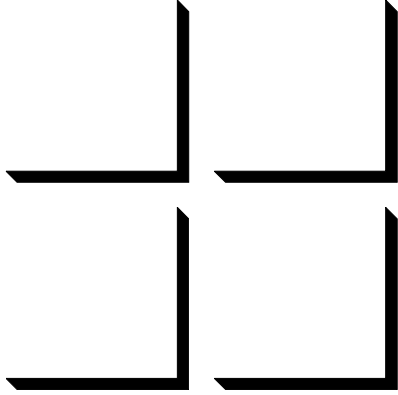


May 15, 2008

DRAFT
**Report to City Council for
the Lodi Community
Improvement Project**

REDEVELOPMENT AGENCY OF THE CITY OF LODI



Report to City Council for the Lodi Community Improvement Project

REDEVELOPMENT AGENCY OF THE CITY OF LODI

 **FRASER & ASSOCIATES**

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

Report to City Council for the Lodi Community Improvement Project

CITY COUNCIL/ REDEVELOPMENT AGENCY

JoAnne Mounce, *Mayor/Chair*
Larry D. Hansen, *Mayor Pro Tem/Vice Chair*
Susan Hitchcock, *Councilperson/Member*
Bob Johnson, *Councilperson/Member*
Phil Katzakian, *Councilperson/Member*

PLANNING COMMISSION

Tim Mattheis, *Chair*
Wendel Kiser, *Vice-Chair*
Steve Hennecke, *Commissioner*
Dave Kirsten, *Commissioner*
Denis White, *Commissioner*
Bill Cummins, *Commissioner*
Debbie Olson, *Commissioner*

CITY/AGENCY STAFF

Blair King, *City Manager/Executive Director*
Randy Hatch, *Community Development Director*
Peter Pirnejad, *Planning Manager*
Mark Huebsch, *Agency Special Counsel*
Stephen Schwabauer, *City Attorney*
Kirk Evans, *Budget Manager*
Immanuel Bereket, *Junior Planner*
Rick Caguiat, *Junior Planner*
David Morimoto, *Senior Planner*

Report to City Council for the Lodi Community Improvement Project

TABLE OF CONTENTS

Executive Summary	v
1.0 Introduction	1
2.0 Requirements and Definitions	9
3.0 Reasons for the Selection of the Proposed Project Area	13
4.0 Description of the Specific Projects Proposed by the Agency and Description of How these Projects will Improve or Alleviate Blight.....	15
5.0 Urbanization in the Proposed Project Area.....	17
6.0 Existing and Planned Land Uses in the Proposed Project Area.....	19
7.0 Socio-Economic Profile	23
8.0 Physical and Economic Conditions in the Proposed Project Area	25
9.0 Summary of Existing Conditions in the Proposed Project Area.....	101
10.0 Properties Necessary for Effective Redevelopment.....	107
11.0 The “Five-Part Test”	104
12.0 Why Blight cannot be Eliminated without Redevelopment or Tax Increment Financing	113
13.0 Proposed Method of Financing and Feasibility of the Project	123
14.0 Implementation Plan.....	135
15.0 Analysis of the Preliminary Plan.....	153
16.0 Report and Recommendation of the Planning Commission.....	157
17.0 Summary of Information from Section 33387.....	157

18.0	Report Required by Section 65402 of the Government Code	213
19.0	Report Required by Section 21151 of the Public Resources Code (The Program Environmental Impact Report).....	217
20.0	Report of the County Fiscal Officer & Section 33328.5 Supplemental Report.....	221
21.0	Neighborhood Impact Report	223
22.0	33328 Report Analysis and Summary of Consultations with Taxing Agencies	231
23.0	Relocation Method	235

APPENDICES:

- Tab A:* GRC Redevelopment Consultants Staff
- Tab B:* Project Area Parcel List
- Tab C:* Redevelopment Plan
- Tab D:* Environmental Impact Report
- Tab E:* Relocation Method

LIST OF FIGURES

1.	Proposed Project Area	8
2.	Urbanization	18
3.	Existing Land Use	21
4.	General Plan Land Use	22
5.	Building Age	29
5.	CRL Selection 33031 (A)(1)	112
6.	CRL Selection 33031 (A)(2)	113
7.	CRL Selection 33031 (A)(3)	114
8.	CRL Selection 33031 (A)(4)	115
9.	CRL Selection 33031 (B)(1)	116
10.	CRL Selection 33031 (B)(2)	117
6.	Blight Summary Map	104
7.	Economic Blight Summary Map	105

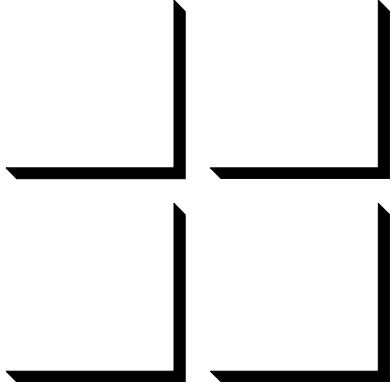
LIST OF TABLES

1.	Urbanization	17
2.	Existing Land Use	19
3.	Plan Land Use	20
4.	Value Per Acre for Properties that are Dilapidated	32
5.	Value per Acre for Obsolete Commercial and Industrial Properties	36
6.	Assessed Value per Acre for Absentee-owned Single-Family Residential Property	38
7.	Value per Acre for Incompatible and Non-Conforming Uses	68
8.	Average Per Square Foot Single Family Sales Value 1998-2007	81
9.	Property Re-Investment Trends	82
10.	City-Wide and Project Area Crime Rate Comparison 2003-2005	99
11.	Tax Share payments.....	126
12.	Project and Programs	129
13.	Tax Increment Projection	130
14.	New Development Assumption.....	131
15.	Estimated Bonded Indebtedness Limit	132
16.	Financial Feasibility Analysis	133

GRC] GRC] GRC]

This page intentionally left blank

GRC] GRC] GRC]



EXECUTIVE SUMMARY

The Redevelopment Agency of the City of Lodi is in the process of considering the adoption of a redevelopment plan for portions of east Lodi. The Lodi City Council began the process by adopting Survey Area boundaries and then the Lodi Planning Commission selected proposed Project Area boundaries.

California Community Redevelopment Law requires that a final report, this Report to the City Council, include discussions of existing conditions in the Project Area, proposed projects and programs, financing, and a variety of additional matters related to the proposed Redevelopment Plan.

A review of the properties was conducted to identify if, and where, blight exists in the Project Area. The results show that significant blight exists throughout the Project Area.

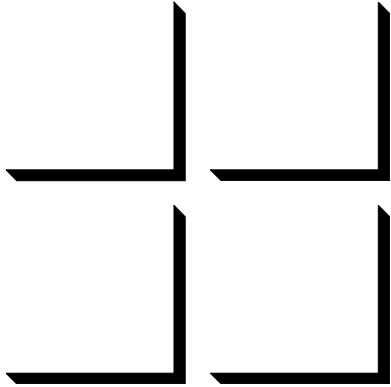
Improvement projects and programs aimed at eliminating the blight include targeted economic development programs, neighborhood improvement programs, public infrastructure funding focused on the commercial corridors of the Project Area, housing programs, and other redevelopment activities. These actions will eliminate blight through the rehabilitation of existing structures, the development of new structures, and the provision of adequate infrastructure.

The Community Improvement Plan does not include the power of eminent domain, and the Agency will not have the ability to acquire property by use of eminent domain.

The Report shows that tax increment revenues are needed to bridge the gap between other sources and the cost for improvements. Although tax increment revenues will be the primary method of financing improvements, other forms of funding

will be used in concert to redevelop the Project Area. Financial projections show that the proposed Redevelopment Plan is feasible.

The purpose of this Report is to provide information about the proposed Redevelopment Plan to the City Council. In essence, this Report is a compilation of all materials prepared to date for the proposed adoption.



1.0 INTRODUCTION

1.1 BACKGROUND

The City of Lodi (the “City”) 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 California Community Redevelopment Law (Health and Safety Code Section 33000 et seq. (the “CRL”) may be the best way to address these problems, because it can provide the financial resources necessary in order to address the problems affecting the area without raising taxes or imposing new fees. With this in mind, the Redevelopment Agency of the City of Lodi (the “Agency”) has begun the process to complete the adoption of a redevelopment project area in east Lodi.

On November 7, 2007, the Lodi City Council (the “City Council”) designated a survey area for the Lodi Community Improvement Project. On November 14, 2007, the Lodi Planning Commission adopted proposed Project Area boundaries from within the survey area. The proposed Project Area includes approximately 2,000 acres per Figure 1.

1.2 PURPOSE OF THIS PROJECT

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 (the “Project”) is to provide a financial and administrative mechanism to alleviate blight and improve physical and economic conditions in the Proposed Project Area.

1.3 PURPOSE AND REQUIREMENTS OF THIS REPORT

This Report to the City Council has been prepared by the Agency pursuant to the CRL Section 33352, which requires the following information:

- a) The reasons for the selection of the Project Area, a description of the specific projects proposed by the Agency, and a description of how these projects will improve or alleviate the conditions described in subdivision “b” (below).
- b) A description of the physical and economic conditions specified in CRL Section 33031 that exist in the area that cause the Project Area to be blighted. The description shall include a list of the physical and economic conditions described in Section 33031 that exist within the Project Area and a map showing where in the Project Area the conditions exist. The description shall contain specific, quantifiable evidence that documents both of the following:
 - 1) The physical and economic conditions specified in Section 33031
 - 2) That the described physical and economic conditions are so prevalent and substantial that, collectively, they seriously harm the entire Project Area
- c) An implementation plan for the Project Area that describes specific goals and objectives of the Agency, specific projects then proposed by the Agency, including a program of actions and expenditures proposed to be made within the first five years of the Redevelopment Plan for the Project Area, and a description of how these projects will improve or alleviate the conditions described in CRL Section 33031.
- d) An explanation of why the elimination of blight and the redevelopment of the Project Area cannot reasonably be expected to be accomplished by private enterprise acting alone or by the Agency’s use of financing alternatives other than tax increment financing.
- e) The proposed method of financing the redevelopment of the Project Area in sufficient detail so that the City Council may determine the economic feasibility of the Redevelopment Plan.

- f) A method or plan for the relocation of families and persons to be temporarily or permanently displaced from housing facilities in the Project Area, which method or plan shall include the provision required by Section 33411.1 that no person or families of low- and moderate-income shall be displaced unless and until there is a suitable housing unit available and ready for occupancy by the displaced person for family at rents comparable to those at the time of their displacement.
- g) An analysis of the Preliminary Plan.
- h) The report and recommendations of the Planning Commission.
- i) The summary referred to in Section 33387, which is the record of proceedings of the Project Area Committee (if applicable).
- j) The report required by Section 65402 of the Government Code, which requires the Planning Commission to make a finding of General Plan conformance.
- k) The report required by Section 21151 of the Public Resources Code, which is the Environmental Impact Report.
- l) The report of the County Fiscal Officer as required by Section 33328 of the CRL.
- m) If the Project Area contains low- or moderate-income housing, a Neighborhood Impact Report which describes the impact of the Plan upon the residents of the Project Area and the surrounding areas, in terms of relocation, traffic circulation, environmental quality, availability of community facilities and services, effect on school population and quality of education, property assessments and taxes and other matters affecting the physical and social quality of the neighborhood. The Neighborhood Impact Report shall also include:
 - The number of dwelling units housing persons and families of low- or moderate-income expected to be destroyed or removed from the low- and moderate-income housing market as part of a redevelopment project.
 - The number of persons and families of low- or moderate-income expected to be displaced by the project.
 - The general location of housing to be rehabilitated developed or constructed for replacement housing.

- The number of dwelling units housing persons and families of low- or moderate-income planned for construction or rehabilitation, other than replacement housing.
 - The projected means of financing the proposed dwelling units for housing persons and families of low- and moderate-income planned for construction or rehabilitation.
 - A projected time table for meeting the plan's relocation, rehabilitation and replacement housing objectives.
- n) An analysis of the report submitted by the County Fiscal Officer (see "1" above), a summary of the consultation of the Agency, or attempts to consult by the Agency, with each of the affected taxing entities, and a proposed response to any written objections or concerns received from any affected taxing entity, including, as appropriate, any proposed or adopted mitigation measures.

1.4 GOALS OF THE AGENCY

Below is a list of general goals of the Agency. These goals are specifically listed in the Redevelopment Plan, and are intended to express what the Agency wishes to achieve as part of its community improvement program.

Vision Statement

Urban Environment

Overriding Goal: Enhance existing business and residential neighborhoods, and encourage new in-fill development as appropriate.

- Encourage development according to the City's General Plan, as it currently exists or may be amended in the future.
- Help preserve and enhance existing conforming residential neighborhoods through landscaping, street and other infrastructure improvements.
- Work with business and property owners to upgrade their properties within the Project Area.

- Rehabilitate deteriorated residential and commercial properties to eliminate safety deficiencies to extend the useful lives of these structures.
- Encourage policies that protect historic structures and ensure historic preservation in the Project Area.
- Work with property owners and businesses to clean up properties that are or have been exposed to hazardous materials.
- Work with property owners to eliminate the negative impacts related to non-conforming land uses.
- Provide for an appropriate buffer to residential neighborhoods from noise, odors, and vibrations for non-residential uses.
- Promote and ensure an environment that is friendly and safe for pedestrians.
- Strengthen pedestrian connections between neighborhoods, and from the Project Area to the rest of the City.

Economic Development

Overriding Goal: Create successful commercial and industrial employment areas to serve local residents, businesses, employees and visitors.

- Develop infrastructure improvements that facilitate private investment in the Project Area.
- Assist economically depressed properties to reverse stagnant or declining property investment through infrastructure improvements and programs.
- Expand opportunities for shopping and services by encouraging the development of new commercial uses that fulfill unmet needs in the community and rehabilitation of existing commercial properties.
- Work with property owners to consolidate parcels to induce new or expanded business development.

- Promote the development of new commercial and industrial opportunities that provide for diverse employment opportunities.
- Provide relocation assistance to businesses and residents in accordance with current law.

Housing Affordability and Quality

Overriding Goal: Establish the Project Area as a community with a high-quality housing stock that includes a variety of housing unit types affordable to a wide range of households.

- Improve the appearance and attractiveness of residential neighborhoods through neighborhood improvement programs, code enforcement efforts, and residential rehabilitation programs.
- Protect the health and general welfare of the Project Area's low- and moderate-income residents by utilizing 20% of the property tax increment revenues to improve, increase and preserve the supply of low- and moderate-income housing.
- Provide replacement housing as required by law if any dwelling units affordable to low- or moderate-income persons or families are lost from the housing supply as a result of Agency activities.
- Provide relocation assistance to businesses and households displaced by Agency activities.
- Provide housing rehabilitation programs to upgrade properties to eliminate blight and adverse code conditions.

Public Infrastructure

Overriding Goal: Improve the Project Area's public infrastructure system to ensure public health, safety and welfare of residents, businesses, and properties

- Provide for improvements to the infrastructure system that cannot be undertaken by a single property owner, but must be improved on an area-wide basis such as drainage improvements, water distribution lines, flood control facilities, and under-grounding of utilities.

- Provide a range of public infrastructure improvements that induce or facilitate private investment such as intersection upgrades, streets, curbs and gutters, sidewalks, street medians, alleyways, and parking management facilities.
- Work with property owners on the location and timing of improvements to economically assist the repositioning and development of parcels.
- Work with individual property owners to help provide water meters as necessary.

Plan Management

Overriding Goal: Ensure that the Lodi Community Improvement Project is managed in the most efficient, effective and economical manner possible.

- Encourage the cooperation and participation of property owners, tenants, residents, public agencies, and community organizations in the elimination of blighting conditions and the promotion of new or improved development in the Project Area.
- Establish programs and activities which assist, complement, and coordinate with public and private development and encourage revitalization and enhancement in the Project Area.
- Oversee the necessary infrastructure improvements in a coordinated and efficient manner.

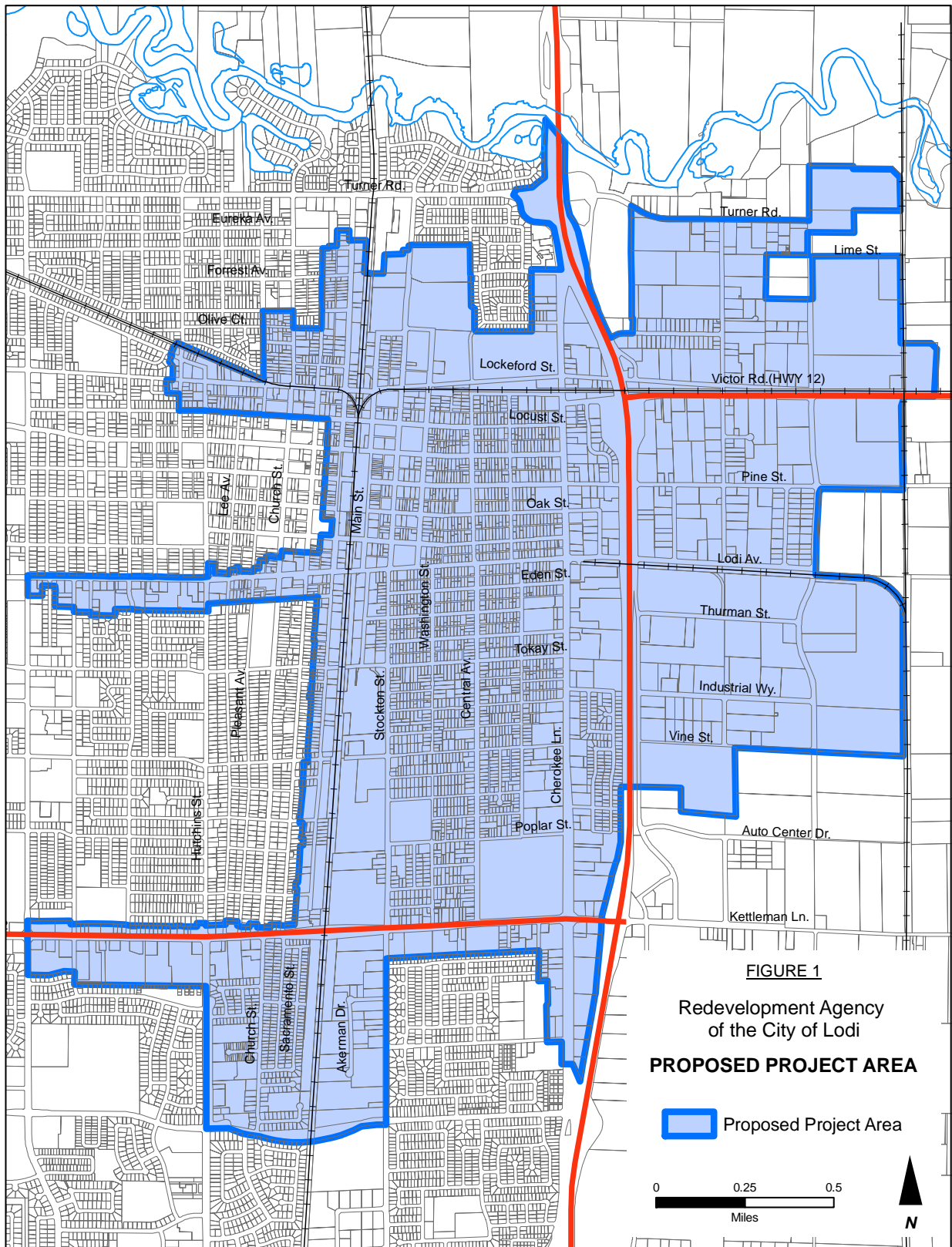
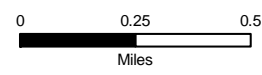
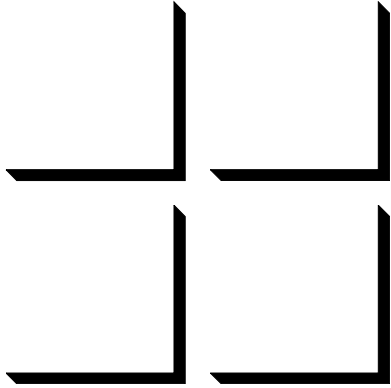


FIGURE 1
Redevelopment Agency
of the City of Lodi
PROPOSED PROJECT AREA

Proposed Project Area





2.0 REQUIREMENTS AND DEFINITIONS

The CRL sets forth a variety of conditions that must exist if an area is to be included in a redevelopment project. A blighted area is one that satisfies both of the following requirements:

1. An area that is predominantly urbanized, and is an area in which the combination of conditions set forth in CRL Section 33031 (see below) is so prevalent and so substantial that it causes a reduction of, or lack of, proper utilization of the area to such an extent that it constitutes a serious physical and economic burden on the community that cannot reasonably be expected to be reversed or alleviated by private enterprise or governmental action, or both, without redevelopment.
2. An area that is characterized by one or more conditions of physical blight and one or more conditions of economic blight (as defined in CRL Section 33031, below).

A blighted area that contains the conditions described above may also be characterized by the existence of inadequate public improvements or inadequate water or sewer utilities.

The CRL definition of blight encompasses a wide range of conditions. Deteriorated buildings, easily the most visible form of blight, are sometimes assumed by the layperson as the *only* form of blight. Deteriorated buildings are indeed an important characteristic of blight, but a project could satisfy all legal prerequisites and be properly adopted as long as there is only substantial evidence which otherwise establishes blight as proposed in the Community Redevelopment Law without any deteriorated buildings in the proposed Project Area. This is because the definition of blight is complex and involves many factors other than physical decay.

Economic blight components are often more subtle than physical blight conditions. For example, economic blight can include depreciated or stagnant property values, properties that contain hazardous wastes, or properties with abnormally low lease rates. Visual observation may not show such problems and the extent of some of these conditions may be inferred from the existence of certain physical conditions such as deteriorated buildings, vacant lots, or the presence of “marginal” businesses that are open but are poorly stocked and/or have few customers.

Another common misconception is that every parcel in a proposed area has to be blighted in order to qualify for redevelopment. According to Section 33321 of the CRL, the area need not be restricted to only those properties that exhibit detrimental conditions as long as such conditions predominate within the Project Area to the extent provided in Section 33030 and 33031 of the CRL. The proposed Project Area may also include non-blighted properties, the inclusion of which is necessary for effective redevelopment and not for the sole purpose of collecting tax increment.

“Urbanization”, as defined in the CRL, is sometimes misunderstood, because certain undeveloped parcels can be considered urbanized if they fall under one of two categories. These requirements, as well as others necessary for this Project, are addressed below.

2.1 Physical Blight

According to CRL Section 33031(a), the following conditions are the physical characteristics that cause blight:

- 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.
- 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.

- Adjacent or nearby incompatible land uses that prevent the development of those parcels or other portions of the project area.
- 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.

2.2 Economic Blight

In addition to having conditions of physical blight, redevelopment areas must also exhibit at least one condition of economic blight. According to CRL Section 33031(b), the following conditions are the economic characteristics that cause blight:

- Depreciated or stagnant property values
- Impaired property values, due in significant part, to hazardous wastes on property where the agency may be eligible to use its authority
- Abnormally high business vacancies, abnormally low lease rates, or an abnormally high number of abandoned buildings
- A serious lack of necessary commercial facilities that are normally found in neighborhoods, including grocery stores, drug stores, and banks and other lending institutions
- Serious residential overcrowding that has resulted in significant public health or safety problems
- An excess of bars, liquor stores, or adult-oriented businesses that has resulted in significant public health, safety, or welfare problems
- A high crime rate that constitutes a serious threat to the public safety and welfare.

2.3 Urbanization

Section 33320.1 of the CRL requires that the area proposed for redevelopment be predominantly urbanized. This means that not less than 80% of the area is either of the following:

- Has been or is developed for urban uses

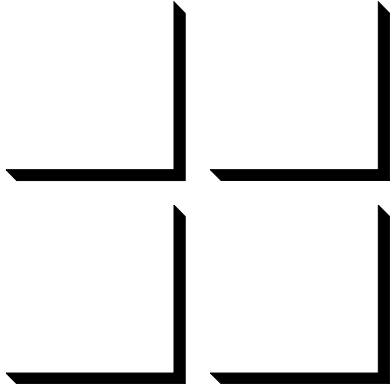
- Is an integral part of one or more areas developed for urban uses that are surrounded or substantially surrounded by parcels which have been or are developed for urban uses

2.4 The “Five-Part Test”

The prerequisites for redevelopment can be summarized into five basic requirements. Therefore, territory being considered as the proposed Project Area must be able to meet the following “five-part test:”

1. Must be predominantly urbanized.
2. Must have at least one physical condition of blight and at least one economic condition of blight, or be necessary for the effective redevelopment of the area.
3. The conditions of blight must be prevalent and cause a lack of proper utilization of the area.
4. The improper utilization must be a serious physical and economic burden on the community.
5. The burden cannot be reversed by private enterprise acting alone, by the public sector acting alone, or by both acting together without the assistance of redevelopment.

The “five-part test” will be discussed in more detail in Chapter 11.0. The determination of whether the proposed Project Area meets these various requirements is ultimately the responsibility of the City Council. This decision will be made after review of many types of information including, public comments and testimony, the information contained in this Report, and a variety of other documents.



3.0 REASONS FOR THE SELECTION OF THE PROPOSED PROJECT AREA

The primary elements in determining the boundaries of a redevelopment area are the locations of blight and urbanized property as defined by the CRL (see Chapter 2.0). Prior to the adoption of the proposed boundaries of the proposed Project Area by the Planning Commission, GRC Redevelopment Consultants, Inc. initiated a preliminary review of existing conditions on certain properties in the eastern portions of the City¹ to determine which area(s) should be included in a potential redevelopment area. The preliminary review together with input from City and Agency staff resulted in a boundary recommendation for the Project Area.

The primary reason for the selection of the proposed Project Area is the preliminary locations of blighted and urbanized property. Other factors, such as the goals of the General Plan and zoning ordinance, and the needs of the community were also considered in the boundary recommendation.

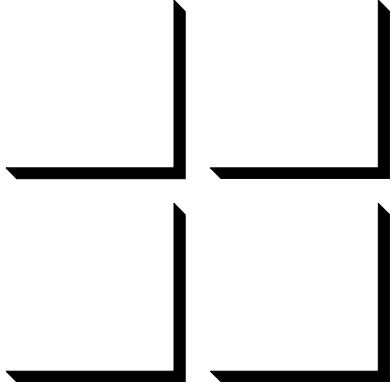
It is important to note that the boundaries of the Proposed Project Area are still not final and may change at any time until the close of the public hearing for this Project.

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

GRC
GRC
GRC

This page intentionally left blank

GRC
GRC
GRC



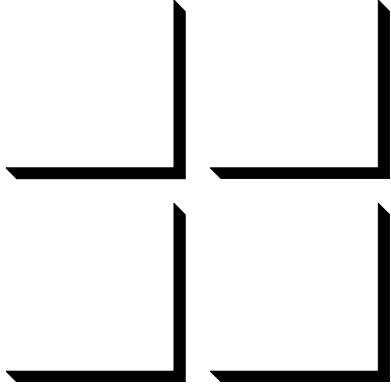
4.0 DESCRIPTION OF THE SPECIFIC PROJECTS PROPOSED BY THE AGENCY AND DESCRIPTION OF HOW THESE PROJECTS WILL IMPROVE OR ALLEVIATE BLIGHT

CRL Section 33352(a) also requires a description of the specific projects proposed by the Agency and a description of how these projects will improve or alleviate the blight outlined in this Report. This material is provided in Chapter 14.0 (Implementation Plan) and Chapter 12.0 (Why Blight cannot be Eliminated without Redevelopment or Tax Increment Financing).

GRC | GRC | GRC

This page intentionally left blank

GRC | GRC | GRC



5.0 URBANIZATION

To determine the extent of urbanization in the proposed Project Area, field surveys were performed to determine whether parcels were developed for an urban use or not developed for an urban use. If a parcel was not developed for an urban use, it was reviewed to see if it was surrounded or substantially surrounded by urban development, or if it had been developed at one time.

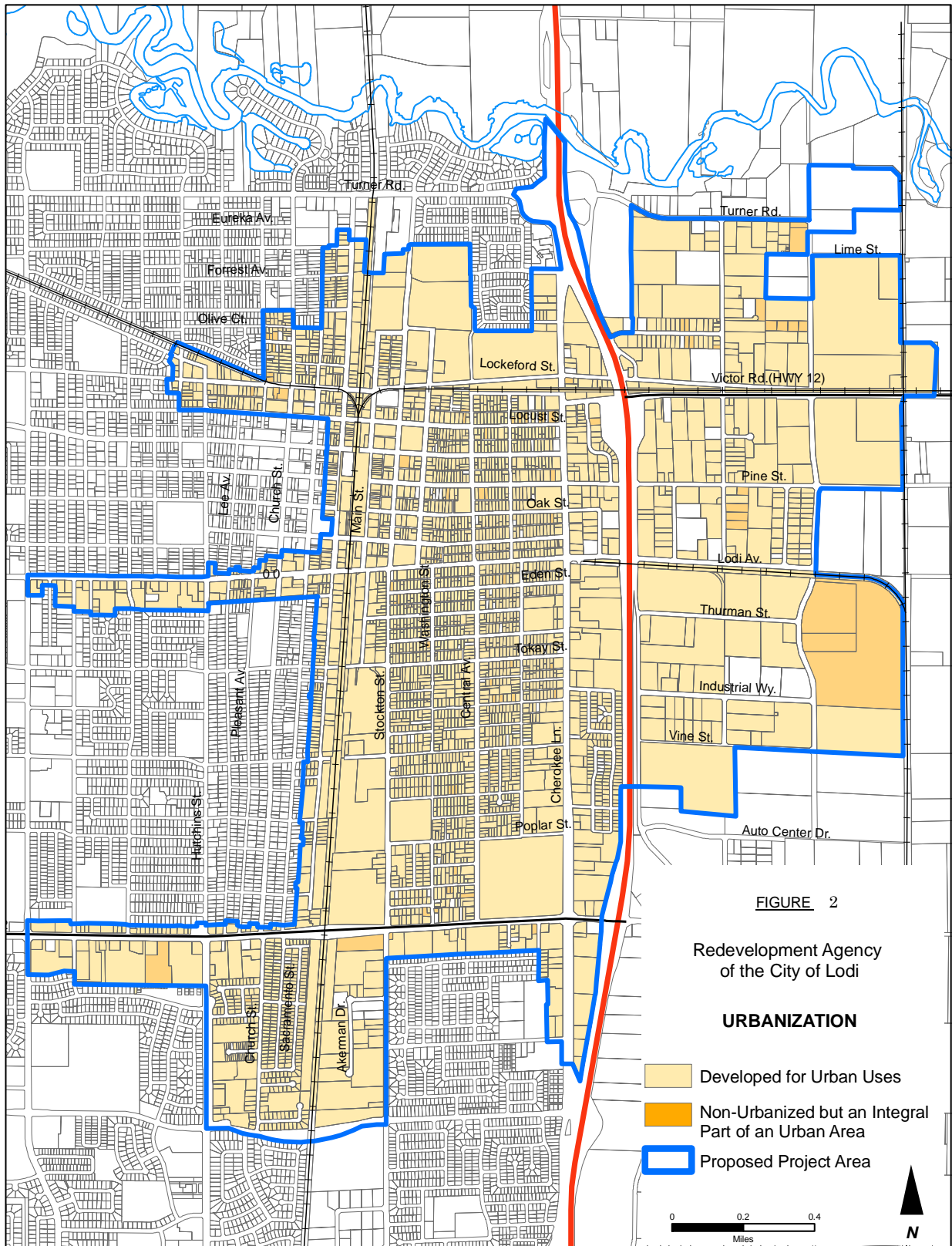
Table 1 shows there are 2,407.14 acres in the proposed Project Area, 423.53 of which are public streets. Of the remaining territory, 1,367.2 acres are developed for urban uses, and 60.4 acres are an integral part of an area developed for urban uses because they are surrounded or substantially surrounded by urban development. The remainder, 226.2 acres, is vacant and not urbanized.

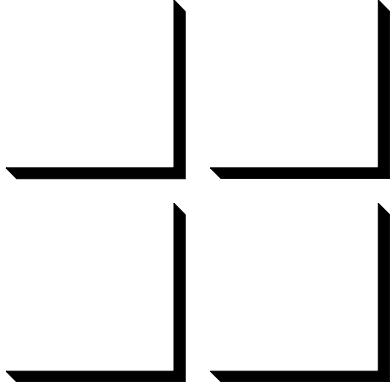
The result is that the proposed Project Area is 87% urbanized. See Figure 2 for a map showing urbanization.

TABLE 1
URBANIZATION

<i>URBANIZATION CHARACTERISTIC</i>	<i>ACRES OR %</i>
Urbanized land:	
Streets	505.1
Developed for urban uses	1367.2
Undeveloped, but integral part of an area developed for urban uses	60.4
Total urbanized land	1,932.7
Total land in the proposed Project Area	2,158.9
% urbanized	89.5%

Source: GRC Redevelopment Consultants, Inc.





6.0 EXISTING AND PLANNED LAND USES IN THE PROPOSED PROJECT AREA

Table 2 shows the land use breakdown for all current land uses in the Proposed Project Area, while Figure 3 shows the location of these uses.

Table 3 shows the planned land uses, based on the City’s General Plan. Figure 4 shows the locations of these planned uses.

**TABLE 2
EXISTING LAND USE**

<i>USE</i>	<i># OF PARCELS</i>	<i># OF ACRES</i>	<i>% OF GRAND TOTAL ACREAGE</i>
Church	22	41.30	1.91%
Commercial	475	326.48	15.12%
Industrial	323	554.61	25.69%
Multi-Family Residential	654	151.98	7.04%
Single-Family Residential	1816	253.56	11.74%
Mobile Home Park	3	6.79	0.31%
Mixed Use	47	12.49	0.58%
Public	90	216.79	10.04%
School	1	3.60	0.17%
Vacant	78	82.80	3.84%
Unknown	6	3.50	0.16%
<i>Sub Total</i>	<i>3,515</i>	<i>1,653.90</i>	<i>76.60%</i>
Streets	n/a	505.1	23.40%
<i>Grand Total</i>	<i>3,515</i>	<i>2,159.0</i>	<i>100.00%</i>

Source: GRC Redevelopment Consultants, Inc.

**TABLE 3
PLANNED LAND USE**

<i>USE</i>	<i># OF PARCELS</i>	<i># OF ACRES</i>	<i>% OF GRAND TOTAL ACREAGE</i>
Downtown Commercial	113	29.71	1.38%
General Commercial	287	169.97	7.87%
Neighborhood Community Commercial	156	79.82	3.70%
Office	20	7.71	0.36%
High Density Residential	14	9.56	0.44%
Medium Density Residential	114	31.77	1.47%
Low Density Residential	414	64.43	2.98%
Eastside Residential	1739	284.49	13.18%
Heavy Industrial	422	610.85	28.29%
Light Industrial	218	204.09	9.45%
Detention Basins and Parks	6	91.14	4.22%
Public/Quasi-Public	12	70.35	3.26%
Sub Total	3,515	1,653.90	76.60%
Streets	n/a	505.10	23.40%
Grand Total	3,515	2,159.00	100.00%

Source: GRC Redevelopment Consultants, Inc. and City of Lodi General Plan

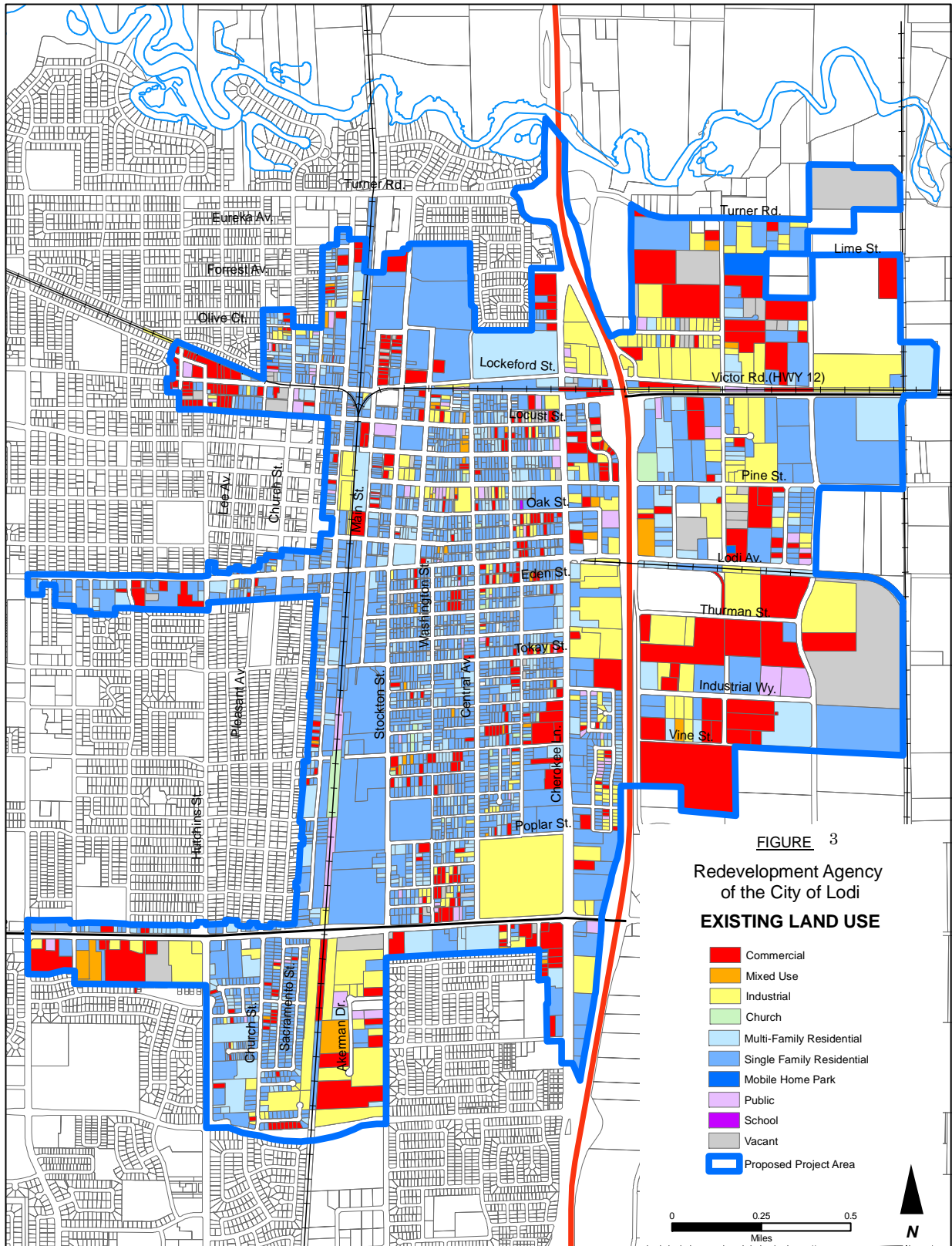
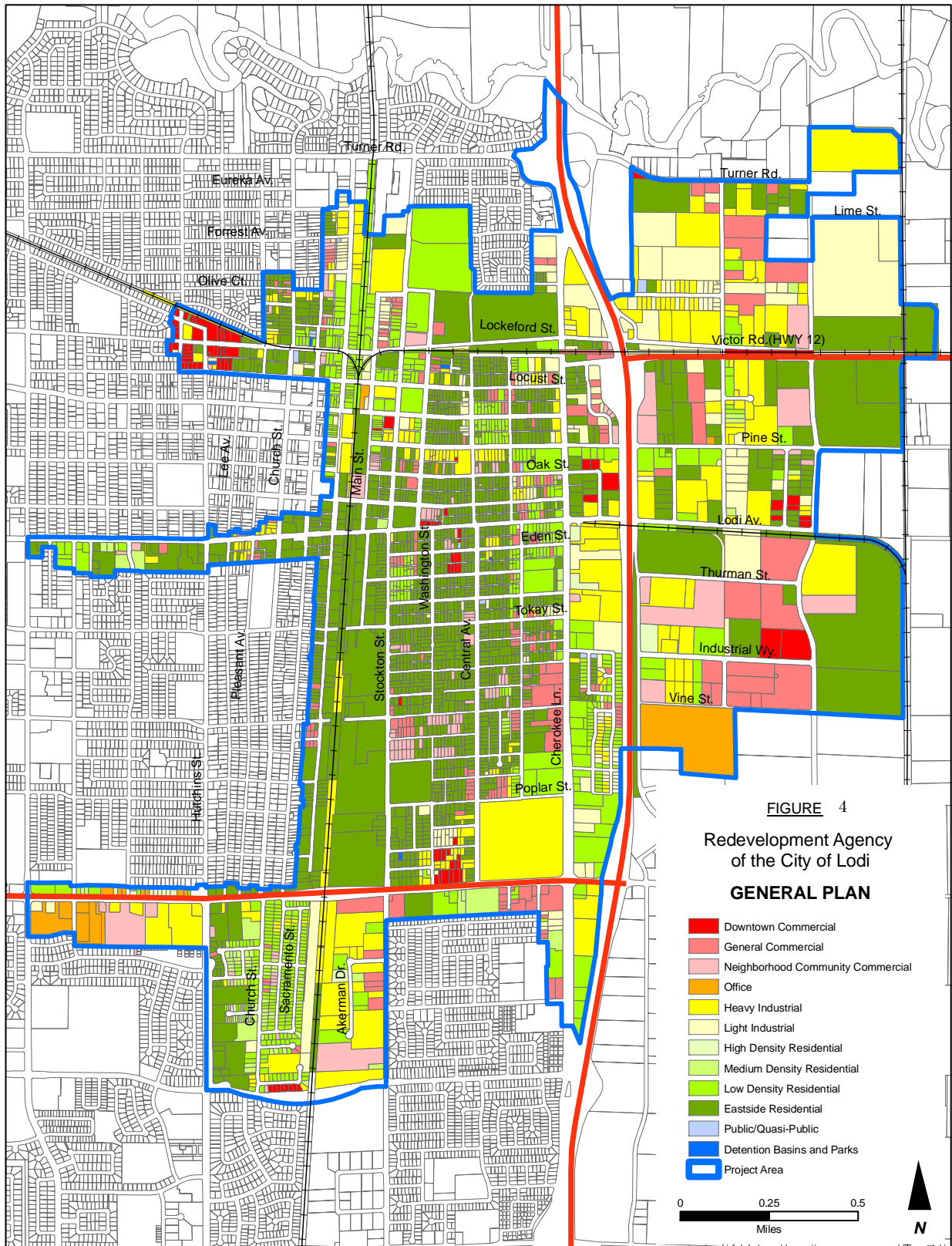


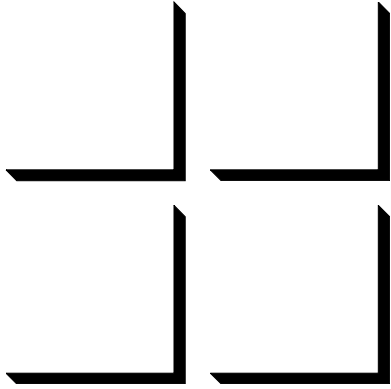
FIGURE 3
 Redevelopment Agency
 of the City of Lodi
EXISTING LAND USE

- 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







7.0 SOCIO-ECONOMIC PROFILE

There is a high degree of correlation between negative socio-economic factors and the presence of blight. For instance, low household and per capita incomes coupled with relatively high costs for such items as housing, inevitably results in less disposable income, and possibly overcrowded housing conditions as people “double up” to reduce housing costs. This lower disposable income translates into lower sales levels at nearby stores, and fewer financial resources to maintain and upgrade properties. Equally as important, though, is that lower disposable income results directly in a lower standard of living, foregone health care, and other conditions that result in a declining quality of life. These conditions are found throughout the Project Area and are discussed in Chapter 8.0 of this Report.

Coupling reduced income with older residential structures, which typically require higher-than-average levels of maintenance, is likely to result in properties falling into a deteriorated state over the long term. Continued deferred maintenance may allow a property owner to get by for a while, but such deferrals increase the risk that the property will not command the desired rent, lease, or sales price.² In turn, the value of the owner's investment is reduced or at least significantly impaired. In addition, property owners are less likely to “throw good money after bad” and invest additional funds to remediate deteriorating conditions.

A relatively low disposable income in a particular area means that less money is readily available to support neighborhood businesses. This, in turn, means that there will be fewer businesses operating in the neighborhood and of those that do, many may be only marginally profitable. Over time, marginally profitable businesses will themselves suffer from deterioration due to inadequate maintenance and/or may fail altogether.

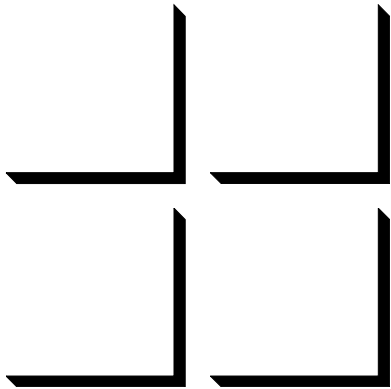
² Maintenance for Profits, p. 250, by James H. Koch. Published in Handbook of Property Management, Robert Irwin, Editor in Chief, McGraw-Hill Book Company, 1986.

To provide a socio-economic profile of the proposed Project Area, data from the U.S. Census Bureau was evaluated.³ The following statistics are important in understanding the overall consumer base, labor force, and other pertinent facts about the community:

- For persons 25 years or older in the proposed Project Area, nearly 37% have not received a high school diploma. This compares to 27% for the City of Lodi and 29% of San Joaquin County as a whole.
- The proposed Project Area's median household income is \$33,765, which is significantly lower than the City's median of \$39,570, and also lower than the County's \$41,282.
- The proposed Project Area's per capita income is only \$16,302, which also is significantly lower than the City's per capita income of \$18,719 and the County's of \$17,365.
- The percentage of homeowners in the proposed Project Area is 43%, as compared to 54% and 60% for the City and County respectively.
- Nearly 35% of proposed Project Area households earn less than 50% of the County's median household income, as compared to 24% for the City as a whole.
- The average year for structures built in the proposed Project Area is 1961, compared to 1972 for the City and 1973 for the County.

This indicates that disposable income is not as readily available for retail expenditures, or for residential maintenance and rehabilitation, and confirms the findings of Chapter 8.0 "Physical and Economic Conditions" relative to building conditions.

³ U.S. Bureau of the Census, *American Fact Finder*. 2008, based on 2000 Census.



8.0 PHYSICAL AND ECONOMIC CONDITIONS

To begin the process of assessing existing conditions in the proposed Project Area, the Agency initiated detailed field studies. Specific elements of this research included the creation of a database using San Joaquin County Assessor files. This file information was then supplemented with County Assessor's parcel data collected on a parcel-by-parcel basis in the field, through interviews with appropriate City employees, and through analysis of census data, parcel maps and other sources of information. The field studies were conducted by GRC Redevelopment Consultants staff (see Appendix A for detailed biographies).

The following is a description of the existing physical and economic conditions in the proposed Project Area. Photographs of sample properties in the proposed Project Area are also included. The photographs are not meant to represent every blighted property or every condition of blight observed in the Project Area; they are examples only.

8.1 BUILDINGS THAT ARE UNSAFE OR UNHEALTHY IN WHICH TO LIVE OR WORK

Section 33031(a) (1) of the CRL identifies buildings that are unsafe or unhealthy for persons to live or work in as being indicative of blight. The causes of such conditions include serious code violations, dilapidation and deterioration, defective design or physical construction, faulty or inadequate utilities, or other similar factors.

Hazardous Materials

In 1989, officials discovered that the groundwater in some areas of Downtown was contaminated with the chemicals tetrachloroethylene and trichloroethylene, which are used as industrial solvents and in dry cleaning and known to cause cancer. Over the years, these chemicals spread out to five different plumes in the city's groundwater.

The portion of groundwater that was affected includes all properties in the proposed Project Area located west of Highway 99. (See the map on the following page.) According to the City of Lodi, the area can be defined as "... an area of volatile organic compound contamination which may present or threaten to present an imminent and substantial endangerment to the public health, welfare or the environment within the City."⁴

Because of legal issues, pro-active measures to clean up the problems were delayed for several years. Preliminary testing in the mid-1990s revealed nearly 50 potential properties as the source, or sources, of the contamination.

Since 2005, contamination in the groundwater has decreased substantially. However, volatile organic compounds are still present above the water table.

As of late 2007, the cost to the City for clean-up was projected to be \$46,500,000. This is well over the entire City's operating budget for one year. As a result, City funds, such as the infrastructure replacement account, have been depleted.

This is precisely the type of situation for which redevelopment was created. There is a distinct problem that impacts a large portion of the community and a substantial amount of money is needed to alleviate the problem. The private sector cannot solve the problem alone, nor can the City. But, with redevelopment, and the public and private sector working together, a solution may be available.

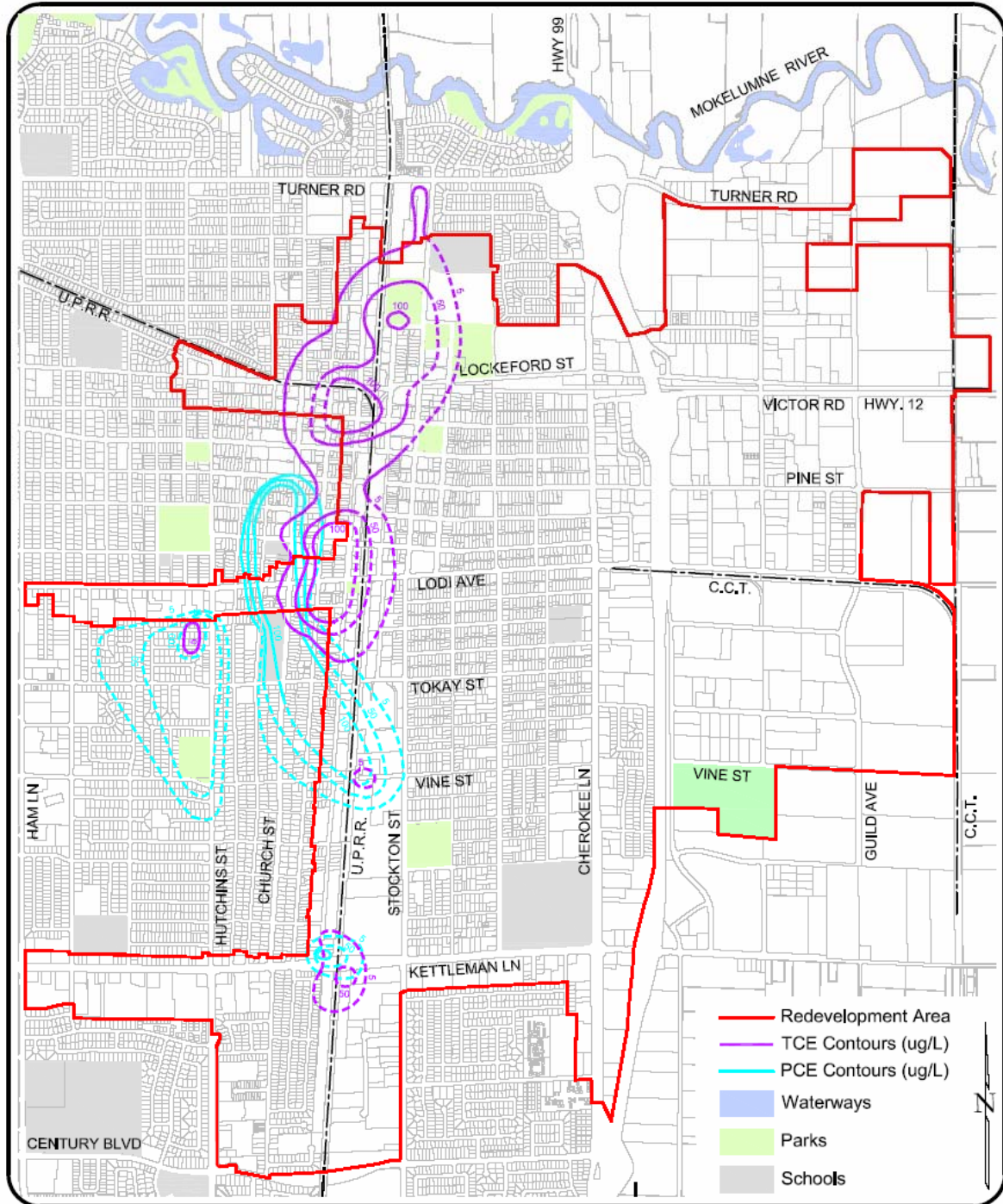
Because of the direct threat to public health and safety – a physical condition of blight – and the extreme costs involved – an economic condition of blight – it is likely that the proposed Project Area could qualify for redevelopment on this issue alone. However, there are many more instances of blight in the proposed Project Area, including additional threats of hazardous materials.

⁴ City of Lodi Press Release "Fact Sheet No. 5 May 2000"



CITY OF LODI
PUBLIC WORKS DEPARTMENT

**Citywide Contours
In Intermediate Zone Groundwater
(75-150 FT)**



K:\CADD\EXHIBITS\2008\08X008\08X008.dwg, Contours, 05/14/2008 11:52:40 AM, jplzzo

Due to the age of structures, the building types, and the many auto-related businesses, the likelihood of more hazardous material contamination is significant. According to the Environmental Protection Agency and the Centers for Disease Control, approximately 80% of homes in the U.S. built prior to 1978 contain lead-based paint. In addition, a study of public buildings by the State of California Department of Health Services revealed that 83% of structures built before 1976 contain bulk-material asbestos.

This means that about 1,830 properties in the proposed Project Area are strong candidates for exposure to hazardous materials because they were constructed prior to the abolition of asbestos and lead-based paint. (See Figure 5) This likely presence of hazardous materials severely limits the ability of property owners to expand, modernize, or otherwise rehabilitate their structures because of the extreme costs involved with maintenance and removal of hazardous materials. However, financial assistance could be available through the Agency if the proposed Project is approved.

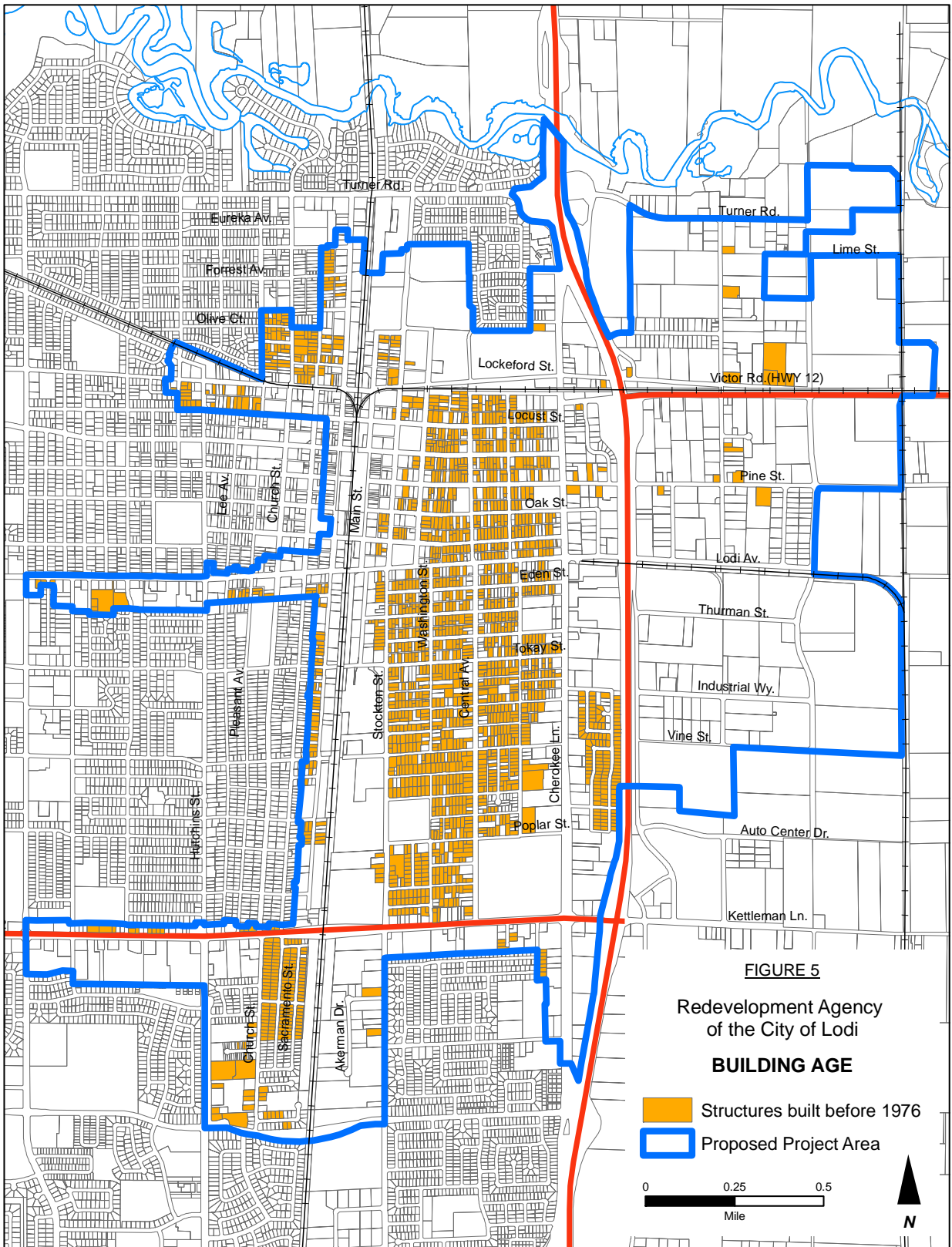
Asbestos is a significant health concern when individual fibers are released into the air through damage to building materials or through routine maintenance such as sanding, drilling, etc. If these fibers are inhaled, they can become permanently imbedded in the lungs, and scar the lung tissue. This condition can lead to several varieties of cancer.

The common uses for asbestos-containing materials in buildings are for fireproofing on steel beams, and insulation on ceilings and metal piping. Asbestos can also be found in roofing materials, wallboard, exterior siding, floor tile, and adhesives.

Lead-based paint is equally harmful. Children, especially those under the age of six, are particularly vulnerable to lead poisoning. Because the neurological system of a child under age six is in its developmental stages, the effects of lead exposure are significant.⁵

Interestingly, it is not just deteriorated buildings that expose residents and employees to lead poisoning. The most common form of exposure is the ingestion of lead through dust and soil that have been contaminated over decades of slow accretion of lead particles. The EPA estimates that 24% of properties with lead-based paint are likely to have contaminated soil.

⁵ U.S. Environmental Protection Agency "Protect Your Family From Lead in Your Home" APRIL 1999



The costs to alleviate the health and safety risks related to asbestos, lead-based paint, and other hazardous materials can be extremely expensive. Assuming an average of \$10,000 per structure,⁶ the total cost to eliminate these risks throughout the proposed Project Area would be around \$18,300,000. These costs are not only a burden on the community, but can also deter reinvestment in individual properties. Redevelopment, however, gives the Agency the option to authorize funds for activities like the clean-up of hazardous materials.

It is important to note that the Agency will not require removal of lead based paint or asbestos from any privately owned structure, unless the Agency is providing some sort of financial assistance for an improvement project and/or a permit is issued for construction activity. Either way, significant costs are added because of the existence of these hazardous materials. Because the risks increase with regular maintenance, rehabilitation, additions, or other improvements, the costs also increase, thereby substantially hindering the economic viability of those properties in the proposed Project Area.

Deterioration

The bulk of the problems related to deterioration in the proposed Project Area have more to do with its economic impact on property owners than its health and safety impact on residents or workers. Buildings with characteristics of deterioration will be discussed in the sections called “Conditions that Prevent or Substantially Hinder the Viable Use of Buildings or Lots” and “Depreciated or Stagnant Property Values” later in this Chapter.

Nine properties in the proposed Project Area have structures on them that may be considered unhealthy or unsafe due to the degree of dilapidation observed.

Photos A1 – A4 show examples of properties with severe deterioration.

⁶ Pinchen Environmental, Washington.

Photo A1
Damaged exterior walls and roof, and a room addition that is likely unpermitted.



Photo A2
Damaged exterior walls and roof with large portions of the roofing material missing. This building is vacant.



Photo A3
Large portions of the exterior wall surface are missing.



Photo A4

Damaged exterior walls and roof as well as inadequate roofing material (rolled roof). Room addition is likely unpermitted.



Deteriorated structures have a significant impact on property values. As shown in Table 4, the average assessed value of properties with dilapidated structures in the proposed Project Area is much lower than those that are in good condition in the proposed Project Area. This demonstrates the negative affect that dilapidation (a physical condition of blight) has on property values (an economic condition of blight).

**TABLE 4
VALUE PER ACRE FOR PROPERTIES THAT ARE DILAPIDATED**

TYPE	VALUE PER ACRE	DIFFERENCE
Structurally Sound	\$744,817	n/a
Dilapidated	257,127	-65%

Source: San Joaquin County Assessor and GRC Redevelopment Consultants, Inc.

7.2 CONDTIONS THAT PREVENT OR SUBSTANTIALLY HINDER THE VIABLE USE OF BUILDINGS OR LOTS

Section 33031(a)(2) of the CRL identifies those characteristics that prevent or substantially hinder the viable use or capacity of buildings or lots as substandard design, inadequate size given present standards and market conditions, lack of parking, or similar factors.

Building deterioration, poor property maintenance, and substandard design in the form of commercial obsolescence are

just a few of the major problems that hinder the viability of uses in the proposed Project Area and result in lower property values.

Despite being bisected by a freeway and well-served by railroad tracks, the commercial and industrial properties in the proposed Project Area, which account for about half of the area, have not maintained their attractiveness as business areas. Rather, the proposed Project Area suffers primarily from haphazard and uncoordinated development patterns, and unclean conditions. It appears that the proposed Project Area has received little financial investment from the private sector to alleviate such conditions. Thus, the cycle of blight continues without remediation.

Deterioration

To research and document structural and aesthetic conditions of properties in the proposed Project Area, field surveys were conducted in early 2008. Surveys were conducted on foot and in a vehicle by a professional with over 20 years of property evaluation experience in California, including 18 years of redevelopment experience.⁷

For the safety of the evaluator, and because the Agency does not have the authority or budget to inspect each structure inside and out, visual observations were made from the public right-of-way. No conclusions were made regarding physical conditions inside the structures based on observations from outside the structures.

When performing any type of structural conditions survey that examines only the exteriors of structures from the public right-of-way, there are two main points to consider. First, the evaluator can examine only the most durable portions of the structure including the roof, exterior walls, and windows. Second, the exterior of a structure may be concealing any number of structural deficiencies, which could negatively impact the integrity or safety of the structure, but may not be visible from the exterior of the structure.

The presence of additional negative conditions that may be hidden by the more-durable exterior is highly likely, considering the average age of buildings in the proposed Project Area is 60 years. This means that, if anything, conditions of deterioration are more prevalent than indicated in this Report.

⁷ See Appendix A for information on the background of the evaluator.

Buildings in the proposed Project Area were placed into one of three categories:

- **Structurally Sound** – Excellent condition; adequately maintained; no repairs needed.
- **Needs Renovation** – Maintenance is deferred; needs minor-to-moderate repairs; requires a moderate capital investment. Includes, but is not limited to, large areas of peeling or chipping paint, deteriorated roofing materials, sagging roof, leaning walls, cracked, chipped, or poorly patched exterior finishes, rotting wood, inappropriate building materials such as bare plywood, and broken windows.
- **Dilapidated** – Significant damage; requires major repairs; requires substantial capital investment or replacement.

The results of the field survey revealed that about 22% of the buildings in the proposed Project Area are in some degree of disrepair. This means approximately 930 buildings (or about one out of every four) in the proposed Project Area need some level of substantial improvement – everything from a coat of paint and minor repair work to major rehabilitation. Dilapidated structures have already been addressed in the previous Section, and those that need renovation are discussed below. (See Appendix B for a list of each parcel and the reason(s) for its inclusion in the Project Area.)

The types of deterioration observed on those structures that need renovation in the proposed Project Area include:

- Roof damage
- Cracked stucco/plaster and other exterior wall damage
- Wood rot
- Large areas of chipped and/or peeling paint, which exposes bare wood and increases the likelihood of rot and mold, and reduces fire resistance

Commercial structures are impacted by deterioration even more than residential properties. A poorly maintained commercial building will not only give a negative impression to a potential shopper, it can also act as a deterrent to investors in the area. When commercial structures fall into disrepair, businesses often lose customers, go out of business, and are replaced by lower-quality businesses. Alternatively, the structures may remain vacant for long periods of time. Businesses that are more “marginal” generally do not produce as much revenue and, therefore, do not have as much money

available for capital improvements. Thus, the cycle of deterioration and obsolescence continues, and is unlikely to reverse without redevelopment.

It is highly likely that the decline of the building stock in the proposed Project Area is also acting as a disincentive for nearby property owners to upgrade and maintain their existing structures. The California Legislature has determined that blighting conditions themselves create a disincentive for nearby property owners to maintain their properties. According to CRL Section 33036(a), the existence of nearby deterioration tends to further exacerbate deterioration “because of the lack of incentive to the individual landowner and his inability to improve, modernize, or rehabilitate his property while the condition of the neighboring properties remains unchanged.”

Inadequate maintenance may be attributed to many causes, including insufficient funds, the lack of an economic incentive to keep the property maintained, lack of knowledge of the property condition, or unwillingness to commit to regular maintenance activities. Whatever the cause, if allowed to persist, the cycle of deterioration can, as well, deter adequate maintenance of nearby structures by creating an incompatible condition that acts to prevent or deter the maintenance of the affected parcels and other parcels nearby.

Commercial Obsolescence

Another significant form of blight in the proposed Project Area is commercial obsolescence, which includes old and antiquated buildings and/or façades, antiquated signage, outdoor storage of junk and/or equipment, dirty and un-maintained properties, and poor parking/access. About 45% of commercial properties in the proposed Project Area were observed with these conditions.

A key component to a successful commercial area is a pleasing, up-to-date appearance. If potential customers do not feel safe, if the building is not inviting, if pedestrian amenities are not available, or if parking is not convenient, they will go elsewhere. Almost half of the proposed Project Area is made up of such properties as well as those with older, smaller stores that are not well-maintained, have no relation to each other, and possess few positive design elements.

Outdoor storage, for example, has a significant effect on the image of the area as well as the psyche of its residents and

workers. Most importantly, it generally promotes further decline of the area and hinders private investment

Obsolete commercial uses have a significant impact on property values. As shown in Table 5, the average assessed value of properties with obsolete commercial and industrial structures in the proposed Project Area is much lower than those that are not obsolete in the proposed Project Area. This demonstrates the negative affect that dilapidation (a physical condition of blight) has on property values (an economic condition of blight).

**TABLE 5
VALUE PER ACRE FOR OBSOLETE COMMERCIAL AND INDUSTRIAL
PROPERTIES**

<i>TYPE</i>	<i>VALUE PER ACRE</i>	<i>DIFFERENCE</i>
Non-obsolete	\$911,460	n/a
Obsolete	777,330	-15%

Age

Building age is a significant factor in obsolescence, deterioration, and other factors that hinder proper usefulness in the proposed Project Area. As mentioned earlier, on parcels where age data is known, the average age for a building in the proposed Project Area is 60 years. This includes 858 structures over 75 years old and 87 structures over 100 years old.

Compared to the remainder of the City, the Project Area, on average, is 27 years older, as shown below:

	<u>PROJECT AREA</u>	<u>REST OF CITY</u>
Average construction date	1948	1975

Generally, individual building systems begin to reach the end of their life expectancies at about 30 years. Roofs, elevators, heating and air conditioning, and other important systems all are likely to need replacement or major rehabilitation in order to function properly. Such repairs only multiply as age increases.

The life expectancy of certain household components, according to the U. S. Department of Housing and Urban Development

Residential Rehabilitation Inspection Guide (2000), is as follows:

<i>ITEM</i>	<i>YEARS</i>
Showers/tubs	10-25
Cabinets	15-20
Exterior water-proofing finishes	1-5
HVAC systems	10-15
Smoke detectors	12
Exterior paint	7-10
Sinks/faucets	15-30
Gutters/downspouts	30
Windows	20-50
Roof – asphalt or wood shingles	15-30
Roof – tile	50
Roof – built-up	12-25

With nearly 2,680 structures in the proposed Project Area at least 30 years old, it is clear that significant investment has been and will be needed to maintain these structures. However, re-investment is difficult in a City where household income levels are lower than the County.⁸

Absentee Property Owners

A major factor that historically contributes to poor structural conditions is absentee ownership, especially single-family dwelling units. According to information from the San Joaquin County Assessor, 989 out of nearly 3,000 residential parcels within the proposed Project Area are owned by absentee owners, and 55% of those are single-family dwellings. This is almost twice the absentee rate of the remainder of the City, as shown below:

	<u>PROJECT AREA</u>	<u>REST OF CITY</u>
Absentee-owned residences	33%	17%

Owners of residential property in the proposed Project Area have their mailing addresses in 13 different states, including the following:

- Arizona
- California
- Colorado
- Florida

⁸ \$39,570 for the City compared to \$41,282 for the County (U.S. Census, 2000).

- Illinois
- Maryland
- Montana
- North Carolina
- Nevada
- Oregon
- Pennsylvania
- Texas
- Utah

The fact that so many owners are spread so far throughout the country demonstrates the task the City faces in encouraging improvements without the use of redevelopment, or in effective code enforcement. Combined with commercial, industrial, and multi-family owners who are all absentee owners, and the task is even more daunting.

Without redevelopment, it is extremely difficult to revitalize an area with such a combination of deterioration, obsolescence, and absentee owners. The high percentage of absentee property owners combined with relatively low household incomes making resources available to maintain housing units work against overall community upkeep and maintenance. This, coupled with a lack of resources available through community (including City of Lodi) agencies, means that continuing community decline is likely. The result is an area that is highly unlikely to change without the combined effort of the public and private sector using the tools of redevelopment planning.

Within the proposed Project Area, property values of single-family residential property owned by absentee owners are significantly lower than those that are owner-occupied, as shown in Table 6.

TABLE 6
ASSESSED VALUE PER ACRE FOR
ABSENTEE-OWNED SINGLE-FAMILY RESIDENTIAL PROPERTY

TYPE	TOTAL VALUE PER ACRE	DIFFERENCE
Owner-Occupied	\$974,632	n/a
Absentee	\$673,225	-31%

Source: San Joaquin County Assessor and GRC Redevelopment Consultants, Inc.

Inadequate Public Improvements

Another characteristic that has a significant negative affect on the proposed Project Area is the lack of adequate public facilities and infrastructure. The absence of adequate infrastructure and the readily apparent decline of existing facilities signal to the investment community that the cost of new development is likely to be much higher in order to construct or repair local infrastructure. This, in turn, discourages private investment.

Improvements needed throughout the proposed Project Area include:

- Curb, gutter and sidewalk construction
- Street reconstruction
- Streetlight installation
- Utility line undergrounding
- Sewer and water line improvements
- Storm drainage
- Various pedestrian improvements
- Alley improvements
- Billboard removal
- Improved signage
- Soundwalls
- Traffic signalization
- Parks and recreation facilities
- Library
- Public safety facilities
- Animal Shelter
- Improvements to the Grape Bowl

The current cost estimate to provide adequate infrastructure and public facilities to the proposed Project Area is over \$148,000,000. This amount is based upon the estimated cost to remedy infrastructure defects based upon 2008 dollars and does not reflect inflation or interest cost.⁹

The result of such poor infrastructure is that the proposed Project Area is functionally “stuck” in its current condition.

⁹ City of Lodi, 2008. Based in interviews and data provided by City staff.

