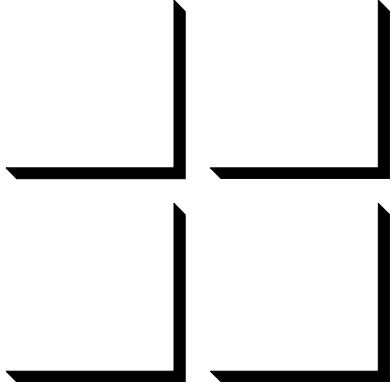


March 28, 2008

Draft Program Environmental Impact Report for the Lodi Community Improvement Project

Redevelopment Agency of the City of Lodi

SCH NO. 2008022053



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REDEVELOPMENT AGENCY OF THE CITY OF LODI

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DRAFT

PROGRAM ENVIRONMENTAL IMPACT REPORT

for the

Lodi Community Improvement Project

(SCH NO. 2008022053)

March 28, 2008

Prepared for:
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Draft Program Environmental Impact Report for the Lodi Community Improvement Project

TABLE OF CONTENTS

Preface.....	iii
1.0 Summary	1
1.1 Summary Project Description	1
1.2 Summary of Impacts and Mitigation Measures.....	1
1.3 Summary of Alternatives	3
1.4 Areas of Controversy	4
1.5 Issues to be Resolved.....	5
2.0 Introduction	7
2.1 Environmental Impact Report Required	7
2.2 Purpose, Intent, and Scope.....	7
2.3 Mitigation Monitoring Program.....	12
2.4 Project Proponent	12
2.5 Incorporation by Reference	12
3.0 Project Description	15
3.1 Project Background.....	15
3.2 Project Location	15
3.3 Plan Goals	18
3.4 Redevelopment Plan Components	19
3.5 Project Area Existing Conditions.....	20
4.0 Existing Conditions, Impacts, and Mitigation Measures	31
4.1 Land Use & Planning	32
4.2 Population & Housing	36
4.3 Traffic	38
4.4 Air Quality	42
4.5 Public Services	60
4.6 Utilities.....	66
4.7 Cultural Resources	72
5.0 Long-term Impacts Summary	75
5.1 Growth Inducing Impacts.....	75
5.2 Cumulative Impacts Summary	76
5.3 Significant Environmental Impacts that Cannot be Avoided.....	77

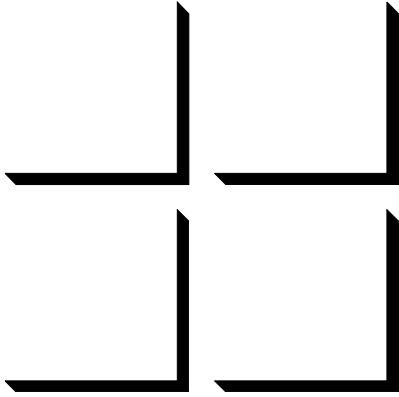
5.4	Mandatory Findings of Significance	78
5.5	Significant Irreversible Environmental Changes ...	78
6.0	Alternatives to the Proposed Project.....	81
6.1	No Project Alternative	83
6.2	Reduced Redevelopment Project Area Size	83
6.3	Environmentally Superior Alternative.....	84
7.0	Information Sources.....	85
7.1	Bibliography.....	85
7.2	Persons and Organizations Contacted	86
7.3	Preparation Staff	86
Appendix A - Initial Study and Notice of Preparation		
Appendix B - Correspondence		

LIST OF FIGURES

1.	Regional Location.....	16
2.	Project Area Boundary Map	17
3.	Existing Land Uses Map	26
4.	General Plan Land Uses Map	29

LIST OF TABLES

1.	Summary of Impacts and Mitigations Measures	2
2.	Existing Land Uses in the Project Area.....	25
3.	General Plan Land Uses in the Project Area	27
4.	Ambient Air Quality Standards	44
5.	Attainment Status for SJVAB	49
6.	Comparison of Project and Project Alternatives	82



PREFACE

This document is a program-level Environmental Impact Report (the “EIR”) prepared on behalf of the Redevelopment Agency of the City of Lodi (the “Agency”) in accordance with the statutes and guidelines of the California Environmental Quality Act (“CEQA”), Section 21000 et seq. of the Public Resources Code and Section 15000 et seq. of Title 14 of the California Code Regulations, CEQA Guidelines, and Agency and City of Lodi (“City”) requirements. The purpose of this EIR is to evaluate the potential environmental consequences of the activities necessary to implement the proposed Lodi Community Improvement Project (the “Project” or “Redevelopment Plan”).

The Project involves the adoption of the Agency’s Community Improvement Project. This proposed Redevelopment Plan would place approximately 2,407 acres of territory (the “Project Area”) into the Redevelopment Plan. The purpose of the Project is to provide a financial and administrative mechanism to alleviate blight and improve physical and economic conditions in the Project Area.

In accordance with Section 15146 of the CEQA Guidelines, the level of detail in this EIR corresponds to the level of detail in the Lodi Community Improvement Project¹. This document evaluates the direct, indirect and cumulative impacts of the Project at a level of detail comparable to that described in the policies and implementation measures of the proposed Project.

Section 21090 of the Public Resources Code specifies that an environmental impact report for a redevelopment plan may be a master environmental impact report, program environmental impact report, or a project environmental impact report. This EIR is a program EIR. The determination to prepare a program EIR was made

¹ Section 15146 and 15146 (b) of the CEQA Guidelines.

by the Agency consistent with Section 15168 of the CEQA Guidelines, which state that a program EIR may be prepared on a series of actions that can be characterized as one large project and are related either: (1) geographically, (2) a logical parts in the chain of contemplated actions, (3) in connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or (4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

Subsequent activities of the Redevelopment Plan will be examined in the light of this program EIR to determine whether an additional environmental document must be prepared. Because the timing and scope of future improvement projects to be undertaken with Agency funds in the Project Area are not known at this time, subsequent projects will likely require additional environmental analyses.

Future development assumptions used for all analyses in this EIR are based on the City of Lodi General Plan (the “General Plan”) that reflects the City’s presently adopted general plan goals and policies for the Project Area. Pursuant to State law², the Project must be consistent with General Plan land use policies. Upon its adoption, the Project will be a tool for implementing the provisions of the General Plan.

The EIR Process

In accordance with CEQA, the Agency and City serve as the joint lead public agency responsible for overseeing the EIR process and approving the Project. The Agency/City distributed a Notice of Preparation (“NOP”) advising others that an EIR would be prepared and listing the issues to be studied. The purpose of the NOP was to solicit comments on the scope and content of the EIR. A copy of the NOP, accompanying Initial Study and distribution list is found in Appendix A of this document. Those receiving copies of the NOP had 30 days to respond; the response period was from April 2, 2008 through March 19, 2008. Comments regarding the NOP were submitted to the Agency by the California Department of Transportation (“Caltrans”), San Joaquin County Multi-Species Habitat Conservation & Open Space Plan (“SJMSCP”), San Joaquin County Public Works Department, and San Joaquin Valley Air Pollution Control District (“SJVAPCD”).

This draft Program Environmental Impact Report (the “EIR”) was prepared following the 30-day NOP response period. The EIR is circulated for a 45-day public review period, as mandated by law. The

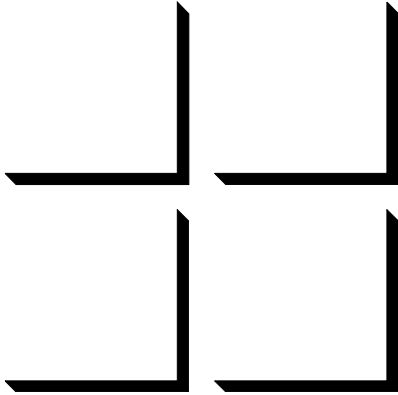
² State of California Community Redevelopment Law (Health and Safety Code 33000 et seq.).

review period begins on or about April 1, 2008 and ends on or about May 16, 2008. Written comments on the EIR are to be addressed to: Mr. Ernest Glover, GRC Redevelopment Consultants, Inc., 701 South Parker Street, Suite 7400, Orange, California 92868 and must be received no later than 5:00 p.m. on May 16, 2008. Responses to all written comments or questions on the EIR that are received during the review period will be prepared and included in the final Environmental Impact Report. The Agency will review and consider the final EIR before arriving at a decision to approve, revise or reject the proposed Project.

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1.0 SUMMARY

Following is a summary of the EIR for the Project. The EIR and all Project related materials are available for review at the Lodi City Hall, located at 221 W. Pine Street, Lodi, California 95241-1910.

Characteristics of the proposed Project, its identified significant environmental impacts, mitigation measures, and potential alternatives are summarized in this chapter. The remaining chapters of the EIR address details of issues outlined in this section.

1.1 SUMMARY PROJECT DESCRIPTION

The Project involves the adoption and implementation of the Lodi Community Improvement Project, encompassing approximately 2,407 acres³ (referred to herein as the “Project Area”). The Project Area is generally located east of Sacramento Street to the eastern border of the City, with some areas extending west to Ham Lane.

1.2 SUMMARY OF IMPACTS AND MITIGATION MEASURES

The following table summarizes the impacts and mitigation measures discussed in detail in Chapter 4.0. Potential environmental impacts of the Project are summarized in the left column of the table. The mitigation measures necessary for alleviating the impacts due to implementation of the Project are summarized in the second column of the table. The third column summarizes the status of the impacts after the implementation of the mitigation measures.

³ *Preliminary Report for the Lodi Community Improvement Project*, prepared for the Redevelopment Agency of the City of Lodi, prepared by GRC Redevelopment Consultants, Inc., March 6, 2008.

TABLE 1		
Lodi Community Improvement Project EIR		
SUMMARY OF IMPACTS AND MITIGATION MEASURES		
<i>POTENTIAL IMPACTS</i>	<i>MITIGATION MEASURES</i>	<i>STATUS AFTER MITIGATION</i>
LAND USE (See Section 4.1)		
None.	None required.	None.
POPULATION AND HOUSING (See Section 4.2)		
None.	None required.	None.
TRAFFIC (See Section 4.3)		
Future increases in traffic volumes will result primarily from cumulative development throughout the Project Area, which are a function of the General Plan's land use and circulation policies, rather than the Project.	None required.	Less Than Significant
AIR QUALITY (See Section 4.4)		
Project air quality impacts associated applicable air quality plans, construction activities, operational activities, global warming, exposure of sensitive receptors and odors could occur.	AQ-1: Future development proposals in the Project Area shall be subject to compliance with the established SJVAPCD Rules and Regulations Manual, which may include air quality impact studies and subsequent CEQA analysis. The City Community Development Director shall ensure compliance. AQ-2: Future development proposals in the Project Area shall be subject to compliance with a City adopted "green design" or "sustainable development" ordinance should such ordinance be adopted prior to project development. If such ordinance is not adopted prior to project development, each development shall be encouraged to incorporate any or all of current available energy-conservation features and "green" technologies into the project design .	Less Than Significant
PUBLIC SERVICES (See Section 4.5)		
None.	None required.	None.
UTILITIES (See Section 4.6)		
None.	None required.	None.

TABLE 1		
Lodi Community Improvement Project EIR		
SUMMARY OF IMPACTS AND MITIGATION MEASURES		
<i>POTENTIAL IMPACTS</i>	<i>MITIGATION MEASURES</i>	<i>STATUS AFTER MITIGATION</i>
CULTURAL RESOURCES (See Section 4.7)		
Potential exists for future development to impact historical resources.	CUL-1: Prior to issuance of any permits related to the exterior demolition, structural repair or construction on structures over 45 years of age and which are considered based on available City records to be potentially historically significant, a historical resource survey shall be conducted by a qualified consultant. Should the structure be found to be potentially significant, mitigation measures recommended by the historical resources consultant shall be considered for inclusion in the project. The City Community Development Director shall ensure compliance.	Less Than Significant.

**1.3
SUMMARY OF
ALTERNATIVES**

These alternatives were selected to illustrate the range of alternative actions the Agency can take regarding the Project, and the environmental costs and benefits associated with each alternative. Two potential alternatives to the proposed Redevelopment Plan are analyzed. Because the Project Area is already urbanized as defined by the Community Redevelopment Law (*CRL*), the alternatives generally reflect modest modifications to the proposed Redevelopment Project. The following is a summary of the alternatives that are fully described in Section 6.0:

No Project Alternative

This alternative assumes that the Project is terminated. Under this alternative, the Agency would not proceed with the proposal to adopt the Redevelopment Plan. If the proposal was terminated, the Agency's authority and powers would not be permitted in the Project Area. Existing conditions of blight would be allowed to continue.

**Reduced Project Area
Alternative**

Under this alternative, the size of the Project Area would be reduced. This reduction could involve the removal of the area east or west of Highway 99. If the Project Area was reduced in size, the Agency's authority and powers would not be permitted in the area to be removed. Existing conditions of blight in the area to be removed would be allowed to continue.

**Environmentally
Superior Alternative**

The Project has been proposed by the City and Agency for the primary purpose of eliminating blight in both the Project Area. Under either alternative, the Agency's ability to reduce blight in the Project Area would be restricted. Consequently, the Project is considered the superior alternative.

**1.4
AREAS OF
CONTROVERSY**

Section 15123(b)(2) of CEQA requires that the EIR Summary include a brief statement of areas of controversy associated with the Project and/or EIR process. Prior to preparation of the EIR, comments were received by the lead agency in response to the Project Initial Study and Notice of Preparation (NOP). These comments were submitted by Caltrans, San Joaquin Council of Governments (SJCOG), San Joaquin County Public Works Department, and San Joaquin Air Pollution Control District.

San Joaquin Council of Governments (SJCOG): Correspondence received from SJCOG⁴, requested a revision to a statement made in the Project Initial Study under section IV. *Biological Resources*. This section of the Initial Study states that the Project Area is classified by the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP) as urban plans. The SJMSCP provides a strategy for balancing the conversion of open space to non-open space uses with the need for the long-term management of plant, fish and wildlife species, especially those that are currently listed, or may be listed in the future, under the Federal Endangered Species Act (FESA) or the California Endangered Species Act (CESA). The SJMSCP resulted from the San Joaquin Council of Governments' efforts to develop a regional approach to managing the biological resources of the County.

SJCOG points out in their correspondence that the properties within the eastern portion of the Project Area include land designated by the SJMSCP as multi-purpose or agricultural land. As also noted in the correspondence, the City of Lodi is a signatory to the SJMSCP. Participation in the SJMSCP satisfies requirements of the state and federally endangered species acts, and ensures that potential impacts are mitigated below a level of significance in compliance with CEQA.

SJCOG clarification is noted. However, as discussed in the Project Initial Study, future development activity within the Project Area would be required to comply with applicable provisions of the SJMSCP. Compliance with the SJMCP is expected to reduce potentially adverse impacts to biological resource habitats, sensitive species, wildlife movements, and biological resource protection policies

⁴ Correspondence from San Joaquin County Multi-Species Habitat Conservation & Open Space Plan (SJMSCP), Ann-Marie Poggio-Castillou, dated February 29, 2008, contained in Appendix B.

and conservation plans to less than significant levels. This finding is consistent with the comments made in SJCOG's correspondence, and no further discussion of biological resources within this EIR is warranted.

**1.5
ISSUES TO BE
RESOLVED**

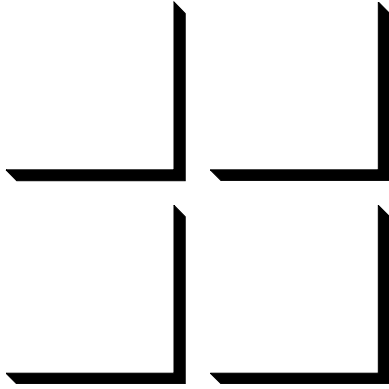
Section 15123(b)(3) of the CEQA Guidelines requires that the EIR Summary include a brief statement of issues to be resolved. In this proposed Project, the major issues to be resolved include decisions by the City as to:

1. Whether this EIR adequately describes the environmental impacts of the Project;
2. Whether the mitigation measures identified in this EIR should be adopted or modified; and
3. Whether there are any alternatives to the Project that would substantially lessen the significant impacts of the proposed Project and achieve most of the basic objectives.

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2.0 INTRODUCTION

This EIR examines the existing conditions and potential environmental impacts to the Lodi community and surrounding areas from implementation of the Lodi Community Improvement Project.

2.1 ENVIRONMENTAL IMPACT REPORT REQUIRED

The proposed Project involves the adoption and implementation of a Redevelopment Plan. Adoption and implementation of a redevelopment plan comprises a project as defined by CEQA, and is thus subject to the provisions of CEQA and State CEQA Guidelines.

2.2 PURPOSE, INTENT, AND SCOPE

This EIR has been prepared to comply with the provisions of CEQA, the CEQA Guidelines and the Redevelopment Agency of the City of Lodi and City of Lodi (City) guidelines for implementing CEQA. The purpose of this document is to identify, evaluate, and propose mitigation measures and alternatives to reduce Project impacts, if required, for significant environmental impacts that may be associated with the adoption of the Project.

This document also seeks to solicit comments from public agencies, other organizations and the public at large. The EIR is intended for use as an informational document, and neither makes any recommendations regarding the Project, nor authorizes any implementing actions by the Agency or the City. Rather, the EIR is oriented toward providing decision makers, their staffs, other involved public agencies, interested organizations, and the general public with an objective and impartial assessment of the potential environmental impacts that could result from implementation of the Project.

This document also is intended to provide a forum for the discussion of the Project's potential impacts through the public review, comment and public hearing process. Pursuant to CEQA Guidelines Section 15180, which requires EIRs in support of redevelopment plans to be program EIRs, this EIR is a program EIR. Section 15168 of the CEQA

Guidelines defines a program EIR as that which evaluates the overall effect of a series of actions that are related through the “issuance of rules, regulations, plans, or general criteria to govern the conduct of a continuing program...” Program EIRs are most useful in addressing program-wide impacts, including the secondary or cumulative effects of what would otherwise be a series of individual actions that would be environmentally evaluated separately.

In accordance with the purpose and intent of this EIR and input provided by the applicant, community, public agencies, and technical staff and consultants, the scope of issues to be discussed in this EIR was determined through the following mechanisms:

**2.2.1
Initial Study**

An Initial Study, pursuant to Section 15063 of the CEQA Guidelines, was prepared to identify potential impacts of the Project. The Initial Study determined that a number of environmental factors would be potentially affected by the Project, and that a Program EIR was required to address these identified effects. Potentially impacted environmental factors identified through the Initial Study include: agricultural resources, land use/planning, population and housing, traffic, air quality, cultural resources, public services, utilities.

**2.2.2
Notice of Preparation**

A formal Notice of Preparation (NOP) and a copy of the Initial Study were subsequently circulated to public agencies with potential interest in the Project and neighboring property owners. Appendix A contains a copy of this notice and the Initial Study. Copies of all correspondence received in response to the NOP are contained in Appendix B.

As discussed in Section 1.4, comments to the NOP were submitted by Caltrans, SJCOG, San Joaquin County Public Works Department, and SJVAPCD. These comments raised issues regarding the SJMSCP; improvements within the San Joaquin County road rights-of-way; air quality setting and air quality analysis requirements within the San Joaquin Valley Air Pollution Control District; and requirements for future traffic impact statements.

CEQA does not require a response to NOP comments, but rather the project sponsor is to consider comments and, if necessary, expand the scope of the EIR. The comment from SJCOG clarified information contained in the Biological Resource section of the Project Initial Study. Because biological resources are not included as a topic of this EIR, a response to SJCOG’s comment is provided in Section 1.4. Comments from SJVAPCD, Caltrans and County Public Works are addressed in Section 4.0 of the EIR.

**2.2.3
Scope of EIR**

Based on these issues identified through the Initial Study, and NOP processes, this EIR encompasses the following environmental topics that correspond to the criteria outlined in the Initial Study:

Land Use and Planning:

- Would the Project be incompatible with existing land use in the vicinity? (Reference Item IX. a of the Initial Study.)
- Would the Project result in potential conflicts with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project? (Reference Item IX. b of the Initial Study.)
- 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? (Reference Item Agricultural Resources I. c. of the Initial Study.)

Population and Housing:

- Would the Project induce substantial 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)? (Reference Item XII. a. of the Initial Study.)

Traffic:

- Would the Project result in an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system? (Reference Item XV. a of the Initial Study.)
- Would the Project exceed, either individually or cumulatively, a level of service standard established by the City or former congestion management agency? (Reference Item XV. b of the Initial Study.)

Air Quality:

- Would the Project violate any air quality standard or substantial contribution to an existing or projected air quality violation? (Reference Item III. b of the Initial Study.)
- 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? (Reference Item III. c of the Initial Study.)
- Would the Project expose sensitive receptors to substantial pollutant concentrations? (Reference Item III. d of the Initial Study.)

- Would the Project create objectionable odors affecting a substantial number of people? (Reference Item III. e of the Initial Study.)

Public Services:

- Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services? (Reference Item XIII. a of the Initial Study.)
 - (a) Fire protection;
 - (b) Police protection;
 - (c) Schools, including the County Office of Education;
 - (d) Parks.

Utilities:

- Would the Project:
 - (a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? (Reference Item XVI. a of the Initial Study.)
 - (b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? (Reference Item XVI. b of the Initial Study.)
 - (c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? (Reference Item XVI. c of the Initial Study.)
 - (d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? (Reference Item XVI. d of the Initial Study.)
 - (e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? (Reference Item XVI. e of the Initial Study.)

(f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? (Reference Item XVI. f of the Initial Study.)

(g) Comply with federal, state, and local statutes and regulations related to solid waste? (Reference Item XVI. g of the Initial Study.)

Cultural Resources:

- Would the Project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5? (Reference Item V. a of the Initial Study.)

**2.2.4
Effects Found
Not to be
Significant**

The following is a list of issues determined by the preliminary environmental assessment (Initial Study) and confirmed through the NOP and EIR scoping process to be “not significant” or “less than significant” (see Appendix A). A “not significant” impact is defined by CEQA as an adverse effect that is not substantial, an effect that is insignificant or an effect that is unlikely to occur. A “less than significant” impact would not exceed identifiable thresholds of significance and would not require mitigation. The “not significant” and “less than significant” issues are consequently not relevant to environmental impacts for the Project, and are not evaluated in this EIR. The following lists the “not significant” and “less than significant” issues excluded from this EIR:

- Aesthetics (issues related to Items I.a-d, as identified in the Initial Study).
- Agricultural Resources (issues related to Items II.a, d, as identified in the Initial Study).
- Biological Resources (issues related to Items IV.a-f, as identified in the Initial Study).
- Cultural Resources (issues related to Items V.b-d, as identified in the Initial Study).
- Geology and Soils (issues related to Items VI.a-e, as identified in the Initial Study).
- Hazards and Hazardous Materials (issues related to Items VII.a-d, as identified in the Initial Study).
- Hydrology and Water Quality (issues related to Items VIII.a-j, as identified in the Initial Study).
- Land Use and Planning (issues related to Item IX.c, as identified in the Initial Study).
- Mineral Resources (issues related to Items X.a-b, as identified in the Initial Study).

- Noise (issues related to Items XI.a-f, as identified in the Initial Study).
- Population and Housing (issues related to Items XII.b-c, as identified in the Initial Study).
- Recreation (issues related to Items XIV.a-b, as identified in the Initial Study).
- Transportation/Traffic (issues related to Items XV.c-g, as identified in the Initial Study).

2.3 MITIGATION MONITORING PROGRAM

Pursuant to the Public Resources Code Section 21081.6, public agencies are required to establish monitoring programs to ensure that Project mitigation measures are adopted and implemented. A mitigation monitoring program, incorporating the mitigation measures set forth in this document, will be included with the Final EIR and adopted at the time of certification of the EIR.

2.4 PROJECT PROPONENT

The Project is proposed by the Agency, which has an office located at 221 W. Pine Street, Lodi, CA 95241-1910.

With respect to CEQA, the Agency and the City serve as joint lead agency for the proposed Project. This determination of lead agency is made by mutual consent of the Agency and City pursuant to Section 15051(d) of the CEQA Guidelines.

Once the Project is adopted, there will be no other permits necessary from other public agencies, including responsible agencies, in order for the Redevelopment Plan to become effective.

2.5 INCORPORATION BY REFERENCE

Section 15150 of the CEQA Guidelines encourages incorporation by reference of other documents to eliminate the need for inclusion of copious technical and other background information into an EIR. Of particular relevance to this EIR are the following documents, all of which are hereby incorporated by reference into this EIR, and are available for inspection at the Agency. Brief descriptions of each document follow. (Other documents utilized as references for this document are listed in Section 7.0):

City of Lodi General Plan & Environmental Impact Report, October 5, 1992 – Redevelopment projects, including Redevelopment Plans, must be consistent with the General Plan, according to Section 33331 of the CRL. As such, this EIR evaluates the Redevelopment Plan’s relationship to the General Plan goals and polices that are

applicable to the proposed Project. The General Plan contains all the statutorily required general plan elements as they pertain to the Project Area. (This document is available at the City of Lodi Community Development Department.)

The EIR for the City of Lodi General Plan evaluates environmental impacts associated with development in accordance with the General Plan policies. (This document is compiled as part of the General Plan and is available at the City of Lodi Community Development Department.)

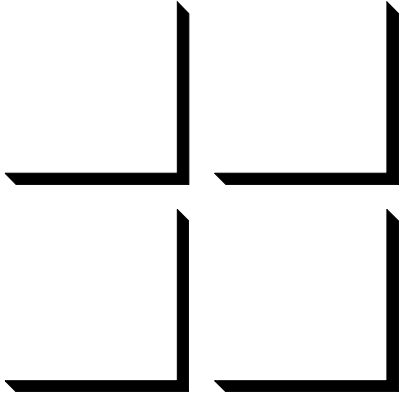
Preliminary Report for Lodi Community Improvement Project, March 6, 2008 – This report was prepared by GRC Redevelopment Consultants, Inc. on behalf of the Agency in accordance with CRL Section 33344.5. The Preliminary Report was prepared and distributed to the governmental agencies that levy ad valorem property taxes in the Project Area. The requirements for this Preliminary Report contains the following:

- (a) The reasons for the adoption of the Redevelopment Plan and selection of the Project Area
- (b) A description of the proposed Project Area, which is sufficiently detailed for a determination as to whether the proposed Project Area is predominantly urbanized.
- (c) A description of the existing physical and economic conditions in the proposed Project Area.
- (d) A description of the specific project or projects then proposed by the Agency.
- (e) A preliminary assessment of the proposed method of financing the redevelopment of the proposed Project Area, including an assessment of the economic feasibility of the project and the reasons for including the provision for the division of taxes pursuant to CRL Section 33670 in the Redevelopment Plan for the proposed Project.
- (f) A description of how the project or projects to be pursued by the Agency in the proposed Project Area will improve or alleviate the conditions described above.

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3.0 PROJECT DESCRIPTION

This Chapter discusses the Project’s background, location, goals; components of the Redevelopment Plan, and Project Area’s existing conditions including blight, urbanization, existing land uses and planned General Plan Land Use Map designations.

3.1 PROJECT BACKGROUND

Lodi is one of the few cities in California that does not have a redevelopment project area. Yet, even from a cursory view of the area, there are portions of the eastern half of the City that exhibit blighting conditions and are in need of substantial improvements.

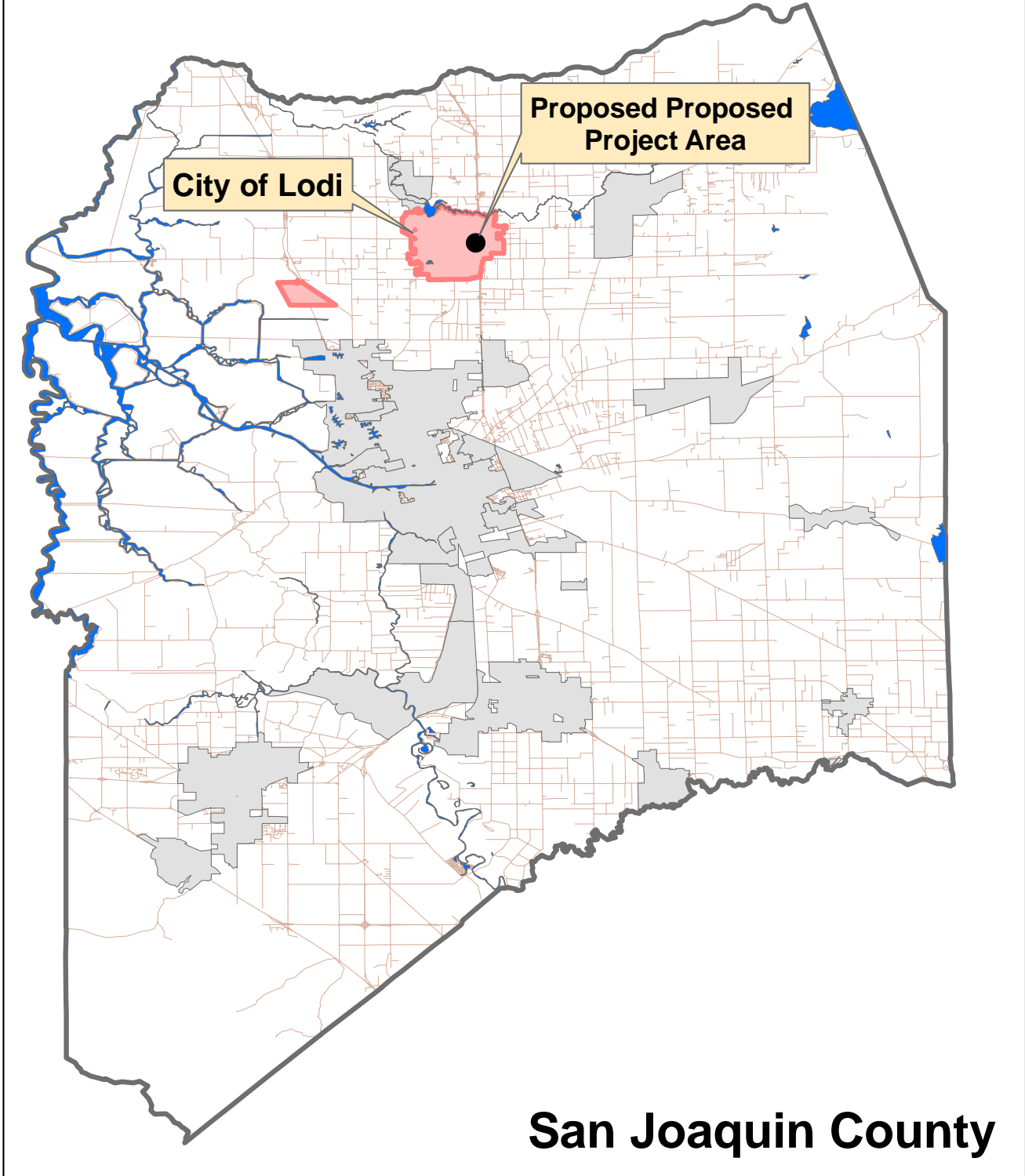
Creating a redevelopment project under CRL (Health and Safety Code Section 33000 et seq.; the “CRL”) may be the best way to address these problems, because it can provide a significant amount of money to address the problems affecting the area without raising taxes or imposing new fees. With this in mind, the Agency has begun the process to complete the adoption of a redevelopment project area in east Lodi.

