have the potential to degrade the quality of the environment, significantly impact biological resources, or eliminate important examples of the major periods of California's history or prehistory. Therefore, with the following mitigation measures, the Project would have a less-than-significant impact.

MITIGATION MEASURE(S)

Implementation of Mitigation Measures MM BIO-1 through MM BIO-9, MM CUL-1, MM HAZ-1, MM CUL-2, and MM GEO-1.

LEVEL OF SIGNIFICANCE

The Project would have a ***less-than-significant impact with mitigation incorporated***.

Impact #3.4.21b - Does the Project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a Project are significant when viewed in connection with the effects of past Projects, the effects of other current Projects, and the effects of probable future Projects.)

As described in the impact analyses in Sections 3.4.1 through 3.4.20 of this IS/MND, any potentially significant impacts of the proposed Project would be reduced to a less than significant level following the incorporation of the mitigation measures listed. The proposed Project would not otherwise combine with the impacts of related development to add considerably to any cumulative impacts in the region. With mitigation, the proposed Project would not have impacts that are individually limited but cumulatively considerable. Therefore, the Project would have a less-than-cumulatively-considerable impact with mitigation incorporated.

MITIGATION MEASURE(S)

Implementation of Mitigation Measures MM BIO-1 through MM BIO-9, MM CUL-1 and MM CUL-2, MM HAZ-1 and MM GEO-1.

LEVEL OF SIGNIFICANCE

The Project would have a ***less-than-significant impact with mitigation incorporated***.

Impact #3.4.21c - Does the Project have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?

All of the Project's impacts, both direct and indirect, that are attributable to the Project were identified and mitigated. The Project mitigation measures will substantially reduce or eliminate the impacts of the Project. Therefore, the proposed Project would not either directly or indirectly cause substantial adverse effects on human beings because all

potentially adverse direct impacts of the proposed Project are identified as having no impact, less than significant impact, or less than significant impact with mitigation.

MITIGATION MEASURE(S)

Implementation of Mitigation Measures MM BIO-1 through MM BIO-9, MM CUL-1 and MM CUL-2, MM HAZ-1 and MM GEO-1.

LEVEL OF SIGNIFICANCE

The Project would have a ***less-than-significant impact with mitigation incorporated***.

SECTION 4 - MITIGATION MONITORING AND REPORTING PROGRAM

RESERVED

SECTION 5 - LIST OF PREPARERS

5.1 - Lead Agency

- Randall Rowles
- Greg Wilkens

- John Cohrs

5.2 - Consultant - QK

- Jaymie Brauer – Project Manager

- Bella Hedtke – Associate Planner

- Robert Parr – Technical Author (Cultural)

- Karissa Denney – Technical Author (Biological)

- Matthew Daniels - Technical Author (Air Quality)

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APPENDIX A
SMALL PROJECT ANALYSIS LEVEL (SPAL)

APPENDIX B
BIOLOGICAL RESOURCE EVALUATION (BRE)

APPENDIX C
CULTURAL RESOURCES TECHNICAL MEMORANDUM

APPENDIX D
GEOTECHNICAL INVESTIGATION REPORT