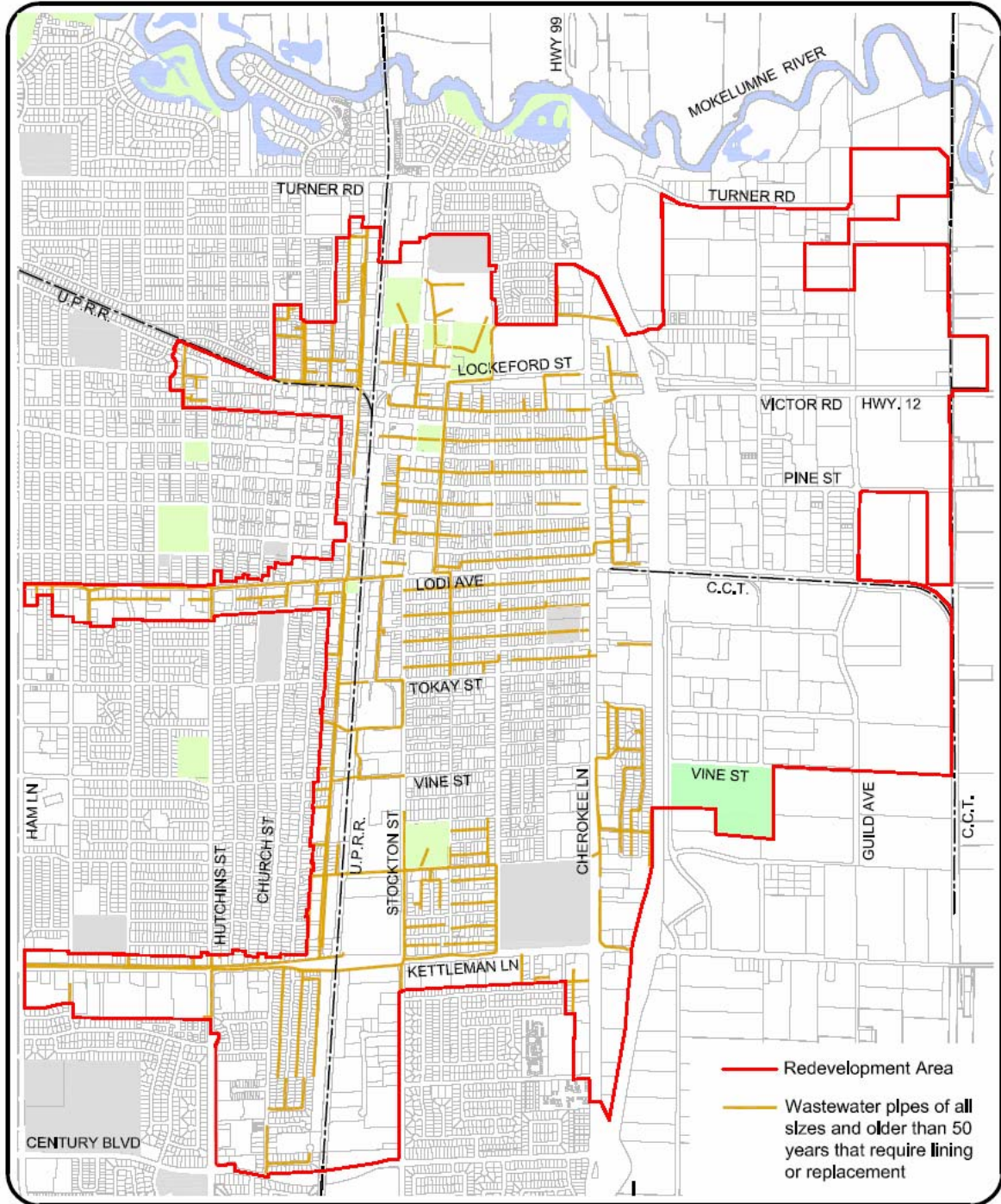
The City is not in a financial position to pay for all of the improvements that are needed, and the private sector has neither the funds nor the authority to make such improvements. In addition, private investors are unlikely to consider that infrastructure investments yield adequate returns. However, one of the fundamental elements of improving an area through redevelopment is the construction of public facilities and infrastructure. If this Project is approved, funds will be in place to “bridge the gap” between what is needed and what is available. Part 9 of this Report has additional information on public improvement and facilities needs, with maps that show the location of various types of deficiencies.

According to Section 33030 (c) of the CRL, a blighted area is one that consists of inadequate public improvements or inadequate water or sewer utilities. As the following maps show, the project area in Lodi lacks adequate wastewater facilities and has street, water, and storm system deficiencies.



CITY OF LODI
PUBLIC WORKS DEPARTMENT

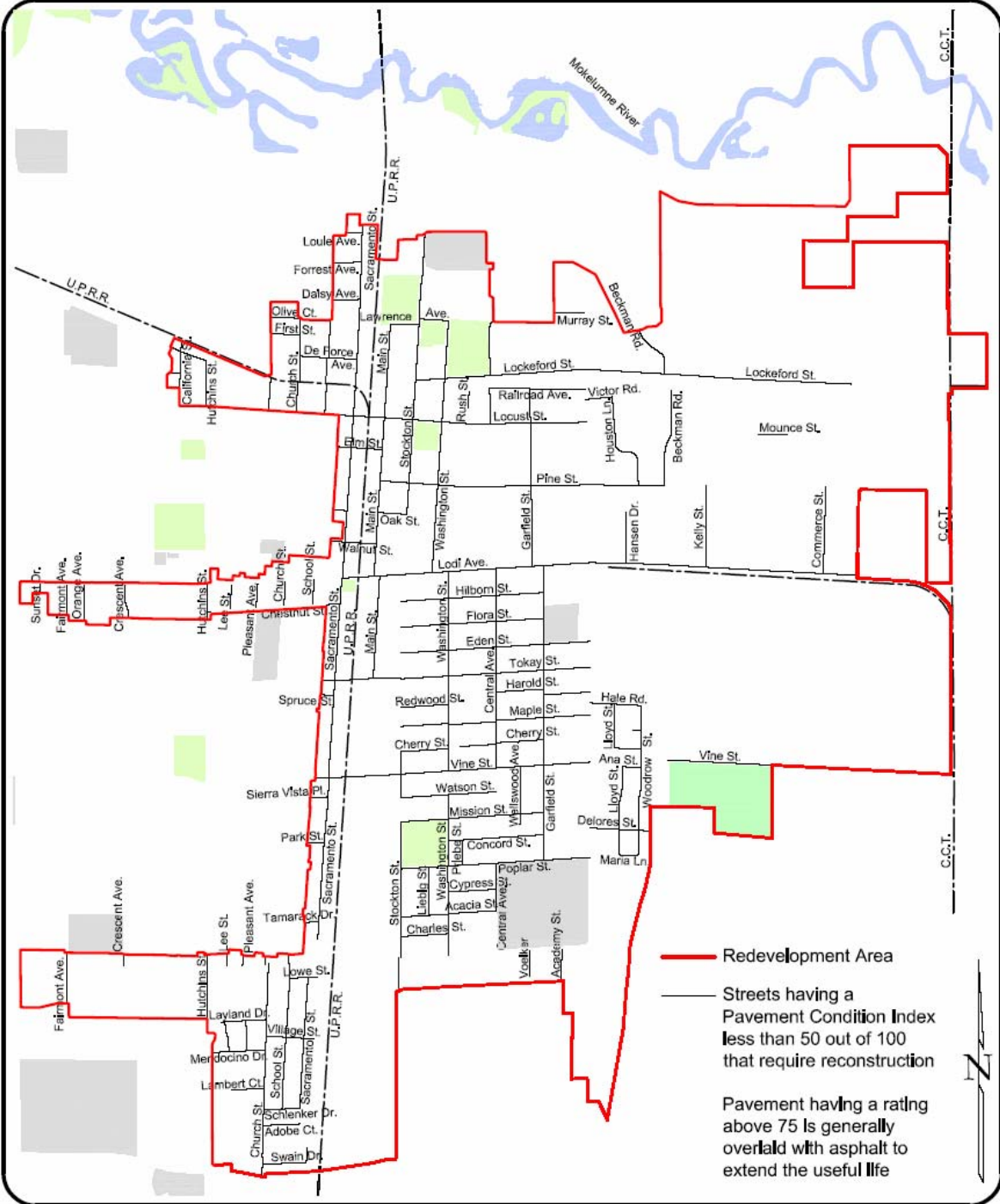
Wastewater System Deficiencies Within Redevelopment Area



K:\CADD\EXHIBITS\2008\08X008\08X008.dwg, Wastewater, 05/14/2008 11:51:40 AM, jplzco



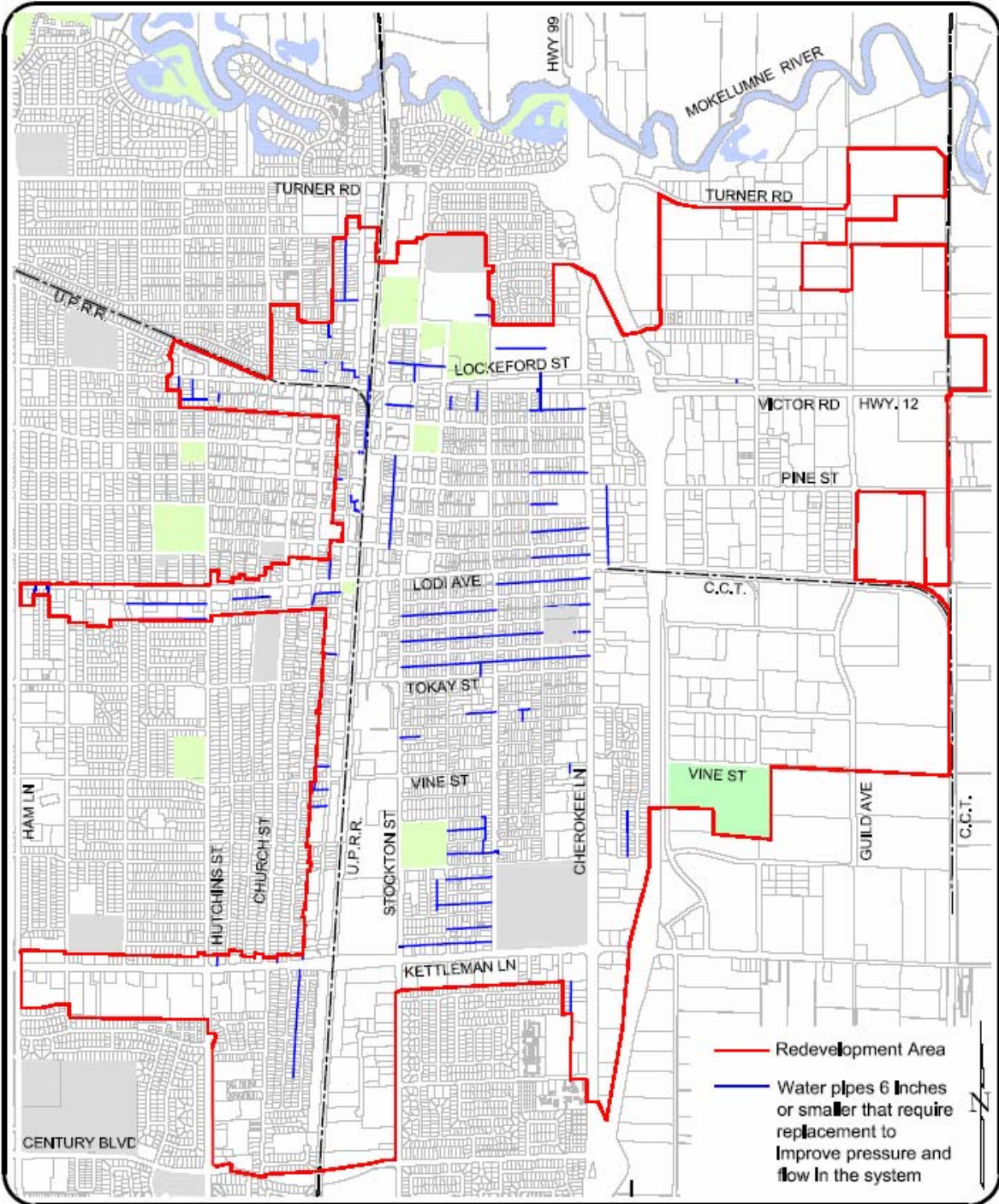
Street System Deficiencies Within Redevelopment Area



K:\CADD\EXHIBITS\2008\08X008\08X008.dwg, Streets, 05/14/2008 11:50:20 AM, jplzco



Water System Deficiencies Within Redevelopment Area



K:\CADD\EXHIBITS\2008\06X008\08X008.dwg, Water, 05/14/2008 11:51:08 AM, jplzoo

Miscellaneous

Other conditions that have a significant negative effect on the viability of properties in the proposed Project Area include properties with no landscaping, residential overcrowding, graffiti, exposed trash containers, barbed- and razor-wire, and residential structures that have been converted into businesses. Such conditions were observed on 293 parcels.

Photos B1 – B64 are examples of properties with the conditions described above.

Photo B1

Damaged exterior walls. Obsolete design, no setback, no on-site parking, and no landscaping. Boarded up windows do not provide ample light and ventilation. This property requires a substantial investment to rectify these problems.



Photo B2

Obsolete commercial strip dominated by buildings with minimal design elements, outdated signs, no landscaping, and small and damaged parking lots. The problems in this area are beyond one property owner making improvements on one property; they require a coordinated effort between the public and private sectors.



Photo B3

Low quality metal structure with a damaged and rusted roof. No setback, inadequate signage and lack of landscaping add to the obsolescence. This property requires a substantial investment to rectify these problems.



Photo B4

Garage converted into residence that is likely unpermitted. Significant damage to exterior wall. This property requires a substantial investment to rectify these problems.



Photo B5

Obsolete commercial strip dominated by buildings with minimal design elements, outdated signs, no landscaping, and no on-site parking lots. In addition, merchandise is displayed in the public right-of-way. The problems in this area are beyond one property owner making improvements on one property; they require a coordinated effort between the public and private sectors.



Photo B6

Damage to exterior walls and large areas of missing paint. Room addition is likely unpermitted. Exposed trash cans and dirt yard add to unmaintained look. This property requires a substantial investment to rectify these problems.



Photo B7

Wood rot and damage throughout the exterior. This property requires a substantial investment to rectify these problems.



Photo B8

Damaged driveway and driveway approach. In addition, ponding water on the street indicates a lack of adequate drainage. The problems in this property require a coordinated effort between the public and private sectors.



Photo B9

This building suffers from wood rot, damaged exterior walls, and large areas of missing paint. The lack of railings on the stairs is unsafe, especially with a screen door that opens beyond the first step. This property requires a substantial investment to rectify these problems.



Photo B10

Lack of sidewalk is not only an aesthetic issue, but is dangerous for pedestrians. Such conditions reduce the “curb appeal” of a property and negatively affect surrounding properties.



Photo B11

Trailer park filled with deteriorated mobile homes, trailers, and RVs in very close proximity to each other. Many spaces with outdoor storage, which is unattractive and can lead to vermin infestation and fire hazards. Several parked vehicles restricting emergency access. The problems in this area are beyond one property owner making improvements on one property; they require a coordinated effort between the public and private sectors.



Photo B12

Apartments surrounded by commercial uses. Minimum design elements and open space. Trash and debris were observed throughout the property. This property requires a substantial investment to rectify these problems.



Photo B13

Damaged Quonset hut with minimal openings for light and ventilation. This property requires a substantial investment to rectify these problems.



Photo B14

Building needing a new roof. This property requires a substantial investment to rectify these problems.



Photo B15

Vacant lot with inoperable vehicles, machinery, and junk. Barbed and concertina wire indicates high crime area. Such conditions reduce the “curb appeal” of a property and negatively affect surrounding properties.



Photo B16

Metal building with significant damage. Outdoor storage throughout site and merchandise is being displayed on public right-of-way. Such conditions reduce the “curb appeal” of a property and negatively affect surrounding properties.



Photo B17

Former gas station turned into a restaurant with minimum improvements. Damaged exterior walls and no landscaping. This property requires a substantial investment to rectify these problems.



Photo B18

Lack of driveway and parking area forces cars to be parked on the dirt. Such conditions reduce the “curb appeal” of a property and negatively affect surrounding properties.



Photo B19

Damaged exterior walls and large areas of missing paint. Wood appears to be rotting. This property requires a substantial investment to rectify these problems.



Photo B20

Outdoor storage of equipment detracts from the “curb appeal” of the property, negatively affects nearby properties, and can lead to vermin infestation.



Photo B21

Obsolete design, no setback, no on-site parking, and no landscaping. Rusted metal structure with outdoor storage. This property requires a substantial investment to rectify these problems.



Photo B22

Outdoor storage of equipment can lead to vermin infestation and, along with barbed wire, detracts from the “curb appeal” of the property and negatively affects nearby properties. Metal building and asphalt driveway are damaged, requiring a substantial investment to rectify.



Photo B23

This building suffers from damaged exterior walls, lack of paint, and wood rot. The concertina wire on top of the security fence indicates a high crime area and reduces the “curb appeal” of a property and which negatively affect surrounding properties. This property requires a substantial investment to rectify these problems.



Photo B24

This commercial building has an obvious lack of parking with cars double-parked on the site and parked on the sidewalk. In addition, the trailer is being stored on the street. Note also the need the utility undergrouding. This property requires a substantial investment to rectify these problems.



Photo B25

Industrial use with unscreened machinery and junk stored all over the site. Barbed wire indicates high crime area. Such conditions reduce the “curb appeal” of a property and negatively affect surrounding properties.



Photo B26

This property suffers from an obsolete design, no setback, no on-site parking, graffiti, and no landscaping. Boarded up windows do not provide ample light and ventilation. This property requires a substantial investment to rectify these problems.



Photo B27

This property suffers from illegal dumping and close proximity to the very busy railroad tracks, which creates substantial noise, vibrations, and odor. Such conditions reduce the “curb appeal” of a property, negatively affect surrounding properties, and require a coordinated effort between the public and private sectors.



Photo B28

This property suffers from illegal dumping, close proximity to the very busy railroad tracks, which creates substantial noise, vibrations, and odor, and a lack of sidewalk. In addition, the driveway is severely damaged, the barbed wire security fence indicates a high crime area, and overhead utility lines are nearby. Such conditions reduce the “curb appeal” of a property, negatively affect surrounding properties, and require a coordinated effort between the public and private sectors.



Photo B29

This commercial property suffers from an obsolete design, exposed mechanical equipment, and no landscaping. This property requires a substantial investment to rectify these problems.



Photo B30

Industrial use with equipment and junk openly stored throughout the site. Barbed wire indicates high crime area. Note also the nearby overhead utility lines. Such conditions reduce the “curb appeal” of a property and negatively affect surrounding properties.



Photo B31

Industrial use with equipment openly stored throughout the site. Such conditions reduce the “curb appeal” of a property and negatively affect surrounding properties.



Photo B32

Industrial use with equipment and junk openly stored throughout the site. Barbed wire indicates high crime area. Such conditions reduce the “curb appeal” of a property and negatively affect surrounding properties.



Photo B33

Residential use with inoperable vehicles and junk openly stored throughout the site. Such conditions reduce the “curb appeal” of a property, can lead to vermin infestation, and negatively affect surrounding properties.



Photo B34

Obsolete commercial strip dominated by buildings with minimal design elements, outdated signs, no landscaping, and small and damaged parking lots. The problems in this area are beyond one property owner making improvements on one property; they require a coordinated effort between the public and private sectors.

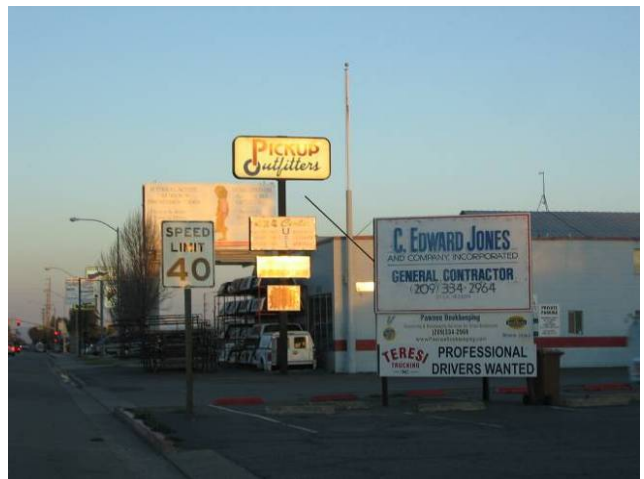


Photo B35

This commercial use suffers from graffiti and missing exterior tiles, which indicates a high crime area and requires an investment from the property owner and/or the City.



Photo B36

Commercial strip with multiple illegal signs, which indicates a lack of proper visibility from street due to inadequate parcel layout. Note also the overhead utility lines that add to the cluttered look. The problems in this area are beyond one property owner making improvements on one property; they require a coordinated effort between the public and private sectors.



Photo B37

Commercial use with a damaged parking area. Such conditions expose the property owner to liability for injury or damage, negatively affect surrounding properties, and reduce the “curb appeal” of a property. This property requires a substantial investment.



Photo B38

Obsolete commercial strip with no landscaping, and a large trash container and abandoned shopping cart in the public right-of-way. The problems in this area are beyond one property owner making improvements on one property; they require a coordinated effort between the public and private sectors.



Photo B39

Commercial use with a damaged parking area. Such conditions reduce the “curb appeal” of a property, expose the property owner to liability for injury or damage, and negatively affect surrounding properties. This property requires a substantial investment.



Photo B40

Property with inoperable vehicles, equipment and junk openly stored throughout the site. Barbed wire indicates high crime area. Such conditions reduce the “curb appeal” of a property, can lead to vermin infestation, and negatively affect surrounding properties as well.



Photo B41

Commercial use with an obsolete design (former residence) and a significantly damaged roof. This property requires a substantial investment.



Photo B42

Damaged curb, gutter, and sidewalk with no ADA curb cuts, which expose the City to liability for injury. Note also the lack of wheel stops on the parking lot to the right. This is an important safety precaution when parking abuts a public right-of-way.



Photo B43

Obsolete commercial property with minimal design elements, no landscaping, and an abandoned shopping cart in the public right-of-way. This property requires a substantial investment.



Photo B44

Commercial use with a damaged parking area. Such conditions reduce the “curb appeal” of a property, expose the property owner to liability for injury or damage, and negatively affect surrounding properties.



Photo B45

Residential property with a garage converted into a living space. Without proper permits and adequate construction, such conversions are substantial health and safety risks, particularly due to fire hazards.



Photo B46

Obsolete commercial building with minimal design elements, damaged exterior walls and trim and small parking lot. This property requires a substantial investment.



Photo B47

Obsolete commercial building with minimal design elements, illegal sign, no landscaping, and small and damaged parking lot. There are also boarded up windows, which create inadequate light and ventilation, and evidence of multiple graffiti removals. This property requires a substantial investment.



Photo B48

This is a vacant residence with boarded up windows that suggest a long-term vacancy.



Photo B49

Vacant dwelling unit in a multi-family residential building with address numbers spray-painted directly on the exterior stucco. Note also the lack of ADA access to the front doors.



Photo B50

Obsolete commercial building with minimal design elements (a façade on the outside of what appears to be a former residence), minimal signage, no landscaping, no setback, and no ADA access. This property requires a substantial investment.



Photo B51

Property with equipment and junk openly stored throughout the site. Building exterior has large areas of missing paint and potential wood rot. Such conditions reduce the “curb appeal” of a property and negatively affect surrounding properties as well.



Photo B52

This photo shows an incomplete right-of-way, missing sidewalk, damaged street, and overhead utility lines. Such conditions expose the City to liability for injury and damage.



Photo B53

Obsolete industrial use with no setback or landscaping. This view is from across the street from a residential area, which must also contend with heavy truck traffic, and various noises, vibrations, and odors. The problems in this area are beyond one property owner making improvements on one property; they require a coordinated effort between the public and private sectors.

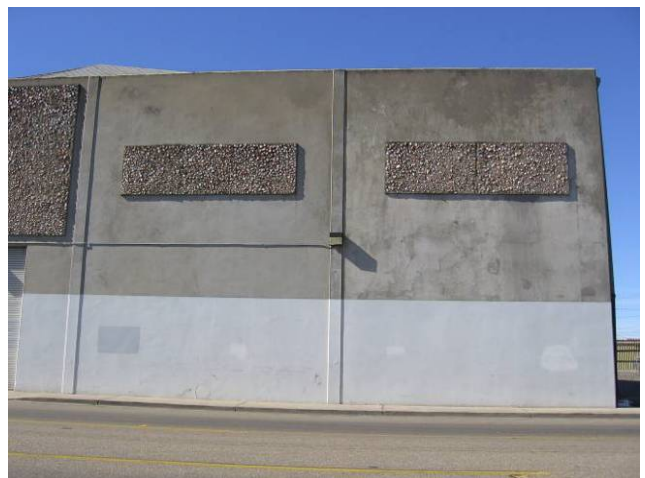


Photo B54

Small, obsolete commercial building with minimal design elements, no landscaping, and a small and damaged parking lot. It is also converted from a residential use or an office use, sits only a few feet from a very busy railroad track, and has no ADA access. This property requires a substantial investment.



Photo B55

This commercial use suffers from graffiti, which indicates a high crime area and requires an investment from the property owner and/or the City.



Photo B56

This photo shows a damaged curb, gutter, and street pavement. Such conditions expose the City to liability for injury and damage, literally affects the “curb appeal” of the area, and does not allow water to drain properly.



Photo B57

This small vacant lot is adjacent to a busy railroad track, a busy street with no grade separation crossing the tracks, and heavy industrial uses, all of which limit the desirability of the lot. The lack of adequate drainage, as evidenced by the ponding water, is also an attractive nuisance and often a breeding area for mosquitoes.



Photo B58

Industrial use with equipment and junk openly stored throughout the site. In addition, the building is rusted and damaged, and barbed wire indicates a high crime area. Such conditions reduce the “curb appeal” of a property and negatively affect surrounding properties as well. This property requires a substantial investment.



Photo B59

Damaged industrial building with a loading area and driveway that leads to a curb. Shipping crates are stored openly on the site. There is also no sidewalk or landscaping. This property requires a substantial investment.



Photo B60

This property suffers from an obsolete design, and a damaged roof with exposed wood. This property requires a substantial investment to rectify these problems.



Photo B61

Industrial use with equipment and junk openly stored throughout the site. Barbed wire indicates a high crime area. There is also no sidewalk or landscaping. Such conditions reduce the “curb appeal” of a property and negatively affect surrounding properties as well.



Photo B62

With no curb, gutter, sidewalk, or adequate drainage, water is allowed to pond, which reduces the “curb appeal” of the available vacant property and negatively affects surrounding properties. Such conditions require a significant investment by the City.



Photo B63

Empty lot surrounded by incompatible industrial and residential uses, is near a busy street, and near a railroad track, all of which reduce the desirability of the site. There is also no sidewalk and the site is being temporarily used by a lunch wagon.



Photo B64

Residential use adjacent to a commercial use without adequate buffers. Such a condition exposes the residence to noise, traffic, odors, and other issues and can negatively affect the value of both uses.



Photo B65

Obsolete commercial building with minimal design elements, no landscaping, exposed trash container, and an exposed mechanical unit held precariously in place. This property requires a substantial investment.



The problems described in this section are hindrances to the economic viability of the proposed Project Area. Considering the poor physical character of the proposed Project Area today, it is clear that the private sector, by itself, does not have the financial capability or authority to improve the area, or the motivation to invest in that area.

Together, the detrimental physical conditions in the proposed Project Area create an area where seemingly viable land has significant problems that substantially hinder its viable use. These problems are so wide-spread that even though they do not directly affect every parcel of land, virtually every parcel of land is indirectly affected by conditions that hinder viable uses.

8.3 INCOMPATIBLE USES THAT PREVENT ECONOMIC DEVELOPMENT

Section 33031(a) (3) of the CRL identifies one of the physical blight characteristics as adjacent or nearby uses that are incompatible with each other and prevent their development.

The piecemeal development described in the previous sections has not only helped make the proposed Project Area an area with obsolete uses, inadequate infrastructure, and poorly maintained properties, but has also helped create changing land use patterns and, in turn, incompatible land uses.

Incompatible uses essentially take two forms in the proposed Project Area: first, where conflicting land uses are located in close proximity to one another without adequate buffers; and second, where current uses are incompatible with the uses called for by the General Plan. Both types of incompatibility substantially impact the ability to improve the proposed Project Area and are extremely difficult to alleviate without redevelopment due to high costs and lack of authority. Overall, 745 properties (19% of all developed properties) are affected by these conditions. (See Appendix B for a list of parcels meeting this condition.)

Incompatibility Among Existing Uses

Examples of incompatible land uses exist in the proposed Project Area where a parcel has a use that is not compatible with its neighbors. These situations occur primarily because of the way the proposed Project Area has developed through the years. That is, as specific properties transitioned from

residential to commercial and industrial, adjacent parcels often remained residential.

Incompatible adjacent land uses were found throughout the proposed Project Area, but heavy concentrations were found in the following areas:

- Along Sacramento Street, from Kettleman Lane to the northern boundary of the proposed Project Area
- The entire length of Main Street
- Stockton Street, primarily from Tokay Avenue to the northern boundary of the proposed Project Area
- The entire length of Central Avenue
- The entire length of Cherokee Lane
- Lodi Avenue, primarily from Hutchins Street to Highway 99
- Pine Street, from Sacramento Street to Highway 99

This mix of land uses is incompatible because of conflicting traffic patterns, noise impacts, odors or other nuisances that tend to have attendant health and safety concerns. The result is an area that is conducive to neither residential nor business uses. This is a clear demonstration of how the economic development of properties is prevented due to the physical arrangement and layout of existing uses. (See Appendix B for a list of parcels meeting this condition of blight.)

Without redevelopment, the abatement of incompatible uses is highly unlikely, because owners, especially absentee owners, are unlikely to invest money in such properties in such a manner as to eliminate any incompatibilities by replacing one use for another, through screening, or through any other means. Consequently, the transformation of incompatible uses and irregular parcels into an area more easily developed for its intended uses is unfeasible and, therefore, is a substantial burden on the community.

Incompatibility Among Planned Uses

Incompatibility among planned uses relates to conditions where existing uses do not conform to the uses designated in the General Plan. As discussed above, incompatible, or non-conforming uses create circulation problems, an increased exposure to pollution, and a visual hodgepodge that does not promote private investment. When these characteristics are present it is obvious that economic development is slowed, if

not completely halted. (See Appendix B for a list of parcels meeting this condition of blight.)

Properties that are incompatible with planned uses also keep the City from fully implementing its General Plan. This, by definition, is a burden on the community as the City’s goals and objectives cannot be met with incompatible uses.

Non-conforming and incompatible uses have the most significant impact on the property values of residential uses. As shown in Table 7, the value per acre of incompatible and non-conforming single- and multi-family property is much lower than those that are compatible and conforming in the proposed Project Area. This demonstrates the negative effect that incompatible and non-conforming uses, which is a physical condition of blight, has on property values, which is an economic condition of blight.

TABLE 7
VALUE PER ACRE FOR
INCOMPATIBLE AND NON-CONFORMING RESIDENTIAL USES

TYPE	VALUE PER ACRE	DIFFERENCE
Conforming and Compatible	\$1,076,275	n/a
Non-conforming and Incompatible	\$733,819	-32%

Source: GRC Redevelopment Consultants, Inc.

Without redevelopment, the abatement of incompatible and non-conforming uses is highly unlikely, because owners, especially absentee owners, are unlikely to invest money in such properties in such a manner as to eliminate any incompatibilities by replacing one use with another, through screening, or through any other means.

Visually, incompatible or nonconforming uses act as a disincentive for investment, because it is neither the best environment nor the cheapest in which to develop a particular use. In other words, private development dollars flow to the points of least resistance. Unfortunately, there are many points of resistance in the proposed Project Area.

In a similar manner, a commercial lender is less likely to invest in an area of visual and functional hodgepodge than in an area that is prepared for commercial development. When uses are

mixed due to shifting needs and piecemeal development, they generally appear as an unattractive and jumbled mess to be avoided as quickly as possible. This clearly demonstrates how blight prevents future investment in an area and allows existing uses to stagnate.

Photos C1 – C14 are examples of incompatible and non-conforming uses in the proposed Project Area.

Photo C1

Residential use adjacent to a commercial use without adequate buffers. Such a condition exposes the residence to noise, traffic, odors, and other issues and can negatively affect the value of both uses.



Photo C2

Residential use adjacent to a commercial use without adequate buffers. Such a condition exposes the residence to noise, traffic, odors, and other issues and can negatively affect the value of both uses.



Photo C3

Residential use adjacent to a commercial use without adequate buffers. Such a condition exposes the residence to noise, traffic, odors, and other issues and can negatively affect the value of both uses.



Photo C4

Residential use adjacent to a commercial use without adequate buffers. Such a condition exposes the residence to noise, traffic, odors, and other issues and can negatively affect the value of both uses.



Photo C5

Residential use adjacent to a commercial use without adequate buffers. Such a condition exposes the residence to noise, traffic, odors, and other issues and can negatively affect the value of both uses.



Photo C6

Residential use adjacent to an industrial use without adequate buffers. Such a condition exposes the residence to noise, traffic, odors, and other issues and can negatively affect the value of both uses.



Photo C7

Residential use adjacent to an industrial use without adequate buffers. Such a condition exposes the residence to noise, traffic, odors, and other issues and can negatively affect the value of both uses.



Photo C8

Residential use adjacent to a commercial use without adequate buffers. Such a condition exposes the residence to noise, traffic, odors, and other issues and can negatively affect the value of both uses.



Photo C9

Residential use adjacent to a commercial use without adequate buffers. Such a condition exposes the residence to noise, traffic, odors, and other issues and can negatively affect the value of both uses.



Photo C10

Residential use adjacent to a commercial use without adequate buffers. Such a condition exposes the residence to noise, traffic, odors, and other issues and can negatively affect the value of both uses.



Photo C11

Residential use adjacent to a commercial use without adequate buffers. Such a condition exposes the residence to noise, traffic, odors, and other issues and can negatively affect the value of both uses.



Photo C12

Residential use adjacent to a commercial use without adequate buffers. Such a condition exposes the residence to noise, traffic, odors, and other issues and can negatively affect the value of both uses.



Photo C13

Residential use adjacent to a commercial use without adequate buffers. Such a condition exposes the residence to noise, traffic, odors, and other issues and can negatively affect the value of both uses.



Photo C14

Residential use adjacent to a commercial use without adequate buffers. Such a condition exposes the residence to noise, traffic, odors, and other issues and can negatively affect the value of both uses.



8.4 PARCELS OF IRREGULAR SIZE OR SHAPE

Section 33031(a) (4) of the CRL identifies as a blighting characteristic parcels that are subdivided into irregular shapes or sizes for proper usefulness that are in multiple ownerships.

Inadequate parcel shapes and sizes are a significant characteristic of blight in the proposed Project Area, mostly due to parcels that were sub-divided decades ago, and the location of railroad tracks. Irregular parcel shapes severely limit modernization and expansion of facilities, once parking, setback, and other requirements are met. They also create many of the problems discussed in the previous sections, such as outdoor storage, obsolescence, structures built on or near property lines, and other similar conditions.

Overall, 611 parcels (19% of all privately owned properties) were found to be of irregular shape and/or size.

Examples of irregular parcels include:

- Shallow lots along Sacramento, Main and Stockton Streets where some heavy industrial parcels are only 125 feet deep
- Residential lots north of Lockeford Avenue, east of Pleasant Avenue where parcels are only 45 feet wide
- Residential lots south of Lockeford Avenue, east of Washington Street where parcels have no frontage on a street and are accessed only by an alley
- Over 100 privately owned parcels that are less than 2,500 square feet in area

At only about 0.70 acre, the average commercial parcel in the proposed Project Area is extremely small. These small parcels also demonstrate the obsolescence of the proposed Project Area because few modern uses could be built on that size of a parcel today. The result is an extensive area with several old, small buildings with no room to expand and little incentive to modernize.

Photos D1 – D16 are examples of irregular parcels in the proposed Project Area.

Photo D1

Inadequately sized parcel and poor site layout forces shipping activities on the street. This results in poor circulation and increased safety risks for the workers. Note also the overhead utility lines.



Photo D2

Inadequately sized parcel and poor site layout results in a multi-family use with no covered parking and insufficient room to park without part of the vehicles sticking out into the public right-of-way.



Photo D3

Inadequately sized parcel and poor site layout results in poor circulation with vehicles double-parked and parked where the sidewalk should be.



Photo D4

Small, triangular-shaped parcel due to alignment of street and railroad right-of-way results in narrow building with limited function and a parking area with poor circulation. Property also suffers from being surrounded by telephone poles and overhead utility lines.



Photo D5

Inadequately sized parcel (due to street layout and railroad right-of-way), poor site layout, and obsolete structure forces merchandise to be displayed outside. This also results in poor parking circulation. In addition, the site does not have a sidewalk and is affected by overhead utility lines.



Photo D6

Inadequately sized parcel and poor site layout results in materials being stored outside and poor circulation with vehicles parked where the sidewalk should be.



Photo D7

Inadequately sized parcel and poor site layout results in a significant amount of equipment and junk stored openly on the narrow site. Note also the overhead utility lines.



Photo D8

Inadequately sized parcel and poor site layout results in poor parking circulation with vehicles forced to back out directly into oncoming traffic on a busy street.



Photo D9

Inadequately sized parcel and poor site layout results in poor parking circulation with vehicles forced to back out directly into oncoming traffic on a busy street. Note also the overhead utility lines.



Photo D10

Inadequately sized parcel and poor site layout results in poor parking circulation exemplified by this parking space that cannot be accessed due to the location of a light pole and a bollard. There are also no wheel stops protecting the building from vehicles in the parking lot.



Photo D11

Inadequately sized parcel and poor site layout results in poor parking circulation with vehicles forced to back out directly over a curb and into oncoming traffic on a State highway. Some of the parking spaces, as shown by this photo, can be accessed only by driving over a curb and directly onto the street. Note also the overhead utility lines and lack of landscaping, which add to the unattractiveness of the area.



Photo D12

Inadequately sized parcel and poor site layout results in poor parking circulation with a vehicle blocking the sidewalk.

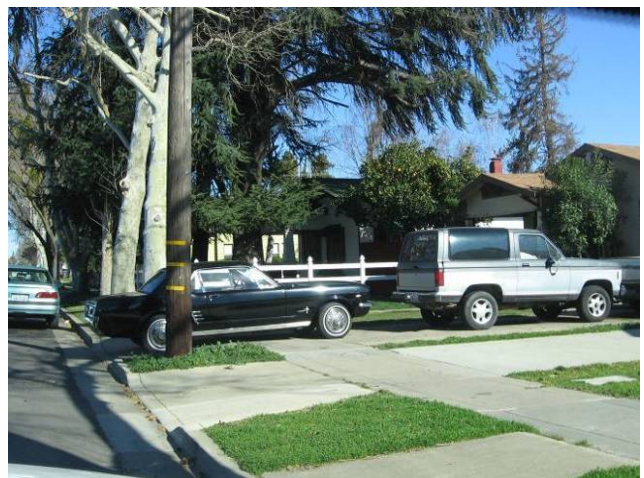


Photo D13

Inadequately sized parcel and poor site layout results in poor parking circulation with a vehicle parked where the sidewalk should be. Note also the overhead utility lines.



Photo D14

Inadequately sized parcel and poor site layout results in poor parking circulation with vehicles forced to back out directly into oncoming traffic. Note also the overhead utility lines and lack of landscaping, which add to the unattractiveness of the area.



Photo D15

Inadequately sized parcel and poor site layout results in poor parking circulation with vehicles double-parked.



Photo D16

Inadequately sized parcel and poor site layout results in poor parking circulation with vehicles forced to back out directly into oncoming traffic on a busy street.



8.5 DECLINING OR STAGNANT VALUES

The CRL identifies depreciated or stagnant property values as an indicator of economic blight. The proposed Project Area displays declining property values for residential development. Stagnant or depreciating property values contribute to generally impaired investments, in that a lack of expected returns on property often results in deferred maintenance and lack of reinvestment. This in turn contributes to further declines in property values. If the decline is significant, then the value of the owner's investment will decline.

Declining or Stagnant Property Sales Values

Depreciated values investments can be measured in a number of ways. Property sales values are probably the most direct measure, but only if there are sufficient sales to establish a clear trend in property values. There are sufficient property sales records for existing single family residential properties in the existing Project Area. However, there are very few sales reported as to non-residential properties.

Reported sales values for single family homes built before 1997 show a 33% increase between 1998 and 2007. However, when compared on a year-over-year basis, inflation adjusted values declined between 1998 and 2000, rose between 2001 and 2005, and then began declining in 2006. The value of single family homes, when adjusted for inflation, is generally declining in the proposed Project Area.

Table 8
Lodi Redevelopment Plan

Average Per Square Foot Single Family Sales Values
1998-2007

Year	Sales Value per Square Foot	Year-over-Year Trend	Inflation Adjusted per Square Foot Sales Values	Year-over-Year Trend
1998	71.86		181.57	
1999	75.74	5.41%	168.92	-6.96%
2000	81.79	7.98%	145.51	-13.86%
2001	103.99	27.14%	164.08	12.76%
2002	135.48	30.28%	204.31	24.52%
2003	162.73	20.12%	227.55	11.37%
2004	199.35	22.51%	239.98	5.46%
2005	264.34	32.60%	263.54	9.82%
2006	267.38	1.15%	255.27	-3.14%
2007	241.58	-9.65%	241.58	-5.36%

Source: GRC Redevelopment Consultants based on CD Data San Joaquin County Assessed Valuation files for 2007, inflation adjustment factors from S&P/Case-Shiller Home Price Indices, 2007.

The low rate of non-residential property turnover and lack of reinvestment in the remaining blighted area is caused by a number of interrelated factors. First, the properties in question are at a competitive disadvantage when compared to other similar properties serving the same market area, or the properties are not able to attract investment dollars because return on investment is too low. Low return on investment can result from the costs of new investment and the constraints placed on new development being too high compared to potential returns on the investment. Potential investment dollars will flow to sites with fewer constraints, and possibly outside the local market.

Property Re-Investment Trends

Examining property value trends over a period of time shows a pattern for reinvestment rates in a given area. In analyzing the proposed Project Area, a lack of reinvestment signifies economic blight and makes the area a good candidate for redevelopment.

Of the 1,278 parcels in the proposed Project Area, a smaller set met the standards used to evaluate their assessed property value over time. The required standards for evaluating

assessed property value between the years 2003 and 2006 are three-fold: 1) that the parcel had a value greater than zero in 2003; 2) that the parcel existed in both 2003 and 2006; and 3) that the parcel did not undergo a sale between 2003 and 2006 (as a sale inaccurately inflates the value of property when looking at reinvestment rates).

Parcels can be placed into five categories when evaluating reinvestment rates. Parcels can decrease in value; they can increase below the statutory assessed value inflation rate of 2% per annum; they can increase at the statutory assessed inflation rate of 2% per annum; they can increase slightly above the statutory assessed inflation rate, signifying modest reinvestment; or they can increase in value by 20% or greater¹⁰, signifying significant reinvestment. A parcel that increases in assessed value either below the statutory assessed inflation rate of 2% or at it does not show any real growth in value.

Table 9
Lodi Community Improvement Project

Property Re-Investment Trends

Assessed Valuation Trend	Land Use		
	Commercial	Industrial	Residential
Decrease or No Change	6%	13%	1%
Increased at Prop. 13 2% Inflator Rate	82%	72%	87%
Increased at Above 2% Inflator Rate	5%	7%	2%
Increased More Than 20%	8%	8%	10%

Source: GRC Redevelopment Consultants, calculated from assessed valuation data reported for 2003 and 2006.

Of the parcels that were under the same ownership in 2003 and 2006, the vast majority saw an assessed valuation increase 2% per annum, which is consistent with property that experiences no or very few improvements. Properties that decreased in assessed valuation, or did not change during the four-year evaluation period ranged from 1% for residential development to 13% for industrial uses. Between five and seven percent of properties in the Project Area saw some new investment, but not a significant amount. Only between eight

¹⁰ 20% value is an estimated threshold indicate significant investment of more than \$15,000 to \$20,000 in a property.

and ten percent of commercial, residential and industrial properties in the Project Area saw a significant increase in valuation due to rehabilitation, new investment or modernization.

In other words, there is a significant lack of new investment in existing properties in the proposed project area, and the highest rate of property valuation growth is through the sale of existing properties.

8.6 IMPAIRED PROPERTY VALUES, DUE IN SIGNIFICANT PART TO HAZARDOUS WASTE

Costs associated with known areas of contamination are extremely high and have been discussed in Chapter 7.1, Buildings that are Unsafe or Unhealthy in Which to Live or Work.

8.7 VACANCIES, LOW LEASE RATES, AND ABANDONED BUILDINGS

There are 94 vacant commercial or industrial units in the proposed Project Area. Vacant businesses illustrate the complex nature of blight. Poor physical conditions lead to decreased values and sales, which, in turn, lead to poor economic conditions. Vacancies not only give the area a run-down look and affect neighboring properties, but they do not generate sales tax revenue, frequently lower surrounding property values, increase crime and the risk of fire, and pose hazards to children.¹¹ These are all factors that substantially hinder or prevent viable uses.

Empty buildings exhibiting characteristics of neglect and abandonment such as broken windows, abandoned garbage, or other such indications of neglect, are typically regarded as attractive nuisances and neighborhood burdens and often attract transients who commit crimes related to property, intoxication, and illegal occupancy. Additionally, the standard concept of "The Broken Window Effect", which is widely accepted in professional planning literature, points strongly to a very high degree of correlation between apparent building abandonment and crime.¹²

¹¹ Kraut, David T., "Hanging Out the No Vacancy Sign: Eliminating the Blight of Vacant Buildings from Urban Areas", New York University Law Review, New York, New York, October, 1999.

¹² Wilson, James O. and Kelling, George L., "Broken Windows", *The Atlantic*, Boston, Mass., March, 1982.

Successful implementation of the redevelopment program will address the vacancies by providing incentives to attract new businesses, or facilitating parcel assembly, which could create properties that are viable in today's market.

See Photos E1 – E42 for examples of vacancies in the proposed Project Area.

Photo E1

Unmaintained vacant use, which can lower the value of that property and others nearby as well.



Photo E2

Unmaintained vacant commercial use, which can lower the value of that property and others nearby as well.



Photo E3

Unmaintained vacant commercial use, which can lower the value of that property and others nearby as well.



Photo E4

Unmaintained vacant residential use, which can lower the value of that property and others nearby as well.



Photo E5

Unmaintained vacant residential use, which can lower the value of that property and others nearby as well.



Photo E6

Vacant commercial use, which can lower the value of that property and others nearby as well.



Photo E7

Vacant residential use, which can lower the value of that property and others nearby as well.



Photo E8

Unmaintained vacant residential use, which can lower the value of that property and others nearby as well.



Photo E9

Unmaintained vacant commercial use, which can lower the value of that property and others nearby as well.



Photo E10

Unmaintained vacant commercial use, which can lower the value of that property and others nearby as well.



Photo E11

Unmaintained commercial structure, which can lower the value of that property and others nearby as well.



Photo E12

Vacant commercial use, which can lower the value of that property and others nearby as well.



Photo E13

Unmaintained vacant commercial use, which can lower the value of that property and others nearby as well.



Photo E14

Unmaintained vacant commercial use, which can lower the value of that property and others nearby as well.



Photo E15

Unmaintained vacant commercial use, which can lower the value of that property and others nearby as well.



Photo E16

Vacant commercial use, which can lower the value of that property and others nearby as well.



Photo E17

Vacant industrial use, which can lower the value of that property and others nearby as well.

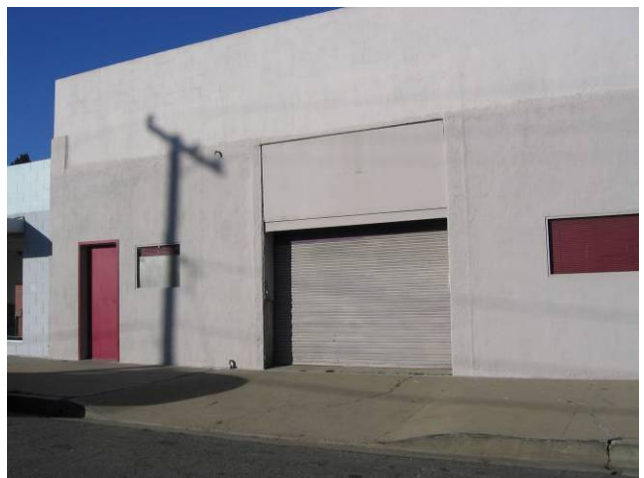


Photo E18

Vacant commercial use, which can lower the value of that property and others nearby as well.



Photo E19

Vacant commercial use, which can lower the value of that property and others nearby as well.



Photo E20

Vacant industrial use, which can lower the value of that property and others nearby as well.



Photo E21

Vacant industrial use, which can lower the value of that property and others nearby as well.



Photo E22

Vacant industrial use, which can lower the value of that property and others nearby as well.



Photo E23

Vacant industrial use, which can lower the value of that property and others nearby as well.



Photo E24

Unmaintained vacant commercial use, which can lower the value of that property and others nearby as well.



Photo E25

Vacant commercial use, which can lower the value of that property and others nearby as well.



Photo E26

Vacant commercial use, which can lower the value of that property and others nearby as well.



Photo E27

Vacant commercial use, which can lower the value of that property and others nearby as well.



Photo E28

Vacant industrial use, which can lower the value of that property and others nearby as well.



Photo E29

Vacant industrial use, which can lower the value of that property and others nearby as well.



Photo E30

Vacant industrial use, which can lower the value of that property and others nearby as well.



Photo E31

Vacant commercial use, which can lower the value of that property and others nearby as well.



Photo E32

Unmaintained vacant residential use, which can lower the value of that property and others nearby as well.



Photo E33

Vacant commercial use, which can lower the value of that property and others nearby as well.



Photo E34

Unmaintained vacant commercial use, which can lower the value of that property and others nearby as well.



Photo E35

Vacant residential use, which can lower the value of that property and others nearby as well.



Photo E36

Vacant residential use, which can lower the value of that property and others nearby as well.



Photo E37

Unmaintained vacant commercial use, which can lower the value of that property and others nearby as well.



Photo E38

Vacant commercial use, which can lower the value of that property and others nearby as well.



Photo E39

Vacant industrial use, which can lower the value of that property and others nearby as well.



Photo E40

Vacant industrial use, which can lower the value of that property and others nearby as well.



8.8 HIGH CRIME RATE

The CRL provides that one of the conditions of economic blight is a high crime rate that constitutes a serious threat to the public safety and welfare an economic condition that causes blight.

According to evidence presented by the Lodi Police Department, the Project Area has an exceptionally high rate of crime when compared to the balance of the City.

The central portion of the Project Area bounded, by Lockeford Street on the north, Cherokee Lane on the east, Kettleman Lane on the south, the railroad tracks on the west, has the

City's highest concentration of major crimes. For instance, there have been five homicides in the City since 2005, four of which were in the Project Area, and the fifth within two blocks of the Project Area.

Of all calls for service received by the Lodi Police Department, over half (54%) originated in the proposed Project Area over the 2005 through 2007 period. In a like manner, approximately 54% of the City's major (Part 1)¹³ crimes occurred in the proposed Project Area.

At the same time, only 25% of the City's population lives in the proposed Project Area. The proposed Project Area's major crime rate was about 107 per thousand Part 1 cases filed in 2007, while the rate in the balance of the City was 30 per thousand. In other words, in terms of Part 1 crimes, the proposed Project Area's crime rate is over three times higher than that of the balance of the City. This relationship remains true for all calls for police services, at over three times higher in the proposed Project Area than in the balance of the City.

The higher crime rate in the proposed Project Area places a significant burden on those who live or work in the proposed Project Area when compared to the City as a whole. Also, the higher crime rate in the proposed Project Area means that the Police Department is forced to devote a significantly higher percentage of its resources in the proposed Project Area than elsewhere in the City.

¹³ Source: Lodi Police Department, David J. Main, Interim Police Chief. February 13, 2008. Part 1 crimes include assault, auto theft, burglary, homicide, rape, robbery and larceny.

Table 10
Lodi Redevelopment Project

City-Wide and Project Area Crime Rate Comparison
2003-2005

Types of Incident	2005 Incidents		2006 Incidents		2007 Incidents	
	Number	per Thousand	Number	per Thousand	Number	per Thousand
City-Wide						
Calls for Service	55,688	898	53,083	843	53,911	856
Reported Part One Crimes	4,754	77	4,411	70	4,341	69
Part 1 Cases Filed	3,339	54	3,389	54	3,096	49
Project Area						
Calls for Service	29,765	1,984	29,020	1,935	28,813	1,801
Reported Part One Crimes	2,473	165	2,375	158	2,389	149
Part 1 Cases Filed	1,765	118	1,844	123	1,707	107
Outside Project Area						
Calls for Service	25,923	552	24,063	501	25,098	534
Reported Part One Crimes	2,281	49	2,036	42	1,952	42
Part 1 Cases Filed	1,574	33	1,545	32	1,389	30

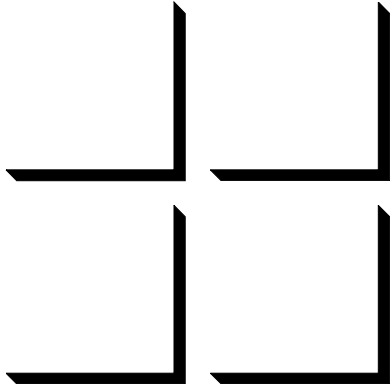
Source: GRC Redevelopment Consultants, 2008. Based on data provided by Lodi Police Department (2008) and State of California Demographic Research Unit, Report E-5 (July 2007)

Gang-related activity is centered in the proposed Project Area, according to the Police Department. Other policing issues include lack of adequate visibility into alleys, traffic blockages resulting from lack of adequate access across the railroad tracks, and lack of a sub-station in the central part of the proposed Project Area.

GRC GRC GRC

This page intentionally left blank

GRC GRC GRC



9.0 SUMMARY OF EXISTING CONDITIONS IN THE PROPOSED PROJECT AREA

Although required to exhibit only one form of physical blight and one form of economic blight, the proposed Project Area was observed to be affected by four categories of physical blight and three categories of economic blight. The matrix below lists the conditions of blight as required by CRL Section 33352(b). A list of each condition, by parcel, is included in Appendix B

<i>TYPE OF BLIGHT DEFINED BY THE CRL</i>	<i>SIGNIFICANT IN THE PROJECT AREA?</i>	<i>EXAMPLES</i>	<i>CONCLUSION</i>
Physical - 33031 (a) (1)	Yes	Severe dilapidation; hazardous materials	Results in buildings that are unsafe or unhealthy
Physical - 33031 (a) (2)	Yes	Deterioration; obsolescence; absentee ownership; nearly \$128 million in infrastructure needs; outdoor storage, other property maintenance issues	Results in properties that require a significant investment, which hinders viable uses
Physical - 33031 (a) (3)	Yes	Incompatible adjacent land uses; non-conforming uses	Results in land use patterns that prevent development
Physical - 33031 (a) (4)	Yes	Antiquated parcelization; parcels too small for modern commercial uses; odd-shaped parcel remnants from street and railroad rights-of-way	Results in impaired development because viable uses cannot exist on irregular parcels when setbacks, parking, and other requirements are met

TYPE OF BLIGHT DEFINED BY THE CRL	SIGNIFICANT IN THE PROJECT AREA?	EXAMPLES	CONCLUSION
Economic - 33031 (b) (1)	Yes	Home sales values down when adjusted for inflation; despite age of most buildings, only about 9% of properties saw significant reinvestment	Results in economic problems that affect the entire Project Area
Economic - 33031 (b) (2)	Yes	City's portion of hazardous cleanup is over \$46 million; removal of asbestos and lead paint could cost over \$18 million	Results in higher costs to taxpayers and/or lower services unless financial programs such as redevelopment are utilized
Economic - 33031 (b) (3)	Yes	Nearly 100 vacant commercial or industrial units	Results in run-down look and lower property values throughout the Project Area
Economic - 33031 (b) (6)	Yes	80% of City homicides in Project Area; Over half of all major crimes in Project Area	Results in reduced quality of life due to safety risks and lower property values throughout the Project Area

The list below is a summary of the physical and economic conditions in the proposed Project Area, as described in Chapter 7.0.

- There are five known contaminated groundwater plumes which underling 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 old, with 858 structures over 75 years old and 87 over 100 years old

- Almost 990 residential properties are owned by absentee owners
- There are nearly twice as many absentee-owned residential properties than in the remainder of the City
- 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

Overall, 3,405 of the 4,108 properties in the proposed Project Area (83%) show at least one characteristic of physical blight (see Figure 5). 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 (see Figure 6).

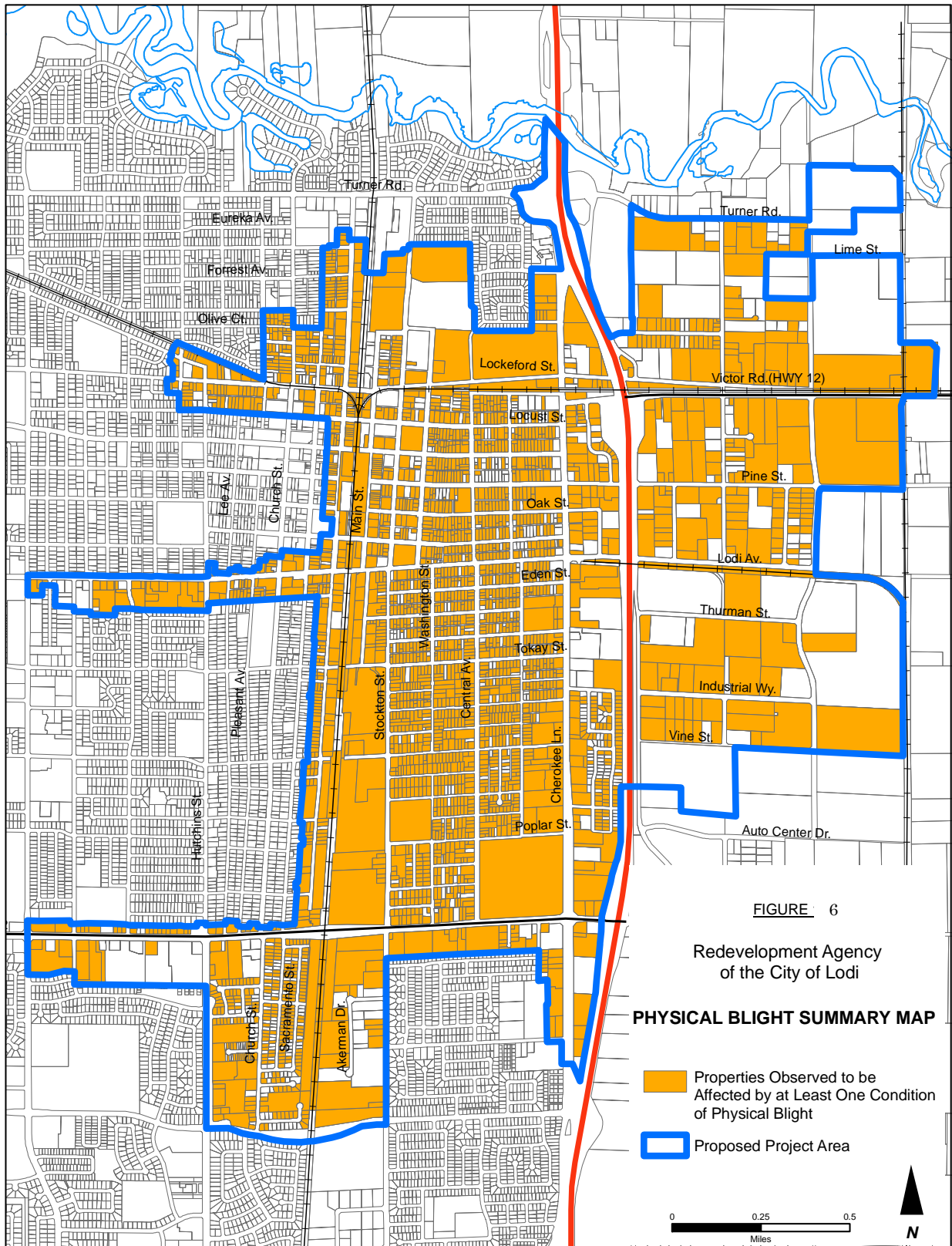


FIGURE 6
Redevelopment Agency
of the City of Lodi
PHYSICAL BLIGHT SUMMARY MAP

- Properties Observed to be Affected by at Least One Condition of Physical Blight
- Proposed Project Area

0 0.25 0.5
Miles



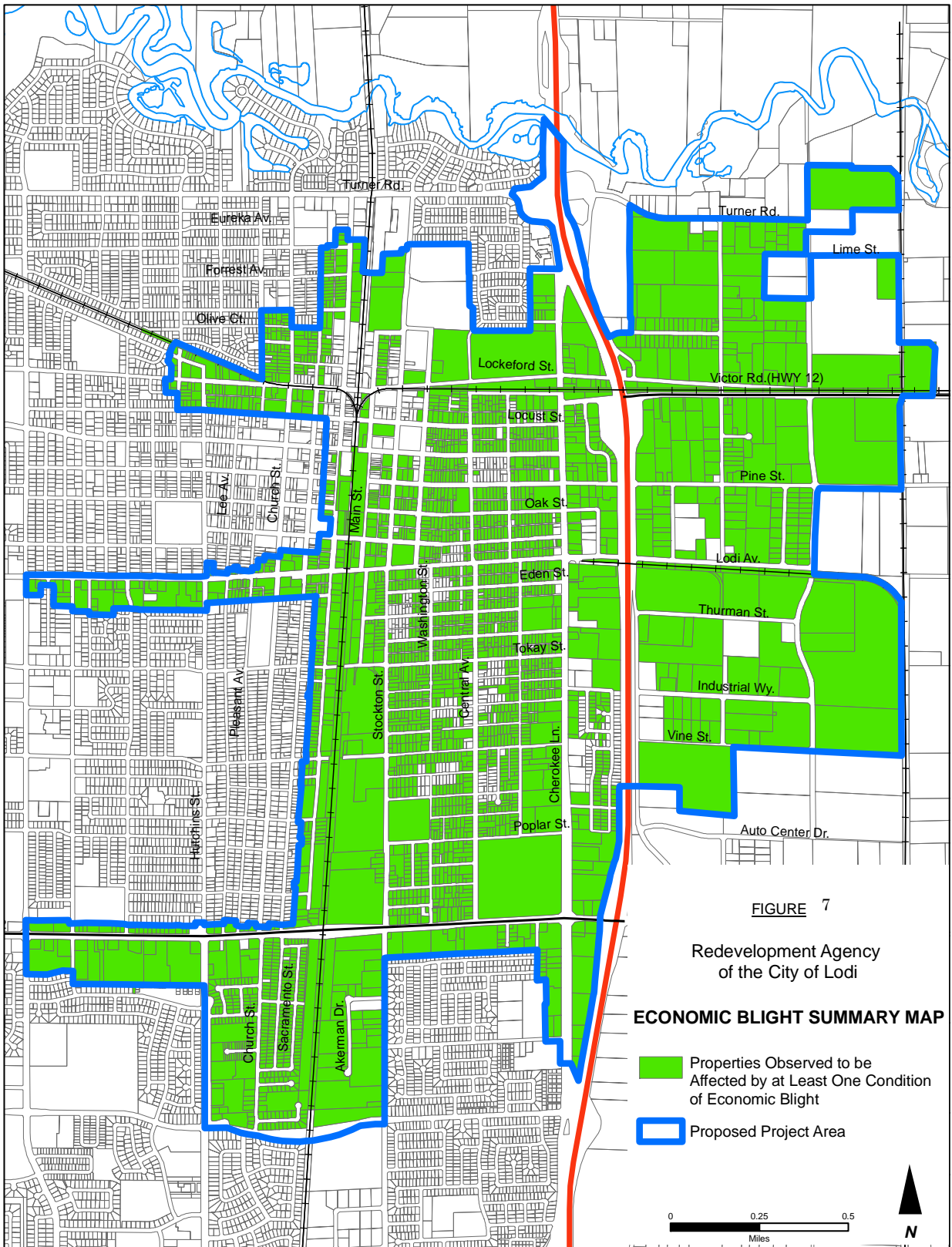


FIGURE 7

Redevelopment Agency
of the City of Lodi

ECONOMIC BLIGHT SUMMARY MAP

- Properties Observed to be Affected by at Least One Condition of Economic Blight
- Proposed Project Area

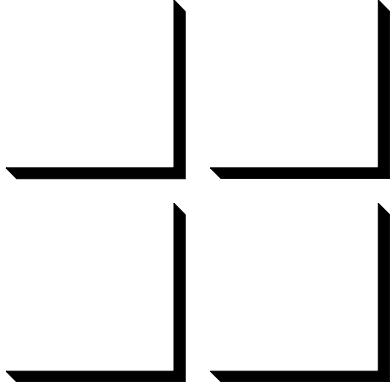
0 0.25 0.5
Miles



GRC | GRC | GRC

This page intentionally left blank

GRC | GRC | GRC



10.0 PROPERTIES NECESSARY FOR EFFECTIVE REDEVELOPMENT

Because not every parcel in a redevelopment area exhibits characteristics of blight, it is important to address those properties that are not blighted. The CRL recognizes that parcel and building conditions in a given area of a community are likely to vary. Such variations may be based on the type of land use, lot patterns, historical development patterns, the financial resources of past or present property owners, the competitiveness of individual businesses or uses, and a variety of other factors too numerous to mention. By recognizing the existence of such variation, the CRL effectively acknowledges the possibility that un-blighted properties may be mixed in among, or be located in close proximity to, blighted areas. Other land necessary for effective redevelopment also includes properties that would be necessary for the implementation of low- or moderate-income housing programs, or for the relocation of residents or businesses.

The CRL addresses the potential mixture of blighted and un-blighted properties by declaring a redevelopment project area need not be restricted to blighted properties only, so long as blight conditions predominate and injuriously affect the entire area. Moreover, the CRL specifically permits the inclusion of non-blighted properties in a redevelopment project area if the inclusion of those properties is found necessary for the effective redevelopment of the area of which they are a part. Section 33321 of the CRL notes:

A project area, "...need not be restricted to buildings, improvements, or lands which are detrimental or inimical to the public health, safety, or welfare, but may consist of an area in which such conditions predominate and injuriously affect the entire area. [A project area] may include lands, buildings, or improvements which are not

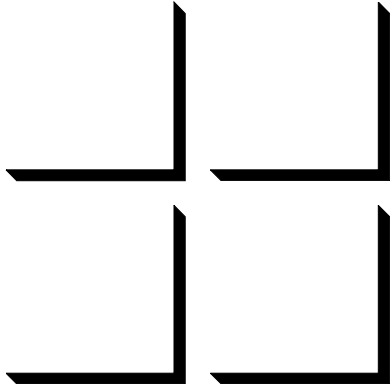
detrimental to the public health, safety or welfare, but whose inclusion is found necessary for the effective redevelopment of the area of which they are a part. Each such area included under this section shall be necessary for effective redevelopment and shall not be included for the purpose of obtaining the allocation of tax increment revenue from such area pursuant to Section 33670 without other substantial justification for its inclusion.”

Lacking a more precise definition of what is meant by “necessary for effective redevelopment” in either contiguous or noncontiguous portions of a redevelopment area, the Agency and City Council must also seek to determine whether there is substantial justification for the inclusion of any areas of the proposed Project Area that are either not blighted or may not be sufficiently affected by conditions of blight to qualify as blighted under the CRL.

The non-blighted properties have been included in the proposed Project Area because they are part of a commercial block or residential neighborhood that shows a predominance of physical and economic blight. In essence, while standard and well-maintained, these parcels are substantially surrounded by otherwise blighted parcels. Leaving such parcels out of the proposed Project Area would create a “Swiss cheese” effect, with many small holes in which the Agency cannot be active. The administration of the Redevelopment Plan would be much more difficult. Not including such integral parcels would also limit the Agency’s ability to undertake comprehensive programs that depend on coordinating the future development of numerous parcels.

Specifically, the proposed Project Area includes various parcels that are in good condition and surrounded by blighted properties and/or are negatively influenced by nearby blight in the proposed Project Area. These individual properties are interspersed throughout the proposed Project Area.

Due to the widespread nature of the blight characteristics and the inadequate public improvements in the proposed Project Area, it is impractical to eliminate individual un-blighted parcels or small groups of un-blighted properties when these same properties are otherwise affected by the causative factors of blight that affect other nearby parcels in the proposed Project Area. These un-blighted properties, then, have been left in the proposed Project Area because they would benefit from the improvements proposed by the Agency. Removing un-blighted properties also would ultimately reduce the effectiveness of the overall redevelopment effort by creating a piecemeal redevelopment pattern.



11.0 THE “FIVE-PART TEST”

As described in Chapter 2.0, there are five basic requirements that must be satisfied in order for territory to be included in a redevelopment project. This Chapter will discuss each requirement relative to the conditions in the proposed Project Area.

1. *The area must be predominately urbanized.*

As shown in Chapter 5.0, the proposed Project Area is 87% urbanized.

2. *The area must have at least one condition of physical blight and at least one condition of economic blight, or be necessary for the effective redevelopment of the area.*

The proposed Project Area exhibits and is characterized by four conditions of physical blight and three conditions of economic blight. In addition, there are various properties that are included because they are necessary for effective redevelopment (see previous Chapter).

3. *The blight must cause a lack of proper utilization of the area.*

The effects of blight are many and spread out over the majority of the proposed Project Area. For example, various characteristics of physical blight are indicative of underlying economic blight. Based on conditions in the proposed Project Area, it is apparent that each contributes to, and reinforces the presence, of the other.

Detrimental physical conditions, such as deteriorated buildings, hinder economic viability because they contribute to lower lease rates and the inability of property owners to invest in the area. As the amount of deferred investment accrues, the level of deterioration increases. Eventually, the level of

deterioration begins to affect the value of the property. As discussed in Chapter 7.0, properties with various conditions of blight were found to be assessed lower than those in good condition. Blighted properties also tend to reduce the value of adjacent buildings, which further limits the proper utilization of the proposed Project Area.

Conversely, conditions of economic blight give rise to physical blight. A building that is vacant is less likely to be maintained by the owner, because his/her investment in the property might have poor returns or no return at all. In businesses where lease rates are indexed to sales, declining sales could eventually lead to abnormally low lease rates. Similarly, if sales decline to the point of business failure, that failure could put downward pressure on future lease rates at that location.

As demonstrated throughout Chapter 8.0, the proposed Project Area suffers from contamination, deteriorated buildings, commercial obsolescence, incompatible and nonconforming uses, irregular parcels, depreciated values, and vacancies. These are all characteristics that inhibit the proper usefulness of the proposed Project Area.

4. *The improper utilization must be a serious physical and economic burden on the community.*

There are two main characteristic of blight in the proposed Project Area: groundwater contamination and the many conditions that limit the viable use of properties. Both physical and economic problems arise when a building or site is obsolete, needs maintenance, and/or is located adjacent to in incompatible use because these buildings and sites are at an economic disadvantage compared to others. Such conditions make properties in the proposed Project Area uncompetitive in the marketplace.

The economic impact of, say, small or irregular lots is that a use or building that does not meet modern development standards is at an economic disadvantage to one that does. Stated another way, people are more likely to shop at a store or business where parking is readily available and convenient, and avoid businesses where there is little or no chance of finding adequate parking nearby or where access is hard to find or even dangerous. If enough customers are dissuaded by such conditions, and the conditions continue unchanged, eventually a business vacancy will occur or a low-end use will occupy the space. While one business vacancy or low-end use is not economic blight, if unfavorable conditions are repeated

often enough in any one area, more will result, and the threshold for economic blight will be crossed.

Residential properties also suffer from small lots with smaller homes, no covered parking, and other problems. Lotting patterns also serve to discourage new commercial development, the rehabilitation of older shopping centers, or the expansion of existing homes. If current lot sizes and shapes are not compatible with modern standards and market conditions, and the private market is unable to assemble adequate lots, viable new uses will not locate in the area, no matter what is called for in the General Plan and zoning ordinance.

This economic disadvantage becomes worse when other forms of blight are combined. For example, the degree of incompatibility, both in terms of existing land uses and planned land uses, is a contributing factor in the lack of investment in the proposed Project Area. If investors continue to shy away from the area, values will continue to decline, retail sales will continue to decline, vacancies will increase, and building deterioration will worsen.

In addition the estimated cost to improve just the infrastructure in the proposed Project Area is over \$148,000,000. Add to that over \$46,000,000 that the City must pay for groundwater cleanup and it is clear how, with just two examples, the blight in the proposed Project Area is a substantial burden on the community.

5. *The serious physical and economic burden cannot be reversed by private enterprise acting alone, by the public sector acting alone, or by both acting together without the assistance of redevelopment.*

The physical and economic conditions in the proposed Project Area have been deteriorating for many years. The problems in the proposed Project Area, as described in Chapter 8.0 and summarized in Chapter 9.0, are not issues that suddenly appeared or are just a small valley in the normal “ups and downs” of a community. They are problems that began decades ago and cannot be fixed by simple solutions like a new coat of paint.

Clearly, the private sector does not have the ability to consolidate parcels into those that are better-suited for today’s marketplace. The private sector also does not have the desire to invest substantial amounts of money into an area with so

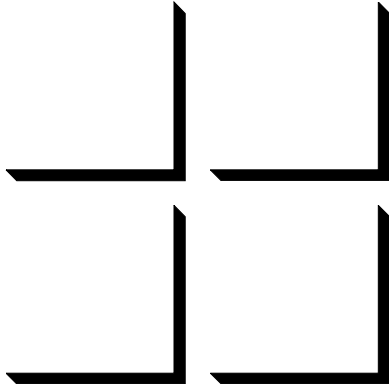
many characteristics of blight. Doing so just does not make economic sense.