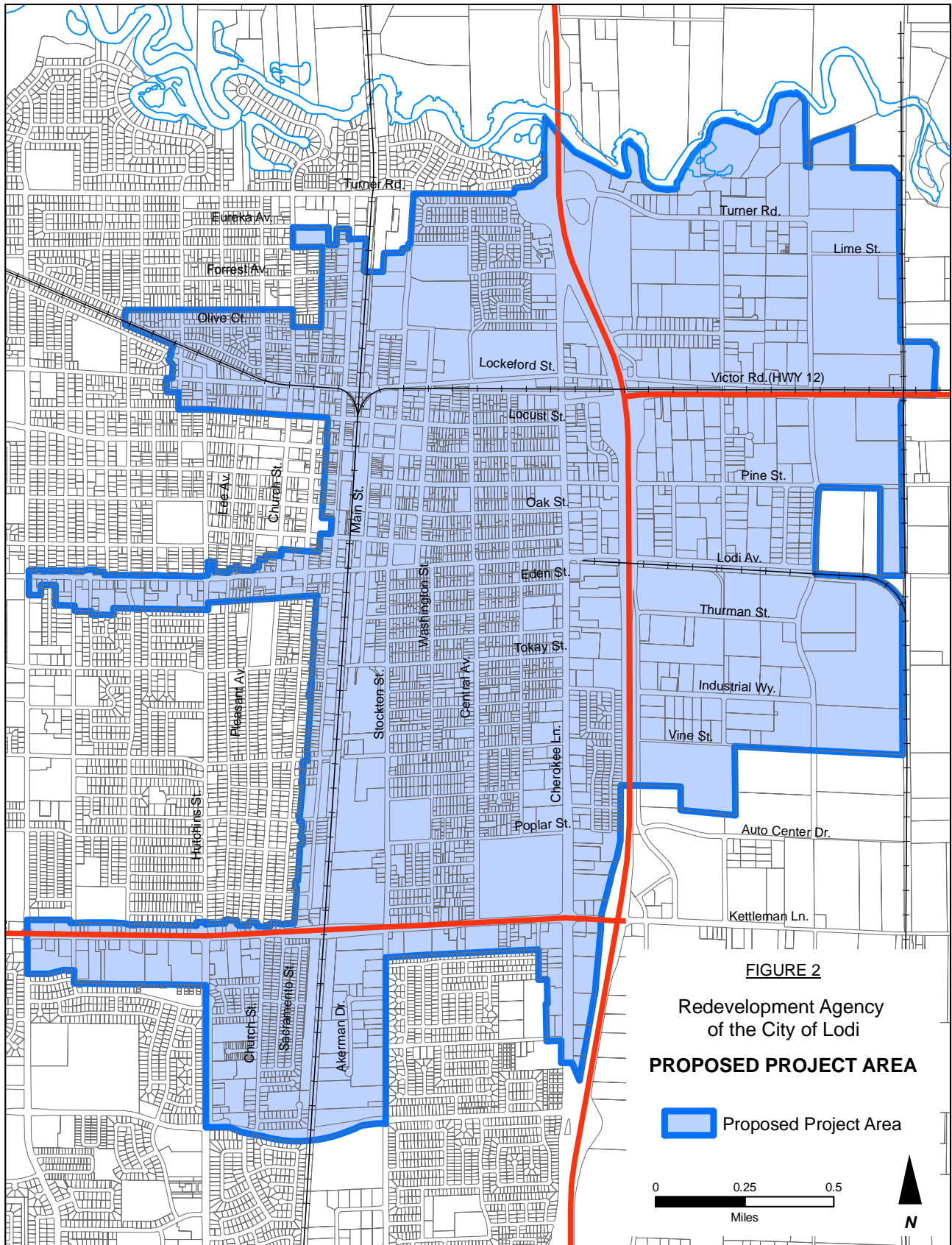
3.2 PROJECT LOCATION

Regionally, the City of Lodi is located in San Joaquin County, and approximately 34 miles south of Sacramento, 13 miles north of Stockton, and 90 miles east of San Francisco. State Route 99 (“SR 99”) runs north-south through the eastern portion of the City, and Interstate 5 (I-5) runs north-south approximately 7 miles to the west. (See Project Regional Location Map, Figure 1.)

The Project Area is generally located in the eastern portion of the City. It is bordered on the north and east by the City boundaries. On the south, its boundary is irregular, bordered by Elgin Avenue and Century Boulevard. On the west, its boundary also is irregular, generally located just west of Sacramento Street, with portions extending as far west as Sunset Drive. (See Project Area Boundary Map, Figure 2.)

Figure 1
Regional Location Map





3.3 PROJECT GOALS

As recognized by Section 33030 of the CRL, blighted areas “exist in many communities” and can “constitute physical and economic liabilities” that require governmental assistance “in the interest of the health, safety, and general welfare of the people of these communities.”

The purpose of the proposed Redevelopment Project is to provide a financial and administrative mechanism to alleviate blight and improve physical and economic conditions in the Proposed Project Area.

General goals of the Agency in adopting the Redevelopment Plan are listed below. These goals may be refined, expanded upon, or otherwise modified throughout the adoption process.

- Improve infrastructure
- Stimulate new commercial, industrial and residential construction
- Rehabilitate and modernize existing commercial, industrial, and residential properties
- Aid the preservation of historic structures and neighborhoods
- Enhance the appeal of the east side neighborhoods as a place to live
- Alleviate problems associated with uses that do not conform to the General Plan or are incompatible with adjacent uses
- Improve the overall aesthetics of the area, including property maintenance, streetscape improvements, landscaping, signage, and billboard removal
- Reduce crime and graffiti
- Create local job opportunities by preserving and expanding the area's existing employment base
- Establish modern, convenient commercial outlets to serve the needs of nearby neighborhoods and travelers
- Eliminate or alleviate environmental hazards
- Expand and upgrade the community's supply of affordable housing
- Develop housing programs to assist with home ownership
- Assist with the assembly of parcels into more-developable sites
- Improve and/or construct community facilities, parks and public uses
- Construct/replace missing sidewalks and aging water and wastewater facilities

- Install water meters
- Construct police and fire facilities
- Upgrade library facilities
- Improve ADA access
- Improve circulation and pedestrian mobility
- Assist with the promotion of tourism
- Promote infill development and smart growth principles.

3.4 REDEVELOPMENT PLAN COMPONENTS

A redevelopment project is a comprehensive program for the elimination of blight within the specific project boundaries set forth in the redevelopment plan. The Lodi Community Improvement Project includes a number of components that establish the Agency's policy for the future development of the Project Area and actions the Agency may take in implementing that policy. The principal components of the Redevelopment Project are:

1. **Implementation Program:** An implementation program describes proposed redevelopment activities, indicating how the Agency intends to carry out the plan and the legal powers that the Agency may exercise in the Project Area. These legal powers include the power to acquire property, to manage and operate property until it is resold, to relocate and provide replacement housing for displaced occupants; to demolish or remove buildings and improvements, to rehabilitate and preserve buildings and structures, and to install, construct, expand, add, maintain and reconstruct streets, utilities and other public improvements and facilities.
2. **Land Use Plan:** A land use plan indicates the proposed uses for each parcel within the Project Area boundaries and establishes criteria for development. Proposed land uses, as well as population densities and building standards are consistent with the General Plan, and all other applicable codes and ordinances, as amended from time to time.
3. **Capital Improvements List:** A capital improvements list outlines the proposed public improvements that may be funded by the Agency in support of revitalization of the Project Area.
4. **Financing Plan:** A financing plan outlines how the Agency will fund the project, including collection of tax increment revenues, issuing of tax increment bonds, and establishing time limits for the indebtedness.

3.5 PROJECT AREA EXISTING CONDITIONS

This section discusses existing conditions within the Project Area, including conditions of blight and urbanization, and existing and planned land uses in the Project Area.

3.5.1 Blighting Conditions

The Preliminary Report for the Redevelopment Plan⁵ contains a detailed description of existing blight-related conditions in the Project Area. Pursuant to the CRL, to adopt a redevelopment area, the Agency must demonstrate that the area meets several conditions relative to blight and urbanization. These conditions, as well as the Project Area's ability to meet these conditions, are summarized below.

Definitions of Blight

In general, blight is a physical, social or economic condition that reduces or eliminates the proper utilization of an area to such an extent that the blighting conditions cannot be reversed or alleviated by private enterprise acting alone. The following definitions have been updated pursuant to certain amendments to the CRL that became effective in 2007

CRL Section 33030(b) states that a blighted area must be characterized by both physical and economic conditions of blight. According to CRL Section 33031(a), physical blight includes the following conditions:

1. Buildings in which it is unsafe or unhealthy for persons to live or work. These conditions may be caused by serious building code violations, serious dilapidation and deterioration caused by long-term neglect, construction that is vulnerable to serious damage from seismic or geologic hazards, presence of hazardous materials, and faulty or inadequate water or sewer utilities.
2. Conditions that prevent or substantially hinder the viable use or capacity of buildings or lots. These conditions may be caused by buildings of substandard, defective, or obsolete design or construction given the present general plan, zoning, or other development standards.
3. Adjacent or nearby incompatible land uses that prevent the development of those parcels or other portions of the Project Area.
4. The existence of subdivided lots that are in multiple ownership and whose physical development has been impaired by their irregular shapes and inadequate sizes, given present general plan and zoning standards and present market conditions.

⁵ *Preliminary Report for the Lodi Community Improvement Project*, GRC Redevelopment Consultants, Inc. (March 6, 2008); available at Agency office.

CRL Section 33031(b) defines economic blight to include the following conditions:

1. Depreciated or stagnant property values.
2. Impaired property values, due in significant part, to hazardous wastes on property where the agency may be eligible to use its authority as specified in Article 12.5 (commencing with Section 33459).
3. Abnormally high business vacancies, abnormally low lease rates, or an abnormally high number of abandoned buildings.
4. A serious lack of necessary commercial facilities that are normally found in neighborhoods, including grocery stores, drug stores, and banks and other lending institutions.
5. Serious residential overcrowding that has resulted in significant public health or safety problems. As used in this paragraph, "overcrowding" means exceeding the standard referenced in Article 5 (commencing with Section 32) of Chapter 1 of Title 25 of the California Code of Regulations.
6. An excess of bars, liquor stores, or adult-oriented businesses that has resulted in significant in public health, safety, or welfare problems.
7. A high crime rate that constitutes a serious threat to the public safety and welfare.

Non-blighted land may be included in the Project Area if it is found necessary for effective redevelopment. With some exceptions, land necessary for effective redevelopment must be a contiguous part of an otherwise blighted area. A non-blighted noncontiguous area is conclusively deemed necessary for effective redevelopment if such an area is being used predominantly for:

1. Relocation of owners or tenants from other noncontiguous areas in the same project area or from other project areas in the community.
2. Low- and moderate-income housing.

“Five Part Test”

While blighting conditions may be found in an area, land being considered for inclusion in a project area must pass five basic tests.

1. Land must be urbanized. (CRL requires that 80% of the land in a project area be urbanized.)
2. Land must have prevalent physical and economic blight, or must be necessary for effective redevelopment (as defined above).

3. Blight must cause a lack of proper utilization of the area.
4. Improper utilization must be a serious burden on community.
5. Burden cannot be reversed by private enterprise acting alone, by the City acting alone, or by both acting together without the assistance of a redevelopment agency.

Blighting Conditions in the Project Area

In accordance with CRL Section 33031(a), field studies completed by GRC Redevelopment Consultants, Inc. in support of the Lodi Community Improvement Project⁶ identified the physical and economic conditions of blight in the Redevelopment Project Area. Conditions of blight in the Project Area include:

- Buildings that are unsafe or unhealthy in which to live or work
- Conditions that prevent or substantially hinder the viable use of buildings or lots
- Incompatible uses that prevent economic development
- Parcels of irregular size or shape
- Depreciated or stagnant values
- Vacancies, low lease rates, and abandoned buildings
- High crime rate.

Overall, 3,405 of the 4,108 properties in the Project Area (83%) show at least one characteristic of physical blight. The remaining properties are necessary for effective redevelopment, as discussed in the next Chapter.

In addition, all properties (100%) share in the burden of economic blight because of the costs involved in the cleanup of hazardous materials and the impacts of stagnant property values. Hazardous materials occur in the groundwater of some areas of the Project Area that was contaminated with the chemicals tetrachloroethylene and trichloroethylene, which are used as industrial solvents and in dry cleaning and known to cause cancer. Other hazardous materials are asbestos, previously used for fireproofing, linked to several varieties of cancer and subsequently banned in the late 1970's, and lead-based paint, linked to neurological disorders and subsequently banned in the late 1970's.

⁶ *Feasibility Study for a Potential Redevelopment Project in East Lodi*, prepared by GRC Redevelopment Consultants, Inc, October 19, 2007

The identified physical and economic blighting conditions are summarized below:

- There are five known contaminated groundwater plumes that underlie all or virtually all of the proposed Project Area.
- Cleanup of the contaminated plumes is expected to cost \$46.5 million.
- About 1,830 properties are likely to contain asbestos or lead-based paint.
- About 22% of all buildings are in some degree of significant disrepair.
- Properties with dilapidated structures are assessed 65% lower than those in good condition.
- About 45% of commercial properties show signs of serious obsolescence.
- Commercial properties with obsolescence are assessed 15% lower than those without obsolescence.
- Average age of structures is 60 years, with 858 structures over 75 years old and 87 over 100 years old.
- Almost 990 residential properties are owned by absentee owners.
- Single-family properties owned by absentee owners are assessed 31% lower than those that are owner-occupied.
- Approximately \$128 million of infrastructure improvements are needed.
- Nearly 300 graffiti, exposed trash containers, barbed- and razor-wire, and other similar conditions that limit economic viability.
- Nearly 750 properties are affected by incompatible or non-conforming uses.
- Residential properties with incompatible or non-conforming uses are assessed 32% lower than those that are compatible or conforming.
- At only 0.70 acre, the average commercial parcel is extremely small for any modern development.

- Over 610 parcels are of irregular shape or size.
- There are 94 vacant businesses.

3.5.2 Documentation of Urbanization

CRL requires that a redevelopment project area be predominantly urbanized. Section 33320.1 of the CRL defines "predominantly urbanized" to mean that not less than 80 percent of the land in the Project Area is urbanized, including land that:

- a) Has been or is developed for urban uses; or
- b) Is an integral part of one or more areas developed for urban uses that are surrounded or substantially surrounded by parcels that have been or are developed for urban uses. Parcels separated by only an improved right-of-way shall be deemed adjacent for the purpose of this subdivision.

In the Project Area, the Preliminary Report indicates that 87% of the total land area qualifies as urbanized land. This percentage includes streets, urban land uses, and parcels that are an integral part of an area developed for urban uses. These conditions in the Project Area meet the CRL definition of "urbanized."

3.5.3 Existing Land Uses in the Project Area

Existing land uses in the Project Area are presented in Table 2 and Figure 3, *Existing Land Uses in Project Area Map*.

As shown in Table 2, existing character of the Project Area is mixed, with industrial comprising 27% of the total area, residential 23%⁷, commercial 14%, and public/institutional 12%⁸.

As shown in Figure 3, most of the existing industrial land is located on the east side of the Project Area, and along Main Street and the railroad tracks. Most of the existing residential land is located in the central and western portions of the Project Area. Existing commercial is mostly along the Highway 99 and the major arterial roadways, including Lodi Avenue, Cherokee Lane and West Kettleman Lane. Public/institutional uses are scattered throughout the Project Area.

⁷ Residential consists of multi-family (7%), single-family (14%) and mobile home park (2%).

⁸ Public/institutional consists of church (2%), public (10%), school (< 1%).

TABLE 2			
Lodi Community Improvement Project EIR			
EXISTING LAND USES BY USE # OF PARCELS, # ACRES AND % OF TOTAL ACREAGE			
USE	# OF PARCELS	# OF ACRES	% OF GRAND TOTAL ACREAGE
Church	22	41.30	2
Commercial	483	335.72	14
Industrial	373	642.31	27
Multi-Family Residential	688	158.26	7
Single-Family Residential	2,277	343.63	14
Mobile Home Park	6	45.80	2
Mixed Use	48	12.60	1
Public	101	230.22	10
School	1	3.60	< 1
Vacant	102	166.52	6
Unknown	7	3.65	< 1
Sub Total	4,108	1,983.61	83
Streets	n/a	423.53	17
Grand Total		2,407.14	100

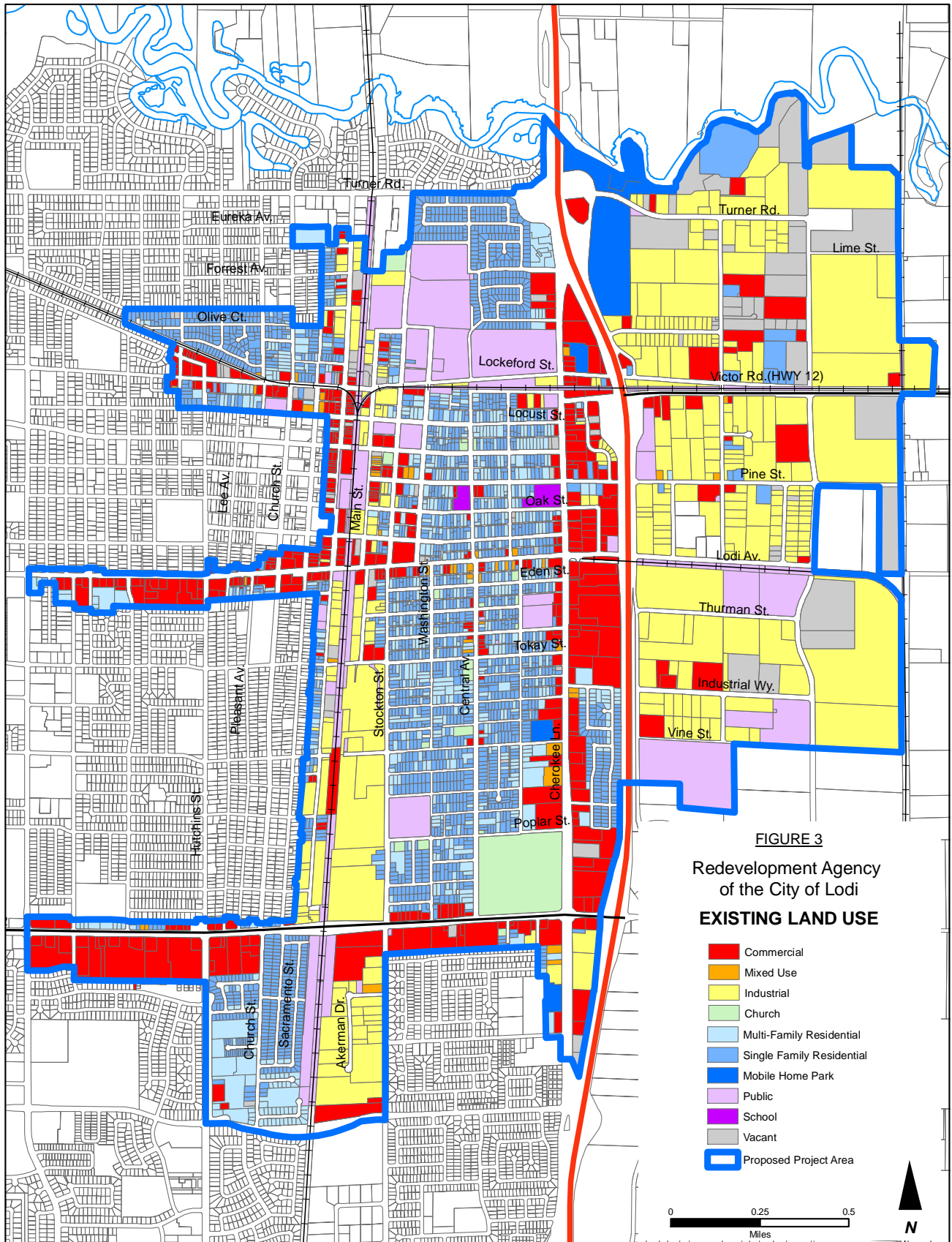


FIGURE 3
 Redevelopment Agency of the City of Lodi
EXISTING LAND USE

- Commercial
- Mixed Use
- Industrial
- Church
- Multi-Family Residential
- Single Family Residential
- Mobile Home Park
- Public
- School
- Vacant
- Proposed Project Area

0 0.25 0.5
 Miles



**3.5.4
Planned Land Uses in
the Project Area**

Planned land uses in the Project Area are promulgated by the City General Plan Land Use Map. Table 3, below, lists these County land use designations by acreage, and Figure 4, *City General Plan Designated Land Uses in Project Area Map*, depicts the areas graphically.

TABLE 3			
Lodi Community Improvement Project EIR			
GENERAL PLAN LAND USE ELEMENT			
PLANNED LAND USES BY USE # OF PARCELS, # ACRES			
AND % OF TOTAL ACREAGE			
USE	# OF PARCELS	# OF ACRES	% OF GRAND TOTAL ACREAGE
Downtown Commercial	113	29.71	1
General Commercial	296	175.19	7
Neighborhood Community Commercial	158	80.02	3
Office	21	8.31	< 1
High Density Residential	14	9.56	< 1
Medium Density Residential	138	87.47	4
Low Density Residential	721	106.19	4
Eastside Residential	1906	305.43	13
Heavy Industrial	479	790.47	33
Light Industrial	237	221.58	9
Detention Basins and Parks	6	91.14	4
Public/Quasi-Public	19	78.54	3
Sub Total	4,108	1,983.61	83
Streets	n/a	423.53	17
Grand Total		2,407.14	100

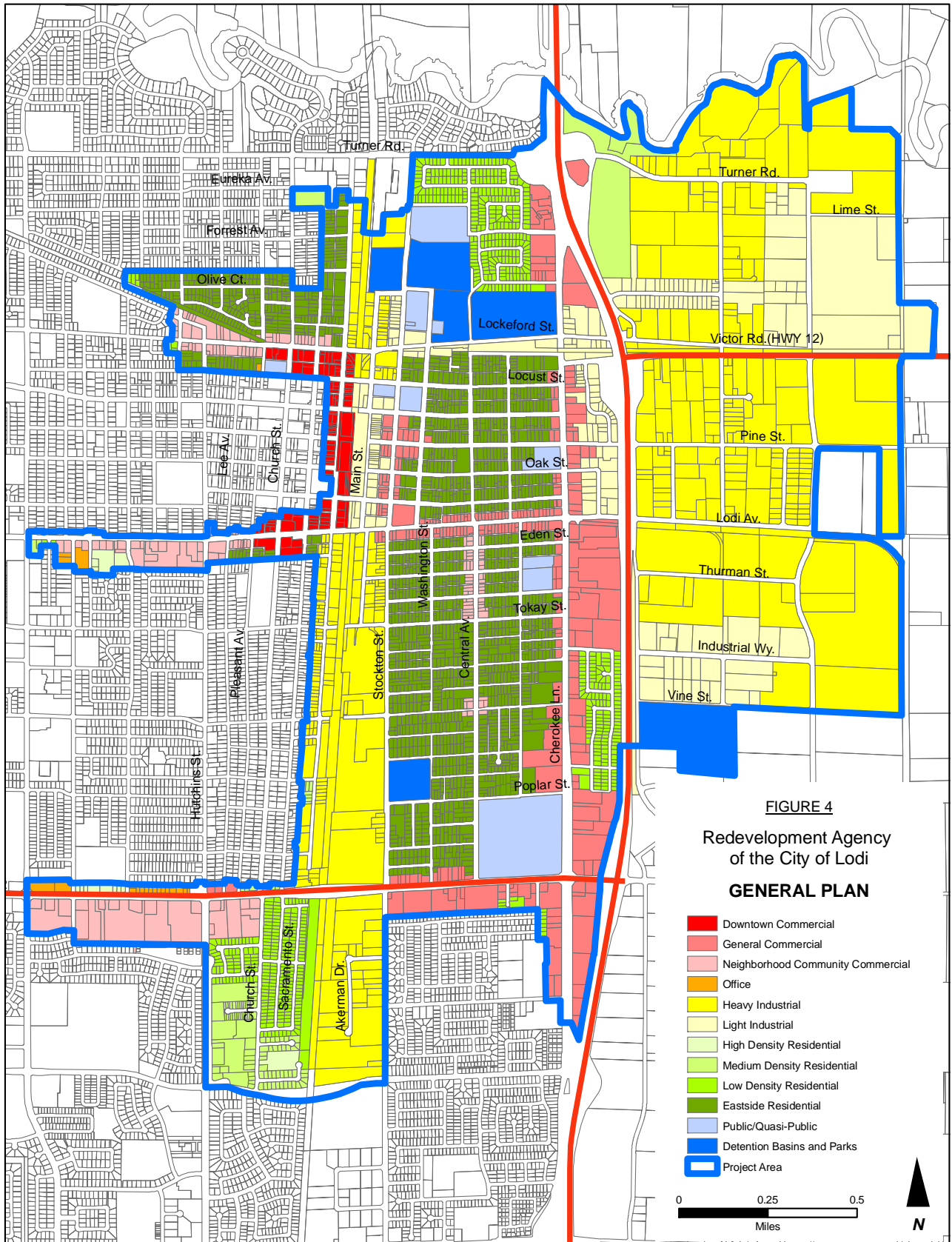
As shown in Table 3, the General Plan anticipates that amount of industrial land will increase, and residential and commercial will decrease somewhat. At build-out of the Project Area, the General Plan expects that 44% of the land will be industrial, 11% commercial, 21% residential, and 7% public/institutional⁹.

As shown in Figure 4, most of the planned industrial land will remain on the east side of the Project Area, and along Main Street and the railroad tracks. Most of the planned residential land will remain in the central and western portions of the Project Area. Most of the commercial will remain along the Highway 99 and the major arterial

⁹ Industrial includes heavy (33%), light (9%); commercial includes downtown (1%), general (7%) and neighborhood (3%); residential includes high (< 1%), medium (4%), low (4%), eastside (13%); public/institutional includes detention basins and parks (4%) and public/quasi-public (3%).

roadways, including Lodi Avenue, Cherokee Lane and West Kettleman Lane. Most of the planned public and institutional uses will remain scattered throughout the Project Area.

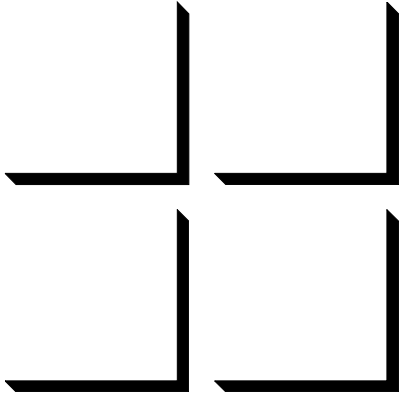
These General Plan designated land uses are the basis for assessing the future development potential of the Project Area and associated environmental impacts.



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4.0 EXISTING CONDITIONS, IMPACTS AND MITIGATION MEASURES

This section describes the existing conditions, potential significant adverse impacts, and mitigation measures related to the Project. Specifically, this section focuses on relevant issues associated with the following environmental topics, which are more fully described in Section 2.2.4 of this EIR. These impacts are as follows:

1. Land Use and Planning (inclusive of potential impacts to agricultural resources)
2. Population and Housing
3. Traffic
4. Air Quality
5. Public Services
6. Utilities
7. Cultural Resources.

Each environmental factor is discussed separately under its own section. Each discussion begins with a description of the existing conditions of the Project site relative to the specific environmental factor. This background information is critical to accurately assess the Project's impacts.

Next, the thresholds of significance used to measure potential Project impacts are identified. Thresholds of significance are based on the CEQA Guidelines, information provided by the Project Initial Study (Appendix A), the City *General Plan* and other regulatory requirements as appropriate.

The potentially significant environmental impacts of adopting and implementing the Project are then discussed and evaluated against the threshold of significance. For each significant impact, appropriate mitigation measures are presented. Any significant impact that cannot be fully mitigated is identified and discussed.

Finally, any cumulative impacts associated with the specific environmental factor are identified. Where appropriate, measures to mitigate any cumulative impacts are presented, and any cumulative significant impact that cannot be fully mitigated is identified and discussed.

4.1 LAND USE AND PLANNING

This section addresses issues related to land uses and potential land use changes within the Project Area. Potential adverse Project impacts, if any, and appropriate mitigation measures necessary to resolve impacts are discussed.

4.1.1 Existing Conditions

Existing Land Uses

Existing land uses within the 2,407 acre Project Area are depicted in Table 2 and Figure 3, Section 3.5.3. Existing land uses are mixed, with industrial comprising 27% of the total area, residential 23%, commercial 14%, and public/institutional 12%.

Existing Agriculture

According to the San Joaquin County Important Farmland Map¹⁰, the Project Area is designated as Urban, containing no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), in the Project Area. According to a review of the assessor parcel rolls conducted in support of the Redevelopment Plan efforts¹¹, there are no known Williamson Act contracts in the Project Area.

Preliminary field studies prepared in support of the Project, identified approximately 25 acres of vineyards in the Project Area, which are located on various parcels in the eastern edge of the Project Area. These vineyards are surrounded by industrial uses and are located on land designated by the City General Plan and Zoning Map for urban land uses. These properties are identified in Figure 3 as vacant parcel.

Existing Blighting Conditions

As discussed in Section 3.5.1, blighting conditions are expected to qualify the Project Area as a redevelopment project area. Identified blighting conditions include:

- Buildings that are unsafe or unhealthy in which to live or work

¹⁰ http://www.sjmap.org/mapdocs/FrontCounter_Important_Farmland.pdf; accessed 1/23/08

¹¹ *Feasibility Study for a Potential Redevelopment Project in East Lodi, October 19, 2007, GRC Redevelopment Consultants, Inc.*

- Conditions that prevent or substantially hinder the viable use of buildings or lots
- Incompatible uses that prevent economic development
- Parcels of irregular size or shape
- Depreciated or stagnant values
- Vacancies, low lease rates, and abandoned buildings
- High crime rate.