Similarly, the public sector does not have the funds available to redevelop the proposed Project Area. With over \$148,000,000 needed in public improvements alone, it is highly unlikely that the City could also fund the incentives necessary to stimulate interest in the area.

Examples have been provided throughout this Report of how much lower in assessed value blighted properties are in the proposed Project Area compared to similar non-blighted properties. The City, the County, and other affected taxing agencies all share the financial burden each and every year in lost income from the blighted properties.

This shortfall places a burden on other properties in the community by having to, in essence, provide a subsidy to the blighted parcels. At the same time, many of these blighted properties generate little in property tax revenue while requiring more in the way of services, particularly public safety. This is a tremendous disadvantage to the property owners in the proposed Project Area as well as the City, County, and other taxing agencies and demonstrates the overwhelming costs due to extensive blight in the proposed Project Area.

It is situations like this for which redevelopment was intended. Without burdening an already-burdened community with additional taxes, redevelopment can cause the slow, but steady, improvement of the area. Redevelopment will not pay every penny needed in the area, nor should it. Rather, it can help bridge the gap of what is needed and what is available.



12.0 DESCRIPTION OF THE SPECIFIC PROJECTS PROPOSED BY THE AGENCY AND DESCRIPTION OF HOW THESE PROJECTS WILL IMPROVE OR ALLEVIATE BLIGHT AND WHY BLIGHT CANNOT BE ELIMINATED WITHOUT REDEVELOPMENT OR TAX INCREMENT FINANCING

CRL Section 33352(a) requires a description of the specific projects proposed by the Agency and a description of how these projects will improve or alleviate the blight outlined in this Report. CRL Section 33352(d) requires an explanation of why the elimination of blight and the redevelopment of the area cannot reasonably be expected to be accomplished by private enterprise acting alone or by the Agency's use of financing alternatives other than tax increment.

The following will discuss the improvements needed in the Project Area, and why redevelopment and tax increment are needed to eliminate blight.

12.1 REDEVELOPMENT PROGRAMS

To address the many conditions of blight noted in Chapter 8.0 and summarized in Chapter 9.0, the Agency anticipates the use of a number of Redevelopment Programs. These are described in greater detail in Chapter 14.0.

The programs will be designed to address the most significant blight in the Project Area. It is believed as blight is reduced, new private sector investment will occur in the Project Area and lead to the further removal of blight. Therefore, the Agency's program of redevelopment will serve as a catalyst to remove blighting conditions and spur the preservation, improvement, and creation of housing by new private investment.

As part of the Redevelopment Program, the Agency may encourage new development in the Project Area by assisting with site preparation, offsite improvements, disposition of property, and hazardous waste remediation as well as relocation assistance to existing property owners and tenants if ever needed. This part of the Redevelopment Program would address a variety of physical blighting conditions, including deterioration and dilapidation, buildings of inadequate size, incompatible land uses, lots of irregular shape and size, and commercial obsolescence. The program would also assist in the alleviation of economic blighting conditions, such as stagnant property values in parts of the Project Area. Also as part of this program, the Agency may assist with rehabilitation efforts for existing residential, commercial, and industrial uses.

Much of the commercial portions in the Project Area are older and show signs of significant obsolescence. Therefore, a major part of the Agency's Redevelopment Program will be to provide funds for revitalization activities. Such activities could include funding programs for façade improvements, modernization, expansion, new signage, seismic retrofitting, toxic remediation, building repair, historic preservation, and rehabilitation.

All activities will be designed to revitalize the Project Area. The following describes in greater detail the major programs that the Agency intends to undertake.

Commercial Corridor Improvement Program

The Agency intends to fund improvements designed to strengthen the major commercial corridors in the proposed Project Area. These projects are either directly related to the alleviation of blight, such as commercial rehabilitation assistance, or are needed in order set the economic environment in which private sector reinvestment can occur.

Improvements would focus on the following major commercial corridors in the City, including:

- Lodi Avenue
- Cherokee Lane
- Kettleman Lane
- Lockeford Street
- Pine Street
- Victor Road
- Central Avenue

Improvements that are needed along these major commercial corridors include:

- Water, sewer and storm drains
- Undergrounding of utilities
- Pedestrian improvements
- Streetscape improvements
- The reconstruction of streets
- Billboard removal; and
- Improved signage

Water and sewer improvements are necessary to maintain the health and safety of all City residents and employees. Such improvements could include reconstruction of sewer mains and various upgrades to the water and storm drain systems as part of the upgrade to the City's major arterial streets. The maps at the end of this section show the location of water, storm drain and wastewater system deficiencies. There are water pipes that are six inches or smaller that require replacement to improve pressure and flow in the system. The maps also show that there are storm inlet structures and storm drain pipes that are either of insufficient size that need to be installed or replaced. Inadequate water, sewer, and storm drain lines are a deterrent to investment. Therefore, it is critical that these systems be improved.

Traffic and circulation problems have affected the proposed Project Area for a number of years, so it is important to upgrade dilapidated streets and make modifications that are needed to eliminate safety issues. This will also establish an environment for new private sector investment. The map at the end of this section shows the location of streets that have a pavement condition index of less than 50 and require replacement.

Streetscape improvements along the major corridors of the City could include the installation of street trees, landscaped medians, entry way signs, new signage and the removal of billboards. All of these improvements will be designed to upgrade the appearance of the proposed Project Area.

Agency assistance with these types of improvements will help foster additional commercial development in the proposed Project Area. Each of these types of improvements establishes an environment in which private sector investment can occur, which leads to further blight alleviation.

Also as a part of the Commercial Corridor Improvement Program, the Agency intends to implement a commercial rehabilitation program. This program would focus on providing loans and grants for the rehabilitation of existing commercial and industrial buildings. As discussed in Chapter 8, over 900 buildings in the proposed Project Area suffer from some form of deterioration and dilapidation. The commercial rehabilitation program is designed to reverse conditions of blight for those structures.

Neighborhood Improvement Program

The Agency intends to fund improvements designed to upgrade and strengthen the residential areas of the proposed Project Area. Improvements to neighborhoods are proposed to include:

- Water, sewer and storm drains
- Undergrounding of utilities
- Pedestrian improvements
- Soundwalls
- Alley improvements
- Sidewalk, curb and gutters

As with the commercial corridors of the City, the water, sewer and storm drain systems are aging, obsolete and inadequate and need to be upgraded in various neighborhoods throughout the proposed Project Area. The maps at the end of this section show the location of these deficiencies.

A number of pedestrian improvements are needed, including better bicycle access, street signs, street lighting and landscaping. Alley improvements and sidewalks,

curbs and gutters are either missing or in need of repair in the residential areas. Finally, soundwalls are needed along the railroad crossings in the residential neighborhoods as a means to remove ambient noise.

Economic Development Programs

The Agency intends to encourage new commercial and industrial development in the proposed Project Area through this program. Under this program, the Agency can enter into public private partnerships by assisting with land assembly, site preparation, offsite improvements, disposition of property, hazardous waste remediation and relocation assistance to existing property owners and tenants. The Agency may also acquire property (without the use of eminent domain) and resell it to developers at the reuse value of the property. Another component of this program will include assistance to existing businesses as a means to retain them in the proposed Project Area.

The program will most likely be focused on those areas where significant deterioration and dilapidation exist. This includes the major commercial corridors of the City that were described under the Commercial Corridor Improvement Program

The Economic Development Program will assist in the elimination of blight in a number of areas, including removal or rehabilitation of the most obsolete structures in the proposed Project Area. This program would address a variety of physical blighting conditions, including deterioration, dilapidation, and obsolescence. The problem of incompatible land uses and parcels of inadequate size can also be addressed through this Program. The Program will also assist in the alleviation of economic blight by reversing conditions of impaired investment, stagnant property values, vacant sites and low lease rates.

Community Facilities and Improvement Programs

One of the major physical blighting conditions is the existence of contaminated groundwater plumes, as discussed in Part 7 of this Report. Through this program, the Agency intends to assist in the remediation of these toxic sites.

The following types of community facilities are also proposed to be constructed in the proposed Project Area:

- Parks and recreation
- Library
- Public safety facilities
- Animal shelter
- Other facilities as needed

A key factor of any successful community is the services and facilities it provides. The City of Lodi is in need of many of the types of facilities described above. Improvements of these types can provide a higher quality of life for residents and also tend to attract more investment into the proposed Project Area.

Housing Programs

The Housing Program will implement one of the major goals of the CRL, which is to increase, improve, and preserve low- and moderate-income housing. 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

In attaining this goal, the Agency will also alleviate certain blighting conditions in the proposed Project Area, such as unsafe or unhealthy buildings, vacancies, deterioration, and impaired investments. Development of new and the rehabilitation of existing housing will also enhance the economic vitality of the proposed Project Area and the entire City.

12.2 OTHER REDEVELOPMENT ACTIVITIES

Additional redevelopment activities may be necessary to alleviate blighting conditions, facilitate development or otherwise carry out the Agency's purposes in the Project Area. Also, the Agency will incur various administrative costs associated with implementing the Project Area. These will include staff time, special legal and technical assistance, and preparing planning and other studies.

12.3 NEED FOR REDEVELOPMENT AND TAX INCREMENT

Generally, the Agency's Redevelopment Program is designed to alleviate blight in the Project Area. The Agency cannot address all conditions of blight, but intends to act as a catalyst to spur the private sector and area residents and businesses to further assist in the revitalization of the Project Area.

The Commercial Corridor Improvement Program and the Neighborhood Improvement will fund improvements designed to strengthen the entire Project Area. Many of these improvements will focus on the most immediate needs, such as water, sewer and drainage improvements and road reconstruction.

A lack of adequate public improvements is a significant factor in causing both economic and physical blight, because this lack reduces the usability of the land and its structures for the purposes for which they are intended. Furthermore, the lack of adequate infrastructure adds significantly to improvement costs. These additional costs could ultimately make the land uneconomic to develop without direct or indirect assistance from the Agency through, among other things, the provision of public improvements.

In other words, land without adequate services may be rendered economically infeasible to upgrade due to the high cost of infrastructure. The Agency could help make the land much more attractive to private investment by financing the construction of public improvements serving the proposed Project Area. This would, in turn, make the land much more attractive to private investment. The new private investment would then generate additional property tax revenues, which ultimately would be recycled into further Agency investment in the proposed Project Area.

The extraordinary combined cost of the various needed infrastructure puts them beyond the financial means of the City, private developers, and individual property owners. As discussed earlier, officials estimate that known public facility needs in the proposed Project Area amount to about \$148,000,000 and this does not include the cost for other revitalization activities or housing programs. This amount cannot be expected to be funded by the City acting alone given the financial situation of the General Fund (see Part 10 for a more complete discussion).

The City could not pay for public improvements in the proposed Project Area without denying services and facilities to other portions of the City for a lengthy period of time. Devoting more of the City's annual budget to activities in the proposed Project Area would severely impact on-going services in the proposed Project Area and elsewhere, including public safety, recreation, facilities maintenance, and services such as water and sewer.

This demonstrates that facilities costs are so high that they would constitute an undue burden on the private sector and the public sector. The lack of adequate public improvements thus generates a substantial burden on the community, which cannot be remedied by private enterprise or by the City alone without redevelopment.

The Housing Program will implement one of the major goals of the CRL, which is to increase, improve, and preserve low- and moderate-income housing. In attaining this goal, the Agency will also alleviate certain blighting conditions in the Project Area. Development of new and the rehabilitation of existing housing will enhance the economic vitality of the region and the Project Area.

As mentioned earlier, the CRL requires that the Agency set aside 20% of the tax increment revenues it receives for the purpose of increasing, preserving, or improving low- and moderate-income housing. Additionally, the CRL requires the Agency to provide replacement housing on a unit for unit basis if any low- or moderate-income housing units are removed from the housing market as a result of the redevelopment program. It is unreasonable to expect the private sector alone could provide such improvements given the socio-economic profile outlined in Chapter 7.0.

In order to ensure the financial feasibility of development and rehabilitation projects in the proposed Project Area, the Agency may find it necessary to directly reduce the cost of development or rehabilitation activities. One technique commonly used by redevelopment agencies is the provision of tax exempt financing, which serves to reduce the financing cost of a project. Such incentives may take the form of certificates of participation, lease revenue bonds, industrial development bonds and various forms of tax exempt notes at various terms.

Another technique available to the Agency is to acquire property in the proposed Project Area and to "write down" the cost of the land when it is sold to a developer or owner

participant. Such land write-downs would only occur in accordance with an executed development agreement, which would provide appropriate assurances that the developer or owner-participant would complete the project. In addition, any Agency commitment to reduce the cost of land it has purchased would be based on a detailed analysis of the developer's cost and revenue pro forma for the proposed project. The sales price may be no less than the "reuse" value of the land. The purpose of such analysis would be to show that the contribution of tax increment funds to the Project through the land write-down process does not simply result in extra profit for the owner participant or project developer. Where a contribution of tax increment funds to a specific development project is determined to be necessary, the Agency may take an equity or income position in the project in order to recoup all or a portion of those tax increment funds to support other Agency activities.

In assisting with rehabilitation activities, the Agency may establish rehabilitation loan programs, which provide financial assistance at favorable interest rates or with other favorable terms. In some instances, Agency grants may be used to induce rehabilitation activities. Agency loans or grants may also be used to assist with the clean-up of hazardous materials.

As with land price inducements, Agency rehabilitation assistance would be provided only to the extent needed, and then only pursuant to an agreement with the property owner or developer to ensure that the rehabilitation work would be completed in accordance with Agency standards.

The types of Agency assistance described above would be the primary tools used to carry out generalized redevelopment activities, such as commercial expansion, neighborhood improvement, and various types of rehabilitation activities. These activities are needed throughout the proposed Project Area and would be used as necessary in conjunction with owner participation and developer agreements.

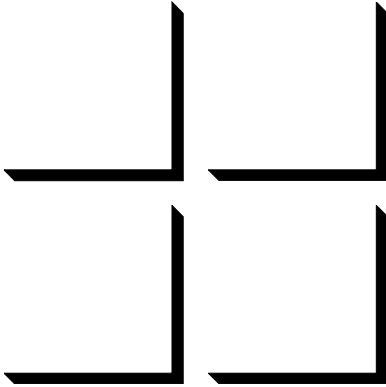
The Agency intends to implement a pro-active program of redevelopment in order to alleviate blight, upgrade infrastructure, create and improve affordable housing, and create an environment for private sector investment in the proposed Project Area. The cost of that program, as described in Part 10 of the Report, will exceed \$187 million, as shown on Table 16. Given the needs of the proposed

Project Area, and the lack of other ongoing funding sources, the Agency will need to look to tax increment financing as a major source of funding. Neither the City nor the private sector has historically been able to finance a redevelopment effort of this type. As previously discussed, the City's general fund is not in a position to fund such an extensive revitalization effort.

As required by the CRL, the Agency will continue to look to other funding sources to assist in the redevelopment effort. However, tax increment is needed to fill funding gaps between the costs identified and these other funding sources. In addition, many of the elements of the program of redevelopment have little or no alternative funding sources.

Other funding sources also have serious limitations. Grants from other levels of government are sporadic and difficult to obtain. Assessment districts can increase the costs for private development and further discourage blight remediation. Development impact fees can only be set at a level to cover the impacts that are created by the development and cannot be used to raise additional funds to remove existing deficiencies in the proposed Project Area.

Tax increment revenues will also be generated by the activities proposed by the Agency. Tax increment provides a stable source of revenue that will grow as the Agency's redevelopment efforts begin to have an impact. In addition, such revenues can be leveraged in the form of tax allocation bonds and provide a large source of capital financing. For each of these reasons, tax increment financing is included in the Redevelopment Plan.



13.0 PROPOSED METHOD OF FINANCING AND FEASIBILITY OF THE PROJECT

Section 33352 (e) of the CRL requires that a Report to City Council include information on the proposed method of financing the redevelopment plan, including information on the economic feasibility of the proposed Project Area. Part 10 includes information on the estimated costs of the program of redevelopment; describes the various financing sources that may be used; and demonstrates the economic feasibility of the proposed Project Area.

13.1 REDEVELOPMENT PROGRAM COSTS

The costs to implement the redevelopment program are summarized on Table 12. The costs on Table 12 are shown in current (2008) dollars and, as such, do not reflect inflation or interest costs. In addition to the program costs shown on Table 12, the Agency will need to incur expenses for administration of the proposed Project Area. Such costs will include staff time, legal and technical assistance, and the preparation of planning studies and reports.

The total costs for the Agency's revitalization effort is estimated at \$266 million in 2008 dollars. A portion of these costs are assumed to be covered from sources other than tax increment, leaving net project costs of \$187.3 million in 2008 dollars.

13.2 FINANCING METHODS AND ALTERNATIVES AVAILABLE TO FUND REDEVELOPMENT

The proposed Redevelopment Plan authorizes the Agency to fund activities from a variety of sources, including: financial assistance from the City, the State and the federal government; tax

increment funds; Agency bonds; donations if offered; special assessment districts; interest income; loans from private financial institutions; the lease or sale of Agency owned property; and any other legally available public or private sources of funding.

The Agency is also authorized to obtain advances, borrow funds and create indebtedness in various forms. This includes the issuance of bonds. The indebtedness and bonds can be repaid from tax increment revenues or other funds available to the Agency. The City may also from time to time provide assistance to the Agency to fund the proposed Project Area, as it is able to.

Sources other than Tax Increment

Financial assistance from the City, state and federal government may be used by the Agency to fund redevelopment program expenses. However, the City's general fund is not in a position to provide the funding needed for a revitalization effort. The following information has been taken from the City's 2007-08 budget, see Appendix B. Over 50 percent of the City's budget is dedicated to public safety services, with the rest dedicated to other traditional municipal services, including public works and recreation. Over the past several fiscal years, the City has had to restrain spending in order balance its budget and restore financial stability to the general fund. The City has set as a goal a minimum reserve policy of 15 percent of expenditures. This would translate into a target reserve fund level of approximately \$6.7 million for 2007-08. The projected reserve level for 2007-08 is \$3.5 million, which is a significant improvement over the level in 2003-04, when reserves equaled only \$200,000. Given slowing revenue growth in the City for the next few years (sales tax is projected to actually decline in 2007-08), it is not likely that the City will be in position to contribute any general funds to a redevelopment effort.

The Agency will also actively solicit financial assistance in the form of grants and loans from the State and federal government. This form of funding may provide a part of the funding that cannot be provided through tax increment financing.

As part of the implementation of redevelopment, the Agency may acquire property. The sale of such property will create a resource that can be used to fund redevelopment activities. In most instances, land sale proceeds only offset a portion of the costs for a specific development project, and do not create a resource that is available for a general revitalization effort. Specific information on land acquisition or sale proceeds are not specifically known at this time, but are assumed to provide a part of the funding for the Economic Development Program.

The Agency also intends to implement a façade improvement program as part of its Economic Development Program. Some portion of the funds used for rehabilitation will likely be in the form of loans, which will be repaid over time and provide part of the funds for the Economic Development Program.

The Agency may also consider the creation of assessment and community facilities districts to fund redevelopment activities. Such districts will require voter approval from those that live within the boundary of such district.

The City also receives a portion of State gas tax funds. These funds are currently used to fund the Public Works departments ongoing street maintenance program. Gas tax funds may become available at some point in the future to do some of the major infrastructure work needed in the proposed Project Area. Measure K funds (the additional ½ cent sales tax) are currently committed to a number of other projects, but could become available to assist with some of the infrastructure needed in the proposed Project Area in the future.

Tax Increment Revenues, Bonds and Limitations

Table 13 provides an estimate of the tax increment revenues that could be generated over the 45 year period when the Agency can receive tax increment. The tax increment revenue projection is based on the following assumptions:

- The Proposition 13 allowable inflationary adjustment of up to 2 percent annually.
- An additional 2 percent adjustment to taxable values to reflect changes of ownership and other new development activity not identified in the table below.
- New development activity that is assumed to occur based on Agency activities. New development is based on the following:

NEW DEVELOPMENT POTENTIAL		
	Square Footage	Estimated Value
Commercial	666,000	\$105,693,598
Industrial	924,800	\$143,144,028
Total	1,590,800	\$248,837,626

Total gross tax increment shown on Table 13 is estimated at \$1.2 billion in future dollars and \$260.9 million in current (2008)

dollars, assuming a 5.5 percent discount rate. This amount has been reduced for property tax administrative fees that will be collected by the County. Mandatory tax sharing payments to the taxing entities per the provisions of the CRL have also been deducted. The tax sharing payments are based on a three tier formula. All payments are made after the Agency’s deposit to its housing set-aside.

TABLE 11
TAX SHARING PAYMENTS

TIER	PAYMENT REQUIRED
Tier 1	25% of total tax increment during the entire term the Agency receives tax increment.
Tier 2	Beginning in the 11th year that the Agency receives tax increment, an additional payment equal to 21% of the tax increment attributable to growth above year 10 levels.
Tier 3	Beginning in the 31st year that the Agency receives tax increment, an additional payment equal to 14% of the tax increment attributable to growth above year 30 levels.

The Agency will also be required to deposit 20 percent of tax increment into a Low and Moderate Income Housing Fund. The deposit to the Housing Fund is estimated at \$242.1 million (\$52.2 million in current dollars).

After reductions for the above items, discretionary tax increment is estimated at \$566 million. In current dollars, discretionary tax increment is estimated at \$136.2 million.

The Agency will also be authorized to issue tax allocation bonds under the Redevelopment Plan. Provisions of the CRL require that the Agency establish a limitation on the principal amount of bonds that can be outstanding at one time. That limit has been calculated on Table 14. The limitation is based on the total program costs shown on Table 12. In addition, the school districts are estimated to receive approximately \$14 million from Tax Sharing Payments that can be used for facilities. The districts may wish to have the Agency issue bonds with these funds, so they have been included in the bond limit. Because the costs on Table 12 do not include any provisions for contingencies, a 30 percent factor has been applied to program costs. Inflationary impacts must also be considered, and so a factor of 30 percent has been added for this. The Agency will incur various costs when issuing bonds. Therefore, a 15 percent factor has been applied for finance costs. Based on these factors, the total bonded indebtedness limit for the proposed Project Area has been calculated at \$400 million.

13.3 PROPOSED FINANCING METHOD AND ECONOMIC FEASIBILITY

The proposed method of financing redevelopment and the economic feasibility of the proposed Project Area have been demonstrated under two different approaches. First, a cash flow analysis was prepared for the first ten years of Project implementation, as shown on Table 15. Second, aggregate costs were compared to aggregate revenues on a net present value basis to determine the overall feasibility of the proposed Project Area. This is shown on Table 16.

It should be noted that the analysis shown on Tables 15 and 16 are based on one set of assumptions for implementation of redevelopment. It should not be considered the only possible scenario for the financing of finance redevelopment of the proposed Project Area. The analysis does indicate that the proposed Project Area is financially feasible given the set of assumptions that underlie the projections. The primary assumptions in this regard are that the costs for redevelopment activities are as projected and that new development activity will occur in the proposed Project Area as the Agency begins to remove impediments to development. In addition, there are segments of Agency acting that may be undertaken even if less than all redevelopment actives are undertaken.

The cash flow analysis (Table 15) shows a projection for the first ten years of Project implementation. The cash flow reflects the following assumptions:

- During the initial five years of implementation the Agency pays for its redevelopment programs on a pay-as-you-go basis and begins to implement each of it programs;
- The Agency issues bonds in 2013-14 and uses the proceeds to invest in major infrastructure improvements as part of the Commercial Corridor and Neighborhood Improvement Program.
- The Agency implements its Economic Development Program out of current tax increment on a pay as you go basis.
- Additional bonds are issued toward the end of the ten year period, with the proceeds used to fund additional public improvements as part of the Commercial Corridor and Neighborhood Improvement Program.

The cash flow for the first ten years also indicates that achieving each of the above activities will largely take all of the available resources of the Agency. At the end of the tenth year, all but \$168,000 in resources will have been used.

The overall picture for Project implementation is shown on Table 16. The analysis indicates that the Agency can meet the costs for all of the programs outlined in this section. Thus, the proposed Project Area would be financially feasible. At the end of the proposed Project Area all but \$1.2 million of the resources generated by the proposed Project Area would be used. The funding amount represents a hedge against future uncertainties.

Table 12
PROJECTS AND PROGRAMS (000'S Omitted)

	Total Cost	(1) Non Tax Increment Funds	Net Project Costs
Commercial Corridor Improvement Program			
Water, Sewer and Storm Drains			
Underground Utilities			
Pedestrian Improvements			
Streetscapes			
Street Reconstruction			
Billboard Removal			
Signage			
Commercial Rehabilitation			
Total	70,675	24,736	45,939
Neighborhood Improvement Program			
Water, Sewer and Storm Drains			
Underground Utilities			
Pedestrian Improvements			
Soundwalls			
Alley Improvements			
Water meters			
Sidewalk, Curb and Gutter			
Total	57,398	20,089	37,309
Economic Development Program			
Redevelopment & Design Assistance			
Site Assembly			
Façade Improvements			
In lieu assistance			
Signage			
Parking			
Total	42,573	10,643	31,930
Community Facilities and Improvement Program			
Toxic Remediation			
Parks and Recreation			
Library			
Public Safety Facilities			
Animal Shelter			
Grape Bowl			
Total	25,544	8,940	16,603
Housing Program			
First Time Homebuyers / Downpayment Asst.			
Senior Housing			
Rehab. Loans and Grants			
Workforce Housing			
Total	55,246	0	55,246
Administrative Costs (2)	37,405		37,405
TOTAL - PROGRAM COSTS	288,840		224,431

(1) Reflects sources other than tax increment. Estimated at 45 percent of project costs for infrastructure improvements and other facilities and 35 percent for Economic Development.

(2) Represents 20 percent of program costs.

Table 13
Lodi Redevelopment Agency
Lodi Community Improvement Project

TAX INCREMENT PROJECTION
(000's Omitted)

Fiscal Year	Escalated (1) Prior Year Value	New (2) Value of Development	Total Value	Value Over Base Of 1,340,914	(3) Tax Increment	(4) Property Tax Fees	(5) Statutory Payments	Housing Set-Aside	Discretionary Tax Increment Revenue
2007 - 2008			N/A	N/A	N/A	N/A	N/A	N/A	N/A
2008 - 2009	1,364,735	0	1,364,735	23,821	N/A	N/A	N/A	N/A	N/A
2009 - 2010	1,389,033	0	1,389,033	48,119	481	10	76	96	299
2010 - 2011	1,444,594	8,391	1,452,985	112,071	1,121	22	177	224	697
2011 - 2012	1,511,104	24,760	1,535,864	194,950	1,950	39	308	390	1,213
2012 - 2013	1,597,299	32,149	1,629,448	288,534	2,885	58	456	577	1,795
2013 - 2014	1,694,626	19,060	1,713,685	372,771	3,728	75	589	746	2,319
2014 - 2015	1,782,233	19,511	1,801,744	460,830	4,608	92	728	922	2,866
2015 - 2016	1,873,813	18,279	1,892,092	551,178	5,512	110	871	1,102	3,428
2016 - 2017	1,967,776	76,786	2,044,562	703,648	7,036	141	1,112	1,407	4,377
2017 - 2018	2,126,345	76,546	2,202,890	861,976	8,620	172	1,362	1,724	5,361
2018 - 2019	2,291,006	27,080	2,318,086	977,172	9,772	195	1,544	1,954	6,078
2019 - 2020	2,410,809	12,589	2,423,398	1,082,484	10,825	216	1,850	2,165	6,593
2020 - 2021	2,520,334	1,427	2,521,761	1,180,847	11,808	236	2,136	2,362	7,075
2021 - 2022	2,622,632	0	2,622,632	1,281,718	12,817	256	2,429	2,563	7,568
2022 - 2023	2,727,537	0	2,727,537	1,386,623	13,866	277	2,734	2,773	8,081
2023 - 2024	2,836,639	0	2,836,639	1,495,725	14,957	299	3,051	2,991	8,615
2024 - 2025	2,950,104	0	2,950,104	1,609,190	16,092	322	3,381	3,218	9,170
2025 - 2026	3,068,108	0	3,068,108	1,727,194	17,272	345	3,724	3,454	9,748
2026 - 2027	3,190,833	0	3,190,833	1,849,919	18,499	370	4,081	3,700	10,348
2027 - 2028	3,318,466	0	3,318,466	1,977,552	19,776	396	4,452	3,955	10,973
2028 - 2029	3,451,205	0	3,451,205	2,110,291	21,103	422	4,838	4,221	11,622
2029 - 2030	3,589,253	0	3,589,253	2,248,339	22,483	450	5,239	4,497	12,298
2030 - 2031	3,732,823	0	3,732,823	2,391,909	23,919	478	5,657	4,784	13,000
2031 - 2032	3,882,136	0	3,882,136	2,541,222	25,412	508	6,091	5,082	13,731
2032 - 2033	4,037,421	0	4,037,421	2,696,507	26,965	539	6,542	5,393	14,490
2033 - 2034	4,198,918	0	4,198,918	2,858,004	28,580	572	7,012	5,716	15,281
2034 - 2035	4,366,875	0	4,366,875	3,025,961	30,260	605	7,500	6,052	16,102
2035 - 2036	4,541,550	0	4,541,550	3,200,636	32,006	640	8,008	6,401	16,957
2036 - 2037	4,723,212	0	4,723,212	3,382,298	33,823	676	8,536	6,765	17,846
2037 - 2038	4,912,140	0	4,912,140	3,571,226	35,712	714	9,085	7,142	18,770
2038 - 2039	5,108,626	0	5,108,626	3,767,712	37,677	754	9,657	7,535	19,726
2039 - 2040	5,312,971	0	5,312,971	3,972,057	39,721	794	10,431	7,944	20,795
2040 - 2041	5,525,490	0	5,525,490	4,184,576	41,846	837	11,237	8,369	21,972
2041 - 2042	5,746,509	0	5,746,509	4,405,595	44,056	881	12,075	8,811	23,267
2042 - 2043	5,976,370	0	5,976,370	4,635,456	46,355	927	12,947	9,271	24,680
2043 - 2044	6,215,424	0	6,215,424	4,874,510	48,745	975	13,854	9,749	26,197
2044 - 2045	6,464,041	0	6,464,041	5,123,127	51,231	1,025	14,796	10,246	27,861
2045 - 2046	6,722,603	0	6,722,603	5,381,689	53,817	1,076	15,777	10,763	29,644
2046 - 2047	6,991,507	0	6,991,507	5,650,593	56,506	1,130	16,796	11,301	31,579
2047 - 2048	7,271,167	0	7,271,167	5,930,253	59,303	1,186	17,857	11,861	33,620
2048 - 2049	7,562,014	0	7,562,014	6,221,100	62,211	1,244	18,960	12,442	35,767
2049 - 2050	7,864,495	0	7,864,495	6,523,581	65,236	1,305	20,107	13,047	38,014
2050 - 2051	8,179,074	0	8,179,074	6,838,160	68,382	1,368	21,300	13,676	40,374
2051 - 2052	8,506,237	0	8,506,237	7,165,323	71,653	1,433	22,540	14,331	42,844
2052 - 2053	8,846,487	0	8,846,487	7,505,573	75,056	1,501	23,831	15,011	45,474
Cumulative Totals					1,283,682	25,674	345,738	256,736	819,893
Net Present Value (6)					276,228	5,525	67,339	55,246	170,291

(1) Future year property values increased at 2 percent per year for 2008-09 and 2009-10 and 4% thereafter.
 (2) See Report for new development assumptions.
 (3) Based on the application of the 1 percent tax rate to incremental value.
 (4) Estimated based on 2 percent of tax increment.
 (5) Payments per the provisions of AB 1290. Amount shown is net of the City share.
 (6) Net present value calculated at 5.5 percent discount rate.

Table 14
 Lodi Redevelopment Agency
 Lodi Community Improvement Project

ESTIMATED BONDED INDEBTEDNESS LIMIT

(000's Omitted)

Program Costs	\$187,197
Plus: School District Facilities (1)	13,894
Plus: Contingencies @ 30%	60,327
	\$261,419
Plus: Escalation of Costs (2)	78,426
Plus: Finance Costs (3)	50,977
Bonded Indebtedness Limit (Rounded)	<u>\$400,000</u>

- (1) Reflects the estimated amount of Tax Sharing Payments that could be available to schools.
 It has been included in the bond limit in case the schools decide to have the Agency leverage such amounts in future Agency bond issues.
- (2) Escalation of costs in order to take into account inflation impacts on Project costs.
 Amount shown has been calculated at 30 percent of costs.
- (3) Financing costs are the costs of issuance included as 15% of Project Costs (with escalation),
 assuming deposits to reserve fund, underwriters discount and miscellaneous costs associated with the issuance of bonds.

Table 15

Lodi Redevelopment Agency
Lodi Community Improvement Project

CASH FLOW ANALYSIS

(000's Omitted)

	1	2	3	4	5	6	7	8	9	10
	2008-	2009-	2010-	2011-	2012-	2013-	2014-	2015-	2016-	2017-
	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
<u>Resources</u>										
Beginning Balance	\$0	\$0	\$118	\$574	\$227	\$110	\$11,094	\$7,560	\$4,405	\$3,189
Total Tax Increment Revenues	0	443	1,043	1,830	2,722	3,520	4,353	5,208	6,682	8,212
Bond Proceeds	0	0	0	0	0	9,650	0	0	0	0
Investment Earnings	0	0	2	9	3	2	187	134	87	68
Total Resources	\$0	\$443	\$1,162	\$2,413	\$2,953	\$13,282	\$15,635	\$12,902	\$11,173	\$11,470
<u>Expenditures</u>										
Property Tax Admin Fees	0	9	21	37	54	70	87	104	134	164
AB 1290 Pass Through	0	74	174	306	455	589	728	871	1,118	1,374
Debt Service - Bonds	0	0	0	0	0	0	688	688	688	688
Commercial Corridor Improvements	0	0	0	468	487	0	2,632	1,095	1,708	2,812
Neighborhood Improvements	0	0	0	351	365	380	1,316	2,737	1,139	1,480
Economic Development	0	54	84	117	182	190	263	411	569	740
Community Facilities and Improvements	0	0	0	234	365	0	395	411	285	888
Housing Programs	0	89	209	366	544	704	871	1,042	1,336	1,642
Administrative Expenses	0	100	100	307	389	255	1,095	1,139	1,007	1,513
Total Expenditures	\$0	\$326	\$588	\$2,186	\$2,842	\$2,187	\$8,075	\$8,497	\$7,984	\$11,302
Ending Discretionary Balance	\$0	\$118	\$574	\$227	\$110	\$11,094	\$7,560	\$4,405	\$3,189	\$168

Table 16
 Lodi Redevelopment Agency
 Lodi Community Improvement Project

ECONOMIC FEASIBILITY ANALYSIS - NPV (1)

(000's Omitted)

Resources

Discretionary Tax Increment	170,291
Housing Set-aside	55,246
Total Resources	225,537

Program Costs

Commercial Corridor Improvements	45,939
Neighborhood Improvements	37,309
Economic Development	31,930
Community Facilities and Improvements	16,603
Affordable Housing Program	55,246
Administrative Costs	37,405
Total Costs	224,431

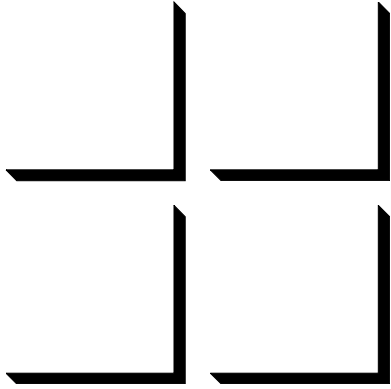
Ending Balance **1,105**

(1) Net present value calculated at 5.5 percent discount rate.

GRC GRC GRC

This page intentionally left blank

GRC GRC GRC



14.0 IMPLEMENTATION PLAN

This Implementation Plan is prepared in compliance with Section 33490 et seq. of the CRL, which requires the adoption of an implementation plan every five years for each redevelopment Project Area. This Implementation Plan for fiscal years 2008/09 – 2013/14 is the first Five-Year Implementation Plan for the proposed Project Area. As such, it is part of this Report to City Council. In accordance with the CRL, the Five-Year Implementation Plan will be updated within the five-year term, not earlier than year two and not later than year three of the Implementation Plan.

It is important to remember that the Redevelopment Plan for the Project Area does not dictate on a parcel-by-parcel basis future redevelopment or revitalization activities. Rather, it authorizes a variety of tools that the Agency may employ to revitalize the Project Area following the generalized blueprint for area land uses set out by the Lodi General Plan. Additionally, actual redevelopment activities and the timing therefore often hinge on the plans and resources of the many tenants, property owners, or business owners in the Project Area, because Redevelopment Law affords these individuals certain rights and opportunities for participation.

Within the goals and activities authorized by the Redevelopment Plan, the Agency may undertake a wide variety of activities aimed at stemming blight and economic decline. Such activities include, but are not limited to:

1. Entering into contractual agreements with existing owners or tenants where the Agency provides financial or other assistance for building repairs or replacement on privately-owned land
2. Developing comprehensive strategies or preparing studies to assist private developers to respond to local economic

opportunities that result in local investment and job creation

3. Financing and constructing needed public facilities and improvements.

In accordance with Redevelopment Law, the Agency is also vested with the responsibility for increasing, preserving, or improving the number of housing units for very-low, low- and moderate-income individuals and families. The Agency is required to set aside a portion of its tax increment revenues for this purpose.

This Implementation Plan addresses implementation activities in the Project Area and identifies Agency-related programs and potential projects scheduled for the next five years in the Project Area.

14.1 GOALS AND OBJECTIVES

The Project Area includes a number of conditions that are specified in the CRL as characteristic of blight. Due to the range of these detrimental physical and economic conditions, the Agency must undertake a comprehensive program of activities, including providing needed public improvements, direct financial assistance to stimulate quality development, financial assistance to promote rehabilitation of existing improvements and structures, and various other activities that would serve existing residents and businesses, and would induce new private investment.

In addition to providing needed public improvements and other assistance, the Agency may assist owner participants or prospective developers by providing redevelopment financing to reduce project development costs, and by assisting with site acquisition and assembly. In doing such, the Agency intends to mitigate the effects of blight in the Project Area.

The following are the major goals and actions of the Agency:

Urban Environment

Overriding Goal: Enhance existing business and residential neighborhoods, and encourage new in-fill development as appropriate.

- Encourage development according to the City's General Plan, as it currently exists or may be amended in the future.
- Help preserve and enhance existing conforming residential neighborhoods through landscaping, street and other infrastructure improvements.
- Work with business and property owners to upgrade their properties in the Project Area.
- Rehabilitate deteriorated residential and commercial properties to eliminate safety deficiencies to extend the useful lives of these structures.
- Encourage policies that protect historic structures and ensure historic preservation in the Project Area.
- Work with property owners and businesses to clean up properties that are or have been exposed to hazardous materials.
- Work with property owners to eliminate the negative impacts related to non-conforming land uses.
- Provide for an appropriate buffer to residential neighborhoods from noise, odors, and vibrations for non-residential uses.
- Promote and ensure an environment that is friendly and safe for pedestrians.
- Strengthen pedestrian connections between neighborhoods, and from the Project Area to the rest of the City.

Economic Development

Overriding Goal: Create successful commercial and industrial employment areas to serve local residents, businesses, employees and visitors.

- Develop infrastructure improvements that facilitate private investment in the Project Area.

- Assist economically depressed properties to reverse stagnant or declining property investment through infrastructure improvements and programs.
- Expand opportunities for shopping and services by encouraging the development of new commercial uses that fulfill unmet needs in the community and rehabilitation of existing commercial properties.
- Work with property owners to consolidate parcels to induce new or expanded business development.
- Promote the development of new commercial and industrial opportunities that provide for diverse employment opportunities.
- Provide relocation assistance to businesses and residents in accordance with current law.

Housing Affordability and Quality

Overriding Goal: Establish the Project Area as a community with a high-quality housing stock that includes a variety of housing unit types affordable to a wide range of households.

- Improve the appearance and attractiveness of residential neighborhoods through neighborhood improvement programs, code enforcement efforts, and residential rehabilitation programs.
- Protect the health and general welfare of the Project Area's low- and moderate-income residents by utilizing 20% of the property tax increment revenues to improve, increase and preserve the supply of low- and moderate-income housing.
- Provide replacement housing as required by law if any dwelling units affordable to low- or moderate-income persons or families are lost from the housing supply as a result of Agency activities.
- Provide relocation assistance to businesses and households displaced by Agency activities.

- Provide housing rehabilitation programs to upgrade properties to eliminate blight and adverse code conditions.

Public Infrastructure

Overriding Goal: Improve the Project Area’s public infrastructure system to ensure public health, safety and welfare of residents, businesses, and properties

- Provide for improvements to the infrastructure system that cannot be undertaken by a single property owner, but must be improved on an area-wide basis such as drainage improvements, water distribution lines, flood control facilities, and under-grounding of utilities.
- Provide a range of public infrastructure improvements that induce or facilitate private investment such as intersection upgrades, streets, curbs and gutters, sidewalks, street medians, and parking management facilities.
- Work with property owners on the location and timing of improvements to economically assist the repositioning and development of parcels.

Plan Management

Overriding Goal: Ensure that the Lodi Community Improvement Project is managed in the most efficient, effective and economical manner possible.

- Encourage the cooperation and participation of property owners, tenants, residents, public agencies, and community organizations in the elimination of blighting conditions and the promotion of new or improved development in the Project Area.
- Establish programs and activities which assist, complement, and coordinate with public and private development and encourage revitalization and enhancement in the Project Area.
- Oversee the necessary infrastructure improvements in a coordinated and efficient manner.

14.2 REDEVELOPMENT ACTIVITIES

The primary purpose of the Redevelopment Plan is to alleviate conditions of blight in the proposed Project Area. The Agency is planning to, but is not limited to, accomplish this task through the implementation of the following programs:

Public Improvements

A lack of adequate public improvements is a significant factor in causing both economic and physical blight in the proposed Project Area. Furthermore, the lack of adequate infrastructure adds significantly to improvement costs. These additional costs could ultimately make the land economically infeasible to develop or improve without direct or indirect assistance from the Agency through, amongst other things, the provision of public facilities and infrastructure.

In other words, land without adequate services may be rendered economically infeasible due to the high cost of providing new or upgraded infrastructure. The Agency could help make investments more attractive to property owners by financing the construction of public facilities serving the proposed Project Area. The new private investment would then generate additional property tax revenues, which ultimately would be recycled into further Agency investment in the proposed Project Area.

The Agency may, with the consent and cooperation of the City Council and adoption of certain findings specified in CRL Section 33445 (and 33679 as necessary), pay all or part of the value of the land for, and the cost of the installation and construction of, any buildings, facilities, structures or other improvements which are publicly owned, including school facilities, either outside or inside the Project Area.

Without limiting its general authority, the Agency is specifically authorized to provide or participate in providing the improvements described in Redevelopment Plan, as well as the public improvements or facilities listed below:

Commercial Corridor Improvement Program

The Agency intends to fund improvements designed to strengthen the major commercial corridors in the Project

Area. Improvements will focus on the following major commercial corridors:

- Lodi Avenue
- Cherokee Lane
- Kettleman Lane
- Lockeford Street
- Pine Street
- Victor Road
- Central Avenue
- Main Street

Improvements that are needed along these major commercial corridors include:

- Water, sewer and storm drains
- Undergrounding of utilities
- Pedestrian improvements
- Streetscape improvements
- The reconstruction of streets
- Billboard removal
- Improved signage
- Graffiti abatement programs/funding
- Capital facilities that help reduce crime
- Streetscape improvements along the major corridors of the Project Area, including the installation of street trees, landscaped medians, entry way signs, new signage and the removal of billboards.

Also as a part of the Commercial Corridor Improvement Program, the Agency intends to implement a commercial rehabilitation program. This program would focus on providing loans and grants for the rehabilitation of existing commercial and industrial buildings. The Agency also intends to promote and encourage sustainable development and reduce energy consumption in its programs and projects.

Neighborhood Improvement Program

The Agency intends to fund improvements designed to upgrade and strengthen the residential areas of the Project Area. Improvements to include:

- Water, sewer and storm drains
- Installation of water meters
- Undergrounding of utilities
- Pedestrian improvements

- Soundwalls
- Alley improvements
- Sidewalk, curb and gutters
- ADA accessibility improvements
- Promotion and encouragement of sustainable development and reduction of energy consumption

Economic Development Programs

The Agency intends to encourage new commercial and industrial development in the Project Area through this program. Under this program, the Agency can enter into public private partnerships by assisting with land assembly, site preparation, offsite improvements, disposition of property, hazardous waste remediation and relocation assistance to existing property owners and tenants. The Agency may also acquire property (but not through eminent domain) and resell it to developers at the reuse value of the property. Another component of this program will include assistance to existing businesses as a means to retain them in the proposed Project Area.

The Agency may also assist existing and future businesses through the payment of development impact fees, assessments and mitigations to the extent permitted by law.

This program will most likely be focused on those areas where significant deterioration and dilapidation exist. This includes the major commercial corridors of the City that were described under the Commercial Corridor Improvement Program. Priorities may also be established based upon the willingness of private parties to invest private capital.

Community Facilities and Improvement Programs

One of the major physical blighting conditions is the existence of contaminated groundwater plumes. Through this program, the Agency intends to assist in the remediation of these toxic sites.

The following types of community facilities also may be constructed in the Project Area:

- Parks, stadium and other recreation
- Libraries

- Public safety facilities, including police and fire facilities
- Animal shelter
- Green development enhancements at existing and future facilities
- Other facilities as needed

Housing Programs

The Housing Program implements one of the major goals of the CRL, which is to increase, improve, and preserve low- and moderate-income housing. The Agency intends to implement the following types of projects:

- First time homebuyers down payment assistance program
- Housing Rehab Loan Program
- Senior Housing
- Workforce Housing Development

Additional Facilities or Improvements

Changes in circumstances or designs may alter the location of the facilities described above, or may require other related facilities. The financing of such related facilities shall be deemed authorized by the Agency.

The Agency will be authorized to finance the construction of additional improvements in the Project Area based on the requirements of any future project environmental impact report, or any other State, regional or local regulatory program. These items may include, but are not limited to, travel demand management strategies, storm water runoff prevention and best management practices, and Federal Emergency Management Agency regulations.

Development Assistance

In order to ensure the financial feasibility of development and rehabilitation projects in the proposed Project Area, the Agency may find it necessary to directly reduce the cost of development or rehabilitation activities. One tool commonly used by redevelopment agencies is the provision of tax exempt financing, which serves to reduce the

financing cost of a project. Such incentives may take the form of certificates of participation, lease revenue bonds, industrial development bonds, and various forms of tax-exempt notes at various terms.

Another tool available to the Agency is to acquire property (without using eminent domain) in the proposed Project Area and to “write down” the cost of the land when it is sold to a developer or owner participant. Such land write-downs would only occur in accordance with an executed development agreement, which would provide appropriate assurances that the developer or owner-participant would complete the project. In addition, any Agency commitment to reduce the cost of land it has purchased would be based on a detailed analysis of the developer’s cost and revenue pro forma for the proposed project. The sales price may be no less than the “reuse” value of the land. The purpose of such analysis would be to show that the contribution of tax increment funds to the Project through the land write-down process does not simply result in extra profit for the owner participant or project developer. Where a contribution of tax increment funds to a specific development project is determined to be necessary, the Agency may take an equity or income position in the project in order to recoup all or a portion of those tax increment funds to support other Agency activities.

In assisting with rehabilitation activities, the Agency may establish rehabilitation loan programs, which provide financial assistance at favorable interest rates or with other favorable terms. In some instances, Agency grants may be used to induce rehabilitation activities. Agency loans or grants may also be used to assist with the clean up of hazardous materials.

As with land price inducements, Agency rehabilitation assistance would be provided only to the extent needed, and then only pursuant to an agreement with the property owner or developer to ensure that the rehabilitation work would be completed in accordance with Agency standards.

The types of Agency assistance described above may be the primary tools used to carry out generalized reinvestment activities, such as commercial expansion, industrial renewal, neighborhood improvement, and various types of rehabilitation activities. These activities are needed throughout the proposed Project Area and will be used as necessary in conjunction with owner participation and developer agreements.

Housing Assistance

The CRL requires that the Agency set aside not less than 20% of the tax increment revenues it receives for the purpose of increasing, preserving, or improving low- and moderate-income housing.

Additionally, the CRL requires the Agency to provide replacement housing on a unit-for-unit basis if any low- or moderate-income housing units are removed from the housing market as a result of the reinvestment program. It is difficult to ascertain in detail the income levels of residents within the area. The best available data source for area-specific household income is the U. S. Census, however the boundaries of the Census tracts that include the Project Area are exceedingly large and the number of representative households greater than the number in the Project Area. Therefore the data would not provide any detailed certainty about income levels within the Project Area. Therefore it is difficult to determine how many housing units could be subject to replacement housing as defined. However, the Agency will not have eminent domain authority, so this requirement is relatively moot unless there would only be a voluntary sale of low- or moderate-income residential units for some redevelopment purpose.

The Agency expects the amount of tax increment funds set aside for low- and moderate-income housing will be used for a multitude of housing programs, including housing rehabilitation and new development. In addition, because of the vast needs in the proposed Project Area, the Agency will strive to provide housing projects and programs within the boundaries of the proposed Project Area, although such activity could occur outside of the proposed Project Area.

Relocation Assistance

The CRL and the Relocation Guidelines of the State of California require that relocation assistance be provided to persons, businesses, and other entities displaced as a result of redevelopment activities. Relocation assistance must include relocation advisory assistance, as well as financial assistance to offset moving expenses and to otherwise assist displaced persons or businesses in locating suitable replacement facilities.

Business and industrial relocation expenses are limited to the expenses involved in moving the business to another

location, as well as certain re-establishment costs. These costs may be substantial depending upon the particular circumstance.

Over the life of the Project, relocation expenses may be incurred for residential and commercial uses if dilapidated buildings, nonconforming uses, and other hazards are removed from the proposed Project Area for purposes of redevelopment. In such cases, the Agency will meet its legal obligations to provide relocation assistance and benefits to relocatees.

Property Acquisition and Assemblage

The Agency is including the authority to purchase land through any legal means excluding eminent domain. Land acquired by the Agency may subsequently be assembled and disposed of in any legal means, such as land write-downs or other techniques, to facilitate development in the Project Area in conformance to the General Plan.

Financing

The Agency will begin to receive tax increment for the first time from the Project Area in FY 09/10. It is estimated that gross tax increment in that year will be approximately \$443. Of this amount, County administrative fees and tax sharing payments will total \$83,000, leaving \$272,000 in discretionary tax increment and \$89,000 in housing set-aside funds. Over the five-year term of this Implementation Plan, it is estimated that discretionary tax increment will equal approximately \$3.7 million and the housing set-aside will total \$1.2 million. The revenues will be used to finance one or more of the projects shown above; to pay the administrative costs of the Agency; and to make the statutory payments to the taxing entities.

14.3 FIVE YEAR PHASING PROGRAM AND ESTIMATED EXPENDITURES

CRL Section 33352 requires a program of actions and expenditures, which are proposed within the first five years of the plan. This section contains preliminary project improvement priorities based in part on identified needs and in part on potential tax increment revenues for the Plan's first five years. The following program also sets forth general program goals for the development assistance, housing assistance, relocation assistance, and property

acquisition elements of the Redevelopment Plan. Note that goals for these non-capital programs cannot be quantified, and that the precise extent to which they are used may depend on specific and unforeseeable circumstances beyond the control of the Agency.

As with any redevelopment project, it takes many years to accumulate a tax increment stream sufficient to undertake significant improvement projects. Therefore, the activities earmarked for the first five years for the Project Area are modest.

Based on tax increment projections for the Project Area (see Chapter 12.0), it is anticipated that the Agency will have received roughly \$6 million in tax increment revenues at Year Five. Of this, expenditures for administration fees, housing set-aside, and pass-through payments will total \$1.1 million. The Agency will have approximately \$3.7 million for non housing activities and \$1.2 million for housing activities. Of course, this is based on projections of revenues, and the actual amount that is available could be more or less than this amount. .

Given this, the Agency cannot commit to funding any particular project, or to the level of funding, because the exact amounts of tax increment revenues available to the Agency at this point is not known. It may be possible to increase the above amounts through borrowing against future years' increment. Subsequent to the adoption of the Redevelopment Plan, these funding priorities will be reviewed as a part of the implementation plan update required for the Project Area pursuant to CRL Section 33490, and also as a part of the Agency's budget process.

To the extent feasible, the following specific projects will be undertaken in the initial five year period. Expenditures are estimates only and the actual may vary without the need to amend this Implementation Plan. Actual funding decisions will be made by the Agency Board as part of the annual budget process.

Commercial Corridor Improvements Program

The Agency will focus this program first on upgrades and improvements to Cherokee Lane and Lodi Avenue. Depending on the level of funding that is available, improvements could include:

- Streetscape improvements to certain portions of the two streets
- Pedestrian improvements
- Billboard removal
- Improved signage

It is unlikely that street reconstruction or major improvements to utilities could occur during the first five year period, given funding constraints. The Agency's expenditures for this program could be in the range of \$800,000 to \$1.0 million over the five year period.

Neighborhood Improvement Program

This program will initially assist with the installation of curbs, gutters and sidewalks in various neighborhoods in the Project Area. In addition, the Agency may assist homeowners with the cost to install water meters. The Agency's expenditures for this program could be in the range of \$500,000 to \$700,000 over the five year period.

Economic Development Program

The Agency may provide financial and other assistance as authorized by the CRL and the Redevelopment Plan to individual projects on an as-needed basis, and depending on the availability of Agency funds or other resources. This type of assistance typically would occur by the Agency entering into agreements with property owners to improve or upgrade their properties. The Agency may also assist existing and future businesses through the payment of development impact fees, assessments and mitigations to the extent permitted by law.

The Agency also intends to implement its façade improvement / business loan program during the initial five year period. Under this type of program, the Agency can provide deferred payment and low interest loans to assist property owners with upgrades to the exterior of their buildings and the installation of new equipment.

Estimated Agency expenditures for this program are in the range of \$700,000 to \$1.0 million.

Housing Assistance

During the period of this implementation program, housing assistance funds from the Low- and Moderate-Income Housing Fund may be used to improve, preserve, or increase the supply of low- and moderate-income housing throughout the City as appropriate and consistent with the General Plan. These activities could include assistance in providing moderate or lower income housing in the Project Area, as appropriate. Housing assistance will be provided in accordance with the General Plan housing element.

Given the newness of the Project Area, and the resultant low financial capacity of the low- and moderate-income housing fund, it is expected that the housing program will be very modest during the initial five years. A detailed housing program has not been established at this time, although one may be prepared by the Agency in the future.

The major focus of the Agency's initial housing efforts will be on the creation of senior housing in the community. The Agency will also attempt to assist with rehabilitation of existing housing, which could include programs like paint up / fix up program. Agency expenditures for affordable housing during the five year period of the Plan are estimated to be in the range \$1.0 million to \$1.2 million.

Through year 45, when the Redevelopment Plan's authority to collect tax increment expires, the Agency will receive approximately \$256.7 million in housing funds, \$55 million when inflation is accounted for. At a City average of \$150,000 per unit, the fund could help improve up to 366 units through rehabilitation, first-time homebuyers programs, and other affordability subsidies.

The CRL also requires the Agency to ensure that at least 15% of all new or significantly rehabilitated housing units are reserved for low- or moderate-income households. Based on current General Plan housing development projections for the Project Area of up to 1,800 units, this means that the Agency will need to set aside up to 170 units over the lifetime of the project to meet these inclusionary housing requirements.

From time-to-time, and as conditions warrant, replacement housing for low- and moderate-income households with severe health and safety concerns may be provided through the Low- and Moderate-Income Housing Fund in a manner consistent with the Redevelopment Plan.

Other Implementation Costs

In addition to the program costs discussed above the Agency will need to incur expenses for administration of the proposed Project Area. Such costs will include staff time, legal and technical assistance, and the preparation of planning studies and reports. Such costs are estimated to be in a range of \$500,000 to \$1.0 million over the five year period.

14.4 ALLEVIATION OF BLIGHTING CONDITIONS

As documented in this Report, there are detrimental physical and economic conditions in the Project Area. The Agency proposes to alleviate these conditions by undertaking the comprehensive program of public improvements and development incentives described in this Chapter and in Chapter 11. Together, these programs will stimulate new development and rehabilitation activities in the Project Area, not only in the next five years, but also throughout the lifetime of the Redevelopment Plan.

Successful implementation of the Redevelopment Plan will result in increased economic activity in the Project Area and in the surrounding portions of the community. Such activity will increase the number of local employment and shopping opportunities, and expand the City's tax base for the support of essential services. This, in turn, will spark additional investment in the community.

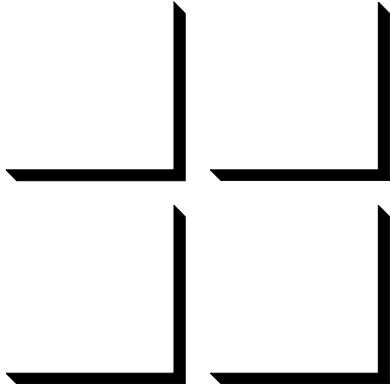
In addition, Project implementation is expected to alleviate detrimental physical conditions through tools such as replacement or rehabilitation of deteriorating land uses, and provisions for needed public improvements. Project implementation is also anticipated to provide for the rehabilitation of dwelling units available to low- and moderate-income residents in those areas with residential deterioration.

Improvement activities listed earlier in this chapter will address blighting conditions in a number of ways:

1. Residential rehabilitation programs will reduce the number of health and safety risks to which Project Area citizens are exposed. Such improvements could take the form of repairing structural damage, flood prevention, abating asbestos-containing materials, or other factors that may be discovered. These activities would result in a cleaner, healthier, and safer quality of life for residents. Property values would also likely increase, which protects homeowners' investments.
2. Various street improvements will enhance circulation through and within the Project Area, thus reducing traffic congestion and easing access to parcels. Improvements to circulation will help attract customers to the Project Area, while also helping to attract new businesses. Roadway improvements also help attract new investment by signaling to the financial and commercial communities that the City of Lodi and the Agency are willing to provide the services necessary to help ensure the success of investments. Improvements to drainage, as well as the sewer and water systems would provide similar results. Improvements to circulation, including street reconstruction and sidewalk reconstruction or construction will help attract new investment.
3. Streetscapes and other aesthetic enhancements improve the visual quality of various residential and commercial neighborhoods. This, in turn, has the effect of helping to induce new investment or reinvestment. An improved visual image often attracts more customers to local stores, which increases local sales. These improved sales increase the value of previously impaired investments, and help make more capital available for reinvestment in local businesses. Additional sales volume improves sales tax receipts to the City, which in turn may be used for increased local public facilities and economic development programs. Improved neighborhood image also has the effect of increasing local pride. Increased local pride often induces improved maintenance and enhances the willingness of residents and businesses to be more protective of their surroundings. This often results in a patrol effect that helps to reduce local crime, especially crimes against property.
4. Community facility improvements listed in this chapter will help reduce blight by improving the image of the Project Area, attracting visitors, and improving the living environment for existing and future residents.

Various new community attractions serving the Project Area will help economically strapped businesses by bringing in new customers. This will increase sales, which then will result in improved investments, and ultimately more capital available for reinvestment in the local community. At the same time, improved community facilities will enhance the living environment for local residents. This improved quality of the environment will result in improved property values and greater neighborhood pride. This will result in significantly increased reinvestment in the Project Area's residential neighborhoods.

5. Economic development programs are intended to reduce blight by helping existing businesses to market themselves, to expand, and to improve their competitiveness by attracting new customers into the Project Area. Business improvement and expansion also creates new jobs, which will help improve local employment opportunities. This will have the result of improving disposable incomes and local sales.
6. Economic development programs are also intended to help reduce blight by attracting new businesses to the Project Area on currently vacant or underutilized parcels through recruitment programs, site acquisition assistance and/or site development aid. These new investments will help existing businesses, while improving overall property values and sales tax receipts. New and expanded investments will also create new jobs, which will help improve local employment opportunities, as well as improve disposable incomes and local sales.



15.0 ANALYSIS OF THE PRELIMINARY PLAN

The purpose of the Preliminary Plan is to describe the boundaries of the Project Area, make a general statement of the purpose of the Project, and to describe land uses, layout of principal streets, building intensities and standards proposed as the basis for redevelopment of the Project Area. The Preliminary Plan also shows how the purposes of the CRL would be attained through the redevelopment of the area, how the proposed redevelopment would conform to the General Plan, and describes generally the impact of the Redevelopment Plan upon residents thereof and upon surrounding neighborhoods.

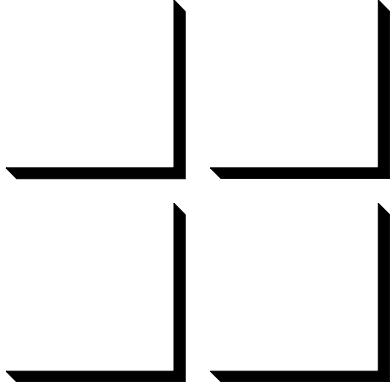
On November 14, 2007, the Planning Commission adopted a resolution selecting the boundaries of the Project Area and formulating and approving a Preliminary Plan for the redevelopment of the selected area. A copy of the Preliminary Plan, the adopted resolution, and the minutes of the Planning Commission meeting are available at the offices of the Agency.

The boundaries that were selected in the Preliminary Plan provided a basis for notifying property owners, tenants, and affected taxing agencies of the Agency's proposal to form the Project Area. On April 16, 2008, the Planning Commission recommended that these boundaries be changed to delete certain parcels from the proposed Project Area that do not meet the CRL's definition of blight and are not otherwise necessary for effective redevelopment. This Report is based on these new Project Area boundaries.

GRC GRC GRC

This page intentionally left blank

GRC GRC GRC



16.0 REPORT AND RECOMMENDATION OF THE PLANNING COMMISSION

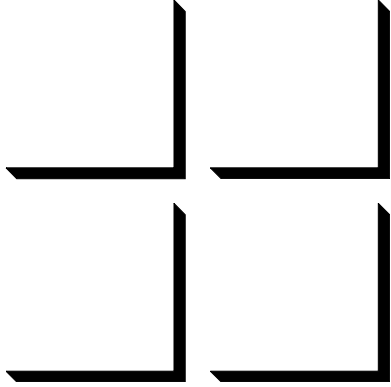
On April 16, 2008, at their regular meeting, the Planning Commission considered the proposed Redevelopment Plan (see Appendix C) pursuant to CRL Section 33346. The Planning Commission found the draft Redevelopment Plan to be in conformance with the City's General Plan, and recommended to the Agency and the City Council that the Redevelopment Plan be approved.

A copy of the resolutions finding conformance to the General Plan and the minutes from these meetings are available at the offices of the Agency.

GRC GRC GRC

This page intentionally left blank

GRC GRC GRC



17.0 SUMMARY OF INFORMATION FROM SECTION 33387

The CRL requires the City Council to call for the formation of a Project Area Committee (PAC) if a significant number of low- or moderate-income residents could be displaced due to redevelopment activities in the Project Area. Because the Agency does not have eminent domain authority, no displacement of residents will occur due to Agency actions. Therefore, there was no need to call for the formation of a PAC.

However, the City Council and Agency insisted that details about the proposed Redevelopment Plan, as well as redevelopment information in general, be shared with those in the community. Public participation is an important element in the success of any redevelopment effort, so a program to involve the community above and beyond the requirements of the CRL was engaged. It is anticipated that there will be ongoing community input as part of the redevelopment process.

17.1 PUBLIC MEETINGS HELD

- July 19, 2007 – Joint Meeting with the City Council and Planning Commission
- October 23, 2007 – Budget and Finance Committee hears a report on Redevelopment
- November 6, 2007 – City Council hears a report on redevelopment feasibility study
- November 7, 2007 – City Council selects a Survey Area.
- November 14, 2007 – Planning Commission chooses Preliminary Project Area boundaries

- November 21, 2007 – City Council adopts 2007-08 as the base year and reaffirms that eminent domain will not be a part of the project
- January 24, 2008 - Open House regarding Redevelopment
- March 4, 2008 – Presentation to the Lodi Improvement Committee
- May 6, 2008 - City Council review of Statement of Indebtedness
- May 6, 2008 - Forum on Redevelopment Held by the Lodi District Chamber of Commerce
- Various dates - Approximately six presentations to various service clubs and organizations regarding redevelopment were held from June 18, 2007 to the present
- Various dates - Two city-wide newsletter published and mailed October 17, 2007 and January 17, 2008

Introduction to Tax Increment and Redevelopment



July 19, 2007

Introduction to Tax Increment and Redevelopment

Introduction

Lodi needs more safe affordable housing for senior citizens. The City should help low-income homeowners pay for water meters. Motel business along Cherokee Lane is declining; the City should do something. Alleys are deteriorating. Lodi needs a new library. Lodi needs a new animal shelter. The Grape Bowl is a regional asset that if used correctly could spur economic development. The east side of Lodi needs a new community center and more parks. Why can't the Blakely Park Pool look nicer? Lodi should preserve older historic buildings. The storm and wastewater collection system is aging, obsolete and inadequate; why isn't the City doing anything? Overhead power lines should be buried underground. Lodi needs to improve its tax base and create more jobs.

These are just a sample of comments from Lodi residents about what they want and need from the City. The City constantly examines the range of services it provides and analyzes how to pay for and improve these services. With one major exception, Lodi fully utilizes the many forms of taxes and fees it receives. Lodi works closely to obtain funding from the State and Federal governments and the private sector to offer the range of services a "full-service city" provides.

The one major source of revenue that Lodi does not currently use is tax increment, which state law makes available to cities as outlined in the Health and Safety Code. Approximately 80 percent of all cities in California use tax increment revenue to meet the local needs of their residents and businesses. For every program, facility and service desired in the list above, tax increment is a tool that could be used to meet the need. It is a revenue source that does not raise taxes.

Tax increment is a component of the California Redevelopment Law. Over the next several months, the City Council will examine how tax increment can help Lodi. This may result in action to form a Redevelopment Project Area in Lodi. This paper is intended to provide a brief overview of tax increment and redevelopment and assist the Council and community members in further understanding this powerful locally-driven economic tool.

What is tax increment?

Tax increment is the amount of property tax revenues attributed to the incremental increases in tax value that are generated from development activity or transfers of property above a base amount within a designated redevelopment area called a project area.¹ It does not change the amount of taxes a property owner is required to pay. It does change how the extra property tax generated, “the increment,” is distributed. Lodi typically receives approximately 16 to 17 cents from every dollar of property tax paid. With tax increment, Lodi would be able to receive up to 75 cents from every dollar of new property tax generated above the base assessment; money that would otherwise go to the State of California or agencies that are the responsibility of the State of California.

Under the state’s tax increment rules, Lodi retains tax increment funds it must spend according to a plan, referred to as a Redevelopment Plan. The Redevelopment Plan can allow for expenditures for programs ranging from major rehabilitation of water, wastewater, and storm drain infrastructure to building a new library. There is only one absolute requirement with regard to the expenditure of tax increment funds: 20 percent of tax increment revenue must be spent on affordable housing.

Tax increment is only generated within a designated Redevelopment Area. This is a distinct geographic area. Although there are some exceptions, tax increment funds are spent within the Redevelopment Area. A defined and specific process must be followed in order to establish a Redevelopment Area. Certain conditions must exist and findings must be made. The area must be predominantly urbanized, and certain adverse physical and economic conditions must also be identified and exist to the point that they are a significant burden to the community.

Again, it is important to note that tax increment does not raise taxes. Tax increment is not an assessment or lien on property. Property taxes within the Redevelopment Area are governed by the same laws that limit property tax increases outside of the Area.

¹For example, tax on a property assessed at \$500,000 is \$5,000, with the City’s share (17 percent) amounting to \$850. Within a redevelopment project area, if the property is upgraded and sold for \$750,000, the new annual tax would be \$7,500. The city would receive 80 percent of the \$2,500 increase (\$2,000), plus the original \$850, amounting to \$2,850. Outside a redevelopment project, the city’s share would be \$1,275.

Other entities that are the financial responsibility of the State of California -- such as the county and school districts and other local special districts -- continue to receive all the tax revenues they were receiving before the tax increment was generated. Tax increment financing does not reduce revenue allocated to school districts. In fact, school districts and community college districts receive a portion of the redevelopment tax increments.² Existing State school funding formulas negate any gain or loss in property tax revenue, guaranteeing the state maintains a school's funding level, no matter what happens to the area's property taxes. Additionally, a large portion of the money the Agency shares with the School District will go to new facilities. This money would not be available otherwise.

In a nutshell, tax increment, through the adoption of a Redevelopment area, is an economic tool that could assist Lodi in addressing financial needs currently beyond the City's ability. It is a unique partnership that encourages economic stimulation so that growth in the tax base can provide funding for local improvements, create jobs, and improve health, safety, and quality of life in Lodi.

The History of tax increment and redevelopment in Lodi

A Redevelopment Agency must be formed to create a Redevelopment Project and collect tax increment.

According to California Health and Safety Codes,³ a Redevelopment Agency exists in every city and county in the State, but lies dormant until activated by ordinance.

Early in 2000, the City Council authorized the formation of a Lodi Redevelopment Agency and began the steps to form a Redevelopment Project area.

At that time, the City Council recommended establishing a project area in the oldest commercial and industrial areas of Lodi. Approximately 1,184 acres were identified as meeting the requirements that would allow the City to collect incremental taxes in exchange for stimulating growth and development in the area. In the spring of 2002, the City Council abandoned its plans to form a Project Area in response to citizen concerns and an initiative drive to put the project's future on the ballot.

² For redevelopment projects that were adopted before AB 1290, or January 1, 1994, the Agency negotiated separate agreements with each taxing entity. For those projects adopted on or after January 1, 1994, the total amount distributed to each entity is the same

³ Section 33100 of Health and Safety Code

It is interesting to note that, according to calculations prepared for the formation of the project area at that time, if the project would have been formed and if the development occurred in the fashion envisioned, the City would now have over \$400,000 in new revenue for this current fiscal year 2006-07. For comparison's sake, this would be like the city's share from \$40 million of new taxable sales.

One of the concerns expressed with redevelopment and tax increment in 2002 was a fear of eminent domain, the power to force someone to sell his property against his will. In order to address this concern on the part of members of the public and City Council, in 2006, the City Council adopted Ordinances 1775 and 1776 that eliminated the ability of the Lodi Redevelopment Agency to engage in the use of eminent domain for private use. It is expected that the City Council, if a project is adopted, will enact further restrictions and eliminate eminent domain by the Redevelopment Agency.

The Lodi Redevelopment Agency is still activated, but there is no project area and no change in the way property tax is distributed. The City Council will soon consider again exploring an area for a redevelopment project.

How and when will this occur?

It is anticipated that if the Council wishes to explore a Redevelopment Project Area, the public will have ample opportunity to voice opinions on what projects or activities should be funded with tax increment, how it could improve the community, and the project area boundaries. State law requires an environmental impact report on the project area and that several hearings by the Planning Commission and City Council be held prior to the area's adoption.

Currently, no boundary has been proposed for the Project Area. It is anticipated that an initial feasibility study will be conducted that will help select the boundaries of an area and prioritize activities before fully committing to the time and expense of adopting a Project.

It is anticipated that the entire process, if approved by the Agency, will take from 12 to 24 months.

Attached is "Exhibit A". It is a generalized preliminary schedule and listing of major work products required for plan adoption. It provides a detailed breakdown of the tasks required to form a project area.

What are the safeguards?

Because tax increment is a powerful tool, safeguards have been developed to ensure that activities are appropriate before receipt of tax increment funds. A report must be presented to the legislative body each year and an annual audit is required. An annual report must be submitted to the California Department of Housing and Community Development and other state agencies.

Redevelopment agencies must show that they have a financial obligation (debt) prior to the receipt of tax increment. This information is collected and transmitted to their counties in a document and is known as the Redevelopment Agency's "Statement of Indebtedness" or SOL. Without an SOL, the State would have no way to prevent any local agencies from collecting the increment and pocketing the money.

An Agency can incur an obligation in a number of different ways: it can borrow money from investors; it can borrow money from the City or engage in an agreement with the City; and/or it can incur obligations with private development interests. Debts of the Agency are not debts of the City.

Questions and Answers

Question: *Who oversees the expenditure of tax increment and redevelopment?*

Answer: The members of the elected City Council serving in the capacity as the governing board of the Redevelopment Agency. The community has full local control of additional revenues raised locally.

Question: *Will being in a Redevelopment Area depress my property values?*

Answer: There is no evidence that property values will be depressed. In fact, one might expect the opposite. With the possibility of greater revenue available for the area in certain circumstances, one might expect that property resale value could increase. Consider: if tax increment is used to improve water, sewer, or storm drains, does that seem likely to lower or increase property values? Would a new library help or hinder property values? The 1998 Dardia Report asserts that assessed valuation in Project Areas go up about twice the rate as similar uses outside the project area.

Question: *Does shifting property tax in the way tax increment works hurt schools?*

Answer: No. While school finance is complicated and can be confusing, the essentials are that the state provides funding based on average daily attendance. Additionally, the Agency shares a part of its tax increment with school districts which is “new” money to the schools and goes to school facilities.

Question: *How can I be sure that the City is not after my property?*

Answer: The City Council adopted ordinance 1775 and 1776 based upon local concerns to limit eminent domain. The City Council has not budged on the policies and provisions to protect property rights. Will adoption of a redevelopment plan change this policy direction? No. In fact, if a redevelopment plan is adopted that follows ordinances 1775 and 1776, it will be very difficult and costly to change from this existing policy direction. Also, new state law that became effective Jan. 1, 2007 requires redevelopment agencies to state their intentions regarding the use of eminent domain. The Redevelopment Agency will not use eminent domain to acquire property.

Question: *What about the small business?*

Answer: A small business can benefit from improved infrastructure. The Redevelopment Agency can absorb costs of building new parking lots, sidewalks and signs. The Agency can adopt programs specifically targeted to assist small businesses. The Redevelopment Agency has a specific obligation to give a preference to existing businesses and residents in development opportunities.

Question: *Will I have extra property maintenance obligations?*

Answer: No. Most redevelopment plans do not add to property maintenance requirements.

Question: *Is this more government regulation?*

Answer: No. The redevelopment plan will not change zoning or development standards – these will be, as they are now, covered by City ordinances. Redevelopment would provide funding and tools to assist with the funding of public improvements; tools to work voluntarily with property owners.

Question: *Doesn't the Redevelopment Agency just siphon money off the City that could have gone to the police and fire departments?*

Answer: No. The community will receive a greater amount of revenue with redevelopment than without redevelopment. By having the Agency bear the cost of public improvements, more of the City's General Fund can be made available for police, fire, and other services. Currently, the City is paying approximately \$1.7 million in debt service for public improvements that could have been financed via tax increment. If tax increment money would have been available, these financial resources would be supporting additional on-going services.

Question: *Will the City's General Fund backstop the Redevelopment Agency if it goes broke?*

Answer: No. The obligations of the Agency are not the obligations of the City. Debt issued by the Redevelopment Agency is evaluated on its own credit merits. The Agency must be able to prove its ability to pay its own debts. Investors in redevelopment agency debt understand and agree that the Agency must pay its own way and do not expect the City to provide relief.

Question: *How can redevelopment help provide affordable or senior housing?*

Answer: State law requires redevelopment agencies to spend at least 20 percent of the tax increment on affordable housing for seniors, the disabled and low- to moderate-income families. A redevelopment agency in Lodi could use that money to provide housing, subsidize rents, pay for repairs and help eligible residents become homeowners.

Question: *Doesn't the Redevelopment Agency take all the increases in property taxes from the County?*

Answer: No. State Law, (Health and Safety Code Section 33607.6) requires a percent of the growth in property tax within the Redevelopment Area be passed through to other taxing entities. The pass through amount is increased in three stages. The pass through begins at 25 percent of the total tax increment after the required amount for housing purposes is accounted for. On average, the taxing entities receive about 35 percent of the tax increment in a Project Area.

It is interesting to note that on April 17, 2007, during a discussion of the Grape Bowl, Board of Supervisors Chairman Victor Mow said, "They (Lodi) have an opportunity of a redevelopment project. They have not done so. This is a classic case of where redevelopment money might be the answer to do those things."

Question: *Does the Redevelopment Project end or sunset?*

Answer: Yes. The Agency cannot collect Tax Increment from the project for any longer than 45 years. It loses its authority to act after 30 years. Between 30 and 45 years the agency can collect debt only to fund housing programs and make payments under its obligations.

Exhibit “A”

An underlying assumption in the following schedule is that the redevelopment plan will have no eminent domain authority at all pursuant to Ordinances 1775 and 1776.

GENERALIZED PRELIMINARY SCHEDULE (DISCUSSION PURPOSES ONLY)		
Item	Approximate Date	Activity
1.	July 2007	City Council and Planning Commission hold a joint project kick-off and community forum. The forum intended to explain the Tax Increment redevelopment planning process, provide general background, get guidance from policy makers, and identify Study Area for the feasibility study. City Council may authorize execution of consultant contracts to commence study process or choose not to proceed.
2.	8/1/07	Initial field work and feasibility study started.
3.	9/6/07	First newsletter sent. This newsletter will announce the study and generally explain redevelopment and what it accomplishes.
4.	9/20/07	Hold first community meeting to explain redevelopment and how it works. Ask community to identify issues.
5.	10/3/07	City Council may formally adopt Survey Area after reviewing feasibility study recommendations, or may choose to terminate process.
6.	1/23/08	Planning Commission adopts Preliminary Plan.
7.	1/30/08	Agency prepares projections of the change in the number of residents and students within the Project Area.
8.	1/30/08	School district data requested by Agency. The districts prepare projections of any change in the need for school facilities within the Project Area over the lifetime of the plan.
9.	2/13/08	Project Area legal description and map prepared by civil engineer.
10.	2/20/08	<ul style="list-style-type: none"> • Agency sets base year for calculating tax increment. • Second newsletter sent out.

Item	Approximate Date	Activity
11.	2/27/08	<ul style="list-style-type: none"> • Preliminary plan circulated to taxing entities. • Legal description and map sent to taxing entities and State Board of Equalization. • School impact reports sent to State Department of Finance.
12.	5/12/08	County Auditor-Controller submits “base year” assessed valuation report to Agency and other taxing entities.
13.	5/21/08	Agency board authorizes circulation of Preliminary Report, Draft Redevelopment Plan and Draft EIR to taxing agencies.
14.	6/4/08	Preliminary Report, Draft Redevelopment Plan and Draft Program EIR circulated to taxing agencies and made available to the general public.
15.	7/21/08	End of Draft Program EIR review period.
16.	8/20/08	Agency re-sets base year for calculating tax increment revenues to FY2008-09.
17.	10/22/08	New “base year” assessed valuation report received from the County Auditor-Controller.
18.	1/7/09	<ul style="list-style-type: none"> • Agency Board sets joint public hearing date. • Agency Board adopts Relocation Method and Owner Participation Rules. • City Council agrees to joint public hearing date.
19.	1/14/09	<ul style="list-style-type: none"> • Planning Commission makes finding on whether the proposed Redevelopment Plan is consistent with the Lodi General Plan. • Planning Commission makes recommendation on proposed Redevelopment Plan. • Planning Commission could adjust (make Project Area smaller) boundaries at this point.
20.	1/16/09	Notice of public hearing and preliminary report sent to State Departments of Finance and Department of Housing and Community Development.
21.	2/2/09	<ul style="list-style-type: none"> • Report to City Council, Final Draft Redevelopment Plan and Final EIR available for public review. • Public hearing notices mailed out with newsletter.
22.	2/9/09	State Departments of Finance and Department of Housing and Community Development submit their comments if necessary.

Item	Approximate Date	Activity
23.	2/16/09	Final round of community meetings to explain the proposed Redevelopment Plan and explain the hearing process.
24.	3/4/09	Joint City Council/Redevelopment Agency public hearing held.
25.	3/18/09	Ordinance approving plan introduced after the Agency responds to written objections from the public.
26.	4/1/09	Second Reading.
27.	5/1/09	Ordinance approving plan is effective.
28.	6/30/09	End of legal challenge and referendum circulation period.

Major Reports and Work Products

The redevelopment planning process includes a number of major reports and work products before the City Council can go ahead with adopting the plan. Some of these are required by State law, while others are necessary for community involvement. For the most part, the Major Reports are required by the Community Redevelopment Law, while many of the Work Products are voluntary but necessary to a successful plan adoption program.

The following table shows major reports and work products, plus the estimated budget for each by involved firm. The Specialist category includes civil engineers, traffic studies, and other necessary special studies for the environmental impact report.

Report or Product	Description	Estimated Budget by Firm				Total
		GRC	Fraser & Assoc	SYCR	Specialist	
Major Reports						
Feasibility Study	This report assesses the overall feasibility of undertaking a redevelopment plan, taking into consideration the presence and extent of blight, financial feasibility, and community acceptance. Recommendations include initial boundaries, basic plan policies and whether to proceed.	\$14,000	\$7,500	\$4,000	0	\$25,500
Preliminary Plan	This is the formal initiation of the redevelopment planning process. The Preliminary Plan includes initial goals and objectives of the plan, initial detailed project area boundaries, and preliminary land use data. If Planning Commission adopts the Preliminary Plan, but the Agency decides whether to set a base year and formally circulate the Preliminary Plan.	\$3,500	0	\$700	0	\$4,200

Report or Product	Description	Estimated Budget by Firm					Total
		GRC	Fraser & Assoc	SYCR	Specialist		
School Impact Study	The school impact study is an estimate of the number of students to be generated during the lifetime of the redevelopment plan and an estimate of the new school facilities necessary. The Agency provides estimates of the number of new students, and the school districts are responsible for estimating facilities needs.	\$1,500	\$2,500	\$750	0		\$4,750
Legal Description and Map ⁴	This report is new in 2007.						
	Often overlooked, the legal description and map is prepared by an engineer, usually costs \$10,000 to \$20,000, and is critically important in determining which land is inside and outside the project area. A poorly prepared map can keep a project from going ahead.	\$2,500	0	0	\$17,500		\$20,000
Preliminary Report	This is the major factual document for the whole redevelopment planning program. It includes lot-by-lot and building-by-building research evaluation of physical and economic conditions in the proposed project area.	\$42,000	\$7,500	\$8,500	0		\$58,000

⁴ Includes the cost of civil engineer to prepare legal descriptions and maps.

Report or Product	Description	Estimated Budget by Firm				
		GRC	Fraser & Assoc	SYCR	Specialist	Total
Preliminary Report (cont'd)	The report also contains detailed economic data and fiscal projections for the project. The proposed redevelopment program is also outlined.					
Redevelopment Plan	The Redevelopment Plan is a document that regulates the operations of the redevelopment agency in the Project Area, sets detailed goals for the redevelopment program, authorizes specific projects, and sets various limits and caps. Minimum plan limits include the time limit for the effectiveness of the plan, not to exceed 30 years, the time limit for receiving tax increment (not more than 15 years longer than the plan's effectiveness, and the maximum amount of outstanding debt at any one time. Much of the plan's content is mandated by the Community Redevelopment Law.	\$5,000	\$1,500	\$2,000	0	\$8,500

Report or Product	Description	GRC	Estimated Budget by Firm				Total
			Fraser & Assoc	SYCR	Specialist		
Program Environmental Impact Report ⁵	Environmental impact reports are required for redevelopment plan adoptions. Given the long-term character of the redevelopment program, the EIR would look at the cumulative effects of the whole program, rather than the impacts of individual projects such as road construction or a new housing tract. The EIR is distributed at the same time as the Preliminary Report and the draft Redevelopment Plan, and analyzes the impacts of the overall program contained in the Redevelopment Plan.	\$35,000	0	\$5,000	\$15,000	\$55,000	
Relocation Method	As part of the redevelopment plan adoption program, the Agency has to adopt a set of guidelines for relocating individuals, families and businesses that may be dislocated as a result of redevelopment agency activities. The Agency has to have these guidelines whether or not any displacement is anticipated. They would be based upon and would be consistent with both State and Federal requirements.	\$4,500	0	\$850	0	\$5,350	

⁵ Includes estimated costs of specialist studies that may be required as part of CEQA analysis.

Report or Product	Description	Estimated Budget by Firm					Total
		GRC	Fraser & Assoc	SYCR	Specialist		
Owner Participation Rules	Redevelopment agencies are required to give preference to existing owners in participating in redevelopment activities. This document details how the Agency would solicit participation, and how it would evaluate participation proposals.	\$2,000	0	\$1,500	0		\$3,500
Report to City Council	This very large document is the final report to the City Council from the Redevelopment Agency. It combines all the above reports, plus a record of all meetings and communications with others such as other taxing agencies, community meetings, interest group meetings and the like.	\$12,500	\$5,000	\$6,500	0		\$24,000
Work Products							
Newsletters	At least three, and possibly four, newsletters will be mailed out to every known resident, property owner and business in the project area. The mailings can be expanded to include all of Lodi.	\$7,500	0	\$800	0		\$8,300
Community Meetings	Community input and education is critically important to the success of a redevelopment planning program and to the ultimate success of the program's implementation. As such, the community meetings are a central	\$12,000	\$8,000	0	0		\$20,000

Report or Product	Description	GRC	Estimated Budget by Firm				Total
			Fraser & Assoc	SYCR	Specialist		
Community Meetings (cont'd)	element in the overall redevelopment planning program. The meetings will include Power Point presentations, information packages for participants, maps, presentations, and question and answer sessions.						
Community Group Meetings	These meetings are presentations to individual community organizations. The groups could include almost any interested organization, from service organizations and business organizations to church groups and fraternal organizations. Presentation materials and handouts will be prepared for each meeting.	\$5,000	\$2,000	0	0	\$7,000	
Commission Representative Meetings	Representatives from City commissions or committees would meet on the planning program periodically. The purpose here is to get input from each City service group, to help identify programs, and to communicate with the overall City family.	\$5,000	\$1,000	0	0	\$6,000	
Planning Commission Meetings	The Planning Commission will meet about the redevelopment planning program at least two to three times. This includes adopting the Preliminary Plan, reviewing the	\$2,500	\$1,000	\$1,250	0	\$4,750	

17

Report or Product	Description	Estimated Budget by Firm				
		GRC	Fraser & Assoc	SYCR	Specialist	Total
Planning Commission Meetings (cont'd)	proposed Redevelopment Plan and supporting documents, evaluating consistency with the Lodi General Plan, making recommendations to the City Council/Redevelopment Agency, and initiating boundary changes as necessary.					
City Council/Agency Meetings	As the community's elected representatives, the City Council/Redevelopment Agency meet a number of times during the redevelopment planning program. At a minimum, major meetings include: <ul style="list-style-type: none"> • Kick-Off forum • Setting of base year • Adoption of Relocation Method and Owner Participation Rules • Setting of joint City Council/Agency public hearing • Joint public hearing • Ordinance adoption 	\$7,500	\$3,000	\$5,400	0	\$15,900
Expenses	Includes the cost of supplies, databases, printing, mailing, and other purchased items. Does not include travel-related costs.	\$15,000	\$1,500	\$500	\$1,000	\$18,000
Total		\$177,000	\$40,500	\$37,750	\$33,500	\$288,750

GRC GRC GRC

This page intentionally left blank

GRC GRC GRC

Introducción al redesarrollo e incremento de impuestos



10 de Julio de 2007

Introducción al redesarrollo e incremento de impuestos

Introducción

Lodi necesita viviendas más costeables y seguras para los ciudadanos mayores. La ciudad debería ayudar a los propietarios de bajos ingresos a pagar por los medidores de agua. El negocio de los hoteles en Cherokee Lane está disminuyendo; la ciudad debería hacer algo. Los callejones se están deteriorando. Lodi necesita una nueva biblioteca. Lodi necesita un nuevo refugio para animales. Grape Bowl es un recurso regional que podría estimular el desarrollo económico si se lo utiliza de manera adecuada. El lado este de Lodi necesita un nuevo centro comunitario y más parques. ¿Por qué no puede verse mejor la piscina del parque Blakely? Lodi debería preservar los edificios históricos más antiguos. El sistema de recolección de residuos hídricos y drenajes es viejo, obsoleto e inadecuado; ¿por qué no hace nada la ciudad? Las líneas de energía aéreas deberían estar bajo tierra. Lodi debe mejorar su base de impuestos y crear más empleos.

Éstos son solo algunos ejemplos de los comentarios de los habitantes de Lodi sobre lo que quieren y necesitan de la ciudad. La ciudad evalúa constantemente la gama de servicios que brinda y analiza cómo pagar y mejorar estos servicios. Con una importante excepción, Lodi utiliza al máximo las diversas formas de impuestos y cargos que recibe. Lodi trabaja estrechamente para obtener financiación de los gobiernos estatales y federales y el sector privado, a fin de ofrecer la gama de servicios que brinda una “ciudad de servicios completos”.

La mayor fuente importante de ingresos que Lodi no utiliza actualmente es el incremento de impuestos, que la ley estatal pone a disposición de las ciudades como se establece en el Código de Salud y Seguridad. Aproximadamente 80% de las ciudades de California usan los ingresos del incremento de impuestos para satisfacer las necesidades locales de sus residentes y negocios. El incremento de impuestos es una herramienta que podría utilizarse para satisfacer cada programa, instalación y servicios deseados de la lista anterior. Es una fuente de ingresos que no aumenta los impuestos.

El incremento de impuestos es un componente de la Ley de Redesarrollo de California. En los próximos meses, el ayuntamiento de la ciudad evaluará la forma en que el incremento de impuestos puede ayudar a Lodi. Esto puede conllevar

medidas para formar un área de proyecto de redesarrollo en Lodi. Este documento tiene el fin de ofrecer un breve resumen del redesarrollo e incremento de impuestos, y ayudar a los miembros de la comunidad y el ayuntamiento a comprender mejor esta poderosa herramienta económica dirigida localmente.

¿Qué es el incremento de impuestos?

El incremento de impuestos es la cantidad de ingresos por impuestos a la propiedad que se atribuyen a los incrementos del valor de los impuestos generados por la actividad de desarrollo o por transferencias de propiedad por encima de un monto base dentro de una área de redesarrollo designada, llamada área del proyecto¹. El incremento de impuestos no modifica el monto de impuestos que un propietario debe pagar por su propiedad. Sí modifica la forma en que se distribuyen los impuestos a la propiedad adicionales que se generan, es decir, “el incremento”. En general, Lodi recibe aproximadamente entre 16 y 17 centavos por cada dólar de impuestos a la propiedad. Con el incremento de impuestos, Lodi podría recibir hasta 80 centavos por cada dólar de nuevos impuestos a la propiedad generado por encima de la valuación base; dinero que, de otra forma, se destinaría al Estado de California o a organizaciones que son responsabilidad del Estado de California.

Según las normas de incremento de impuestos del estado, Lodi retiene fondos provenientes del incremento de impuestos que debe gastar de acuerdo con un plan, llamado plan de redesarrollo. El plan de redesarrollo puede permitir gastos en programas que van desde la rehabilitación fundamental de la estructura del agua, los residuos hídricos y los desagües hasta la construcción de una nueva biblioteca. Sólo existe un requisito absoluto con respecto al gasto de los fondos del incremento de impuestos: 20% de los ingresos del incremento de impuestos deben gastarse en viviendas costeables.

Otras entidades que son responsabilidad financiera del Estado de California — como los distritos de escuelas y condados, y otros distritos locales especiales—

¹Por ejemplo, los impuestos sobre una propiedad valuada en \$500,000 son de \$5,000, y el porcentaje de la ciudad (17%) equivale a \$850. Dentro de un área de proyecto de redesarrollo, si la propiedad asciende de categoría y se vende a \$750,000, el nuevo impuesto anual sería de \$7,500. La ciudad recibiría 80% del aumento de \$2,500 (\$2,000), además de los \$850 originales, lo que equivaldría a \$2,850. Fuera de un proyecto de redesarrollo, el porcentaje de la ciudad sería de \$1,275.

continúan recibiendo todos los ingresos de impuestos que recibían antes de que se generara el incremento de impuestos. La financiación del incremento de impuestos no reduce los ingresos asignados a los distritos escolares. De hecho, los distritos de las escuelas y universidades comunitarias reciben una parte del incremento de impuestos para el redesarrollo². Las fórmulas de financiación de las escuelas estatales existentes anulan cualquier pérdida o ganancia en los ingresos de los impuestos a la propiedad, lo que garantiza que el estado mantiene el nivel de financiación de la escuela, sin importar lo que suceda con los impuestos de propiedad del área.

En resumen, el incremento de impuestos, a través de la adopción de un área de redesarrollo, es una herramienta económica que podría ayudar a Lodi a resolver las necesidades financieras que actualmente se encuentran más allá de la capacidad de la ciudad. Se trata de una asociación única que estimula el desarrollo económico, de modo que el crecimiento de la base impositiva pueda generar fondos para mejoras locales, crear empleos y mejorar la salud, seguridad y calidad de vida en Lodi.

La historia del redesarrollo y el incremento de impuestos en Lodi

Para crear un proyecto de redesarrollo y recaudar el incremento de impuestos, debe formarse un organismo de redesarrollo.

Según los Códigos de Salud y Seguridad de California³, existe un organismo de redesarrollo en todos los condados y ciudades del estado, pero permanece inactivo hasta que se lo activa con una ordenanza.

En la primera parte del año 2000, el ayuntamiento de la ciudad autorizó la formación de la agencia de redesarrollo y tomó los primeros pasos de formar una área de proyecto.

En aquel entonces, el ayuntamiento de la ciudad recomendó establecer un área de proyecto en las áreas industriales y comerciales más antiguas de Lodi. Se identificó que aproximadamente 479 hectáreas cumplían con los requisitos que permitirían que la ciudad recaudara impuestos incrementales a cambio de estimular el

² Para los proyectos de redesarrollo que se adoptaron antes de AB 1290, o el 1 de enero de 1994, el organismo negoció acuerdos por separado con cada entidad impositiva. Para los proyectos adoptados en o a partir del 1 de enero de 1994, el monto total distribuido a cada entidad es el mismo.

³ Sección 33100 del Código de Salud y Seguridad.

crecimiento y desarrollo en el área. A mediados de 2002, el ayuntamiento de la ciudad abandonó sus planes para formar un área de proyecto en respuesta a las preocupaciones de los ciudadanos respecto del dominio eminente y a una iniciativa para someter a votación el futuro del proyecto.

Es interesante señalar que, según los cálculos preparados para la formación del área de proyecto en aquel entonces, si el proyecto se hubiera formado y si el desarrollo hubiera sucedido de la manera prevista, ahora la ciudad tendría cerca de \$400,000 de nuevos ingresos para el año fiscal actual de 2006-07. En términos comparativos, esto sería como el porcentaje que recibiría la ciudad de \$40 millones de nuevas ventas gravables.

Una de las preocupaciones expresadas respecto del incremento de impuestos y redesarrollo en 2002 fue el temor del dominio eminente, la capacidad de obligar a alguien a vender su propiedad contra su voluntad. A fin de resolver esta preocupación de parte de los miembros del público y el ayuntamiento de la ciudad, en 2006 el ayuntamiento de la ciudad adoptó las Ordenanzas 1775 y 1776 que eliminan la capacidad del organismo de redesarrollo de Lodi de participar del uso del dominio eminente para uso privado. Se espera que, si se adopta un proyecto, el ayuntamiento de la ciudad promulgue más restricciones y elimine el dominio eminente de la agencia de redesarrollo.

La Agencia de redesarrollo de Lodi aún está activado, pero no existe un área de proyecto ni se modificó la forma en que se distribuyen los impuestos a la propiedad. El ayuntamiento de la ciudad pronto volverá a considerar la exploración de un área para el proyecto de redesarrollo.

¿Cuándo y cómo sucederá esto?

Se anticipa que si el ayuntamiento desea explorar un área de proyecto de redesarrollo, el público tendrá amplias oportunidades de expresar su opinión sobre los proyectos y actividades que deberían financiarse con el incremento de impuestos, la forma en que esto mejoraría la comunidad y los límites del área de proyecto. La ley estatal requiere que se presente un informe del impacto ambiental sobre el área de proyecto y que el comité de planificación y el ayuntamiento de la ciudad celebren varias audiencias antes de la adopción del área.

Se anticipa que todo el proceso, si recibe la aprobación del organismo, llevará entre 12 y 24 meses.

¿Cuáles son las garantías?

Dado que el incremento de impuestos es una herramienta poderosa, se han desarrollado garantías para asegurar que las actividades sean apropiadas antes de que se reciban los fondos del incremento de impuestos. Todos los años debe presentarse un informe al cuerpo legislativo y debe realizarse una auditoria anual. Debe presentarse un informe anual al Departamento de Desarrollo Comunitario y Viviendas de California y a otros organismos estatales.

La Agencia de redesarrollo deben demostrar que tienen una obligación financiera (deuda) antes de la recepción del incremento de impuestos. Esta información es recopilada y transmitida a los condados en un documento, y se la conoce como “Declaración de adeudamiento” de la Agencia de redesarrollo o SOI (por su sigla en inglés). Sin las SOI, el estado no tendría forma de impedir que las Agencias locales recaudaran el incremento de impuestos y se queden con el dinero.

Preguntas y Respuestas

Pregunta: *¿Quién supervisa los gastos del incremento de impuestos y el redesarrollo?*

Respuesta: Los miembros electos del ayuntamiento de la ciudad que se desempeñan como directorio la Agencia de redesarrollo. La comunidad tiene absoluto control local de los ingresos adicionales que se recaudan localmente.

Pregunta: *¿Mi propiedad perderá parte de su valor por encontrarse en un área de redesarrollo?*

Respuesta: No existen pruebas de que se reduzcan los valores de las propiedades. De hecho, cabría esperar lo contrario. Con la posibilidad de mayores ingresos disponibles para el área en ciertas circunstancias, cabría esperar que aumentase el valor de reventa de la propiedad. Considere lo siguiente: si el incremento de impuestos se usa para mejorar el agua, las cloacas o los drenajes, ¿le parece probable que eso reduzca o aumente el valor de la propiedad? Una nueva biblioteca, ¿ayudaría o perjudicaría al valor de la propiedad? El Informe Dardia de 1998 asegura que la valuación de un área de proyecto aumenta alrededor de dos veces más que otros usos similares fuera del área de proyecto.

Pregunta: *¿El cambio de los impuestos a la propiedad que conlleva el incremento de impuestos perjudica a las escuelas?*

Respuesta: No. Si bien las finanzas de las escuelas son complicadas y pueden ser confusas, lo fundamental es que el estado provee la financiación según la asistencia diaria promedio.

Pregunta: *¿Cómo puedo estar seguro de que la ciudad no quiere mi propiedad?*

Respuesta: El ayuntamiento de la ciudad adoptó las ordenanzas 1775 y 1776 basándose en las preocupaciones locales para limitar el dominio eminente. Además, una nueva ley estatal que entró en vigencia el 1 de enero de 2007 requiere que las Agencias de redesarrollo declaren sus intenciones respecto del uso del dominio eminente. El organismo de redesarrollo no utilizará el dominio eminente para adquirir propiedades.

Pregunta: *¿Qué hay de las pequeñas empresas?*

Respuesta: Una pequeña empresa puede beneficiarse de la mejora de infraestructura. La Agencia de redesarrollo puede absorber los costos de construir nuevos estacionamientos, aceras y señales. La Agencia puede adoptar programas específicamente destinados a ayudar a pequeñas empresas. La Agencia de redesarrollo tiene la obligación específica de otorgar preferencia a los residentes y empresas existentes en las oportunidades de desarrollo.

Pregunta: *¿Tendré que asumir obligaciones adicionales de mantenimiento de propiedad?*

Respuesta: No. La mayoría de los planes de redesarrollo no agregan requisitos de mantenimiento de propiedad.

Pregunta: *¿Esto implica una mayor regulación de gobierno?*

Respuesta: No. El plan de redesarrollo no cambiará la división en zonas ni las pautas de desarrollo: éstos se encontrarán, al igual que ahora, a cargo de las ordenanzas de la ciudad. El redesarrollo brindaría financiación y herramientas para contribuir con la financiación de las mejoras

públicas, herramientas para trabajar voluntariamente con los dueños de las propiedades.

Pregunta: *¿La Agencia de redesarrollo no se limita a sacar dinero de la ciudad que podría haberse destinado a los departamentos de bomberos y policía?*

Respuesta: No. La comunidad recibirá una mayor cantidad de ingresos con el redesarrollo que sin él. Si un Agencia se hace cargo del costo de las mejoras públicas, la policía, los bomberos y otros servicios pueden disponer de una mayor parte del fondo general de la ciudad.

Pregunta: *¿El fondo general de la ciudad respaldará al la Agencia de desarrollo si éste se declara en quiebra?*

Respuesta: No. Las obligaciones de la Agencia no son las obligaciones de la ciudad. La deuda emitida por la Agencia de redesarrollo se evalúa según sus méritos de crédito. La Agencia debe ser capaz de demostrar que puede pagar sus propias deudas.

Pregunta: *¿Cómo puede el redesarrollo ayudar a ofrecer viviendas costeables o viviendas para los ancianos?*

Respuesta: La ley federal requiere que las agencias de redesarrollo gasten al menos 20% del incremento de impuestos en viviendas costeables para los ancianos, los minusválidos y las familias de ingresos bajos o moderados. Una agencia de redesarrollo en Lodi podría utilizar ese dinero para ofrecer viviendas, subsidiar alquileres, financiar reparaciones y ayudar a los residentes que reúnan los requisitos a convertirse en propietarios.

Pregunta: *¿La Agencia de redesarrollo no se lleva todos los incrementos de impuestos a la propiedad del condado?*

Respuesta: No. La ley federal, (Código de Salud y Seguridad, Sección 33607.6) requiere que un porcentaje del crecimiento de los impuestos a la propiedad dentro del área de redesarrollo se traslade a otras entidades tributarias.

Es interesante señalar que el 17 de abril de 2007, durante una discusión del Grape Bowl, el presidente del directorio de supervisores, Victor Mow, dijo: “[Lodi] tiene la oportunidad de [establecer] un proyecto de redesarrollo. No lo ha hecho. Éste es un caso típico en que el dinero de redesarrollo podría ser la respuesta a estas cosas”.

Pregunta: *¿El proyecto de redesarrollo finaliza o concluye?*

Respuesta: Sí. El organismo no puede recaudar incrementos de impuestos del proyecto durante más de 45 años. Pierde el poder para actuar luego de 30 años. Entre los 30 y 45 años, La Agencia puede recaudar deudas solo para financiar programas de viviendas y realizar pagos según sus obligaciones.

GRC GRC GRC

This page intentionally left blank

GRC GRC GRC

ٹیکس میں اضافہ اور
ازسر نوتعمیر و ترقی کا تعارف



July 12, 2007

ٹیکس میں اضافہ اور ازسر نو تعمیر و ترقی

تعارف

لوڈئ کو بزرگ شہریوں کے لئے محفوظ ترین اور حیب پر بار نہ گذرنے والے رہائشی مکانوں کی ضرورت ہے۔ لوڈئ سٹی کو کم آمدنی والے مالکان مکان کو پانی کے میٹر کے سلسلے میں مدد کرنی چاہئے۔ چروکی لین سے متصل علاقوں میں موٹل کا کاروبار دم توڑ رہا ہے اس لئے لوڈئ سٹی کو مزید کچھ کرنا چاہئے۔ مکانوں کے درمیان روشوں کی حالت بھی ابتر ہے۔ لوڈئ کو ایک نئی لا ئبریری کی بھی ضرورت ہے۔ لوڈئ کو جانوروں کے لئے ایک نئے باڑے کی ضرورت ہے۔ انگور کی بیلین مقامی ورثہ ہیں جن کا صحیح استعمال اقتصادی ترقی کو چار چاند لگا سکتا ہے۔ لوڈئ کے مشرقی گوشے کو ایک نئے اجتماعی مرکز اور کچھ مزید پارکوں کی ضرورت ہے۔ بلیکلی پارک بول مزید خوب صورت نظر کیوں نہیں آتا؟ لوڈئ کو پرانی تاریخی عمارتوں کو محفوظ رکھنا چاہئے۔ سیلاب اور استعمال شدہ پانی کے ذخیرہ کا نظام کافی پرانا، فرسودہ اور ناکافی ہو چکا ہے۔ اس کے لئے لوڈئ سٹی کچھ کیوں نہیں کر رہی ہے؟۔ بجلی کی پالائی لائنوں کو زیر زمین لے جانا چاہئے۔ نیز لوڈئ کو اپنے ٹیکس کی بنیاد کو مزید بہتر بنا کے نئی آسا میاں پیدا کرنا چاہئے۔

یہ ہیں لوڈئ میں رہائش پذیر لوگوں کے تبصروں کے کچھ نمونے جن سے پتہ چلتا ہے کہ وہ لوڈئ سے کیا چاہتے ہیں اور کس بات کے متقاضی ہیں۔ لوڈئ سٹی اپنی طرف سے مہیا کردہ خدمات کے دائرہ کار کا مسلسل جائزہ لیتی رہتی ہے اور اس بات کا تجزیہ کرتی ہے کہ ان کو کس طرح بچا لا یا جائے اور کس طرح ان میں بہتری پیدا کی جائے۔ صرف ایک بڑے استشنائ کے ساتھ، لوڈئ متعدد نوعیت کے موصول شدہ ٹیکسوں اور فیسوں کو پوری طرح بروئے کار لا تی ہے۔ لوڈئ صوبائی اور وفاقی حکومتوں اور برانچوں سے فنڈ حاصل کرنے کے لئے پورا جتن کرتی ہے تاکہ اپنی طرف سے مہیا کردہ خدمات کے دائرہ کار کو وسیع کر کے ایک مکمل خدمات مہیا کرنے والی سٹی بن جائے۔

ایک بڑا ذریعہ آمدنی جسے لوڈئ فی الحال استعمال نہیں کر رہا ہے وہ ہے ٹیکس میں اضافہ جسے صوبائی قانون کے مطابق ہر سٹی کو فراہم کیا جاتا ہے اور جس کی تصریح صحت اور سلامتی کے قانون کے طور پر کی گئی ہے۔ کیلی فورنیا کے تقریباً 80 فیصد سٹی اس اضافی ٹیکس آمدنی کو اپنے شہریوں کی مقامی ضرورتوں اور کاموں پر خرچ کرتی ہیں۔ مذکورہ بالا فہرست میں مندرج ہر مطلوبہ پروگرام، سہولت اور خدمت کی ضروریات کو اس اضافی ٹیکس سے ہی پورا کیا جاتا ہے۔ یہ آمدنی کا ایک ایسا ذریعہ ہے جو برائے ٹیکسوں کو بڑھاتا بھی نہیں ہے۔

ٹیکس میں اضافہ کیلی فورنیا کی ازسر نو تعمیر و ترقی کا ایک جز ہے۔ آئندہ کئی مہینوں تک سٹی کونسل اس بات کا جائزہ لے گی کہ ٹیکس میں اضافہ سے لوڈئ کو کس طرح فائدہ پہنچ سکتا ہے۔ اس کا نتیجہ لوڈئ کی حدود میں ایک از سر نو ترقیاتی منصوبہ کی شکل میں برآمد ہو سکتا ہے۔ اس مقالے کا مقصد ٹیکس میں اضافے اور ازسر نو تعمیر و ترقی پر ایک سرسری نظر ڈالنا ہے نیز کونسل اور کمیونٹی کے اراکین کو مقامی ذرائع سے حاصل شدہ اس قدر طاقتور ہتھیار کے بارے میں مزید جان کاری فراہم کرنا ہے۔

ٹیکس میں اضافہ کیا ہے؟

ٹیکس میں اضافہ جائداد آمدنی کی وہ مقدار ہے جو ٹیکس کی قدر و قیمت میں ترقیاتی سرگرمیوں یا ایک مقررہ تعمیر نو کے علاقے میں جسے پروجیکٹ ایریا (1) کہا جاتا ہے کی اصل قیمت سے زیادہ بڑھوتری کے نتیجے میں حاصل ہو تی ہے۔ یہ جائداد کے مالکان کی طرف سے ادا کئے جانے والے ٹیکسوں میں کوئی تبدیلی نہیں پیدا کرتا ہے بلکہ یہ اس بات میں تبدیلی پیدا کرتا ہے کہ کس طرح جائداد کا اضافی ٹیکس پیدا کیا جاتا ہے اور پھر اس "اضافہ" کو کس طرح تقسیم کیا جاتا ہے۔ لوڈڈ کو جائداد ٹیکس ادا کئے جانے والے ہر ڈالر میں سے بطور خاص تقریباً 16 سے 17 سینٹ مل جاتے ہیں۔ اس اضافی ٹیکس کے ساتھ لوڈڈ کو بنیادی تخمینہ سے زیادہ پیدا کردہ نئے جائداد ٹیکس کے ہر ڈالر میں سے تقریباً 80 سینٹ مل جائیں گے۔ بصورت دیگر یہ بیسہ کیلی فورنیا ریاست کو چلا جاتا یا ریاست کیلی فورنیا کی ذمہ دار ایجنسیوں کو دے دیا جاتا۔

اس ریاست میں لاگو ٹیکس میں اضافہ کے قانون کے بموجب لوڈڈ جس اضافی فنڈ کو اپنے پاس رکھے گی اسے وہ اس منصوبہ کے مطابق خرچ کرے جسے از سر نو ترقیا تی منصوبہ کے نام سے جانا جاتا ہے۔ اس از سر نو ترقیا تی منصوبہ کے تحت پانی کی فراہمی کی باز آبادکاری کے بڑے منصوبوں، استعمال شدہ پانی اور سیلاب کے پانی کی نکاسی کے نظام سے لے کر ایک نئی لائبریری کے قیام تک کے منصوبے شامل ہیں۔ اس اضافی ٹیکس کو خرچ کئے جانے کے لئے صرف ایک شرط کو پورا کرنا ضروری ہے اور وہ ہے کہ اس اضافی ٹیکس کی آمدنی کو ایسے مکانات پر صرف کیا جائے جن کا حصول عام لوگوں کے لئے قابل برداشت ہو۔ ان کے علاوہ دیگر لوازمات ریاست کیلی فورنیا کی مالی ذمہ داریاں ہوتی ہیں جیسے کاؤنٹی اور اسکول ڈسٹرکٹس اور دیگر مقامی مخصوص ڈسٹرکٹس وغیرہ تو ان کو اس اضافی ٹیکس کی پیداوار سے پہلے کی طرح ٹیکس کی تمام آمدنی حسب سابق بدستور ملنی رہی گی۔ اضافی ٹیکس کی سرمایہ کاری کی وجہ سے اسکول ڈسٹرکٹ کے لئے مخصوص شدہ آمدنی میں کوئی کٹوتی نہیں ہوتی ہے۔ حقیقت تو یہ ہے کہ اسکول ڈسٹرکٹس اور کمیونٹی کالج ڈسٹرکٹس دونوں کو اس از سر نو ترقی کی اضافی آمدنی کا ایک حصہ ملتا ہے (2)۔ اسٹیٹ اسکول فنڈنگ کا موجودہ فارمولہ جائداد ٹیکس آمدنی میں کسی اضافے یا خسارے کو نہیں ماننا اور اس بات کی ضمانت دیتا ہے کہ اسٹیٹ اسکول کے فنڈ کی سطح کو برقرار رکھے گا اس بات سے قطعی قطع نظر کہ اس علاقے کی جائداد ٹیکس کا کیا ہوتا ہے۔

(1) مثال کے طور پر کسی جائداد کا تخمینہ 500,000 ڈالر کا لگا کے اس پر 5000 ڈالر کا ٹیکس عائد کیا گا تو اس میں سٹی کا حصہ (17 فی صد کے حساب سے) 850 ڈالر بنتا ہے۔ اگر اس کے از سر نو ترقیاتی منصوبے کے علاقے میں واقع ہونے کی وجہ سے اس کی قدر و قیمت بڑھا کے اسے 750000 ڈالر میں فروخت کر دیا جاتا ہے تو اب اس پر عائد شدہ ٹیکس 7500 ڈالر ہوگا۔ سٹی کو اصل ٹیکس 850 ڈالر کے علاوہ اس اضافی رقم 2500 ڈالر پر 80 فی صد اضافہ سے 2000 ڈالر ملیں گے جس کی بدولت اسے اس کے حصہ کی کل رقم 2850 ڈالر موصول ہوگی۔ لیکن اس از سر نو ترقیاتی منصوبہ کے باہر علاقوں میں سٹی کا حصہ صرف 1275 ڈالر ہی ہوگا۔

(2) ان از سر نو ترقیاتی منصوبوں کے لئے جن کی داغ بیل 1290 یا یکم جنوری 1994 سے قبل یا بعد میں ڈال دی گئی ہو اور پھر ایجنسی نے ہر ٹیکس کا الگ سے معاہدہ کیا ہو تو ایسے تمام منصوبوں پر جن کی داغ بیل یکم جنوری یا اس کے بعد ڈالی گئی ہو، اس اضافی رقم کو تمام حق داروں کے درمیان برابر برابر تقسیم کر دیا جائے گا۔

حاصل کلام یہ ہے کہ ٹیکس کی اضافی رقم جو از سر نو ترقیاتی علاقہ کا منصوبہ شروع کرنے کی بدولت موصول ہو تی ہے ایک ایسا اقتصادی ہتھیار ہے جو لوڈڈ کی ان موجودہ مالی ضروریات کا مداوا کر سکتی ہے جو فی الحال اس کی دسترس سے باہر تھیں۔ یہ ایک لاجواب شراکت ہے جو اقتصادی نمو کی ہمت افزائی کرتی ہے تاکہ بنیادی ٹیکس میں بڑھوتری سے مقامی فلاح و بہبود کے لئے فنڈ مہیا کیا جاسکے، کام کی نئی آسامیاں پیدا کی جاسکیں اور لوڈڈ میں صحت، سلامتی اور طرز زندگی کو مزید بہتر بنایا جاسکے۔

لوڈڈ میں اضافی ٹیکس اور از سر نو تعمیر و ترقی کی تاریخ

ایک از سر نو تعمیر و ترقی ایجنسی قائم کی جائے جو نئے ترقیاتی منصوبے بنائے اور اضافی ٹیکس بھی وصول کرے۔

کیلی فورنیا صحت و سلامتی قوانین کے بموجب ایک از سر نو تعمیر و ترقی ایجنسی ریاست کے ہر شہر اور کاؤنٹی میں موجود ہوتی ہے لیکن وہ غیر فعال پڑی رہتی ہے جب تک کہ اسے آرڈر نینس کے ذریعہ فعال نہ بنایا جائے۔

2000 کے آغاز میں سٹی کونسل نے لوڈئ ازسر نو تعمیر و ترقی ایجنسی کی تشکیل کی اجازت دی جس کے نتیجے میں ری ڈیولپمنٹ پروجیکٹ ایریا کی تشکیل کے اقدامات شروع ہوئے۔ اسی زمانے میں سٹی کونسل نے لوڈئ کے قدیم ترین تجارتی اور صنعتی علاقے میں ایک پروجیکٹ ایریا قائم کرنے کی سفارش کی۔ تقریباً 1184 ایکڑ زمین کو اس ضرورت کو پورا کرنے کے لئے مخصوص کیا گیا جس کی بدولت لوڈئ سٹی اس علاقے میں روز افزوں نشوونما اور ترقی کے بدلے میں اضافی ٹیکس وصول کرے گی۔

2002 کے موسم بہار میں سٹی کونسل نے اپنے اس پروجیکٹ ایریا کے منصوبے کو ترک کر دیا کیوں کہ شہریوں نے اس سے نمایاں بالا دستی قائم ہونے پر تشویش کا اظہار کرتے ہوئے اس مسئلے کے مستقبل کو بیلٹ بکس کے ذریعہ حل کرنے کے لئے ابتدائی مہم کر دی تھی۔

دلچسپ اور قابل ملاحظہ بات یہ ہے کہ پروجیکٹ ایریا کی تشکیل کے وقت جو تخمینہ لگایا گیا تھا اس کے مطابق اگر یہ منصوبہ تشکیل پا جاتا اور ترقیاتی کام اسی نہج پر چل پڑے ہوتے جس طرح کی منصوبہ بندی کی گئی تھی تو سٹی کو موجودہ مالی سال 2006-7 کے دوران 400,000 ڈالر سے زیادہ کی نئی آمدنی ہوتی۔ صرف موازنہ کے لئے یہ بتایا جا رہا ہے کہ یہ 40 ملین ڈالر کی نئی قابل ٹیکس فروخت میں سے سٹی کا اپنا حصہ ہوتا۔

2002 میں اضافی ٹیکس اور از سر نو تعمیر و ترقی کے خلاف ظاہر کی گئی تشویش کے پس پشت ظاہری بالا دستی کا امکانی خوف تھا جس کا مطلب تھا کسی کو اس کی مرضی کے خلاف جائداد بیچنے پر مجبور کرنا۔ سٹی کونسل اور عوام کی اس تشویش کو رفع کرنے کے لئے 2006 میں سٹی کونسل نے آرڈی نینس 1775 اور 1776 پاس کیا جس کی رو سے لوڈئ از سر نو تعمیر و ترقی ایجنسی کو یہ اختیار نہ ہوتا کہ وہ نجی استعمال کے لئے ظاہری بالا دستی کو بروئے کار لائے۔ اس بات کی توقع کی جاتی ہے کہ سٹی کونسل، اگر کوئی منصوبہ پروان چڑھتا ہے تو مزید پابندیاں عائد کرے گی اور از سر نو تعمیر و ترقی ایجنسی کی طرف سے کسی بھی امکانی بالا دستی کے خطرے کو بالکل ہی ختم کر دے گی۔

(3) صحت اور سلامتی قانون کا باب 33100

لوڈئ از سر نو تعمیر و ترقی ایجنسی کی فعالیت ابھی تک برقرار ہے لیکن اس کے پاس کوئی پروجیکٹ ایریا نہیں ہے اور نہ ہی جائداد ٹیکس کی تقسیم کے نظام میں کوئی تبدیلی رونما ہوئی ہے۔ سٹی کونسل از سر نو تعمیر و ترقی کے منصوبہ کے لئے کسی علاقے کی تلاش کا کام جلد ہی دوبارہ شروع کرنے پر غور و خوض کرنے والی ہے۔

یہ کیسے اور کب ہوگا؟

اس بات کا خدشہ ہے کہ اگر سٹی کونسل از سر نو تعمیر و ترقی کے منصوبہ کے لئے کسی علاقے کی تلاش کی خواہش ظاہر کرتی ہے تو عوام کو اس بات پر اظہارِ رای کے بہترے مواقع ملیں گے کہ ٹیکس اضافہ کا فنڈ کن منصوبوں اور کن سرگرمیوں پر خرچ کیا جائے، اس سے سماج کے حالات اور پروجیکٹ ایریا کے حدود کو کس طرح بہتر بنایا جاسکتا ہے۔ ریاستی قانون کی رو سے پروجیکٹ ایریا پر ماحولیاتی اثرات کی رپورٹ بھی ضروری ہوتی ہے اور اس علاقے کی منظوری سے قبل پلاننگ کمیشن اور سٹی کونسل کی طرف سے متعدد سماعتیں بھی ہوتی ہیں۔

اس بات کی توقع ہے کہ ان سارے عملیات میں، اگر یہ کونسل کی طرف سے منظور کر لی جاتی ہیں، 12 سے 24 ماہ کی مدت لگ سکتی ہے۔

تحفظات کیا ہیں؟

چونکہ اضافی ٹیکس ایک طاقتور ہتھیار ہے اس لئے اس کے لئے بہت سے تحفظات بھی فراہم کئے گئے ہیں تاکہ اس اضافی ٹیکس فنڈ کی وصولیابی سے قبل اس بات کو یقینی بنایا جاسکے کہ یہ سرگرمیاں مناسب ہیں۔ ہر سال قانون ساز ادارے کو ایک رپورٹ پیش کرنی ہوتی ہے اور سالانہ آڈٹ بھی کرانا پڑتا ہے۔ ایک سالانہ رپورٹ کیلی فورنیا ڈپارٹمنٹ آف ہاؤسنگ اینڈ کمیونٹی ڈیولپمنٹ اور دیگر اسٹیٹ ایجنسیز کو بھی پیش کرنا ضروری ہے۔

اضافی ٹیکس حاصل کرنے سے پہلے از سرنو ترقیاتی ایجنسیوں کو یہ دکھانا ضروری ہے کہ ان پر مالی ذمہ داریاں (قرض) ہیں - یہ اطلاع ان سے لیکے ایک دستاویز کی شکل میں ان کی کاؤٹیز کو منتقل کر دیا جاتا ہے جسے عام طور سے از سرنو ترقیاتی ایجنسیوں کے "اسٹیٹمنٹ آف انڈیٹڈنس" یا ایس او آئی کے نام سے جانا جاتا ہے۔ اس ایس او آئی کے بغیر اسٹیٹ کسی بھی مقامی ایجنسی کو اضافی ٹیکس وصول کرنے اور پھر اسے خود ہی ڈکار جانے سے روک نہیں سکتا۔

سوالات و جوابات

سوال: اضافی ٹیکس اور از سرنو تعمیر و ترقی کے مصارف کی نگرانی کون کرتا ہے؟
جواب: سٹی کونسل کے منتخب اراکین جو ری ڈیولپمنٹ ایجنسی کے گورننگ بورڈ کی حیثیت سے کام کرتے ہیں - اس طرح مقامی طور پر حاصل شدہ اضافی آمدنی پر کمیونٹی کو پورا پورا اختیار حاصل ہوتا ہے۔

سوال: کیا ری ڈیولپمنٹ ایریا میں رہائش میری جائداد کی قدر و قیمت کم کر دیتی ہے؟
جواب: اس بات کا کوئی ثبوت نہیں ہے کہ اس سے جائداد کی قدر و قیمت گھٹ جاتی ہے۔ حقیقت اس کے برعکس ہے۔ مخصوص حالات میں اس علاقے کی آمدنی زیادہ ہو نے کے امکان سے ایک شخص بجا طور پر یہ توقع کر سکتا ہے کہ اس کی دوبارہ فروخت کی قدر و قیمت بڑھ جائے گی۔ آپ خود ہی سوچیں اگر اضافی ٹیکس کی آمدنی سے پانی، سیوریج، اور سیلاب پانی کی نکاسی کے نظام کو بہتر بنایا جاتا ہے تو اس سے جائداد کی قدر و قیمت گھٹے گی یا اور بڑھے گی؟ کیا ایک نئی لائبریری جائداد کی قدر و قیمت گھٹائے گی یا بڑھائے گی؟ - 1998 میں پیش کردہ دردیا رپورٹ نے اس بات پر زور دیا ہے کہ پروجیکٹ ایریا میں تخمیں شدہ جائداد کی قدر و قیمت پروجیکٹ ایریا سے باہر کی اسی طرح کی زیر استعمال جائدادوں کے مقابلے میں دوگنی ہو تی ہیں۔
سوال: کیا اضافی ٹیکس کے نظام عمل کے مطابق جائداد ٹیکس کو منتقل کرنے سے اسکولوں کو نقصان پہنچتا ہے؟

جواب: نہیں - جب کہ اسکولوں کی سرمایہ کاری کا نظام پیچیدہ اور قدرے مبہم بھی ہے۔ لیکن بنیادی بات یہ ہے کہ اسٹیٹ انہیں یومیہ حاضری پر مبنی تناسب کے حساب سے فنڈ مہیا کرتا ہے۔

سوال: مجھے کیسے یقین ہو کہ سٹی میری جائداد کے بیچھے ہاتھ دھو کے نہیں پڑی ہے؟

جواب: سٹی کونسل نے آرڈی نینس 1775 اور 1776 پاس کیا ہے جو ظاہری بالا دستی کو یا بجولوں کرنے کے لئے مقامی تشویش پر مبنی ہے۔ مزید برآں اسٹیٹ کا نیا قانون جو یکم جنوری 2007 سے نافذ العمل ہو چکا ہے ری ڈیولپمنٹ ایجنسیز کو یہ حکم دیتا ہے کہ وہ ظاہری بالا دستی کی بابت اپنے عزائم کی وضاحت کریں۔ ری ڈیولپمنٹ ایجنسی ظاہری بالا دستی کو جائداد کے حصول کے لئے استعمال نہیں کرے گی۔
سوال: چھوٹے کاروبار کا کیا ہوگا؟

جواب: چھوٹے کاروبار ضروری بنیادی ڈھانچوں پر استوار ہوتے ہیں۔ ری ڈیولپمنٹ ایجنسی نئے پارکنگ کی تعمیر پیدل چلنے کے راستے اور علامات وغیرہ بنانے کے مصارف برداشت کر سکتی ہے - ایجنسی بطور خاص چھوٹے درجے کے کاروبار میں مدد فراہم کرنے کا پروگرام بنا سکتی ہے۔ نیز ری ڈیولپمنٹ ایجنسی کا یہ مخصوص فریضہ بھی ہے کہ وہ موجودہ کاروبار اور رہائش پذیر لوگوں کو ترقیاتی مواقع میں ترجیح دے۔

سوال: کیا مجھ پر جائداد کی دیکھ ریکھ کی مزید ذمہ داری عائد ہو تی ہے؟
جواب: نہیں - اکثر و بیشتر ترقیاتی منصوبوں میں جائداد کی دیکھ ریکھ کے اخراجات کا کوئی ذکر نہیں ہوتا۔

سوال: کیا کچھ حکومت کے بھی قانونی نظام ہیں؟

جواب : نہیں - ری ڈیولپمنٹ پلان زوننگ یا ترقیاتی معیار کو تبدیل نہیں کرے گا۔ یہ جوں کے توں بر قرار رہیں گے جن کا انتظام سٹی آرڈی نینس کے ذریعہ چلے گا۔ ری ڈیولپمنٹ کا فنڈ عوامی فلاح و بہبود کے کاموں پر صرف کیا جائے گا نیز جائداد کے مالکوں کے ساتھ مل کے رضاکارانہ کاموں کے لئے مہمیز کا کام بھی کرے گا -

سوال : کیا ری ڈیولپمنٹ ایجنسی سٹی کے پیسوں کو بضم نہیں کرجاتی ، بصورت دیگر یہ رقم پولیس اور فائر ڈپارٹمنٹ پر خرچ کی جاتی؟

جواب : نہیں - سماج کو ری ڈیولپمنٹ کے ذریعہ بغیر ری ڈیولپمنٹ کے مقابلے میں کہیں زیادہ آمدنی ہوتی ہے۔ چونکہ ایجنسی عوامی فلاح و بہبود کے جملہ اخراجات برداشت کرتی ہے اس لئے سٹی کے بیشتر عام فنڈ پولیس، فائر اور دیگر خدمات کی طرف منتقل کئے جاسکتے ہیں -

سوال : کیا ری ڈیولپمنٹ ایجنسی کی مالی حالت خستہ ہونے پر اس کو ملنے والا سٹی کا جنرل فنڈ روک لیا جائے گا؟

جواب : نہیں - ایجنسی کی ذمہ داریاں سٹی کی ذمہ داریاں نہیں ہیں۔ ری ڈیولپمنٹ ایجنسی کی طرف سے جاری ہونے والے قرضوں کا تخمینہ اس کے اپنے قرضوں کے معیار پر لگا یا جاتا ہے - ایجنسی کو اپنے قرضوں کی ادائیگی کی صلاحیت رکھنے کا ثبوت دینا ہوتا ہے -

سوال : کس طرح ری ڈیولپمنٹ بزرگ لوگوں کے لئے جیب پر بار نہ ہونے والی رہائش مہیا کرنے میں مدد کرے گی؟

جواب : ریاستی قانون کے مطابق ری ڈیولپمنٹ ایجنسیوں کے لئے اضافی ٹیکس کا کم سے کم 20 فی صدی بزرگ لوگوں ، معذوروں اور محدود آمدنی والے خاندانوں کے لئے قابل برداشت اور ان کی جیبوں پر بار نہ بننے والے مکانات کی فراہمی ضروری ہے۔ لوڈز کی ری ڈیولپمنٹ ایجنسی بھی ان پیسوں کو رہائشی مکانوں ، با رعایت کرایوں پر خرچ کرسکتی ہے اور اس سے مرمت بھی کرا سکتی ہے نیز اس سے مستحق رہائش پذیر لوگوں کو مالک مکان بننے میں مدد بھی فراہم کر سکتی ہے -

سوال : کیا ری ڈیولپمنٹ ایجنسی جائداد ٹیکسوں کے تمام اضافوں کو کاؤنٹی سے نہیں لیتی ہے؟

جواب : نہیں - ریاستی قانون (صحت و سلا متی کا قانون مادہ 33607.6) کے بموجب ری ڈیولپمنٹ علاقوں کی جائداد ٹیکس میں نموکا کچھ فیصدی کچھ دیگر ٹیکس اداروں کو بھی منتقل کیا جائے گا -
یہ بات قابل ملاحظہ ہے کہ 17 اپریل 2007 میں انگور کی کاشت پر بحث کے دوران سپروائزر بورڈ کے چیرمین وکٹر مو نے کہا تھا کہ ان کو (لوڈئ کو) از سر نو تعمیر و ترقی کا ایک بہترین موقع میسر ہے جسے انہوں نے ابھی تک انجام نہیں دیا ہے - یہ از سر نو تعمیر و ترقی کے لئے مخصوص رقم کو خرچ کرنے کی ایک مثالی جگہ ہے -

GRC GRC GRC

This page intentionally left blank

GRC GRC GRC

Redevelopment: A tool to build a better Lodi

The City of Lodi has many needs, from more affordable housing to fixing aging buildings and stimulating business on Cherokee Lane. The City constantly examines the range of services it provides and how to pay for and improve them. Like every other California city, Lodi has a tool available to reach some of those unmet needs, but unlike most other cities, it's unused at the moment. That tool is redevelopment, which allows cities to keep a greater share of property taxes paid when values climb.

State redevelopment law allows the city to use tax generated from higher property values to pay for repairs and improvements that would otherwise require higher fees on ratepayers or drain funds from other city services. With a redevelopment plan, Lodi would keep five times as much property tax generated by higher values than without, freeing up more money for services such as police protection and park maintenance. Redevelopment does not raise taxes, it merely changes the way a portion of the tax revenue is distributed.

Four of the county's six other cities have active redevelopment agencies, ranging from the largest, Stockton, to one of smallest, Ripon (population 14,575).

At 6 p.m. Thursday, July 19, the Lodi City Council will have a special meeting at the Lodi Boys & Girls Club, 275 E. Poplar St., to discuss the possibility of creating a redevelopment project in Lodi. In the meantime, the following may help answer some questions you may have about the process:

Question: What's in it for me?

Answer: If you own property within a redevelopment area, redevelopment funds could go toward street and sidewalk upgrades, underground pipe repairs, and assistance programs to improve your home, building or surrounding properties. State law requires redevelopment agencies spend at least 20 percent of their funds on affordable housing. The list of eligible programs hasn't been established yet, so your participation is valuable as the community considers how redevelopment may benefit Lodi.

Question: Where is the redevelopment area?

Answer: If the City Council decides to pursue a redevelopment project, that



JULY 2007

Redevelopment: A tool to build a better Lodi (cont.)

will be something decided with the public's help. A 2002 proposal, which identified most of east Lodi within a proposed project area, may be a starting point in the discussion. Sales tax collections, an indicator of economic strength, have actually declined in that geographic area in recent years.

Question: Isn't this just more government?

Answer: It is a separate agency, but it's still the Lodi City Council members who make the decisions, such as how money is spent, after the public has its say in an open meeting.

Question: Could the redevelopment agency take my home on behalf of a private developer?

Answer: Not in Lodi. The city has an ordinance that prohibits it from using eminent domain powers to seize property for a private party's benefit. If a redevelopment project is adopted, it will be set up with that prohibition in place, something a future City Council could not reverse without a lengthy process and public input.

Question: Didn't the city already try this in 2002?

Answer: Almost. The process started and then stopped after a citizen's group forced the issue to the ballot. The Lodi City Council decided the time wasn't right and dropped the matter. But had the project moved forward, the Lodi Redevelopment Agency would be receiving roughly \$500,000 a year for local projects.

Question: How soon can I expect to see changes in my neighborhood?

Answer: It won't be overnight. The city receives additional dollars only when property values increase. But over time, as more redevelopment funds are invested, the beneficial effect should be compounded.

For more information, contact the City Manager's office: 333-6700.



JULY 2007

Volume 1, Issue 1

October 2007

CITY OF LODI

REDEVELOPMENT NEWS



WHAT'S NEXT IN THE PROCESS?

- Lodi's Budget and Finance Committee will review survey areas at 6:30 p.m., Monday, Oct. 29, at the Carnegie Forum, 305 W. Pine St.
- The City Council may select a Survey Area on Nov. 7.
- If the City Council adopts a Survey Area, the Lodi Planning Commission will select a Project Area on Nov. 14.
- Additional studies, public meetings will follow.

Redevelopment's promise in Lodi

Lodi could generate up to \$131 million for local improvements through redevelopment without raising taxes, according to a study that determined the feasibility of a redevelopment project in the city.

Of 163 cities in California with populations greater than 50,000, Lodi is one of only eight that do not have active redevelopment agencies. The state, through the tool of redevelopment, allows California cities to keep a greater share of property tax payments to fix deteriorating parts of their communities where the private sector isn't willing or able.



Cherokee Lane could benefit from redevelopment, a tool commonly used by cities to revitalize struggling neighborhoods.

The city's Budget and Finance Committee will meet at 6:30 p.m., Monday, Oct. 29, at the Carnegie Forum, 305

W. Pine St., to review the Survey Area proposals and recommend a preferred option. *(Continued on page 2)*

Business owner: Lodi needs RDA

Business owners who once sent clients and customers to Beth Kim's hotel on Cherokee Lane now direct them to other parts of town or even outside Lodi.

They've told Kim, a second-generation hotelier, they no longer feel comfortable with the city's aging business dis-

"The question isn't 'Should we or shouldn't we?' The question is, 'Why aren't we doing this?'"

Beth Kim, business owner

trict, which thrived for years as a stop for travelers before Highway 99 was a freeway.

"The last two to four years, we've seen a lot of changes on Cherokee Lane in regards to blight," Kim said. "I could dump \$100,000 or more into my building, but I don't know if I would get the return on my investment."

(Continued on page 3)

Redevelopment News



Redevelopment could improve Lodi's aging neighborhoods.

'Blight' finding won't hurt values

The definition of "blighted area" in redevelopment law isn't a knock on your property, but a condition common in cities' older neighborhoods. It can mean, of course, an unsafe and deteriorated building, but it can mean plenty of other things, too.

For instance, a house could contain lead paint or asbestos, which were commonly used in homes through the 1960s. It could have faulty or inadequate utilities, which is a common complaint of residents in east Lodi.

Blight can include a commercial building with in-

adequate parking, undersized parcels in commercially zoned areas, or a poor mix of adjacent uses, such as homes next to light industrial shops.

Also meeting the blight test, according to redevelopment law, is an area lacking grocery stores,

(Continued on page 3)

THE LARGER SURVEY AREA HAS THE POTENTIAL TO RAISE \$131 MILLION VS. \$83 MILLION FOR THE SMALLER SURVEY AREA IN TODAY'S DOLLARS.

HOW MUCH MONEY DO LOCAL CITIES RAISE A YEAR WITH TAX INCREMENT?

- Stockton \$12 million
- Manteca \$11.3 million
- Tracy \$5.9 million
- Ripon \$2.8 million
- Lodi \$0

PAGE 2

Redevelopment's promise (cont.)

(Continued from page 1)

tion to the City Council.

In July, Lodi's City Council voted unanimously to study the potential for a redevelopment project in the city. The first step is a feasibility study (at www.lodi.gov/redevelopment.html) that recommends that the City Council adopt the larger of two proposed survey areas in order to maximize local control of local tax dollars.

Most of Lodi, from Sacramento Street east, is included in the larger Survey

Area A. The smaller one, Survey Area B, focuses on commercial and industrial corridors in east Lodi, but would raise significantly fewer dollars, \$83 million compared to \$131 million in the larger area. Both estimates are based on 2007 dollars.

A redevelopment project in Lodi could include:

- Incentives to spur private investment in east Lodi
- Programs to attract and retain businesses

- Rehabilitation loans and grants
- Upgrading streets, sidewalks and other infrastructure, such as water meters.
- Affordable housing programs.

The Lodi Chamber of Commerce, the Hispanic Business Committee, the Lodi Visitors and Conference Bureau and the Lodi Unified School District have indicated initial support for redevelopment.

How is redevelopment funded?

Redevelopment agencies use a tool called tax increment to raise money.

In most cases, when property taxes go up as a result

of a higher assessment, the additional revenue is distributed among taxing agencies at the same rate as the original amount.

But in a redevelopment

project area, most of the additional property tax goes to the redevelopment agency for needed projects.

It's all done without new taxes.

'Blight' finding (cont.)

(Continued from page 2)

pharmacies and banks; one with residential overcrowding, such as some apartment-dense blocks; and one that has abnormally low lease rates and vacant storefronts.

Redevelopment is a tool local governments use to

reinvest in their communities and raise property values when the traditional free-enterprise model alone won't. Redevelopment raises the value of older neighborhoods not only by direct investments in the community, but by providing incentives for the private sector to invest as well.



Redevelopment can bring new money into a community for public projects without raising taxes.



Hotelier Beth Kim supports redevelopment.

Business owner (cont.)

(Continued from page 1)

An active redevelopment agency project is overdue in Lodi, according to Kim, who added that her once-healthy repeat business has dwindled in recent years because of Cherokee Lane's surroundings.

Kim said Lodi is missing an

opportunity, noting other cities in San Joaquin County are keeping a greater share of property tax dollars through redevelopment.

"It seems were throwing away funds," Kim said. "This is money that needs to stay in Lodi. The question isn't, 'Should we or shouldn't we?' The question

is, 'Why aren't we doing this?'"

Retail sales in the Cherokee Lane business district have fallen in terms of inflation-adjusted dollars, while increasing in every other major district, according to state tax records.

No eminent domain if Lodi adopts redevelopment

Some people are concerned that redevelopment could turn a residential block into a shopping center by using the power of eminent domain.

In Lodi, it can't happen.

Last year, Lodi's City Council passed an ordinance prohibiting the city from using

condemnation powers to seize property for a private party's benefit. If Lodi adopts a redevelopment project, that prohibition will be included and become something a future City Council could not do without a lengthy public process.

Some are also concerned

that schools and other entities funded by property taxes will lose funding.

Redevelopment does not reduce any payments, but continues to provide a share of property tax increases to those entities.

A Lodi Unified School District official spoke at

the City Council's July 19 meeting on redevelopment to let city officials know the district would not oppose the effort.

A successful redevelopment project will help, not hurt, all public agencies by boosting property values in an area where they have historically lagged.



City Manager's Office
P.O. Box 3006
Lodi, CA 95241

Phone: 209-333-6700
Fax: 209-333-6807
www.lodi.gov

LIVABLE, LOVABLE LODI

How a Redevelopment Project can help Lodi

The City of Lodi has many needs, from fixing aging buildings to stimulating business on Cherokee Lane. Like every other California city, Lodi has a tool available to reach some of those unmet needs, but it's unused at the moment. That tool is redevelopment, which allows cities to keep a greater share of property taxes paid when assessed values climb.

State redevelopment law allows the city to use tax generated from higher property values to pay for repairs and improvements that would otherwise require higher fees on ratepayers or drain funds from other city services. With a redevelopment plan, Lodi would keep

five times as much property tax generated by higher values than without, freeing up more money for services such as police protection and park maintenance. **Redevelopment does not raise taxes**, it merely changes the way a portion of the tax revenue is distributed.

If you own property within a redevelopment area, project funds could go toward repairing streets, underground pipes and programs to help you improve your home or commercial building.

Additionally, state law makes redevelopment agencies spend 20 percent of

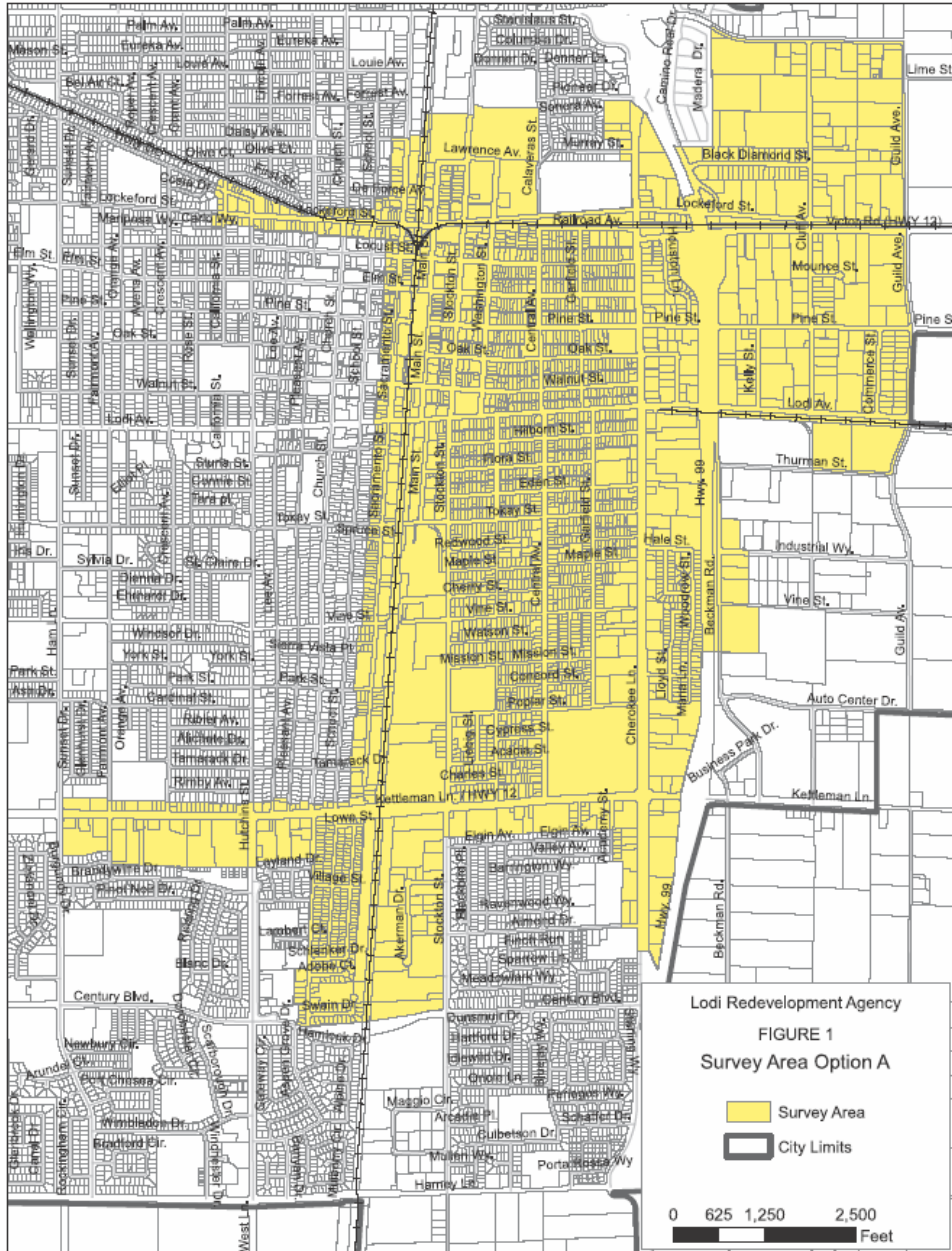
their funds on affordable housing.

Even if you don't own property within the redevelopment project area, you could still receive indirect benefits. More attractive business properties generate more sales tax, a benefit to all of Lodi; and redevelopment dollars can fund repairs that otherwise come out of the city's general fund, leaving more money for citywide programs.