The Agency has become aware that these conditions are slowing the development of the Project Area.

Surrounding Land Uses

Areas west and south of the Project Area are predominantly residential and located within the City boundaries. Areas north and east of the Project Area are predominantly agriculture and are located within unincorporated San Joaquin County.

General Plan Land Uses

As currently planned under the City General Plan, the Project Area would remain a mix of industrial, residential, commercial and public and institutional land uses. At build-out, the General Plan anticipates that amount of industrial land will increase, and residential and commercial will decrease somewhat. These City planned land uses are depicted in Table 3 and Figure 4, above.

Policy Setting

General Plan Policies

The City General Plan recognizes the need to revitalize its older residential neighborhoods and industrial and commercial areas.

Goal A.4 of the City Land Use and Growth Management Element promotes reinvestment in downtown Lodi and in the Eastside area that upgrades the general quality of development in these areas.

Goal B. 4 and 5 of the City Housing Element encourages the revitalization of older neighborhoods, and the reconstruction of existing housing in the Eastside area and in commercially or industrially designated areas.

Regional Planning

The County, along with several other counties and the San Joaquin Council of Governments, is part of the San Joaquin Valley Blueprint Planning Process. The goal of this planning process is to coordinate infrastructure plans in the San Joaquin Valley with local community goals, provide a comprehensive and integrated decision-making tool by

assembling currently separate and distinct data sets into a single one that allows for scenario planning, more efficient use of resources, and an understanding of regional impacts and solutions, and allow each county in the San Joaquin Valley to maximize resources by utilizing the same data and expertise base to make planning decisions.

**4.1.2
Threshold of
Significance**

Significant impacts relative to land use and planning are evaluated in this section based on CEQA Guidelines, as described in the Project Initial Study and assessed by the following questions:

- Would the Project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to regional plans, the general plan, and zoning ordinance)?
- Would the Project be incompatible with existing land use in the vicinity?
- 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?

**4.1.3
Potential Impacts**

The Project consists of the adoption and implementation of the Redevelopment Plan.

**Applicable Land Use
Plan Impacts**

General Plan

Redevelopment plans such as the Redevelopment Plan are not land use proposals. Rather the plans are enabling tool to be used by the redevelopment agency for the purpose of encouraging the rehabilitation and upgrading of blighted areas.

The proposed Redevelopment Plan is in fact an implementation measure of the City General Plan which, as noted above, recognizes revitalization as an essential tool for ensuring the long term quality of Lodi's residential neighborhoods and industrial and commercial areas.

Future development that occurs within the Redevelopment Project Area would be consistent with the City General Plan. The Redevelopment Plan will incorporate the General Plan, not replace it. It will not alter expected densities from that already anticipated in the General Plan.

Through the Redevelopment Plan, land uses are expected to change over time as new growth and redevelopment occur. Ultimately, the Redevelopment Plan is expected to remove blighting conditions and strengthen the residential, industrial and commercial base in the

Project Area. These activities will conform to the General Plan and to applicable environmental plans or policies.

As part of the Redevelopment Plan, the Agency would use its authority to encourage new development by facilitating public private partnerships that can assist with land assembly, site preparation, offsite improvements, disposition of property, hazardous waste remediation and relocation assistance to existing property owners and tenants. A number of these programs are housing related, working to increase, improve, and preserve low- and moderate-income housing. The Agency may also acquire property and resell it to developers at the fair reuse value of the property. Through these efforts, the Agency will work toward alleviating blighting conditions in the Project Area.

Implementation of the Redevelopment Plan will help encourage development in conformance with the General Plan. The Redevelopment Plan is not expected to conflict with any applicable land use plan, policy, or regulation.

By providing a new source of funding to remove barriers to revitalization and new development, the Redevelopment Plan could accelerate the rate at which existing underutilized properties in the Project Area convert to their General Plan designated land uses, and enable properties to redevelop that otherwise would not. This acceleration is not expected to conflict with General Plan land use policies.

Regional Planning

The Project proposes no changes to planned land uses or other General Plan policies, including traffic and infrastructure system policies. Consequently, the Project is expected to be consistent with applicable policies of the San Joaquin Valley Blueprint Planning Process.

Incompatible Land Use Impacts

The Project would not change the proposed General Plan land uses permitted in the Project Area. One of the goals of the Redevelopment Plan is to alleviate problems associated with uses that do not conform to the General Plan or are incompatible with adjacent uses. The Project is not expected to be incompatible with land uses in or adjacent to the Project Area.

Conversion of Agricultural Land to Non-agricultural Use

Although the portions of San Joaquin County, including Lodi, were historically agricultural, the Project Area is presently fully urbanized. The existing properties which contain vineyards are only moderately productive and generally appear as poorly or not maintained and

vacant parcels. The parcels have been designated by the City General Plan Land Use Map for industrial uses.

Because the Project is expected to accelerate the conversion of non-conforming properties to their General Plan use, the Project is expected to accelerate conversion of these vacant parcels containing vineyards to industrial use. However, as discussed above, the San Joaquin County Important Farmland Map designates the Project Area as Urban. Consequently, although there is limited agricultural use on these parcels, they do not meet the definition of Farmland. Consequently, potential for impacts relative to the conversion of agricultural land to non-agricultural land is considered less than significant.

**4.1.4
Cumulative Impacts -
Land Use and Planning**

The Project would be consistent with applicable City General Plan and regional land use policies. Each future development in the vicinity of the Project Area will undergo a similar project review process as the proposed Project to preclude potential land use and planning policy conflicts. The Project is not expected to result in significant adverse cumulative impacts relative to land use and planning.

**4.1.5
Conclusions:
Potential Impacts -
Land Use and Planning**

The proposed Redevelopment Plan would incorporate the City General Plan, as it may be amended from time to time. For example, if a block is designated in the City General Plan for low density residential development, the Agency is required to uphold that designation.

The Project is not expected to conflict with applicable land use plans, be incompatible with existing land use in the vicinity of the Project Area, or result in significant conversion of Farmland, to non-agricultural use.

**4.1.6
Mitigation Measures**

None required.

**4.1.7
Significance After
Mitigation**

Less than significant

**4.2
POPULATION
AND HOUSING**

This section addresses issues related to population and housing within the Project Area. Potential adverse Project impacts, if any, and appropriate mitigation measures necessary to resolve impacts are discussed.

**4.2.1
Existing Conditions**

According to the State Department of Finance January 2007 City/County Population and Housing estimates, Lodi has a population of 63,395 persons and 23,253 housing units. Within the Project Area, as shown in Table 2, there is currently approximately 548 acres of residential land (combined total for multi-family, single-family and mobile home park). Approximately 25% of the City's population lives in the Project Area.

Within the existing residential areas of the Project Area, conditions of blight include dilapidated condition, incompatible land uses, hazardous materials, and stagnant or declining property values

**4.2.2
Threshold of
Significance**

Significant impacts relative to population and housing are evaluated in this section based on CEQA Guidelines, as described in the Project Initial Study and assessed by the following question:

- Would the Project induce substantial 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)?

**4.2.3
Potential Impacts**

As discussed under section 4.1.3, the proposed Project is not a land use proposal. Rather, it is an enabling tool to be used by the Agency for the purpose of raising funds to encourage the rehabilitation and upgrading of currently underutilized land to more efficient uses with greater economic potential. Future construction activities will occur in accordance with the General Plan and applicable regional plans.

Although redevelopment activities may accelerate the rate of development, they are not expected to increase the density of population beyond that permitted by the General Plan. As such, the Project is not expected to induce substantial population growth.

Some displacement of residents could occur because of the redevelopment activities. However, the Lodi Community Improvement Project will not include the ability to acquire property through eminent domain, and funds raised through the Redevelopment Plan will be available to assist with relocation of residents in accordance with the Relocation Assistance Guidelines adopted by the Agency.

The Redevelopment Plan proposes a series of Housing Programs to increase, improve, and preserve low- and moderate-income housing. Through the Project, the Agency intends to implement the following types of projects:

- First time homebuyers / downpayment assistance program
- Housing Rehab Loan Program

- Senior Housing
- Workforce Housing Development.

**4.2.4
Cumulative Impacts -
Population and
Housing**

The Project would be consistent with applicable City General Plan and regional land use policies. Each future development in the vicinity of the Project Area will undergo a similar project review process as the proposed Project to preclude potential population and housing impacts. The Project is not expected to result in significant adverse cumulative impacts relative to population and housing.

**4.2.5
Conclusions:
Potential Impacts -
Population and
Housing**

The proposed Redevelopment Plan would incorporate the City General Plan, as it may be amended from time to time. The Project is not expected to induce substantial population growth in an area, either directly or indirectly.

**4.2.6
Mitigation Measures**

None required.

**4.2.7
Significance After
Mitigation**

None.

**4.3
TRAFFIC**

This section of the EIR discusses existing vehicular traffic in the vicinity of the Project site, and summarizes the potential impacts to traffic flows from Project implementation. Potential adverse Project impacts, if any, and appropriate mitigation measures necessary to resolve impacts are discussed.

**4.3.1
Existing Conditions**

Lodi, along with other urban areas in California, has become increasingly subject to worsening traffic congestion. As the employment centers of Stockton, Sacramento, and, most recently, the Bay Area have come to rely on Lodi for housing, average commute times and miles traveled for Lodi residents have increased.

Existing Roadways

Within the Project Area, traffic and circulation problems have affected the proposed Project Area for a number of years. The Preliminary Report prepared in support of the Project notes that streets are in need of repairs. Streets lack adequate visibility into alleys and traffic blockages occur from lack of adequate access across the railroad tracks.

The main roadways serving the study area are listed below.

Regional Roadways:

The Project Area is primarily served by two regional roadways. SR 99 is a north-south limited-access highway that extends from Southern California to Sacramento. SR 99 has four lanes through the Project Area. SR 99 runs north-south across the Project Area.

West Kettleman Lane/State Route 12 (“SR 12”) is a State highway that continues east of Highway 99 through the Project Area along Victor Road. Kettleman Lane has one lane in each direction west of Lower Sacramento Road. East of Lower Sacramento Road, Kettleman Lane widens to provide two lanes in each direction all the way to SR-99. Kettleman Lane from Lower Sacramento Road to Sylvan Lane has three lanes in the westbound direction and two lanes in the eastbound direction.

Arterial Roadways:

Turner Road is an east-west arterial that extends from I-5 to the west to SR-99 to the east. It is a four-lane facility that is located along the northern edge of the Project Area.

Cherokee Lane is a four-lane roadway, planned to be widened or restriped to six lanes. Cherokee Lane is formally the 99 business route. It runs north-south, and is almost completely within the Project Area.

Lodi Avenue is a four-lane roadway that runs east west from Guild Avenue to Ham Lane within the Project Area.

Ham Lane is a north-south roadway located approximately one mile east of Lower Sacramento Road. It is a four-lane facility that extends from Turner Road. It is located at the westernmost edge of the Project Area.

4.3.2. Thresholds of Significance

Significant impacts relative to traffic are evaluated in this section based on CEQA Guidelines, as described in the Project Initial Study, and as assessed through the following questions:

- Would the Project cause an increase in traffic, which is substantial in relation to the existing traffic load and capacity of the street system?
- Would the Project exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?

4.3.3. Potential Impacts

Minor modifications to the layout and routing of existing streets and/or alleys may occur during the implementation process as part of the Plan. Other such changes may be proposed as redevelopment proceeds. It is expected that some street extensions and closures, paving, and other improvements, including the construction of curbs, gutters, and local drains, will occur.

The Plan is expected to facilitate build-out of the Project Area in conformance with the General Plan. Accordingly, all Project Area streets are expected to be built-out to the ultimate capacity as indicated in the General Plan.

The proposed Redevelopment Project will support recommended General Plan improvements by including reconstruction and construction of roads and streets within its expected list of public service infrastructure improvements. Funds generated through the Plan would be available to assist construction of needed circulation improvements.

The Preliminary Report identifies the following circulation related activities that will be available for redevelopment funds:

- Curb, gutter and sidewalk construction
- Street reconstruction
- Streetlight installation
- Traffic signalization.
- Alley improvements
- Streetscape improvements
- Soundwalls
- Pedestrian improvements

Future increases in traffic volumes will result primarily from cumulative development throughout the Project Area, which are a function of the General Plan's land use and circulation policies.

Comments from Caltrans and County Public Works in response to the NOP requested that all improvements within the County right-of-way be in conformance with the current Improvement Standards and Specification of the County, and that an Encroachment Permit be obtained for work within the County right-of-way¹². Caltrans also requested that as development projects come forward that could impact state highway facilities, they be required to provide traffic impact studies ("TIS"). Each TIS should be prepared in accordance

¹² Correspondence from Department of Transportation, Tom Dumas Chief, dated March 7, 2008, and County of San Joaquin Public Works, Mark Hopkins, Environmental Coordinator, dated March 10, 2008; contained in Appendix B.

with the *Caltrans Guide for Preparation of Traffic Impact Statements*, and that the developer submit a scope of work to Caltrans for review and approval prior to study commencement.

Each of these items requested are consistent with existing City and regional policies, and are requirements of any development that would occur within the County right-of-way. The Project does not propose any specific improvements within the County right-of-way. However should future development activities affect County right-of-way, all such work would be required by regional policies to comply with Caltrans and County Public Works specifications, including obtaining appropriate encroachment permits and conducting appropriate TIS analysis.

Consequently, Project impacts relative to traffic would be less than significant and no mitigation is required.

4.3.4
Cumulative Impacts –
Traffic

As noted above, any development in the Project Area will be compatible with the City General Plan and regional planning policies. Cumulative and indirect traffic impacts of future development are expected to be mitigated through the payment of various impact mitigation fees to the extent that these programs provide funding for the improvement of facilities impacted by development. Therefore, cumulative impacts relative to traffic or circulation are associated with the Project are expected to be less than significant.

4.3.5
Conclusions:
Potential Impacts –
Traffic

As noted above, future increases in traffic volumes will result primarily from cumulative development throughout the Project Area, which are a function of the General Plan's land use and circulation policies. The Project will provide a new source of funding to contribute to planned traffic improvements. Implementation of the proposed Redevelopment Project will result in less than significant impacts on Project Area and region-wide roadways.

4.3.6
Mitigation Measures

None Required.

4.3.7
Significant After
Mitigation

Less than significant.

4.4 AIR QUALITY

This section addresses issues related to air quality. Potential adverse Project impacts, if any, and appropriate mitigation measures necessary to resolve impacts are discussed.

4.4.1 Existing Conditions

Correspondence received from the SJVAPCD in response to the NOP, requested that the environmental review for the project contain a description of the regulatory environment and existing air quality conditions¹³. This information is provided below:

Climatology

Climate of the San Joaquin Valley Air Basin (“SJVAB”), which encompasses the City and the Project Area, is warm and dry in the summers and cool in the winters. The average mean temperature over a 30-year period is 65°F. High daily temperature readings in summer average around 95°F. Low daily temperature reading is winter averages 45°F.

The SJVAB has an “inland Mediterranean” climate that averages over 260 sunny days per year, primarily because semi-permanent high pressure systems establish themselves over the SJVAB and deflect low-pressure systems that might otherwise bring rain and winds.

During the daytime, surface winds enter the SJVAB primarily from the north through the San Francisco Bay area as well as other locations through passes in the coastal range. The air picks up ozone precursors emitted in the Bay Area and transports them down the valley where they eventually form ozone in the SJVAB. Precursor emissions from SJVAB are also transported down the valley where they are converted to ozone. Also during the daytime, heated air rises into the mountains and transports ozone and other pollutants up the Sierra Nevada and coastal mountains.

Air Quality Regulations

The federal Clean Air Act (“CAA”) requires the United States Environmental Protection Act (“EPA”) to identify National Ambient Air Quality Standards (“NAAQS”) to protect public health and welfare. NAAQS have been established for the six “criteria” air pollutants including ozone (O₃), carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), suspended particulate matter (PM₁₀, PM_{2.5}), and lead (Pb), so-called because the standards were based on a health criteria document. The NAAQS criteria by pollutant type is set forth in Table 4, below; a description of each pollutant type and its effects follows.

¹³ Correspondence San Joaquin Valley Air Pollution Control District, Arnaud Marjollet, Permit Services Manager, dated February 26, 2008, contained in Appendix B.

California began setting air quality standards in 1969 with the passage of the Mulford-Carrell Act, before NAAQS were established. Because of unique meteorological problems in the state and the differences of opinion from medical panels established by the California Air Resources Board (“CARB”) and the EPA regarding pollutant levels that protect susceptible members of the population from adverse health impacts with an adequate degree of safety, there are some considerable differences between state and federal standards currently in effect in California. In addition to its more stringent ambient air quality standards, California uses more stringent regulations than the federal government for vehicle emissions, under a program administered by CARB.

These California standards, summarized in Table 4, are the levels of air quality designed to protect those “sensitive receptors” most susceptible to respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise.

TABLE 4						
Lodi Community Improvement Project						
AMBIENT AIR QUALITY STANDARDS						
Pollutant	Averaging Time	California Standards		Federal Standards		
		Concentration	Method	Primary	Secondary	Method
Ozone	1 Hour	0.09 ppm (180 µg/m ³)	Ultraviolet Photometry	0.08 ppm (157 µg/m ³)	Same as Primary Std.	Ethylene Chemiluminescence
	8 Hour	0.070 ppm (137 µg/m ³)				
Carbon Monoxide	8 Hour	9.0 ppm (10 mg/m ³)	Nondispersive Infrared Spectroscopy (NDIR)	9 ppm (10 mg/m ³)	None	Non-dispersive Infrared Spectroscopy (NDIR)
	1 Hour	>20 ppm (23 mg/m ³)		35 ppm (40 mg/m ³)		
Nitrogen Dioxide	Annual Arithmetic Mean	---	Gas Phase Chemiluminescence	>0.053 ppm (100 µg/m ³)	Same as Primary Std.	Gas Phase Chemiluminescence
	1 Hour	0.25 ppm (470 µg/m ³)		---		
Sulfur Dioxide	Annual Arithmetic Mean	---	Fluorescence	0.030 ppm (80 µg/m ³)	---	Pararosaniline
	24 Hour	0.04 ppm (105 µg/m ³)		0.14 ppm (365 µg/m ³)	---	
	3 Hour	---		---	0.5 ppm (1,300 µg/m ³)	
	1 Hour	0.25 ppm (655 µg/m ³)		---	---	
Respirable Particulate Matter (PM ₁₀)	Annual Arithmetic Mean	20 µg/m ³	Gravimetric or Beta Attenuation	50 µg/m ³	Same as Primary Stds.	Inertial Separation and Gravimetric Analysis
	24 Hour	>50 µg/m ³		150 µg/m ³		
Respirable Particulate Matter (PM _{2.5})	Annual Arithmetic Mean	12 µg/m ³	Gravimetric or Beta Attenuation	15 µg/m ³	Same as Primary Stds.	Inertial Separation and Gravimetric Analysis
	24 Hour	No Separate State Standard		65 µg/m ³		
Visibility Reducing Particulates	8 Hour (10 a.m. to 6 p.m., PST)	In sufficient amount to produce an extinction coefficient of 0.23 per kilometer-visibility of 10 miles or more due to particulates when the relative humidity is less than 70 percent.		No Federal Standards		
Sulfates	24 Hour	25 µg/m ³	Turbidimetric Barium Sulfate	No Federal Standards		
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m ³)	Cadmium Hydroxide STRACTAN	No Federal Standards		
Lead	30-Day Average	1.5 µg/m ³	Atomic Absorption	---	---	High Volume Sampler and Atomic Absorption
	Calendar Quarter	---		1.5 µg/m ³	Same as Primary Std.	

Ozone (O₃) - O₃ is one of a number of substances called photochemical oxidants that are formed when reactive organic gases (ROG) and NO_x, both byproducts of the internal combustion engine, react in the presence of ultraviolet sunlight. O₃ is present in relatively high concentrations in the air basin, and the damaging effects of photochemical smog are generally related to the concentrations of O₃. O₃ may pose its worst health threat to those who already suffer from respiratory diseases. This health problem is particularly acute in sensitive receptors such as the sick, the elderly, and young children. O₃ levels peak during the summer and early fall months.

Carbon Monoxide (CO) - CO is a colorless, odorless, toxic gas which is produced by incomplete combustion of carbonous substances (e.g., gasoline or diesel fuel). The primary adverse health effect associated with CO is the interference of normal oxygen transfer to the blood which may result in tissue oxygen deprivation.

Fine Particulate Matter – Fine particulate matter consists of finely divided solids or liquids such as soot, dust, aerosols, fumes, and mists. Two forms of fine particulate are now recognized. Course particles, or PM₁₀, include that portion of the particulate matter with an aerodynamic diameter of 10 microns (i.e., ten one-millionths of a meter or 0.0004 inch) or less. Fine particles, or PM_{2.5}, have an aerodynamic diameter of 2.5 microns (i.e., 2.5 one-millionths of a meter or 0.0001 inch) or less. Particulate discharge into the atmosphere results primarily from industrial, agricultural, construction, and transportation activities. However, wind action on the arid landscape also contributes substantially to the local particulate loading. Both PM₁₀ and PM_{2.5} may adversely affect the human respiratory system, especially in those people who are naturally sensitive or susceptible to breathing problems.

Nitrogen Dioxide (NO₂) - NO₂ is a byproduct of fuel combustion. The principle form of NO₂ produced by combustion is nitric oxide (NO), but NO reacts quickly to form NO₂, creating the mixture of NO and NO₂ commonly called NO_x. NO₂ acts as an acute irritant and, in equal concentrations, is more injurious than NO. At atmospheric concentrations, however, NO₂ is only potentially irritating. There is some indication of a relationship between NO₂ and chronic pulmonary fibrosis. Some increase in bronchitis in children (2 and 3 years old) has also been observed at concentrations below 0.3 parts per million (ppm). NO₂ absorbs blue light, the result of which is a brownish-red cast to the atmosphere and reduced visibility. NO₂ also contributes to the formation of PM₁₀.

Sulfur Dioxide (SO₂) - SO₂ is a colorless, pungent, irritating gas formed by the combustion of sulfurous fossil fuels. Fuel combustion is the primary source of SO₂. At sufficiently high concentrations, SO₂ may irritate the upper respiratory tract. At lower concentrations and when combined with particulates, SO₂ may do greater harm by injuring lung tissue.

Lead (Pb) - Pb in the atmosphere occurs as particulate matter. In the past the combustion of leaded gasoline was the primary source of lead emissions. Other sources of lead include the manufacturing of batteries, paint, ink, ceramics, and ammunition, and secondary lead smelters. With the phase-out of leaded gasoline, secondary lead smelters and battery recycling and manufacturing facilities are becoming lead emission sources of greater concern. Prolonged exposure to atmospheric lead poses a serious threat to human health.

Reactive Organic Gases - ROG's are compounds comprised primarily of atoms of hydrogen and carbon. Internal combustion associated with motor vehicles is the major source of hydrocarbons. Adverse effects on human health are not caused directly by ROG, but rather by reactions of ROG to form secondary air pollutants including O₃. Note that for the purposes of this analysis, ROG, reactive organic compounds (ROC), volatile organic compounds (VOC), hydrocarbons (HC), precursor organic compounds (POC), and non-methane hydrocarbons (NMHC), are used synonymously.

Fugitive Dust - Fugitive dust poses primarily two public health and safety concerns. The first concern is that of respiratory problems attributable to the suspended particulates in the air. The second concern is that of motor vehicle accidents caused by reduced visibility during severe wind conditions. Fugitive dust may also cause significant property damage during strong wind storms by acting as an abrasive material agent (much like sandblasting activities).

Attainment Areas

The Project Area is within the SJVAB, which includes San Joaquin, Stanislaus, Merced, Fresno, Kings, Tulare, and Kern Counties. Air quality conditions in the SJVAB are under the jurisdiction of the SJVAPCD. The SJVAB exceeds the state and federal standards for two of the six criteria air pollutants. The entire air basin is non-attainment for ozone and particulate levels (PM₁₀ and PM_{2.5}).

With respect to the State ozone standards, the SJVAB is designated as "non-attainment" of the 1-hour ozone standard. To this end, the SJVAPCD submitted the 2004 Extreme Ozone Attainment Demonstration Plan ("OADP") to the USEPA on November 15, 2004. The OADP sets forth the emission reductions and timeline for attaining the federal 1-hour ozone ambient air quality standards in the SJVAB by November 15, 2010. The SJVAPCD, in conjunction with the CARB, the EPA, and the eight regional Transportation Planning Agencies (TPAs) in the Valley, developed this plan to provide healthy air for all of the Valley's people and to meet federal and state requirements for ozone planning documents.

In 1997, EPA determined that the 1-hour standards were not needed to protect public health given the promulgation of the 8-hour standards. On April 15, 2004 EPA issued a final rule revoking the 1-

hour standards, effective June 15, 2005. Areas in the United States where ozone levels measured in the ambient air exceed the 1-hour standards of 0.12 ppm are said to be in nonattainment of the standards. An area complies with the federal 1-hour ozone standards when measured 1-hour average ozone levels at any given monitoring station do not exceed 0.12 ppm more than one day per year over any consecutive three-year period.

Ozone levels measured in the SJVAB's atmosphere in 2003 exceeded the federal 1-hour ozone standards on 37 days, which was a slight increase above 2002 levels. In addition, for the period 2001—2003, eight monitoring sites experienced more than three exceedances of the federal 1-hour ozone standards, with one site (Arvin) experiencing more than 50 exceedances and another site (Parlier) experiencing more than 40 exceedances. The overall 1-hour ozone design value for the SJVAB in 2003 was 0.15 ppm and various monitoring stations located within the SJVAB continue to exceed the 1-hour standard to date. These data reflect the pervasiveness of the SJVAB's 1-hour ozone nonattainment problem.

On April 15, 2004, EPA designated and classified the SJVAB as serious nonattainment for the federal 8-hour ozone standard, effective June 15, 2004. As a serious area, the Valley is to attain the standard as expeditiously as practicable, but no later than June 15, 2013. The District Governing Board adopted the 2007 Ozone Plan on April 30, 2007. This far-reaching plan, with innovative measures and a “dual path” strategy, assures expeditious attainment of the federal 8-hour ozone standard for all Valley residents. The 2007 Ozone Plan, the first 8-hour ozone plan for the SJVAB was due to EPA by June 15, 2007. Following receipt of a Plan, the EPA must find the Plan complete within six months of receipt. The EPA must approve, disapprove, partially approve, or conditionally approve the plan within one year of finding the plan complete.

Although this is the first plan for 8-hour ozone in the Valley, the District Governing Board has adopted ozone plans in the past, culminating with the Extreme Ozone Attainment Demonstration Plan for the 1-hour ozone standard on October 8, 2004 and adopted amendments on October 20, 2005. On June 15, 2005, EPA revoked the federal 1-hour ozone standard. As such, transportation conformity and de minimis thresholds for 1-hour ozone no longer apply, contingency measures are not needed, and EPA will not make a finding of a failure to attain. However, other requirements still apply, including anti-backsliding provisions, rate of progress reductions, reasonably available control technology (RACT) controls, and “black box” measures (provisions of an Extreme Area's implementation plan that anticipate development of new control techniques or improvement of existing control technologies). Control measures cannot be removed from the State Implementation Plan (SIP) solely because of

revocation, and the measures included in the 1-hour ozone plan will also contribute to the SJVAQMD's 8-hour ozone strategy.

With respect to particulate matter, the SJVAB is designated as "serious" non-attainment for federal PM10 standards and was required to reach attainment of the annual and 24-hour standards by December 31, 2001. The SJVAPCD failed to attain the 24-hour and annual standards by that date, and was required to submit a new plan by December 31, 2002 to demonstrate attainment at the earliest practicable date.

On June 19, 2003, the Governing Board of the SJVAQMD adopted the 2003 PM10 Plan, which presents the SJVAQMD's strategy for attaining the National Ambient Air Quality Standards for particulate matter with a diameter of 10 microns or less (PM10) in the Valley by December 31, 2010. CARB approved this plan on June 26, 2003 and transmitted it to the EPA for approval. On December 18, 2003, the SJVAQMD adopted amendments to the 2003 PM10 Plan, and CARB subsequently transmitted these amendments to EPA. On May 26, 2004, EPA approved the 2003 PM10 Plan as amended. The SJVAQMD, CARB, and local governments began implementing measures in the 2003 PM10 Plan to improve PM10 air quality, which resulted in a decline in PM10 air pollution in the Valley.

On February 16, 2006, the SJVAQMD fulfilled a commitment in the 2003 PM10 Plan by adopting the 2006 PM10 Plan, which reexamines the overall Valley PM10 control strategy with updated emissions information, air quality data, and air quality modeling to determine if adjustments were needed to the strategy. The 2006 PM10 Plan reaffirmed the 2003 PM10 Plan control strategy and noted that updated information indicated that the Valley was on track to attain the PM10 NAAQS before the 2010 deadline.

On April 24, 2006, the SJVAQMD transmitted to CARB a Request for Determination of PM10 Attainment for the San Joaquin Valley, which supplied detailed technical information and monitoring data showing that the Valley had attained the PM10 NAAQS. CARB concurred with this request and transmitted it to EPA on May 8, 2006. On October 30, 2006, EPA issued a Final Rule determining that the Valley had attained the NAAQS for PM10. EPA noted in its Final Rule that "This action does not constitute a redesignation to attainment" under Section 107(d)(3) of the federal Clean Air Act because other federal Clean Air Act requirements for redesignation have not yet been met.

Table 5 presents the attainment status for the SJVAB.

TABLE 5		
Lodi Community Improvement Project		
ATTAINMENT STATUS FOR THE SJVAB		
Pollutant	Designation/Classification	
	Federal Standards	State Standards
Ozone - One hour	No Federal Standard	Nonattainment/Severe
Ozone - Eight hour	Nonattainment/Serious ¹	Nonattainment
PM ₁₀	Nonattainment/Serious ²	Nonattainment
PM _{2.5}	Nonattainment ³	Nonattainment
Carbon Monoxide	Attainment/Unclassified	Attainment/Unclassified
Nitrogen Dioxide	Attainment/Unclassified	Attainment
Sulfur Dioxide	Attainment/Unclassified	Attainment
Lead (Particulate)	No Designation/Classification	Attainment
Hydrogen Sulfide	No Federal Standard	Unclassified
Sulfates	No Federal Standard	Attainment
Visibility Reducing Particles	No Federal Standard	Unclassified
Vinyl Chloride	No Federal Standard	Attainment

Global Warming / Greenhouse Gases

Global warming, or climate change, is caused by the interaction of various gases in our environment, including water vapor, carbon dioxide, methane, nitrous oxides, chlorofluorocarbons, hydroflourocarbons, sulfur hexafluoride and ozone. Human contribution to global warming is primarily from Carbon Dioxide emission. About 40% of U.S. carbon dioxide emissions stem from the burning of fossil fuels for the purpose of electricity generation. About 20% of U.S carbon dioxide emissions comes from the burning of gasoline in cars and light trucks.