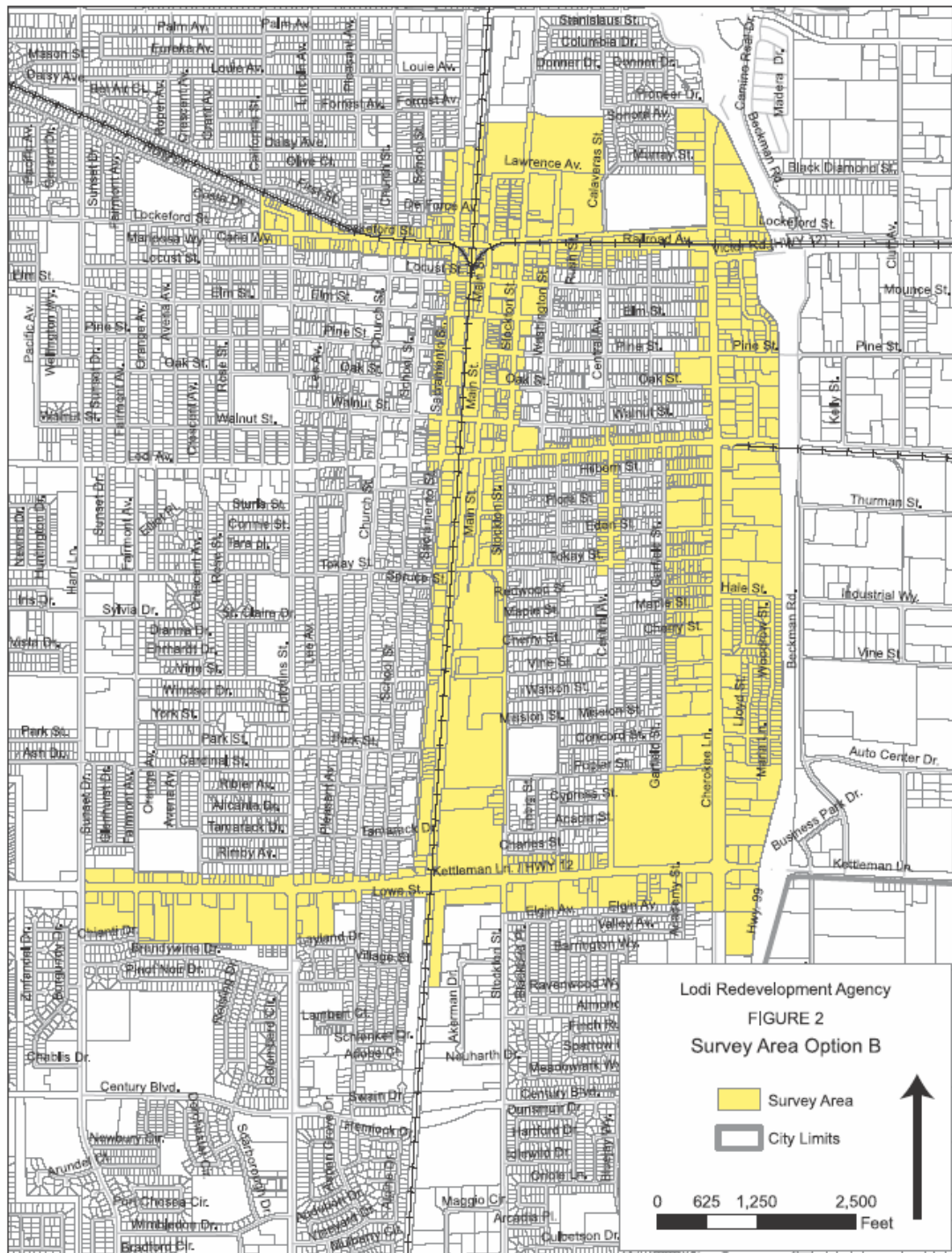
Lodi spends \$1.7 million a year repaying loans on public facilities that would have been eligible for redevelopment funding!

Visit www.lodi.gov/redevelopment.html or e-mail redemption@lodi.gov for more information.

Survey Area A: Potential to raise \$131 million for redevelopment



Survey Area B: Potential to raise \$83 million for redevelopment





REDEVELOPMENT NEWS

Volume 2, Issue 1

January 2008

INSIDE:



Cities throughout the state embrace revitalization tool.

WHERE IS THE COMMUNITY IMPROVEMENT AREA IN LODI?

It includes most of Lodi from Sacramento Street east and the major commercial corridors. See www.lodi.gov for more details.

COMING UP:

Community Open House this month: Have an idea of what projects you want funded by the Lodi Community Improvement Project? City staff and redevelopment experts want to hear your suggestions on how to make Lodi a better community.

Thursday, January 24, 6 p.m. to 8 p.m.
LOEL Center
105 S. Washington St.

How can redevelopment help?

Offer your ideas for improving Lodi at Jan. 24 open house

What is your vision for a better Lodi?

Is it more jobs? Landscaped medians or more parks? More affordable housing for struggling families?

Whatever you think will help Lodi, you'll have an opportunity to share your opinion with other residents and your city representatives at a workshop on Jan. 24 that's

How can we improve our city?

When: 6 p.m., Thursday, January 24.

Where: LOEL Center, 105 S. Washington St.



Redevelopment could bring new economic life to parts of Lodi

designed to let Lodi residents say what they'd like from a potential redevelopment project.

Additionally, Lodi residents can learn how other California cities are using *Continued inside*

Adopting plan a lengthy, public process

City boards held these eight public meetings in 2007 in which redevelopment was on the agenda and members of the public were provided an opportunity to comment:

- **May 30:** Lodi City Council approves \$300,000 in 2007-2008 budget to cover RDA's preliminary expenses.
- **July 19:** City Council, in a joint meeting with the Planning Commission at the Lodi Boys & Girls Club, unanimously approves hiring experts to do necessary studies, analyses.
- **Oct. 23:** Budget & Finance Committee hears report on redevelopment.

• **Oct. 29:** Budget & Finance Committee endorses larger Survey Area for redevelopment project.

• **Nov. 6:** City Council hears a report on redevelopment feasibility study.



The July 19 redevelopment meeting was translated into Spanish and Urdu.

- **Nov. 7:** City Council chooses Survey Area.
- **Nov. 14:** Planning Commission chooses Survey Area as preliminary Project Area boundaries.
- **Nov. 21:** City Council adopts 2007-2008 as the base year for the Lodi Community Improvement Project and reaffirms that eminent domain will not be part of the project.

Public participation is the key to the future of a redevelopment project in Lodi.



**Lodi Community Improvement Project Open House on Jan. 24
6 p.m., LOEL Center, 105 S. Washington St.**

PRESORTED
FIRST-CLASS MAIL
U.S. POSTAGE
PAID
STOCKTON, CA
PERMIT NO. 262

City Manager's Office
City of Lodi
P.O. Box 3006
Lodi, CA 95241

Phone: 209-333-6700
Fax: 209-333-6807
www.lodi.gov

redevelopment@lodi.gov

CITY OF LODI SPECIAL REPORT

Q&A

Didn't the Lodi City Council already approve a redevelopment project?

No. The City Council has only taken the first of many steps needed before Lodi has a community improvement area. The City Council, acting as the city's Redevelopment Agency, established preliminary boundaries at its Nov. 7 meeting. The area extends as far north as

Turner Road, as far south as Century Boulevard and includes most areas east of Sacramento Street. A map is available at www.lodi.gov. The area will not increase, but may decrease as it's studied further.

Other studies and reports are required before Lodi's elected officials determine if the Lodi Community Improvement Project is feasible. That may happen later in 2008.

What's this about?

It's about Lodi using all the tools at its disposal to improve the community. Most cities in California and many counties use redevelopment as a way to keep a greater share of property taxes in their communities. That money is then used for job creation, low-income housing programs, investments in streets and sidewalks, and financial incentives to spur investment in neglected neighborhoods. It's a tool that's been around for 60 years in California. Of 163 cities in California with

a population of 50,000 or greater, Lodi is one of only eight that do not have active redevelopment projects.

What would Lodi do with redevelopment?

That's yet to be determined. The city has an open house scheduled at 6 p.m. on Jan. 24, 2008 at the LOEL Center, 105 S. Washington St., to hear from residents what goals they have for the Lodi Community Improvement Project. State law, however, requires at least 20 percent of

redevelopment funds go toward affordable housing needs.

Where is the money coming from?

Redevelopment agencies receive a share of property tax when values rise within designated areas. That difference is considered the tax increment, the chief funding source of redevelopment in California.

It's the only way to boost revenue for projects that benefit the community without raising taxes or fees.



REDEVELOPMENT NEWS

Redevelopment's familiar face in California

Many of the state's famous landmarks, destinations located in project areas



The Carson Mansion is at the heart of Eureka's downtown improvements.

New IKEA stores in Emeryville and West Sacramento generate revenue for those cities.



In nearly every California city attempting to revitalize aging neighborhoods, the financial tools available through redevelopment are the keys to success. A look at many other cities provides examples of what Lodi could do by keeping a greater share of property tax within the community.

Redevelopment has a 60-year history in California with myriad success stories.

Stockton transformed its waterfront in the past

decade with a ballpark, sports arena and other public facilities. West Sacramento's redevelopment agency helped pay for Raley Field and lured IKEA to open a store there. Fresno has used redevelopment for a \$1 billion private and public investment in its downtown, including shopping centers, new federal and state courthouses and affordable housing projects.

Downtowns in Santa Barbara, San Diego and Santa Cruz also have been the beneficiaries of redevelopment, ranging from street and façade improvements to draw tourists, to providing the financial resources to Santa Cruz to rebuild after the 1989 Loma Prieta earthquake.

Much of east Lodi has been included within the preliminary boundaries of a potential redevelopment project area, with Cherokee Lane and other commercial and industrial corridors identified as areas

needing financial assistance. Residential property owners also could be eligible for financial help if Lodi had a redevelopment project.



Downtown Santa Cruz was rebuilt after the '89 earthquake with the help of redevelopment.



Modesto's Redevelopment Agency contributed to the Gallo Center for the Arts.



Fresno's Chukchansi Stadium, home of the San Francisco Giants' Class AAA team.



Monterey's famed Cannery Row is within one of that city's project areas.



Redevelopment transformed State Street in Santa Barbara.



San Diego's Gaslamp project brought new life to an aging neighborhood.



The Hotel Del Coronado is within a RDA project area.

Improvement project could provide needed incentives

Why is Lodi considering a community improvement area?

Existing city revenue can't support basic government services AND the investment needed to revitalize aging neighborhoods and commercial corridors. Without redevelopment, spending more on new sidewalks, water meters, low-income housing and other projects would mean less police and fire protection and possible elimination of other services that benefit all of Lodi.

Your city is exploring the Lodi Community Improvement Project because a program could fund the

millions of dollars needed to bring some parts of Lodi up to current standards and create jobs. Private property owners either don't have the money or the incentive to invest in some areas of Lodi because surrounding conditions won't make that investment profitable.

If approved by the City Council, the Lodi Community Improvement Project would include programs aimed at improving conditions in certain neighborhoods, creating incentives for private investment.

As explained in the city's October 2007 newsletter, the Lodi Community Improvement

Project excludes eminent domain. Homeowners would not be required to sell to any private developer.

Adopting the Lodi Community Improvement Project is also the only way for the city to increase tax revenue without a tax hike. As property within the project boundaries is assessed at a higher value by the San Joaquin County Assessor's Office, a greater share of the new tax portion goes to a pool

that funds improvement projects. A study last fall concluded Lodi stands to collect at least \$131 million (as valued in today's dollars) for redevelopment projects over 45 years if City Council members approve the plan later this year.

Jan. 24 workshop

Continued from Page 1

redevelopment to improve their communities. Guest speakers and brochures and literature from other cities will be featured.

The tentative area for the Lodi Community Improvement Project was selected by the Lodi Planning Commission on Nov. 14. The area

extends as far north as the Mokelumne River, as far south as Century Boulevard, with most of Lodi east of Sacramento Street included. The boundaries also contain commercial corridors along Lockeford Street, Lodi Avenue and Kettleman Lane. The final area can be no larger than this, but it could be smaller.

If the Lodi Community Improve-

ment Plan is adopted, Lodi will receive a greater share of future property taxes than without a redevelopment project. It's a way for Lodi to increase revenue without raising taxes.

That's money the community could use to create jobs and for new sidewalks, water meters, street improvements, graffiti abatement, and a variety of programs designed to help

lower-income residents improve their properties. It could go toward housing subsidies, rebates for home-repair projects, and it could provide incentives for businesses to locate within the project boundaries, providing jobs and opportunities in an area neglected by the free-enterprise model.

For more information, visit www.lodi.gov.

GRC GRC GRC

This page intentionally left blank

GRC GRC GRC



Redevelopment. For a Better Lodi

California has nearly 400 active redevelopment agencies in communities throughout the state, including five cities in San Joaquin County. While they are probably the least understood local government entities, redevelopment agencies represent the most important tool a community has to help breathe new life into areas in need of revitalization, economic development and new opportunity. Redevelopment activities create jobs and expand opportunities for business, provide affordable housing and homeownership opportunities for families most in need, reduce crime, improve infrastructure and lead cleanup of run-down areas. Below are some key facts about redevelopment agencies and their contributions to California communities.

Redevelopment. Without it, important community projects don't get done.

An abandoned gas station doesn't turn into retail space overnight and affordable housing doesn't build itself. Revitalization of deteriorated areas doesn't just happen — someone has to make it happen. **The core function of redevelopment agencies is to serve as the catalyst for community revitalization projects in which the private sector otherwise would not be involved.**

Reflecting the community's needs:

Redevelopment agencies are local government entities usually controlled by the City Council, County Board of Supervisors or a separate appointed board (all accountable to the public). Because they are locally governed, redevelopment agencies are in the best position to identify what a community needs and to work with private investors on local projects to meet those needs.

How it works:

When redevelopment agencies make improvements to targeted areas, property values within those areas rise, resulting in an increase in property tax revenues. State law allows redevelopment agencies to use a portion of this increase to repay financial obligations they must incur in order to rehabilitate an area. Redevelopment agencies use these funds to build public improvements and infrastructure, clean up contaminated soil and do other things necessary to improve the conditions of the property. Redevelopment's commitment of funds attracts private investment and creates a chain reaction, such as job creation, where the ultimate economic output is larger than the original public investment.

In Lodi, redevelopment could mean:

- ▶ Affordable housing and homeownership
- ▶ Job growth
- ▶ Revived business districts
- ▶ Revitalization of run-down neighborhoods
- ▶ Crime reduction
- ▶ Upgraded streets, lighting, sewers and water lines
- ▶ Clean up of contaminated property
- ▶ Parks
- ▶ Libraries
- ▶ Fire and police stations and other public facilities

Redevelopment By The Numbers

8. Number of the 163 California cities with populations greater than 50,000 that do not have redevelopment agencies, of which Lodi is one.

\$8.7 billion. Redevelopment agencies' revenue in fiscal year 2005-2006, up from \$7.2 billion the previous year.

\$14. Every \$1 of redevelopment agency spending generates nearly \$14 in total economic activity.

\$381 billion. Increase in property values above base-year levels.

\$693 million. Amount spent by state redevelopment agencies in 2005-2006 in low- and moderate-income housing.

20 percent. Amount of property tax revenues generated from redevelopment activities that must be spent to increase the supply of affordable housing.

"... (C)ommunities should revisit the affordable housing possibilities in the urban core. Revitalizing already-used land reduces the need to sprawl onto farms or wetlands and uses compact growth to stop sprawl. Redevelopment in cities uses existing resources rather than forcing taxpayers to subsidize the building of new roads or sewer lines."

— Sierra Club

GRC GRC GRC

This page intentionally left blank

GRC GRC GRC

تعمیر نو: ایک بہتر لوڈی شہر بنانے کا ذریعہ

لوڈی کے شہر کی بہت سی ضروریات ہیں، مثلاً قابل برداشت رہائش (affordable housing) سے لے کر پرانی عمارتوں کی مرمت کرنا، چیروکی لین (Cherokee Lane) میں کاروبار کو بڑھانا۔ لوڈی شہر مسلسل ان خدمات کا معائنہ کرتا ہے جن کا یہ بندوبست کرتا ہے اور اس بات پر غور کرتا ہے کہ کیسے ان کی ادائیگی کریں اور ان میں بہتری لائیں۔ دوسری کیلیفورنیا شہر کی طرح، لوڈی کے پاس ایک ایسا ذریعہ ہے جو ان ضروریات تک پہنچ سکتا ہے جن کا ابھی سامنا نہیں ہوا ہے۔ لیکن ابھی اس کا استعمال نہیں ہوا ہے۔ اور وہ ذریعہ ہے تعمیر نو۔ تعمیر نو شہروں کو اس بات کی اجازت دیتا ہے کہ جب جائداد کے ٹیکس کی قدر بڑھے تو وہ اس کا ایک بڑا حصہ اپنے پاس رکھ سکتے ہیں۔

ریاستی تعمیر نو کے قوانین شہروں کو اس بات کی اجازت دیتے ہیں کہ وہ جائداد کی اونچی قدروں سے حاصل ہونے والے ٹیکس کا استعمال مرمت اور بہتری کے لئے کریں تاکہ ٹیکس دہندہ اور دوسری شہری خدمات سے حاصل ہونے والے ڈرن فنڈس پر زیادہ بوجھ نہ پڑے۔ تعمیر نو کے منصوبہ کے ساتھ، لوڈی اونچی قدروں سے حاصل ہونے والے جائداد کے ٹیکس کا پانچ گنا اپنے پاس رکھے گا اور اس کا استعمال دوسری خدمات کے لئے کریگا جیسے، پولس پروٹیکشن اور پارک کا بندوبست وغیرہ۔ تعمیر نو ٹیکس میں اضافہ نہیں کرتا بلکہ یہ صرف اس طریقہ کو تبدیل کرتا ہے جس میں ٹیکس کی آمدنی تقسیم کی جاتی ہے۔

19 جولائی بروز جمعرات، شام پانچ بجے، لوڈی کی شہری کاؤنسل، بوئز اینڈ گلز کلب، E 275 پوبلر سینٹ میں، ایک خاص میٹنگ کرے گی جس میں اس بات پر غور کیا جائے گا کہ لوڈی میں تعمیر نو کے منصوبہ کو کس طرح عمل میں لایا جائے۔ اس دوران، مندرجہ ذیل جوابات منصوبہ سے متعلق کچھ سوالوں کے جواب دینے میں مدد کر سکتے ہیں۔

سوال: میرے لئے اس میں کیا ہے؟

جواب: اگر نو تعمیری علاقہ میں آپکی کوئی جائداد ہے تو نو تعمیری فنڈ کا استعمال گلیوں، پیدل چلنے والے راستے کے معیار کو بڑھانے، انڈر گراؤنڈ پائپ کی مرمت، اور آپکے گھر، عمارتوں یا آس پاس کی جائداد کو بہتر بنانے میں ہوگا

ریاستی قانون نو تعمیری اجینسیوں کو اس بات کی ہدایت دیتا ہے کہ وہ اپنے فنڈس کا کم سے کم بیس فیصد افرڈ ایبل رہائش پر خرچ کریں۔ قابل قبول پروگراموں کی فہرست اب تک مرتب نہیں ہوئی ہے، اس لئے آپکا اشتراک قیمتی ہے کیونکہ کمیونٹی اس بات پر غور کرتی ہے کہ تعمیر نو کس طرح لوڈی کو فائدہ پہنچا سکتا ہے۔



سوال: نو تعمیری علاقہ کہاں ہے؟

جواب: اگر شہری کا وٹسل کسی نو تعمیری منصوبہ کو عمل میں

تعمیر نو: ایک بہتر لوڈئ شہر بنانے کا ذریعہ

لانے کی کوشش کرتی ہے تو اس کا فیصلہ لوگوں کی مدد سے ہوگا۔ ایک 2002 کی تجویز جس میں مجوزہ منصوبہ کے علاقہ کے اندر مشرقی لوڈئ کی شناخت کی گئی ہے، ایک ابتدائی مرحلہ ہو سکتا ہے۔ سیلس ٹیکس کی وصولیابی، جو معاشی طاقت کا اشارہ ہے، حالیہ برسوں میں جغرافیائی علاقہ کے اندر گھٹ گئی ہے۔

سوال: کیا یہ زیادہ حکومتی (more government) نہیں ہے؟

جواب: یہ ایک الگ اجینسی ہے، لیکن پیسہ کیسے خرچ ہو اس کا فیصلہ لوڈئ شہری کاؤنسل کے ارکان ہی کرتے ہیں جب عوامی میٹنگ (open meeting) لوگوں کو اپنی بات رکھنے کا اختیار دیا جاتا ہے۔

سوال: کیا تعمیر نو اجینسی کسی پرائیوٹ ڈویلپر کی طرف سے میرے مکان کو لے سکتی ہے؟

جواب: لوڈئ میں نہیں۔ شہر کا ایک قانون ہے جو اسے خاص ڈومین پاورز کو استعمال کرنے سے روکتا ہے تاکہ کسی پرائیوٹ پارٹی کے لئے جائداد کو ضبط نہ کیا جائے۔ اگر نوتعمیری منصوبہ کو اختیار کیا جاتا ہے تو اس کا نفاذ اس بندش کے ساتھ ہو گا اور مستقبل میں شہری کاؤنسل لمبے پروسیس اور عوامی رائے کے بغیر کالعدم نہیں ٹھہر سکتی۔

سوال: کیا سال 2002 کے اندر، شہر میں اس کا نفاذ نہیں کیا گیا؟

جواب: عمل تقریباً شروع ہو گیا تھا اور اس وقت بند ہوا جب ایک شہری گروپ نے اس بات پر زور دیا کہ یہ معاملہ ووٹ کے ذریعہ حل ہو۔ لوڈئ شہری کاؤنسل نے فیصلہ کو منسوخ کر دیا۔ لیکن اگر منصوبہ آگے بڑھا ہوتا، تو لوڈئ نوتعمیری اجینسی مقامی منصوبوں کے لئے تقریباً \$500,000 وصول کرتی۔

سوال: میں کتنی جلدی اپنے آس پاس میں تبدیلیوں کو دیکھنے کی کوشش کر سکتا ہوں؟

جواب: یہ کام رات کی رات نہیں ہوگا۔ شہر کو اضافی ڈولر اس وقت ملتے ہیں جب جائداد کی قدر بڑھتی ہے۔ جیسا کہ زیادہ نوتعمیری فنڈس استعمال ہو تو سود مند اثرات بھی زیادہ ہوں۔

زیادہ معلومات کے لئے، شہر کے مینیجر کے دفتر سے دنے ہوئے تمبر پر رابطہ
فائل کریں 333-6700

Re-desarrollo: Una herramienta para construir una mejor Lodi

La ciudad de Lodi tiene muchas necesidades, desde viviendas más costeables hasta la reparación de edificios viejos y el estímulo de negocios en Cherokee Lane. La ciudad constantemente estudia la gama de servicios que proporciona y la forma de pagarlos y mejorarlos. Al igual que cualquier otra ciudad de California, Lodi cuenta con una herramienta para cubrir algunas de esas necesidades, pero que a diferencia de la mayoría de las ciudades, en este momento no se usa. Dicha herramienta es el re-desarrollo, que permite a las ciudades conservar una mayor participación de los impuestos de propiedades cuando aumenta el valor.

La ley estatal de re-desarrollo permite a la ciudad usar los impuestos generados de valores de propiedades más altos para pagar reparaciones y mejoras que de otro modo requerirían cuotas más altas de los contribuyentes o fondos para desagüe de otros servicios de la ciudad. Con el plan de re-desarrollo, Lodi conservaría cinco veces más del impuesto de propiedades generado por valores más altos que sin ellos, liberando más capital para servicios como la protección policíaca y el mantenimiento a parques. Con el re-desarrollo no aumentan los impuestos, simplemente cambia la proporción en que se distribuyen los ingresos tributarios.

Cuatro de las seis ciudades del condado tienen oficinas activas de re-desarrollo que van desde la más grande en Stockton hasta una de las más pequeñas en Ripon (14,575 habitantes).

El Jueves 19 de Julio a las 6 p.m., el Ayuntamiento de Lodi llevará a cabo una junta especial en el Boys & Girls Club, 275 E. Poplar St., para estudiar la posibilidad de crear un proyecto en Lodi. Mientras tanto, las siguientes respuestas pueden ayudarle si tiene dudas respecto al proceso:

Pregunta: ¿Qué gano con el re-desarrollo?

Respuesta: Si tiene una propiedad en un área de re-desarrollo, los fondos para el re-desarrollo irán a la modernización de calles y banquetas, reparaciones de tuberías subterráneas y programas de asistencia para mejorar su casa, edificio o propiedades circundantes. La ley estatal requiere que las oficinas de re-desarrollo gaste por lo menos 20 por ciento de los fondos en vivienda costeable. Todavía no se establece la lista de programas a elegir, por lo que su participación es valiosa ya que la comunidad toma en consideración la forma en que el re-desarrollo puede beneficiar a Lodi.



Re-desarrollo: Una herramienta para construir una mejor Lodi (cont.)

Pregunta: ¿Cuál es la zona de re-desarrollo?

Respuesta: Si el Ayuntamiento de la ciudad decide buscar un proyecto de re-desarrollo, será algo que se decida con la ayuda del público. Una propuesta de 2002, en la que se identificó la mayor parte del este de Lodi en la zona del proyecto propuesto, podría ser un punto de partida de la discusión. De hecho, la recaudación fiscal sobre ventas, indicador de fuerza económica, ha disminuido en años recientes en esa zona geográfica.

Pregunta: ¿No es algo más del gobierno?

Respuesta: Es una oficina independiente, aunque son los miembros del Ayuntamiento de la ciudad de Lodi que toman las decisiones, por ejemplo, en como se gasta el dinero, someten su opinión ante el público durante una junta abierta.

Pregunta: ¿La oficina de re-desarrollo podría quedarse con mi casa a nombre de un desarrollador particular?

Respuesta: En Lodi, no. La ciudad tiene un decreto de ley que le prohíbe usar poderes de dominio eminentes para incautar una propiedad para beneficio de un particular. Si se adopta un proyecto de re-desarrollo, se establecerá aplicando esa prohibición, que un futuro Ayuntamiento no podrá revertir sin un proceso largo ni participación del público.

Pregunta: ¿La ciudad no estaba preparada para el proyecto en 2002?

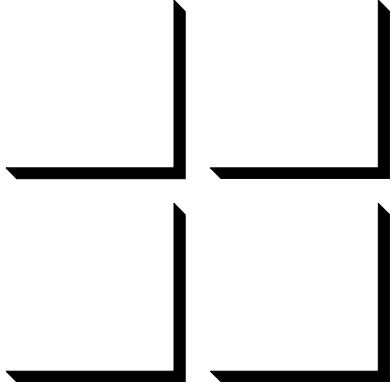
Respuesta: Casi. Se dio inicio al proceso y luego se detuvo porque un grupo ciudadano obligó que se sometiera a votación. El Ayuntamiento de la ciudad de Lodi decidió que no era el momento adecuado y dejaron el tema. Pero, de haber continuado con el proyecto, la oficina de re-desarrollo de Lodi (*Lodi Redevelopment Agency*) recibiría aproximadamente \$500,000 al año por proyectos locales.

Pregunta: ¿Qué tan pronto puedo esperar ver cambios en mi vecindario?

Respuesta: No será de la noche a la mañana. La ciudad recibe más dólares sólo cuando aumentan el valor de la propiedad. Pero con el tiempo, conforme se invierten más fondos, se compensará el efecto del beneficio.

Para más información, comuníquese a la oficina del administrador de la ciudad al 333-6700.





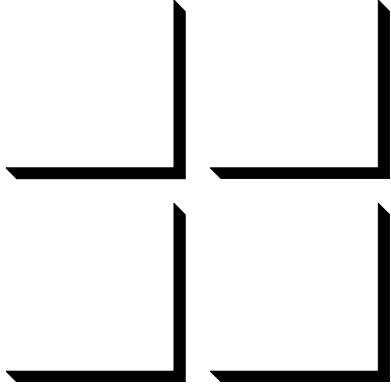
18.0 REPORT REQUIRED BY SECTION 65402 OF THE GOVERNMENT CODE

The report of the Planning Commission required by Section 65402 of the Government Code is included in Chapter 18.0 of this Report. The Planning Commission found that the proposed project is in conformance with the City's General Plan.

GRC GRC GRC

This page intentionally left blank

GRC GRC GRC



19.0 REPORT REQUIRED BY SECTION 21151 OF THE PUBLIC RESOURCES CODE (THE PROGRAM ENVIRONMENTAL IMPACT REPORT)

In accordance with the CRL, the California Environmental Quality Act (CEQA), and local CEQA guidelines, an environmental review of the potential impacts of the proposed Redevelopment Plan was prepared in the form of an initial study. As a result of this review, a Draft Program Environmental Impact Report (DEIR) was prepared and circulated to the State Clearinghouse, responsible agencies, taxing agencies, and other interested parties for review and comment. The mailing labels for those receiving the environmental documents are on the pages immediately following this chapter.

Comments received on the original DEIR and the Revised DEIR, and the responses to those comments, are included in the Final EIR. The Final EIR, the Revised DEIR and Initial Study for the Project are included (see Appendix D), and by this reference are made a part hereof.

Responsible Agency List

Woodbridge Fire
400 E. Augusta St
Woodbridge, CA 95258

Catherine Kuhlman
CEO Northcoast
CA Regional Water Quality Control Board
5550 Skylane Blvd, Suite A
Santa Rosa, CA 95403

City of Lodi Police Department
230 W. Elm Street
Lodi, CA 95240

City of Stockton Community
Development Department
345 N. El Dorado Street
Stockton, CA 95202

Rich Laiblin
San Joaquin County
Administration Office
222 E. Weber Street
Stockton, CA 95205

State Clearinghouse
Office of Planning & Research
1400 10th Street
Sacramento, 95814

California Department of Health
Services
31 E. Channel St. #400
Stockton, CA 95202

San Joaquin Council of
Governments
555 E. Weber Avenue
Stockton, CA 95202

Native American Heritage
Commission
915 Capital Mall, Room 364
Sacramento, CA 95814

Jon Stroh
San Joaquin Mosquito & Vector
Abatement District
7759 S. Airport Way
Stockton, CA 95206-3918

City of Lodi Fire Department
25 East Pine Street
Lodi, CA 95240

San Joaquin County Community
Development Department
1810 E. Hazleton Avenue
Stockton, CA 95205

Hector R Guerra
Senior Air Quality Planner
San Joaquin Valley APCD
1990 E. Gettysburg Avenue
Fresno, CA 93726

California Department of Fish &
Game
701 Nimbus Road
Rancho Cordova, CA 95670

California Department of
Transportation
District 10
1976 E. Charter Way
Stockton, CA 95205

Lodi News Sentinel
125 N. Church St.
Lodi, CA 95240

California Water Resources
Control Board
901 P Street
Sacramento, CA 95814

Art Hand
Lodi Unified School District
1305 E. Vine Street
Lodi, CA 95240

Lodi Library
201 West Locust St.
Lodi, CA 95240

San Joaquin County LAFCO
1860 E. Hazleton Avenue
Stockton, CA 95205

Land Agents
Pacific Gas & Electric
P.O. Box 930
Stockton, CA 95201

California Highway Patrol
3330 N. Ad Art Road
Stockton, CA 95215

Stockton Record
101 W. Locust St. #4
Lodi, CA 95240

Steve Schwabauer
City of Lodi
P.O. Box 3006
Lodi, CA 95241-1910

Randi Johl
City of Lodi
P.O. Box 3006
Lodi, CA 95241-1910

Peter Pirnejad
City of Lodi
P.O. Box 3006
Lodi, CA 95241-1910

Richard Prima
City of Lodi
P.O. Box 3006
Lodi, CA 95241-1910

Wally Sandelin
City of Lodi
P.O. Box 3006
Lodi, CA 95241-1910

Steve Dutra
City of Lodi
P.O. Box 3006
Lodi, CA 95241-1910

Ruby Paiste
City of Lodi
P.O. Box 3006
Lodi, CA 95241-1910

Taxing Agency List

Governing Board C/O
Mr. Manuel Lopez
Chief Administrative Officer
San Joaquin County
222 East Weber Ave. #707
Stockton, CA 95202

Governing Board C/O
Mr. Bill Huyett
Superintendent
Lodi Unified School District
1305 E. Vine Street
Lodi, CA 95240

Governing Board C/O
Dr. Raul Rodriguez
Superintendent/President
San Joaquin Delta College
5151 Pacific Avenue
Stockton, CA 95207

Governing Board C/O
Mr. Blair King
City Manager
City of Lodi
221 West Pine Street
P.O. Box 3006
Lodi, CA 95241

Governing Board C/O
Mr. Thomas R. Flinn
Public Works Director/Flood Control
Engineer
San Joaquin County Flood Control
1810 East Hazelton Avenue
Stockton, CA 95205

Governing Board C/O
Mr. Fredrick A. Wentworth
Superintendent of Schools
San Joaquin County Office of
Education
2901 Arch-Airport Road
PO Box 213030
Stockton, CA 95213

Governing Board C/O
Mr. John R. Stroh
Manager
San Joaquin County Mosquito
& Vector Control District
7759 South Airport Way
Stockton, CA 95206-3918

Governing Board C/O
Mr. Ed Steffani
Manager
North San Joaquin Water Conserv.
District
P.O. Box 428
Clements, CA 95227

Mr. Ralph Davis
Supervisor
State Board of Equalization
450 'N' Street, MIC: 59
Sacramento, CA 94279

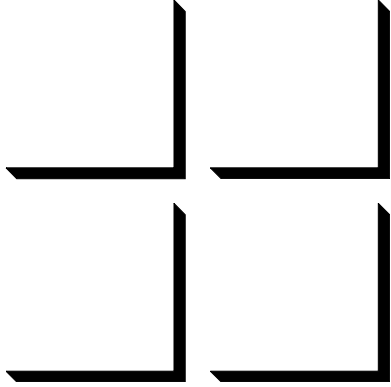
Governing Board C/O
Fred Weybret
President
North San Joaquin Water Conserv.
Dist.
1520 Edgewood Drive
Lodi, CA 95241

Governing Board C/O
Mr. Ed Steffani
Manager
North San Joaquin Water Conserv.
District
221 West Pine Street
Lodi, CA 95241

GRC GRC GRC

This page intentionally left blank

GRC GRC GRC



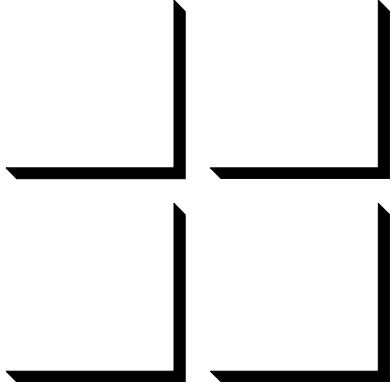
20.0 REPORT OF THE COUNTY FISCAL OFFICER AND SECTION 33328.5 SUPPLEMENTAL REPORT

The County Fiscal Officer was notified on January 11, 2008, that the base year of the rolls last equalized on August 20, 2007, would be used for the calculation of tax increment for the Project Area. A report pursuant to Section 33328 of the CRL was then prepared by the County Fiscal Officer and received by the Agency. This report is included on the following pages.

GRC GRC GRC

This page intentionally left blank

GRC GRC GRC



21.0 NEIGHBORHOOD IMPACT REPORT

21.1 RELOCATION

In any redevelopment project, an important potential impact on area occupants is the displacement and dislocation of residents during Project implementation activities. However, the Redevelopment Plan for the Project Area does not allow the Agency to purchase any property through eminent domain.

The potential to displace residents through Agency activities would be only be as a result of those residents willing to be involved in such an action in order to accomplish Redevelopment Plan goals and objectives. The Agency's focus on residential uses in the Project Area will be to provide housing rehabilitation assistance and other forms of assistance, and to facilitate infill residential and residential mixed-use development where permissible under the General Plan and Zoning Ordinance.

While housing rehabilitation will be emphasized by the Agency, it is recognized that there may be a small number of dwelling units in the Project Area that are deteriorated to the point where rehabilitation may not be feasible. The exact number is difficult to estimate as only building exteriors have been examined from the public right-of-way. In such cases where deterioration is to the point where removal is necessary, the Agency may seek to purchase the deteriorated building without the use of eminent domain and provide for the construction of a new replacement unit that is decent, safe, and sanitary.

Based on exterior condition only, significant rehabilitation assistance is needed for approximately 100 to 200 dwelling units in the Project Area, and is expected to be available

throughout the life of the Redevelopment Plan. During the first five years of the Redevelopment Plan, the Agency will likely have only limited resources to undertake rehabilitation assistance. However, through year 30, the Redevelopment Plan should generate sufficient resources in the low- and moderate-income housing fund to assist most, if not all, of the units needing improvement.

Housing rehabilitation will have multiple benefits for the community. Not only will many lower-income homeowners be able to receive financial assistance in the repair of their homes, but through rehabilitation, as opposed to new home construction, a low-density character of the Project Area can be preserved.

In addition to potentially replacing severely deteriorated housing, it should be noted that the Project Area has about 280 residential units in areas designated for non-residential type of uses. Over the long term, these non-conforming units may remain or be removed by market forces, or on a highly selective basis be purchased by the Agency through voluntary acquisition. Where possible and financially feasible, removed non-conforming units may be moved to suitable sites in the Project Area or elsewhere in the city. Where this option is not feasible and provided the units are not historically significant, the subject units may be demolished and then replaced with affordable housing units as required by law at other locations in the community.

By emphasizing housing rehabilitation, the Agency expects to achieve the following goals for the community and neighborhood:

- To the extent feasible, improve existing units to avoid dislocation and the need for permanent relocation and replacement.
- Reduce the number of vacant dwelling units in the community and, in so doing, strengthen the local housing market.
- Where required by conditions of severe dilapidation, work with property owners to remove, replace, or upgrade dwellings that are unsafe and detrimental to property values in the neighborhoods in which they are located.
- In cases where residential units do not conform to the land uses indicated in the General Plan, and the land is needed for development of uses that are consistent with land use policies and Redevelopment Plan goals but

cannot be reasonably achieved by the private market acting alone, the Agency may cause such units to be moved to other locations or to be demolished and replaced by suitable replacement units on sites designated for residential use, through voluntary participation of the property owner(s).

- Maintain or reduce the existing density character of the Project Area by, to the greatest extent feasible, increasing the quality, value, life, and utility of the existing housing stock.

Due to conditions in and around the Project Area, the Agency will strive to spend its low- and moderate-income housing funds inside the boundaries of the Project Area.

21.2 ENVIRONMENTAL QUALITY

The impact of the Project on the environment is discussed in depth in the Final Environmental Impact Report, attached as Appendix D. The adoption of the Redevelopment Plan is expected to have, overall, a positive impact on the environment by eliminating those conditions associated with blight as described in the CRL, and as documented elsewhere in this report.

A key improvement to the neighborhoods in the Project Area may be Agency-induced rehabilitation of existing neighborhood shopping facilities and the construction and/or improvement of community facilities.

Also of benefit to the neighborhoods will be the construction of new commercial uses in commercial zones that will provide added employment opportunities. High unemployment and the conditions that give rise to high unemployment, such as lower levels of educational achievement, could constitute a long-term disadvantage to the Project Area and the immediately surrounding areas. By increasing commercial and other employment opportunities in the area, the Agency will make available to local residents the means to self-improvement and economic success.

It is expected that redevelopment activities will assist the City in issues of sustainability and environmental quality. Lodi is 1 of 238 cities from 39 states and six countries that are participating in the US Green Building Council's pilot

program for leadership in Energy and Environmental Design for Neighborhood Development, (LEED-ND). Redevelopment will help meet new storm water discharge standards for older buildings and neighborhoods. Installing water meters will help water conservation and reduce water consumption.

21.3 INFRASTRUCTURE

A major component of the proposed Project is the provision of drainage, roadway and circulation, water, and other infrastructure improvements in the proposed Project Area. Such improvements are expected to improve circulation and traffic flow, mitigate the impacts of overland flooding, improve the amount and quality of local water service, upgrade the appearance of a major gateway to downtown, and stimulate private investment in the area.

21.4 COMMUNITY FACILITIES AND SERVICES

The Agency is authorized to install and construct, or cause to be installed and constructed, a wide range of public improvements and facilities. These improvements and facilities are listed in the draft Redevelopment Plan and throughout this Report. These public improvements will directly benefit the Project Area and its immediately surrounding neighborhoods by directly enhancing public health and safety, and by increasing the levels of local services.

While community facilities will be improved as a result of Agency activities, public services should also be improved by the increased property tax base created in part by redevelopment activities. Over the long term, these benefits will accrue to the City and local taxing agencies.

21.5 SCHOOL POPULATION AND EDUCATION QUALITY

The proposed Project Area is not projected to result in a significant net increase in new students. As such, student generation from within the Project Area will remain roughly the same as it is at present.

21.6 PROPERTY ASSESSMENTS AND TAXES

The total assessed value of the Project Area is expected to increase due to the rehabilitation of existing residential uses, and through development of new employment-generating land uses in the Project Area. Under state law and provisions of the Redevelopment Plan, revenues from taxes levied on the increase on such property assessments after the adoption of the Redevelopment Plan are allocated to the Agency to repay indebtedness incurred by the Agency in carrying out the Redevelopment Plan.

Revitalization in the Project Area may also have a positive effect on the market value of properties in adjacent neighborhoods, resulting in some increase in assessed valuation in these areas. Property tax rates, which are governed by Article XIII A of the State Constitution, will not be affected by redevelopment activities.

21.7 HOUSING

The expected benefits of the Agency's funding of housing rehabilitation and development in the Project Area are described above. The following specific information required by the CRL also reflects these benefits:

1. The number of dwelling units housing persons and families of low- or moderate-income expected to be removed from the low- and moderate-income housing market for the duration of the Redevelopment Plan by the Agency is zero. However, as described in Chapter 21.1, there are a small number of severely dilapidated dwellings that may be beyond rehabilitation. It is possible that these units may be removed on a voluntary basis. If these units are occupied by low- and moderate income persons, they will be replaced by an equal or greater number of units available in the low- and moderate-income housing market. The Agency will maintain a fund dedicated to the expansion and enhancement of affordable housing in accordance with Redevelopment Law.
2. The number of persons of low- and moderate-income that could be displaced over the life of the Redevelopment Plan by the Agency is zero. However, if it is assumed that any dilapidated dwelling units are removed either voluntarily or in the open market, then approximately 50 persons could be displaced. Some or

all of these individuals could be eligible for relocation assistance.

3. Most of the dwelling units in need of rehabilitation are spread throughout the Project Area. The Agency will give primary consideration to rehabilitation plans which will serve to improve and preserve the community's supply of low- and moderate-income housing in the Project Area and, possibly, at other nearby locations. The Agency and City also will consider proposals for new infill residential development, so long as such proposals do not conflict with the goals of the General Plan.
4. The draft Redevelopment Plan is in conformance with the City's General Plan, which projects up to 2 newly constructed 200 residential units in the Project Area. In accordance with the CRL, at least 15% (or up to 121) of these new units will be made affordable to low- and moderate-income persons or families over the life of the Redevelopment Plan. The Agency expects to have substantial funds over the life of the Plan that may be used for replacement units or for rehabilitation of existing units. The Agency will have the authority to finance rehabilitation activities inside and outside the Project Area.
5. Depending on the availability of various programs, various low- and moderate-income housing programs will be undertaken using the Agency's 20% housing set-aside, combined with other available housing resources, or through the use of bond financing primarily for residential projects and programs.
6. There are no plans to relocate or otherwise displace Project Area occupants, thus there is no time table for providing replacement units. However, if dwelling units housing persons and families of low- or moderate-income are destroyed or removed from the low- or moderate-income housing market through a voluntary action in furtherance of the Redevelopment Plan, the Agency will, within four (4) years of such destruction or removal, rehabilitate, develop or construct, or cause to be rehabilitated, developed or constructed for rental or sale to persons and families of low- and moderate-income, an equal number of replacement dwelling units at an affordable rent within the Project Area or elsewhere nearby, in accordance with provisions of Section 33413 and 33413.5 of the CRL.

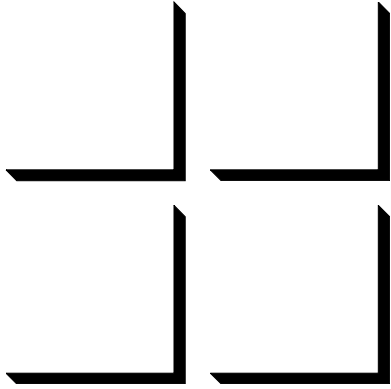
21.8 OTHER MATTERS AFFECTING THE PHYSICAL AND SOCIAL QUALITY OF THE NEIGHBORHOOD

The successful redevelopment of the Project Area by the Agency will result generally in the physical upgrading of public improvements, an improvement in the aesthetic environment of the Project Area, an increase in job opportunities through construction and through commercial employment, an improvement in public facilities, long-term increases in the City's economic health, and a more efficient utilization of land in the Project Area.

GRC GRC GRC

This page intentionally left blank

GRC GRC GRC



22.0 33328 REPORT ANALYSIS AND SUMMARY OF CONSULTATIONS WITH TAXING AGENCIES

The following is an analysis of the 33328 report received by the Agency on February 14, 2008.

22.1 ANALYSIS OF 33328 REPORT

A copy of the 33328 Report and the mailing labels of each notified taxing agency are on the pages following this chapter.

The 33328 Report indicated that the total base year value as of the 2007-08 fiscal year was \$1,340,913,995 (which included \$8,604,400 in homeowners exemptions). Since the 33328 Report was prepared, the Planning Commission has taken action to remove certain parcels from the proposed Project Area. The total secured value of the parcels that were removed equaled \$96,494,645. The new base year value after reduction for the deleted parcels is \$1,244,419,350. This is the base year value that was used for preparation of the financial projections shown in Part 10.

22.2 SUMMARY OF CONSULTATIONS WITH TAXING AGENCIES

All affected taxing agencies were invited to meet with Agency representatives. A meeting was held on March 24, 2008, with Raul Rodriguez of Delta Community College. City Manager Blair King went over the reasons the City was proposing to adopt a Redevelopment Plan for the proposed Project Area and why the area met the CRL definitions as a blighted and urbanized area. Don Fraser, the Agency's Financial Consultant, went over the financial implications of the adoption of the Plan. Based on the financial projections that were prepared, the College District could expect to receive almost \$9.0 million for facilities from the statutory pass through payment over the life of the Plan. This would equal approximately \$2.0 million in inflation adjusted dollars. Mr. Rodriguez was also asked to approve a waiver of the 90 day Preliminary Report review period. This was requested in order accommodate the schedule of the City Council so that all members could be present at the joint public hearing on the Plan, which needs to take place on May 28, 2008.

On March 26, 2008, Blair King and Don Fraser met with Ed Steffani of the North San Joaquin Water Conservation District. Also in attendance was Richard Prima, the City's Public Works Director. Mr. King went over the reasons for adopting the Project Area and the assumptions for the tax increment projections. Mr. Fraser went over the impacts of tax increment financing on the District. A series of questions and answers took place. Mr. King also asked for a waiver of the 90 day Preliminary Report review period. Mr. Stefani said he would request this action from his Board. He also stated that the Board was in support of the City's actions on redevelopment.

On the afternoon of March 26, 2008, Mr King and Mr. Fraser met with representatives of the school districts. This included:

- Mamie Starr, Director of Facilities for the County Office of Education (COE);
- Mr. Len Casanega, the Superintendent of the Lodi Unified School District (LUSD); and
- Mr. Art Hand, the Assistant Superintendent of the LUSD

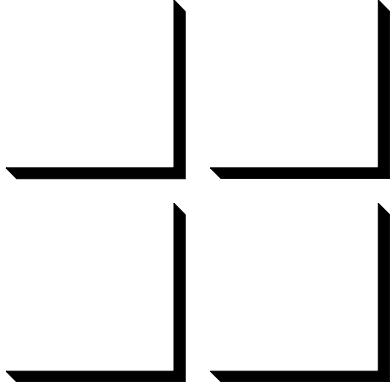
Mr. King started with an overview of the purposes of adopting the Redevelopment Plan and what the City hopes to achieve. He also discussed briefly the types of information that is in the Preliminary Report and how the area qualifies as blighted and urbanized. Mr. Fraser then went over the financial impacts for the two Districts. Based on the financial projections that were prepared, the COE could expect to receive almost \$5.0 million for facilities and the LUSD over \$50 million from the statutory pass through payments over the life of the Plan. This would equal approximately \$1.0 million for the COE and \$12 million for the LUSD in inflation adjusted dollars. There was also a discussion that the Districts may wish to participate in future Agency bond issues, and that the Agency bond limit should be set to accommodate this. Mr. King then went over the 90 day Preliminary Report waiver, and the Districts indicated that they would request this from their governing boards. After the meeting, Mr. Hand of LUSD provided Mr. Fraser with additional information that showed the impact that future commercial and industrial development could have on the facilities needs of the LUSD.

Immediately following the school district meeting, Mr. King and Mr. Fraser met with John Stroh of the San Joaquin Mosquito Abatement District. Richard Prima was also in attendance. A discussion occurred on the reasons for adopting the Plan and the financial impacts on the District. Mr. King also discussed the need for the 90 day waiver on the Preliminary Report review period. Mr. Stroh stated he would review this with his legal counsel. Mr. Stroh asked some questions on the boundaries of the Project Area. He wanted to know why the area north of Turner Road and east of Highway 99 was in, since it was a flood plain. Mr. King explained that it was going to be deleted from the Project Area. Mr. Stroh also asked that the City change the design of its catch basins so that they don't hold water, which provides a location for mosquitoes to breed. Mr. Prima thought that the City could accommodate the requested change. Mr. Stroh also asked if any other taxing entity was receiving an adjusted pass through amount pursuant to an agreement. Mr. King stated that the Agency could not do this under the CRL.

Mr. King and Mr. Fraser then met with representatives of the County of San Joaquin on March 26 in the late afternoon. In attendance for the County were:

- Manuel Lopez, the County Administrator;
- Rich Laiblin, Senior Deputy County Administrator;
- Phonxay Keokhan, Management Analyst

Mr. King went over the reasons for the adopting the Project Area and the assumptions for the tax increment projections. He also explained some of the boundary adjustments the staff was proposing and the need for the 90 day waiver. Mr. Fraser presented tables that showed total and annualized tax increment impacts on each district and followed up with responses to questions presented at the meeting. Mr. Lopez thought it would be helpful if the Board of Supervisors were to receive documentation showing that the City Council did not intend to include the power of eminent domain in the Redevelopment Plan.



23.0 RELOCATION METHOD

Section 33352(f) of the Community Redevelopment Law requires this Report to contain a “method or plan” for “the relocation of families and persons to be temporarily or permanently displaced from housing facilities in the project area, which...shall include the provision required by Section 33411.1...”

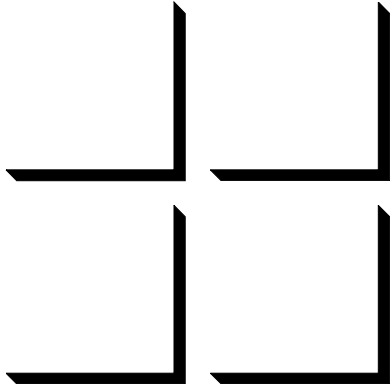
On April 16, 2008, the Redevelopment Agency adopted a Relocation Method for the proposed Project Area. A copy of the Relocation Method may be found in Appendix E.

Adoption of a Relocation Method is required even where displacement is not contemplated or expected.

GRC GRC GRC

This page intentionally left blank

GRC GRC GRC



APPENDIX A

GRC REDEVELOPMENT CONSULTANTS STAFF

ERNEST GLOVER

President

As President of GRC Redevelopment Consultants, Inc. since 1993, Mr. Glover has managed over 100 Redevelopment Plans and land use programs. He was the Principal in Charge, and provided the economic, demographic and fiscal information.

DON FRASER

President, Fraser & Associates

Mr. Fraser prepared the financial analysis that is included in the Report. Fraser & Associates specializes in financial analysis for redevelopment agencies, and has worked on various financings throughout California for the past 14 years. Mr. Fraser has assisted in the amendment or adoption of over 30 redevelopment plans. His numeric analyses are regularly accepted by the major rating agencies and bond insurers.

JOANN LOMBARDO

Environmental Specialist

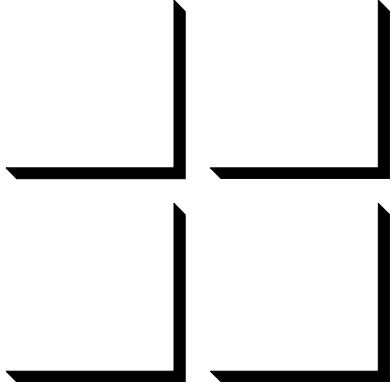
Ms. Lombardo prepared the environmental documents related to this Amendment. She has been working with GRC since 1993.

Detailed resumes of the consulting team are available at the offices of the Agency.

GRC GRC GRC

This page intentionally left blank

GRC GRC GRC



APPENDIX B

Project Area Parcel List

GRC] GRC] GRC]

This page intentionally left blank

GRC] GRC] GRC]

The following is a list of Assessor’s Parcel Numbers (APNs) from the Project Area. Each parcel has been examined for the existence of blight according to the California Redevelopment Law (CRL). The following table lists the existence of blight conditions from specific sections of the CRL for each parcel in the Project Area.