Because of the persistence and mixing of these gases in the atmosphere, emissions anywhere in the world have the potential to impact the climate. As a result, the potential impact of greenhouse gas emissions produced in California has the potential to impact not only California, but also the rest of the world.

There is broad scientific consensus that the increased concentrations of greenhouse gases in the atmosphere will lead to global climate change in this century. Over time, the increased temperature will result in climate change effects such as rising sea levels, altering precipitation patterns, and changing water supplies and crop yields. Global warming could also adversely affect human health, harm wildlife, and damage fragile ecosystems. Higher atmospheric temperatures would also result in more emissions, increased smog levels, and the associated health impacts.

In June 2005, Governor Schwarzenegger signed AB 32 - California Global Warming Solutions Act of 2006, which directs the California EPA to work with state agencies to establish the following greenhouse gas targets:

- By 2010, reduce greenhouse emissions to 2000 emission levels
- By 2020, reduce greenhouse emissions to 1990 emission levels
- By 2050, reduce greenhouse gases to 80% below 1990 levels.

The target for 2020 was recently codified into the State law through AB32. The emission levels in California were estimated to be 426 million metric tons CO₂ equivalent for 1990, 473 million metric tons CO₂ equivalent for 2000, 532 million metric tons CO₂ equivalent for 2010, and 600 million metric tons CO₂ equivalent for 2020. AB32's goals for emission reductions were estimated to be approximately 59 and 174 million tons CO₂ equivalent by 2010 and 2020, respectively. Achieving AB32's target would require significant development and implementation of energy efficiency technologies and extensive shifting of energy production to renewable sources. In addition to reducing greenhouse gas emissions, such strategies would concurrently reduce emissions of criteria pollutants associated with fossil fuel combustion.

Energy The CEQA Statutes provide that EIRs shall include a detailed statement on significant effects of a project and mitigation measures proposed to minimize significant effects on the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy (Public Resources Code §21000(b)(3)). To address this topic, the following discussion addressed the three most relevant sources of energy associated with redevelopment activities in the Project Area: electricity; natural gas; and transportation fuel for vehicle trips¹⁴.

¹⁴ Draft Environmental Impact Report, Lodi Shopping Center, prepared by Pacific Municipal Consultants, August 2004.

Electricity

In 2005, California used over 288,000 gigawatt hours of electricity (of which approximately 470 gigawatts were consumed by residential and non-residential users in the City). This electricity was produced from power plants fueled by natural gas (38 percent), coal (20 percent), hydro (17 percent), nuclear (14 percent), and renewables (including wind, solar, biomass, and geothermal (11 percent). Approximately 78 percent of the electricity was generated within California, with the balance imported from other states, Canada, and Mexico.

Electricity supply in California involves a complex grid of power plants and transmission lines located in the Western United States, Canada, and Mexico. The issue is complicated by market forces that have become prominent since 1998, which is when a new regulatory environment commonly referred to as "deregulation" took effect in California. Supply is further complicated by the fact that the peak demand for electricity is significantly higher than the off-peak demand.

In an effort to minimize power shortages, the California Energy Commission (CEC) and California Public Utilities Commission (CPUC) have initiated a number of programs to increase supplies and reduce demand for electricity. On the demand side, they are strongly encouraging reductions in electricity demand through energy-efficiency measures, particularly those that provide peak demand savings. For example, the recently passed SB 1307 requires all electric utilities to meet their unmet resource demands first through energy efficiency and demand reduction. In addition, the Governor's Green Building Initiative sets a goal of reducing energy use in State-owned buildings by 20 percent by 2015, and directs the CEC to refine Title 24 energy efficiency standards for building to meet the same requirements.

As part of AB 32 - California Global Warming Solutions Act of 2006, state agencies are directed to implement a cap on greenhouse gas emissions (primarily carbon dioxide) from stationary sources of such as electric power generation facilities, and industrial, commercial and waste disposal sectors. Since carbon dioxide emissions are directly proportional to fossil fuel consumption, the cap on emission is expected to have the incidental effect of forcing a reduction in fossil fuel consumption from these on the supply side, the CEC and CPUC are actively promoting alternative energy sources such as solar, wind, and bioenergy (including "transformation" or waste-to-energy, which converts agricultural byproducts such as animal waste to usable energy)? In January 2006, the CPUC approved the California Solar Initiative under which the CEC will manage a program of financial

incentives, involving cash rebates, for installation of solar electricity systems in new residential construction.

Electrical services to the City are provided by the Lodi Electric Utility, a City-owned and operated utility that serves residential, commercial and industrial customers in Lodi. The Lodi Electric Utility is a member of the Northern California Power Agency (NCPA), which is a collective comprised of utilities that own and operate their own power plants. Established in 1968, the NCPA is a California Joint Action Agency, with membership open to municipalities, rural electric cooperatives, irrigation districts and other publicly owned entities interested in the purchase, aggregation, scheduling and management of electrical energy. A total of 12 NCPA members, including the Lodi Electric Utility, own shares of the NCPA's electric generation facilities. The NCPA allows the Lodi Electric Utility to purchase and supply electricity at cost.

Electrical power infrastructure in the Project Area vicinity includes overhead electrical lines located along Lower Sacramento Road. The construction of an electrical substation is planned for a parcel located on the south side of West Kettleman Lane opposite the northwest corner of the project site. This is the City's fifth substation and has been planned for some time to provide service to the western portion of the City. The substation is scheduled for completion within the next five years. It is anticipated that the substation will be the terminus of two new 60 kV circuits mounted on a single pole line, paralleling Kettleman Lane (Highway 12). The substation would also be linked to an existing 60 kV overhead circuit paralleling Lower Sacramento Road. All 12 kV distribution lines from the substation would be placed underground

Natural Gas

In 2004, California used an average of over 6.2 billion cubic feet of natural gas per day (of which approximately 3,892 million cubic feet were consumed by residential and non-residential users in the City). The natural gas was used to produce electricity (50 percent), in industrial uses (18 percent), in commercial uses (9 percent), and in residential uses (22 percent). Approximately 13 percent of the natural gas was produced within California, with the balance imported from other states (64 percent) and Canada (24 percent). As noted, natural gas is used to generate almost 50 percent of electricity used in California. This results in peak seasonal demands for natural gas not only during the winter months for heating but also during the peak electricity demand period in summer when cooling needs are greatest.

Natural gas usage in California for differing land uses varies substantially by the type of uses in a building, type of construction

materials used in a building, and the efficiency of all gas consuming devices within a building.

According to the CEC 2005 Integrated Energy Policy Report, the current outlook is that nationwide natural gas production is expected to remain almost the same over the next decade and will not keep up with national growth in demand. This problem is compounded by steadily increasing demand for electricity, which is growing despite gains in energy efficiency. This directly affects the demand for natural gas, which is the predominant fuel used in electric power generation in California.

This problem will be further compounded by inclining in-state production, as well as a decline in imports from Canada because of its own increased demand for natural gas. Opportunities for alternative sources of supply are few. The most promising is the importation of liquefied natural gas (LNG), although the siting of LNG terminals within California has been problematic. To date, no LNG terminals have been constructed in California, although 3 have been approved for Los Angeles, and 6 more are proposed for southern California. However, the installation of LNG terminals in other states will increase overall domestic supplies (projected to comprise up to 22 percent of U.S. supply by 2016), thereby increasing the supply of natural gas available for import to California. In addition, several LNG terminals are planned in northern Mexico, although additional or modified pipelines may be needed to convey the gas to California markets.

Reductions in natural gas use in residential and non-residential buildings have been implemented since 1978 through California's Energy Efficiency Standards for Residential and Non-Residential Buildings (Title 24), and since 1977 by the Appliance Efficiency Regulations (Title 20), which are updated regularly to reflect policy mandates and advances in feasible technologies. As noted above, the Governor's Green Building Initiative mandates a 20 percent overall reduction in energy consumption in buildings by 2015. Reductions in the natural gas usage are also expected through increased efficiencies in the generation of electricity, and through efforts to increase the use of alternative sources of power.

The Pacific Gas and Company (PG&E) provides natural gas service to the City. PG&E serves approximately 4 million consumers with natural gas service within a 70,000 square-mile service area in southern and central California. PG&E delivered approximately 900 billion cubic feet of natural gas in 2004.

Approximately five percent of the company's natural gas supplies originate in California. The remaining 95 percent is piped via high-pressure transmission pipelines from out-of-state gas fields in the

Southwest and Rocky Mountain regions, and western Canada. A representative of PG&E's Service Planning Group in Stockton indicated that there are abundant supplies available from these supply sources and that no interruptions to supply are anticipated or foreseen which would prevent the utility from meeting the growing demand for natural gas associated with continuing growth in Lodi .

PG&E owns and operates 40,000 miles of distribution pipeline, 6,000 miles of transmission. Most natural gas supplies to Lodi are conveyed through long-distance transmission lines from western Canada. A small portion of supply is piped from the Rio Vista gas field to the west. The company owns several large gas storage facilities which are important in balancing supply and demand and maintaining reliability of service. Emergency natural gas supplies for the City are stored at the nearby McDonald Island natural gas storage field. Although the privately owned Lodi natural gas storage field is located nearby to the north, PG&E does not currently use this facility for natural gas storage.

Transportation Fuel

In 2004, Californians consumed about 15.4 billion gallons of gasoline and 2.8 billion gallons of diesel fuel, an increase of nearly 50 percent over the previous 20 years.¹⁹ Consumption gasoline and diesel by residential and non-residential users in the City was approximately 25.1 million gallons combined. During this period, the average fuel economy for the fleet of new light-duty vehicles (autos, pickups, vans, and SUVs) steadily increased from 13.1 miles-per gallon (mpg) for the 1975 model year to 21.0 mpg for the 2005 model year.²⁰ Although the average fuel economy of vehicles in the state has improved, the fuel savings achieved were overshadowed by the increased number of miles traveled, and the marked shift in personal vehicle preference, from the standard passenger automobile (sedan) toward larger vehicles such as sport utility vehicles (SUVs) and pick-up trucks.

According to the California Energy Commission's 2005 Integrated Energy Policy Report, the demand for gasoline is expected to increase to 18.2 billion gallons per year by 2025 (or 17 percent over 2004 levels), without greenhouse gas regulations currently effect (see below), and to 15.6 billion gallons with the regulations in effect. The demand for diesel is expected to grow to 4.9 billion gallons per year by 2025 (a 75 percent increase over 2004 levels), with or without the greenhouse regulations.²¹ Imports of foreign crude oil, which currently account for approximately 40 percent of supply, will increase as in-state and Alaskan supplies diminish. California's energy efficiency programs have been effective in slowing the growth in demand for electricity and natural gas. However, in the transportation sector, fuel economy standards have been allowed to languish under the aegis of the federal government. In addition, the significant

market penetration of light trucks has had a dampening effect on overall fuel economy. However, some initiatives have been implemented to reduce demand for conventional fuels. For example, in 2005, the California Air Resources Board (CARB) adopted regulations limiting idling time for heavy duty trucks to five minutes. In addition, savings in transportation fuel consumption may occur as a result of recent price inflation for gasoline and diesel fuels. There is some indication that drivers will switch to mass transit options as fuel prices escalate. However, alternative transportation is not an option for those who live or work in areas with poor transit service.

Meanwhile, CARB adopted landmark regulations in 2004 limiting greenhouse gas emissions from new vehicles sold in California beginning in the 2009 model year. New vehicles complying with this regulation will consume nearly 30 percent less fuel than vehicles built before 2009. Assuming these regulations are not overturned in the courts, they could result in significant reductions in the demand for petroleum in California.

City of Lodi General Plan

The City General Plan includes a number of goals and policies which indirectly promote efficient energy use and energy conservation. These include:

- Housing Element Goal E: To encourage energy efficiency in all new and existing housing; and related policies: (1) The City shall require the use of energy conservation features in the design of all new residential structures and shall promote incorporation of energy conservation and weatherization features in existing homes. (2) Solar access shall be a consideration in the design of all residential projects. (3) The City shall post and distribute information on currently available weatherization and energy conservation programs.
- Circulation Element Goal A: To provide for a circulation system that accommodates existing and proposed land uses and provides for the efficient movement of people, goods, and services within and through Lodi; and related policies: (1) The City shall time the construction of new development such that the time frame for completion of the needed circulation improvements will not cause the level of service goals to be exceeded. (2) The City shall require dedication, widening, extension, and construction of public streets in accordance with the City's street standards. Major street improvements shall be completed as abutting lands develop or redevelop. In currently developed areas, the City may determine that improvements necessary to meet City standards are either infeasible or undesirable.

- Circulation Element Goal C: To encourage use of transit where feasible.
- Circulation Element Goal G: To encourage reduction in regional vehicle miles traveled; and related policies: (1) The City shall promote ridesharing to reduce peak-hour traffic congestion and help reduce regional miles traveled. (2) The City shall promote employment opportunities within Lodi to reduce commuting to areas outside of Lodi.
- Conservation Element Goal F: To promote and, insofar as possible, improve air quality in Lodi and the region; and related policies: (1) The City shall promote travel by bicycle and foot within Lodi. (2) The City shall promote transit for trips within Lodi and for regional trips. (3) The City shall promote employment opportunities within Lodi to reduce commuting to areas outside Lodi.

**4.4.2
Thresholds of
Significance**

Significant impacts relative to air quality are evaluated in this section based on CEQA Guidelines, as described in the Project Initial Study, and as assessed through the following questions:

- Would the Project conflict with or obstruct implementation of the applicable air quality plan?
- Would the Project violate any air quality standard or contribute substantially to an existing or projected air quality violation?
- Would the Project expose sensitive receptors to substantial air pollutant concentrations?
- 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?
- Would the Project create objectionable odors affecting a substantial number of people?

**4.4.3
Potential Impacts**

The Project consists of a Redevelopment Plan, the goal of which is to eliminate blight within the Project Area boundaries.

**Conflicts with Air
Quality Plan**

Within the Project Area, implementation would provide for needed infrastructure improvements that would generally improve the quality of life and improve transportation facilities within the area. Improvements to transportation facilities typically result in enhanced traffic flow thereby reducing emissions associated vehicle overcrowding that results reduced speeds and increased emissions.

The Project would facilitate and perhaps accelerate industrial, commercial and residential development consistent with the City General Plan. The planned mix of residential and non-residential uses could result in air quality benefits by reducing both the number of trips as well as the average trip length as people find it unnecessary to drive to outlying areas for goods and services.

The Project would not involve growth-inducing impacts or cause an exceedance of established population or growth projections. The Project is not expected to conflict with any federal, state or regional air quality plan.

Violation of Air Quality Standards

Construction

Construction operations are responsible for the emissions of CO, NO_x, ROG, SO_x, PM₁₀, and PM_{2.5}. The amount of emissions generated is related to the level and type of construction activity. Construction-related emissions are short-term in nature and can generally be mitigated to a level of insignificance.

The SJVAPCD does not set daily construction emissions limitations, but notes that if those measures included in Regulation VIII are not followed, project construction should be regarded as significant. The SJVAPCD Guidelines provide additional measures, required for large-scale projects, to reduce these potential impacts to less than a level of significant. Additionally, the Guidelines note that large-scale construction has the potential to exceed yearly limitations of 10 tons per year for either NO_x or ROG.

NO_x, ROG, PM₁₀, and PM_{2.5} are contained in the exhaust fumes emitted from mobile construction equipment, including utility engines and vehicles involved directly in construction, and those that are used to transport equipment and materials to and from the site. The amount of exhaust emissions generated would depend on the time frame of the proposed development and the construction equipment that is required.

As future development occurs in the Project Area, each proposal will be subject to the established SJVAPCD Rules and Regulations Manual, which establishes specific guidance for air quality monitoring, mitigation and compliance. To ensure consistency between SJVAPCD policies and redevelopment activities within the Project Area, the requirement for subsequent air quality assessment per SJVAPCD criteria is added as Mitigation Measure AQ-1 to this EIR.

Redevelopment activities are expected to stimulate the elimination of blight and the pace of new energy-efficient development. Consequently, with inclusion of Mitigation Measure AQ-1, anticipated

impacts relative to construction air quality impacts are expected to be less than significant.

Long-Term Operational Air Quality Impacts

Long-term air quality impacts are those associated with the emissions produced from project-generated vehicle trips as well as from stationary sources related to the use of natural gas for heating, the use of hearths, landscape maintenance equipment, the use of consumer aerosol products, and on-going structural maintenance (i.e., re-painting).

As future development occurs in the Project Area, each proposal will be subject to the established SJVAPCD Rules and Regulations Manual, which establishes specific guidance for air quality monitoring, mitigation and compliance. This requirement for subsequent air quality assessment per SJVAPCD criteria is added as Mitigation Measure AQ-1 to this EIR. With inclusion of Mitigation Measure AQ-1, anticipated impacts to long term operational air quality impacts are expected to be less than significant.

Exposure of Sensitive Receptors to Substantial Pollutant Concentrations Standards

Changes in land use promulgated through the City General Plan project an increase, although slight, in industrial use relative to residential uses. To ensure that future development projects in the Project Area consider potential impacts to sensitive receptors, the requirement for subsequent air quality assessment per SJVAPCD criteria is added as Mitigation Measure AQ-1 to this EIR. With inclusion of Mitigation Measure AQ-1, anticipated impacts to sensitive receptors are expected to be less than significant.

Global Warming / Greenhouse Gas Emissions

At this time, greenhouse gases (primarily CO₂) are not regulated as a criteria pollutant and there are no significance criteria for these emissions. Further, direct impacts on climate change from urban development are difficult to determine because urban development does not constitute a separate source of greenhouse gas (GHG) emissions that are distinct from vehicle or energy associated emissions. In addition, it is difficult to measure or predict the magnitude of GHG emissions that might be associated with a particular project due to the indirect relationship between urban development and GHG production. The mechanisms of land-atmosphere interactions are not well-understood or represented in climate models. As a result, project specific contributions to global warming cannot be discerned with a high degree of certainty.

Therefore, it is appropriate to evaluate potential project impacts based on project consistency with regulatory standards, requirements, strategies, and policies designed to reduce GHG emissions.

Compliance with SJVAPCD Rules and Regulations as specified in Mitigation Measure AQ-1, is expected to reduce impacts relative to GHG to less than significant levels. In addition, to ensure that future development and redevelopment activities in the Project Area are conducted according to current available “green” technologies, Mitigation Measure AQ-2 is added to the Project. This measure requires compliance with future City adopted “green design” or “sustainable development” ordinances.

Energy Redevelopment is in many respects the land use equivalent of recycling. It provides a blighted urban area with funds to improve infrastructure and bring deteriorating structures up to current codes. By promoting redevelopment of the Project Area, the Project is expected to encourage new replacement development that will comply with current energy regulation and energy savings technology. The Project will be consistent with the General Plan, including goals and policies that support energy saving activities.

Because the Project Area is already urbanized, future redevelopment of the Project Area is not expected to generate more energy consumption than currently exists in the area. Electricity and natural gas consumption may in fact be less as than currently occurs as new development complies with current code, and energy efficient design and technologies. Because the ultimate amount of development in the Project Area would be no greater than that proposed by the General Plan, amounts of transportation fuel consumption would no greater than already planned by City and regional plans. Consequently, the Project use of would not result in a significant impact to energy resources.

Objectionable Odors Future industrial uses that are expected to develop in the Project Area could emit fumes that create objectionable odors. Other future sources of odors include construction activities and vehicular emissions. Future development will be required to comply with Mitigation Measure AQ-1 as well as the California Building Code and SJVAPCD regulations specific to odor control. Therefore, impacts related to creation of objectionable odors affecting substantial numbers of people are expected to be less than significant.

4.4.4 Cumulative Impacts – Air Quality In accordance with SJVAPCD methodology, any project that does not exceed or can be mitigated to less than the daily threshold values does not add significantly to a cumulative impact. Measures AQ-1 and AQ-2, are expected to reduce potential air quality impacts associated with adoption and implementation of the Redevelopment Plan to less than significant levels. As such, the Project contribution to cumulative air quality impacts is considered less than significant.

4.4.5
Conclusions: Potential
Air Quality Impacts

Project air quality impacts related to compliance with applicable air quality plans, construction activities, operational activities, global warming, exposure of sensitive receptors and odors are expected to be less than significant with inclusion of Mitigation Measures AQ-1 and AQ-2.

4.4.6
Mitigation Measures

AQ-1: Future development proposals in the Project Area shall be subject to compliance with the established SJVAPCD Rules and Regulations Manual, which may include air quality impact studies and subsequent CEQA analysis. The City Community Development Director shall ensure compliance.

AQ-2: Future development proposals in the Project Area shall be subject to compliance with a City adopted “green design” or “sustainable development” ordinance should such ordinance be adopted prior to project development. If such ordinance is not adopted prior to project development, each development shall be encouraged to incorporate any or all of current available energy-conservation features and “green” technologies into the project design.

4.4.7
Significance after
Mitigation

Less than significant.

4.5
PUBLIC SERVICES

This section addresses potential impacts regarding public services in the Project Area, specifically related to: fire protection, police protection, schools, and parks. Other public service facilities are not expected to be affected by the Project. Existing conditions, potential impacts and mitigation measures for each of these services and utilizes are discussed. Primary data for this section are drawn from the City General Plan and City website (<http://www.Lodi.org>).

4.5.1
Existing Conditions

Police Protection

Law enforcement services within the City limits are provided by the Lodi Police Department, which consists of two divisions: Support Services and Operations. Support Services includes: the Dispatch, Jail, and Records Unit; the Special Investigations Unit; and the General Detectives Unit. The Police Department is currently staffed with 78 sworn officers and 39 civilian staff¹⁵. The Lodi Police

¹⁵ Lodi Annexation Environmental Impact Report, prepared by LSA, April 2006.

Department operates one central police station located at 215 West Elm Street, west of the Project Area.

The Operations Division is divided into five police districts that are in charge of patrolling various areas of the City. Officers and supervisors are assigned to a specific district in order to stay abreast of specific problems that are unique to each district.

The Police Department patrols the Project Area 24 hours a day and seven days a week. In accordance with the Lodi General Plan, the Lodi Police Department has the goal to respond to all emergency calls within three minutes and all non-emergency calls within 40 minutes.

Fire Protection

The Lodi Fire Department provides fire protection, basic emergency medical services, and related safety services for the City of Lodi. The Lodi Fire Department has a current staffing level of approximately 62 personnel. Staff includes a fire chief, two division chiefs, four battalion chiefs, a fire marshal, support personnel, an inspector, and fire fighters/engineers (including captains). The Fire Department operates 24 hours a day seven days a week, with three rotating shifts and a minimum of 16 firefighters and officers and one shift commander on duty at all times¹⁶.

Average response time for emergency fire service calls is 4:05 minutes. The Lodi Fire Department has the goal to respond to all emergency calls within four minutes of receiving the call and within three minutes of travel time. The City of Lodi Fire Department has mutual aid agreements with the Delta Fire Protection District and the Woodbridge Fire Protection District.

The Fire Administration building is located at 25 East Pine Street, within the Project Area. The building houses the Fire Chief, the Fire Division Chief of Resources Administration, the Fire Division Chief of Administrative Services, the Battalion Chief of Physical Resources, the Department Secretary, and fire prevention services, including the Fire Marshal, the Fire Inspector and an Administrative Clerk.

Fire Station 1 is located at 210 West Elm Street. It is staffed with a captain, fire engineer and two fire fighters; and equipped with a 75-foot ladder truck and a brush truck. Fire Station 2 is located at 705 East Lodi Avenue and is staffed with a captain, a fire engineer, and a fire fighter. Station 2 is equipped with a Fire Engine, Hazardous

¹⁶ *Lodi Annexation Environmental Impact Report*, prepared by LSA, April 2006.

Materials Unit and a reserve Fire Engine. Both Stations 2 and 3 are in the Project Area

Fire Station 3 is located at 2141 South Ham Lane and is single engine company staffed with a captain, a fire engineer, and a fire fighter. This station is located south of the Project Area. Fire Station 4 is located at 180 North Lower Sacramento Road. Station 4 is staffed with a captain, a fire engineer, and a fire fighter; and is equipped with one Fire Engine. Station 4 is located west of the Project Area.

Schools

Lodi Unified School District (LUSD) is the primary district serving the City and the Project Area. LUSD serves a 350 square mile area that includes Lodi, North Stockton and the unincorporated communities of Acampo, Clements, Lockeford, Victor and Woodbridge. It has an enrollment of 26,700 students, and 37 school sites, including: 28 elementary, five middle schools, three high schools, and two continuation high schools. LUSD also provides two elementary community day schools, and one middle community day school, a Middle College High School, an adult school, a career center, children's center, a developmental center for the disabled, and several pre-school programs.

Parks

The City of Lodi Parks & Recreation Department provides park and recreational services to the City and Project Area. There are 27 parks, natural open space areas, and sports fields. Several parks are located within storm drainage detention basins that contain water during the winter rainy season.

Within the Project Area, there are six parks, some of which serve jointly as detention basins. These parks comprise over 91 acres, about 4% of the land within the Project Area.

The City of Lodi General Plan establishes a standard of 8 acres of neighborhood and community parkland per 1,000 population. Its current park ratio is about 5.37 acres per 1,000 population, below the desired standard¹⁷.

¹⁷ *Lodi Annexation Environmental Impact Report*, prepared by LSA, April 2006.

**4.5.2
Thresholds of
Significance**

Significant impacts relative to public services are evaluated in this section based on CEQA Guidelines, as described in the Project Initial Study, and as assessed through the following question:

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

**4.5.3
Potential Impacts**

Police Protection Services

The Redevelopment Plan is expected to alleviate blight in the Project Area. New and rehabilitated developments will incorporate better building design, lighting, security hardware, location, visibility and landscape treatments than currently exists without redevelopment. These improvements, in turn, will enhance public safety and potentially result in fewer calls for police protection services than would result without redevelopment. In addition, all new developments within the Project Area will be responsible for paying the conventional City impact fees, which may be used toward police facility and staffing requirements.

On the other hand, the proposed Redevelopment Plan is expected to facilitate and perhaps accelerate the development and redevelopment of underutilized properties in the Project Area. This transition of vacant and underutilized properties to new, perhaps more intensive, development could create an increased demand for police services not currently anticipated by current Police Department facility, equipment and staffing levels.

While the Redevelopment Plan is expected to generate redevelopment funding that will provide an opportunity to participate in the capital cost of new facilities, including new police facilities, it is not known if these funds or the required City impact fees will be adequate to off-set the potential increased operational demands for police services.

To ensure all future development in the Project Area provides for its fair share of police services, Mitigation Measure PS-1 is recommended for inclusion to the Project. PS-1 requires that development proponents of projects requiring a discretionary review before the City be responsible for contributing their fair share for police services. With inclusion of PS-1, potential adverse impacts to police services, either directly, indirectly or cumulatively, are expected to be less than significant.

Fire Protection

Implementation of the Redevelopment Plan will stimulate new development and rehabilitation of older structures. New and rehabilitated construction projects will be required to comply with recent fire code provisions, including installation of smoke alarms, fire sprinklers and/or use of the latest approved fire retardant/resistant materials. Construction activities that include these improvements will help to reduce both the current and further demand on fire protection services for the Project Area.

On the other hand, the proposed Redevelopment Plan is expected to facilitate and perhaps accelerate the development and redevelopment of underutilized properties in the Project Area. This transition of vacant and underutilized properties to new, perhaps more intensive, development could create an increased demand for fire protection services not currently anticipated by the Department.

While the Redevelopment Plan is expected to generate redevelopment funding that will provide an opportunity to participate in the capital cost of new facilities, including new fire protection facilities, it is not known if these funds inclusive of potential developer impact fees, will be adequate to off-set the potential increased operational demands for fire protection services.

To ensure all future development in the Project Area provides for its fair share of fire protection services, Mitigation Measure PS-1 is recommended for inclusion to the Project. PS-1 requires that development proponents of projects requiring a discretionary review before the City be responsible for contributing their fair share toward fire protection services. With inclusion of PS-1, potential adverse impacts to fire protection services, either directly, indirectly or cumulatively, are expected to be less than significant.

Schools

The Redevelopment Plan is consistent with the General Plan and will not increase the amount or density of development already planned by the City. Similarly, implementation of the Redevelopment Plan will not increase the need for school services over that already anticipated in the General Plan.

Pursuant to Section 33607.5 of the *CRL*, LUSD, the school district serving the Project Area, will receive annual mandatory tax increment sharing payments from the Redevelopment Plan. The monies may be used to provide facilities and ongoing education programs, and are expected to benefit the provision of school services in the Project Area. In addition, the school districts currently collect development impact fees to the extent allowable under State law.

The Project would not substantially increase the need for new or improved school facilities. No potential adverse impacts to schools are expected to result from the Project, either directly, indirectly or cumulatively.

Parks

The Redevelopment Plan is consistent with the General Plan and will not increase the amount or density of development already planned by the City. Similarly, implementation of the Redevelopment Plan will not increase the need for park services over that already anticipated in the General Plan.

Pursuant to the Quimby Act, the City collects fees from new development to contribute to park improvements. These fees are collected consistent with state law and local ordinance.

The Project would not substantially increase the need for new or improved park facilities. No potential adverse impacts to parks are expected to result from the Project, either directly, indirectly or cumulatively.

4.5.4 Cumulative Impacts – Public Services

Implementation of the Project will not significantly increase regional demand for public services. Therefore, no cumulative impacts relative to public services are expected to occur as a result of the Project.

4.5.5 Conclusions Regarding Impacts to Public Services

Increases in development and public service demands will be consistent with the City General Plan. Further, the availability of redevelopment funds to assist public services is expected to offset potential acceleration of development that could occur as a result of Redevelopment Plan implementation. Payment of applicable school and park fees are expected to mitigate future demand for these services.

However, the transition of vacant and underutilized properties to new, perhaps more intensive, development could create an increased demand for police and fire protection services not currently anticipated by current departmental facility, equipment and staffing levels. PS-1 is expected to mitigate these potential impacts to less than significant levels.

4.5.6 Mitigation Measures

PS-1. Prior to issuance of building permits, all development proponents of projects requiring a discretionary review before the City shall be responsible for contributing their fair share for required police and fire protection services. The fair share contribution shall be determined through negotiations with the City and development

proponent. The City Community Development Director shall ensure compliance.