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
031-070-22		Y			Y	Y		Y
031-070-23		Y			Y	Y		Y
031-070-24		Y			Y	Y		Y
031-070-25		Y			Y	Y		Y
031-070-26		Y			Y	Y		Y
031-070-27	Y	Y			Y	Y		Y
031-070-28	Y	Y			Y	Y		Y
031-070-29	Y	Y			Y	Y		Y
031-070-31					Y	Y		Y
031-070-32					Y	Y		Y
031-185-04			Y		Y	Y	Y	Y
031-185-05	Y		Y		Y	Y		Y
031-185-06	Y	Y	Y		Y	Y		Y
031-185-07	Y	Y	Y		Y	Y		Y
031-185-10			Y		Y	Y		Y
031-185-11	Y	Y	Y		Y	Y		Y
031-185-12	Y		Y		Y	Y		Y
031-185-13	Y	Y	Y		Y	Y		Y
031-185-24					Y	Y		Y
031-185-25	Y		Y		Y	Y		Y
031-185-26			Y		Y	Y		Y
031-190-25		Y		Y	Y	Y		Y
031-190-26					Y	Y		Y
031-190-27					Y	Y		Y
033-080-36					Y	Y		Y
033-080-38	Y	Y			Y	Y		Y
033-080-48					Y	Y		Y
033-080-55	Y	Y			Y	Y		Y
033-080-56		Y			Y	Y		Y
033-080-57		Y			Y	Y		Y
033-080-58					Y	Y		Y
033-080-59	Y				Y	Y		Y
033-090-29	Y	Y			Y	Y		Y
033-090-30	Y	Y			Y	Y		Y
033-100-09		Y	Y		Y	Y		Y
033-100-10		Y	Y		Y	Y		Y
033-100-14		Y			Y	Y	Y	Y
033-100-15		Y			Y	Y	Y	Y
033-110-21	Y				Y	Y		Y
033-110-22	Y				Y	Y		Y
033-110-23	Y	Y			Y	Y		Y
033-110-26	Y	Y			Y	Y		Y
033-110-29		Y			Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
033-110-30		Y			Y	Y		Y
033-110-33					Y	Y		Y
033-110-34					Y	Y		Y
033-190-16					Y	Y		Y
033-190-20					Y	Y		Y
033-190-25					Y	Y		Y
033-190-26		Y		Y	Y	Y		Y
033-190-30					Y	Y		Y
033-190-32					Y	Y		Y
033-190-34					Y	Y		Y
033-190-36					Y	Y		Y
033-190-37					Y	Y		Y
033-190-38					Y	Y		Y
033-190-39				Y	Y	Y		Y
037-100-06		Y			Y	Y		Y
037-100-09		Y			Y	Y		Y
037-100-39		Y		Y	Y	Y		Y
037-100-40		Y			Y	Y		Y
037-120-14		Y			Y	Y		Y
037-120-36		Y			Y	Y	Y	Y
037-120-37		Y			Y	Y	Y	Y
037-120-55		Y			Y	Y	Y	Y
037-210-01	Y				Y	Y		Y
037-210-02	Y				Y	Y		Y
037-210-03	Y				Y	Y		Y
037-210-04	Y				Y	Y		Y
037-210-05	Y				Y	Y		Y
037-230-09		Y	Y		Y	Y		Y
037-230-11	Y	Y	Y		Y	Y	Y	Y
037-230-27		Y	Y		Y	Y		Y
037-240-01	Y		Y		Y	Y		Y
037-240-02	Y		Y		Y	Y		Y
037-240-03	Y		Y		Y	Y		Y
037-240-04	Y				Y	Y		Y
037-240-05	Y				Y	Y		Y
037-240-06	Y				Y	Y		Y
037-250-01		Y			Y	Y		Y
037-250-02		Y		Y	Y	Y		Y
037-250-03		Y			Y	Y	Y	Y
037-250-04		Y		Y	Y	Y	Y	Y
037-250-05		Y			Y	Y		Y
037-250-06		Y			Y	Y	Y	Y
037-260-01					Y	Y		Y
037-260-02					Y	Y		Y
037-260-03					Y	Y		Y
037-260-07		Y		Y	Y	Y		Y
037-260-08			Y		Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
037-260-09	Y	Y			Y	Y		Y
037-260-10	Y		Y		Y	Y		Y
037-260-13		Y			Y	Y		Y
037-260-14			Y		Y	Y		Y
037-260-15	Y	Y			Y	Y		Y
037-260-16	Y		Y		Y	Y		Y
037-260-17	Y				Y	Y		Y
037-260-18	Y	Y	Y		Y	Y		Y
037-260-19	Y				Y	Y		Y
037-260-20		Y	Y		Y	Y		Y
037-260-21					Y	Y		Y
037-260-22	Y				Y	Y		Y
037-260-23					Y	Y		Y
037-260-24	Y		Y	Y	Y	Y		Y
037-260-25			Y		Y	Y		Y
037-260-26					Y	Y		Y
037-260-27		Y			Y	Y		Y
037-260-29	Y		Y		Y	Y		Y
037-260-34					Y	Y		Y
037-260-35		Y	Y		Y	Y		Y
037-260-36		Y	Y		Y	Y		Y
037-260-38		Y			Y	Y		Y
037-260-39		Y			Y	Y		Y
037-260-40	Y	Y	Y	Y	Y	Y		Y
037-260-41		Y			Y	Y		Y
037-260-42		Y			Y	Y		Y
037-260-43	Y				Y	Y		Y
037-260-44					Y	Y		Y
037-260-45					Y	Y		Y
037-260-46					Y	Y		Y
037-300-20		Y			Y	Y		Y
037-300-49		Y	Y	Y	Y	Y		Y
037-300-50					Y	Y		Y
037-300-57		Y	Y		Y	Y		Y
037-300-58			Y		Y	Y		Y
037-300-59					Y	Y		Y
039-010-05					Y	Y		Y
041-100-05	Y	Y			Y	Y		Y
041-100-06	Y				Y	Y		Y
041-100-07	Y				Y	Y		Y
041-100-08	Y				Y	Y		Y
041-100-09	Y	Y			Y	Y		Y
041-100-10	Y	Y			Y	Y		Y
041-100-11	Y	Y			Y	Y		Y
041-100-12	Y				Y	Y		Y
041-100-13	Y				Y	Y		Y
041-100-15	Y	Y			Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
041-100-16	Y				Y	Y		Y
041-100-17					Y	Y		Y
041-100-18	Y	Y			Y	Y		Y
041-140-02	Y	Y			Y	Y		Y
041-140-03	Y				Y	Y		Y
041-140-04	Y				Y	Y		Y
041-140-07	Y			Y	Y	Y		Y
041-140-09	Y			Y	Y	Y		Y
041-140-10	Y			Y	Y	Y		Y
041-140-11				Y	Y	Y		Y
041-140-12	Y			Y	Y	Y		Y
041-140-13	Y	Y		Y	Y	Y		Y
041-140-15	Y				Y	Y		Y
041-140-30	Y			Y	Y	Y		Y
041-140-31	Y			Y	Y	Y		Y
041-140-32		Y			Y	Y		Y
041-140-33					Y	Y		Y
041-140-37	Y			Y	Y	Y		Y
041-140-38	Y				Y	Y		Y
041-140-39	Y	Y			Y	Y		Y
041-140-40					Y	Y		Y
041-140-41	Y				Y	Y		Y
041-150-09	Y	Y			Y	Y		Y
041-150-10	Y	Y			Y	Y	Y	Y
041-150-11	Y	Y			Y	Y		Y
041-150-12	Y				Y	Y		Y
041-150-13	Y				Y	Y		Y
041-150-15	Y	Y			Y	Y		Y
041-150-16	Y	Y			Y	Y		Y
041-161-01	Y			Y	Y	Y		Y
041-161-02	Y	Y			Y	Y		Y
041-161-03		Y			Y	Y		Y
041-161-04	Y	Y			Y	Y		Y
041-161-05	Y				Y	Y		Y
041-161-06	Y	Y			Y	Y		Y
041-161-07	Y	Y			Y	Y		Y
041-161-08	Y				Y	Y		Y
041-161-09		Y			Y	Y		Y
041-161-10		Y			Y	Y		Y
041-161-11	Y	Y			Y	Y		Y
041-161-12	Y				Y	Y		Y
041-161-13		Y		Y	Y	Y		Y
041-161-14		Y	Y	Y	Y	Y		Y
041-161-15		Y	Y		Y	Y		Y
041-161-17				Y	Y	Y		Y
041-161-18	Y			Y	Y	Y		Y
041-161-19	Y			Y	Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
041-161-22	Y				Y	Y		Y
041-161-23		Y	Y		Y	Y		Y
041-161-24		Y	Y		Y	Y		Y
041-161-25		Y	Y		Y	Y		Y
041-161-26		Y	Y		Y	Y		Y
041-161-27		Y			Y	Y		Y
041-161-28	Y	Y			Y	Y		Y
041-161-29	Y	Y			Y	Y		Y
041-161-30					Y	Y		Y
041-162-01	Y	Y			Y	Y		Y
041-162-02	Y				Y	Y		Y
041-162-03	Y				Y	Y		Y
041-162-04	Y				Y	Y		Y
041-162-05	Y	Y			Y	Y		Y
041-162-08	Y	Y		Y	Y	Y		Y
041-162-09	Y				Y	Y		Y
041-162-10	Y			Y	Y	Y		Y
041-162-11		Y			Y	Y		Y
041-162-12	Y			Y	Y	Y		Y
041-162-14	Y			Y	Y	Y		Y
041-162-15	Y	Y			Y	Y		Y
041-162-16	Y	Y		Y	Y	Y		Y
041-162-17	Y	Y			Y	Y		Y
041-163-01		Y			Y	Y		Y
041-163-03	Y	Y			Y	Y		Y
041-163-04	Y	Y			Y	Y		Y
041-163-05	Y			Y	Y	Y		Y
041-163-06	Y		Y		Y	Y		Y
041-163-07			Y		Y	Y		Y
041-163-08	Y		Y		Y	Y		Y
041-163-09	Y		Y		Y	Y		Y
041-163-10	Y		Y		Y	Y		Y
041-163-11		Y	Y	Y	Y	Y		Y
041-163-12	Y	Y	Y	Y	Y	Y		Y
041-163-13	Y				Y	Y		Y
041-163-14	Y	Y			Y	Y		Y
041-164-01	Y			Y	Y	Y		Y
041-164-02	Y				Y	Y		Y
041-164-03				Y	Y	Y		Y
041-164-04	Y			Y	Y	Y		Y
041-164-05				Y	Y	Y		Y
041-165-01	Y	Y		Y	Y	Y		Y
041-165-02		Y			Y	Y		Y
041-165-03		Y	Y		Y	Y		Y
041-165-05		Y	Y		Y	Y		Y
041-165-06					Y	Y		Y
041-165-07					Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
041-165-08	Y		Y	Y	Y	Y		Y
041-165-09		Y	Y		Y	Y		Y
041-165-10		Y	Y		Y	Y		Y
041-165-11	Y	Y	Y		Y	Y		Y
041-165-12		Y	Y		Y	Y		Y
041-166-01					Y	Y		Y
041-166-02					Y	Y		Y
041-166-03					Y	Y		Y
041-166-04					Y	Y		Y
041-166-05		Y			Y	Y	Y	Y
041-170-02	Y	Y		Y	Y	Y		Y
041-170-03	Y	Y		Y	Y	Y		Y
041-170-04					Y	Y		Y
041-170-05	Y	Y			Y	Y		Y
041-170-06	Y				Y	Y		Y
041-170-07		Y			Y	Y		Y
041-170-11		Y	Y	Y	Y	Y		Y
041-170-12		Y	Y		Y	Y		Y
041-170-13		Y	Y		Y	Y		Y
041-180-08		Y			Y	Y		Y
041-180-09		Y			Y	Y		Y
041-180-10		Y	Y		Y	Y		Y
041-180-11		Y	Y		Y	Y		Y
041-180-14	Y				Y	Y		Y
041-180-15	Y				Y	Y		Y
041-180-16	Y	Y			Y	Y		Y
041-180-17	Y	Y			Y	Y		Y
041-180-19	Y	Y			Y	Y		Y
041-180-21	Y				Y	Y		Y
041-180-23	Y				Y	Y		Y
041-180-26		Y			Y	Y		Y
041-180-28		Y	Y		Y	Y		Y
041-180-29	Y			Y	Y	Y		Y
041-180-30	Y	Y		Y	Y	Y		Y
041-180-31	Y			Y	Y	Y		Y
041-190-11	Y				Y	Y		Y
041-190-12	Y				Y	Y		Y
041-190-13	Y				Y	Y		Y
041-190-14	Y	Y			Y	Y		Y
041-190-15	Y				Y	Y		Y
041-190-16				Y	Y	Y		Y
041-190-17		Y		Y	Y	Y		Y
041-190-18		Y		Y	Y	Y		Y
041-190-19		Y	Y		Y	Y		Y
041-190-20			Y		Y	Y		Y
041-190-21	Y			Y	Y	Y		Y
041-190-22		Y			Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
041-190-23		Y	Y		Y	Y		Y
041-190-24	Y	Y			Y	Y		Y
041-190-25		Y	Y		Y	Y		Y
041-190-26	Y	Y			Y	Y		Y
041-190-27		Y			Y	Y		Y
041-190-36		Y			Y	Y		Y
041-190-37					Y	Y		Y
041-190-39		Y			Y	Y		Y
041-190-40		Y			Y	Y		Y
041-210-05	Y		Y		Y	Y		Y
041-210-06	Y		Y		Y	Y		Y
041-210-07	Y	Y	Y		Y	Y		Y
041-210-11	Y	Y	Y	Y	Y	Y		Y
041-210-14					Y	Y		Y
041-210-16		Y	Y		Y	Y		Y
041-210-17	Y	Y	Y		Y	Y		Y
041-210-19			Y		Y	Y		Y
041-210-20		Y			Y	Y		Y
041-210-21		Y	Y		Y	Y		Y
041-210-22		Y	Y		Y	Y		Y
041-220-02					Y	Y		Y
041-230-01		Y	Y		Y	Y		Y
041-230-02		Y	Y		Y	Y		Y
041-230-03		Y	Y		Y	Y		Y
041-230-04		Y	Y		Y	Y		Y
041-230-05		Y			Y	Y		Y
041-230-08					Y	Y		Y
041-230-09		Y			Y	Y		Y
041-230-10		Y			Y	Y		Y
041-230-11		Y	Y		Y	Y		Y
041-230-12			Y		Y	Y		Y
041-230-13			Y		Y	Y		Y
041-230-14	Y		Y		Y	Y		Y
041-230-15	Y		Y		Y	Y		Y
041-230-16			Y		Y	Y		Y
041-230-18			Y		Y	Y		Y
041-230-19	Y		Y		Y	Y		Y
041-230-20	Y	Y	Y		Y	Y		Y
041-230-21	Y		Y		Y	Y		Y
041-230-22	Y	Y	Y		Y	Y		Y
041-230-23	Y	Y	Y		Y	Y		Y
041-230-24	Y		Y		Y	Y		Y
041-230-25	Y		Y		Y	Y		Y
041-230-28			Y		Y	Y		Y
041-230-29		Y	Y		Y	Y		Y
041-230-30	Y		Y		Y	Y		Y
041-230-31		Y	Y		Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
041-230-32			Y		Y	Y		Y
041-230-33	Y	Y	Y		Y	Y		Y
041-230-34	Y	Y	Y		Y	Y		Y
041-230-35	Y		Y		Y	Y		Y
041-230-38	Y		Y		Y	Y		Y
041-230-39		Y	Y		Y	Y		Y
041-230-40					Y	Y		Y
041-230-41					Y	Y		Y
041-230-42					Y	Y		Y
041-230-43			Y		Y	Y		Y
041-240-03		Y	Y		Y	Y		Y
041-240-06					Y	Y		Y
041-240-27		Y			Y	Y		Y
041-240-28					Y	Y		Y
041-240-29		Y			Y	Y		Y
041-240-32		Y	Y		Y	Y		Y
041-240-41					Y	Y		Y
041-240-44					Y	Y		Y
041-274-51					Y	Y	Y	Y
041-274-52				Y	Y	Y		Y
041-274-53		Y			Y	Y		Y
041-274-54		Y			Y	Y		Y
041-274-56		Y			Y	Y		Y
041-276-15	Y				Y	Y		Y
041-276-16		Y			Y	Y		Y
041-300-01		Y		Y	Y	Y		Y
041-300-03					Y	Y		Y
041-300-04					Y	Y		Y
041-300-06			Y		Y	Y		Y
041-300-08		Y	Y		Y	Y		Y
041-300-09		Y	Y		Y	Y		Y
041-300-10		Y	Y		Y	Y		Y
041-300-12					Y	Y		Y
041-300-15			Y		Y	Y		Y
041-300-16		Y	Y		Y	Y		Y
041-340-01		Y	Y		Y	Y		Y
041-340-02		Y	Y		Y	Y		Y
041-340-03			Y		Y	Y		Y
041-390-01		Y	Y		Y	Y		Y
041-390-02		Y	Y		Y	Y		Y
041-390-03		Y	Y		Y	Y		Y
041-390-04		Y	Y		Y	Y		Y
043-021-03					Y	Y		Y
043-021-09					Y	Y		Y
043-021-11		Y			Y	Y		Y
043-021-13					Y	Y		Y
043-023-01					Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
043-023-02					Y	Y		Y
043-023-03			Y		Y	Y		Y
043-023-04					Y	Y		Y
043-023-06		Y	Y		Y	Y		Y
043-023-09			Y		Y	Y		Y
043-023-10			Y		Y	Y		Y
043-025-01		Y	Y		Y	Y		Y
043-025-02		Y	Y		Y	Y		Y
043-025-03		Y	Y		Y	Y		Y
043-025-04		Y			Y	Y	Y	Y
043-025-05		Y			Y	Y		Y
043-025-06		Y			Y	Y		Y
043-025-08		Y			Y	Y		Y
043-025-09		Y			Y	Y		Y
043-025-13			Y		Y	Y		Y
043-025-16		Y			Y	Y		Y
043-025-17					Y	Y		Y
043-025-18			Y		Y	Y		Y
043-026-03			Y		Y	Y		Y
043-026-04		Y	Y		Y	Y		Y
043-026-05		Y	Y		Y	Y		Y
043-026-06		Y	Y		Y	Y		Y
043-026-07		Y			Y	Y		Y
043-026-08		Y		Y	Y	Y		Y
043-026-09					Y	Y		Y
043-026-10					Y	Y		Y
043-026-11					Y	Y		Y
043-026-16		Y		Y	Y	Y		Y
043-027-02		Y			Y	Y		Y
043-027-03		Y			Y	Y		Y
043-027-04		Y			Y	Y		Y
043-027-05		Y		Y	Y	Y		Y
043-027-06		Y			Y	Y		Y
043-027-07		Y			Y	Y	Y	Y
043-027-08					Y	Y		Y
043-027-09		Y		Y	Y	Y		Y
043-027-10		Y		Y	Y	Y		Y
043-027-11		Y		Y	Y	Y		Y
043-028-01		Y		Y	Y	Y		Y
043-028-02		Y			Y	Y		Y
043-028-03		Y			Y	Y		Y
043-028-04		Y		Y	Y	Y		Y
043-028-05		Y		Y	Y	Y		Y
043-028-06		Y		Y	Y	Y		Y
043-028-07		Y			Y	Y		Y
043-028-10					Y	Y		Y
043-028-11		Y			Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
043-035-06		Y		Y	Y	Y	Y	Y
043-035-07		Y		Y	Y	Y	Y	Y
043-035-12		Y		Y	Y	Y	Y	Y
043-035-13		Y		Y	Y	Y	Y	Y
043-035-14		Y		Y	Y	Y	Y	Y
043-035-15		Y		Y	Y	Y	Y	Y
043-035-16		Y		Y	Y	Y		Y
043-035-17		Y		Y	Y	Y	Y	Y
043-035-27		Y			Y	Y	Y	Y
043-035-32					Y	Y		Y
043-036-05					Y	Y		Y
043-036-09		Y			Y	Y	Y	Y
043-036-10					Y	Y		Y
043-036-11					Y	Y		Y
043-036-12		Y		Y	Y	Y	Y	Y
043-036-13		Y		Y	Y	Y		Y
043-036-21					Y	Y		Y
043-037-05					Y	Y		Y
043-037-06					Y	Y		Y
043-037-07					Y	Y	Y	Y
043-037-08					Y	Y		Y
043-037-09					Y	Y		Y
043-042-04					Y	Y		Y
043-044-10					Y	Y		Y
043-044-11					Y	Y		Y
043-045-05					Y	Y	Y	Y
043-045-06					Y	Y		Y
043-045-07					Y	Y		Y
043-045-20					Y	Y		Y
043-046-09		Y		Y	Y	Y		Y
043-046-10				Y	Y	Y		Y
043-046-11		Y		Y	Y	Y	Y	Y
043-046-12		Y		Y	Y	Y	Y	Y
043-046-13					Y	Y		Y
043-046-14					Y	Y		Y
043-046-15					Y	Y		Y
043-046-17				Y	Y	Y		Y
043-047-03				Y	Y	Y		Y
043-047-04		Y		Y	Y	Y		Y
043-047-05				Y	Y	Y		Y
043-047-07				Y	Y	Y		Y
043-047-09					Y	Y		Y
043-048-01		Y		Y	Y	Y		Y
043-048-02				Y	Y	Y		Y
043-048-03		Y		Y	Y	Y		Y
043-048-04		Y		Y	Y	Y		Y
043-048-05					Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
043-050-03		Y			Y	Y		Y
043-050-04		Y	Y		Y	Y		Y
043-050-05					Y	Y		Y
043-050-06					Y	Y		Y
043-050-08					Y	Y		Y
043-050-10					Y	Y		Y
043-050-12		Y			Y	Y		Y
043-050-13					Y	Y		Y
043-050-15					Y	Y		Y
043-050-16					Y	Y		Y
043-050-17					Y	Y		Y
043-050-18					Y	Y		Y
043-061-01				Y	Y	Y		Y
043-061-02		Y		Y	Y	Y		Y
043-061-03					Y	Y		Y
043-062-04	Y		Y	Y	Y	Y		Y
043-062-05	Y	Y	Y		Y	Y		Y
043-062-06	Y	Y	Y	Y	Y	Y		Y
043-062-07	Y		Y		Y	Y		Y
043-062-08	Y	Y	Y	Y	Y	Y		Y
043-062-09	Y	Y	Y	Y	Y	Y		Y
043-062-10		Y	Y		Y	Y		Y
043-062-11		Y	Y		Y	Y		Y
043-062-15			Y		Y	Y		Y
043-062-16		Y	Y	Y	Y	Y		Y
043-062-17		Y	Y	Y	Y	Y	Y	Y
043-063-01		Y		Y	Y	Y		Y
043-063-02			Y	Y	Y	Y		Y
043-063-03	Y		Y	Y	Y	Y		Y
043-063-04	Y	Y	Y	Y	Y	Y		Y
043-063-05		Y	Y		Y	Y		Y
043-063-06	Y	Y	Y		Y	Y		Y
043-063-07			Y		Y	Y		Y
043-063-08			Y		Y	Y		Y
043-063-09		Y			Y	Y	Y	Y
043-064-01		Y	Y		Y	Y	Y	Y
043-064-02		Y	Y		Y	Y		Y
043-064-05			Y		Y	Y		Y
043-064-06			Y		Y	Y		Y
043-064-07	Y	Y	Y	Y	Y	Y		Y
043-064-08	Y			Y	Y	Y		Y
043-064-09	Y	Y		Y	Y	Y		Y
043-064-10	Y		Y		Y	Y		Y
043-064-11	Y	Y	Y	Y	Y	Y		Y
043-064-12	Y	Y	Y		Y	Y		Y
043-064-13			Y		Y	Y		Y
043-065-01		Y			Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
043-066-01	Y				Y	Y		Y
043-066-05	Y	Y			Y	Y		Y
043-066-06	Y				Y	Y		Y
043-066-07	Y	Y			Y	Y		Y
043-066-08		Y		Y	Y	Y		Y
043-066-09	Y				Y	Y		Y
043-066-10	Y	Y		Y	Y	Y		Y
043-066-11	Y				Y	Y		Y
043-066-12				Y	Y	Y		Y
043-066-13	Y	Y			Y	Y		Y
043-066-14	Y			Y	Y	Y		Y
043-066-15		Y		Y	Y	Y		Y
043-066-16	Y	Y			Y	Y		Y
043-066-17	Y	Y			Y	Y		Y
043-066-19	Y				Y	Y		Y
043-066-20	Y	Y			Y	Y		Y
043-067-01		Y			Y	Y		Y
043-067-02					Y	Y		Y
043-067-03	Y	Y		Y	Y	Y		Y
043-067-04	Y	Y		Y	Y	Y		Y
043-067-05	Y	Y		Y	Y	Y		Y
043-067-06	Y	Y		Y	Y	Y		Y
043-067-07	Y			Y	Y	Y		Y
043-067-08	Y	Y		Y	Y	Y		Y
043-067-09	Y			Y	Y	Y		Y
043-067-10				Y	Y	Y		Y
043-067-11	Y	Y	Y	Y	Y	Y		Y
043-067-12	Y		Y	Y	Y	Y		Y
043-067-13	Y	Y	Y	Y	Y	Y		Y
043-067-14					Y	Y		Y
043-067-15					Y	Y		Y
043-068-03		Y			Y	Y		Y
043-071-01					Y	Y		Y
043-071-02			Y		Y	Y		Y
043-071-03			Y		Y	Y		Y
043-071-04		Y	Y	Y	Y	Y		Y
043-071-05		Y	Y	Y	Y	Y	Y	Y
043-071-12			Y		Y	Y	Y	Y
043-071-13			Y	Y	Y	Y		Y
043-071-14		Y	Y	Y	Y	Y		Y
043-071-15		Y	Y	Y	Y	Y		Y
043-071-16	Y	Y	Y	Y	Y	Y		Y
043-071-17					Y	Y		Y
043-071-20		Y		Y	Y	Y		Y
043-071-21		Y			Y	Y		Y
043-071-22		Y			Y	Y		Y
043-072-01		Y			Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
043-072-02		Y		Y	Y	Y		Y
043-072-03		Y		Y	Y	Y		Y
043-072-08		Y	Y		Y	Y		Y
043-072-09		Y	Y		Y	Y		Y
043-072-10		Y	Y	Y	Y	Y	Y	Y
043-072-11		Y	Y		Y	Y		Y
043-072-12					Y	Y		Y
043-072-13			Y	Y	Y	Y	Y	Y
043-072-14	Y	Y	Y	Y	Y	Y		Y
043-072-15		Y	Y	Y	Y	Y		Y
043-072-16		Y	Y	Y	Y	Y		Y
043-073-01					Y	Y		Y
043-073-02		Y	Y		Y	Y		Y
043-073-03	Y				Y	Y		Y
043-073-04	Y	Y			Y	Y		Y
043-073-05	Y		Y		Y	Y		Y
043-073-06	Y	Y	Y		Y	Y		Y
043-073-07		Y	Y		Y	Y		Y
043-073-08	Y	Y	Y		Y	Y		Y
043-073-09		Y	Y		Y	Y		Y
043-074-01		Y	Y		Y	Y		Y
043-074-05		Y	Y		Y	Y		Y
043-074-06					Y	Y		Y
043-074-07	Y				Y	Y		Y
043-074-08	Y		Y		Y	Y		Y
043-074-09	Y		Y		Y	Y		Y
043-074-10	Y		Y	Y	Y	Y		Y
043-074-11				Y	Y	Y		Y
043-074-12				Y	Y	Y		Y
043-074-13	Y	Y		Y	Y	Y		Y
043-074-14	Y	Y	Y		Y	Y		Y
043-074-15		Y	Y	Y	Y	Y		Y
043-074-16	Y	Y	Y		Y	Y		Y
043-075-01	Y				Y	Y		Y
043-075-02	Y				Y	Y		Y
043-075-03	Y	Y			Y	Y		Y
043-075-04	Y	Y			Y	Y		Y
043-075-05	Y	Y		Y	Y	Y		Y
043-075-08	Y	Y		Y	Y	Y		Y
043-075-09	Y	Y		Y	Y	Y		Y
043-075-10	Y	Y		Y	Y	Y		Y
043-075-11	Y			Y	Y	Y		Y
043-075-12		Y		Y	Y	Y		Y
043-075-13	Y				Y	Y		Y
043-075-14	Y	Y			Y	Y		Y
043-075-15	Y		Y		Y	Y		Y
043-075-16		Y	Y		Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
043-075-17		Y	Y		Y	Y		Y
043-075-18	Y			Y	Y	Y		Y
043-076-01		Y			Y	Y		Y
043-076-02	Y	Y		Y	Y	Y		Y
043-076-03	Y	Y		Y	Y	Y		Y
043-076-04	Y	Y			Y	Y		Y
043-076-05		Y			Y	Y		Y
043-076-06		Y			Y	Y		Y
043-076-07	Y				Y	Y		Y
043-076-08	Y	Y			Y	Y		Y
043-076-09		Y			Y	Y		Y
043-076-10	Y	Y		Y	Y	Y		Y
043-076-11	Y				Y	Y		Y
043-076-12	Y	Y			Y	Y		Y
043-076-13					Y	Y		Y
043-076-14	Y	Y			Y	Y		Y
043-076-15	Y	Y			Y	Y		Y
043-076-16	Y			Y	Y	Y		Y
043-076-17	Y	Y		Y	Y	Y		Y
043-081-01		Y		Y	Y	Y		Y
043-081-02		Y		Y	Y	Y		Y
043-081-03		Y		Y	Y	Y	Y	Y
043-081-04					Y	Y		Y
043-082-03		Y		Y	Y	Y		Y
043-082-04		Y			Y	Y	Y	Y
043-083-01		Y	Y		Y	Y		Y
043-083-02	Y		Y		Y	Y		Y
043-083-03	Y	Y	Y		Y	Y		Y
043-083-04		Y	Y		Y	Y		Y
043-083-05			Y		Y	Y		Y
043-083-06		Y	Y		Y	Y		Y
043-083-07		Y	Y		Y	Y		Y
043-083-08			Y		Y	Y		Y
043-084-06		Y			Y	Y		Y
043-084-07		Y			Y	Y		Y
043-084-11	Y				Y	Y		Y
043-085-02	Y	Y	Y		Y	Y		Y
043-085-03		Y			Y	Y		Y
043-085-04	Y			Y	Y	Y		Y
043-085-08	Y	Y			Y	Y		Y
043-085-10		Y			Y	Y		Y
043-085-11		Y			Y	Y		Y
043-085-12		Y			Y	Y		Y
043-085-13		Y		Y	Y	Y		Y
043-085-14	Y	Y		Y	Y	Y		Y
043-085-15	Y	Y			Y	Y	Y	Y
043-085-16	Y				Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
043-085-17					Y	Y		Y
043-085-19	Y	Y	Y		Y	Y		Y
043-085-20		Y	Y		Y	Y		Y
043-085-21		Y	Y		Y	Y		Y
043-086-01					Y	Y		Y
043-087-01	Y	Y			Y	Y		Y
043-087-02	Y	Y			Y	Y		Y
043-087-03	Y				Y	Y		Y
043-087-04	Y	Y			Y	Y		Y
043-087-05	Y	Y		Y	Y	Y		Y
043-087-08					Y	Y		Y
043-087-09	Y				Y	Y		Y
043-087-10		Y			Y	Y		Y
043-087-11	Y	Y			Y	Y		Y
043-087-12	Y				Y	Y		Y
043-087-13	Y	Y			Y	Y		Y
043-087-15	Y	Y			Y	Y		Y
043-087-16	Y	Y		Y	Y	Y		Y
043-087-17					Y	Y		Y
043-088-01	Y	Y			Y	Y		Y
043-088-02	Y	Y		Y	Y	Y		Y
043-088-03		Y		Y	Y	Y		Y
043-088-04	Y	Y		Y	Y	Y		Y
043-088-05	Y			Y	Y	Y		Y
043-088-06	Y			Y	Y	Y		Y
043-088-07				Y	Y	Y		Y
043-088-08		Y		Y	Y	Y		Y
043-088-09	Y	Y		Y	Y	Y		Y
043-088-10	Y				Y	Y		Y
043-088-11		Y			Y	Y		Y
043-088-12	Y			Y	Y	Y		Y
043-088-13	Y	Y		Y	Y	Y		Y
043-088-14	Y	Y		Y	Y	Y		Y
043-088-15	Y			Y	Y	Y		Y
043-088-16	Y	Y		Y	Y	Y		Y
043-088-17	Y			Y	Y	Y		Y
043-088-18	Y			Y	Y	Y		Y
043-088-19	Y			Y	Y	Y		Y
043-088-20	Y	Y		Y	Y	Y		Y
043-088-21	Y	Y			Y	Y		Y
043-088-22	Y			Y	Y	Y		Y
043-088-23	Y			Y	Y	Y		Y
043-088-24	Y	Y		Y	Y	Y		Y
043-090-01	Y	Y			Y	Y	Y	Y
043-090-02	Y	Y			Y	Y		Y
043-090-03	Y	Y			Y	Y		Y
043-090-04	Y	Y			Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
043-090-05	Y	Y			Y	Y		Y
043-090-06	Y				Y	Y		Y
043-090-07	Y				Y	Y		Y
043-090-08	Y	Y			Y	Y		Y
043-090-09	Y	Y			Y	Y		Y
043-090-10	Y				Y	Y		Y
043-090-11		Y			Y	Y		Y
043-090-13					Y	Y		Y
043-090-14		Y			Y	Y		Y
043-100-01	Y				Y	Y		Y
043-100-02		Y			Y	Y		Y
043-100-03		Y			Y	Y		Y
043-100-04	Y			Y	Y	Y		Y
043-100-05	Y			Y	Y	Y		Y
043-100-06	Y				Y	Y		Y
043-111-01	Y	Y		Y	Y	Y		Y
043-111-02	Y			Y	Y	Y		Y
043-111-03	Y			Y	Y	Y		Y
043-111-04	Y	Y		Y	Y	Y		Y
043-111-05		Y			Y	Y		Y
043-111-06	Y			Y	Y	Y		Y
043-111-07	Y	Y			Y	Y		Y
043-111-08	Y			Y	Y	Y		Y
043-111-09					Y	Y		Y
043-111-10	Y				Y	Y		Y
043-111-11					Y	Y		Y
043-111-12	Y				Y	Y		Y
043-111-13	Y	Y		Y	Y	Y		Y
043-111-14	Y	Y			Y	Y		Y
043-111-15	Y	Y		Y	Y	Y		Y
043-111-16	Y	Y			Y	Y		Y
043-111-17	Y	Y		Y	Y	Y		Y
043-112-01					Y	Y		Y
043-112-02	Y	Y			Y	Y		Y
043-112-03	Y	Y			Y	Y		Y
043-112-04	Y			Y	Y	Y		Y
043-112-05	Y				Y	Y		Y
043-112-06	Y				Y	Y		Y
043-112-07	Y				Y	Y		Y
043-112-08	Y	Y		Y	Y	Y		Y
043-112-09	Y	Y		Y	Y	Y		Y
043-112-10	Y	Y		Y	Y	Y		Y
043-112-11	Y				Y	Y		Y
043-112-12	Y				Y	Y		Y
043-112-13	Y	Y		Y	Y	Y		Y
043-112-14	Y				Y	Y		Y
043-112-15	Y	Y		Y	Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
043-112-16	Y			Y	Y	Y		Y
043-112-17		Y			Y	Y		Y
043-113-01	Y	Y			Y	Y		Y
043-113-02	Y	Y			Y	Y		Y
043-113-03	Y				Y	Y		Y
043-113-04	Y	Y			Y	Y		Y
043-113-05	Y	Y			Y	Y		Y
043-113-06		Y			Y	Y		Y
043-113-07		Y			Y	Y		Y
043-113-08	Y	Y			Y	Y		Y
043-113-12	Y	Y			Y	Y		Y
043-113-13	Y				Y	Y		Y
043-113-14	Y	Y			Y	Y		Y
043-113-15	Y	Y			Y	Y		Y
043-113-16	Y	Y			Y	Y		Y
043-113-17		Y			Y	Y		Y
043-113-18	Y	Y		Y	Y	Y		Y
043-113-19	Y				Y	Y		Y
043-113-20	Y	Y			Y	Y		Y
043-113-21	Y	Y			Y	Y		Y
043-113-22	Y			Y	Y	Y		Y
043-113-23	Y	Y			Y	Y		Y
043-113-24	Y	Y			Y	Y		Y
043-113-25	Y	Y		Y	Y	Y		Y
043-113-26	Y	Y			Y	Y		Y
043-113-27					Y	Y		Y
043-113-28		Y			Y	Y		Y
043-114-01	Y	Y			Y	Y		Y
043-114-02	Y			Y	Y	Y		Y
043-114-03		Y			Y	Y		Y
043-114-04					Y	Y		Y
043-114-05	Y	Y			Y	Y		Y
043-114-06	Y	Y		Y	Y	Y		Y
043-114-07	Y	Y		Y	Y	Y		Y
043-114-08	Y				Y	Y		Y
043-114-09	Y				Y	Y		Y
043-114-10	Y	Y		Y	Y	Y		Y
043-114-11	Y	Y		Y	Y	Y		Y
043-114-12	Y	Y			Y	Y		Y
043-114-13					Y	Y		Y
043-114-14	Y				Y	Y		Y
043-114-15	Y	Y			Y	Y		Y
043-114-16	Y				Y	Y		Y
043-114-17	Y	Y			Y	Y		Y
043-114-18	Y			Y	Y	Y		Y
043-114-19		Y			Y	Y		Y
043-114-20	Y				Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
043-114-21	Y	Y			Y	Y		Y
043-114-22	Y				Y	Y		Y
043-114-23					Y	Y		Y
043-114-24		Y			Y	Y		Y
043-114-25	Y			Y	Y	Y		Y
043-114-26		Y			Y	Y		Y
043-114-27	Y	Y			Y	Y		Y
043-121-01		Y			Y	Y		Y
043-121-02	Y	Y			Y	Y		Y
043-121-03	Y	Y	Y		Y	Y		Y
043-121-04	Y		Y		Y	Y		Y
043-121-11	Y	Y		Y	Y	Y		Y
043-121-12	Y	Y			Y	Y		Y
043-122-01	Y	Y			Y	Y		Y
043-122-02	Y	Y			Y	Y		Y
043-122-03	Y	Y		Y	Y	Y		Y
043-122-04	Y	Y		Y	Y	Y		Y
043-122-05		Y			Y	Y		Y
043-122-06	Y	Y			Y	Y		Y
043-122-07	Y			Y	Y	Y		Y
043-122-08		Y			Y	Y		Y
043-122-09	Y	Y			Y	Y		Y
043-122-10		Y	Y		Y	Y		Y
043-122-11	Y				Y	Y		Y
043-122-12	Y				Y	Y		Y
043-122-14	Y				Y	Y		Y
043-122-15	Y				Y	Y		Y
043-122-16	Y	Y		Y	Y	Y		Y
043-122-17	Y				Y	Y		Y
043-122-18	Y	Y			Y	Y		Y
043-122-19	Y	Y			Y	Y		Y
043-122-20					Y	Y		Y
043-122-21	Y				Y	Y		Y
043-122-22		Y		Y	Y	Y		Y
043-122-23	Y	Y			Y	Y		Y
043-123-01	Y	Y	Y		Y	Y		Y
043-123-02			Y		Y	Y		Y
043-123-03	Y	Y	Y		Y	Y		Y
043-123-04	Y	Y			Y	Y		Y
043-123-05	Y	Y			Y	Y		Y
043-123-06	Y	Y			Y	Y		Y
043-123-07		Y			Y	Y		Y
043-123-08		Y			Y	Y		Y
043-123-09	Y	Y			Y	Y		Y
043-123-10	Y			Y	Y	Y		Y
043-123-11				Y	Y	Y		Y
043-123-12	Y	Y			Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
043-123-13	Y	Y			Y	Y		Y
043-123-14	Y	Y			Y	Y		Y
043-123-15	Y	Y			Y	Y		Y
043-123-16	Y	Y			Y	Y		Y
043-123-17					Y	Y		Y
043-123-18	Y	Y	Y	Y	Y	Y		Y
043-123-19	Y	Y	Y		Y	Y		Y
043-123-20		Y	Y		Y	Y		Y
043-123-21	Y	Y	Y		Y	Y		Y
043-123-22	Y		Y		Y	Y		Y
043-123-23	Y		Y	Y	Y	Y		Y
043-124-01	Y				Y	Y		Y
043-124-02	Y	Y		Y	Y	Y		Y
043-124-03	Y	Y			Y	Y		Y
043-124-04	Y	Y			Y	Y		Y
043-124-05		Y			Y	Y		Y
043-124-06	Y				Y	Y		Y
043-124-07		Y			Y	Y		Y
043-124-08	Y	Y			Y	Y		Y
043-124-09	Y				Y	Y		Y
043-124-10				Y	Y	Y		Y
043-124-11	Y				Y	Y		Y
043-124-12	Y	Y		Y	Y	Y		Y
043-124-13	Y				Y	Y		Y
043-124-14	Y				Y	Y		Y
043-124-15	Y				Y	Y		Y
043-124-16	Y	Y			Y	Y		Y
043-124-17	Y				Y	Y		Y
043-124-18	Y				Y	Y		Y
043-124-19	Y				Y	Y		Y
043-124-20	Y				Y	Y		Y
043-124-21	Y				Y	Y		Y
043-124-22	Y				Y	Y		Y
043-124-23	Y				Y	Y		Y
043-124-24	Y				Y	Y		Y
043-124-25					Y	Y		Y
043-130-01	Y	Y			Y	Y		Y
043-130-02	Y	Y			Y	Y		Y
043-130-03	Y				Y	Y		Y
043-130-04	Y	Y			Y	Y		Y
043-130-05	Y	Y			Y	Y		Y
043-130-06	Y	Y			Y	Y		Y
043-130-07	Y	Y	Y		Y	Y		Y
043-130-08	Y	Y	Y		Y	Y		Y
043-130-09	Y		Y		Y	Y		Y
043-130-10	Y		Y	Y	Y	Y		Y
043-130-11	Y	Y	Y		Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
043-130-12	Y	Y			Y	Y		Y
043-130-13	Y	Y			Y	Y		Y
043-130-14					Y	Y		Y
043-130-15	Y	Y			Y	Y		Y
043-130-16	Y	Y		Y	Y	Y		Y
043-130-17	Y	Y			Y	Y		Y
043-130-18	Y				Y	Y		Y
043-130-19	Y	Y	Y		Y	Y		Y
043-130-20	Y	Y	Y		Y	Y		Y
043-130-21	Y	Y	Y	Y	Y	Y		Y
043-130-22		Y	Y		Y	Y		Y
043-130-23	Y	Y	Y		Y	Y		Y
043-130-24	Y		Y		Y	Y		Y
043-130-25	Y		Y		Y	Y		Y
043-130-26	Y		Y		Y	Y		Y
043-130-27	Y	Y	Y		Y	Y		Y
043-130-28	Y	Y	Y		Y	Y		Y
043-130-29	Y		Y		Y	Y		Y
043-130-30			Y		Y	Y		Y
043-130-31		Y	Y		Y	Y		Y
043-130-32		Y	Y		Y	Y		Y
043-130-33		Y	Y	Y	Y	Y		Y
043-130-34		Y	Y		Y	Y	Y	Y
043-130-35	Y	Y	Y		Y	Y		Y
043-130-36		Y	Y		Y	Y		Y
043-130-37	Y		Y		Y	Y		Y
043-130-38	Y	Y	Y		Y	Y		Y
043-130-39	Y	Y	Y		Y	Y		Y
043-130-40	Y	Y	Y		Y	Y		Y
043-140-01					Y	Y		Y
043-140-02	Y	Y			Y	Y		Y
043-140-03	Y	Y			Y	Y		Y
043-140-04	Y				Y	Y		Y
043-140-05	Y	Y			Y	Y		Y
043-140-06	Y				Y	Y		Y
043-140-07	Y	Y			Y	Y		Y
043-140-08	Y	Y			Y	Y		Y
043-140-09	Y	Y			Y	Y		Y
043-140-10	Y	Y			Y	Y		Y
043-140-11	Y				Y	Y		Y
043-140-12	Y				Y	Y		Y
043-140-13	Y				Y	Y		Y
043-140-14	Y	Y			Y	Y		Y
043-140-15		Y			Y	Y		Y
043-140-16		Y			Y	Y		Y
043-140-17		Y			Y	Y		Y
043-140-18	Y	Y			Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
043-140-19	Y		Y		Y	Y		Y
043-140-20			Y		Y	Y		Y
043-140-21		Y	Y		Y	Y		Y
043-140-32	Y				Y	Y		Y
043-140-33	Y		Y		Y	Y		Y
043-140-34	Y	Y			Y	Y		Y
043-140-35					Y	Y		Y
043-140-36	Y				Y	Y		Y
043-140-37	Y	Y	Y		Y	Y		Y
043-140-38	Y				Y	Y		Y
043-140-39	Y		Y		Y	Y		Y
043-140-40	Y				Y	Y		Y
043-140-41	Y	Y	Y		Y	Y		Y
043-140-42					Y	Y		Y
043-140-43	Y	Y	Y	Y	Y	Y		Y
043-140-44	Y	Y	Y		Y	Y		Y
043-140-45	Y	Y	Y	Y	Y	Y		Y
043-140-46		Y	Y		Y	Y		Y
043-140-47		Y	Y		Y	Y		Y
043-140-49	Y				Y	Y		Y
043-140-50	Y				Y	Y		Y
043-140-51	Y		Y		Y	Y		Y
043-140-52		Y	Y		Y	Y		Y
043-140-53	Y	Y	Y		Y	Y		Y
043-140-54		Y			Y	Y		Y
043-140-55	Y		Y		Y	Y		Y
043-140-56	Y	Y	Y		Y	Y		Y
043-140-57	Y	Y	Y		Y	Y		Y
043-140-58		Y	Y		Y	Y		Y
043-150-01	Y	Y			Y	Y		Y
043-150-02		Y			Y	Y		Y
043-150-03	Y				Y	Y		Y
043-150-04	Y				Y	Y		Y
043-150-05		Y			Y	Y		Y
043-150-06	Y				Y	Y		Y
043-150-07	Y		Y		Y	Y		Y
043-150-08	Y	Y	Y		Y	Y		Y
043-150-09			Y		Y	Y		Y
043-150-10		Y	Y		Y	Y		Y
043-150-11		Y	Y		Y	Y		Y
043-160-01	Y				Y	Y		Y
043-160-02	Y	Y			Y	Y		Y
043-160-03		Y			Y	Y		Y
043-160-04	Y	Y			Y	Y		Y
043-160-05	Y				Y	Y		Y
043-160-06	Y	Y			Y	Y		Y
043-160-07	Y	Y		Y	Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
043-160-08					Y	Y		Y
043-160-09	Y	Y			Y	Y		Y
043-160-10	Y			Y	Y	Y		Y
043-160-11	Y				Y	Y		Y
043-170-01	Y			Y	Y	Y		Y
043-170-02	Y	Y			Y	Y		Y
043-170-03	Y	Y			Y	Y		Y
043-170-06					Y	Y		Y
043-170-07	Y	Y			Y	Y		Y
043-170-08					Y	Y		Y
043-170-09	Y	Y			Y	Y		Y
043-170-10		Y			Y	Y		Y
043-170-11					Y	Y		Y
043-170-12		Y			Y	Y		Y
043-170-13					Y	Y		Y
043-180-01					Y	Y		Y
043-180-02					Y	Y		Y
043-180-03		Y			Y	Y	Y	Y
043-180-04	Y				Y	Y		Y
043-180-05	Y	Y			Y	Y		Y
043-180-06	Y				Y	Y		Y
043-180-07	Y			Y	Y	Y		Y
043-180-08	Y	Y			Y	Y		Y
043-180-11	Y	Y		Y	Y	Y		Y
043-180-12	Y				Y	Y		Y
043-180-13	Y	Y		Y	Y	Y		Y
043-180-14	Y	Y			Y	Y		Y
043-180-15	Y	Y		Y	Y	Y		Y
043-180-17	Y	Y		Y	Y	Y		Y
043-180-18	Y				Y	Y		Y
043-180-19		Y		Y	Y	Y		Y
043-190-01	Y	Y			Y	Y		Y
043-190-02	Y				Y	Y		Y
043-190-03	Y	Y			Y	Y		Y
043-190-04		Y		Y	Y	Y		Y
043-190-05	Y	Y			Y	Y		Y
043-190-06	Y	Y		Y	Y	Y		Y
043-190-07		Y			Y	Y		Y
043-190-08		Y			Y	Y		Y
043-190-09	Y	Y			Y	Y		Y
043-190-10	Y				Y	Y		Y
043-190-11	Y	Y			Y	Y		Y
043-190-12	Y				Y	Y		Y
043-190-13	Y			Y	Y	Y		Y
043-190-14	Y				Y	Y		Y
043-190-15	Y	Y		Y	Y	Y		Y
043-190-16		Y			Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
043-190-17		Y			Y	Y		Y
043-190-18			Y		Y	Y		Y
043-190-19		Y			Y	Y		Y
043-190-20		Y			Y	Y		Y
043-190-21		Y			Y	Y		Y
043-190-22	Y	Y			Y	Y		Y
043-190-23		Y			Y	Y		Y
043-190-24		Y			Y	Y		Y
043-190-25		Y			Y	Y		Y
043-190-26		Y			Y	Y		Y
043-190-27	Y	Y			Y	Y		Y
043-190-28		Y			Y	Y		Y
043-190-29	Y	Y			Y	Y		Y
043-190-30	Y			Y	Y	Y		Y
043-190-31	Y	Y		Y	Y	Y		Y
043-190-32		Y			Y	Y		Y
043-190-33	Y			Y	Y	Y		Y
043-190-37	Y	Y			Y	Y		Y
043-201-01	Y	Y			Y	Y		Y
043-201-02		Y			Y	Y		Y
043-201-03	Y				Y	Y		Y
043-201-04	Y				Y	Y		Y
043-201-05	Y	Y			Y	Y		Y
043-201-06	Y	Y			Y	Y		Y
043-201-07					Y	Y		Y
043-201-08					Y	Y		Y
043-201-09		Y			Y	Y		Y
043-201-10	Y				Y	Y		Y
043-201-11	Y				Y	Y		Y
043-201-12	Y			Y	Y	Y		Y
043-201-13	Y	Y		Y	Y	Y		Y
043-201-14	Y	Y			Y	Y		Y
043-201-15				Y	Y	Y		Y
043-201-16	Y				Y	Y		Y
043-201-17	Y	Y		Y	Y	Y		Y
043-201-18	Y	Y			Y	Y		Y
043-201-19		Y			Y	Y		Y
043-201-20	Y				Y	Y		Y
043-201-21	Y	Y			Y	Y		Y
043-201-22	Y	Y			Y	Y		Y
043-201-23	Y				Y	Y		Y
043-201-24	Y				Y	Y		Y
043-201-25	Y	Y			Y	Y		Y
043-201-28	Y	Y			Y	Y		Y
043-201-29	Y	Y		Y	Y	Y		Y
043-201-30	Y	Y			Y	Y		Y
043-201-31	Y	Y			Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
043-201-32		Y			Y	Y		Y
043-201-35	Y				Y	Y		Y
043-201-36	Y				Y	Y		Y
043-201-37	Y	Y			Y	Y		Y
043-201-38	Y	Y			Y	Y		Y
043-202-01	Y	Y	Y	Y	Y	Y		Y
043-202-02	Y		Y	Y	Y	Y		Y
043-202-03	Y		Y	Y	Y	Y		Y
043-202-04	Y		Y	Y	Y	Y		Y
043-202-05	Y		Y	Y	Y	Y		Y
043-202-06		Y	Y		Y	Y		Y
043-202-07		Y	Y		Y	Y		Y
043-202-08		Y	Y		Y	Y		Y
043-202-09		Y	Y		Y	Y		Y
043-202-10			Y		Y	Y		Y
043-202-11		Y	Y		Y	Y		Y
043-202-14	Y	Y	Y		Y	Y		Y
043-202-15		Y	Y		Y	Y		Y
043-202-16	Y	Y	Y		Y	Y		Y
043-202-17		Y	Y		Y	Y		Y
043-202-18	Y	Y	Y		Y	Y		Y
043-202-19	Y	Y	Y		Y	Y		Y
043-202-20	Y	Y	Y		Y	Y		Y
043-202-21	Y		Y		Y	Y		Y
043-202-22	Y	Y	Y		Y	Y		Y
043-202-23			Y		Y	Y		Y
043-202-24	Y	Y			Y	Y		Y
043-202-25	Y	Y			Y	Y		Y
043-202-26		Y	Y		Y	Y		Y
043-202-28			Y		Y	Y		Y
043-202-29		Y	Y		Y	Y	Y	Y
043-210-01					Y	Y		Y
043-210-02		Y			Y	Y		Y
043-210-03					Y	Y		Y
043-210-05		Y		Y	Y	Y		Y
043-210-06		Y	Y	Y	Y	Y		Y
043-210-07	Y		Y		Y	Y		Y
043-210-08		Y	Y	Y	Y	Y		Y
043-210-13		Y	Y		Y	Y		Y
043-210-17		Y			Y	Y		Y
043-210-19					Y	Y		Y
043-210-20		Y	Y		Y	Y	Y	Y
043-210-21		Y	Y		Y	Y		Y
043-210-27		Y	Y		Y	Y		Y
043-210-32	Y	Y	Y		Y	Y	Y	Y
043-210-37		Y	Y		Y	Y	Y	Y
043-210-38	Y	Y	Y		Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
043-210-40		Y	Y		Y	Y		Y
043-210-42		Y	Y		Y	Y		Y
043-210-44		Y			Y	Y		Y
043-210-45					Y	Y		Y
043-210-46			Y		Y	Y		Y
043-210-47			Y		Y	Y		Y
043-210-48		Y			Y	Y		Y
043-210-49					Y	Y		Y
043-210-50		Y	Y		Y	Y		Y
043-210-51		Y	Y		Y	Y		Y
043-210-52	Y	Y	Y		Y	Y		Y
043-210-53	Y	Y	Y		Y	Y		Y
043-210-55		Y		Y	Y	Y		Y
043-210-56		Y			Y	Y		Y
043-210-57		Y			Y	Y		Y
043-210-61		Y			Y	Y		Y
043-210-62					Y	Y		Y
043-210-63		Y			Y	Y		Y
043-210-64		Y	Y		Y	Y		Y
043-210-65		Y	Y		Y	Y	Y	Y
043-210-66	Y	Y	Y		Y	Y		Y
043-210-67			Y		Y	Y		Y
043-220-03					Y	Y		Y
043-220-04					Y	Y		Y
043-220-05					Y	Y		Y
043-220-06		Y			Y	Y		Y
043-220-07		Y			Y	Y		Y
043-220-08		Y			Y	Y		Y
043-220-09		Y			Y	Y		Y
043-220-10		Y			Y	Y		Y
043-220-11		Y			Y	Y		Y
043-220-12		Y			Y	Y		Y
043-220-13		Y			Y	Y		Y
043-220-14		Y			Y	Y		Y
043-220-15		Y			Y	Y		Y
043-220-18					Y	Y		Y
043-230-01	Y		Y		Y	Y		Y
043-230-02		Y	Y		Y	Y		Y
043-230-03	Y		Y		Y	Y		Y
043-230-06					Y	Y		Y
043-230-07		Y			Y	Y		Y
043-230-08					Y	Y		Y
043-230-10					Y	Y		Y
043-230-11		Y			Y	Y		Y
043-230-12			Y		Y	Y		Y
043-230-13		Y	Y		Y	Y	Y	Y
043-230-18	Y	Y	Y		Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
043-230-20		Y			Y	Y		Y
043-230-22					Y	Y		Y
043-230-23					Y	Y		Y
043-230-25		Y			Y	Y		Y
043-250-01			Y		Y	Y		Y
043-250-02			Y		Y	Y		Y
043-250-06		Y			Y	Y		Y
043-250-07		Y			Y	Y		Y
043-250-08					Y	Y		Y
043-250-09					Y	Y		Y
043-250-10		Y			Y	Y		Y
043-250-11		Y			Y	Y		Y
043-250-12					Y	Y		Y
043-250-15					Y	Y		Y
045-020-03		Y			Y	Y		Y
045-020-04		Y	Y		Y	Y		Y
045-020-05	Y	Y	Y		Y	Y		Y
045-020-06		Y	Y		Y	Y		Y
045-020-07	Y		Y		Y	Y		Y
045-020-08		Y	Y	Y	Y	Y	Y	Y
045-020-11		Y	Y	Y	Y	Y		Y
045-020-12			Y		Y	Y		Y
045-020-13	Y	Y	Y	Y	Y	Y		Y
045-020-14		Y	Y	Y	Y	Y		Y
045-020-15	Y		Y		Y	Y		Y
045-020-16			Y	Y	Y	Y		Y
045-020-17			Y		Y	Y		Y
045-020-18	Y	Y	Y		Y	Y		Y
045-020-19	Y		Y		Y	Y		Y
045-020-20		Y	Y		Y	Y		Y
045-020-24	Y	Y	Y		Y	Y		Y
045-020-25			Y	Y	Y	Y		Y
045-020-26	Y	Y	Y		Y	Y		Y
045-020-29		Y	Y		Y	Y		Y
045-020-30	Y	Y	Y		Y	Y		Y
045-020-46		Y			Y	Y		Y
045-020-47		Y			Y	Y		Y
045-020-51	Y		Y		Y	Y		Y
045-020-56			Y		Y	Y		Y
045-020-57			Y		Y	Y		Y
045-130-19					Y	Y		Y
045-130-38		Y			Y	Y		Y
045-140-01					Y	Y		Y
045-140-02					Y	Y		Y
045-150-23	Y	Y			Y	Y		Y
045-150-24	Y	Y			Y	Y		Y
045-150-25	Y	Y			Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
045-150-41		Y			Y	Y		Y
045-150-42	Y	Y			Y	Y		Y
045-150-43	Y	Y			Y	Y		Y
045-201-01		Y	Y		Y	Y		Y
045-201-02	Y	Y	Y		Y	Y		Y
045-201-03	Y		Y		Y	Y		Y
045-201-11	Y	Y	Y		Y	Y		Y
045-201-12	Y	Y	Y		Y	Y		Y
045-201-36		Y			Y	Y		Y
045-201-37		Y			Y	Y		Y
045-210-01					Y	Y		Y
045-210-02					Y	Y		Y
045-210-03					Y	Y		Y
045-210-08		Y	Y		Y	Y		Y
045-210-09		Y	Y		Y	Y		Y
045-210-10	Y		Y	Y	Y	Y		Y
045-210-11	Y		Y		Y	Y		Y
045-210-14	Y		Y		Y	Y		Y
045-210-15		Y	Y		Y	Y		Y
045-210-16	Y	Y			Y	Y		Y
045-210-17	Y			Y	Y	Y		Y
045-210-18	Y	Y			Y	Y		Y
045-210-21			Y		Y	Y		Y
045-210-22		Y	Y		Y	Y		Y
045-210-23		Y	Y	Y	Y	Y		Y
045-210-24	Y		Y		Y	Y		Y
045-230-02	Y	Y	Y		Y	Y		Y
045-230-03		Y	Y	Y	Y	Y		Y
045-230-04	Y		Y		Y	Y		Y
045-230-05	Y	Y	Y		Y	Y		Y
045-230-06	Y	Y	Y		Y	Y		Y
045-230-09	Y		Y		Y	Y		Y
045-230-10	Y		Y	Y	Y	Y		Y
045-230-11	Y		Y		Y	Y		Y
045-230-12	Y		Y		Y	Y		Y
045-230-13		Y	Y		Y	Y		Y
045-230-14	Y	Y	Y	Y	Y	Y		Y
045-230-15	Y		Y	Y	Y	Y		Y
045-230-27	Y		Y	Y	Y	Y		Y
045-230-28	Y		Y		Y	Y		Y
045-230-29			Y		Y	Y		Y
045-240-01	Y	Y	Y	Y	Y	Y		Y
045-240-02		Y	Y	Y	Y	Y		Y
045-240-03		Y	Y	Y	Y	Y		Y
045-240-04	Y		Y	Y	Y	Y		Y
045-240-05	Y		Y		Y	Y		Y
045-240-06	Y		Y	Y	Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
045-240-07				Y	Y	Y		Y
045-240-08	Y	Y	Y	Y	Y	Y		Y
045-240-09	Y	Y	Y	Y	Y	Y		Y
045-240-10	Y	Y	Y	Y	Y	Y		Y
045-240-11	Y		Y	Y	Y	Y		Y
045-240-12		Y	Y	Y	Y	Y		Y
045-240-13	Y	Y	Y	Y	Y	Y		Y
045-240-14	Y	Y	Y		Y	Y		Y
045-240-15	Y	Y	Y		Y	Y		Y
045-240-16	Y	Y	Y		Y	Y		Y
045-240-18	Y		Y		Y	Y		Y
045-240-19	Y		Y		Y	Y		Y
045-240-20		Y	Y		Y	Y		Y
045-240-21	Y		Y		Y	Y		Y
045-240-22	Y	Y	Y		Y	Y		Y
045-240-44			Y		Y	Y		Y
045-250-03	Y	Y	Y		Y	Y		Y
045-250-04	Y	Y	Y		Y	Y		Y
045-250-05	Y	Y	Y		Y	Y		Y
045-250-06					Y	Y		Y
045-250-09	Y	Y	Y		Y	Y		Y
045-250-10	Y	Y	Y		Y	Y		Y
045-250-11	Y	Y	Y		Y	Y		Y
045-250-12	Y				Y	Y		Y
045-250-17	Y				Y	Y		Y
045-250-18		Y	Y		Y	Y		Y
045-250-19	Y		Y		Y	Y		Y
045-250-20		Y	Y	Y	Y	Y		Y
045-250-21		Y		Y	Y	Y	Y	Y
045-250-22		Y	Y	Y	Y	Y		Y
045-250-23	Y	Y	Y		Y	Y		Y
045-250-24	Y				Y	Y		Y
045-250-27					Y	Y		Y
045-260-04		Y			Y	Y		Y
045-260-05		Y		Y	Y	Y		Y
045-270-07	Y				Y	Y		Y
045-270-08	Y				Y	Y		Y
045-270-09	Y				Y	Y		Y
045-270-10	Y				Y	Y		Y
045-270-11	Y				Y	Y		Y
045-270-12	Y				Y	Y		Y
045-270-13	Y				Y	Y		Y
045-270-14		Y	Y		Y	Y		Y
045-270-15	Y	Y	Y		Y	Y		Y
045-270-16		Y	Y		Y	Y		Y
045-270-17		Y	Y		Y	Y		Y
045-270-18	Y	Y	Y		Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
045-270-19	Y	Y	Y		Y	Y		Y
045-270-20	Y		Y		Y	Y		Y
045-280-08		Y		Y	Y	Y		Y
045-290-01		Y		Y	Y	Y		Y
045-290-02				Y	Y	Y		Y
045-290-20					Y	Y		Y
045-290-21		Y		Y	Y	Y		Y
045-290-28		Y		Y	Y	Y		Y
045-300-21		Y			Y	Y		Y
045-300-24					Y	Y		Y
045-300-30					Y	Y		Y
045-300-31					Y	Y		Y
045-300-32					Y	Y		Y
045-300-33					Y	Y		Y
045-300-34					Y	Y		Y
045-300-35					Y	Y		Y
045-300-36					Y	Y		Y
045-310-01				Y	Y	Y		Y
045-310-04				Y	Y	Y		Y
045-310-09				Y	Y	Y		Y
045-310-10				Y	Y	Y		Y
045-310-13				Y	Y	Y		Y
045-310-14				Y	Y	Y		Y
045-310-15				Y	Y	Y		Y
045-320-02		Y		Y	Y	Y		Y
045-320-03		Y	Y	Y	Y	Y		Y
045-320-04		Y		Y	Y	Y		Y
045-320-05		Y		Y	Y	Y		Y
045-320-06		Y		Y	Y	Y		Y
045-320-07				Y	Y	Y		Y
045-320-08				Y	Y	Y		Y
045-330-01				Y	Y	Y		Y
045-330-02				Y	Y	Y		Y
045-330-03				Y	Y	Y		Y
045-330-04		Y		Y	Y	Y		Y
045-330-05				Y	Y	Y		Y
045-340-12		Y		Y	Y	Y		Y
047-020-01				Y	Y	Y		Y
047-020-02		Y		Y	Y	Y		Y
047-020-07		Y		Y	Y	Y		Y
047-020-08					Y	Y		Y
047-020-09		Y	Y		Y	Y		Y
047-020-10	Y	Y	Y		Y	Y		Y
047-020-11		Y	Y		Y	Y		Y
047-020-12			Y		Y	Y		Y
047-020-13	Y	Y	Y		Y	Y		Y
047-020-14	Y		Y		Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
047-020-15		Y	Y		Y	Y		Y
047-020-16	Y		Y		Y	Y		Y
047-020-17	Y		Y		Y	Y		Y
047-020-18	Y	Y	Y		Y	Y		Y
047-020-19	Y		Y		Y	Y		Y
047-020-20		Y	Y		Y	Y		Y
047-020-21					Y	Y		Y
047-020-22					Y	Y		Y
047-020-23			Y	Y	Y	Y		Y
047-020-24	Y	Y	Y	Y	Y	Y		Y
047-020-25	Y	Y	Y	Y	Y	Y		Y
047-020-26	Y	Y	Y		Y	Y		Y
047-020-27	Y		Y		Y	Y		Y
047-020-28			Y		Y	Y		Y
047-020-30	Y	Y	Y		Y	Y		Y
047-020-32	Y	Y	Y		Y	Y		Y
047-020-34	Y	Y	Y		Y	Y		Y
047-020-36	Y	Y	Y		Y	Y		Y
047-020-38	Y		Y		Y	Y		Y
047-020-40	Y	Y	Y		Y	Y		Y
047-020-41		Y	Y		Y	Y		Y
047-020-42	Y	Y	Y		Y	Y		Y
047-020-55		Y		Y	Y	Y		Y
047-020-56		Y		Y	Y	Y		Y
047-020-57					Y	Y		Y
047-020-58					Y	Y		Y
047-020-60		Y	Y		Y	Y		Y
047-020-61		Y		Y	Y	Y		Y
047-020-62		Y	Y		Y	Y		Y
047-020-63		Y		Y	Y	Y		Y
047-020-64		Y		Y	Y	Y		Y
047-030-02		Y			Y	Y		Y
047-030-08					Y	Y		Y
047-030-11					Y	Y		Y
047-030-15					Y	Y		Y
047-030-16		Y			Y	Y		Y
047-030-17		Y		Y	Y	Y		Y
047-030-18		Y			Y	Y		Y
047-030-19					Y	Y		Y
047-030-20		Y			Y	Y		Y
047-030-21					Y	Y		Y
047-040-10		Y			Y	Y		Y
047-040-17		Y			Y	Y		Y
047-050-07			Y		Y	Y		Y
047-050-08	Y	Y	Y		Y	Y		Y
047-050-09			Y		Y	Y		Y
047-050-13		Y	Y		Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
047-050-14	Y	Y	Y		Y	Y		Y
047-050-15	Y	Y	Y		Y	Y		Y
047-050-16	Y	Y	Y		Y	Y		Y
047-050-17	Y	Y	Y		Y	Y		Y
047-060-02	Y				Y	Y		Y
047-060-03	Y	Y			Y	Y		Y
047-060-04	Y				Y	Y		Y
047-060-05	Y				Y	Y		Y
047-060-06	Y				Y	Y		Y
047-060-07	Y				Y	Y		Y
047-060-08	Y				Y	Y		Y
047-060-09	Y				Y	Y		Y
047-060-10	Y				Y	Y		Y
047-060-11	Y	Y	Y		Y	Y		Y
047-060-12		Y	Y		Y	Y		Y
047-060-13	Y		Y		Y	Y		Y
047-060-14		Y	Y		Y	Y		Y
047-060-15	Y		Y		Y	Y		Y
047-060-16		Y	Y		Y	Y		Y
047-060-17	Y	Y	Y		Y	Y		Y
047-060-18		Y	Y		Y	Y		Y
047-060-19	Y	Y	Y		Y	Y		Y
047-060-21	Y	Y	Y		Y	Y		Y
047-060-23		Y	Y		Y	Y		Y
047-060-24	Y	Y			Y	Y		Y
047-060-25	Y	Y	Y		Y	Y		Y
047-070-02	Y				Y	Y		Y
047-070-03	Y	Y			Y	Y		Y
047-070-04	Y				Y	Y		Y
047-070-05	Y				Y	Y		Y
047-070-06	Y	Y			Y	Y		Y
047-070-07	Y				Y	Y		Y
047-070-08	Y	Y			Y	Y		Y
047-070-09	Y				Y	Y		Y
047-070-10	Y				Y	Y		Y
047-070-11	Y				Y	Y		Y
047-080-01	Y	Y			Y	Y		Y
047-080-04	Y				Y	Y		Y
047-080-05	Y	Y			Y	Y		Y
047-080-07	Y				Y	Y		Y
047-080-08	Y				Y	Y		Y
047-080-09		Y			Y	Y		Y
047-080-10	Y	Y			Y	Y		Y
047-080-11	Y	Y		Y	Y	Y		Y
047-080-12	Y				Y	Y		Y
047-080-13		Y		Y	Y	Y		Y
047-080-14	Y	Y			Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
047-080-15		Y			Y	Y		Y
047-080-16					Y	Y		Y
047-080-17	Y				Y	Y		Y
047-080-18	Y	Y			Y	Y		Y
047-080-19	Y	Y			Y	Y		Y
047-080-20	Y			Y	Y	Y		Y
047-080-21	Y				Y	Y		Y
047-080-22	Y	Y			Y	Y		Y
047-080-23	Y	Y			Y	Y		Y
047-080-24	Y	Y			Y	Y		Y
047-080-25	Y	Y			Y	Y		Y
047-080-26				Y	Y	Y		Y
047-080-27	Y				Y	Y		Y
047-080-28	Y	Y		Y	Y	Y		Y
047-080-29	Y				Y	Y		Y
047-080-30	Y	Y			Y	Y		Y
047-080-31					Y	Y		Y
047-080-38	Y	Y			Y	Y		Y
047-080-39	Y				Y	Y		Y
047-080-40	Y	Y			Y	Y		Y
047-080-41	Y				Y	Y		Y
047-080-42	Y	Y			Y	Y		Y
047-080-43	Y				Y	Y		Y
047-080-44		Y			Y	Y		Y
047-080-45	Y	Y			Y	Y		Y
047-080-46					Y	Y		Y
047-090-01	Y	Y			Y	Y		Y
047-090-02	Y				Y	Y		Y
047-090-03	Y				Y	Y		Y
047-090-04	Y				Y	Y		Y
047-090-05	Y	Y			Y	Y		Y
047-090-06	Y				Y	Y		Y
047-090-07	Y				Y	Y		Y
047-090-08	Y				Y	Y		Y
047-090-09	Y	Y			Y	Y		Y
047-090-10	Y				Y	Y		Y
047-090-11	Y				Y	Y		Y
047-090-12	Y				Y	Y		Y
047-090-13	Y				Y	Y		Y
047-090-14	Y				Y	Y		Y
047-090-15	Y	Y			Y	Y		Y
047-090-16	Y				Y	Y		Y
047-090-17	Y				Y	Y		Y
047-090-18	Y				Y	Y		Y
047-090-19	Y				Y	Y		Y
047-090-20	Y				Y	Y		Y
047-090-21	Y				Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
047-090-22	Y				Y	Y		Y
047-090-23	Y				Y	Y		Y
047-090-24	Y				Y	Y		Y
047-090-26	Y	Y			Y	Y		Y
047-090-27					Y	Y		Y
047-100-01					Y	Y		Y
047-100-02	Y	Y			Y	Y		Y
047-100-03	Y				Y	Y		Y
047-100-04	Y				Y	Y		Y
047-100-05	Y				Y	Y		Y
047-100-06	Y	Y			Y	Y		Y
047-100-09	Y				Y	Y		Y
047-100-10	Y				Y	Y		Y
047-100-11		Y			Y	Y		Y
047-100-12	Y	Y			Y	Y		Y
047-100-13	Y				Y	Y		Y
047-100-14	Y	Y			Y	Y		Y
047-100-15	Y				Y	Y		Y
047-100-16	Y	Y			Y	Y		Y
047-100-17	Y	Y		Y	Y	Y		Y
047-100-18	Y	Y			Y	Y		Y
047-100-19					Y	Y		Y
047-100-20	Y	Y			Y	Y		Y
047-100-21	Y				Y	Y		Y
047-100-22	Y			Y	Y	Y		Y
047-100-23	Y	Y		Y	Y	Y		Y
047-100-24	Y	Y		Y	Y	Y		Y
047-100-25	Y	Y		Y	Y	Y		Y
047-100-26	Y			Y	Y	Y		Y
047-100-27	Y	Y		Y	Y	Y		Y
047-100-28	Y	Y		Y	Y	Y		Y
047-100-31	Y			Y	Y	Y		Y
047-100-32	Y	Y			Y	Y		Y
047-100-33		Y			Y	Y		Y
047-100-34		Y			Y	Y		Y
047-100-35		Y			Y	Y		Y
047-100-36	Y	Y		Y	Y	Y		Y
047-110-02		Y			Y	Y		Y
047-110-03		Y			Y	Y		Y
047-110-04	Y				Y	Y		Y
047-110-05	Y				Y	Y		Y
047-110-06	Y				Y	Y		Y
047-110-07	Y				Y	Y		Y
047-110-08	Y				Y	Y		Y
047-110-09	Y				Y	Y		Y
047-110-10	Y				Y	Y		Y
047-110-11	Y	Y			Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
047-110-12	Y				Y	Y		Y
047-110-13	Y				Y	Y		Y
047-110-14	Y				Y	Y		Y
047-110-15	Y				Y	Y		Y
047-110-16	Y				Y	Y		Y
047-110-17	Y				Y	Y		Y
047-110-18	Y				Y	Y		Y
047-110-19	Y				Y	Y		Y
047-110-21	Y	Y			Y	Y		Y
047-110-22	Y	Y			Y	Y		Y
047-120-03	Y				Y	Y		Y
047-120-06		Y			Y	Y		Y
047-120-07	Y				Y	Y		Y
047-120-08	Y	Y		Y	Y	Y		Y
047-120-09	Y				Y	Y		Y
047-120-10	Y	Y			Y	Y		Y
047-120-11	Y	Y			Y	Y		Y
047-120-12	Y				Y	Y		Y
047-120-13	Y				Y	Y		Y
047-120-14		Y			Y	Y		Y
047-120-15	Y				Y	Y		Y
047-120-16	Y	Y			Y	Y		Y
047-120-17	Y				Y	Y		Y
047-120-18	Y				Y	Y		Y
047-120-19	Y				Y	Y		Y
047-120-20	Y	Y			Y	Y		Y
047-120-21	Y	Y			Y	Y		Y
047-120-22	Y				Y	Y		Y
047-120-23	Y	Y			Y	Y		Y
047-120-24	Y	Y			Y	Y		Y
047-120-25	Y				Y	Y		Y
047-120-26	Y	Y			Y	Y		Y
047-120-27	Y				Y	Y		Y
047-120-28	Y				Y	Y		Y
047-120-29	Y	Y			Y	Y		Y
047-120-30	Y	Y			Y	Y		Y
047-120-31	Y	Y			Y	Y		Y
047-120-32	Y				Y	Y		Y
047-120-33	Y				Y	Y		Y
047-120-34	Y				Y	Y		Y
047-120-35	Y	Y			Y	Y		Y
047-120-36	Y				Y	Y		Y
047-120-37	Y	Y			Y	Y		Y
047-120-38	Y			Y	Y	Y		Y
047-120-39	Y			Y	Y	Y		Y
047-120-40	Y			Y	Y	Y		Y
047-120-45	Y	Y			Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
047-120-46	Y	Y			Y	Y		Y
047-120-48	Y				Y	Y		Y
047-120-49	Y				Y	Y		Y
047-120-50	Y	Y			Y	Y		Y
047-120-51	Y				Y	Y		Y
047-120-52	Y	Y			Y	Y		Y
047-120-53		Y		Y	Y	Y		Y
047-130-02	Y				Y	Y		Y
047-130-03	Y				Y	Y		Y
047-130-04	Y	Y			Y	Y		Y
047-130-05	Y				Y	Y		Y
047-130-06	Y	Y			Y	Y		Y
047-130-08	Y				Y	Y		Y
047-130-09	Y				Y	Y		Y
047-130-10	Y				Y	Y		Y
047-130-11	Y				Y	Y		Y
047-130-12	Y				Y	Y		Y
047-130-13	Y				Y	Y		Y
047-130-14	Y	Y			Y	Y		Y
047-130-17	Y	Y			Y	Y		Y
047-130-18	Y				Y	Y		Y
047-130-19	Y	Y			Y	Y		Y
047-130-20	Y				Y	Y		Y
047-130-21	Y	Y			Y	Y		Y
047-130-25	Y				Y	Y		Y
047-130-26	Y				Y	Y		Y
047-130-27	Y	Y			Y	Y		Y
047-130-28	Y	Y			Y	Y		Y
047-130-29	Y	Y			Y	Y		Y
047-130-30	Y				Y	Y		Y
047-130-32	Y	Y			Y	Y		Y
047-130-33					Y	Y		Y
047-140-02	Y	Y			Y	Y		Y
047-140-03		Y		Y	Y	Y		Y
047-140-04	Y				Y	Y		Y
047-140-05	Y				Y	Y		Y
047-140-06	Y				Y	Y		Y
047-140-07	Y	Y		Y	Y	Y		Y
047-140-08	Y	Y			Y	Y		Y
047-140-09	Y	Y			Y	Y		Y
047-140-10	Y	Y			Y	Y		Y
047-140-11		Y			Y	Y		Y
047-140-12	Y	Y			Y	Y		Y
047-140-13	Y				Y	Y		Y
047-140-14	Y			Y	Y	Y		Y
047-140-15	Y				Y	Y		Y
047-140-16		Y		Y	Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
047-140-17	Y	Y			Y	Y		Y
047-140-20	Y			Y	Y	Y		Y
047-140-21	Y				Y	Y		Y
047-140-22	Y	Y		Y	Y	Y		Y
047-140-23		Y			Y	Y		Y
047-140-24	Y	Y			Y	Y		Y
047-140-25	Y				Y	Y		Y
047-140-26	Y	Y			Y	Y		Y
047-140-27	Y				Y	Y		Y
047-140-28					Y	Y		Y
047-140-29	Y				Y	Y		Y
047-140-30					Y	Y		Y
047-140-31	Y	Y			Y	Y		Y
047-140-32	Y				Y	Y		Y
047-140-33	Y	Y			Y	Y		Y
047-140-34	Y	Y	Y		Y	Y		Y
047-140-35	Y	Y	Y		Y	Y		Y
047-140-36	Y	Y			Y	Y		Y
047-140-37	Y				Y	Y		Y
047-140-38	Y	Y			Y	Y		Y
047-140-39	Y				Y	Y		Y
047-140-40	Y				Y	Y		Y
047-140-41	Y			Y	Y	Y		Y
047-140-42	Y	Y			Y	Y		Y
047-140-43	Y	Y			Y	Y		Y
047-140-44					Y	Y		Y
047-140-45	Y	Y			Y	Y		Y
047-140-46		Y			Y	Y		Y
047-140-48	Y				Y	Y		Y
047-140-49		Y	Y		Y	Y		Y
047-140-51	Y	Y			Y	Y		Y
047-140-52	Y				Y	Y		Y
047-150-01	Y				Y	Y		Y
047-150-02					Y	Y		Y
047-150-03	Y	Y			Y	Y		Y
047-150-04	Y	Y			Y	Y		Y
047-150-05	Y	Y			Y	Y		Y
047-150-06	Y	Y			Y	Y		Y
047-150-07	Y	Y		Y	Y	Y		Y
047-150-08	Y				Y	Y		Y
047-150-09	Y	Y		Y	Y	Y		Y
047-150-10	Y				Y	Y		Y
047-150-11	Y	Y			Y	Y		Y
047-150-12	Y			Y	Y	Y		Y
047-150-13	Y	Y			Y	Y		Y
047-150-14	Y	Y			Y	Y		Y
047-161-02	Y	Y			Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
047-161-03	Y				Y	Y		Y
047-161-04	Y				Y	Y		Y
047-161-05	Y	Y			Y	Y		Y
047-161-08	Y	Y		Y	Y	Y		Y
047-161-09		Y			Y	Y		Y
047-161-10		Y			Y	Y		Y
047-161-11		Y			Y	Y		Y
047-161-12		Y			Y	Y		Y
047-161-13	Y	Y			Y	Y		Y
047-161-14	Y				Y	Y		Y
047-161-15	Y	Y			Y	Y		Y
047-161-16		Y			Y	Y		Y
047-161-17	Y				Y	Y		Y
047-161-18		Y			Y	Y		Y
047-161-19	Y				Y	Y		Y
047-161-20	Y	Y			Y	Y		Y
047-161-21		Y			Y	Y		Y
047-161-22	Y	Y		Y	Y	Y		Y
047-161-23	Y			Y	Y	Y		Y
047-161-24	Y	Y			Y	Y		Y
047-161-25					Y	Y		Y
047-161-26	Y	Y			Y	Y		Y
047-161-27					Y	Y		Y
047-161-29	Y				Y	Y		Y
047-161-30		Y		Y	Y	Y		Y
047-161-31	Y	Y			Y	Y		Y
047-161-32	Y	Y			Y	Y		Y
047-162-01	Y				Y	Y		Y
047-162-03	Y	Y			Y	Y		Y
047-162-04	Y	Y			Y	Y		Y
047-162-05	Y	Y			Y	Y		Y
047-162-06					Y	Y		Y
047-162-07	Y	Y			Y	Y		Y
047-162-08	Y	Y			Y	Y		Y
047-162-09	Y				Y	Y		Y
047-162-10	Y				Y	Y		Y
047-162-12	Y	Y			Y	Y		Y
047-162-13		Y			Y	Y		Y
047-162-14	Y				Y	Y		Y
047-163-01	Y			Y	Y	Y		Y
047-163-02	Y			Y	Y	Y		Y
047-163-03	Y	Y		Y	Y	Y		Y
047-163-04	Y				Y	Y		Y
047-163-05	Y	Y			Y	Y		Y
047-163-06	Y				Y	Y		Y
047-163-07	Y	Y			Y	Y		Y
047-163-08	Y				Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
047-163-09		Y			Y	Y		Y
047-163-11	Y				Y	Y		Y
047-163-12	Y				Y	Y		Y
047-163-13	Y				Y	Y		Y
047-163-14	Y	Y			Y	Y		Y
047-163-15	Y				Y	Y		Y
047-163-17	Y	Y			Y	Y		Y
047-163-18		Y			Y	Y		Y
047-163-20	Y	Y			Y	Y		Y
047-163-21		Y			Y	Y		Y
047-163-22					Y	Y		Y
047-163-23	Y	Y			Y	Y		Y
047-163-24					Y	Y		Y
047-163-25		Y			Y	Y		Y
047-163-26	Y			Y	Y	Y		Y
047-163-27	Y			Y	Y	Y		Y
047-170-01	Y			Y	Y	Y		Y
047-170-02	Y	Y			Y	Y		Y
047-170-03		Y			Y	Y		Y
047-170-04	Y				Y	Y		Y
047-170-05	Y	Y			Y	Y		Y
047-170-06				Y	Y	Y		Y
047-170-07	Y				Y	Y		Y
047-170-08	Y	Y			Y	Y		Y
047-170-09	Y	Y			Y	Y		Y
047-170-10	Y	Y		Y	Y	Y		Y
047-170-11		Y			Y	Y		Y
047-170-12	Y	Y			Y	Y		Y
047-170-13	Y	Y			Y	Y		Y
047-170-14	Y				Y	Y		Y
047-170-15					Y	Y		Y
047-170-16	Y	Y		Y	Y	Y		Y
047-170-18	Y	Y			Y	Y		Y
047-170-19		Y			Y	Y		Y
047-170-20	Y	Y		Y	Y	Y		Y
047-170-21	Y	Y			Y	Y		Y
047-170-22	Y	Y			Y	Y		Y
047-170-23	Y				Y	Y		Y
047-170-24	Y	Y			Y	Y		Y
047-170-25					Y	Y		Y
047-170-26	Y				Y	Y		Y
047-170-27		Y			Y	Y		Y
047-170-28	Y				Y	Y		Y
047-170-30		Y		Y	Y	Y		Y
047-170-31	Y	Y			Y	Y		Y
047-170-32	Y				Y	Y		Y
047-170-33	Y				Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
047-180-01	Y				Y	Y		Y
047-180-02	Y				Y	Y		Y
047-180-03	Y	Y		Y	Y	Y		Y
047-180-04	Y				Y	Y		Y
047-180-05		Y		Y	Y	Y		Y
047-180-06		Y			Y	Y		Y
047-180-07	Y				Y	Y		Y
047-180-08	Y	Y		Y	Y	Y		Y
047-180-09	Y	Y			Y	Y		Y
047-180-10	Y	Y		Y	Y	Y		Y
047-180-11	Y	Y			Y	Y		Y
047-180-12	Y	Y			Y	Y		Y
047-180-13	Y			Y	Y	Y		Y
047-180-14	Y				Y	Y		Y
047-180-15					Y	Y		Y
047-180-16	Y	Y		Y	Y	Y		Y
047-180-17	Y	Y			Y	Y		Y
047-180-18	Y			Y	Y	Y		Y
047-180-19	Y	Y			Y	Y		Y
047-191-01		Y	Y		Y	Y		Y
047-191-02		Y	Y		Y	Y		Y
047-191-03			Y		Y	Y		Y
047-191-06	Y	Y	Y		Y	Y		Y
047-191-07	Y		Y		Y	Y		Y
047-191-08		Y	Y		Y	Y		Y
047-191-11	Y		Y		Y	Y		Y
047-191-12	Y		Y		Y	Y	Y	Y
047-191-13	Y		Y		Y	Y		Y
047-191-14	Y	Y	Y	Y	Y	Y		Y
047-191-15	Y	Y			Y	Y		Y
047-191-16	Y		Y	Y	Y	Y		Y
047-191-17	Y				Y	Y		Y
047-191-18		Y	Y		Y	Y		Y
047-191-19	Y	Y	Y		Y	Y		Y
047-191-20	Y		Y		Y	Y		Y
047-191-21	Y		Y		Y	Y		Y
047-191-22	Y		Y		Y	Y		Y
047-191-23	Y		Y		Y	Y		Y
047-191-24	Y		Y	Y	Y	Y		Y
047-191-25	Y	Y			Y	Y		Y
047-191-26	Y		Y		Y	Y		Y
047-191-27	Y	Y	Y		Y	Y		Y
047-191-28		Y	Y		Y	Y		Y
047-191-29					Y	Y		Y
047-192-01	Y				Y	Y		Y
047-192-02	Y	Y		Y	Y	Y		Y
047-192-03	Y				Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
047-192-04	Y	Y		Y	Y	Y		Y
047-192-05	Y				Y	Y		Y
047-192-06	Y				Y	Y		Y
047-192-07					Y	Y		Y
047-192-08	Y	Y			Y	Y		Y
047-192-09	Y	Y		Y	Y	Y		Y
047-192-10	Y				Y	Y		Y
047-192-11	Y	Y		Y	Y	Y		Y
047-192-14					Y	Y		Y
047-192-15		Y			Y	Y		Y
047-192-16	Y				Y	Y		Y
047-192-17	Y	Y			Y	Y		Y
047-192-18	Y	Y			Y	Y		Y
047-192-19	Y				Y	Y		Y
047-192-20	Y	Y		Y	Y	Y		Y
047-192-21	Y				Y	Y		Y
047-192-22	Y	Y		Y	Y	Y		Y
047-192-23	Y	Y			Y	Y		Y
047-192-24	Y	Y		Y	Y	Y		Y
047-192-25	Y	Y			Y	Y		Y
047-192-26	Y	Y			Y	Y		Y
047-192-27	Y	Y			Y	Y		Y
047-192-28	Y	Y		Y	Y	Y		Y
047-192-29	Y	Y			Y	Y		Y
047-192-30		Y		Y	Y	Y		Y
047-192-31	Y				Y	Y		Y
047-192-32	Y	Y			Y	Y		Y
047-192-33	Y			Y	Y	Y		Y
047-192-34	Y	Y			Y	Y		Y
047-192-35	Y	Y			Y	Y		Y
047-192-36		Y			Y	Y		Y
047-192-37		Y			Y	Y		Y
047-192-38	Y				Y	Y		Y
047-192-39	Y				Y	Y		Y
047-193-01	Y	Y	Y		Y	Y		Y
047-193-02	Y	Y	Y		Y	Y		Y
047-193-03	Y	Y	Y		Y	Y		Y
047-193-04			Y		Y	Y		Y
047-193-05		Y	Y		Y	Y		Y
047-193-06		Y	Y		Y	Y		Y
047-193-07	Y	Y	Y		Y	Y		Y
047-193-08	Y	Y	Y		Y	Y		Y
047-193-09	Y	Y	Y	Y	Y	Y		Y
047-193-10		Y	Y		Y	Y		Y
047-193-11	Y	Y	Y		Y	Y	Y	Y
047-193-13			Y		Y	Y		Y
047-193-14		Y	Y		Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
047-193-15		Y	Y		Y	Y	Y	Y
047-193-16			Y		Y	Y		Y
047-193-17			Y		Y	Y		Y
047-193-18	Y				Y	Y		Y
047-193-19		Y	Y	Y	Y	Y		Y
047-193-20	Y	Y			Y	Y		Y
047-193-21	Y		Y	Y	Y	Y		Y
047-193-22	Y				Y	Y		Y
047-193-23	Y		Y	Y	Y	Y		Y
047-193-24	Y	Y			Y	Y		Y
047-193-25	Y		Y		Y	Y		Y
047-193-26	Y	Y	Y		Y	Y		Y
047-193-27	Y				Y	Y		Y
047-193-28	Y	Y			Y	Y		Y
047-193-29	Y	Y		Y	Y	Y		Y
047-193-30	Y	Y		Y	Y	Y		Y
047-194-01		Y			Y	Y		Y
047-194-02		Y			Y	Y		Y
047-194-03	Y				Y	Y		Y
047-194-04	Y				Y	Y		Y
047-194-05				Y	Y	Y		Y
047-194-06	Y	Y			Y	Y		Y
047-194-07		Y			Y	Y		Y
047-194-08	Y				Y	Y		Y
047-194-09	Y	Y			Y	Y		Y
047-194-10		Y	Y		Y	Y		Y
047-194-12	Y		Y		Y	Y		Y
047-194-13		Y	Y		Y	Y		Y
047-194-14	Y		Y		Y	Y		Y
047-194-15	Y	Y	Y		Y	Y		Y
047-194-16				Y	Y	Y		Y
047-194-17	Y	Y			Y	Y		Y
047-194-18					Y	Y		Y
047-194-19	Y	Y			Y	Y		Y
047-194-20	Y				Y	Y		Y
047-194-21	Y				Y	Y		Y
047-194-22		Y			Y	Y		Y
047-194-23	Y				Y	Y		Y
047-194-24	Y	Y			Y	Y		Y
047-194-25	Y	Y		Y	Y	Y		Y
047-194-26	Y	Y			Y	Y		Y
047-194-27	Y		Y	Y	Y	Y		Y
047-194-28			Y	Y	Y	Y		Y
047-200-01	Y	Y			Y	Y		Y
047-200-02	Y	Y			Y	Y		Y
047-200-03		Y			Y	Y		Y
047-200-04	Y	Y		Y	Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
047-200-05	Y			Y	Y	Y		Y
047-200-06	Y				Y	Y		Y
047-200-07	Y	Y		Y	Y	Y		Y
047-200-08					Y	Y		Y
047-200-09	Y	Y			Y	Y		Y
047-200-10	Y				Y	Y		Y
047-200-11	Y	Y			Y	Y		Y
047-200-12		Y			Y	Y		Y
047-200-13	Y	Y		Y	Y	Y		Y
047-200-14	Y	Y		Y	Y	Y		Y
047-200-15	Y			Y	Y	Y		Y
047-200-16	Y				Y	Y		Y
047-200-17	Y				Y	Y		Y
047-200-18		Y			Y	Y		Y
047-210-01	Y			Y	Y	Y		Y
047-210-02	Y	Y			Y	Y		Y
047-210-03	Y				Y	Y		Y
047-210-04	Y	Y			Y	Y		Y
047-210-05		Y			Y	Y		Y
047-210-06	Y				Y	Y		Y
047-210-07	Y	Y			Y	Y		Y
047-210-08	Y				Y	Y		Y
047-210-09	Y	Y		Y	Y	Y		Y
047-210-10	Y		Y	Y	Y	Y		Y
047-210-11	Y		Y	Y	Y	Y		Y
047-210-12		Y	Y		Y	Y		Y
047-210-13		Y	Y		Y	Y		Y
047-210-14	Y		Y		Y	Y		Y
047-210-15	Y	Y	Y		Y	Y		Y
047-210-16	Y	Y	Y	Y	Y	Y		Y
047-210-17	Y		Y		Y	Y		Y
047-210-18	Y	Y	Y		Y	Y		Y
047-210-19	Y	Y			Y	Y		Y
047-210-20					Y	Y		Y
047-210-21	Y	Y		Y	Y	Y		Y
047-210-22	Y	Y			Y	Y		Y
047-210-23		Y			Y	Y		Y
047-210-24					Y	Y		Y
047-210-25	Y	Y		Y	Y	Y		Y
047-210-26				Y	Y	Y		Y
047-210-27	Y			Y	Y	Y		Y
047-220-01	Y	Y			Y	Y		Y
047-220-02	Y				Y	Y		Y
047-220-03	Y	Y			Y	Y		Y
047-220-05		Y			Y	Y		Y
047-220-06	Y	Y			Y	Y		Y
047-220-07	Y	Y			Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
047-220-09	Y	Y			Y	Y		Y
047-220-10	Y				Y	Y		Y
047-220-15	Y				Y	Y		Y
047-220-16	Y				Y	Y		Y
047-220-17	Y				Y	Y		Y
047-220-18	Y				Y	Y		Y
047-220-19	Y				Y	Y		Y
047-220-20	Y	Y			Y	Y		Y
047-220-21					Y	Y		Y
047-220-22	Y	Y		Y	Y	Y		Y
047-220-23	Y				Y	Y		Y
047-220-25		Y			Y	Y		Y
047-220-27					Y	Y		Y
047-220-28	Y				Y	Y		Y
047-220-29	Y				Y	Y		Y
047-230-04	Y				Y	Y		Y
047-230-05	Y				Y	Y		Y
047-230-06	Y			Y	Y	Y		Y
047-230-07					Y	Y		Y
047-230-10	Y				Y	Y		Y
047-230-11	Y				Y	Y		Y
047-230-12	Y				Y	Y		Y
047-240-01	Y				Y	Y		Y
047-240-02	Y				Y	Y		Y
047-240-03	Y				Y	Y		Y
047-240-04	Y				Y	Y		Y
047-240-05	Y				Y	Y		Y
047-240-06	Y				Y	Y		Y
047-240-07	Y				Y	Y		Y
047-240-08	Y				Y	Y		Y
047-240-09	Y				Y	Y		Y
047-240-10	Y				Y	Y		Y
047-240-11	Y				Y	Y		Y
047-240-12	Y				Y	Y		Y
047-240-13	Y	Y			Y	Y		Y
047-240-14	Y				Y	Y		Y
047-240-15	Y				Y	Y		Y
047-240-16	Y				Y	Y		Y
047-240-17	Y				Y	Y		Y
047-240-18	Y	Y			Y	Y		Y
047-240-19					Y	Y		Y
047-240-20	Y				Y	Y		Y
047-240-21	Y				Y	Y		Y
047-240-22	Y				Y	Y		Y
047-250-01	Y	Y			Y	Y		Y
047-250-02	Y				Y	Y		Y
047-250-03	Y				Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
047-250-04		Y			Y	Y		Y
047-250-05	Y				Y	Y		Y
047-250-06	Y				Y	Y		Y
047-250-07	Y				Y	Y		Y
047-250-08	Y	Y			Y	Y		Y
047-250-09	Y	Y			Y	Y		Y
047-250-10	Y	Y			Y	Y		Y
047-250-11	Y				Y	Y		Y
047-250-12	Y				Y	Y		Y
047-250-13		Y			Y	Y		Y
047-250-14	Y				Y	Y		Y
047-250-15	Y				Y	Y		Y
047-250-16	Y	Y			Y	Y		Y
047-250-17	Y	Y			Y	Y		Y
047-250-18	Y	Y			Y	Y		Y
047-250-19	Y				Y	Y		Y
047-250-20		Y			Y	Y		Y
047-250-21	Y	Y			Y	Y		Y
047-250-22	Y	Y			Y	Y		Y
047-250-23	Y				Y	Y		Y
047-250-24	Y			Y	Y	Y		Y
047-250-25	Y			Y	Y	Y		Y
047-260-01	Y			Y	Y	Y		Y
047-260-03	Y				Y	Y		Y
047-260-04	Y			Y	Y	Y		Y
047-260-05	Y	Y			Y	Y		Y
047-260-06	Y	Y		Y	Y	Y		Y
047-260-07	Y				Y	Y		Y
047-260-08	Y				Y	Y		Y
047-260-09	Y	Y			Y	Y		Y
047-260-10	Y	Y			Y	Y		Y
047-260-11	Y	Y			Y	Y		Y
047-260-13	Y	Y			Y	Y		Y
047-260-14	Y	Y			Y	Y		Y
047-260-16	Y	Y			Y	Y		Y
047-260-19		Y			Y	Y		Y
047-260-20	Y			Y	Y	Y		Y
047-260-21	Y				Y	Y		Y
047-260-22	Y				Y	Y		Y
047-260-23	Y				Y	Y		Y
047-260-24	Y	Y			Y	Y		Y
047-260-25	Y	Y		Y	Y	Y		Y
047-260-27				Y	Y	Y		Y
047-260-28	Y	Y			Y	Y		Y
047-260-29	Y	Y			Y	Y		Y
047-260-30	Y				Y	Y		Y
047-260-31	Y	Y			Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
047-260-32	Y	Y			Y	Y		Y
047-260-33		Y			Y	Y		Y
047-260-34		Y			Y	Y		Y
047-260-35	Y				Y	Y		Y
047-270-05	Y	Y		Y	Y	Y		Y
047-270-06	Y	Y		Y	Y	Y		Y
047-270-07	Y			Y	Y	Y		Y
047-270-10		Y		Y	Y	Y		Y
047-270-11	Y	Y			Y	Y		Y
047-270-12	Y	Y			Y	Y		Y
047-270-13		Y			Y	Y	Y	Y
047-270-14					Y	Y		Y
047-270-15					Y	Y		Y
047-270-16					Y	Y		Y
047-270-17					Y	Y		Y
047-270-18					Y	Y		Y
047-270-19	Y	Y		Y	Y	Y		Y
047-270-20	Y	Y	Y		Y	Y		Y
047-270-21	Y				Y	Y		Y
047-270-22	Y	Y			Y	Y		Y
047-270-24	Y	Y			Y	Y		Y
047-270-25					Y	Y		Y
047-270-26		Y			Y	Y		Y
047-270-28		Y			Y	Y		Y
047-270-29		Y		Y	Y	Y		Y
047-270-30					Y	Y		Y
047-270-31					Y	Y		Y
047-270-32	Y			Y	Y	Y		Y
047-270-33	Y	Y		Y	Y	Y		Y
047-280-01					Y	Y		Y
047-280-05		Y			Y	Y		Y
047-280-06					Y	Y		Y
047-280-11					Y	Y		Y
047-280-12					Y	Y		Y
047-280-13					Y	Y		Y
047-280-14					Y	Y		Y
047-280-15					Y	Y		Y
047-280-21					Y	Y		Y
047-280-22					Y	Y		Y
047-290-01	Y				Y	Y		Y
047-290-02	Y	Y		Y	Y	Y		Y
047-290-03	Y	Y			Y	Y		Y
047-290-04	Y				Y	Y		Y
047-290-05		Y			Y	Y		Y
047-290-06		Y			Y	Y		Y
047-290-07	Y	Y		Y	Y	Y		Y
047-290-08	Y	Y		Y	Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
047-290-09	Y	Y			Y	Y		Y
047-290-10		Y			Y	Y		Y
047-290-11		Y			Y	Y		Y
047-290-12	Y	Y			Y	Y		Y
047-290-13	Y	Y			Y	Y		Y
047-290-14		Y			Y	Y		Y
047-290-15	Y				Y	Y		Y
047-290-16	Y	Y			Y	Y		Y
047-290-17		Y			Y	Y		Y
047-290-18	Y	Y			Y	Y		Y
047-290-19	Y			Y	Y	Y		Y
047-290-20	Y			Y	Y	Y		Y
047-290-21	Y			Y	Y	Y		Y
047-290-22	Y	Y		Y	Y	Y		Y
047-290-23				Y	Y	Y		Y
047-290-24	Y				Y	Y		Y
047-290-25	Y			Y	Y	Y		Y
047-300-01	Y	Y			Y	Y		Y
047-300-02	Y			Y	Y	Y		Y
047-300-03	Y				Y	Y		Y
047-300-04	Y				Y	Y		Y
047-300-05	Y				Y	Y		Y
047-300-06	Y				Y	Y		Y
047-300-07	Y				Y	Y		Y
047-300-08					Y	Y		Y
047-300-09	Y				Y	Y		Y
047-300-10	Y	Y			Y	Y		Y
047-300-11	Y				Y	Y		Y
047-300-12		Y			Y	Y		Y
047-300-13	Y	Y			Y	Y		Y
047-300-14	Y	Y			Y	Y		Y
047-300-15	Y				Y	Y		Y
047-300-16	Y				Y	Y		Y
047-300-17	Y				Y	Y		Y
047-300-18	Y	Y			Y	Y		Y
047-300-19	Y	Y			Y	Y		Y
047-300-20	Y	Y			Y	Y		Y
047-300-21	Y				Y	Y		Y
047-300-22	Y				Y	Y		Y
047-300-23	Y			Y	Y	Y		Y
047-300-24	Y				Y	Y		Y
047-300-25	Y	Y			Y	Y		Y
047-300-26	Y				Y	Y		Y
047-300-27	Y				Y	Y		Y
047-300-28	Y				Y	Y		Y
047-300-29	Y				Y	Y		Y
047-300-30	Y				Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
047-300-31	Y				Y	Y		Y
047-300-32	Y	Y			Y	Y		Y
047-300-33	Y				Y	Y		Y
047-300-34					Y	Y		Y
047-300-35	Y				Y	Y		Y
047-300-36	Y				Y	Y		Y
047-300-37	Y	Y			Y	Y		Y
047-300-38					Y	Y		Y
047-300-39	Y				Y	Y		Y
047-300-40	Y				Y	Y		Y
047-300-41	Y	Y		Y	Y	Y		Y
047-300-42	Y			Y	Y	Y		Y
047-300-43	Y				Y	Y		Y
047-300-44		Y			Y	Y		Y
047-300-46	Y	Y			Y	Y		Y
047-300-47	Y	Y			Y	Y		Y
047-300-48	Y	Y			Y	Y		Y
047-300-49	Y			Y	Y	Y		Y
047-300-50		Y			Y	Y		Y
047-300-51		Y			Y	Y		Y
047-300-52	Y				Y	Y		Y
047-300-53	Y	Y			Y	Y		Y
047-300-55	Y				Y	Y		Y
047-300-56	Y			Y	Y	Y		Y
047-300-57					Y	Y		Y
047-300-58				Y	Y	Y		Y
047-300-59				Y	Y	Y		Y
047-300-60				Y	Y	Y		Y
047-300-61					Y	Y		Y
047-300-62					Y	Y		Y
047-300-63		Y			Y	Y		Y
047-300-64					Y	Y		Y
047-300-65					Y	Y		Y
047-300-67					Y	Y		Y
047-300-68					Y	Y		Y
047-300-69				Y	Y	Y		Y
047-300-70				Y	Y	Y		Y
047-300-71				Y	Y	Y		Y
047-300-72				Y	Y	Y		Y
047-300-73				Y	Y	Y		Y
047-300-74				Y	Y	Y		Y
047-300-75				Y	Y	Y		Y
047-300-76				Y	Y	Y		Y
047-311-01	Y				Y	Y		Y
047-311-02	Y			Y	Y	Y		Y
047-311-03	Y	Y		Y	Y	Y		Y
047-311-04	Y				Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
047-311-05	Y	Y			Y	Y		Y
047-311-06	Y				Y	Y		Y
047-311-07	Y				Y	Y		Y
047-311-08	Y				Y	Y		Y
047-311-09	Y				Y	Y		Y
047-311-10	Y				Y	Y		Y
047-311-12	Y				Y	Y		Y
047-311-13	Y	Y			Y	Y	Y	Y
047-311-14	Y				Y	Y		Y
047-311-15	Y	Y			Y	Y		Y
047-311-16	Y			Y	Y	Y		Y
047-311-17	Y	Y			Y	Y		Y
047-311-18	Y	Y			Y	Y		Y
047-311-19	Y				Y	Y		Y
047-311-20	Y	Y			Y	Y		Y
047-311-21	Y				Y	Y		Y
047-311-22	Y	Y		Y	Y	Y		Y
047-311-23	Y	Y		Y	Y	Y		Y
047-311-24		Y			Y	Y		Y
047-311-25		Y			Y	Y		Y
047-311-26	Y				Y	Y		Y
047-311-27		Y			Y	Y		Y
047-312-01		Y	Y	Y	Y	Y		Y
047-312-02	Y	Y	Y		Y	Y		Y
047-312-03		Y			Y	Y		Y
047-312-04	Y	Y			Y	Y		Y
047-312-05	Y	Y			Y	Y		Y
047-312-06	Y	Y			Y	Y		Y
047-312-07	Y				Y	Y		Y
047-312-08	Y				Y	Y		Y
047-312-09	Y				Y	Y		Y
047-312-10	Y	Y			Y	Y		Y
047-312-11	Y				Y	Y		Y
047-312-12	Y	Y			Y	Y		Y
047-312-13	Y				Y	Y		Y
047-312-14	Y				Y	Y		Y
047-312-15	Y				Y	Y		Y
047-312-16	Y	Y			Y	Y		Y
047-312-17	Y	Y			Y	Y		Y
047-312-18	Y	Y			Y	Y		Y
047-312-19	Y	Y			Y	Y		Y
047-312-20					Y	Y		Y
047-312-21	Y				Y	Y		Y
047-312-22	Y				Y	Y		Y
047-312-23	Y		Y		Y	Y		Y
047-312-24		Y	Y		Y	Y		Y
047-312-25		Y	Y		Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
047-312-26	Y		Y		Y	Y		Y
047-313-01	Y	Y			Y	Y		Y
047-313-02		Y	Y		Y	Y		Y
047-313-03		Y	Y		Y	Y		Y
047-314-01	Y	Y			Y	Y		Y
047-314-02		Y	Y		Y	Y		Y
047-314-03		Y	Y		Y	Y		Y
047-314-04	Y				Y	Y		Y
047-314-05	Y				Y	Y		Y
047-314-06	Y				Y	Y		Y
047-314-07	Y				Y	Y		Y
047-314-08	Y	Y			Y	Y		Y
047-321-01	Y	Y			Y	Y		Y
047-321-02	Y	Y			Y	Y		Y
047-321-03	Y				Y	Y		Y
047-321-04	Y				Y	Y		Y
047-321-05	Y				Y	Y		Y
047-321-06	Y				Y	Y		Y
047-321-07	Y				Y	Y		Y
047-321-08		Y			Y	Y		Y
047-321-09	Y				Y	Y		Y
047-321-10		Y			Y	Y		Y
047-321-11	Y	Y			Y	Y		Y
047-321-12	Y	Y			Y	Y		Y
047-321-13	Y	Y		Y	Y	Y		Y
047-321-14	Y	Y			Y	Y		Y
047-321-15	Y	Y			Y	Y		Y
047-321-16	Y	Y			Y	Y		Y
047-321-17	Y	Y			Y	Y		Y
047-321-18	Y				Y	Y		Y
047-321-19	Y	Y			Y	Y		Y
047-321-21	Y	Y		Y	Y	Y		Y
047-321-23	Y	Y			Y	Y		Y
047-321-24	Y	Y		Y	Y	Y		Y
047-322-01		Y	Y		Y	Y		Y
047-322-02	Y		Y		Y	Y		Y
047-322-03	Y		Y		Y	Y		Y
047-322-04	Y				Y	Y		Y
047-322-05	Y				Y	Y		Y
047-322-06	Y				Y	Y		Y
047-322-07	Y	Y			Y	Y		Y
047-322-08	Y				Y	Y		Y
047-322-09	Y				Y	Y		Y
047-322-10	Y	Y			Y	Y		Y
047-322-11		Y			Y	Y		Y
047-322-12	Y			Y	Y	Y		Y
047-322-13	Y			Y	Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
047-322-14	Y			Y	Y	Y		Y
047-322-15				Y	Y	Y		Y
047-322-16	Y	Y			Y	Y		Y
047-322-17	Y				Y	Y		Y
047-322-18					Y	Y		Y
047-322-19	Y				Y	Y		Y
047-322-20	Y	Y			Y	Y		Y
047-322-21	Y	Y			Y	Y		Y
047-322-22	Y				Y	Y		Y
047-322-23	Y	Y			Y	Y		Y
047-322-24	Y	Y		Y	Y	Y		Y
047-322-25	Y	Y			Y	Y		Y
047-322-26		Y			Y	Y		Y
047-322-27	Y				Y	Y		Y
047-322-28	Y	Y		Y	Y	Y		Y
047-322-29	Y			Y	Y	Y		Y
047-323-01	Y				Y	Y		Y
047-323-05		Y			Y	Y		Y
047-323-06	Y	Y			Y	Y		Y
047-323-07	Y			Y	Y	Y		Y
047-323-08	Y	Y			Y	Y		Y
047-323-09	Y			Y	Y	Y		Y
047-323-11		Y		Y	Y	Y		Y
047-323-12	Y	Y		Y	Y	Y		Y
047-324-02	Y				Y	Y		Y
047-324-03	Y	Y			Y	Y		Y
047-324-04	Y				Y	Y		Y
047-324-05	Y	Y			Y	Y		Y
047-324-06	Y				Y	Y		Y
047-324-10					Y	Y		Y
047-330-01		Y	Y		Y	Y		Y
047-330-02		Y	Y		Y	Y		Y
047-330-03		Y	Y		Y	Y		Y
047-330-04	Y	Y	Y		Y	Y		Y
047-330-05	Y	Y		Y	Y	Y		Y
047-330-06	Y	Y			Y	Y		Y
047-330-07	Y				Y	Y		Y
047-330-08	Y	Y			Y	Y		Y
047-330-09				Y	Y	Y		Y
047-330-10					Y	Y		Y
047-330-11	Y	Y			Y	Y		Y
047-330-12	Y	Y			Y	Y		Y
047-330-13	Y	Y			Y	Y		Y
047-330-16	Y	Y		Y	Y	Y		Y
047-330-17	Y	Y		Y	Y	Y		Y
047-330-18	Y	Y			Y	Y		Y
047-330-19	Y			Y	Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
047-330-20	Y			Y	Y	Y		Y
047-330-21	Y			Y	Y	Y		Y
047-330-22	Y		Y		Y	Y		Y
047-330-24		Y			Y	Y		Y
047-330-25	Y	Y	Y		Y	Y		Y
047-330-26	Y		Y		Y	Y		Y
047-330-27	Y	Y	Y	Y	Y	Y		Y
047-330-28	Y				Y	Y		Y
047-330-29	Y	Y			Y	Y		Y
047-330-30	Y				Y	Y		Y
047-330-31		Y			Y	Y		Y
047-330-32	Y	Y			Y	Y		Y
047-330-33	Y				Y	Y		Y
047-330-35	Y				Y	Y		Y
047-330-36	Y			Y	Y	Y		Y
047-330-37	Y	Y			Y	Y		Y
047-330-38				Y	Y	Y		Y
047-330-39	Y	Y		Y	Y	Y		Y
047-330-40	Y			Y	Y	Y		Y
047-330-41	Y	Y			Y	Y		Y
047-330-42	Y				Y	Y		Y
047-330-43	Y	Y			Y	Y		Y
047-330-44		Y			Y	Y		Y
047-330-45	Y				Y	Y		Y
047-330-46		Y			Y	Y		Y
047-330-47	Y	Y	Y		Y	Y		Y
047-330-48		Y	Y		Y	Y		Y
047-330-49	Y		Y	Y	Y	Y		Y
047-330-50		Y	Y		Y	Y		Y
047-330-51					Y	Y		Y
047-330-54		Y	Y		Y	Y		Y
047-341-01		Y		Y	Y	Y		Y
047-341-02	Y				Y	Y		Y
047-341-03	Y				Y	Y		Y
047-341-04	Y				Y	Y		Y
047-341-05	Y	Y		Y	Y	Y		Y
047-341-06	Y				Y	Y		Y
047-341-07	Y				Y	Y		Y
047-341-08	Y	Y		Y	Y	Y		Y
047-341-09	Y	Y			Y	Y		Y
047-341-10	Y	Y		Y	Y	Y		Y
047-341-11	Y				Y	Y		Y
047-341-12				Y	Y	Y		Y
047-341-16	Y		Y		Y	Y		Y
047-341-17	Y		Y		Y	Y		Y
047-341-18	Y	Y	Y		Y	Y		Y
047-341-21		Y	Y		Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
047-341-24	Y	Y			Y	Y		Y
047-341-25	Y				Y	Y		Y
047-341-26	Y				Y	Y		Y
047-341-27	Y				Y	Y		Y
047-341-28	Y			Y	Y	Y		Y
047-341-29	Y				Y	Y		Y
047-341-30	Y			Y	Y	Y		Y
047-341-31	Y				Y	Y		Y
047-341-32	Y	Y		Y	Y	Y		Y
047-341-33	Y	Y			Y	Y		Y
047-341-34				Y	Y	Y		Y
047-341-36	Y	Y	Y		Y	Y		Y
047-341-37		Y	Y		Y	Y		Y
047-341-39	Y		Y		Y	Y		Y
047-341-40	Y	Y	Y		Y	Y		Y
047-341-41	Y	Y	Y		Y	Y		Y
047-341-42	Y	Y	Y	Y	Y	Y		Y
047-342-01	Y		Y		Y	Y	Y	Y
047-342-02	Y		Y	Y	Y	Y		Y
047-342-03			Y		Y	Y		Y
047-342-04	Y	Y			Y	Y		Y
047-342-05	Y				Y	Y		Y
047-342-06	Y				Y	Y		Y
047-342-07	Y				Y	Y		Y
047-342-08	Y			Y	Y	Y		Y
047-342-09	Y				Y	Y		Y
047-342-10	Y	Y			Y	Y		Y
047-342-11	Y			Y	Y	Y		Y
047-342-12	Y	Y			Y	Y		Y
047-342-13	Y				Y	Y		Y
047-342-14	Y	Y		Y	Y	Y		Y
047-342-15	Y				Y	Y		Y
047-342-16	Y			Y	Y	Y		Y
047-342-17	Y	Y		Y	Y	Y		Y
047-342-18	Y	Y		Y	Y	Y		Y
047-342-19	Y				Y	Y		Y
047-342-20					Y	Y		Y
047-342-21	Y			Y	Y	Y		Y
047-342-22	Y	Y			Y	Y		Y
047-342-23	Y	Y			Y	Y		Y
047-342-24	Y			Y	Y	Y		Y
047-342-25	Y				Y	Y		Y
047-342-26				Y	Y	Y		Y
047-342-27	Y	Y			Y	Y		Y
047-342-28	Y	Y			Y	Y		Y
047-342-29	Y	Y			Y	Y		Y
047-342-30	Y	Y			Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
047-342-31					Y	Y		Y
047-342-32		Y	Y		Y	Y		Y
047-342-33	Y	Y	Y		Y	Y		Y
047-342-34	Y	Y	Y		Y	Y		Y
047-342-35			Y	Y	Y	Y		Y
047-351-01		Y	Y		Y	Y		Y
047-351-02		Y	Y		Y	Y	Y	Y
047-351-03	Y	Y	Y		Y	Y		Y
047-351-04	Y	Y	Y		Y	Y		Y
047-351-05			Y	Y	Y	Y		Y
047-351-06		Y	Y		Y	Y		Y
047-351-07	Y		Y		Y	Y		Y
047-351-08	Y		Y		Y	Y		Y
047-351-09	Y		Y		Y	Y		Y
047-351-10			Y		Y	Y		Y
047-351-11	Y	Y	Y		Y	Y		Y
047-351-12	Y	Y	Y		Y	Y		Y
047-351-13		Y	Y		Y	Y	Y	Y
047-351-14	Y	Y	Y		Y	Y		Y
047-351-15		Y			Y	Y		Y
047-351-16	Y		Y	Y	Y	Y		Y
047-351-17	Y				Y	Y		Y
047-351-18	Y		Y		Y	Y		Y
047-351-19	Y		Y		Y	Y		Y
047-351-20	Y	Y	Y		Y	Y		Y
047-351-21		Y	Y		Y	Y		Y
047-351-22			Y		Y	Y		Y
047-351-23	Y				Y	Y		Y
047-351-24	Y	Y	Y		Y	Y		Y
047-351-25	Y		Y		Y	Y		Y
047-351-26		Y	Y	Y	Y	Y		Y
047-352-01	Y		Y		Y	Y		Y
047-352-02	Y	Y	Y	Y	Y	Y		Y
047-352-03	Y		Y	Y	Y	Y		Y
047-352-04					Y	Y		Y
047-352-05	Y	Y			Y	Y		Y
047-352-06	Y	Y		Y	Y	Y		Y
047-352-07		Y			Y	Y		Y
047-352-08		Y			Y	Y		Y
047-352-09					Y	Y		Y
047-352-10		Y			Y	Y		Y
047-352-11					Y	Y		Y
047-352-12		Y			Y	Y		Y
047-352-13	Y				Y	Y		Y
047-352-14	Y	Y		Y	Y	Y		Y
047-352-15		Y			Y	Y		Y
047-352-16	Y			Y	Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
047-352-17					Y	Y		Y
047-352-18	Y			Y	Y	Y		Y
047-352-19	Y	Y		Y	Y	Y		Y
047-352-20	Y	Y			Y	Y		Y
047-352-21	Y	Y			Y	Y		Y
047-352-22		Y			Y	Y		Y
047-352-23	Y				Y	Y		Y
047-352-24	Y			Y	Y	Y		Y
047-352-25	Y	Y			Y	Y		Y
047-352-26	Y				Y	Y		Y
047-352-27	Y			Y	Y	Y		Y
047-352-28	Y				Y	Y		Y
047-352-31	Y				Y	Y		Y
047-352-32					Y	Y		Y
047-352-33		Y	Y		Y	Y		Y
047-352-34	Y	Y			Y	Y		Y
047-353-01		Y	Y		Y	Y	Y	Y
047-353-02		Y	Y		Y	Y		Y
047-353-03		Y	Y		Y	Y		Y
047-353-04		Y	Y		Y	Y		Y
047-353-05	Y	Y	Y		Y	Y		Y
047-353-06	Y		Y		Y	Y		Y
047-353-07		Y	Y		Y	Y		Y
047-353-08		Y	Y		Y	Y		Y
047-353-09		Y	Y		Y	Y		Y
047-353-10		Y	Y		Y	Y		Y
047-353-11			Y		Y	Y		Y
047-353-12	Y	Y	Y		Y	Y		Y
047-353-13	Y	Y	Y		Y	Y		Y
047-353-14	Y		Y		Y	Y		Y
047-353-15	Y	Y	Y		Y	Y		Y
047-353-16	Y	Y			Y	Y		Y
047-353-17		Y	Y		Y	Y		Y
047-353-18			Y		Y	Y		Y
047-353-19	Y	Y	Y		Y	Y		Y
047-353-20	Y			Y	Y	Y		Y
047-353-21	Y		Y	Y	Y	Y		Y
047-354-01	Y	Y			Y	Y		Y
047-354-02	Y	Y		Y	Y	Y		Y
047-354-03	Y			Y	Y	Y		Y
047-354-04	Y	Y		Y	Y	Y		Y
047-354-05	Y				Y	Y		Y
047-354-06	Y			Y	Y	Y		Y
047-354-07	Y	Y		Y	Y	Y		Y
047-354-08	Y				Y	Y		Y
047-354-09	Y				Y	Y		Y
047-354-10	Y				Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
047-354-11	Y				Y	Y		Y
047-354-12		Y			Y	Y		Y
047-354-13	Y				Y	Y		Y
047-354-14	Y	Y	Y		Y	Y		Y
047-354-15		Y	Y		Y	Y		Y
047-354-32					Y	Y		Y
047-354-33		Y			Y	Y		Y
047-360-01	Y	Y		Y	Y	Y		Y
047-360-02	Y	Y		Y	Y	Y		Y
047-360-03		Y		Y	Y	Y		Y
047-360-04	Y		Y	Y	Y	Y		Y
047-360-05	Y		Y	Y	Y	Y		Y
047-360-06		Y	Y		Y	Y		Y
047-370-01	Y	Y			Y	Y		Y
047-370-02	Y	Y		Y	Y	Y		Y
047-370-03	Y				Y	Y		Y
047-370-04	Y			Y	Y	Y		Y
047-370-05	Y	Y			Y	Y		Y
047-370-06	Y	Y		Y	Y	Y		Y
047-370-07	Y	Y			Y	Y		Y
047-370-08	Y	Y			Y	Y		Y
047-370-09		Y			Y	Y		Y
047-370-10	Y				Y	Y		Y
047-370-11	Y	Y			Y	Y		Y
047-370-12	Y				Y	Y		Y
047-370-13	Y	Y		Y	Y	Y		Y
047-370-14	Y	Y			Y	Y		Y
047-370-15					Y	Y		Y
047-370-16	Y	Y	Y		Y	Y		Y
047-370-17		Y	Y		Y	Y		Y
047-370-18	Y		Y		Y	Y		Y
047-370-19	Y				Y	Y		Y
047-370-20	Y				Y	Y		Y
047-370-21	Y				Y	Y		Y
047-370-22	Y				Y	Y		Y
047-370-23	Y	Y		Y	Y	Y		Y
047-370-26	Y				Y	Y		Y
047-370-27	Y				Y	Y		Y
047-370-28	Y				Y	Y		Y
047-370-29	Y	Y		Y	Y	Y		Y
047-370-30	Y				Y	Y		Y
047-370-31		Y			Y	Y		Y
047-380-01	Y	Y			Y	Y		Y
047-380-02	Y	Y			Y	Y		Y
047-380-03	Y	Y			Y	Y		Y
047-380-04	Y				Y	Y		Y
047-380-05	Y				Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
047-380-06	Y	Y			Y	Y		Y
047-380-07	Y	Y			Y	Y		Y
047-380-08		Y			Y	Y		Y
047-380-09	Y				Y	Y	Y	Y
047-380-10	Y	Y		Y	Y	Y		Y
047-380-11	Y				Y	Y		Y
047-390-02		Y	Y		Y	Y		Y
047-390-03	Y				Y	Y		Y
047-390-04		Y	Y	Y	Y	Y		Y
047-390-05	Y	Y		Y	Y	Y		Y
047-390-06		Y			Y	Y		Y
047-390-07		Y	Y		Y	Y		Y
047-390-08	Y	Y	Y		Y	Y		Y
047-390-09	Y				Y	Y		Y
047-390-10	Y	Y			Y	Y		Y
047-390-11	Y				Y	Y		Y
047-390-12	Y	Y			Y	Y		Y
047-390-13	Y	Y			Y	Y		Y
047-390-14	Y				Y	Y		Y
047-390-16			Y		Y	Y		Y
047-390-17	Y	Y			Y	Y		Y
047-390-18		Y			Y	Y		Y
047-390-19					Y	Y		Y
047-400-04		Y	Y		Y	Y		Y
047-400-05	Y	Y	Y		Y	Y		Y
047-400-07		Y	Y		Y	Y		Y
047-410-01		Y	Y		Y	Y		Y
047-410-02	Y	Y			Y	Y		Y
047-410-03	Y				Y	Y		Y
047-410-04	Y				Y	Y		Y
047-410-05	Y				Y	Y		Y
047-410-06	Y				Y	Y		Y
047-410-07	Y	Y			Y	Y		Y
047-410-08	Y				Y	Y		Y
047-410-09	Y				Y	Y		Y
047-410-10	Y	Y		Y	Y	Y		Y
047-410-11	Y	Y		Y	Y	Y		Y
047-410-12	Y			Y	Y	Y		Y
047-410-13	Y	Y		Y	Y	Y		Y
047-410-15	Y				Y	Y		Y
047-410-16	Y	Y			Y	Y		Y
047-410-17	Y				Y	Y		Y
047-410-18	Y				Y	Y		Y
047-410-19	Y				Y	Y		Y
047-410-20	Y				Y	Y		Y
047-410-21	Y				Y	Y		Y
047-410-22	Y	Y			Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
047-410-23	Y				Y	Y		Y
047-410-24	Y				Y	Y		Y
047-410-25	Y				Y	Y		Y
047-410-26	Y				Y	Y		Y
047-410-27	Y				Y	Y		Y
047-410-28	Y				Y	Y		Y
047-410-29	Y				Y	Y		Y
047-410-30	Y				Y	Y		Y
047-410-31	Y				Y	Y		Y
047-410-32	Y				Y	Y		Y
047-410-33	Y				Y	Y		Y
047-410-34	Y				Y	Y		Y
047-410-38		Y	Y		Y	Y		Y
047-410-40			Y		Y	Y		Y
047-410-41		Y	Y		Y	Y		Y
047-410-42		Y	Y		Y	Y		Y
047-410-43		Y	Y		Y	Y		Y
047-410-44		Y	Y		Y	Y		Y
047-410-45	Y	Y			Y	Y		Y
047-420-04			Y		Y	Y		Y
047-420-05			Y		Y	Y		Y
047-420-06		Y	Y		Y	Y		Y
047-420-07		Y	Y		Y	Y		Y
047-420-09			Y		Y	Y		Y
047-420-11		Y	Y		Y	Y	Y	Y
047-420-12		Y	Y	Y	Y	Y		Y
047-420-13		Y	Y		Y	Y		Y
047-420-14		Y	Y		Y	Y		Y
047-430-01	Y		Y		Y	Y		Y
047-430-02	Y				Y	Y		Y
047-430-03	Y	Y			Y	Y		Y
047-430-04	Y				Y	Y		Y
047-430-05	Y				Y	Y		Y
047-430-06	Y				Y	Y		Y
047-430-07	Y	Y			Y	Y		Y
047-430-08	Y				Y	Y		Y
047-430-09	Y				Y	Y		Y
047-430-10	Y				Y	Y		Y
047-430-11	Y				Y	Y		Y
047-430-12	Y				Y	Y		Y
047-430-13	Y				Y	Y		Y
047-430-14	Y				Y	Y		Y
047-430-15	Y				Y	Y		Y
047-430-16	Y				Y	Y		Y
047-430-17	Y	Y			Y	Y		Y
047-430-18	Y				Y	Y		Y
047-430-19	Y				Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
047-430-20	Y				Y	Y		Y
047-430-21	Y				Y	Y		Y
047-430-22	Y				Y	Y		Y
047-430-23	Y				Y	Y		Y
047-430-24	Y				Y	Y		Y
047-430-25	Y				Y	Y		Y
047-430-26	Y				Y	Y		Y
047-430-27	Y				Y	Y		Y
047-430-28	Y				Y	Y		Y
047-430-29	Y	Y			Y	Y		Y
047-430-30	Y	Y			Y	Y		Y
047-430-31	Y				Y	Y		Y
047-430-32	Y				Y	Y		Y
047-430-33	Y				Y	Y		Y
047-430-34	Y	Y			Y	Y		Y
047-430-35	Y	Y			Y	Y		Y
047-430-36	Y				Y	Y		Y
047-430-37	Y				Y	Y		Y
047-430-38	Y				Y	Y		Y
047-430-39	Y				Y	Y		Y
047-430-40	Y		Y		Y	Y		Y
047-430-41	Y	Y	Y		Y	Y		Y
047-430-42	Y		Y		Y	Y		Y
047-430-43	Y		Y		Y	Y		Y
047-430-44	Y	Y	Y		Y	Y		Y
047-430-45	Y		Y		Y	Y		Y
047-430-46	Y	Y	Y		Y	Y		Y
047-430-47	Y	Y	Y		Y	Y		Y
047-430-48	Y		Y		Y	Y		Y
047-430-49	Y		Y		Y	Y		Y
047-440-01	Y	Y	Y		Y	Y		Y
047-440-02	Y				Y	Y		Y
047-440-03	Y	Y			Y	Y		Y
047-440-04	Y	Y			Y	Y		Y
047-440-05	Y	Y			Y	Y		Y
047-440-06	Y				Y	Y		Y
047-440-07	Y				Y	Y		Y
047-440-08	Y				Y	Y		Y
047-440-09	Y				Y	Y		Y
047-440-10	Y				Y	Y		Y
047-440-11	Y				Y	Y		Y
047-440-12	Y	Y			Y	Y		Y
047-440-13	Y	Y			Y	Y		Y
047-440-14		Y			Y	Y		Y
047-440-15		Y			Y	Y		Y
047-440-16	Y				Y	Y		Y
047-440-17	Y				Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
047-440-18	Y				Y	Y		Y
047-440-19	Y	Y			Y	Y		Y
047-440-20		Y			Y	Y		Y
047-440-21	Y				Y	Y		Y
047-440-22	Y	Y			Y	Y		Y
047-440-23	Y	Y			Y	Y		Y
047-440-24	Y				Y	Y		Y
047-440-25	Y	Y			Y	Y		Y
047-440-26	Y				Y	Y		Y
047-440-27	Y	Y			Y	Y		Y
047-440-28	Y	Y			Y	Y		Y
047-440-29	Y				Y	Y		Y
047-440-30	Y				Y	Y		Y
047-440-31	Y	Y			Y	Y		Y
047-440-32	Y				Y	Y		Y
047-440-33	Y	Y			Y	Y		Y
047-440-34	Y				Y	Y		Y
047-440-35	Y	Y			Y	Y		Y
047-440-37	Y				Y	Y		Y
047-440-38	Y				Y	Y		Y
047-440-39	Y				Y	Y		Y
047-440-40	Y		Y		Y	Y		Y
047-440-41	Y		Y		Y	Y		Y
047-440-42	Y		Y		Y	Y		Y
047-440-43	Y		Y		Y	Y		Y
047-440-44	Y	Y	Y		Y	Y		Y
047-440-45	Y		Y		Y	Y		Y
047-440-46	Y	Y	Y		Y	Y		Y
047-440-47		Y	Y		Y	Y	Y	Y
047-440-48	Y	Y	Y		Y	Y		Y
047-440-51	Y				Y	Y		Y
047-440-53	Y				Y	Y		Y
047-440-55	Y	Y			Y	Y		Y
047-440-56	Y				Y	Y		Y
047-440-57	Y				Y	Y		Y
047-440-60	Y	Y	Y		Y	Y		Y
047-440-61	Y				Y	Y		Y
047-450-03					Y	Y		Y
047-450-13		Y		Y	Y	Y		Y
047-450-17					Y	Y		Y
047-450-18					Y	Y		Y
047-450-25			Y		Y	Y		Y
047-450-27		Y	Y		Y	Y		Y
047-450-28		Y	Y		Y	Y		Y
047-450-30				Y	Y	Y	Y	Y
047-450-31					Y	Y		Y
047-450-34					Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
047-450-35				Y	Y	Y		Y
047-450-37				Y	Y	Y		Y
047-450-38					Y	Y		Y
047-450-39					Y	Y		Y
047-460-13					Y	Y		Y
047-460-14		Y			Y	Y		Y
047-460-15		Y	Y		Y	Y		Y
047-460-16		Y			Y	Y		Y
047-460-17					Y	Y		Y
047-470-09		Y			Y	Y		Y
049-020-14					Y	Y		Y
049-030-04	Y		Y		Y	Y		Y
049-030-15					Y	Y		Y
049-030-16					Y	Y		Y
049-030-19		Y			Y	Y		Y
049-030-21					Y	Y		Y
049-030-22		Y			Y	Y		Y
049-030-23		Y			Y	Y		Y
049-040-12		Y			Y	Y		Y
049-040-16		Y			Y	Y		Y
049-040-19					Y	Y		Y
049-040-31		Y			Y	Y		Y
049-040-37					Y	Y		Y
049-040-38					Y	Y		Y
049-040-43				Y	Y	Y		Y
049-040-44					Y	Y		Y
049-040-47		Y			Y	Y		Y
049-040-56					Y	Y	Y	Y
049-040-57					Y	Y	Y	Y
049-040-58		Y			Y	Y	Y	Y
049-040-59					Y	Y		Y
049-040-63		Y			Y	Y		Y
049-040-64		Y			Y	Y		Y
049-040-67		Y			Y	Y		Y
049-040-68		Y			Y	Y		Y
049-040-70					Y	Y		Y
049-040-71		Y			Y	Y	Y	Y
049-040-72		Y			Y	Y		Y
049-040-73					Y	Y		Y
049-040-74					Y	Y		Y
049-040-75					Y	Y	Y	Y
049-040-76					Y	Y		Y
049-040-77				Y	Y	Y		Y
049-040-80					Y	Y		Y
049-040-81					Y	Y	Y	Y
049-040-82					Y	Y	Y	Y
049-040-89					Y	Y	Y	Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
049-040-90					Y	Y	Y	Y
049-040-92		Y			Y	Y	Y	Y
049-040-93		Y			Y	Y		Y
049-050-01		Y		Y	Y	Y		Y
049-050-02					Y	Y		Y
049-050-03		Y		Y	Y	Y		Y
049-050-07		Y			Y	Y		Y
049-050-09		Y	Y		Y	Y		Y
049-050-10	Y		Y		Y	Y		Y
049-050-11					Y	Y		Y
049-050-12		Y			Y	Y		Y
049-050-13		Y			Y	Y		Y
049-050-14		Y	Y		Y	Y		Y
049-050-15	Y	Y	Y		Y	Y		Y
049-050-16		Y	Y		Y	Y		Y
049-050-19		Y			Y	Y		Y
049-050-23		Y			Y	Y		Y
049-050-24		Y			Y	Y		Y
049-050-25		Y		Y	Y	Y		Y
049-050-26				Y	Y	Y		Y
049-050-27		Y	Y	Y	Y	Y		Y
049-050-28		Y	Y		Y	Y		Y
049-050-29			Y	Y	Y	Y		Y
049-050-30		Y	Y		Y	Y		Y
049-050-31		Y			Y	Y		Y
049-050-32					Y	Y		Y
049-050-36		Y			Y	Y		Y
049-050-39		Y	Y		Y	Y		Y
049-050-40		Y	Y		Y	Y		Y
049-050-42					Y	Y		Y
049-050-44				Y	Y	Y		Y
049-050-47					Y	Y	Y	Y
049-050-49				Y	Y	Y		Y
049-050-50		Y	Y		Y	Y		Y
049-050-56	Y		Y		Y	Y		Y
049-050-57		Y	Y		Y	Y		Y
049-050-58	Y	Y	Y		Y	Y		Y
049-050-59			Y		Y	Y		Y
049-050-60			Y		Y	Y	Y	Y
049-050-61					Y	Y	Y	Y
049-050-62					Y	Y		Y
049-060-02	Y	Y	Y		Y	Y		Y
049-060-03		Y			Y	Y		Y
049-060-04		Y			Y	Y		Y
049-060-07		Y			Y	Y		Y
049-060-08					Y	Y		Y
049-060-09		Y	Y		Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
049-060-10		Y	Y		Y	Y		Y
049-060-11		Y	Y		Y	Y		Y
049-060-12		Y			Y	Y		Y
049-060-13		Y			Y	Y		Y
049-060-14					Y	Y		Y
049-060-15		Y			Y	Y		Y
049-060-18		Y			Y	Y		Y
049-060-19					Y	Y		Y
049-080-07					Y	Y		Y
049-080-08	Y	Y	Y		Y	Y		Y
049-080-09	Y	Y	Y		Y	Y		Y
049-080-10	Y	Y	Y		Y	Y		Y
049-080-11		Y			Y	Y		Y
049-080-17					Y	Y		Y
049-080-28					Y	Y		Y
049-080-33		Y			Y	Y	Y	Y
049-080-39					Y	Y		Y
049-080-40					Y	Y		Y
049-080-49	Y				Y	Y		Y
049-080-50		Y			Y	Y		Y
049-080-51			Y		Y	Y		Y
049-080-54	Y	Y	Y		Y	Y		Y
049-080-55					Y	Y		Y
049-080-56					Y	Y		Y
049-080-57					Y	Y		Y
049-080-58					Y	Y		Y
049-080-59					Y	Y		Y
049-080-63					Y	Y		Y
049-080-65					Y	Y		Y
049-080-66		Y			Y	Y		Y
049-080-67					Y	Y		Y
049-080-68		Y			Y	Y		Y
049-080-69					Y	Y		Y
049-080-70		Y			Y	Y		Y
049-080-74					Y	Y		Y
049-080-75					Y	Y		Y
049-080-76	Y		Y		Y	Y		Y
049-080-82					Y	Y		Y
049-080-83					Y	Y		Y
049-080-84			Y		Y	Y		Y
049-080-85					Y	Y		Y
049-080-86				Y	Y	Y		Y
049-080-87				Y	Y	Y		Y
049-080-90					Y	Y		Y
049-080-91			Y		Y	Y		Y
049-080-92					Y	Y		Y
049-090-15	Y		Y		Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
049-090-29		Y			Y	Y		Y
049-090-30		Y			Y	Y		Y
049-090-31		Y			Y	Y		Y
049-090-32		Y			Y	Y		Y
049-090-36		Y			Y	Y		Y
049-090-37					Y	Y		Y
049-090-38					Y	Y		Y
049-090-39		Y			Y	Y		Y
049-090-40		Y			Y	Y		Y
049-090-41					Y	Y		Y
049-130-64		Y			Y	Y		Y
049-150-01					Y	Y		Y
049-150-02					Y	Y	Y	Y
049-150-03					Y	Y		Y
049-150-04					Y	Y		Y
049-150-05					Y	Y		Y
049-150-06		Y			Y	Y	Y	Y
049-150-09					Y	Y		Y
049-150-10					Y	Y		Y
049-150-11					Y	Y		Y
049-150-12					Y	Y		Y
049-150-13					Y	Y		Y
049-160-04					Y	Y	Y	Y
049-160-05		Y		Y	Y	Y		Y
049-160-12					Y	Y		Y
049-160-14					Y	Y		Y
049-160-15				Y	Y	Y		Y
049-160-16				Y	Y	Y		Y
049-170-11		Y			Y	Y		Y
049-170-12		Y			Y	Y		Y
049-170-13		Y			Y	Y		Y
049-170-14		Y			Y	Y	Y	Y
049-170-15		Y			Y	Y		Y
049-170-16		Y			Y	Y		Y
049-170-17		Y			Y	Y		Y
049-170-18		Y			Y	Y		Y
049-170-23		Y			Y	Y		Y
049-170-30		Y			Y	Y		Y
049-170-36		Y			Y	Y		Y
049-170-37		Y			Y	Y		Y
049-180-01		Y			Y	Y		Y
049-180-02		Y			Y	Y		Y
049-180-03		Y			Y	Y		Y
049-180-04		Y			Y	Y		Y
049-180-05		Y			Y	Y		Y
049-180-09		Y			Y	Y		Y
049-180-10		Y			Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
049-180-12		Y			Y	Y		Y
049-180-13		Y			Y	Y		Y
049-180-14		Y			Y	Y		Y
049-180-15		Y			Y	Y		Y
049-180-16		Y			Y	Y		Y
049-180-17		Y			Y	Y		Y
049-180-18		Y			Y	Y		Y
049-180-19		Y			Y	Y		Y
049-180-20		Y			Y	Y		Y
049-180-21		Y			Y	Y		Y
049-180-22		Y			Y	Y		Y
049-180-23		Y			Y	Y		Y
049-180-24		Y			Y	Y		Y
049-180-25		Y			Y	Y		Y
049-180-26		Y			Y	Y		Y
049-180-27		Y		Y	Y	Y		Y
049-180-28		Y		Y	Y	Y		Y
049-180-29		Y			Y	Y		Y
049-180-30		Y			Y	Y		Y
049-190-01					Y	Y		Y
049-190-02					Y	Y		Y
049-190-13		Y			Y	Y		Y
049-190-14		Y			Y	Y		Y
049-190-15		Y			Y	Y		Y
049-190-16					Y	Y		Y
049-190-17					Y	Y		Y
049-190-18					Y	Y		Y
049-190-19					Y	Y		Y
049-190-25					Y	Y		Y
049-190-26					Y	Y		Y
049-190-27					Y	Y		Y
049-190-28					Y	Y		Y
049-190-29		Y			Y	Y		Y
049-190-30		Y			Y	Y		Y
049-190-31					Y	Y		Y
049-190-32					Y	Y		Y
049-190-33					Y	Y		Y
049-190-34					Y	Y		Y
049-190-35					Y	Y		Y
049-190-36					Y	Y		Y
049-190-44					Y	Y		Y
049-190-45					Y	Y		Y
049-190-48					Y	Y		Y
049-190-50					Y	Y		Y
049-190-52					Y	Y		Y
049-190-53					Y	Y		Y
049-190-54					Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
049-190-55					Y	Y		Y
049-190-57					Y	Y		Y
049-190-58					Y	Y		Y
049-190-59					Y	Y		Y
049-190-60					Y	Y		Y
049-190-61					Y	Y		Y
049-240-04					Y	Y		Y
049-250-02					Y	Y		Y
049-250-03					Y	Y		Y
049-250-13					Y	Y		Y
049-250-14					Y	Y		Y
049-250-15					Y	Y		Y
049-250-17					Y	Y		Y
049-250-18					Y	Y		Y
049-250-23					Y	Y		Y
049-250-24					Y	Y		Y
049-250-25					Y	Y		Y
049-250-26		Y			Y	Y	Y	Y
049-250-27		Y			Y	Y		Y
049-250-28					Y	Y		Y
049-250-29					Y	Y		Y
049-250-30					Y	Y		Y
049-250-31					Y	Y		Y
049-250-33					Y	Y	Y	Y
049-250-61					Y	Y		Y
049-250-63				Y	Y	Y		Y
049-250-66					Y	Y		Y
049-250-67					Y	Y		Y
049-250-68					Y	Y	Y	Y
049-250-70					Y	Y		Y
049-250-71					Y	Y		Y
049-250-76					Y	Y		Y
049-250-77					Y	Y		Y
049-250-78					Y	Y		Y
049-250-79					Y	Y		Y
049-250-80		Y			Y	Y		Y
049-250-81		Y			Y	Y		Y
049-250-82					Y	Y		Y
049-250-83					Y	Y		Y
049-260-04					Y	Y		Y
049-290-17					Y	Y		Y
049-300-01				Y	Y	Y		Y
049-300-02				Y	Y	Y		Y
049-300-03				Y	Y	Y		Y
049-300-05				Y	Y	Y		Y
049-300-06				Y	Y	Y		Y
049-300-07				Y	Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
049-300-08				Y	Y	Y		Y
049-300-09				Y	Y	Y		Y
049-300-10				Y	Y	Y		Y
049-300-11				Y	Y	Y		Y
049-300-12				Y	Y	Y		Y
049-300-13				Y	Y	Y		Y
049-300-14				Y	Y	Y		Y
049-300-15				Y	Y	Y		Y
049-300-16				Y	Y	Y		Y
060-040-01					Y	Y		Y
060-040-02		Y			Y	Y		Y
060-040-05					Y	Y		Y
060-040-07					Y	Y		Y
060-040-08					Y	Y		Y
060-040-09					Y	Y		Y
060-040-10					Y	Y		Y
060-040-11		Y			Y	Y		Y
060-040-12		Y			Y	Y		Y
060-040-13					Y	Y		Y
060-040-14		Y			Y	Y		Y
060-040-17					Y	Y		Y
060-040-18					Y	Y		Y
060-040-19		Y			Y	Y		Y
060-040-20		Y		Y	Y	Y		Y
060-040-21				Y	Y	Y		Y
062-010-03					Y	Y		Y
062-010-04					Y	Y		Y
062-010-05					Y	Y		Y
062-010-06					Y	Y		Y
062-010-07					Y	Y		Y
062-010-08					Y	Y		Y
062-020-03		Y			Y	Y		Y
062-020-04					Y	Y		Y
062-020-05		Y			Y	Y		Y
062-020-06					Y	Y		Y
062-020-07					Y	Y		Y
062-020-08					Y	Y		Y
062-020-09		Y			Y	Y	Y	Y
062-020-41					Y	Y		Y
062-020-42		Y			Y	Y		Y
062-020-43		Y			Y	Y		Y
062-030-01		Y			Y	Y		Y
062-030-02		Y			Y	Y		Y
062-030-03					Y	Y		Y
062-030-04					Y	Y		Y
062-030-05					Y	Y		Y
062-030-06					Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
062-030-07		Y			Y	Y		Y
062-030-08		Y			Y	Y		Y
062-030-09					Y	Y		Y
062-030-10					Y	Y		Y
062-030-11					Y	Y		Y
062-030-12					Y	Y		Y
062-030-13					Y	Y		Y
062-030-14					Y	Y		Y
062-030-15					Y	Y		Y
062-030-16					Y	Y		Y
062-030-17					Y	Y		Y
062-030-18					Y	Y		Y
062-030-19					Y	Y		Y
062-030-20					Y	Y		Y
062-030-21					Y	Y		Y
062-030-22					Y	Y		Y
062-030-23					Y	Y		Y
062-030-24					Y	Y		Y
062-030-25					Y	Y		Y
062-030-26					Y	Y		Y
062-030-27		Y			Y	Y		Y
062-030-28					Y	Y		Y
062-030-29					Y	Y		Y
062-030-30					Y	Y		Y
062-030-31					Y	Y		Y
062-030-32					Y	Y		Y
062-030-33					Y	Y		Y
062-030-34		Y			Y	Y		Y
062-030-35		Y			Y	Y		Y
062-030-36		Y			Y	Y		Y
062-030-37					Y	Y		Y
062-030-38					Y	Y		Y
062-030-39					Y	Y		Y
062-030-40		Y			Y	Y		Y
062-030-41					Y	Y		Y
062-030-42		Y			Y	Y		Y
062-030-43		Y			Y	Y		Y
062-030-44					Y	Y		Y
062-030-45					Y	Y		Y
062-030-46					Y	Y		Y
062-030-47		Y			Y	Y		Y
062-030-48					Y	Y		Y
062-030-49					Y	Y		Y
062-030-50					Y	Y		Y
062-030-51					Y	Y		Y
062-030-52					Y	Y		Y
062-030-53		Y			Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
062-030-54					Y	Y		Y
062-030-55					Y	Y		Y
062-030-56		Y			Y	Y		Y
062-030-57		Y			Y	Y		Y
062-030-58					Y	Y		Y
062-030-59		Y			Y	Y		Y
062-030-60					Y	Y		Y
062-030-61		Y			Y	Y		Y
062-041-01					Y	Y		Y
062-041-02					Y	Y		Y
062-041-03	Y	Y			Y	Y		Y
062-041-04	Y				Y	Y		Y
062-041-05	Y	Y			Y	Y		Y
062-041-06	Y	Y			Y	Y		Y
062-041-07	Y	Y			Y	Y		Y
062-041-08		Y			Y	Y		Y
062-042-01	Y				Y	Y		Y
062-042-02	Y				Y	Y		Y
062-042-03					Y	Y		Y
062-042-04	Y				Y	Y		Y
062-042-05	Y	Y			Y	Y		Y
062-042-06	Y	Y			Y	Y		Y
062-042-07	Y	Y			Y	Y		Y
062-042-08	Y				Y	Y		Y
062-042-09	Y				Y	Y		Y
062-042-10	Y				Y	Y		Y
062-042-11	Y				Y	Y		Y
062-042-12	Y				Y	Y		Y
062-042-13	Y	Y			Y	Y		Y
062-042-14	Y				Y	Y		Y
062-042-15	Y				Y	Y		Y
062-042-16	Y	Y			Y	Y		Y
062-042-17		Y			Y	Y		Y
062-043-01	Y				Y	Y		Y
062-043-02	Y	Y			Y	Y		Y
062-043-03	Y				Y	Y		Y
062-043-04	Y	Y			Y	Y		Y
062-043-05	Y				Y	Y		Y
062-043-06	Y				Y	Y		Y
062-043-07	Y	Y			Y	Y		Y
062-043-08	Y	Y			Y	Y		Y
062-043-09	Y				Y	Y		Y
062-043-10	Y				Y	Y		Y
062-043-11	Y				Y	Y		Y
062-043-12	Y	Y			Y	Y		Y
062-043-13	Y				Y	Y		Y
062-043-14	Y	Y			Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
062-043-15	Y				Y	Y		Y
062-043-16	Y	Y			Y	Y		Y
062-043-17	Y				Y	Y		Y
062-043-18	Y				Y	Y		Y
062-043-19	Y				Y	Y		Y
062-043-20	Y	Y			Y	Y		Y
062-043-21	Y	Y			Y	Y		Y
062-043-22	Y	Y			Y	Y		Y
062-043-23	Y				Y	Y		Y
062-043-24	Y				Y	Y		Y
062-043-25	Y	Y			Y	Y		Y
062-043-26	Y				Y	Y		Y
062-043-27	Y	Y			Y	Y		Y
062-043-28	Y				Y	Y		Y
062-043-29	Y	Y			Y	Y		Y
062-043-30	Y				Y	Y		Y
062-044-01	Y				Y	Y		Y
062-044-02	Y	Y			Y	Y		Y
062-044-03	Y	Y			Y	Y		Y
062-044-04	Y	Y			Y	Y		Y
062-044-05	Y	Y			Y	Y		Y
062-044-06	Y	Y			Y	Y		Y
062-044-07	Y	Y			Y	Y		Y
062-044-08	Y	Y			Y	Y		Y
062-044-09	Y				Y	Y		Y
062-044-10	Y	Y			Y	Y		Y
062-044-11	Y				Y	Y		Y
062-044-12	Y				Y	Y		Y
062-044-13	Y	Y			Y	Y		Y
062-044-14	Y	Y			Y	Y		Y
062-044-15	Y	Y			Y	Y		Y
062-044-16	Y	Y			Y	Y		Y
062-044-17	Y	Y			Y	Y		Y
062-044-18	Y	Y			Y	Y		Y
062-044-19	Y				Y	Y		Y
062-044-20	Y				Y	Y		Y
062-044-21	Y	Y			Y	Y		Y
062-044-22	Y	Y			Y	Y		Y
062-044-23	Y	Y			Y	Y		Y
062-044-24	Y				Y	Y		Y
062-044-25	Y				Y	Y		Y
062-044-26	Y	Y			Y	Y		Y
062-044-27	Y				Y	Y		Y
062-044-28	Y	Y			Y	Y		Y
062-044-29	Y				Y	Y		Y
062-044-30	Y	Y			Y	Y		Y
062-044-31	Y				Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
062-044-32	Y	Y			Y	Y		Y
062-044-33	Y				Y	Y		Y
062-044-34	Y				Y	Y		Y
062-044-35	Y				Y	Y		Y
062-044-36	Y				Y	Y		Y
062-045-01	Y	Y			Y	Y		Y
062-045-02	Y				Y	Y		Y
062-045-03	Y	Y			Y	Y		Y
062-045-04	Y				Y	Y		Y
062-045-05	Y	Y			Y	Y		Y
062-045-06	Y				Y	Y		Y
062-045-07	Y	Y			Y	Y		Y
062-045-08	Y				Y	Y		Y
062-045-09	Y				Y	Y		Y
062-045-10	Y				Y	Y		Y
062-046-01	Y				Y	Y		Y
062-046-02	Y				Y	Y		Y
062-046-03	Y				Y	Y		Y
062-046-04	Y				Y	Y		Y
062-046-05	Y	Y			Y	Y		Y
062-046-06	Y				Y	Y		Y
062-046-07	Y	Y			Y	Y		Y
062-046-08	Y				Y	Y		Y
062-046-09	Y				Y	Y		Y
062-046-10	Y				Y	Y		Y
062-046-11	Y				Y	Y		Y
062-046-12	Y				Y	Y		Y
062-046-13	Y				Y	Y		Y
062-046-14	Y	Y			Y	Y		Y
062-046-15	Y	Y			Y	Y		Y
062-046-16	Y				Y	Y		Y
062-046-17	Y	Y			Y	Y		Y
062-046-18	Y	Y			Y	Y		Y
062-046-19	Y				Y	Y		Y
062-046-20	Y	Y			Y	Y		Y
062-047-01	Y				Y	Y		Y
062-047-02	Y				Y	Y		Y
062-047-03	Y				Y	Y		Y
062-047-04	Y				Y	Y		Y
062-047-05	Y	Y			Y	Y		Y
062-047-06	Y	Y			Y	Y		Y
062-047-07	Y				Y	Y		Y
062-047-08	Y			Y	Y	Y		Y
062-047-09	Y				Y	Y		Y
062-047-10	Y				Y	Y		Y
062-047-11	Y	Y			Y	Y		Y
062-047-12	Y	Y			Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
062-047-13	Y			Y	Y	Y		Y
062-047-14	Y				Y	Y		Y
062-047-15	Y	Y			Y	Y		Y
062-047-16	Y				Y	Y		Y
062-047-17	Y	Y			Y	Y		Y
062-047-18	Y	Y			Y	Y		Y
062-047-19	Y	Y			Y	Y		Y
062-047-20	Y				Y	Y		Y
062-047-21	Y				Y	Y		Y
062-047-22	Y				Y	Y		Y
062-050-01					Y	Y		Y
062-050-02		Y			Y	Y		Y
062-050-03				Y	Y	Y	Y	Y
062-050-04					Y	Y		Y
062-050-05					Y	Y		Y
062-050-08					Y	Y		Y
062-050-11		Y			Y	Y		Y
062-050-12	Y	Y	Y		Y	Y		Y
062-050-13					Y	Y		Y
062-060-01					Y	Y		Y
062-060-02		Y			Y	Y		Y
062-060-03					Y	Y		Y
062-060-06		Y			Y	Y		Y
062-060-07					Y	Y		Y
062-060-10		Y	Y		Y	Y	Y	Y
062-060-34				Y	Y	Y		Y
062-060-35				Y	Y	Y		Y
062-060-38		Y			Y	Y		Y
062-060-39			Y		Y	Y		Y
062-060-40		Y	Y		Y	Y		Y
062-060-41			Y		Y	Y		Y
062-060-42			Y		Y	Y		Y
062-060-46					Y	Y		Y
062-060-47		Y	Y		Y	Y		Y
062-060-48					Y	Y	Y	Y
062-060-51		Y			Y	Y		Y
062-060-52		Y			Y	Y		Y
062-060-53		Y			Y	Y	Y	Y
062-060-54					Y	Y		Y
062-070-10	Y		Y		Y	Y		Y
062-070-11	Y	Y	Y		Y	Y		Y
062-070-12	Y	Y	Y		Y	Y		Y
062-070-13	Y		Y		Y	Y		Y
062-070-14	Y		Y		Y	Y		Y
062-070-15	Y	Y	Y		Y	Y		Y
062-070-16	Y	Y	Y		Y	Y		Y
062-080-02					Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
062-080-06		Y	Y		Y	Y		Y
062-080-07		Y	Y		Y	Y		Y
062-080-08			Y	Y	Y	Y		Y
062-080-12		Y	Y		Y	Y		Y
062-080-13					Y	Y		Y
062-080-16		Y			Y	Y		Y
062-080-17		Y	Y		Y	Y		Y
062-080-18	Y	Y	Y		Y	Y		Y
062-080-19	Y	Y			Y	Y		Y
062-080-20		Y	Y		Y	Y		Y
062-080-21		Y			Y	Y		Y
062-080-22		Y			Y	Y		Y
062-080-23	Y				Y	Y		Y
062-080-24	Y				Y	Y		Y
062-080-25	Y				Y	Y		Y
062-080-26		Y	Y		Y	Y		Y
062-080-27		Y			Y	Y		Y
062-080-28			Y		Y	Y		Y
062-080-29					Y	Y		Y
062-150-01	Y				Y	Y		Y
062-150-02	Y				Y	Y		Y
062-150-03	Y	Y			Y	Y		Y
062-150-04	Y	Y			Y	Y		Y
062-150-07	Y	Y			Y	Y		Y
062-150-08	Y	Y			Y	Y		Y
062-150-09	Y				Y	Y		Y
062-150-10	Y				Y	Y		Y
062-150-11	Y	Y			Y	Y		Y
062-150-12	Y	Y			Y	Y		Y
062-150-13	Y	Y			Y	Y		Y
062-150-14	Y	Y			Y	Y		Y
062-150-15	Y	Y			Y	Y		Y
062-150-16	Y	Y			Y	Y		Y
062-150-17	Y				Y	Y		Y
062-150-18	Y	Y			Y	Y		Y
062-150-19	Y	Y			Y	Y		Y
062-150-20	Y	Y			Y	Y		Y
062-150-21	Y				Y	Y		Y
062-150-22	Y				Y	Y		Y
062-150-23	Y				Y	Y		Y
062-150-24	Y				Y	Y		Y
062-150-25	Y	Y			Y	Y		Y
062-150-26	Y				Y	Y		Y
062-150-27	Y	Y			Y	Y		Y
062-150-28	Y	Y			Y	Y		Y
062-150-29	Y				Y	Y		Y
062-150-30	Y				Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
062-150-31					Y	Y		Y
062-150-32					Y	Y		Y
062-150-33	Y				Y	Y		Y
062-160-01	Y	Y			Y	Y		Y
062-170-01	Y	Y			Y	Y		Y
062-180-18		Y			Y	Y		Y
062-190-01		Y			Y	Y		Y
062-190-02					Y	Y		Y
062-190-03					Y	Y		Y
062-190-04	Y				Y	Y		Y
062-190-05				Y	Y	Y		Y
062-190-06					Y	Y		Y
062-190-16		Y		Y	Y	Y		Y
062-190-17					Y	Y		Y
062-190-22				Y	Y	Y		Y
062-190-23				Y	Y	Y		Y
062-200-01	Y				Y	Y		Y
062-200-02	Y	Y			Y	Y		Y
062-200-03	Y	Y			Y	Y		Y
062-200-04	Y	Y			Y	Y		Y
062-200-05	Y	Y			Y	Y		Y
062-200-06					Y	Y		Y
062-210-01	Y				Y	Y		Y
062-210-02	Y	Y			Y	Y		Y
062-210-03	Y	Y			Y	Y		Y
062-210-04	Y				Y	Y		Y
062-210-05	Y	Y			Y	Y		Y
062-210-06	Y	Y			Y	Y		Y
062-210-07	Y	Y			Y	Y		Y
062-210-08	Y	Y			Y	Y		Y
062-210-09	Y	Y			Y	Y		Y
062-210-10	Y	Y			Y	Y		Y
062-210-11	Y	Y			Y	Y		Y
062-210-12	Y				Y	Y		Y
062-210-13	Y				Y	Y		Y
062-210-14	Y	Y			Y	Y		Y
062-210-15	Y	Y			Y	Y		Y
062-210-16	Y	Y			Y	Y		Y
062-210-17	Y	Y			Y	Y		Y
062-210-18	Y	Y			Y	Y		Y
062-210-19	Y	Y			Y	Y		Y
062-210-20	Y	Y			Y	Y		Y
062-210-21	Y	Y			Y	Y		Y
062-210-22	Y	Y			Y	Y		Y
062-210-23	Y				Y	Y		Y
062-280-01					Y	Y		Y
062-310-01		Y			Y	Y		Y