4.5.7
Significance After
Mitigation

Less than significant.

4.6
UTILITIES

This section addresses potential impacts regarding utilities in the Project Area, specifically related to: water, wastewater, water quality, storm drainage and solid waste. Existing conditions, potential impacts and mitigation measures for each of these services and utilizes are discussed. Primary data for this section are drawn from the City of Lodi General Plan and City website (<http://www.Lodi.org>).

4.6.1
Existing Conditions

Water

The City of Lodi Water Services Division provides potable water to residential, commercial and industrial customers; and, provides water for adequate pressures to fire hydrants, private fire suppression systems and private on-site hydrants.

Water supply for the City, inclusive of the Project Area, is primarily from the Eastern San Joaquin Groundwater Basin, which lies beneath the City and is part of the Central Valley Groundwater Basin. With a combined capacity of 50.7 million gallons per day (mgd), the basin provides groundwater to 26 wells located throughout the City¹⁸. The wells operate automatically so that when water use increases, more wells come on line.

According to the City Urban Water Management Plan, the City's sustainable groundwater supply of approximately 15,000 acre-feet per year. Average annual water use in the City of Lodi in 2004 was 17,011 acre-feet (15.19 million gallons per day). To augment its water supply, the City has contracted with the Woodbridge Irrigation District (WID) to provide an additional 6,000 acre-feet per year of untreated surface water for 40 years.

The City's water distribution system consists of an elevated storage tank, one ground level storage facility and pumping station, and the piping system. A one million gallon ground storage tank, located east of Highway 99 on Thurman Street, stores groundwater from nearby

¹⁸ *City of Lodi 2005 Urban Water Management Plan Final Report*, prepared by RMC Water and Environment, March 2005.

wells to meet peak hour demands and fire flows. A 100,000-gallon elevated storage tank is located on North Main Street.

Water Quality

The Clean Water Act (CWA), 33 U.S.C. § 1251, et seq., is the primary federal law in the United States governing water pollution. The CWA prohibits potentially harmful spills of oil and certain hazardous substances. Its intent is to end all discharges of pollutants and to restore, maintain, and preserve the integrity of the nation's waters. CWA aims to create waters that would be safe enough for activities such as fishing and swimming.

To achieve these stated goals, the CWA regulates both the direct and indirect discharge of pollutants into the nation's waters. It requires individuals and corporations to obtain permits before releasing any pollutants into "navigable waters" (including Lodi Lake and Mokelumne River). The system for granting and regulating discharge permits through the CWA is called the National Pollutant Discharge Elimination System (NPDES).

In the State of California, the Porter-Cologne Water Quality Control Act (Porter-Cologne Act) of 1969 is the statutory authority for the protection of water quality. Under the act, the Regional Water Quality Control Board (RWQCB) is responsible for administering the NPDES permitting program in its respective region, and for developing NPDES permitting requirements. RWQCB responsibilities are administered geographically, with the California Regional Water Quality Control Board Central Valley Region covering the City of Lodi.

To meet required water quality standards, the City of Lodi Water Services Division periodically chlorinates its tank-contained water supply as a proactive step to keep the water system in compliance with water quality standards. In 2006, Lodi's drinking water achieved or exceeded all federal and state water quality standards.

Wastewater

The City of Lodi Public Works Department oversees wastewater collection and treatment services to the community, inclusive of the Project Area. The cornerstone of the City's program, the White Slough Water Pollution Control Facility (White Slough) was originally constructed in 1966. This facility replaced one of the oldest secondary treatment facilities in the Western United States. White Slough provides the City of Lodi with a means to achieve water quality standards required for the protection of the environmentally sensitive Sacramento-San Joaquin Delta.

In 1992, the White Slough facility was expanded to a design capacity of 8.5 million gallons per day (mgd). It currently operates at approximately 75 percent of the design capacity. The remaining capacity of the facility is anticipated to accommodate General Plan build-out of the City of Lodi.

Through the years, White Slough has been expanded and improved to meet the increasingly stringent environmental protection standards in an economically sound manner. The most recent project, completed in 2005, has modified the treatment process to include tertiary filtration and ultraviolet light disinfection, which replaces chlorine gas. Ultraviolet disinfection is safer for the environment and City staff working at the facility.

Wastewater Recycling

Adjacent to the White Slough facility, the City owns in excess of 1,000 acres of land and leases over 900 acres to local farmers for the cultivation and harvesting of feed and fodder crops not intended for human consumption. The facility has the flexibility to irrigate with domestic flow and cannery process water. In recent years, the City has also supplied recycled water to produce steam for a 49-megawatt power generator, and to replenish mosquito fish-rearing ponds. If a process upset should occur, the domestic flow can be stored in holding ponds and further treated before discharging water to the Delta.

The City utilizes a process called anaerobic digestion to convert the solids removed from the wastewater into a useful byproduct known as biosolids. City staff tests the quality of the wastewater with a fully equipped, state-certified laboratory, which is involved in every phase of wastewater treatment. This biosolid material produced through this process meets federal regulations for safe use.

Storm Drainage

The City is responsible for the maintenance, repair and planning of storm drainage systems within the City. The municipal storm drainage system consists of an integrated network of trunk lines, retention basins, and pump stations. Surface infrastructure such as gutters, alley, and storm ditches provide for collection of storm water into the system.

Ultimate discharge of collected storm water within Lodi is into the Mokelumne River or the Woodbridge Irrigation District (WID) Canal.

In compliance with state and federal requirements, the City has developed a Stormwater Management Program committed to protecting its rivers and the Delta by involving and educating its residents in stormwater pollution prevention, regulating stormwater

runoff from construction sites, investigating non-stormwater discharges and reducing non-stormwater run-off from municipal operations.

Solid Waste

Central Valley Waste Services, a subsidiary of Waste Management, Inc., provides solid waste collection services to the City. Central Valley Waste collects solid waste from residential, commercial and industrial properties in the City and transports the waste to a Transfer Station and Materials Recovery Facility (MRF). The waste is then transferred to large haul vehicles that transport the waste to the North County Landfill.

The North County Landfill is a Class III facility that is owned and operated by San Joaquin County Public Works Department. A Class III landfill is one which receives agricultural, construction/demolition, mixed municipal, industrial, dead animals and tires.

The North County Landfill is permitted to accept 825 tons of solid waste per day. On average, the landfill currently receives an average of 402 tons of waste per day. The current capacity of the landfill is expected to handle County demand through 2035.

Solid Waste Recycling

The California Public Resources Code section 41730 et seq, requires every City and County in California to adopt a NonDisposal Facility Element for existing or proposed nondisposal facilities needed to implement their Source Reduction and Recycling Elements (SRRE). In San Joaquin County, a disposal facility is a landfill. A nondisposal facility is any solid waste processing facility required to obtain a solid waste facility permit.

Serving the City, are two material processing nondisposal facilities¹⁹. One is the Materials Recovery Facility (MRF) owned by California Waste, located at 1333 E. Turner Road. This MRF processes the majority of residential, commercial and industrial waste generated in Lodi. The second is a MRF located close to the entrance of the North County Recycling Center & Sanitary Landfill on east Harney Lane. This facility processes any waste generated in the City which does not pass through the California Waste MRF (e.g. self-haul waste or industrial waste collected by Stockton Scavenger Assn.).

¹⁹ Resolution adopting the City of Lodi NonDisposal Facility Element, May 15, 1996.

**4.6.2
Threshold for
Determining
Significance**

Significant impacts relative to utilities are evaluated in this section based on CEQA Guidelines, as described in the Project Initial Study, and as assessed through the following questions:

- Utilities:
Would the Project:
 - (a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?
 - (b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
 - (c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
 - (d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?
 - (e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?
 - (f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?
 - (g) Comply with federal, state, and local statutes and regulations related to solid waste?

**4.6.3
Potential Impacts**

Water and Wastewater

The Redevelopment Plan is consistent with the City General Plan and is not expected to increase the amount or density of development already planned by the City. The availability of redevelopment funds to assist public services is expected to offset, at least in part, potential acceleration of development that could occur as a result of Redevelopment Plan implementation.

On the other hand, the proposed Redevelopment Plan is expected to facilitate and perhaps accelerate the development and redevelopment of underutilized properties in the Project Area. This transition of vacant and underutilized properties to new, perhaps more intensive, development could create an increased demand for water and wastewater facilities.

However, the Project will provide a new source of funding for public utilities, inclusive of water and wastewater facilities, that in the past were paid for by exclusively or almost exclusively through the General Fund. With property values and sales activity relatively stagnant in

the Project Area, General Fund revenues available for public facilities are currently limited. Tax Increment funds to be generated by the Project will be available for future water and wastewater facilities, allowing City General Funds to be committed to ongoing operations, not debt service. In addition, the Redevelopment Plan will stimulate the tax base and is expected to produce more Transient Occupancy and Sales Tax.

Consequently, the Project is not expected to exceed wastewater treatment requirements or capacities, or water supplies. It is not expected to require or result in the construction of new or expansion of water or wastewater treatment facilities.

Water Quality

Each new development within the City, inclusive of the Project Area, is required to retain and filter water run-off on-site in compliance with water quality requirements of the California Regional Water Quality Control Board Central Valley Region. The Redevelopment Plan will provide a new source of funding to be used to assist new development install required water quality facilities. By encouraging new development and redevelopment, the Project is expected to facilitate compliance with regional water quality requirements. Therefore, no potentially significant adverse impacts are expected relative to Project direct, indirect and cumulative water quality impacts.

Storm Drainage

The Redevelopment Plan is consistent with the General Plan and will not increase the amount or density of development already planned by the City. Similarly, implementation of the Redevelopment Plan will not increase the need for storm drainage facilities over that already anticipated in the General Plan.

Implementation of the Redevelopment Plan will provide a new source of funding to be used for storm drain improvements. The Project is not expected to require or result in the construction of new or expansion of existing storm water drainage facilities. Therefore, potential direct, indirect and cumulative impacts to storm drainage facilities are expected to be less than significant.

Solid Waste

The Redevelopment Plan is consistent with the General Plan and will not increase the amount or density of development already planned by the City. All future development in the Project Area will be required to comply with Central Valley Waste Services and City requirements regarding trash pick-up and collection. Similarly, all future

development will be required to comply with the City SRRE. Consistency with the General Plan and compliance with applicable state, regional and local solid waste requirements are expected to ensure adequate solid waste services. Therefore, potential direct, indirect and cumulative impacts to solid waste capacity and facilities are expected to be less than significant.

**4.6.4
Cumulative Impacts -
Utilities**

Because implementation of the Project will not significantly increase demand for utilities over that already anticipated in the General Plan, it is not expected to impact the regional demand for utilities, which is based on local general plan projections inclusive of the City General Plan. Therefore, the Project will not contribute to significant cumulative impacts relative to utilities.

**4.6.5
Conclusions Regarding
Impacts to Utilities**

Increases in development and utility demands will be consistent with the General Plan. Further, the availability of redevelopment funds to assist utilities (for example, new or upgraded water, wastewater and storm drainage facilities) is expected to offset potential acceleration of development that could occur as a result of Redevelopment Plan implementation.

The proposed Project is not expected to substantially increase the need for new or improved water quality or solid waste facilities. Therefore the Redevelopment Plan will not result in significant impacts to utilities.

**4.6.6
Mitigation Measures**

None required.

**4.6.7
Significance After
Mitigation**

None

**4.7
CULTURAL
RESOURCES**

This section addresses potential impacts regarding cultural resources in the Project Area, specifically related to potential historical resources. Existing conditions, potential impacts and mitigation measures for historical resources are discussed. Primary data for this section are drawn from the City General Plan and City website (<http://www.Lodi.org>).

**4.7.1
Existing Conditions**

The City, formerly the Town of Mokelumne, was incorporated in 1906. A number of its original buildings still remain. Approximately 65 percent of the buildings in the 22-block Downtown area have historical significance²⁰. Most of these buildings are located along what were the historic main streets: Sacramento and School Streets (adjacent to the Project Area). Other historical buildings located throughout Downtown include Lodi Arch, Hotel Lodi, the old opera house, City Hall, and the Carnegie Library. The Lodi Arch was constructed in 1907, spanning Pine Street at Sacramento Street, as part of a large carnival advertising Tokay grapes. These historical resources are located in the Project Area.

A goal of the City Land Use Element is preserve and enhance Lodi's historical heritage. Associated policies of this goal include:

1. The City shall develop a historic preservation ordinance.
2. The City shall coordinate with the State Office of Historic Preservation in developing the historic preservation ordinance.
3. The City shall work with property owners in seeking registration of historical structures as State Historic Landmarks or listing on the National Register of Historic Places.
4. The City shall consult with the California Archeological Inventory, Central California Information Center, at Stanislaus State University, on any project that could have an impact on cultural resources and implement the center's recommended mitigation measures.

Although the City continues to work to preserve and enhance its historical resources, a local historical resource element has not yet been adopted.

**4.7.2
Thresholds of
Significance**

Significant impacts relative to cultural resources are evaluated in this section based on CEQA Guidelines, as described in the Project Initial Study, and as assessed through the following question:

- Would the Project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

**4.7.3
Potential Impacts**

Development in the Project Area must be consistent with the City General Plan, including Land Use Element Goal 3 and policies related to preservation of Lodi's historical heritage.

²⁰ City of Lodi Background Report – General Plan Update, January 15, 1988.

Implementation of the Redevelopment Plan could accelerate growth and place new development pressure on existing historic resources. To ensure that potential historical resources in the Project Area are properly identified and protected, Mitigation Measure CUL-1 is recommended for inclusion to the Project. CUL-1 requires a historical resource survey by a qualified consultant prior to any exterior demolition, structural repair or construction on buildings over 45 years of age and considered based on available City records to be potentially historically significant.

**4.7.4
Cumulative Impacts –
Cultural Resources**

The potential for the Project to impact historical resources is expected to be mitigated to less than significant levels through Mitigation Measure CUL-1. Consequently, the Project is not expected to contribute to significant adverse cumulative impacts relative cultural resources.

**4.7.5
Conclusions -
Impacts to Cultural
Resources**

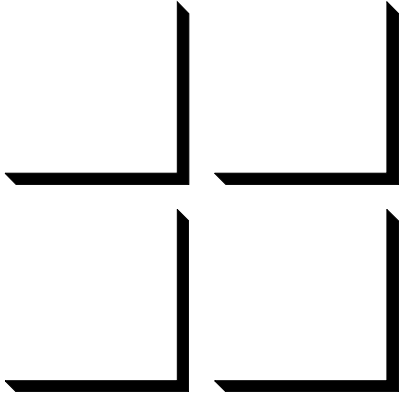
There is some potential for future development in the Project Area to impact historical resources. CUL-1 is recommended for inclusion to reduce these impacts to less than significant levels.

**4.7.6
Mitigation Measures**

CUL-1: Prior to issuance of any permits related to the exterior demolition, structural repair or construction on structures over 45 years of age and which are considered based on available City records to be potentially historically significant, a historical resource survey shall be conducted by a qualified consultant. Should the structure be found to be potentially significant, mitigation measures recommended by the historical resources consultant shall be considered for inclusion in the project. The City Community Development Director shall ensure compliance.

**4.7.7
Significance After
Mitigation**

Less than significant.



5.0 LONG-TERM IMPACTS SUMMARY

This chapter summarizes long-term implications of the Project should it be implemented. Specifically, this chapter discusses expected Project growth-inducing impacts, cumulative impacts, significant environmental impacts that cannot be avoided, and the significant irreversible environmental changes that would be caused by the proposed Project. Mandatory findings of significance are also discussed.

5.1 GROWTH INDUCING IMPACTS

Pursuant to Section 15126.2 (d) of the CEQA Guidelines, growth-inducing impacts are the ways in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are direct and indirect growth-inducing impacts.

Types of Growth-Inducing Impacts

Direct growth-inducing impacts occur when a project would remove obstacles to population growth. (A major expansion of a wastewater treatment plant or a new road into an undeveloped area might, for example, increase economic or population growth). These types of growth-inducing projects may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects.

Indirect growth-inducing impacts occur when a project encourages or facilitates other activities that could cause significant environmental effects. (A new residential subdivision in a previously undeveloped area might, for example, generate the need for new commercial development and subsequently new roads.)

Project Growth-Inducing Impacts

Redevelopment plans are required by State law to be consistent with the community's general plan. The proposed Redevelopment Plan would specifically adopt the City General Plan by reference. Consequently, the Project would be consistent with the City General Plan.

The Project does not propose new roads or infrastructure that could substantially induce population growth.

However, the proposed Redevelopment Plan component of the Project provides a new funding source to support planned road and infrastructure improvements. Many roadway and infrastructure improvement projects that have been planned by the City General Plan do not have adequate available funding sources. Consequently, without the assistance of redevelopment funds, these improvements and the economic and population growth they would generate are not expected to occur. With implementation of the Project, the Project Area would achieve projected General Plan development over time.

In this manner, the Project would remove obstacles to economic and population growth, and could result in direct growth inducing impacts. However, the City has already planned for this growth through its General Plan process. Consequently, the growth-inducing aspects of the Project would not tax existing community service facilities, and would not require construction of new facilities that could cause significant environmental effects. Similarly, the growth-inducing aspects of the Project are not expected to encourage or facilitate other activities that could cause significant environmental effects. No significant adverse growth inducing impacts, either direct or indirect, are expected to occur as a result of Project implementation.

CUMULATIVE IMPACTS SUMMARY

5.2 Section 15130 of the CEQA Guidelines requires that EIRs consider the cumulative impacts of a project. A cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. If a project does not result in a project-level impact of any dimension for a specific environmental issue, the project would not contribute to a significant, cumulative impact. However, it is possible for a less-than-significant project-level impact to contribute to a significant cumulative impact.

In identifying projects that may contribute to cumulative impacts, the CEQA Guidelines allow the use of a list of past, present, and reasonably anticipated future projects, producing related or cumulative impacts, including those that are outside of the control of

the lead agency. Alternatively, the CEQA Guidelines also allow the use of a summary of projections contained in an adopted General Plan or related planning document, which is designed to evaluate regional or area-wide conditions. For the purposes of this EIR, the growth projections assumed for the City General Plan are used for the cumulative analysis.

As discussed in Section 4.0, the Project is expected to result in no significant adverse impacts relative to land use population and housing, public services and utilities. Because there would not be a project-level impact of any dimension relative to land use, population and housing, public services and utilities, the Project would not contribute to a significant, cumulative impact relative to these topics.

As discussed in Section 4.0, the Project is expected to result in less-than-significant level impacts relative to traffic, air quality, utilities, and cultural resources. In the case of traffic, future increases in traffic volumes will result primarily from cumulative development throughout the Project Area, which are a function of the General Plan's land use and circulation policies, rather than the Project.

In the case, of air quality and, and cultural resources mitigation measures are added to the Project, and findings are made as follows:

- Air Quality: Inclusion of Mitigation Measures AQ-1 and AQ-2 are expected to reduce Project air quality impacts to less than significant levels. Cumulative Project impacts relative to air quality are expected to be less than significant.
- Cultural Resources: Inclusion of Mitigation Measure CUL-1 is expected to reduce Project impacts to historical resources to less than significant levels. No cumulative Project impacts relative cultural resources are expected.

With inclusion of these mitigation measures, project-level impacts would be reduced to less than significant levels, and consequently would not contribute to significant unavoidable adverse regional or cumulative impacts.

**5.3
SIGNIFICANT
ENVIRONMENTAL
IMPACTS THAT
CANNOT BE
AVOIDED**

Significant environmental impacts that cannot be avoided include any significant impacts, including those that can be mitigated but not reduced to a level of insignificance. Section 4.0, above, evaluates impacts relative to land use, population and housing, traffic, air quality, public services, utilities and cultural resources. Of these environmental topics, the Project is not expected to adversely impact land use or population and housing. In regard to air quality, utilities and historical resources, mitigation measures are applied that are

expected to reduce impacts related to less than significant. No significant unavoidable adverse impacts are expected to occur as a result of the Redevelopment Plan adoption or implementation.

**5.4
MANDATORY
FINDINGS OF
SIGNIFICANCE**

Regarding “Mandatory Findings of Significance”, as defined in the Project Initial Study (Reference Appendix A), with the inclusion of recommended mitigation measures, the Project is not expected to degrade the quality of the environment, including historical resources. The Project is not expected to adversely affect human beings, either directly or indirectly, specifically in regard to existing contaminants (hazards) that may be present within the Project site.

The Project is not expected to contribute to impacts that are individually limited but potentially cumulatively considerable. Consequently, no additional Project impacts are expected relative to mandatory findings of significance, and no additional mitigation measures are required.

**5.5
SIGNIFICANT
IRREVERSIBLE
ENVIRONMENTAL
CHANGES**

Section 15126.2(c) of the CEQA Guidelines requires a discussion of the extent to which a proposed project will commit nonrenewable resources to uses, which future generations will probably be unable to reverse. A project would generally result in a significant irreversible impact if:

- Primary and secondary impacts would commit future generations to similar uses.
- The project would involve a large commitment of nonrenewable resources.
- The project would involve uses in which irreversible damage could result from any potential environmental accidents associated with the project.

Implementation of the Project would result in a Redevelopment Plan that would provide potential funding for improvements identified by City policies, consistent with the City General Plan. The Project is expected to assist the reuse and improvement of existing urbanized and abandoned areas, alleviating existing conditions of blight.

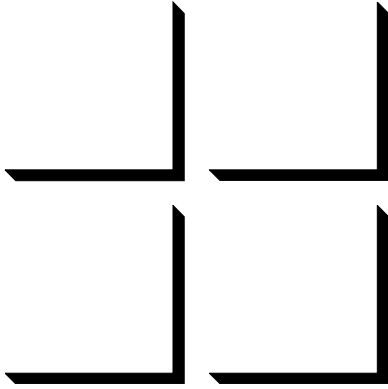
Improvements conducted under the Project would be consistent with the City General Plan. The Project would not commit future generations to uses not already planned. It would facilitate infill development, which would not involve a large commitment of nonrenewable resources. The Project would facilitate General Plan industrial, residential and commercial development; , which would not involve uses in which irreversible damage could result from any

potential environmental accidents associated with the project. The Project would not result in significant irreversible environmental changes.

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6.0 ALTERNATIVES TO THE PROPOSED PROJECT

Pursuant to Section 15126(d) of the California Environmental Quality Act (CEQA) Guidelines, this Chapter examines environmental consequences of a reasonable range of alternatives to the Project that could also feasibly attain the basic objectives of the Project. The Guidelines further require that the discussion focus on alternatives capable of eliminating significant adverse impacts of the project. A "no project" alternative must be discussed as part of the alternatives evaluation. If the environmentally superior alternative is the "no project" alternative, the EIR must also identify an environmentally superior alternative from among the other alternatives.

The term "environmentally superior" refers only to the comparative environmental effects of the proposed project and the alternatives. The project objectives, and whether a particular alternative meets the objectives, must also be considered in the evaluation of alternatives. An alternative may be "environmentally superior" to the proposed project, but the alternative may not meet all of the criteria required to make the project feasible as defined by the lead agency. Therefore, environmental impacts and project objectives must be carefully weighed by decision makers before an informed decision can be made.

The alternatives generally reflect modest modifications specific to the overall Project, eliminating or modifying one of the Project components.

Alternative sites were not considered. In order for an alternative project area to be considered as a redevelopment area, it must first meet the CRL's criteria regarding blight contained in the CRL. The Project Area meets the criteria for blight established by the State of California. Selection of an alternative project area would mean that no benefits associated with redevelopment would be undertaken in the identified Project Area, which has been found to be blighted. Because an alternative location could not meet the basic objectives of the proposed Project, an alternative location is not considered feasible.

Two potential alternatives to the proposed Project are analyzed:

1. No Project Alternative:

As required by CEQA, this alternative would consider the potential environmental consequences if none of the proposed Project components were to occur.

2. Reduced Project Area:

Under this alternative, the size of the Project Area would be reduced. This reduction could involve the removal of the area east or west of Highway 99.

A comparison of these alternatives to the Project is provided in Table 6, below:

TABLE 6			
Lodi Community Improvement Project			
COMPARISON OF PROJECT AND PROJECT ALTERNATIVES			
Issue/Impact	Project	#1 No Project	#2 Reduce Project Area
Project Objectives	Met	Not Met	Partially Met
Land Use & Planning	No Potential Impacts	No Potential Impacts	No Potential Impacts
Population & Housing	No Potential Impacts	No Potential Impacts	No Potential Impacts
Traffic & Circulation	Less Than Significant	Less Than Significant	Less Than Significant
Air Quality	Potential Impacts; Less Than Significant with Mitigation	Potential Impacts; Unmitigated	Potential Impacts; Less Than Significant with Mitigation; Partially Unmitigated
Public Services	No Potential Impacts	No Potential Impacts	No Potential Impacts
Utilities	Potential Impacts; Less Than Significant with Mitigation	Potential Impacts; Unmitigated	Potential Impacts; Less Than Significant with Mitigation; Partially Unmitigated
Cultural Resources	Potential Impacts; Less Than Significant with Mitigation	Potential Impacts; Unmitigated	Potential Impacts; Less Than Significant with Mitigation; Partially Unmitigated
Environmentally Superior (1=high)	1	3	2

**6.1
NO PROJECT
ALTERNATIVE**

This alternative requires that the proposal to adopt the Redevelopment Plan be terminated. If the proposal were terminated, the Project Area would not be formed, the Redevelopment Plan would not occur and various planned infrastructure improvements would not be funded. Without the Project, existing levels of blight would be perpetuated, resulting in continued physical and economic deterioration throughout the Project Area. Blighting conditions cannot be eliminated through the efforts of the private sector acting alone, and in part because sufficient funding to provide roadway and other public improvements would continue to be lacking.

Documentation of existing blighting conditions in the Project Area can be found in the Preliminary Report and in Chapter 3.0 of this EIR. Without redevelopment authority and the proposed financial mechanisms, blighted conditions in the Project Area may not be reversed in whole or in part, or at worst, they may become more widespread and severe. This latter case would contribute to a continuing decline of the area, as well as the affecting physical, social and economic conditions in surrounding areas.

Potential impacts to traffic, air quality, public services, utilities and cultural resources could occur. However, without the Project, mitigation measures to reduce these impacts would not be imposed.

This alternative would not meet the Project objective to eliminate blight, and could allow potential impacts to go unmitigated. Consequently, the No Project Alternative is not considered environmentally superior to the Project. This alternative is rated “3”; the least environmentally superior, in Table 6.

**6.2
REDUCE
REDEVELOPMENT
PROJECT AREA SIZE**

This alternative to the Redevelopment Plan would reduce the size of the territory encompassed by the Project Area. The effect of such a reduction would vary with the specific reduction, but could involve the removal of the area east or west of Highway 99. In general, there would be commensurate reductions in the Agency’s ability to undertake the redevelopment program as contemplated by the Redevelopment Project. These would include reductions in: proposed public improvements and facilities; rehabilitation and relocation assistance to be offered; ability to eliminate conditions of blight; ability to implement the goals of the General Plan; ability to eliminate existing environmental deficiencies and problems occurring in the Project Area.

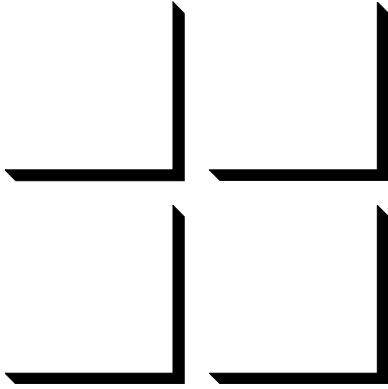
This alternative would allow the blighting conditions in the areas removed from the Redevelopment Plan to continue indefinitely and would reduce the ability of the Agency to implement needed improvements throughout the Project Area. Potential impacts to air quality, and cultural resources could occur in the area removed.

However, without the Project, mitigation measures to reduce these impacts in the area removed would not be imposed.

This Alternative is not considered environmentally superior to the Project. This alternative is rated “2” in Table 6.

6.3
ENVIRONMENTALLY
SUPERIOR
ALTERNATIVE

The proposed Project is considered the environmentally superior alternative because it most directly addresses the Project’s primary goal to alleviate blight in the Project Area.



7.0 INFORMATION SOURCES

7.1 BIBLIOGRAPHY

City of Lodi General Plan (current)

City of Lodi Draft General Plan Draft Environmental Impact Report, prepared by Jones & Stokes, Inc., January 1990.

City of Lodi 2005 Urban Water Management Plan Final Report, prepared by RMC Water and Environment, March 2005.

City of Lodi Background Report – General Plan Update, January 15, 1988

Draft Environmental Impact Report, Lodi Shopping Center, prepared by Pacific Municipal Consultants, August 2004.

Lodi Annexation Environmental Impact Report, prepared by LSA, April 2006.

Reynolds Ranch Project Final Environmental Impact Report, prepared by WILLDAN, August 2006.

Preliminary Plan for Lodi Community Improvement Project, prepared by GRC Redevelopment Consultants, Inc, November 14, 2007

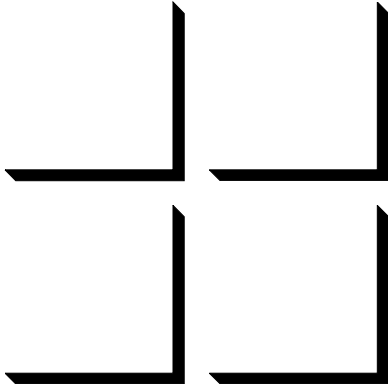
Feasibility Study for a Potential Redevelopment Project in East Lodi, prepared by GRC Redevelopment Consultants, Inc, October 19, 2007

7.2
PERSONS AND
ORGANIZATIONS
CONTACTED

- Blair King, City Manager, City of Lodi
- Peter Pirnejad, Planning Manager, City of Lodi

7.3
PREPARATION
STAFF

- Joann Lombardo, Principal Environmental Consultant
- Ernie Glover, Principal Project Consultant



GLOSSARY

San Joaquin Air Quality Management District (SJAQMD) – The San Joaquin Air Quality Management District is the regional Commission that oversees air quality compliance

California Environmental Quality Act (CEQA) – State of California Environmental Quality Act is promulgated in the California Public Resources Code Sections 21000-21178.1 (CEQA). In 1970, the California legislature established CEQA to provide and maintain a high quality environment for the people of California. To achieve this objective, CEQA provides a system of checks and balances for land use development and management decisions in California.