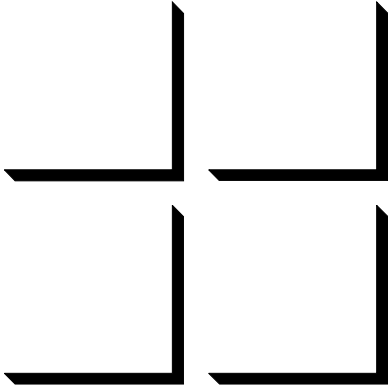
APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
062-310-02		Y			Y	Y		Y
062-310-03		Y			Y	Y		Y
062-310-04					Y	Y		Y
062-310-05					Y	Y		Y
062-310-06		Y			Y	Y		Y
062-310-07		Y			Y	Y		Y
062-310-08		Y			Y	Y		Y
062-310-09					Y	Y		Y
062-310-10		Y			Y	Y		Y
062-310-11		Y			Y	Y		Y
062-310-12					Y	Y		Y
062-310-13		Y			Y	Y		Y
062-310-14		Y			Y	Y		Y
062-310-15	Y	Y			Y	Y		Y
062-310-16	Y				Y	Y		Y
062-310-17	Y	Y			Y	Y		Y
062-310-18		Y			Y	Y		Y
062-310-19		Y			Y	Y		Y
062-320-01					Y	Y		Y
062-320-02					Y	Y		Y
062-320-03					Y	Y		Y
062-320-04					Y	Y		Y
062-320-05					Y	Y		Y
062-320-06					Y	Y		Y
062-320-07					Y	Y		Y
062-320-08		Y			Y	Y		Y
062-320-09					Y	Y		Y
062-320-10					Y	Y		Y
062-320-11		Y			Y	Y		Y
062-320-12					Y	Y		Y
062-320-13					Y	Y		Y
062-320-14					Y	Y		Y
062-320-15					Y	Y		Y
062-320-16					Y	Y		Y
062-320-17		Y			Y	Y		Y
062-320-18					Y	Y		Y
062-320-19					Y	Y		Y
062-320-20		Y			Y	Y		Y
062-320-21					Y	Y		Y
062-320-22					Y	Y		Y
062-320-23					Y	Y		Y
062-320-24					Y	Y		Y
062-320-25		Y			Y	Y		Y
062-320-26					Y	Y		Y
062-320-27					Y	Y		Y
062-320-28					Y	Y		Y
062-320-29					Y	Y		Y

APN	33031(a)(1)	33031(a)(2)	33031(a)(3)	33031(a)(4)	33031(b)(1)	33031(b)(2)	33031(b)(3)	33031(b)(6)
062-320-30					Y	Y		Y
062-320-31					Y	Y		Y
062-320-32		Y			Y	Y		Y
062-320-33					Y	Y		Y
062-320-34					Y	Y		Y
062-320-35					Y	Y		Y
062-320-36					Y	Y		Y
062-320-37					Y	Y		Y
062-320-38					Y	Y		Y
062-320-39		Y			Y	Y		Y
062-320-40					Y	Y		Y
062-320-41					Y	Y		Y
062-320-42					Y	Y		Y
062-320-43					Y	Y		Y
062-320-44		Y			Y	Y		Y
062-320-45					Y	Y		Y
062-320-46					Y	Y		Y
062-320-47					Y	Y		Y
062-320-48					Y	Y		Y
062-320-49					Y	Y		Y
062-320-50					Y	Y		Y
062-320-51					Y	Y		Y
062-450-11					Y	Y		Y
062-490-01	Y				Y	Y		Y
062-490-02			Y		Y	Y		Y
062-490-03	Y	Y			Y	Y		Y
062-490-04		Y	Y		Y	Y		Y
062-490-05		Y		Y	Y	Y		Y
062-490-06	Y				Y	Y		Y
062-490-07	Y				Y	Y		Y
062-490-08		Y			Y	Y		Y
062-490-09	Y				Y	Y		Y
062-500-01		Y			Y	Y		Y
062-500-02	Y				Y	Y		Y
062-500-03		Y			Y	Y		Y
062-500-04	Y				Y	Y		Y
062-500-05					Y	Y		Y
062-500-06		Y			Y	Y		Y
062-510-01		Y			Y	Y		Y
062-510-02					Y	Y		Y
062-510-03		Y			Y	Y		Y

GRC
GRC
GRC

This page intentionally left blank

GRC
GRC
GRC



APPENDIX C

Redevelopment Plan

GRC GRC GRC
□ □ □

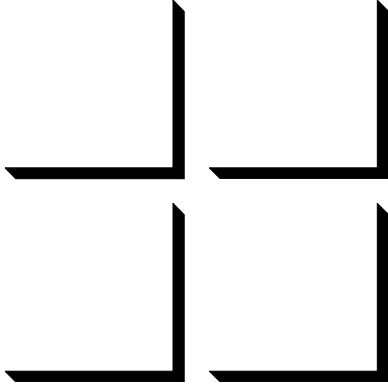
This page intentionally left blank

GRC GRC GRC
□ □ □

April 18, 2008

DRAFT
**Plan for the Lodi Community
Improvement Project**

REDEVELOPMENT AGENCY OF THE CITY OF LODI



Adopted:
Ordinance No.:

DRAFT

Plan for the Lodi Community Im-

provement Project

REDEVELOPMENT AGENCY OF THE CITY OF LODI

 GRC Redevelopment Consultants
701 South Parker Street
Suite 7400
Orange, CA 92868

DRAFT

Plan for the Lodi Community Improvement Project

CITY COUNCIL/ REDEVELOPMENT AGENCY

JoAnne Mounce, *Mayor/Chair*
Larry D. Hansen, *Mayor Pro Tem/Vice Chair*
Susan Hitchcock, *Councilperson/Member*
Bob Johnson, *Councilperson/Member*
Phil Katzakian, *Councilperson/Member*

PLANNING COMMISSION

Tim Mattheis, *Chair*
Wendel Kiser, *Vice-Chair*
Steve Hennecke, *Commissioner*
Dave Kirsten, *Commissioner*
Dennis White, *Commissioner*
Bill Cummins, *Commissioner*
Debbie Olson, *Commissioner*

CITY/AGENCY STAFF

Blair King, *City Manager/Executive Director*
Randy Hatch, *Community Development Director*
Peter Pirnejad, *Planning Manager*
Mark Huebsch, *Agency Special Counsel*
Stephen Schwabauer, *City Attorney*
Kirk Evans, *Budget Manager*
Immanuel Bereket, *Junior Planner*
Rick Caguiat, *Junior Planner*
David Morimoto, *Senior Planner*

DRAFT

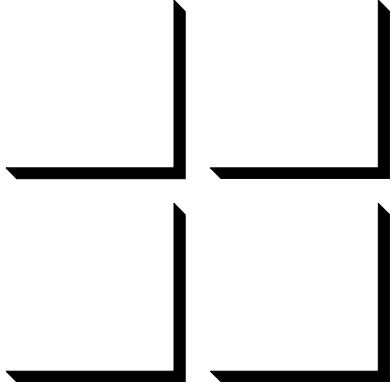
Plan for the Lodi Community Improvement Project

TABLE OF CONTENTS

I.	Introduction	1
A.	Background and Authority	1
B.	Purpose and Basis of this Plan	1
C.	Definitions	2
D.	Project Area Boundaries	3
II.	Development in the Project Area	5
A.	Project Objectives	5
B.	Conformance to the General Plan	8
C.	Specific Development Objectives	9
D.	Land Uses for the Project Area	9
E.	Public Uses for the Project Area	10
F.	General Development Requirements	10
G.	Development Procedures	12
III.	Redevelopment Implementation	15
A.	General	15
B.	Participation by Owners and Tenants	14
C.	Property Acquisition and Management	15
D.	Relocation of Persons, Families and Businesses	16
E.	Demolition, Clearance, Site Preparation, Project Improvements and Public Improvements	16
F.	Rehabilitation and Conservation of Structures	20
G.	Real Property Disposition and Development	21
H.	Other Agency Authority	25
IV.	Low- and Moderate-Income Housing	29
A.	20% Tax Increment Funds Requirement	29
B.	Low- and Moderate-Income Housing and Replacement	29
C.	Provision of Low- and Moderate-Income Housing	30
D.	New or Rehabilitated Dwelling Units Developed within the Project Area	31
E.	Last Resort Housing	32

V.	Project Financing	33
A.	General Description of the Proposed Financing Method	33
B.	Tax Increments.....	34
C.	Issuance of Bonds and Notes	35
D.	Loans and Grants.....	35
E.	Financing Limitations.....	36
F.	Low- and Moderate-Income Housing Fund	37
G.	Payments to Taxing Agencies.....	37
VI.	Administration	39
A.	Administration and Enforcement of this Plan.....	39
B.	Duration of this Plan’s Development Controls	39
C.	Procedure for Plan Amendment	40
D.	Agency/City Cooperation	40
E.	Cooperation with Other Public Jurisdictions	41

APPENDIX A: Redevelopment Plan Map
APPENDIX B: Project Area Legal Description



I. INTRODUCTION

A. (§100) BACKGROUND AND AUTHORITY

This Redevelopment Plan for the Lodi Community Improvement Project (the “Project”) was prepared by the Redevelopment Agency for the City of Lodi (the “Agency”) pursuant to the Community Redevelopment Law of the State of California (the “CRL;” Health and Safety Code Sections 33000, et seq.; all statutory references hereinafter shall be to the Health and Safety Code unless otherwise designated), the California Constitution, and all applicable laws, local codes, and ordinances. This Plan consists of this text, the attached Plan Map, and the attached Legal Description (Sections 100 through 640, and Appendices A and B, respectively).