California Environmental Quality Act Guidelines (CEQA Guidelines) – Pursuant to Section 21083 of the Public Resources Code (CEQA), the CEQA Guidelines are a series of regulations prescribed by the State of California Secretary for Resources. These regulations (or guidelines) establish step-by-step procedures that all California state and local agencies are required to follow in order to comply with the provisions of CEQA.

Community Redevelopment Law (CRL) – Community Redevelopment Law (CRL) refers to the California Health and Safety Code Sections 33000 *et seq.* which govern the establishment of a redevelopment project area.

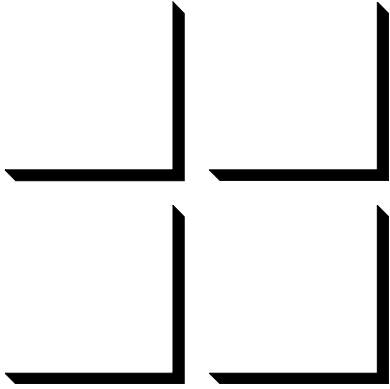
Environmental Impact Report (EIR) – Environmental Impact Report (EIR) is the environmental clearance document required to be prepared, pursuant to CEQA, for projects that may have a significant adverse impact on the environment.

Lead Agency – The Redevelopment Agency of the City of Lodi and City of Lodi.

Notice of Preparation (NOP) – Notice of Preparation (NOP) is the formal notice required under CEQA which informs concerned

public agencies and other concerned persons that an EIR is being prepared on the project.

Project – Section 21065 of the Public Resources Code (CEQA) defines a project as an activity that may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment. The Project in this EIR is the adoption and implementation of the Soscol Gateway Redevelopment Project.



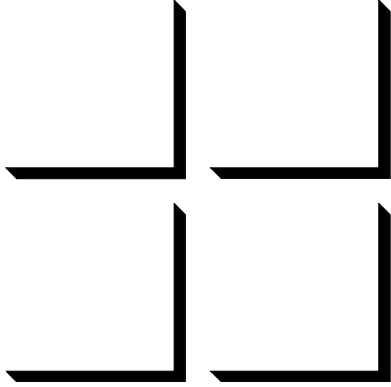
Appendix A

Initial Study and Notice of Preparation

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February 8, 2008

Initial Study for Lodi Community Improvement Project

REDEVELOPMENT AGENCY OF THE CITY OF LODI

GRC | GRC REDEVELOPMENT CONSULTANTS
701 S. Parker Street
Suite 7400
Orange, CA 92868

REDEVELOPMENT AGENCY OF THE CITY OF LODI

Notice of Preparation and Public Scoping Meeting

TO: _____ **FROM:** Redevelopment Agency of the City of Lodi
221 W. Pine Street
Lodi CA 95241-1910

Notice is hereby given that the City of Lodi acting as Lead Agency, with the Redevelopment Agency of the City of Lodi acting as both Responsible Agency and Applicant, will prepare an Environmental Impact Report (EIR) for the project identified below. We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project.

PROJECT TITLE: Lodi Community Improvement Project.

PROJECT APPLICANT: Redevelopment Agency of the City of Lodi, 221 W. Pine Street, Lodi CA 95241-1910

PROJECT DESCRIPTION: The Project is Redevelopment Plan for the approximately 2,400-acre area generally located east of Sacramento Street to the eastern border of the City, with some areas extending west to Ham Lane.

Due to the time limits mandated by State law, your response must be sent at the earliest possible date but not later than thirty (30) days after the date below.

Please send your response to: Blair King, City Manager, City of Lodi, 221 W. Pine Street, Lodi CA 95241-1910, (209) 333-6700. If applicable, please provide the name for a contact person in your agency.

SCOPING MEETING: Pursuant to Section 21083.9 of the Public Resources Code, a Scoping Meeting for interested agencies and members of the public will be held to discuss the proposed EIR and assist the Agency in identifying the range of actions, alternatives, mitigation measures, and significant effects to be analyzed in depth in the EIR. The Scoping Meeting will be part of a community meeting to discuss the proposed Project, and will be held at the time, date and place indicated below:

Time: 3 p.m. **Date:** February 20, 2008 **Place:** Large Conference Room next to City Council Chambers, 305 W. Pine Street, Lodi, CA

Date: February 8, 2008

Signature: _____

Blair King, City Manager
Redevelopment Agency of the City of Lodi

The Redevelopment Agency of the City of Lodi

Initial Study

for

Lodi Community Improvement Project

February 8, 2008

Prepared for:

Redevelopment Agency of the City of Lodi
221 W. Pine Street
Lodi CA 95241-1910
(209) 333-6700

Prepared by:

GRC Redevelopment Consultants, Inc.
701 South Parker Street, Suite 7400
Orange, California 92868
(714) 234-1122

Lodi Community Improvement Project

TABLE OF CONTENTS

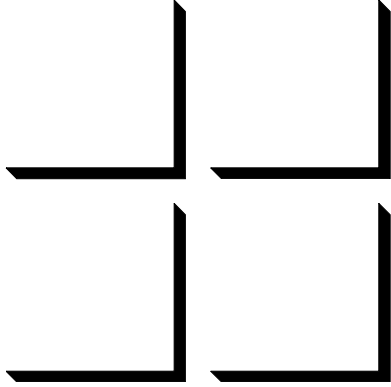
Preface.....	1
Conclusions and Findings	1
1.0 Project Description	3
2.0 Environmental Impacts.....	17
3.0 Determination.....	17
4.0 Criteria for Evaluation of Environmental Impacts	21
5.0 Environmental Impacts Analysis and Discussion.....	23
6.0 Sources Cited in Evalation of Environmental Impacts	43

LIST OF TABLES

1. Physical Conditions of Blight.....	10
2. Economic Conditions of Blight.....	11
3. Existing Land Uses	12

LIST OF FIGURES

1. Project Regional Location Map	4
2. Project Area Map.....	5



PREFACE

This Initial Study has been prepared in conjunction with Lodi Community Improvement Project in the City of Lodi (the “Project”). The Project is a proposal by the Redevelopment Agency of the City of Lodi (the “Agency”) to adopt a Redevelopment Plan for an approximately 2,400-acre area (“Project Area”). The intent of the Project is to abate the relative stagnation and conditions of blight in the Project Area, which is generally located east of Sacramento Street to the eastern border of the City, with some areas extending west to Ham Lane.

The adoption and implementation of a redevelopment plan is classified as a Project pursuant to the California Environmental Quality Act (CEQA; Public Resources Code Section 21000 *et seq.*). As such, this Initial Study has been prepared pursuant to State CEQA Guidelines Section 15063.

The City of Lodi (“City”) is the Lead Agency, with the Redevelopment Agency acting as Responsible Agency for this environmental review pursuant to the State Guidelines for Implementation of CEQA Section 15050. Consistent with these guidelines, this Initial Study identifies non-significant and potentially significant environmental impacts, and recommends that an Environmental Impact Report be prepared to address the identified potentially significant impacts.

CONCLUSIONS AND FINDINGS

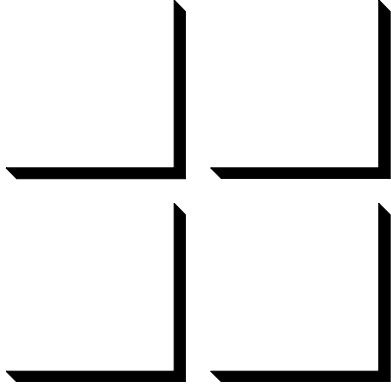
In accordance with California Community Redevelopment Law (Health and Safety Code Section 33000 *et seq.*; the “CRL”), future development within the Project Area that is directly or indirectly attributable to Agency activities must be consistent with land use

policies established within the applicable General Plan and Zoning Ordinance. The Land Use Element of the City of Lodi General Plan details policies related to the properties within the Project Area.

Because future development within the Project Area must occur within the established parameters of the prevailing General Plan, implementation of the Redevelopment Plan will not result in any unanticipated development or densities within the Project Area. Redevelopment programs and activities established and supported in conjunction with the Redevelopment Plan are ultimately intended to eliminate blighting conditions that constrain the ability of the Project Area to develop to its full General Plan potential.

Adoption of the Redevelopment Plan will allow the Agency to participate in various programs and activities aimed at encouraging private investment within the Project Area. These activities could accelerate the rate at which existing underutilized properties in the Project Area redevelop and convert to their General Plan designated land uses, and enable properties to redevelop that otherwise would not. This potential acceleration could directly or indirectly cause adverse environmental impacts resulting from incremental development over an extended period of time.

Environmental consequences of incremental growth could adversely impact agricultural resources, land use/planning, population and housing, traffic, air quality, cultural resources, public services, utilities, and mandatory findings of significance. These are the issues on which the pending Environmental Impact Report will focus.



1.0 PROJECT DESCRIPTION

A. Project Title:

Lodi Community Improvement Project

B. Name and Address of Lead Agency:

City of Lodi
221 W. Pine Street
Lodi CA 95241-1910
(209) 333-6700

C. Name and Address of Project Sponsor:

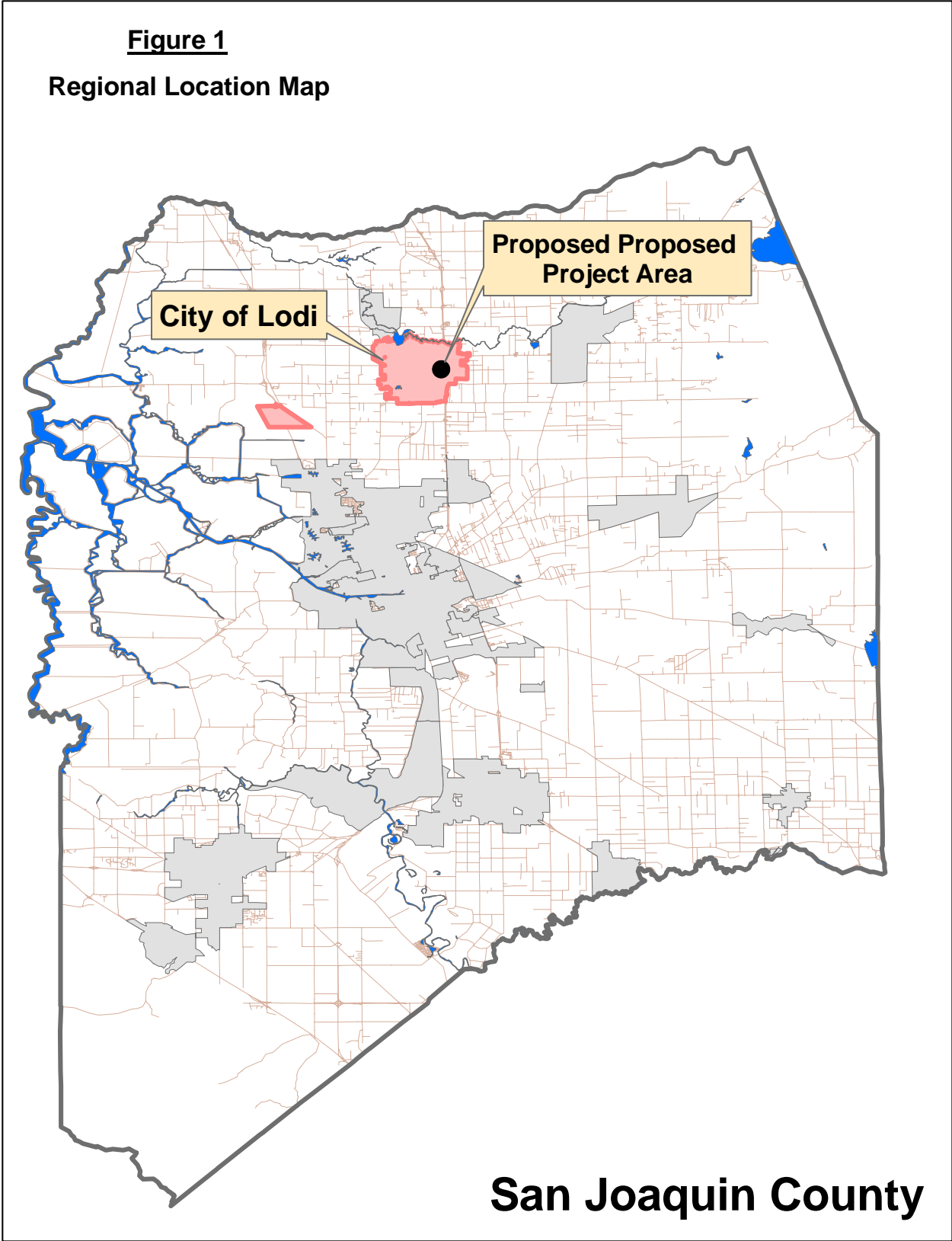
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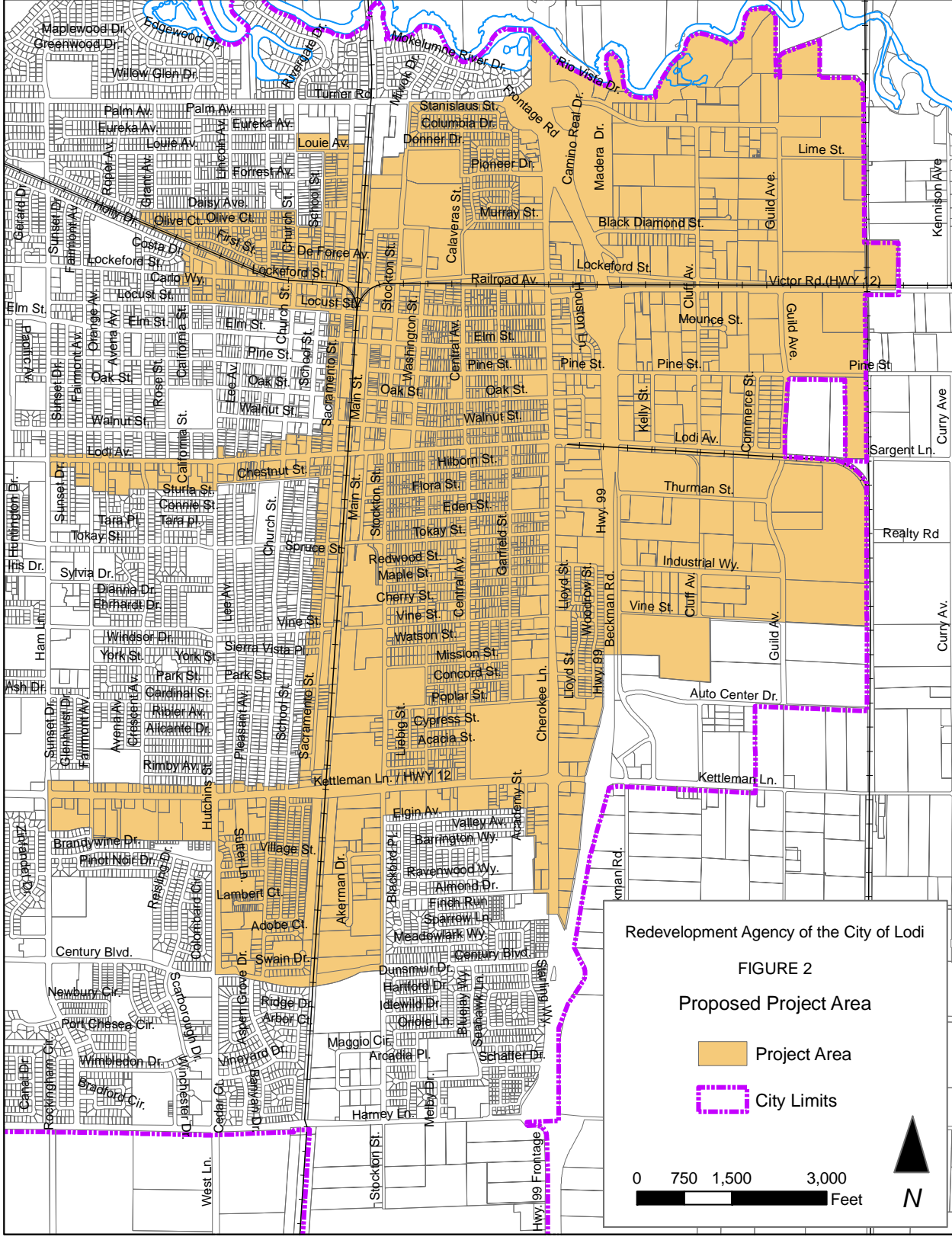
D. Contact Person and Phone Number:

Mr. Ernest Glover
GRC Redevelopment Consultants, Inc.
701 South Parker Street, Suite 7400
Orange, California 92868
(714) 234-1122

E. Project Location:

Lodi is located in the northern portion of San Joaquin County. The Project Area is generally located in the eastern portion of the City. (See Project Regional Location Map, Figure 1.) It is bordered on the north and east by the City boundaries. On the south, its boundary is irregular, bordered by Elgin Avenue and Century Boulevard. On the west, its boundary also is irregular, generally located just west of Sacramento Street, with portions extending as far west as Sunset Drive. (See Project Area Boundary Map, Figure 2.)





Redevelopment Agency of the City of Lodi

FIGURE 2

Proposed Project Area

Project Area

City Limits

0 750 1,500 3,000 Feet



F. Assessor's Book and Lot Number: Various.

G. Project Sponsor's Name and Address:

Blair King, City Manager
221 W. Pine Street
Lodi CA 95241-1910
(209) 333-6700

H. Description of Project: (Describe the whole action involved, including but not limited to later phases of the Project, and any secondary, support, or off-site features necessary for its implementation.)

The Project is a proposal by the Redevelopment Agency of the City of Lodi to adopt a Redevelopment Plan for the approximately 2,400 acre Project Area. The intent of the Redevelopment Plan is to abate the relative stagnation and conditions of blight in the area.

Project Background: The City of Lodi is one of the few cities in California that does not have a redevelopment project area. Yet, there are portions of the City in need of substantial improvements. A recent feasibility study of properties east of Sacramento Street found that, on a general basis, conditions of blight exist throughout the eastern part of the City.¹

Creating a redevelopment project under California Community Redevelopment Law (Health and Safety Code Section 33000 *et seq.*; the "CRL") would allow the City to raise funds for improvement of the area without raising taxes or creating new fees. Adoption of the proposed Project would allow the Agency to establish the Project Area and begin generating revenues for the area's improvement.

Project Goals: Below is a list of potential goals of the Redevelopment Plan. These goals will be refined, expanded upon, or otherwise modified as part of the adoption process.

- Improve infrastructure
- Stimulate new commercial, industrial, and residential construction
- Rehabilitate and modernize existing commercial, industrial, and residential properties
- Aid the preservation of historic structures and neighborhoods

¹ Feasibility Study for a Potential Redevelopment Project in East Lodi, October 19, 2007, GRC Redevelopment Consultants, Inc.

- Enhance the appeal of the east side neighborhoods as a place to live
- Alleviate problems associated with uses that do not conform to the General Plan or are incompatible with adjacent uses
- Improve the overall aesthetics of the area, including property maintenance, streetscape improvements, landscaping, signage, and billboard removal
- Reduce crime and graffiti
- Create local job opportunities by preserving and expanding the area's existing employment base
- Establish modern, convenient commercial outlets to serve the needs of nearby neighborhoods and travelers
- Eliminate or alleviate environmental hazards
- Expand and upgrade the community's supply of affordable housing
- Develop housing programs to assist with home ownership
- Assist with the assembly of parcels into more-developable sites
- Improve and/or construct community facilities, parks, and public uses
- Construct/replace missing sidewalks, aging water and wastewater facilities
- Install water meters
- Construct police and fire facilities
- Upgrade library facilities
- Improve American Disability Act (ADA) access
- Improve circulation and pedestrian mobility
- Assist with the promotion of tourism
- Promote infill development and smart growth principals
- Promote sustainable development and reduce energy consumption.

I. Existing Setting: (Briefly describe the Project site's existing land uses and features)

Blighting Conditions: The primary impetus for the proposed Redevelopment Plan is to remove existing conditions of blight in the Project Area. These blighting conditions include: building deterioration, obsolete commercial structures,

piecemeal development, antiquated parcel shapes and sizes, junk and equipment openly stored, and old or nonexistent infrastructure are just some of the problems that contribute to the overall decline of the community.²

Conditions of building deterioration include damaged roofs and exterior walls, bare plywood or other inappropriate building material, wood rot, chunks of missing plaster or stucco, and large areas of peeling paint. These conditions occur in both the commercial and residential portions of the Project Area.

Thousands of structures in the Project Area are expected to contain asbestos, lead-based paint, or other common hazardous materials. Other forms of hazardous materials may exist in the auto-related businesses along Cherokee Lane and Kettleman Lane, and in the industrial areas by the railroad tracks and east of Highway 99.

Numerous public facilities within the Project Area are in need of improvement. Inadequate public facilities include:

- Streets in poor condition;
- Curbs, gutters, and sidewalks in poor condition (or non-existent);
- Drainage problems;
- Lack of parking;
- Exposed utility lines;
- Lack of landscaping; and
- Water and sewer lines in need of upgrade.

Tables 1 and 2 below summarize specific physical and economic conditions of blight that were found during recent field work completed as part of the feasibility study. The tables also provide a measure of the extent of each condition based on initial preliminary observations.

Each characteristic of blight (as defined by CRL) was evaluated and given an initial ranking of "minor," "moderate," or "extensive," based on the following criteria:

Minor - Of limited extent or importance throughout the entire area, but may be concentrated in one particular location. Not in and of itself a significant blighting characteristic, but may contribute to other conditions of blight.

² Feasibility Study for a Potential Redevelopment Project in East Lodi, October 19, 2007, GRC Redevelopment Consultants, Inc.

Moderate - While not widely spread or of major importance, it is a major blight characteristic in one or a few areas. Contributes significantly to overall blight, but not a prevalent characteristic of blight in and of itself.

Extensive - Of widespread extent and importance throughout the entire area, and is a commonly found characteristic in most, if not all, of the area. In and of itself can be considered a prevalent characteristic of blight.

Table 1
PHYSICAL CONDITIONS OF BLIGHT

PHYSICAL CONDITION	PRESENCE	EXTENT	NOTES
Buildings in which it is unsafe or unhealthy for persons to live or work. These conditions may be caused by serious building code violations, serious dilapidation and deterioration caused by long-term neglect, construction that is vulnerable to serious damage from seismic or geologic hazards, and faulty or inadequate water or sewer utilities.	Yes	Minor/ Moderate	Severe building dilapidation is relatively minor; however, code violations could be extensive and there is a significant likelihood of hazardous material presence with asbestos and lead-based paint.
Conditions that prevent or substantially hinder the viable use or capacity of buildings or lots. These conditions may be caused by buildings of substandard, defective, or obsolete design or construction given the present general plan, zoning, or other development standards.	Yes	Extensive	Significant commercial obsolescence. Significant infrastructure deficiencies. Significant building rehabilitation and maintenance needs. Obvious piecemeal development with no apparent plan. Minimal construction and design standards. Lack of landscaping and pedestrian amenities in commercial areas.
Adjacent or nearby incompatible land uses that prevent the development of those parcels or other portions of the Project Area.	Yes	Moderate/ Extensive	Many residences are located adjacent to commercial and industrial uses without adequate buffers. There are also residences located in commercial and industrial areas.
The existence of subdivided lots that are in multiple ownership and whose physical development has been impaired by their irregular shapes and inadequate sizes, given present general plan and zoning standards and present market conditions.	Yes	Moderate/ Extensive	Many commercial parcels too small or too oddly shaped for expansion or new modern development.

Table 2
ECONOMIC CONDITIONS OF BLIGHT

ECONOMIC CONDITION	PRESENCE	EXTENT	NOTES
Depreciated or stagnant property values.	Yes	Moderate/ Extensive	Property values in Study Area are lower than rest of City. Many commercial and industrial buildings are obsolete and have not seen much reinvestment, if at all. Lack of adequate parcel shapes and sizes hinders economic growth.
Impaired property values, due in significant part, to hazardous wastes on property where the agency may be eligible to use its authority.	Likely	Moderate/ Extensive	Number of auto-related business and manufacturing uses indicates an existence of hazardous materials.
Abnormally high business vacancies, abnormally low lease rates, or an abnormally high number of abandoned buildings.	Yes	Minor/ Moderate	Number of vacancies appears to be above normal, vacancies are for extended periods, which adds to decline of area.
A serious lack of necessary commercial facilities that are normally found in neighborhoods, including grocery stores, drug stores, and banks and other lending institutions.	Yes	Moderate	Adequate and modern neighborhood commercial uses, such as supermarkets and drug stores, are lacking in the area.
Serious residential overcrowding that has resulted in significant public health or safety problems.	Unlikely, but possible	Unknown	Residential overcrowding does not appear to be a problem, but additional study is needed.
An excess of bars, liquor stores, or adult-oriented businesses that has resulted in significant public health, safety, or welfare problems.	Possible	Unknown	Adult uses exist in the form of a topless business, massage parlor, and several liquor-related establishments. Additional study is needed.
A high crime rate that constitutes a serious threat to the public safety and welfare.	Likely	Moderate/ Extensive	Poor building conditions and commercial uses oriented to travelers often result in higher crime areas. Police statistics will be needed to fully characterize.

Existing Land Uses: The existing land uses in the Project Area are predominantly commercial, industrial, and residential. Some public uses and vacant land are scattered throughout. Table 3 shows the estimated breakdown of existing land uses.

**Table 3
EXISTING LAND USES IN THE PROJECT AREA**

USE	# OF ACRES	% OF TOTAL ACREAGE
Single Family Residential	340	14
Multiple Family Residential	180	7
Mobile Home Park	40	2
Commercial	285	12
Industrial	540	22
Institutional	50	2
Agriculture	25	1
Public	240	10
Vacant	210	9
SUB-TOTAL	1,910	79
Streets/Rights-of-way	515	21
TOTAL	2,425	100%

The existing agricultural uses include vineyards in the northeast part of the Project Area. These vineyards are located on land designated by the City General Plan and Zoning Map for urban land uses.

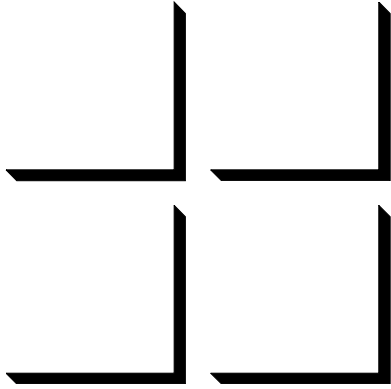
Industrial uses are generally located east of Highway 99. Commercial uses are generally located along the arterial roadways including, Cherokee Lane, Lodi Avenue and Kettleman Lane. Public uses are mostly schools, scattered throughout the Project Area.

I. Describe the Surrounding Land Uses:

Areas west and south of the Project Area are predominantly residential and located within the City of Lodi boundaries. Areas north and east of the Project Area are predominantly agriculture and are located within unincorporated San Joaquin County.

J. List and Describe Any Other Related Permits and Other Public Approvals Required for This Project, Including Those Required by City, Regional, State, and Federal Agencies:

Adoption of the Plan will be by ordinance of the City Council of the City of Lodi. No other permits or approvals from other public agencies are required.

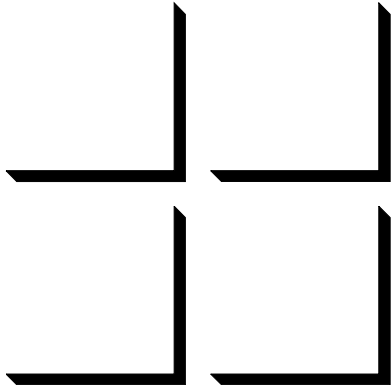


2.0 ENVIRONMENTAL IMPACTS

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. Additionally, environmental factors relevant to implementation of the Project and intended for inclusion in the EIR are also checked.

- | | | |
|---|--|--|
| <input type="checkbox"/> Aesthetics | <input checked="" type="checkbox"/> Agriculture Resources | <input checked="" type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology/Soils |
| <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Hydrology/Water Quality | <input checked="" type="checkbox"/> Land Use/Planning |
| <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Noise | <input checked="" type="checkbox"/> Population/Housing |
| <input checked="" type="checkbox"/> Public Services | <input type="checkbox"/> Recreation | <input checked="" type="checkbox"/> Transportation/Traffic |
| <input checked="" type="checkbox"/> Utilities/Service Systems | <input checked="" type="checkbox"/> Mandatory Findings of Significance | |

Pursuant to these findings of potential significance and the requirements of the CRL and CEQA guidelines, a program EIR will be prepared for the Project. The program EIR is expected to focus on issues related to the environmental topics of land use/planning, traffic, air quality, public services, utilities, and mandatory findings of significance.



3.0 DETERMINATION

On the basis of this initial evaluation:

- I find 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 the mitigation measures described on an attached sheet have been added to the Project. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find the proposed Project MAY have a significant effect on the specific environmental issues, and a focused program ENVIRONMENTAL IMPACT REPORT is required.

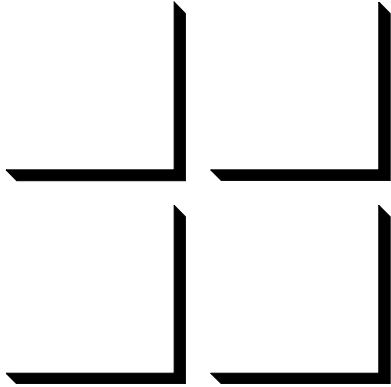
Date: 1/3/08

Blair King, City Manager
Redevelopment Agency of the City of Lodi
Telephone: (209) 333-6700

CERTIFICATION: I hereby certify that the statements furnished above and in the attached exhibits present the data and information required for this initial evaluation to the best of my ability, and that the facts, statements, and information presented are true and correct to the best of my knowledge and belief.

Date: 1/3/08

Ernest W. Glover, GRC Redevelopment Consultants, Inc.
Telephone: (714) 234-1122



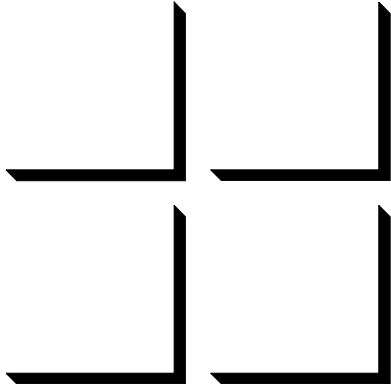
4.0 CRITERIA FOR EVALUATION OF ENVIRONMENTAL IMPACTS

An Environmental Checklist Form (Form) has been used to evaluate the potential environmental impacts associated with the proposed project. The Form has been prepared by the Resources Agency of California to assist local governmental agencies, such as the City of Lodi, in complying with the requirements of the Statutes and Guidelines for implementing the California Environmental Quality Act. In the Form, environmental effects are evaluated as follows:

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 its response. 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

are 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 an "Earlier Analyses," as described in #5 below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. 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 which 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).
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. The explanation of each issue should identify:
 - (a) The significance criteria or threshold, if any, used to evaluate each question.
 - (b) The mitigation measure identified, if any, to reduce the impact to less than significance.



5.0 ENVIRONMENTAL IMPACTS ANALYSIS AND DISCUSSION

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporation</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
I. AESTHETICS. Would the Project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation: I.a-d. *No Impact.* Scenic resources identified in the City General Plan include areas surrounding Lodi Lake and Mokelumne River and views of Lodi Lake and Mokelumne River. Lodi Lake is located west of the Project Area; Mokelumne River forms the northern boundary of the City and is adjacent to the northern boundary of the Project Area. The City, in conjunction with the City of Stockton and County of San Joaquin, recently developed a concept plan for a Lodi Greenbelt located south of Harney Lane, which is south of the Project Area. As noted above, the primary purpose of the Redevelopment Plan is to facilitate the removal of blight from the Project Area. Consequently, the Project is expected to have a demonstrable positive aesthetic effect on the Project Area and its scenic resources.

Any future development activities in the Project Area will be subject to General Plan policies, including those that govern the protection of scenic resources and vistas, and the location and intensity of land uses. Consequently, the Project is not expected to adversely affect scenic resources or vistas, or substantially degrade the existing visual character or quality of the site and its surroundings. Future development may produce new sources of light and glare that would come from parking lot and building lighting. Accepted planning

polices are expected to reduce these potential impacts to an acceptable level. Consequently, no significant adverse impacts from the Project relative to the above-defined aesthetics factors are expected to occur.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
II. AGRICULTURE 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 Dept. of conservation as an optional model to use in assessing impacts on agriculture and farmland.				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Explanation: II.a-b. *Less Than Significant.* According to the San Joaquin County Important Farmland Map¹, the Project Area is designated as Urban, containing are no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), in the Project Area. According to a review of the assessor parcel rolls conducted in support of the Redevelopment Plan efforts², there are no known Williamson Act contracts in the Project Area. Although, as noted in Table 3, there are currently vineyards in the proposed Project Area. These vineyards are located on land designated by the City General Plan and Zoning Map for urban land uses. Consequently, Project impacts relative to conversion of Prime, Unique or Farmlands of Statewide Importance, and to conflicts with existing zoning or a Williamson Act are considered less than significant.

c. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Explanation: II.c. *Potentially Significant.* As noted in Table 3, there are currently approximately 25 acres of vineyards in the Project Area, which are located in the northern part of the Project Area. These vineyards are located on land designated by the City General Plan and Zoning Map for urban land uses. They are interspersed throughout the Project Area, surrounded by parcels that are already developed with urban land uses. As noted above, the entire Project Area is identified as Urban by the San Joaquin County Important Farmland Map. However, by accelerating the transition of nonconforming

¹ http://www.sjmap.org/mapdocs/FrontCounter_Important_Farmland.pdf; accessed 1/23/08

² Feasibility Study for a Potential Redevelopment Project in East Lodi, October 19, 2007, GRC Redevelopment Consultants, Inc.

properties to their General Plan designated use, the Project could accelerate the conversion of the existing vineyards to non-agricultural use. The EIR for the Project will evaluate potential impacts related to conversion of agricultural lands, and where feasible, will propose mitigation measures to reduce these impacts.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
<p>III. AIR QUALITY. Where applicable, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.</p> <p>Would the Project:</p> <p>a. Conflict with or obstruct implementation of the applicable air quality plan?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Explanation: III.a. <i>No Impact.</i> The City of Lodi, inclusive of the Project Area, lies within the San Joaquin Valley Air Pollution Control District (SJVAPCD). The General Plan promulgates development types and intensities consistent with the SJVAPCD that govern stationary and mobile sources of air pollutants in the County. Any development proposed within the Project Area, including those that receive Agency assistance, are required to be reviewed and processed in accordance with the CEQA, and SJVAPCD and General Plan air quality provisions relative to pollutants and odors. As appropriate, individual mitigation measures shall be applied. Adoption and implementation of the proposed Redevelopment Plan will not affect the existing project review process. Redevelopment activities are expected to stimulate the elimination of blight and the pace of new energy-efficient development. Consequently, the Project is not expected to cause adverse impacts to the above-defined air quality impact.</p>				
b. Violate any air quality standard or contribute substantially to an existing or Projected air quality violation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Create objectionable odors affecting a substantial number of people?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Explanation: III.b-e. *Potentially Significant.* Pollutants are introduced into the Air Basin through a variety of natural and man-made sources, although the vast majority of the air pollution in the local vicinity can be attributed to mobile sources, such as motor vehicles. Implementation of the Redevelopment Plan will not contribute to any existing air quality violations. Although mitigation measures to limit increases in air emissions will be adopted pursuant to the SJVAPCD and City policy, future new development and redevelopment in the Project Area could result in incremental increases in local air

pollutant and particulate emissions. The exact character of such new development is not known, and whether or not such emissions would result is indeterminable at this time. Such increases in air pollutants may accelerate beyond available mitigation, resulting in potentially significant adverse impacts.

The EIR for the Project will evaluate potential impacts related to the above-defined air quality factors. In addition, to respond to the recently enacted State of California AB 32 - Global Warming Solutions Act of 2006, effective as of January 2007, a discussion of potential effects of global warming and an update of state regulation to address global warming will be included in the EIR. In the context of global warming impacts, the evaluation will consider how the Project would affect the overall sustainability of the community. Where potentially adverse impacts are identified, the EIR will propose, where feasible, mitigation measures to reduce these impacts.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
IV. 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 Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinance protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Explanation: IV. a-f. *Less Than Significant.* San Joaquin County has developed and

implemented a Multi-Species Habitat Conservation and Open Space Plan (SJMSCP). The San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP) provides a strategy for balancing the conversion of open space to non-open space uses with the need for the long-term management of plant, fish and wildlife species, especially those that are currently listed, or may be listed in the future, under the Federal Endangered Species Act (FESA) or the California Endangered Species Act (CESA). The SJMSCP resulted from the San Joaquin Council of Governments' efforts to develop a regional approach to managing the biological resources of the County.

The SJMSCP describes best management practices and establishes testing protocols and mitigation procedures for the loss of habitat and associated incidental Takes resulting from the conversion of open space in the County over the next 50 years. All permanent impacts to habitats within San Joaquin County and the species to which associated impacts could occur are covered by the SJMSCP. The SJMSCP is implemented by the various local permitting jurisdictions within the County, including the City of Lodi. The SJMSCP provides compensation for the Conversion of Open Space to non-Open Space uses, which affect the plant, fish, and wildlife species covered by the Plan. The SJMSCP covers 97 species, including 25 species that are state- or federally-listed as endangered or threatened. The SJMSCP protects the covered species by establishing habitat preserves and requiring protection measures to be implemented for activities that may incidentally kill or injure a covered species. Mitigation of unavoidable impacts to species covered in the SJMSCP emphasizes compensation for habitat losses through the establishment, enhancement and management of habitat preserves. The preserves are normally located outside of designated existing and planned urban boundaries.

The Project Area is not within an open space preserve area identified in the SJMSCP. Rather, the Project Area is classified by the SJMSCP as urban lands. Future development activity within the Project Area would be required to comply with applicable provisions of the SJMSCP. Compliance with the SJMCP is expected to reduce potentially adverse impacts to biological resource habitats, sensitive species, wildlife movements, and biological resource protection policies and conservation plans to less than significant levels.

Potential for wetlands is greatest in the vicinity of the Mokelumne River. As part of the City's standard development reiview process, future development activities in potential wetland areas would be required to provide a wetlands delineation study in accordance with the 1987 Corps of Engineers Wetland Delineation Manual (Routine Method). Compliance with this standard procedure is expected to reduce potentially adverse impacts to federally protected wetlands to less than significant levels.

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporation</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
V. CULTURAL RESOURCES. Would the Project:				
a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Explanation: *V. a. Potentially Significant.* The City of Lodi, formerly the Town of Mokelumne, was incorporated in 1906. Lodi’s historical resources include the Lodi Arch, Hotel Lodi, the old opera house, City Hall, and the Carnegie Library. The Lodi Arch was constructed in 1907, spanning Pine Street at Sacramento Street, as part of a large carnival advertising Tokay grapes. It is located in the northwesterly portion of the Project Area. Other City historical resources also are located within the proposed Project Area. Implementation of the Redevelopment Plan could accelerate growth and place new development pressure on existing historic resources. The EIR for the Project will evaluate potential impacts related to historic resources, and where feasible, will propose mitigation measures to reduce these impacts.

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Disturb any human remains, including those interred outside of formal cemeteries? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: *V. b-d. No Impact.* According to the General Plan EIR, there are two reported Native American occupation/burial sites along the Mokelumne River in the northern Lodi. Both sites have been heavily disturbed by levee construction and residential development. No paleontological resources or internment sites been identified in or in the vicinity of the Project Area.

The City General Plan promulgates regulations to protect the City’s archaeological or paleontological resources. Any development that occurs within the Project Area, including those that receive Agency assistance, are required to be reviewed and processed in accordance with the applicable policies. Therefore, there is no identified potential for the Project to impact the above-listed cultural resources.

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporation</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
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VI. GEOLOGY AND SOILS. Would the Project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Expose people or structures to 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. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ii. Strong seismic ground shaking? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| iii. Seismic-related ground failure, including liquefaction? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| iv. Landslides? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b. Result in substantial soil erosion or the loss of topsoil? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: VI. a-e. *Not Significant.* Geographically, the City of Lodi is underlain by a vast thickness of alluvium derived from the ancestral Sierra Nevada mountains. This unconsolidated and semiconsolidated material grades downward into consolidated sedimentary rocks. As with much of California, the Lodi area is subject to earthquake damage. No faults are known to cross the City or Project Area; however, groundshaking from an earthquake outside the City could cause damage to structures. Areas adjacent to the Mokelumne River, where the water table is near the surface have the greatest potential for liquefaction.

Construction projects in the City are required to comply with the California Building Code, which is intended to reduce structural risks related to unstable geologic or soil conditions. The Redevelopment Plan is not expected to create impacts to the soil, topography, native geologic structures, or increase impacts to the area in the event of a seismic event. Therefore, the potential of the Project to cause adverse impacts relative to the above-defined geology and soils factors is not considered significant.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
VII. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Explanation: VII. a-d. *Less Than Significant.* Any new commercial or industrial uses to locate in or adjacent to the Project Area would be subject to federal and state regulations and local ordinances that regulate the transport, manufacture, use and disposal of hazardous materials. These regulations and ordinances are expected to reduce potential adverse impacts relative to hazardous materials in the Project Area to less than significant levels.

Older buildings in the Project Area could contain asbestos-containing materials or lead-based paints, both federally regulated hazardous materials. Other forms of hazardous materials may exist in the auto-related businesses along Cherokee Lane and Kettleman Lane, and in the industrial areas by the railroad tracks and east of Highway 99. The Project could provide a source of funding to assist with the removal of such materials. Therefore, the potential for any adverse impacts on the environment due to hazards and hazardous materials is less than significant, and no mitigation is required.

- | | | | | | |
|----|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 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 for people residing or working in the Project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f. | For a Project within the vicinity of a private airstrip, would the Project result in a safety hazard for people residing or working in the Project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| g. | Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| h. | Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: VII. e-h. *No Impact.* There is no airport or air strip in the vicinity of the Project Area. Future development and redevelopment activities in the Amendment Area will be subject to City public safety requirements, including adopted emergency response and evacuation plans, consequently no impacts to these plans are expected. The Project Area has little native vegetation, and is not subject to wildland fires. Consequently, the Project is not expected to result in significant adverse impacts relative to the above listed hazard and hazardous materials topics.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
VIII. HYDROLOGY AND WATER QUALITY. Would the Project:				
a. Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j. Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation: VIII. a-j. *No Impact.* The City is within the Central Valley, which contains three major watersheds: the Sacramento River Basin, the San Joaquin River Basin and the Tulare Lake Basin. Drainage and flood control facilities in the Project Area are maintained by the City of Lodi. The City of Lodi municipal storm drainage system consists of an integrated system of trunk lines, detention basins, and pump stations. Surface infrastructure such as gutters, alley, and storm ditches provide for collection of stormwater into the system. The city's stormwater drainage system includes 16 storm outlets to the Mokelumne River, Lodi Lake, or the WID Canal. Since most of the drainage area slopes away from the Mokelumne River toward the southwest, the majority of the

city’s drainage would eventually discharge into the WID Canal. Drainage facilities proposed within the City of Lodi are required to be designed and constructed to the City of Lodi standards.

Section 402 of the Clean Water Act regulates the degradation of water quality. This regulation established the National Pollution Discharge Elimination System (NPDES), which is enforced in the project area by the Central Valley Regional Water Quality Control Board (RWQCB). Section 402 prohibits the unauthorized discharge of pollutants from a point source (pipe ditch, well, etc.) to U.S. waters, including municipal, commercial, and industrial wastewater discharges and discharge from large animal feed operations. In addition to point source polluters, the NPDES manages non-point source pollutants by requiring local governments to obtain an NPDES Permit for municipal stormwater and urban runoff discharges in their jurisdiction.

The narrow strip of land on the northern boundary of the Project Area between the Mokelumne River and the levees, comprising approximately 400 acres, is subject to flooding from a 100-year flow. The City storm drainage system and policies related to flooding and drainage are expected to control potentially adverse impacts related to flooding. Funds raised through the Redevelopment Plan would be available to assist with the improvements to curbs, gutters and flood control facilities. By assisting with these improvements, the Project could have a beneficial impact on the hydrology and water quality in and around the Project Area. Any development that occurs within the Project Area, including those that receive Agency assistance, are required to be reviewed and processed in accordance with the City and regional water quality goals and policies. Therefore, there is no identified potential for the Project to impact to hydrology and water quality issues.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
IX. LAND USE AND PLANNING. Would the Project:				
a. Physically divide an established community?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Be incompatible with existing land use in the vicinity?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to the general plan, General Plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Explanation: IX. a-c. *Potentially Significant.* The City is in the process of preparing a comprehensive update to the General Plan. As required by the CRL, future development in the Redevelopment Plan will be required to be consistent with these plans upon their adoption. However, the Redevelopment Plan could accelerate the rate of growth in the Project Area, which could occur in advance of proposed General Plan changes being adopted. This acceleration could affect established communities within the Project Area, existing land uses in the vicinity of the Project Area as well compliance with applicable

land use plans. To ensure the Redevelopment Plan considers the policies of these proposed as well as already adopted plans, the EIR for the Project will evaluate potential impacts related to the above-listed land use and planning topics. Where potentially adverse impacts are identified, the EIR will propose, where feasible, mitigation measures to reduce these impacts.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
X. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, General Plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation: X. a-b. *No Impact.* There are no known mineral resources of value nor any locally important mineral resource recovery sites within the Project Area. As shown in Table 3, above, the land in the Project Area is designated by the General Plan for a mix of urban uses. All activities accomplished pursuant to the Redevelopment Plan will be consistent with the General Plan. Consequently, the Project will not cause the loss of availability of a known mineral resource or locally important mineral resource recovery site delineated on a local plan.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
XI. NOISE. Would the Project result in:				
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. A substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. A substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 expose people residing or working in the Project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- f. For a Project within the vicinity of a private airstrip, would the Project expose people residing or working in the Project area to excessive noise levels?

Explanation: XI. a-d. *Less Than Significant.* As the level of residential, commercial and industrial activity intensifies in the Project Area, existing noise levels from local traffic increases also may occur. High noise levels associated with construction activities involved in development and redevelopment may cause temporary impacts. However, noise standards established by the General Plan Noise Element and regulated through the City Noise Ordinance regulate potential noise impacts from new development as well as construction noise. Therefore, the potential for significant adverse impacts on the environment relative to ambient noise or ground vibrations in the Amendment Area or as a result of Project implementation is less than significant, and no mitigation is required.

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporation</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
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XII. POPULATION AND HOUSING. Would the Project:

- a. Induce substantial 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)?

Explanation: XII. a. *Potentially Significant.* As discussed under item IX, above, the proposed Project is not a land use proposal. Rather, it is an enabling tool to be used by the Agency for the purpose of raising funds to encourage the rehabilitation and upgrading of currently underutilized land to more efficient uses with greater economic potential. However, the Redevelopment Plan could accelerate the rate of growth in the Project Area, which could occur in advance of proposed General Plan changes being adopted. This acceleration could induce population growth within the Project Area in a manner not consistent with pending General Plan land use changes. The EIR for the Project will evaluate whether the Redevelopment Plan could induce substantial growth. Where potentially adverse impacts are identified, the EIR will propose, where feasible, mitigation measures to reduce these impacts.

- b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?
- c. Displace substantial number of people, necessitating the construction of replacement housing elsewhere?

Explanation: XII. b-c. *Less Than Significant.* Some displacements of businesses could occur because of the redevelopment activities that the Project will facilitate. However, the Lodi Community Improvement Project will not include the ability to acquire property through eminent domain, and funds raised through the Redevelopment Plan will be available to assist with relocation of businesses in accordance with the Relocation Assistance Guidelines adopted by the Agency. These relocation efforts, which would be implemented consistent with CRL, are expected to reduce potential impacts associated with displacement to less than significant levels; no mitigation measures are necessary.

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporation</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
XIII. PUBLIC SERVICES. Would the Project:				
a. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Schools?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Explanation: XIII. a. *Potentially Significant.* Redevelopment activities resulting from adoption and implementation of the Redevelopment Plan could increase the rate of development in the Project Area, and subsequently could accelerate demand for fire protection, police protection, schools, public facility maintenance and other governmental services. There may be discrepancies between the City’s proposed land use policies for the area and public service capacities. The need for public services could accelerate beyond available capacity, resulting in potentially significant adverse impacts. The EIR for the Project will evaluate current public service levels, identify any existing or expected deficiencies and assess whether the Project would result in potentially significant adverse impacts related to the above-defined public service factors. Where potentially adverse impacts are identified, the EIR will propose, where feasible, mitigation measures to reduce these impacts.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
XIV. RECREATION.				
a. Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation: XIV. a-b. *No Impact.* No specific recreation projects are identified by the Project at this time. In addition, because the Redevelopment Plan will be consistent with land use policies of the General Plan, the Redevelopment Plan will not increase demand for recreational facilities above and beyond that contained in the General Plan. Therefore, no public recreational facilities are expected to be negatively affected by implementation of the Redevelopment Plan.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
XV. TRANSPORTATION/TRAFFIC. Would the Project:				
a. Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Explanation: XV. a-b. *Potentially Significant,* Minor modifications to the layout and routing of existing streets and/or alleys are possible during the implementation process if the Redevelopment Plan is ultimately approved. Other such changes may be proposed as redevelopment proceeds. It is expected that some street extensions and closures, paving, and other improvements, including the construction of curbs, gutters, and local drains, will occur.

Future development of underutilized portions of the Project Area that may result from implementation of the Redevelopment Plan will increase the overall intensity of activity in the Project Area. This will, in turn, increase traffic generation. Although such increases in development and traffic generation will be consistent with the General Plan, increases in traffic volumes may accelerate beyond available roadway capacity, resulting in potentially significant adverse impacts. The EIR for the Project will evaluate potential impacts related to the above-defined transportation and traffic factors. Where potentially adverse impacts are identified, the EIR will propose, where feasible, mitigation measures to reduce these impacts.

- c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?
- d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- e. Result in inadequate emergency access?
- f. Result in inadequate parking capacity?
- g. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

Explanation: XV. c-g. *No Impact.* As discussed above, all development and redevelopment activities pursuant to the Redevelopment Plan will be consistent with the General Plan and concomitantly, its implementation policies relative to air traffic patterns, roadway design hazards, emergency access, and parking. Improvements constructed in connection with the Plan Amendment are expected to improve emergency access, alleviate existing parking deficiencies, support an adequate supply of parking for new development, and upgrade pedestrian and bicycle circulation. Consequently, no significant adverse impacts relative to the above-defined transportation factors are expected to result from the Project.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
XVI. UTILITIES AND SERVICE SYSTEMS. Would the Project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Have sufficient water supplies available to serve the Project from existing entitlements and resources, or are new or expanded entitlements needed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's Projected demand in addition to the provider's existing commitments?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Comply with federal, state, and local statutes and regulations related to solid waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Explanation: XVI. a-g. *Potentially Significant Impact.* Future development of underutilized portions of the Project Area that may result from implementation of the Redevelopment Plan will increase the overall intensity of activity in the Project Area. This will, in turn, increase demand of utility and service systems, which could accelerate beyond available capacity, resulting in potentially significant adverse impacts. The EIR for the Project will evaluate potential impacts related to the above-defined utility and service system factors. Where potentially adverse impacts are identified, the EIR will propose, where feasible, mitigation measures to reduce these impacts.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
XVII. 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, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

examples of the major periods of California history or prehistory?

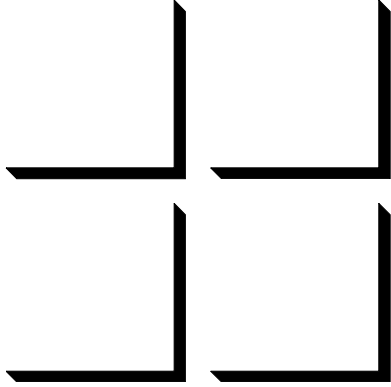
Explanation: *Potentially Significant.* As discussed under item IV, above, future new development and redevelopment in the Project Area are not expected to impact biological resources, which are protected through the SJMSCP. However, the existing historic structures within the Project Area could be affected by the proposed Redevelopment Plan. Further assessment of the Project’s potential to degrade the quality of the environment will be provided in the Draft EIR.

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

Explanation: *Potentially Significant.* As discussed under item XV, above, future new development and redevelopment in the Project Area could result in air pollutant and traffic increases, and public service and utility demands that are not fully mitigated by existing City policies. These conditions could result in cumulative impacts requiring mitigation. Further assessment of potential cumulative air quality and traffic impacts associated with the Project will be provided in the Draft EIR.

- c. Does the Project have environmental effects which will cause substantial adverse effects to human beings, either directly or indirectly?

Explanation: *Less Than Significant.* All future development and redevelopment activities accomplished under the proposed Redevelopment Plan are expected to conform to applicable federal, state and local guidelines. These regulations and ordinances are expected to reduce potential adverse impacts relative to environmental effects to human beings to less than significant levels. Therefore, the potential for any adverse impacts on the environment due to these effects is less than significant, and no mitigation is required.



6.0 SOURCES CITED IN EVALUATION OF ENVIRONMENTAL IMPACTS

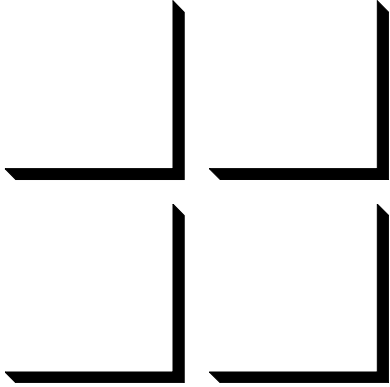
Section 15150 of the State CEQA Guidelines permits an environmental document to incorporate by reference other documents that provide relevant data. The documents outlined below are hereby incorporated by reference, and the pertinent material is summarized throughout this Initial Study where that information is relevant to the analysis of impacts of the proposed Project. All documents incorporated by reference are available for review at the Redevelopment Agency of the City of Lodi, 221 W. Pine Street, Lodi CA 95241-1910, (209) 333-6700. The office hours are Monday through Friday between 8:00 AM and 5:00 PM.

1. *City of Lodi General Plan* (current)
2. *City of Lodi Draft General Plan Draft Environmental Impact Report*, prepared by Jones & Stokes, Inc., January 1990.
3. *Draft Environmental Impact Report, Lodi Shopping Center*, prepared by Pacific Municipal Consultants, August 2004.
4. *Lodi Annexation Environmental Impact Report*, prepared by LSA, April 2006.
5. Reynolds Ranch Project Final Environmental Impact Report, prepared by WILLDAN, August 2006.
6. Preliminary Plan for Lodi Community Improvement Project, prepared by GRC Redevelopment Consultants, Inc, November 14, 2007
7. *Feasibility Study for a Potential Redevelopment Project in East Lodi*, prepared by GRC Redevelopment Consultants, Inc, October 19, 2007



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Appendix B
Correspondence

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San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

FEB 27 2008
CITY MANAGER'S OFFICE

MAR 07 2008
JT

February 26, 2008

Blair King
City of Lodi
Redevelopment Agency
221 W. Pine Street
Lodi, CA 95241

Subject: Comments on Proposed Project

Project: NOP: Lodi Community Improvement Plan

District Reference No: 20080075

Dear Ms. King:

The San Joaquin Valley Unified Air Pollution Control District (District) has reviewed the NOP for the Lodi Community Improvement Plan and offers the following comments:

District Comments

- 1) The District recommends that any preliminary and final environmental review of the project's potential impact on air quality include the following:
 - 1a) A description of the regulatory environment and existing air quality conditions impacting the area. Information on the District's attainment status can be found on the District's web page:
<http://valleyair.org/aqinfo/attainment.htm>
 - 1b) A description of the project, including a discussion of existing and post-project emissions. The discussion should include emissions from short-term activities such as construction, and emissions from long-term activities, such as operational, and area wide emission sources.

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061
www.valleyair.org


Southern Region
2700 M Street, Suite 275
Bakersfield, CA 93301-2373
Tel: (661) 326-6900 FAX: (661) 326-6985

- 1c) A discussion of the potential health impact of Toxic Air Contaminants (TACs), if any, to near-by receptors.
- 1d) A discussion of whether the project would result in a cumulatively considerable net increase of any criteria pollutant or precursor for which the San Joaquin Valley Air Basin is in non-attainment.
- 1e) A discussion of whether the project would create nuisance odors.
- 1f) A discussion of the methodology, model assumptions, inputs and results used in characterizing the project's impact on air quality.
- 1g) A discussion of all existing District regulations that apply to the project.
- 1h) A discussion of all feasible measures that will reduce air quality impacts.
- 2) At this time there are no established significance thresholds for greenhouse gas emissions, however, it is suggested that the EIR include a discussion of greenhouse gas emissions generated by the project and the effect they will have, if any, on global climate change.
- 3) Emissions from permitted (stationary sources) and non-permitted (mobile sources) sources should be analyzed separately. The project should be considered to have a significant adverse impact on air quality if emissions from either source exceed the following amounts: 10 tons per year of oxides of nitrogen (NOx), 10 tons per year of reactive organic gases (ROG), or 15 tons per year particulate matter of 10 microns or less in size (PM10).
- 4) If the project is located near residential/sensitive receptors, the proposed project should be evaluated to determine the health impact of Toxic Air Contaminants (TACs) to the near-by receptors. If the analysis indicates that TACs are a concern, the District recommends that a Health Risk Assessment (HRA) be performed. If a HRA is to be performed, it is recommended that the project proponent contact the District to review the proposed modeling approach. Please contact Mr. Leland Villalvazo, Supervising Air Quality Specialist, at hramodeler@valleyair.org. Additional information on Toxic Air Contaminants (TACs) can be found on the District's Air Quality Modeling page; http://www.valleyair.org/busind/pto/Tox_Resources/AirQualityMonitoring.htm
- 5) If an HRA is performed, all input and out put files necessary to validate the analysis should be submitted to the District in electronic format.
- 6) The proposed project may require District permits. Prior to construction, the project proponent should submit to the District an application for an Authority to Construct (ATC). For further information or assistance, the project proponent may contact the District's Small Business Assistance Office at (559) 230-5888.

District staff is available to meet with you and/or the applicant to further discuss the regulatory requirements that are associated with this project. If you have any questions or require further information, please call Jon Klassen at (559) 230-5843 and provide the reference number at the top of this letter.

Sincerely,

David Warner
Director of Permit Services



for: Arnaud Marjollet
Permit Services Manager

DW: jk

cc: File

MAR 04 2008
CITY MANAGER'S OFFICE



S J C O G , Inc.

555 East Weber Avenue • Stockton, CA 95202 • (209) 468-3913 • FAX (209) 468-1084

San Joaquin County Multi-Species Habitat Conservation & Open Space Plan (SJMSCP)

SJMSCP RESPONSE TO LEAD AGENCY ADVISORY AGENCY NOTICE TO SJCOG, Inc.

To: Mr. Blair King, City Manager, Redevelopment Agency of the City of Lodi
From: Anne-Marie Poggio-Castillou, SJCOG, Inc.
Date: February 29, 2008
Re: **Lead Agency Project Title:** Initial Study of Lodi Community Improvement Project
Lead Agency Project Number: N/A
Assessor Parcel Number(s): Multiple

Total Acres to be converted from Open Space Use: 2,400 acres

Habitat Types to be Disturbed: Urban Land, Multi-Purpose and Agriculture

Species Impact Findings: Findings to be determined by SJMSCP biologist.

Dear Mr. King:

SJCOG, Inc. has reviewed the application for the Initial Study of Lodi Community Improvement Project. This project consists of a Redevelopment Plan for approximately 2,400-acre area generally located east of Sacramento Street to the eastern boarder of the City of Lodi, with some areas extending west to Ham Lane.

The SJMSCP is requesting a revision under Section IV. Biological Resources. This sections states "*The Project Area is not within an open space preserve area identified in the SJMSCP. Rather, the Project Area is classified by the SJMSCP as Urban Lands.*" This is inaccurate statement. Portions of the site are considered Urban, however, the eastern portions of the project area include Multi-Purpose and Agricultural Land under the City of Lodi's compensation map.

The City of Lodi is a signatory to San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP). Participation in the SJMSCP satisfies requirements of both the state and federal endangered species acts, and ensures that the impacts are mitigated below a level of significance in compliance with the California Environmental Quality Act (CEQA). Although participation in the SJMSCP is voluntary, lead agents should be aware that if project applicants choose against participating in the SJMSCP, they will be required to provide alternative mitigation in an amount and kind equal to that provided in the SJMSCP.

This Project is subject to the SJMSCP. This can be up to a 30 day process and it is recommended that the project applicant contact SJMSCP staff as early as possible.

Please contact SJMSCP staff regarding completing the following steps to satisfy SJMSCP requirements:

- Schedule a SJMSCP Biologist to perform a pre-construction survey ***prior to any ground disturbance***
- Sign and Return Incidental Take Minimization Measures to SJMSCP staff (given to project applicant after pre-construction survey is completed)
- Pay appropriate fee based on SJMSCP findings
- Receive your Certificate of Payment and release the required permit

If you have any questions, please call (209) 468-3913.



The Canyon City — Gateway to the American Dream

Economic and Community Development
Phone Number (626) 812-5299 • Facsimile Number (626) 334-5464
E-Mail Address: bcoleman@ci.azusa.ca.us

VIA FACSIMILE (714) 234-1126
ORIGINAL VIA MAIL

March 4, 2008

Ernie Glover
GRC Redevelopment Consultants Inc.
701 S. Parker St. Suite 7400
Orange, CA 92868

Dear Mr. Glover:

Re: Redevelopment Agency of the City of Azusa Request for Proposal for Financial Advisory and Redevelopment Consulting Services

The Redevelopment Agency of the City of Azusa ("Agency") is seeking the services of an experienced financial advisory firm to assist in the structure and sale of tax allocation bonds and provide redevelopment consulting services on a ongoing basis to aid the City in the review of complex redevelopment proposals and provide as-needed staff support services. It is anticipated that the selected firm will assist the Agency in evaluating its strategy as it relates to the proposed debt issue, structuring the financing, preparing presentations for rating agencies/insurance providers and preparing and reviewing documents necessary for the sale of securities. The Agency is requesting that the financial advisory firm assist the Agency in selecting the financing team for this debt issue. In addition to the above described activities, the selected firm will be required to provide the Agency with the base level services and other general advisory services as may be requested from time to time.

Proposals are due by March 20, 2008, by 5:00 P.M. Should you have any questions, please feel free to contact me at (626) 812-5299, or e-mail me at bcoleman@ci.azusa.ca.us.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bruce A. Coleman'. The signature is written in a cursive style.

Bruce A. Coleman
Economic and Community Development Director

BAC:Rjj/cs
Attachments
C:\Documents and Settings\azususer1\Desktop\RFPLtr_Financial Advisory & RDA Consulting Svcs.doc

**CITY OF AZUSA
REDEVELOPMENT AGENCY**

**REQUEST FOR PROPOSALS FOR
FINANCIAL ADVISORY AND REDEVELOPMENT CONSULTING SERVICES
DUE: MARCH 20, 2008, 5:00 P.M.**

INTRODUCTION

The City of Azusa Redevelopment Agency (the "Agency") is requesting that qualified firms submit Proposals for the provision of 1) financial advisory services for the Agency's upcoming tax allocation bond financing; and 2) redevelopment consulting services on a ongoing basis to assist the Agency in the review of complex redevelopment proposals and provide as-needed staff support services.

The Agency plans to issue new money and/or refunding tax allocation bonds in mid-2008, to fund economic development in Downtown Azusa and other revitalization projects within the Agency's jurisdiction. The Agency seeks to contract with a qualified firm to serve as financial advisor for the upcoming issue. The financial advisor will help the Agency structure the new bond issue and create the financing team necessary for the upcoming issue, including bond counsel, disclosure counsel, fiscal consultant, and underwriter for the issue. The Agency plans to issue the bonds immediately following adoption of the new Redevelopment Plan Amendment which will increase the Agency tax increment cap from \$114.9 million to \$300 million.

BACKGROUND

City Background

The City of Azusa is located in Los Angeles County, approximately 25 miles northeast of Downtown Los Angeles. It was incorporated in 1898 as a general law city, and encompasses an area of approximately 9 square miles. The City operates according to the Council/Manager form of government. The City Manager is appointed by the City Council to manage the City's staff and to implement policies established by the City Council. The City is experiencing considerable growth and redevelopment. New development includes:

- Rosedale Master Planned Community: This project consists of 1,250 homes on the site of the former Monrovia Nursery. The project is under construction. These homes will range in value from \$630,000 to \$1.3 Million and will change the dynamic of the city. This development represents the largest urban infill project in eastern Los Angeles County.
- Foothill Center/Citrus Crossing: The Foothill Shopping Center, which was originally developed in the 1950's, is currently being redeveloped by a Century City shopping center developer to include a renovated Regency Theatre, Ross Store, and other retail anchors. The nearly 23 acre site will contain 186,500 square feet of retail development

including restaurants and 102 new townhouses being developed by Watt Communities. The property is adjacent to Azusa Pacific University.

- Urban Infill Housing: In addition to the 102 townhouses at the Foothill Center, approximately 125 new townhouses are being developed at this time on various sites in the city, including West Foothill Boulevard and on South Azusa Avenue.
- Azusa Pacific University: APU, a 6,000-student private university founded in 1899, is about to experience strong growth. Consistently ranked in the Top 25 Universities in the Western United States by US News and World Reports, the Azusa City Council has recently approved the Azusa Pacific University Specific Plan for its east and west campuses. The new APU Science Center at the corner of Foothill and Alosta is currently under construction.

Redevelopment Agency Background

The five members of the City Council serve as members of the governing board of the Agency. The elected Mayor is also Chairman of the Agency. The City Manager serves as the Executive Director.

The redevelopment plan for the Central Business District Project ("CBD") was adopted on September 18, 1978. The CBD has been amended thirteen times. The West End Project ("WED") was adopted on November 28, 1983, and has been amended eight times. The CBD and WED were merged (the "Merged Project") on November 7, 1988. The overall objective of the redevelopment plan is to eliminate blighted conditions in the Project Area by undertaking all appropriate projects pursuant to the Redevelopment Law, by encouraging investment by the private sector and upgrading the quality of the community. The Agency has been actively promoting economic development activities within the Project Area. These projects include, in part:

- Downtown North: The Agency is presently working toward a strategic development plan and phased development program for this area, which is generally bounded by 9th Street on the north, Foothill Boulevard on the south, San Gabriel Avenue on the west and Dalton Avenue on the east. These projects under discussion include the future Downtown Transit District adjoining the proposed Metro Gold Line light rail station and construction of retail, mixed use, residential and a proposed future public library/senior center.
- Target Store: The Agency acquired one large and two smaller properties bounded by Azusa Avenue, 9th Street, San Gabriel Avenue and the Metro Gold Line light rail right-of-way and entered into settlement agreements with all tenants. Target Stores is proposing to develop an urban Target Department Store on the site. The Redevelopment Agency and Target have entered into a letter of intent detailing approved deal points for the proposed project and Target's development application is currently being reviewed. Negotiation of a Disposition and Development Agreement with Target is ongoing and the CEQA process is well underway.

- NEC Arrow Highway and Azusa Avenue: The Agency is negotiating with a developer to redevelop this severely blighted 3.56 acre site with commercial/retail uses.

The Agency recently issued \$15,780,000 in Taxable Tax Allocation Bonds (2007 Series A) and \$4,790,000 in Tax Allocation Refunding Bonds (2007 Series B). A copy of the Official Statement is available upon request from Roseanna Jara, Senior Accountant-Redevelopment, Azusa Redevelopment Agency, (626) 812-5102, e-mail rjara@ci.azusa.ca.us. The Official Statement provides a detailed description of the Agency's history and financial condition. In addition, the Agency's Annual Report is also available upon request.

The City Council has recently initiated the 2008 Redevelopment Plan Amendment which would add 15.1 acres to the Merged Project Area and increase the Agency's tax increment cap. Currently the Redevelopment Plan limits the overall net property tax revenues the Agency can collect to \$114.9 Million. This limit will be reached in a few years and once reached, will prevent the Agency from receiving a share of the property tax revenue generated in the Merged Project to fund additional redevelopment activities. Most of the documents necessary to complete the Plan Amendment have been prepared and it is anticipated that the Plan Amendment process will be completed by June 2008. The Agency wishes to initiate the tax allocation bond process prior to that time so that bonds can be issued immediately following the completion of the Plan Amendment process.

FINANCIAL AND REDEVELOPMENT ADVISORY SERVICES REQUESTED

The Agency is seeking the services of an experienced financial advisory firm to assist in the structure and sale of tax allocation bonds and redevelopment consulting services on a ongoing basis to assist the City in the review of complex redevelopment proposals and provide as-needed staff support services. It is anticipated that the selected firm will assist the Agency in evaluating its strategy as it relates to the proposed debt issue, structuring the financing, preparing presentations for rating agencies/insurance providers and preparing and reviewing documents necessary for the sale of securities. The Agency is requesting that the financial advisory firm assist the Agency in selecting the financing team for this debt issue. In addition to the above described activities, the selected firm will be required to provide the Agency with the following base level services and other general advisory services as may be requested from time to time, including:

Financial Advisory Services - Bonds

- A. The Consultant agrees to assist the Client in developing a Plan of Finance for the issuance of tax allocation bonds. The Plan of Finance will include an analysis of the current and projected tax revenues. The Consultant will assist the Client in reviewing the Agency's existing tax allocation bonds, OPA's, DDA's and other debt and prepare a Plan of Finance taking into account the Agency's financing objectives.
- B. Assist the Agency in the selection of professionals as necessary, to complete the Plan of Finance including underwriter, bond counsel and disclosure counsel if requested.

- C. Financial Consultant agrees to assist the Client and, in the case of a negotiated sale of bonds, the selected managing underwriter in the coordination and management of the implementation of the Plan of Finance and the financing process. This will include attending meetings as necessary and the completion of analyses and reports.
- D. Make necessary presentations to the staff, Agency Board, and Council in the review and approval of the financing.
- E. Work cooperatively with the other consultants to ensure that the Agency's financial goals are accomplished in a timely manner.
- F. Review and comment on all financing documents and make recommendations regarding structure, covenants, terms, and other conditions necessary to ensure marketability of the Bonds and to assure the Agency's financing objectives are achieved. The Consultant will also review and make recommendations related to the Agency's Continuing Disclosure obligation.
- G. Recommend the establishment of funds and accounts and provisions for investment of funds.
- H. The Financial Consultant agrees to assist the Client's Disclosure Counsel in the preparation and distribution of an Official Statement, which will form the basis of the Bond offering and which will contain comprehensive information with respect to the Bonds, the Client, the project, the legal documents and other pertinent information.
- I. Assist in the preparation of presentations to Moody's Investors Service and Standard and Poor's Corporation, if applicable, to obtain ratings for bonds. Assist in the negotiations of the terms and conditions required by those ratings agencies and discuss the impacts on future financings with Agency staff.
- J. Assist in the preparation of presentations to municipal bond insurers, if applicable, for possible credit enhancement for the bonds. Assist the Agency in evaluating various insurance bid proposals and covenants. Assist in the negotiations of the terms and conditions required by those insurers.
- K. The Consultant will review the marketing plan proposed by the underwriter, in the case of a negotiated sale, including marketing to retail investors, formation of a selling group, timing of the Agency's bond sale and other bond issues the underwriter may be involved in at the time of the sale.
- L. The consultant will review with the Agency the bond pricing proposed by the underwriter, in the case of a negotiated sale, including call features, selling bonds at premiums or discounts, the use of serial and one or more term bonds and the cost or benefits to the Agency.
- M. In the case of a negotiated sale, the Consultant will provide accurate and timely information to the Client on market conditions on the day of pricing. The Consultant will review the results of the underwriters' sales effort and assist the Client in negotiating the

terms of the Bond Purchase Agreement.

- N. Consultant will review the Clients options with regard to defeasance securities and recommend the timing and method of acquisition and expected savings target in the event any existing bonds are refunded.
- O. The consultant will review and comment on the final legal documents and review and comment on the final official statement.
- P. The Consultant will coordinate the closing of the transaction including the signing of documents, the receipt of the sales proceeds for the bonds, the payment of the bond insurance premium, the payment of cost of issuance and depositing the moneys in the various funds and accounts with the trustee.
- Q. The consultant will assist the Agency with the investment of the Debt Service Reserve and the other Funds.
- R. The Consultant will provide the Client with a final distribution list, bond record, which shall include details regarding the Bonds and their sale, a final debt service schedule, (2) complete bond binders, and a list of the bond CUSIP numbers.
- S. The Consultant will be available after the bond closing to answer any questions of Agency staff regarding the results of the bond underwriting.
- T. Preparation of fiscal reports related to tax increment revenues and tax allocation bonds.

Redevelopment Consulting Services

- A. Preparation and analysis of pro formas to analyze and review development proposals and project viability.
- B. Preparation of documents necessary to assist the Agency in meeting reporting and California Redevelopment Law requirements, including 33433 reports.
- C. Assistance with negotiation and acquisition of real property.
- D. Assistance with developer selection and negotiation of Disposition and Development agreements.
- E. Development of various financing alternatives using low and moderate income housing set aside funds, tax allocation bonds, and other revenue sources so as to leverage funds for redevelopment projects.
- F. Tax increment revenue projections.
- G. Other redevelopment advisory services as needed and authorized.

PROPOSALS

In responding to this RFP, please provide the following information:

1. Description of your firm, including years of operation, location of California offices, and number of professional and support staff. Describe all of the lines of business in which your firm engages.
2. Assigned staff who would work with the Agency on a day-to-day basis. Provide resume for each.
3. Description of your firm's experience with redevelopment agencies and tax increment financings. Summarize the redevelopment financings and other redevelopment advisory services that your firm has worked on during the last 3 years. Provide a full list of these redevelopment transactions, including issuer, par amount and your role on the transactions where your firm acted as a financial advisor.
4. The Agency hopes to close on the bond issues before September 30, 2008, following completion of the current Redevelopment Plan Amendment (see attached Plan Amendment Schedule). Please provide a description of your experience overseeing financings that are affected by amendments to redevelopment plans. Please provide a schedule which indicates the actions you will take prior to the completion of the Plan Amendment so that the Agency may issue the bonds immediately following approval of the Plan Amendment. Discuss any potential issues relating to the issuance of the bonds as it relates to the Plan Amendment process.
5. Discuss your firm's capabilities in modeling redevelopment revenue streams and determining revenues available for bonding.
6. The Agency proposes to pursue a negotiated issue for the upcoming financing. Describe the scope of work that you will perform for a proposed negotiated redevelopment financing. Please describe your firm's experience in both a negotiated and competitive redevelopment financing.
7. Describe your proposal for assisting the Agency to select the financing team.
8. Describe the cost for your bond financial advisory services and how they will be funded, e.g., from bond proceeds. Costs provided should detail tasks, hours by task, and individuals who will undertake each task.
9. Describe your fee proposal for providing other redevelopment consulting services.

Five copies of your Proposal are due to the Redevelopment Agency of the City of Azusa, 213 E. Foothill Blvd., Azusa, CA 91702-1395, by March 20, 2008 at 5:00 PM, Pacific Time. You may also e-mail a copy of your Proposal to Roseanna Jara at rjara@ci.azusa.ca.us and follow-up with

your five copies via mail. Should you have any questions regarding this RFP, please contact Bruce A. Coleman, Economic and Community Development Director at (626) 812-5299 or e-mail at bc Coleman@ci.azusa.ca.us.

The City of Azusa reserves the right to reject any or all proposals for any reason whatsoever. Interviews will be at the option of the City. The lowest cost proposal will not necessarily be selected. The services to be provided shall be in accordance with the standard City of Azusa Professional Services Agreement and which will be approved by the Agency Board.

BAC:RJJ/cs

Attachment:
Plan Amendment Schedule

**Redevelopment Agency of the City of Azusa
Plan Amendment to the Merged Central Business District & West End Project
Amendment to add territory to Central Business, re-instate eminent domain on 2 commercial properties in
the West End and increase the tax increment cap (H.S.C. 33354.6)**

City Council/Agency Meetings - 1st and 3rd Mondays
Planning Commission Meetings - 2nd and 4th Wednesdays

Responsible Party	Action Item	Action Date or Meeting Date	Document(s)	Document(s) Due Date
Tierra West	Tierra West - considers approval of the Staff Report and Resolution establishing a survey area for study purposes.	January 7, 2008	City Council Staff Reports and Resolutions	January 1, 2008
Tierra West	Planning Commission considers approving the Preliminary Plan and submits the Preliminary Plan to the Redevelopment Agency (H.S.C. 33322 through 33325).	January 30, 2008	Preliminary Plan, Commission & Agency Staff Reports and Resolutions	January 9, 2008
Tierra West	Tierra West and Staff - Letter prepared informing taxing entities of revised schedule for Plan Amendment and coordinate conference call with L.A. County Supervisor Gloria Molina's staff and Robert Moran.	January 31, 2008		
Tierra West	Tierra West - Redevelopment Agency considers approving the Preliminary Plan and directs staff to transmit the Statement of Preparation of the proposed amendment of the Project Area (H.S.C. 33323, 33327, and 33328).	February 19, 2008	Agency Staff Report and Resolution	January 31, 2008
Tierra West	Tierra West - Redevelopment Agency and City Council considers approving a resolution finding that no Project Area Committee is necessary for the amendment. (H.S.C. 33385)	February 19, 2008	Agency and City Council Staff Reports and Resolutions	January 21, 2008
GRC	GRC - transmits the Initial Study and NOP to State Clearinghouse and all responsible agencies and taxing agencies - 30-day NOP review period begins.	February 22, 2008	Initial Study and Notice of Preparation	February 14, 2008
Tierra West	Tierra West - mails statement of preparation with a copy of the Project Area Map and Legal Metes and Bounds Description to affected taxing entities (via certified mail, return receipt requested) and State Board of Equalization (via overnight mail).	February 21, 2008	List of Affected Taxing Entities, Preliminary Plan and Statement of Preparation	February 14, 2008
Tierra West	Tierra West - mails the Department of Finance/County of Los Angeles letter pursuant to H.S.C. 33328.1(b) to the affected school districts for their comments.	March 3, 2008	School and Population projections	February 25, 2008
Tierra West	Tierra West - Agency considers approval of the Preliminary Report and Redevelopment Plan	March 3, 2008	Preliminary Report, Redevelopment Plan, Agency staff report and Resolutions	February 21, 2008
Tierra West	Tierra West - transmits Preliminary Report (H.S.C. 33344.5), and Draft Redevelopment Plan (H.S.C. 33333.3) to affected taxing entities (certified mail, return receipt requested), to the Planning Commission, and to other interested parties (H.S.C. 33352(n)(1)). Must be sent no later than 90 days prior to Joint Public Hearing (H.S.C. 33344.6).	March 4, 2008	Transmittal Letter	February 25, 2008
Tierra West	Tierra West - mails the Department of Finance/County of Los Angeles letter pursuant to H.S.C. 33328.1(b) to the Dept. of Finance.	March 18, 2008	School and Population projections	March 11, 2008
	GRC - 30-day NOP review period ends.	March 23, 2008		
GRC	GRC - submits Draft EIR with Notice of Availability (NOA) and Notice of Completion (NOC) to State Clearinghouse, responsible agencies, taxing agencies and file with County Clerk - 45-day public review period begins.	April 4, 2008	NOA and NOC	March 28, 2008
Tierra West	GRC - Redevelopment Agency determines adequacy of Draft EIR and approves it for circulation.	April 7, 2008	Draft EIR, Agency Staff Report and Resolution	March 17, 2008
Tierra West	Tierra West - City Council and Redevelopment Agency set Joint Public Hearing for June 2, 2008.	April 7, 2008	City Council and Agency Staff Reports and Resolutions	March 17, 2008
Tierra West	Tierra West - mails the Department of Finance/County of Los Angeles notice and report (45 days prior to JPH First Reading). Notice sent to State Department of Finance and Department of Housing and Community Development. Notice includes date and time of joint public hearing and copy of Report pursuant to H.S.C. 33451.5.	April 8, 2008	School report and Notice	March 27, 2008

**Redevelopment Agency of the City of Azusa
Plan Amendment to the Merged Central Business District & West End Project
Amendment to add territory to Central Business, re-instate eminent domain on 2 commercial properties in
the West End and increase the tax increment cap (H.S.C. 33354.6)**

City Council/Agency Meetings - 1st and 3rd Mondays
Planning Commission Meetings - 2nd and 4th Wednesdays

Responsible Party	Action Item	Action Date or Meeting Date	Document(s)	Document(s) Due Date
Tierra West	Tierra West - Draft Report to City Council available for public review	April 22, 2008	Report to Council	April 7, 2008
Tierra West	Tierra West - mails notice of the Joint Public Hearing and Community Information Meeting via first class mail to residents and businesses (to printer/mail center by April 23rd) within the Project Area and via certified mail to all affected taxing entities by May 1st.	April 23, 2008	Notice for Meeting	April 14, 2008
Tierra West and Staff	Tierra West and Staff - Publish Notice of the Joint Public Hearing for four (4) consecutive weeks in the Azusa Herald or other paper of general circulation (H.S.C. 33349, 33361 and 33452) for June 2nd Joint Public Hearing. May 1st, 8th, 15th and 22nd.	April 23, 2008	Notice for submission to Azusa Herald	April 16, 2008
Tierra West and Legal Counsel	Tierra West and Legal Counsel - Tierra West prepares binders for the City Council and Redevelopment Agency Joint Public Hearing on the Redevelopment Plan and Draft EIR. Legal Counsel prepares the written statements that the Agency/City Council members file regarding direct and indirect financial interest in property within the Project Area. Statements will be included in the minutes of the Agency and the City Council.	May 5, 2008	Plan Amendment Binders	April 28, 2008
	GRC - 45-day Draft EIR public review period ends.	May 22, 2008		
	GRC - Comments on EIR 10 days prior to Joint Public Hearing	May 23, 2008		
Tierra West	Tierra West - conducts the Community Information Meeting (Redevelopment 101 Seminar & Plan Amendment Presentation)	May 24, 2008	PowerPoint Presentation and handouts	May 1, 2008
GRC	GRC - Planning Commission considers conformance of Redevelopment Plan (H.S.C. 33346) and Draft EIR and submits report and recommendations. Public review on the Draft EIR at Planning Commission meeting.	May 28, 2008	Draft EIR and staff report, no resolution required.	April 30, 2008
GRC	GRC - Submittal of response letters to commenting agencies on the Draft EIR.	May 29, 2008		
Tierra West	Tierra West - End 90-day review period for Preliminary Report	June 1, 2008	Preliminary Report	
IF NO WRITTEN OBJECTIONS ARE SUBMITTED				
Tierra West	Tierra West - Agency considers approval of the resolution for the Report to the City Council, Owner Participation Rules and Method of Relocation and authorize transmittal of said documents to the City Council.	June 2, 2008	Agency Resolution and Staff Report	May 19, 2008
Legal Counsel	Legal Counsel - provides ordinance for City Council to give first reading of the ordinance approving and adopting the Redevelopment Plan and EIR. (H.S.C. 33364 and 33365).	June 2, 2008	Ordinance	May 19, 2008
City Council	City Council - gives second reading of ordinance adopting the Redevelopment Plan.	June 16, 2008		
GRC	GRC - Notice of Determination (NOD) no effect form and Fee Exemption filed with State Clearinghouse and the County	June 18, 2008		
Tierra West and Staff	Tierra West and Staff - prepare and record a document describing the Redevelopment Plan with the County Recorder (hand delivered) (H.S.C. 33373).	June 19, 2008		
Tierra West	Tierra West - transmits (via certified mail, return receipt requested) copies of the ordinance, recorded documents, and Project Area map to the governing bodies of all affected taxing entities, the County Assessor, County Auditor-Controller, and the State Board of Equalization (H.S.C. 33375).	June 19, 2008		
	EIR Challenge Period Expires. (30 days after Notice of Determination has been filed.)	July 18, 2008		

**Redevelopment Agency of the City of Azusa
Plan Amendment to the Merged Central Business District & West End Project
Amendment to add territory to Central Business, re-instate eminent domain on 2 commercial properties in
the West End and increase the tax increment cap (H.S.C. 33354.6)**

City Council/Agency Meetings - 1st and 3rd Mondays
Planning Commission Meetings - 2nd and 4th Wednesdays

Responsible Party	Action Item	Action Date or Meeting Date	Document(s)	Document(s) Due Date
	Ordinance Effective: Plan Challenge Period - Period for filing challenges to the ordinance expires [90 days after adoption of ordinance (second reading)]. (H.S.C. 33500)	September 18, 2008		
IF WRITTEN OBJECTIONS ARE SUBMITTED				
Tierra West, Staff, and Legal Counsel	Tierra West, Staff, and Legal Counsel - provide written responses to written objections as presented at the joint public hearing (H.S.C. 33363).	June 16, 2008	Agency Resolution and Staff Report	June 2, 2008
Redevelopment Agency	Redevelopment Agency - considers adopting a resolution approving written responses to the objections.	June 16, 2008		
City Council	City Council - City Council considers approving written responses to written objections and gives first reading of the ordinance approving and adopting the Redevelopment Plan. (H.S.C. 33364 and 33365).	June 16, 2008		
City Council	City Council - Second reading of ordinance adopting the Redevelopment Plan.	July 8, 2008		
GRC	GRC - Notice of Determination (NOD) no effect form and Fee Exemption filed with State Clearinghouse and the County	July 10, 2008		
Tierra West and Staff	Tierra West and Staff - prepare and record a document describing the Redevelopment Plan with the County Recorder (hand delivered) (H.S.C. 33373).	July 10, 2008		
Tierra West	Tierra West - transmits (via certified mail, return receipt requested) copies of the ordinance, recorded documents, and Project Area map to the governing bodies of all affected taxing entities, the County Assessor, County Auditor-Controller, and the State Board of Equalization (H.S.C. 33375).	July 10, 2008		
	EIR Challenge Period Expires. (30 days after Notice of Determination has been filed.)	August 8, 2008		
	Ordinance Effective: Plan Challenge Period - Period for filing challenges to the ordinance expires [90 days after adoption of ordinance (second reading)]. (H.S.C. 33500)	October 5, 2008		

Mar. 7. 2008 12:32PM

No. 0331 P. 2

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION

P.O. BOX 2048 STOCKTON, CA 95201
(1976 E. CHARTER WAY/1976 E. DR. MARTIN
LUTHER KING JR. BLVD. 95205)
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March 7, 2008

**10-SJ-Various
SCH#2008022053 (NOP)
Lodi Community
Improvement Project**

Blair King
City of Lodi
Planning Division
221 West Pine Street
Lodi, CA 95241-1910

Dear Mr. King:

The California Department of Transportation (Department) appreciates the opportunity to have reviewed the Notice of Preparation (NOP) application for the proposed Lodi Community Improvement Project. The project is a Redevelopment Plan for approximately 2,400-acre area generally located east of Sacramento Street to the eastern border of the City, with some areas extending west to Ham Lane. The Department has the following comment(s):

The Environmental Impact Report (EIR) for the General Plan was done on a programmatic level and generally identified capital improvement projects (CIP) contained in the circulation element of the General Plan. The Draft Environmental Impact Report (DEIR) for the Redevelopment Plan should tier off of the program level and provide specific assessments of transportation needs for this area along with the general cost estimates and funding responsibilities.

The Department concurs with the statement on page 2, of the "Initial Study for the Lodi Community Improvement Project", that states "Because future development within the Project Area must occur within the established parameters of the prevailing General Plan, implementation of the Redevelopment Plan will not result in any unanticipated development or densities within the Project Area."

TRAFFIC OPERATIONS

A traffic impact study (TIS) is necessary to determine this project's near-term and long-term impacts to State facilities – both existing and proposed – and to propose appropriate mitigation measures. The department recommends that the study be prepared in accordance with the

"Caltrans improves mobility across California"

Mar. 7. 2008 12:52PM

No. 0331 P. 3

Mr. King
March 7, 2008
Page 2

Caltrans Guide for the Preparation of Traffic Impact Studies, dated December 2002 (Guide). The TIS should include all approved and pending projects within the vicinity.

The Department recommends that the City encourage the developer to submit a scope of work for conducting the TIS prior to circulating the local development application for comment in order to expedite the Department's review. The Department is available to discuss assumptions, data requirements, study scenarios, and analysis methodologies prior to beginning the TIS. This will help insure that a quality TIS is prepared.

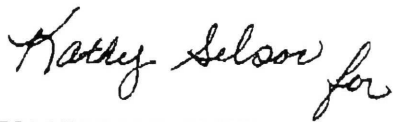
An Encroachment Permit will be required for work (if any) done within the Department's right of way. This work is subject to the California Environmental Quality Act (CEQA). Therefore, environmental studies may be required as part of the encroachment permits application. A qualified professional must conduct any such studies undertaken to satisfy the Department's environmental review responsibilities. Ground disturbing activities to the site prior to completion and/or approval of required environmental documents may affect the Department's ability to issue a permit for the project. Furthermore, if engineering plans or drawings will be part of your permit application, they should be prepared in standard units.

ENVIRONMENTAL

The Department has the responsibility for the maintenance and operation of State and Interstate highways within California. Any proposal that would affect that, or environmental resources within the existing highway right-of-way, is of concern to the Department. The proposed project will impact state facilities, State Route 12 (SR 12) and State Route 99 (SR 99). The proponent will need to submit a complete encroachment permit application with Caltrans in order to make any improvements to Caltrans facilities. A copy of the Environmental Impact Report (EIR) to be completed by the proponent should be sent to Caltrans for Environmental review and comments. Caltrans District 10 will focus on the impacts the proposal will have on the operations of SR 12 and SR 99 and environmental resources within existing highway right-of-way.

If you have any questions or would like to discuss our comments in more detail, please contact Kathy Selsor at (209) 948-7190 (e-mail: kathy_selsor@dot.ca.gov) or me at (209) 941-1921.

Sincerely,



TOM DUMAS, CHIEF
OFFICE OF METROPOLITAN PLANNING

c: SMorgan State Clearinghouse

Mar. 7. 2008 12:52PM

No. 0331 P. 4

Mr. King
March 7, 2008
Page 3

bc: TDumas
M Omar Traf Ops



THOMAS R. FLINN
DIRECTOR



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DEPUTY DIRECTOR

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DEPUTY DIRECTOR

ROGER JANES
BUSINESS ADMINISTRATOR

MAR 12 2008
CITY MANAGER'S OFFICE

March 10, 2008

Blair King, City Manager
City of Lodi
221 West Pine Street
Lodi, California 95241-1910

SUBJECT: NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT
LODI COMMUNITY IMPROVEMENT PROJECT

Dear Mr. King:

The San Joaquin County Department of Public Works has reviewed the above referenced document and our concerns, recommendations, and corrections are as follows:

Public Services:

1. All improvements within San Joaquin County right-of-way shall be in conformance with the current Improvement Standards and Specifications of the County of San Joaquin.
2. An Encroachment Permit shall be required for work within the San Joaquin County road right-of-way.

Thank you for the opportunity to be heard. Should you have questions or need additional information regarding the above comments, please contact me at 468-3085.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Hopkins".

MARK HOPKINS
Environmental Coordinator

MH:rc
TP-8C027-R1

c: Thomas M. Gau, Chief Deputy Director
Michael Chung, Senior Civil Engineer
Michael C. Selling, Senior Civil Engineer
Sejal Sharma, Engineer III