B. (§110) PURPOSE AND BASIS OF THIS PLAN

The overall purpose of formulating this Plan is to provide for the elimination or alleviation of physical and economic blighting conditions, as defined in CRL Section 33030 and 33031, that affects an approximately 2,159-acre area (the “Project Area”). Broadly stated, these conditions include: physical deterioration of buildings and facilities; potential threats to the public health and safety, inadequate public improvements and facilities that are essential to the health and safety of local residents and property owners; areas of incompatible land uses; lots of irregular form and shape and of inadequate size for proper development; and land suffering from depreciated or stagnant values.

The basis for this Plan is the Preliminary Plan for the Lodi Community Improvement Project, adopted by the Planning Commission of the City of Lodi (the “Planning Commission”) on November 14, 2007.

C. (§120) DEFINITIONS

The following definitions will govern in the context of this Plan unless otherwise stipulated herein:

- 1) (§120.1) **Agency** means the Redevelopment Agency of the City of Lodi, California.
- 2) (§120.2) **Project Area** means the territory subject to this Plan, as described in Appendix 'B.'
- 3) (§120.3) **Lodi Community Improvement Project** means the Project under this Plan.
- 4) (§120.4) **City** means the City of Lodi, California.
- 5) (§120.5) **City Council** means the City Council of the City of Lodi, California.
- 6) (§120.6) **County** means the County of San Joaquin, California.
- 7) (§120.7) **CRL** means the Community Redevelopment Law of the State of California (California Health and Safety Code, Sections 33000, et seq.), as from time to time amended.
- 8) (§120.8) **General Plan** means the Lodi General Plan, as it may be from time to time amended.
- 9) (§120.9) **Legal Description** means a description of the land within the Project Area in accordance with map specifications approved by the California State Board of Equalization, and attached hereto as Appendix 'B.'
- 10) (§120.10) **Owner Participation Rules** means the adopted owner participation rules as they may be amended from time to time by the Agency.
- 11) (§120.11) **Person** means any individual or any public or private entity.
- 12) (§120.12) **Persons or Families of Low- or Moderate-Income** means the same as defined by Health and Safety Code Sections 50093 (low and moderate income), 50079.5 (lower income), 50105 (very low income) and 50106 (extremely low income). The County-wide dollar-definition of these incomes is published annually pursuant to Title 25 California Code of Regulations, Section 6932.
- 13) (§120.13) **Personal Property** means all property other than Real Property.

- 14) (§120.14) **Project** means all activities, plans, programs, objectives, goals, and policies involved in this Plan, either directly or by reference.
- 15) (§120.15) **Property** means Real Property and/or Personal Property.
- 16) (§120.16) **Real Property** means land, buildings, structures, fixtures and improvements on the land; property appurtenant to or used in connection with the land; every estate, interest, privilege, easement, franchise, and right in land, including rights-of-way, terms for years, and liens, charges, or encumbrances by way of judgment, mortgage or otherwise, and the indebtedness secured by such liens.
- 17) (§120.17) **Redevelopment Law** means the CRL.
- 18) (§120.18) **Redevelopment Plan** or **Plan** means this document, which, upon adoption by the City Council, shall be officially designated as, “The Plan for the Lodi Community Improvement Project.”
- 19) (§120.19) **Redevelopment Plan Map** means the Community Improvement Plan Map, attached hereto in Appendix ‘A.’
- 20) (§120.20) **State** includes any state agency or instrumentality of the State of California.
- 21) (§120.21) **Zoning Ordinance** means the codes, ordinances and resolutions relating to zoning, land use, and development in the City, as may be from time to time amended.

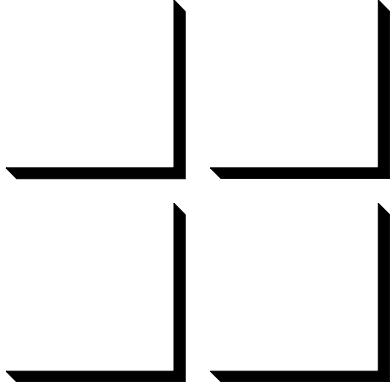
D. (§130) PROJECT AREA BOUNDARIES

The Project Area includes all properties within the boundaries shown on the Community Improvement Plan Map (see Appendix ‘A’), and described in the Legal Description (see Appendix ‘B’).

ö ö ö

This page intentionally left blank

ö ö ö



II. DEVELOPMENT IN THE PROJECT AREA

A. (\$200) PROJECT OBJECTIVES

The Project Area includes a number of conditions that are specified in the CRL as characteristic of blight. Due to the range of these detrimental physical and economic conditions, the Agency must undertake a comprehensive program of activities, including providing needed public improvements, targeted programs and activities to stimulate quality development, financial assistance to promote rehabilitation of existing improvements and structures, and various other activities that would serve existing residents and businesses, and would encourage new private investment. In addition to providing needed public improvements and other assistance, the Agency may assist owners and developers with key in-fill projects through a variety of targeted programs. In doing such, the Agency intends to mitigate the effects of blight in the Project Area.

Vision Statement

Urban Environment

Overriding Goal: Enhance existing business and residential neighborhoods, and encourage new in-fill development as appropriate.

- Encourage development according to the City's General Plan, as it currently exists or may be amended in the future.
- Help preserve and enhance existing conforming residential neighborhoods through landscaping, street and other infrastructure improvements.

- Work with business and property owners to upgrade their properties in the Project Area.
- Rehabilitate deteriorated residential and commercial properties to eliminate safety deficiencies to extend the useful lives of these structures.
- Encourage policies that protect historic structures and ensure historic preservation in the Project Area.
- Work with property owners and businesses to clean up properties that are or have been exposed to hazardous materials.
- Work with property owners to eliminate the negative impacts related to non-conforming land uses.
- Provide for an appropriate buffer to residential neighborhoods from noise, odors, and vibrations for non-residential uses.
- Promote and ensure an environment that is friendly and safe for pedestrians.
- Strengthen pedestrian connections between neighborhoods, and from the Project Area to the rest of the City.

Economic Development

Overriding Goal: Create successful commercial and industrial employment areas to serve local residents, businesses, employees and visitors.

- Develop infrastructure improvements that facilitate private investment in the Project Area.
- Assist economically depressed properties to reverse stagnant or declining property investment through infrastructure improvements and programs.
- Expand opportunities for shopping and services by encouraging the development of new commercial uses that fulfill unmet needs in the community and rehabilitation of existing commercial properties.

- Work with property owners to consolidate parcels to induce new or expanded business development.
- Promote the development of new commercial and industrial opportunities that provide for diverse employment opportunities.
- Provide relocation assistance to businesses and residents in accordance with current law.

Housing Affordability and Quality

Overriding Goal: Establish the Project Area as a community with a high-quality housing stock that includes a variety of housing unit types affordable to a wide range of households.

- Improve the appearance and attractiveness of residential neighborhoods through neighborhood improvement programs, code enforcement efforts, and residential rehabilitation programs.
- Protect the health and general welfare of the Project Area's low- and moderate-income residents by utilizing 20% of the property tax increment revenues to improve, increase and preserve the supply of low- and moderate-income housing.
- Provide replacement housing as required by law if any dwelling units affordable to low- or moderate-income persons or families are lost from the housing supply as a result of Agency activities.
- Provide relocation assistance to businesses and households displaced by Agency activities.
- Provide housing rehabilitation programs to upgrade properties to eliminate blight and adverse code conditions.

Public Infrastructure

Overriding Goal: Improve the Project Area's public infrastructure system to ensure public health, safety and welfare of residents, businesses, and properties

- Provide for improvements to the infrastructure system that cannot be undertaken by a single property owner, but must be improved on an area-wide basis such as drainage improvements, water distribution lines, flood control facilities, and under-grounding of utilities.
- Provide a range of public infrastructure improvements that induce or facilitate private investment such as intersection upgrades, streets, curbs and gutters, sidewalks, street medians, and parking management facilities.
- Work with property owners on the location and timing of improvements to economically assist the repositioning and development of parcels.

Plan Management

Overriding Goal: Ensure that the Lodi Community Improvement Project is managed in the most efficient, effective and economical manner possible.

- Encourage the cooperation and participation of property owners, tenants, residents, public agencies, and community organizations in the elimination of blighting conditions and the promotion of new or improved development in the Project Area.
- Establish programs and activities which assist, complement, and coordinate with public and private development and encourage revitalization and enhancement in the Project Area.
- Oversee the necessary infrastructure improvements in a coordinated and efficient manner.

B. (§210) CONFORMANCE TO GENERAL PLAN

All uses proposed in this Plan shall be in conformance with the General Plan as it now exists, or may be hereafter amended. All requirements of the Zoning Ordinance shall apply to all uses proposed hereunder. All applicable development codes shall apply to all uses in the Project Area.

C. (§220) SPECIFIC DEVELOPMENT OBJECTIVES

Development in the Project Area will be in conformance with this Plan, the General Plan, and the Zoning Ordinance. Development in the Project Area shall also be in conformance with any applicable adopted specific plan or master plan.

The Agency's development objectives involve encouraging the implementation of development in accordance with the General Plan as identified above. In doing so, it is the Agency's intent to provide assistance in the following manner:

- 1) The construction of needed public improvements and facilities including, but not limited to, those described in Section 344 herein.
- 2) The completion of various planning or marketing studies as necessary to facilitate and coordinate a successful redevelopment process.
- 3) All other forms of Agency assistance authorized by the CRL, including, but not limited to, loans, tax exempt financing, or other financial aid programs for new construction and/or rehabilitation.

D. (§230) LAND USES FOR THE PROJECT AREA

In addition to generally identifying the boundaries of the Project Area, the Community Improvement Plan Map (Appendix A) also generally illustrates the proposed public rights-of-way, public easements, open space, and proposed land uses to be permitted in the Project Area, all of which are consistent with the General Plan as it exists as of the date of the adoption of this Plan.

Pending the ultimate development of land in accordance with the provisions of this Plan, the Agency is authorized to use or permit the use of any land in the Project Area for interim uses not in conformity with the uses permitted in this Plan, provided that approval of any such interim uses shall be subject to compliance with provisions of the Zoning Ordinance.

If the General Plan is amended in the future, as it applies to the Project Area, this Plan shall be deemed amended to conform to the General Plan as so amended.

E. (§240) PUBLIC USES FOR THE PROJECT AREA

1. (§241) PUBLIC STREET LAYOUT, RIGHTS-OF-WAY AND EASEMENTS

The public rights-of-way, easements, and principal streets proposed or existing in the Project Area are the same as those indicated in the General Plan, and are shown on the attached Community Improvement Map (Appendix A).

Such streets and rights-of-way may be widened, altered, realigned, abandoned, vacated, or closed by the Agency and the City as appropriate given ownership, and necessary for proper development of the Project. The Agency and the City may create additional public streets, alleys, and easements in the Project Area as needed for proper circulation. The Agency and the City will work with Caltrans to make improvements on state highways in the Project Area.

The public rights-of-way shall be used for vehicular, bicycle and pedestrian traffic as well as for public improvements, public and private utilities, and activities typically found in public rights-of-way. In addition, all necessary easements for public uses, public facilities, and public utilities may be retained and created.

2. (§242) OPEN SPACE, PUBLIC AND QUASI-PUBLIC USES, AND FACILITIES

In any portion of the Project Area, the Agency is authorized to permit the establishment or enlargement of public, semi-public, institutional, or nonprofit uses. All such uses shall conform, so far as possible, with the provisions of this Plan applicable to the uses in the specific area involved, and shall conform to the General Plan.

F. (§250) GENERAL DEVELOPMENT REQUIREMENTS

1. (§251) OPEN SPACE AND STREET LAYOUT TO BE PROVIDED

Open space and street layout is shown in the Community Improvement Map included herewith in Appendix A and described in Section 241 of this Plan. Addi-

tional open space will be provided through application of City standards for building setbacks.

2. (\$252) LIMITATIONS ON TYPE, SIZE, HEIGHT, NUMBER, AND PROPOSED USE OF BUILDINGS

The type, size, height, number, and proposed use of buildings shall be limited by the applicable federal, state, and local statutes, ordinances, regulations, General Plan, Zoning Ordinance, and any requirements that may be adopted pursuant to this Plan. Permitted land uses are indicated on the Community Improvement Map in Appendix A.

3. (\$253) THE APPROXIMATE NUMBER OF DWELLING UNITS

Under the General Plan, approximately 4,500 dwelling units (including existing dwellings) would be permitted in the Project Area at the expiration of this Plan. These uses are limited as indicated on the Community Improvement Map in Appendix A and must conform with the General Plan and Zoning Ordinance.

4. (\$254) THE PROPERTY TO BE DEVOTED TO PUBLIC PURPOSES AND THE NATURE OF SUCH PURPOSES

The locations of public uses are shown in the Community Improvement Map in Appendix A. Other public uses are described in Section 251 of this Plan and specific public improvements/facilities are listed in Section 344. These improvements are generally expected to be provided in the public right-of-way or on land specifically acquired by the City or Agency for such purposes. Additional public facilities may be developed by the County, by special districts, by school districts, and by other public agencies operating within the Project Area.

5. (\$255) CONFORMANCE WITH THIS PLAN

All Real Property in the Project Area is hereby made subject to the controls and requirements of this Plan. No Real Property shall be developed, rehabilitated, or otherwise changed after the date of the adoption of this Plan unless it is in conformance with the provisions of the General Plan, of the Zoning Ordinance,

and of this Plan and all applicable provisions of State law.

6. (§256) REHABILITATION AND RETENTION OF PROPERTIES

To the greatest extent permitted by law, any existing structure within the Project Area specifically may be repaired, altered, reconstructed, or rehabilitated to ensure that such structure will be safe and sound in all physical respects and not detrimental to the surrounding uses. Such repair, alteration, reconstruction or rehabilitation shall be conducted according to City procedures and guidelines.

7. (§257) SUBDIVISION OR CONSOLIDATION OF PARCELS

No parcels in the Project Area, including any parcels retained by a participant, shall be subdivided or consolidated without approval of the City.

G. (§260) DEVELOPMENT PROCEDURES

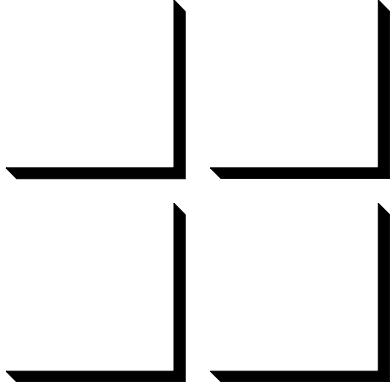
Applications for development and building permits and the review thereof shall follow City procedures.

1. (§261) REVIEW OF APPLICATIONS FOR BUILDING PERMITS

Applications for building permits and the review thereof shall follow City procedures.

2. (§262) EXISTING NONCONFORMING USES

Existing non-conforming uses are allowed to remain as provided in the Lodi Municipal Code.



III. REDEVELOPMENT IMPLEMENTATION

A. (§300) GENERAL

The Agency is authorized to undertake the following implementation actions, but in no event may use the power of eminent domain in any manner or purpose:

- 1) (§301) Provide for participation by owners and tenants of properties located in the Project Area by extending opportunities to remain or relocate within the Project Area;
- 2) (§302) Acquisition of Real Property, and management of property under the ownership and control of the Agency;
- 3) (§303) Relocation assistance to displaced Project occupants;
- 4) (§304) Demolition or removal of buildings and improvements;
- 5) (§305) Installation, construction, or reconstruction of streets, utilities, open spaces and other public improvements and facilities;
- 6) (§306) Rehabilitation, development, or construction of low- and moderate-income housing within the City;
- 7) (§307) Disposition of property for uses in accordance with this Plan;
- 8) (§308) Redevelopment of land by private enterprise and public agencies for uses in accordance with this Plan;
- 9) (§309) Rehabilitation of structures and improvements by present owners, their successors, or the Agency; and,
- 10) (§310) Any other redevelopment agency activity permitted by the CRL.

B. (§311) PARTICIPATION BY OWNERS AND TENANTS

1. (§312) PARTICIPATION OPPORTUNITIES FOR OWNERS

Persons who are owners of business and other types of Real Property in the Project Area shall be given an opportunity to participate in redevelopment as more particularly set forth in the Owner Participation Rules (adopted April 16, 2008, by Agency Resolution ****).

2. (§313) RE-ENTRY PREFERENCES; PREFERENCES FOR TENANTS

The Agency shall extend reasonable preferences to persons who are engaged in business in the Project Area to re-enter in business within the Project Area, if they otherwise meet the requirements prescribed in this Plan. Business, institutional and semi-public tenants may, if they so desire, purchase and develop Real Property in the Project Area if they otherwise meet the requirements prescribed in this Plan, all as more particularly set forth in the Owner Participation Rules.

3. (§314) PARTICIPATION AGREEMENTS

At the Agency's option, each participant who chooses to participate in the development of property pursuant to adopted Owner Participation Rules, may be required to enter into a binding agreement with the Agency by which the participant agrees to develop, rehabilitate, or use the Participant's and/or other Property in conformance with this Plan and be subject to the provisions in the participation agreement. In such agreements, participants who retain Property shall be required to join in the recordation of such documents as are necessary to make the provisions of the agreement applicable to their properties.

Whether or not a participant enters into a participation agreement with the Agency, the provisions of this Plan are applicable to all public and private property in the Project Area.

C. (§320) PROPERTY ACQUISITION AND MANAGEMENT

1. (§321) ACQUISITION OF REAL PROPERTY

The Agency may but is not required to, acquire any Real Property and/or Personal Property, any interest in Real Property and/or Personal Property, any improvements on Real Property by gifts, grant, bequest, devise, exchange, purchase or any other means authorized by law, but expressly excluding the use by the Agency of eminent domain. This Plan and the Agency's program for the acquisition of Property (to the extent said program is required by law) does not provide for the Agency to have the power of eminent domain.

The Agency shall not acquire any property or interest in property from any of its members or officers. The Agency shall not acquire property of a public agency without its consent.

2. (§322) PROPERTY MANAGEMENT

During such time as property, if any, in the Project Area is owned by the Agency, such property shall be under the management and control of the Agency. Such property may be maintained, managed, operated, repaired, cleaned, rented, or leased to an individual, family, business, or other appropriate entity by the Agency pending its disposition for redevelopment. The Agency may insure or provide for the insurance of any real Property of the Agency and provide for the insurance of any operations of the Agency against risk of hazards. All such acts shall be pursuant to such policies as the Agency may adopt.

The Agency shall maintain all Agency-owned property that is not to be demolished in a reasonably safe and sanitary condition. Furthermore, the Agency may insure against risks or hazards any of the real or personal property which it owns.

The Agency is authorized to own and operate rental property acquired and rehabilitated in prospects of resale to the greatest extent permitted by law.

D. (§330) RELOCATION OF PERSONS, FAMILIES AND BUSINESSES

Provisions relative to the relocation of persons, families and businesses are required by the CRL. The Agency prepared and adopted a feasible method for relocation, as required by law. The relocation method, called “Method of Relocation for the Lodi Community Improvement Project”, outlines the responsibilities of the Agency regarding relocation as a result of the implementation of this Plan.

E. (§340) DEMOLITION, CLEARANCE, SITE PREPARATION, PROJECT IMPROVEMENTS AND PUBLIC IMPROVEMENTS

The following provisions relative to demolition, clearance and site preparation are required by the CRL.

1. (§341) DEMOLITION AND CLEARANCE

Subject to and in conformance with law, the Agency is authorized to demolish and clear or move, or cause to be demolished and cleared or moved, buildings, structures, and other improvements from any Real Property in the Project Area as necessary to carry out the purposes of this Plan.

2. (§342) BUILDING SITE PREPARATION

Subject to and in conformance with law, the Agency is authorized to prepare, or cause to be prepared as building sites, any Real Property in the Project Area.

3. (§343) PROJECT IMPROVEMENTS

Pursuant to the CRL, the Agency is authorized to install and construct, or to cause to be installed and constructed, Project improvements and public utilities necessary to carry out this Plan. Such improvements include, but are not limited to, streets, curbs, gutters, street lights, sewers, storm drains, flood control improvements, traffic signals, electrical distribution systems, transportation facilities, natural gas distribution systems, water distribution systems, or overpasses, underpasses, bridges, and landscaped areas.

4. (§344) PUBLIC IMPROVEMENTS AND IMPLEMENTATION PROGRAMS

As provided under CRL Section 33445 and as may be otherwise permitted by law, the Agency may, with the consent and cooperation of the City Council and adoption of certain findings specified in CRL Section 33445, pay all or part of the value of the land for, and the cost of the installation and construction of, any buildings, facilities, structures or other improvements which are publicly owned, including school facilities, either outside or inside the Project Area.

Without limiting its general authority, the Agency is specifically authorized to provide or participate in providing the improvements described in Section 343, as well as the public improvements, facilities, and programs listed below:

Commercial Corridor Improvement Program

The Agency intends to fund improvements designed to strengthen the major commercial corridors in the Project Area. Improvements will focus on the following major commercial corridors:

- Lodi Avenue
- Cherokee Lane
- Kettleman Lane
- Lockeford Street
- Pine Street
- Victor Road
- Central Avenue
- Main Street

Improvements that are needed along these major commercial corridors include:

- Water, sewer and storm drains
- Undergrounding of utilities
- Pedestrian improvements
- Streetscape improvements
- The reconstruction of streets
- Billboard removal
- Improved signage
- Graffiti abatement programs/funding
- Capital facilities that help reduce crime
- Streetscape improvements along the major corridors of the Project Area, including the installation of

street trees, landscaped medians, entry way signs, new signage and the removal of billboards.

Also as a part of the Commercial Corridor Improvement Program, the Agency intends to implement a commercial rehabilitation program. This program would focus on providing loans and grants for the rehabilitation of existing commercial and industrial buildings. The Agency also intends to promote and encourage sustainable development and reduce energy consumption in its programs and projects.

Neighborhood Improvement Program

The Agency intends to fund improvements designed to upgrade and strengthen the residential areas of the Project Area. Improvements to include:

- Water, sewer and storm drains
- Installation of water meters
- Undergrounding of utilities
- Pedestrian improvements
- Soundwalls
- Alley improvements
- Sidewalk, curb and gutters
- ADA accessibility improvements
- Promotion and encouragement of sustainable development and reduction of energy consumption

Economic Development Programs

The Agency intends to encourage new commercial and industrial development in the Project Area through this program. Under this program, the Agency can enter into public private partnerships by assisting with land assembly, site preparation, offsite improvements, disposition of property, hazardous waste remediation and relocation assistance to existing property owners and tenants. The Agency may also acquire property (but not through eminent domain) and resell it to developers at the reuse value of the property. Another component of this program will include assistance to existing businesses as a means to retain them in the proposed Project Area.

The Agency may also assist existing and future businesses through the payment of development impact fees, assessments and mitigations to the extent permitted by law.

This program will most likely be focused on those areas where significant deterioration and dilapidation exist. This includes the major commercial corridors of the City that were described under the Commercial Corridor Improvement Program. Priorities may also be established based upon the willingness of private parties to invest private capital.

Community Facilities and Improvement Programs

One of the major physical blighting conditions is the existence of contaminated groundwater plumes. Through this program, the Agency intends to assist in the remediation of these toxic sites.

The following types of community facilities also may be constructed in the Project Area:

- Parks, stadium and other recreation
- Libraries
- Public safety facilities, including police and fire facilities
- Animal shelter
- Green development enhancements at existing and future facilities
- Other facilities as needed

Housing Programs

The Housing Program implements one of the major goals of the CRL, which is to increase, improve, and preserve low- and moderate-income housing. The Agency intends to implement the following types of projects:

- First time homebuyers down payment assistance program
- Housing Rehab Loan Program
- Senior Housing
- Workforce Housing Development

ADDITIONAL FACILITIES OR IMPROVEMENTS

Changes in circumstances or designs may alter the location of the facilities described above, or may require

other related facilities. The financing of such related facilities shall be deemed authorized by the Agency.

The Agency will be authorized to finance the construction of additional improvements in the Project Area based on the requirements of any future project environmental impact report, or any other State, regional or local regulatory program. These items may include, but are not limited to, travel demand management strategies, storm water runoff prevention and best management practices, and Federal Emergency Management Agency regulations.

5. (§345) TEMPORARY PUBLIC IMPROVEMENTS

The Agency is authorized to install and construct, or cause to be installed and constructed, temporary public improvements and temporary public utilities necessary to carry out this Plan. Such temporary public improvements shall include, but not be limited to, streets, public facilities and utilities. Temporary utilities may be installed above ground.

F. (§350) REHABILITATION AND CONSERVATION OF STRUCTURES

1. (§351) REHABILITATION OF STRUCTURES

The Agency is authorized to rehabilitate and conserve, or to cause to be rehabilitated and conserved, any building or structure in the Project Area owned by the Agency. The Agency is also authorized and directed to advise, encourage, and financially assist in the rehabilitation and conservation of property in the Project Area not owned by the Agency.

The Agency and the City may conduct a rehabilitation program to encourage owners of property within the Project Area to upgrade and maintain their property consistent with City codes, ordinances and standards. The Agency and the City may develop a program for making low interest loans or other incentives for the rehabilitation of properties in the Project Area. Properties may be rehabilitated, provided that rehabilitation and conservation activities on a structure are carried out in an expeditious manner and in conformance with this Plan.

2. (§352) MOVING OF STRUCTURES

As is necessary in carrying out this Plan and where it is economically feasible to so do, the Agency is authorized to move, or cause to be moved, any standard structure or building, which can be rehabilitated, to a location within or outside the Project Area.

3. (§353) BUILDINGS OF HISTORICAL SIGNIFICANCE

To the maximum feasible extent, special consideration shall be given to the protection, rehabilitation, or restoration of any structure determined to be historically significant, taking into consideration applicable City guidelines. The Agency may fund a historic survey in the project area to identify structures that are historically significant and could work with the City to modify the historic resources inventory. The Agency may develop programs to assist with historic preservation of significant structures.

G. (§360) REAL PROPERTY DISPOSITION AND DEVELOPMENT

1. (§361) GENERAL REQUIREMENTS

For the purpose of this Plan, and to the extent permitted by and in the manner required by law, the Agency is authorized to sell, lease, exchange, subdivide, transfer, assign, pledge, encumber by mortgage or deed of trust, or otherwise dispose of any interest in Property.

In the manner required and to the extent permitted by law, before any interest in Property of the Agency acquired in whole or in part, directly or indirectly, with tax increment monies is sold or leased, for development pursuant to this Plan, such sale, lease, or disposition shall first be approved by the City Council after public hearing.

Purchasers or lessees of Agency-owned property in the Project Area shall be obligated to use the property for the purposes designated in this Plan, to begin and complete development of the property within a period of time which the Agency fixes as reasonable, and to comply with other conditions which the Agency deems necessary to carry out the purposes of this Plan.

To the extent permitted and in the manner required by law, the Agency is authorized to dispose of Real Property by leases or sales by negotiation without public bidding. Property may be conveyed by the Agency to the City or any other public body without charge.

2. (§362) DISPOSITION AND DEVELOPMENT DOCUMENTS

- 1) To provide adequate safeguards ensuring that the provisions of this Plan will be carried out and to prevent the recurrence of blight, all Real Property sold, leased, or conveyed by the Agency shall be made subject to the provisions of this Plan by lease, deeds, contracts, agreements, declarations, or other lawful means. Where determined appropriate by the Agency, such documents or portions thereof shall be recorded in the Office of the Recorder of the County.
- 2) The leases, deeds, contracts, agreements, and declarations of restrictions may contain restrictions, covenants running with the land, conditions subsequent, equitable servitudes, or any other provision necessary to carry out this Plan.
- 3) In accordance with CRL Sections 33337 and 33436, all deeds, leases or contracts for the sale, lease, sublease, transfer, use occupancy, tenure or enjoyment of Real Property in the Project Area which the Agency proposes to enter into shall contain the following provisions and nondiscrimination clauses in substantially the following form:

- (a) In deeds the following language shall appear:

“The grantee herein covenants by and for himself or herself, his or her heirs, executors, administrators, and assigns, and all persons claiming under or through them, that there shall be no discrimination against or segregation of, any person or group of persons on account of any basis listed in subdivision (a) or (d) of Section 12955 of the Government Code, as those bases are defined in Sections 12926, 12926.1, subdivision (m) and paragraph (1) of subdivision (p) of Section 12955, and Section 12955.2 of the Government Code, in the sale, lease, sublease, transfer, use, occupancy, ten-

ure, or enjoyment of the premises herein conveyed, nor shall the grantee or any person claiming under or through him or her, establish or permit any such practice or practices of discrimination or segregation with reference to the selection, location, number, use or occupancy of tenants, lessees, subtenants, sublessees, or vendees in the premises herein conveyed. The foregoing covenants shall run with the land.”

- (b) In leases the following language shall appear:

“The lessee herein covenants by and for himself or herself, his or her heirs, executors, administrators, and assigns, and all persons claiming under or through him or her, and this lease is made and accepted upon and subject to the following conditions:

That there shall be no discrimination against or segregation of any person or group of persons, on account of any basis listed in subdivision (a) or (d) of Section 12955 of the Government Code, as those bases are defined in Sections 12926, 12926.1, subdivision (m) and paragraph (1) of subdivision (p) of Section 12955, and Section 12955.2 of the Government Code, in the leasing, subleasing, transferring, use, occupancy, tenure, or enjoyment of the premises herein leased nor shall the lessee himself, or any person claiming under or through him or her, establish or permit any such practice or practices of discrimination or segregation with reference to the selection, location, number, use, or occupancy, of tenants, lessees, sublessees, subtenants, or vendees in the premises herein leased.”

- (c) In contracts entered into by the agency relating to the sale, transfer, or leasing of land or any interest therein acquired by the agency within any survey area or redevelopment project the foregoing provisions in substantially the forms set forth shall be included and the contracts shall further provide that the foregoing provisions shall be binding upon and shall obligate the contracting party or parties and any subcontracting party or parties, or other transferees under the instrument.

3. (§363) DESIGN FOR DEVELOPMENT

In the case of property which is the subject of a disposition and development or participation agreement with the Agency, it shall be constructed in accordance with architectural, landscape, signage, lighting, and site plans submitted to and approved in writing by the Agency and by the City pursuant the General Plan, the Zoning Ordinance, appropriate City-adopted design guidelines, and other applicable Lodi Municipal Code requirements. One of the objectives of this Plan is to create an attractive and pleasant environment in the Project Area. Therefore, such plans shall give consideration to good design, open space, and other amenities to enhance the aesthetic quality of the Project Area in accordance with the goals and objectives of this Plan. The Agency will not approve any plans that do not comply with this Plan.

4. (§364) INDUSTRIAL AND MANUFACTURING PROPERTY

To the extent now or hereafter permitted by law, the Agency may, as part of an agreement that provides for the development or rehabilitation of property within the Project Area that will be used for industrial or manufacturing purposes, assist with the financing of facilities or capital equipment including, but not necessarily limited to, pollution control devices. Prior to entering into an agreement for a development that will be assisted pursuant to this Section, the Agency shall find, after a public hearing, that the assistance is necessary for the economic feasibility of the development and that the assistance cannot be obtained on economically feasible terms in the private market.

5. (§365) PERSONAL PROPERTY DISPOSITION

For purposes of this Plan, the Agency is authorized to sell, lease, exchange, transfer, assign, pledge, encumber, or otherwise dispose of personal property that has been acquired by the Agency.

H. (§370) OTHER AGENCY ACTIVITIES

1. (§371) HAZARDOUS WASTE REMEDIATION AND REMOVAL

The Agency may take any actions which it determines are necessary and which are consistent with other state and federal laws to remedy or remove hazardous waste on, under or from property in the Project Area in accordance with the requirements of Health and Safety Code Section 33459 - 33459.8, or any successor legislation.

2. (§372) SEISMIC RETROFITS

For any rehabilitation project, the Agency may take any action it determines necessary and consistent with local, state and federal law to provide for seismic retrofits as provided in Health and Safety Code Section 33420.1 and any successor statute.

3. (§373) GRAFFITI REMOVAL

The Agency may take such actions as it determines are necessary to remove graffiti from public and private property in the Project Area pursuant to Health and Safety Code Section 33420.2 and any successor statute.

4. (§374) COMMERCIAL REHABILITATION

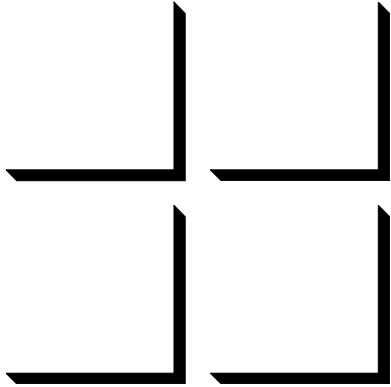
The Agency may establish a program under which it lends funds to owners or tenants for the purpose of rehabilitating commercial buildings or structures within the Project Area pursuant to Health and Safety Code Section 33444.5 and any successor statute.

5. (§375) ASSISTANCE FOR INDUSTRIAL AND MANUFACTURING USES

The Agency may assist in financing of facilities or capital equipment, including, but not necessarily limited to pollution control devices, for properties being developed or rehabilitated for industrial or manufacturing uses within the Project Area pursuant to Health and Safety Code Section 33444.6 and any successor statute.

6. (§376) REHABILITATION AND MOVING OF BUILDINGS

To the extent appropriate in carrying out the Plan, the Agency is authorized to: (a) rehabilitate or cause to be rehabilitated any building or structure in the Project Area acquired by the Agency; and (b) move or cause to be moved any building or other structure to a location within or outside the Project Area.



IV. LOW- AND MODERATE-INCOME HOUSING

A. (\$400) 20% TAX INCREMENT FUNDS REQUIREMENT

Except as otherwise allowed by law, not less than twenty percent (20%) of all taxes allocated to the Agency pursuant to CRL Section 33670 shall be used by the Agency for the purposes of increasing, improving, and preserving the City's supply of housing for persons and families of low- or moderate-income.

B. (\$410) LOW- AND MODERATE-INCOME HOUSING AND REPLACEMENT

Except as otherwise allowed by law, the Agency shall provide for affordable housing in compliance with all applicable provisions of the CRL, including but not limited to CRL Sections 33334.2 et seq., 33413 and 33413.5.

As stated in Section 321 of this Plan, the Agency is not authorized to use eminent domain. However, in carrying out the activities set forth in this Plan, it may become necessary for the Agency to enter into various agreements, such as an agreement for acquisition of Property, an agreement for the disposition and development of property, or an owner participation agreement, which would lead to the destruction or removal of dwelling units from the low- and moderate-income housing market. Except as otherwise allowed by law, not less than thirty (30) days prior to the execution of such an agreement, the Agency shall adopt, by a resolution and to the extent provided by the CRL, a Re-

placement Housing Plan, which shall include the general location of the replacement housing, an adequate means of financing the replacement housing, a finding that the replacement housing does not require the approval of the voters pursuant to Article XXXIV of the California Constitution or that such approval has been obtained, the number of dwelling units housing persons or families of low- or moderate-income planned for construction or rehabilitation, and a timetable for meeting the Plan's relocation or rehabilitation housing objectives, or as the CRL may otherwise provide. To the extent required by law, a dwelling unit whose replacement is required by CRL Section 33413, but for which no Replacement Housing Plan has been prepared, shall not be removed from the low- and moderate-income housing market.

For a reasonable period of time prior to adopting a Replacement Housing Plan, the Agency shall make available a draft of the proposed plan for review and comments by other public agencies and the general public.

To the extent required by CRL Section 33413, whenever dwelling units housing persons and families of low- or moderate-income are destroyed or removed from the low- and moderate-income housing market as part of a redevelopment project which is subject to a written agreement with the Agency or where financial assistance has been provided by the Agency, the Agency shall, within four years of such destruction or removal, rehabilitate, develop, price restrict, or construct, or cause to be rehabilitated, developed, price restricted, or constructed for rental or sale to persons and families of low- or moderate-income, an equal number of replacement dwelling units which have an equal or greater number of bedrooms as those destroyed or removed units at affordable housing costs within the territorial jurisdiction of the Agency. All of the replacement dwelling units shall be available at affordable housing costs to persons in the same or a lower income category (low, very low, or moderate) as the persons displaced from those destroyed or removed units.

C. (§420) PROVISION OF LOW- AND MODERATE-INCOME HOUSING

The Agency may, to the extent permitted by law and land use designations, inside or outside the Project Area, acquire land, sell or lease land, donate land, improve sites, price re-

strict units, construct or rehabilitate structures, or use any other method authorized by the CRL in order to provide housing for persons and families of low or moderate income. The Agency may also provide subsidies to, or for the benefit of, such persons and families or households to assist them in obtaining housing within the City.

D. (§430) NEW OR REHABILITATED DWELLING UNITS DEVELOPED WITHIN THE PROJECT AREA

To the extent required by CRL Section 33413, at least thirty percent (30%) of all new and substantially rehabilitated dwelling units developed within the Project Area by the Agency shall be for persons and families of low- and moderate-income; and of such thirty percent (30%), not less than fifty percent (50%) thereof shall be for very low-income households.

To the extent required by the CRL, at least fifteen percent (15%) of all new and substantially rehabilitated units developed within the Project Area by public or private entities or persons other than the Agency shall be for persons and families of low- and moderate-income; and of such fifteen percent (15%), not less than forty percent (40%) thereof shall be for very low-income households. To satisfy this provision, in whole or in part, the Agency may cause by regulation or agreement, to be available, at affordable housing costs, to persons and families of low or moderate-income or to very low-income households, as applicable, two units outside the Project Area for each unit that otherwise would have had to be available inside the Project Area. Also, in order to satisfy this provision, the Agency may aggregate new or substantially rehabilitated dwelling units in one or more redevelopment project areas, or may purchase long-term affordability covenants in existing housing whether or not in the Project Area. The Agency may also satisfy this provision by any other means permitted by law.

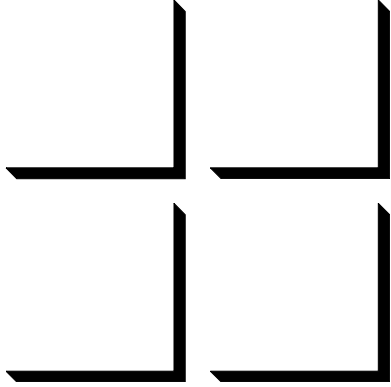
The percentage requirements set forth in this Section shall apply in the aggregate to housing in the Project Area and not to each individual case of rehabilitation, development, price restriction, or construction of dwelling units.

The Agency shall require, by contract or other appropriate means, that whenever any low- and moderate-income housing units are developed within the Project Area, such units shall be made available on a priority basis for rent or pur-

chase, whichever the case may be, first to persons and families of low- and moderate-income displaced by the Project, and, second, to persons and families of low- and moderate-income who have been resident in the Project Area for at least 30 days prior to such units being made available; provided, however, that failure to give such priority shall not affect the validity of title to the Real Property upon which such housing units have been developed.

E. (§440) LAST RESORT HOUSING

If sufficient suitable housing units are not available for use by persons and families of low- and moderate-income displaced by the Project, the Agency may, to the extent of that deficiency, direct or cause the development or rehabilitation of low- and moderate-income housing units within the City, both inside and outside of the Project Area.



V. PROJECT FINANCING

A. (\$500) GENERAL DESCRIPTION OF THE PROPOSED FINANCING METHOD

Upon adoption of this Plan by the City Council, the Agency is authorized to finance implementation of the Project with property tax increments, interest income, Agency bonds, loans from private institutions, proceeds from the sale or lease of property, financial assistance, including grants and loans, from the City, County, state of California, Federal Government, or any other public agency, or any other legally available source. The City may, in accordance with the law, make advances and expend money as necessary to assist the Agency in carrying out this Project. Such assistance shall be on terms established by any agreement between the City and the Agency.

The Agency is authorized to issue bonds from time to time if appropriate and feasible in an amount sufficient to finance implementation of all or any part of the Project. Neither the members of the Agency nor any persons executing the bonds are liable personally on the bonds or other obligations by reason of their issuance. The bonds and other obligations of the Agency are not a debt of the City, nor the State, nor are any of its political subdivisions liable for them, nor in any event shall the bonds or obligations be payable out of any funds or properties other than those of the Agency; such bonds and other obligations shall so state on their face. The bonds and other obligations do not constitute indebtedness within the meaning of any constitutional or statutory debt limitation or restriction.

The Agency is authorized to obtain advances, borrow funds and create indebtedness in carrying out this Plan. The

principal and interest on such advances, funds, and indebtedness maybe paid from tax increments or any other funds available to the Agency.

B. (§510) TAX INCREMENTS

For the period specified in §540 below, all taxes levied upon taxable property within the Project Area each year by or for the benefit of the State of California, County of San Joaquin, City of Lodi, any district, or other public corporation (hereinafter sometimes called “taxing agencies”) after the effective date of the ordinance approving this Plan, or any amendment thereto, shall be divided as follows:

- 1) That portion of the taxes which would be produced by the rate upon which the tax is levied each year by or for each of said taxing agencies upon the total sum of the assessed value of the taxable property in the Project Area as shown upon the assessment roll used in connection with the taxation of such property by such taxing agency, last equalized prior to the effective date of such ordinance, shall be allocated to and when collected shall be paid into the funds for the respective taxing agencies as taxes by or for said taxing agencies on all other property are paid (for the purpose of allocating taxes levied by or for any taxing agency or agencies which did not include the territory of the Project Area on the effective date of such ordinance but to which such territory is annexed or otherwise included after such effective date, the assessment roll of the County of San Joaquin last equalized on the effective date of said ordinance shall be used in determining the assessed valuation of the taxable property in the Project Area on said effective date); and,
- 2) Except as provided in paragraphs (3) and (4) below, that portion of the levied taxes each year in excess of such amount shall be allocated to and when collected shall be paid into a special fund of the Agency to pay the principal of and interest on loans, moneys advanced to, or indebtedness (whether funded, refunded, assumed or otherwise) incurred by the Agency to finance or refinance, in whole or in part, this Project. Unless and until the total assessed value of the taxable property in the Project Area exceeds the total assessed value of the taxable property in the Project Area, as shown by the last equalized assessment roll referred to in paragraph (1) above, all of the taxes levied and collected upon the taxable property in the Project Area shall be paid to the respec-

tive taxing agencies. When said loans, advances and indebtedness, if any, and interest thereon, have been paid, all moneys thereafter received from taxes upon the taxable property in the Project Area shall be paid into the funds of the respective taxing agencies as taxes on all other property are paid; and,

- 3) That portion of the taxes identified in paragraph (1) above, which are attributable to a tax rate levied by any of said taxing agencies for the purpose of providing revenues in an amount sufficient to make annual repayments of the principal of, and the interest on, any bonded indebtedness for the acquisition or improvement of Real Property shall be allocated to, and when collected shall be paid into, the fund of that taxing agency. This paragraph (3) shall only apply to taxes levied to repay bonded indebtedness approved by the voters of said taxing agency or agencies on or after January 1, 1989.
- 4) That portion of tax revenues allocated to the Agency pursuant to paragraph (2) above which is attributable to increases in the rate of tax imposed for the benefit of any affected taxing agency whose levy occurs after the tax year in which the ordinance adopting this Plan becomes effective, shall be allocated to such affected taxing agency to the extent the affected taxing agency has elected in the manner required by law to receive such allocation.

The Agency is authorized to make such pledges as to specific advances, loans and indebtedness as appropriate in carrying out the Project. Taxes shall be allocated and paid to the Agency consistent with the provisions of this Plan only to pay the principal of and interest on loans, moneys advanced to, or indebtedness (whether funded, refunded, assumed or otherwise) incurred by the Agency to finance or refinance, in whole or in part, the Project.

C. (§520) ISSUANCE OF BONDS AND NOTES

The Agency may issue bonds or notes when a determination has been made that such financing is required and feasible.

D. (§530) LOANS AND GRANTS

The Agency is authorized to obtain advances, borrow funds, and create indebtedness in carrying out this Plan. The principal and interest on such advance funds and indebted-

ness may be paid from tax increments or any other funds available to the Agency.

E. (§540) FINANCING LIMITATIONS

Consistent with CRL Sections 33333.2 and 33334.1, the following financing limitations are imposed on this Plan:

- 1.) From time to time as may be appropriate, the Agency may issue bonds and/or notes for any of its corporate purposes. The Agency may issue such types of bonds on which the principal and interest are payable in whole or in part from tax increments collected pursuant to CRL Section 33670. The total outstanding principal of any bonds so issued and repayable from said tax increment from the Project Area shall not exceed Four Hundred Million Dollars (\$400,000,000) at any one time, except by further amendment of this Plan.
- 2.) No loans, advances, or indebtedness to finance, in whole or in part, this Project and to be repaid from the allocation of taxes described in the aforementioned Section 33670 shall be established or incurred by the Agency beyond twenty (20) years from the adoption date of the ordinance approving this Plan. This time limit shall not prevent the Agency from incurring debt or as permitted by CRL Section 33333.2, Section 33333.8 or any other provisions of law.
- 3.) The limits set forth above shall not prevent the Agency from refinancing, refunding or restructuring indebtedness after the time limit if the indebtedness is not increased and the time during which the indebtedness is to be repaid is not extended beyond the time to repay indebtedness as set forth in subsection (7) below, or as otherwise permitted by law
- 4.) Unless otherwise permitted by law, the time limitation established 2)above may be extended only by amendment of this Plan after the Agency finds, based on substantial evidence, that (i) significant blight remains within the Project Area, and (ii) this blight cannot be eliminated without the establishment of additional debt. However, unless otherwise permitted by law, this amended time limitation may not exceed 30 years from the effective date of the ordinance approving and adopt-

ing this Plan except as necessary to comply with subsection (a) of CCRL Section 3333.8.

- 5.) The Agency shall not pay indebtedness or receive property taxes pursuant to CRL Section 33670 and Section §510 of this Plan beyond forty-five (45) years from the date of adoption of the ordinance approving this Plan or such longer period as permitted by CRL Section 33333.2 or any other provision of law.

F. (\$550) LOW- AND MODERATE-INCOME HOUSING FUND

Taxes which are allocated by the Agency to low- and moderate-income housing pursuant to Part IV of this Plan shall be held in a separate low-and moderate-income housing fund to the extent provided under CRL Sections 33334.2 and 33334.3.

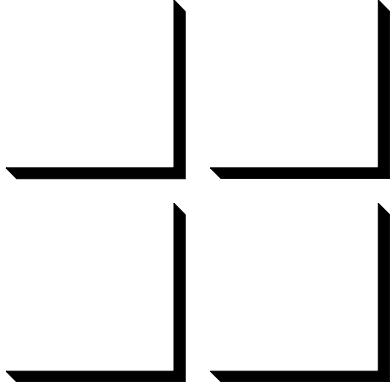
G. (\$560) PAYMENTS TO TAXING AGENCIES

The Agency shall make payments to affected taxing agencies with territory located within the Project Area to the extent required by CRL Section 33607.5 and may make other payments to affected taxing agencies if and to the extent authorized by the CRL at the discretion of the Agency.

ö ö ö

This page intentionally left blank

ö ö ö



VI. ADMINISTRATION

A. (§600) ADMINISTRATION AND ENFORCEMENT OF THIS PLAN

The administration, implementation, and enforcement of this Plan, including the preparation and execution of any documents implementing this Plan, shall be performed by the Agency and/or the City in accordance with all applicable provisions of the CRL as well as with any applicable state or local law, ordinance, policy or plan.

The provisions of this Plan, or other documents entered into pursuant to this Plan, may also be enforced by court litigation instituted by either the Agency or the City. Such remedies may include, but are not limited to, specific performance, damages, re-entry, injunctions, or any other available legal or equitable remedies.

All provisions of the CRL as may be required to be included in a redevelopment plan are hereby incorporated as if fully set forth herein.

B. (§610) DURATION OF THIS PLAN'S DEVELOPMENT CONTROLS

Pursuant to CRL Section 33333.2, the effectiveness of this Plan shall terminate at a date which shall not exceed thirty (30) years from the date of adoption of the ordinance approving this Plan. After the time limit on the effectiveness of this Plan, the Agency shall have no authority to act pursuant to this Plan, except to pay previously incurred indebtedness, to enforce existing covenants or contracts, in-

cluding nondiscrimination and nonsegregation provisions, which shall run in perpetuity, to complete its housing obligations in accordance with CRL Sections 33333.2 and 33333.8, and to take any other action permitted by law.

C. (§620) PROCEDURE FOR PLAN AMENDMENT

This Plan may be amended by means of the procedure established in CRL Sections 33450 through 33458, or by any other procedure established by law. Necessarily, some of the statements in this Plan are general and tentative in nature; formal amendment of this Plan is not required for subsequent implementation and administrative interpretation consistent with this Plan.

D. (§630) AGENCY/CITY COOPERATION

Subject to any limitation in law, the City will aid and cooperate with the Agency in carrying out this Plan and may take any further action necessary to ensure the continued fulfillment of the purposes of this Plan and to prevent the recurrence or spread of blight, or those conditions which caused the blight in the Project Area; provided that any City participation will require approval from time to time by the City Council as the governing body for the City. Actions by the City may include, but are not necessarily limited to, the following:

- 1) Review of building or rehabilitation proposals for consistency with all requirements and standards promulgated by the City including, but not limited to conformance to the Municipal Code, development code and applicable ordinances, and, for projects that are found to conform to standards and requirements, issue building permits for said projects.
- 2) Institution and completion of proceedings for opening, closing, vacating, widening, or changing the grades of streets, alleys, and other public rights-of-way, and for other necessary modifications of the streets, the street layout, and other public rights-of-way in the Project Area. Such action by the City may include the abandonment and relocation of public utilities in the public rights-of-way as necessary to carry out this Plan.

- 3) Institution and completion of proceedings necessary for changes and improvements in publicly owned public utilities within or affecting the Project Area.
- 4) Imposition wherever necessary of appropriate design controls within the limits of this Plan upon parcels in the Project Area to ensure their proper development and use.
- 5) Provision for administration/enforcement of this Plan by the City after development.
- 6) Performance of the above and of all other functions and services relating to public health, safety, and physical development normally rendered in accordance with a schedule that will permit the redevelopment of the Project Area to be commenced and carried to completion without unnecessary delays.
- 7) The initiation and completion of any other proceedings necessary to carry out the Project.

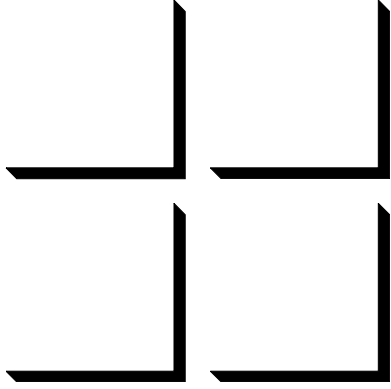
The Agency is authorized, but not obligated, to provide and expend funds to ensure the completion of the Project as a whole in accordance with this Plan. The obligation of the Agency to perform the actions indicated in this Section shall be contingent upon the continued availability of funding for this Project, primarily from tax increment revenues as defined in Section 510 hereof. However, the Agency may utilize any legally available sources of revenue for funding projects in accordance with this Plan.

E. (§640) COOPERATION WITH OTHER PUBLIC JURISDICTIONS

Certain public bodies are authorized by state law to aid and cooperate, with or without consideration, in the planning, construction, or operation of the Project. The Agency shall seek the aid and cooperation of such public bodies and shall attempt to coordinate this Plan with the activities of such public bodies in order to accomplish the purposes of redevelopment and the highest public good.

The Agency, by law, may acquire property already devoted to a public use, but is not authorized to acquire Real Property owned by public bodies without the consent of such public bodies. However, the Agency will seek the cooperation of all public bodies that own or intend to acquire property in the Project Area. Any public body that owns or leases property in the Project Area will be afforded all the privi-

leges of owner and tenant participation if such public body is willing to enter into a participation agreement with the Agency on terms determined pursuant to this Plan and the Agency's Owner Participation Rules.



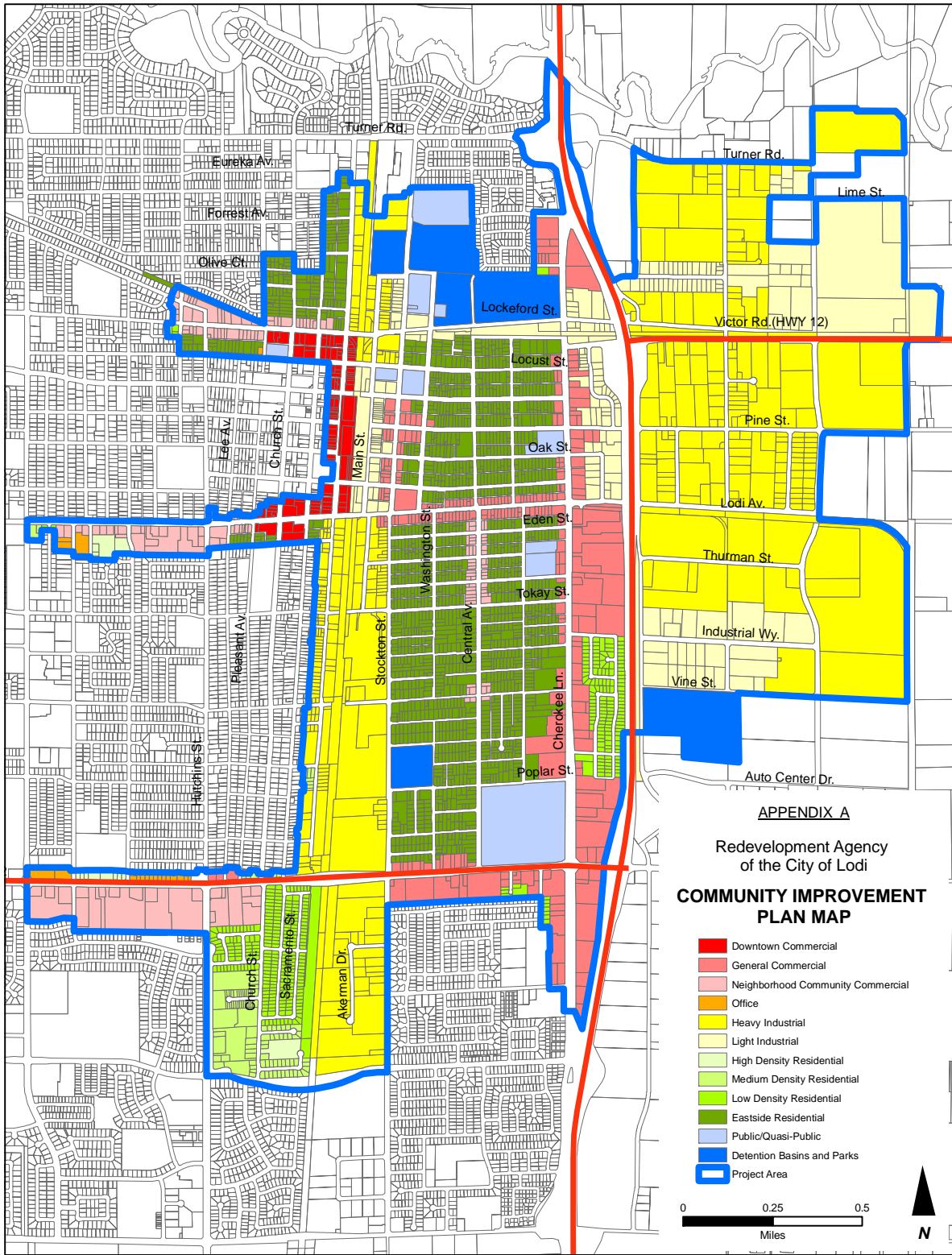
APPENDIX A

Community Improvement Map

ö ö ö

This page intentionally left blank

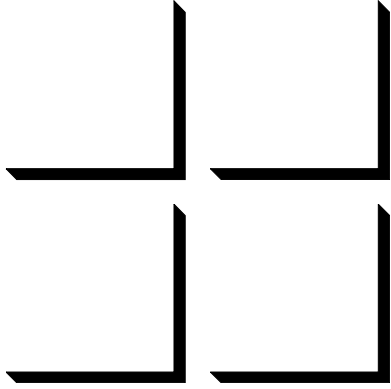
ö ö ö



ö ö ö

This page intentionally left blank

ö ö ö



APPENDIX B

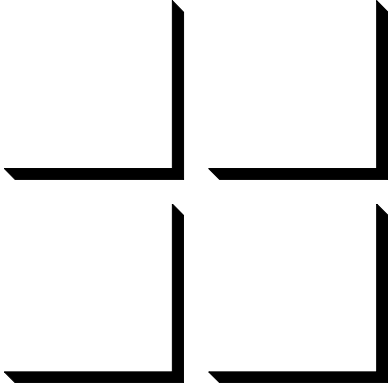
Project Area Legal Description

Final legal description will be provided after final plan adoption.

ö ö ö

This page intentionally left blank

ö ö ö



APPENDIX D

Environnemental Impact Report

GRC GRC GRC

This page intentionally left blank

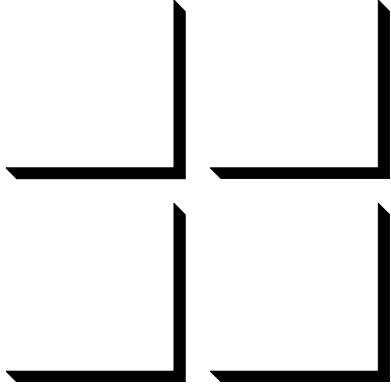
GRC GRC GRC

March 28, 2008

Draft Program Environmental Impact Report for the Lodi Community Improvement Project

Redevelopment Agency of the City of Lodi

SCH NO. 2008022053



March 28, 2008

Draft Program Environmental Impact Report for the Lodi Community Improvement Project

REDEVELOPMENT AGENCY OF THE CITY OF LODI

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

DRAFT

PROGRAM ENVIRONMENTAL IMPACT REPORT

for the

Lodi Community Improvement Project

(SCH NO. 2008022053)

March 28, 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 S. Parker Street, Suite 7400
Orange, CA 92868
(714) 234-1122

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

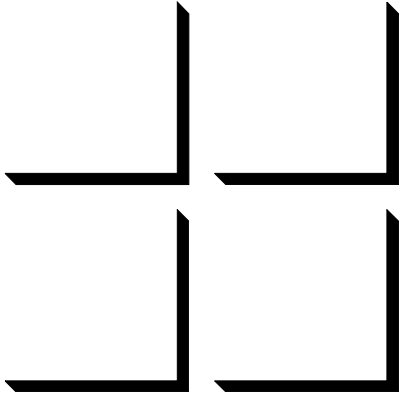
5.4	Mandatory Findings of Significance	78
5.5	Significant Irreversible Environmental Changes ...	78
6.0	Alternatives to the Proposed Project.....	81
6.1	No Project Alternative	83
6.2	Reduced Redevelopment Project Area Size	83
6.3	Environmentally Superior Alternative.....	84
7.0	Information Sources.....	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

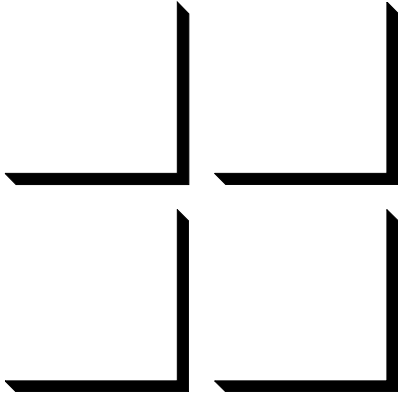
² State of California Community Redevelopment Law (Health and Safety Code 33000 et seq.).

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.

GRC GRC GRC

This page intentionally left blank

GRC GRC GRC



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.	<p>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.</p> <p>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 .</p>	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**

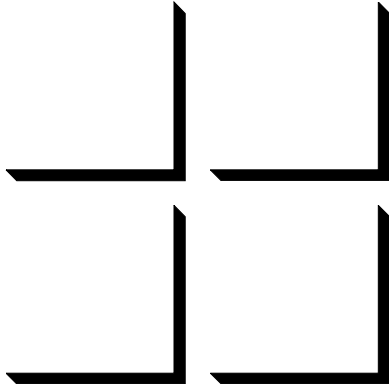
Section 15123(b)(3) of the CEQA Guidelines requires that the EIR Summary include a brief statement of issues to be resolved. In this proposed Project, the major issues to be resolved include decisions by the City as to:

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.

GRC GRC GRC

This page intentionally left blank

GRC GRC GRC



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.)

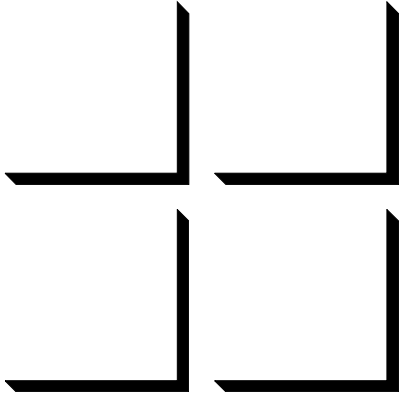
Preliminary Report for Lodi Community Improvement Project, March 6, 2008 – This report was prepared by GRC Redevelopment Consultants, Inc. on behalf of the Agency in accordance with CRL Section 33344.5. The Preliminary Report was prepared and distributed to the governmental agencies that levy ad valorem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

GRC GRC GRC

This page intentionally left blank

GRC GRC GRC



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.

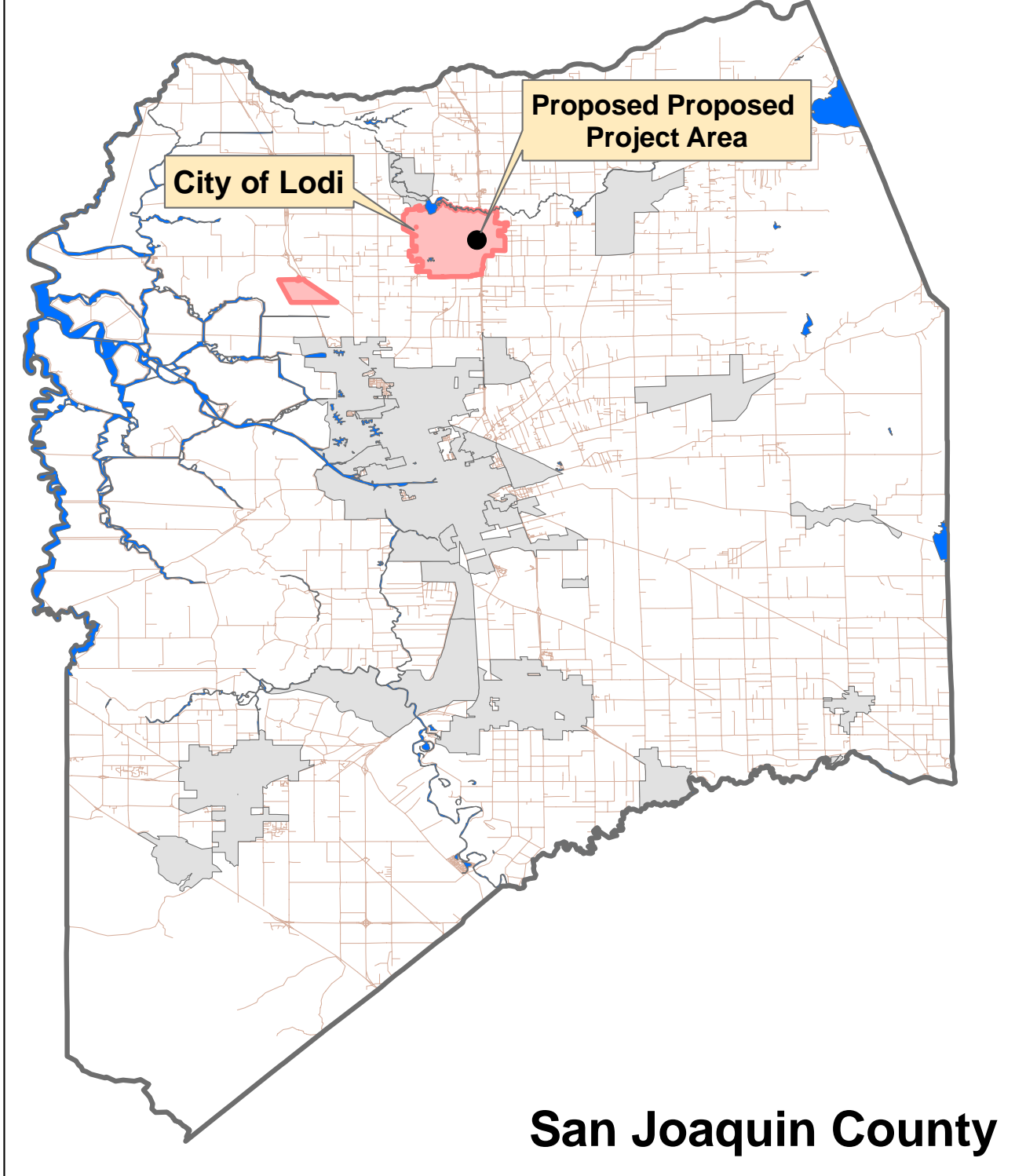
Creating a redevelopment project under CRL (Health and Safety Code Section 33000 et seq.; the “CRL”) may be the best way to address these problems, because it can provide a significant amount of money to address the problems affecting the area without raising taxes or imposing new fees. With this in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

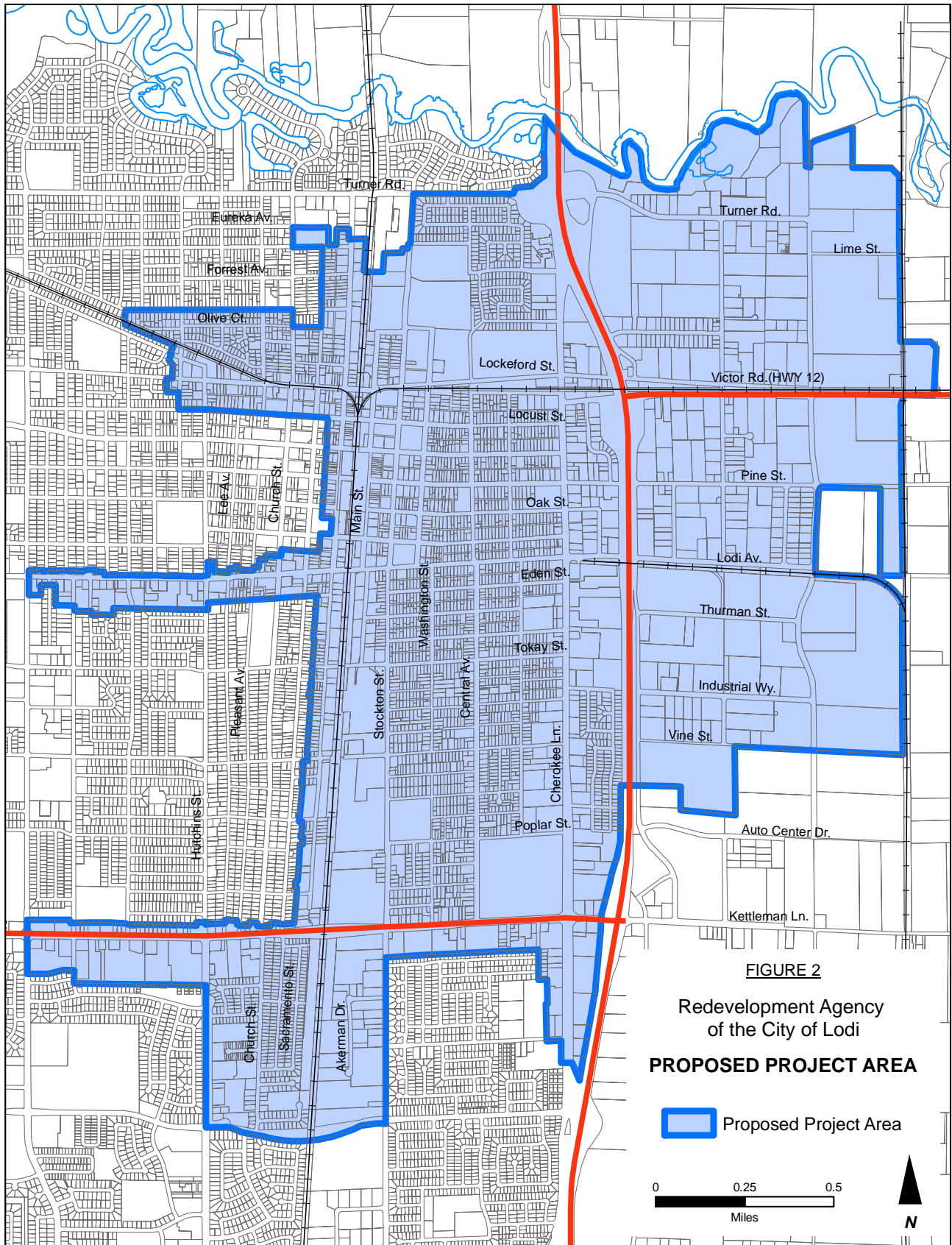
3.2 PROJECT LOCATION

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

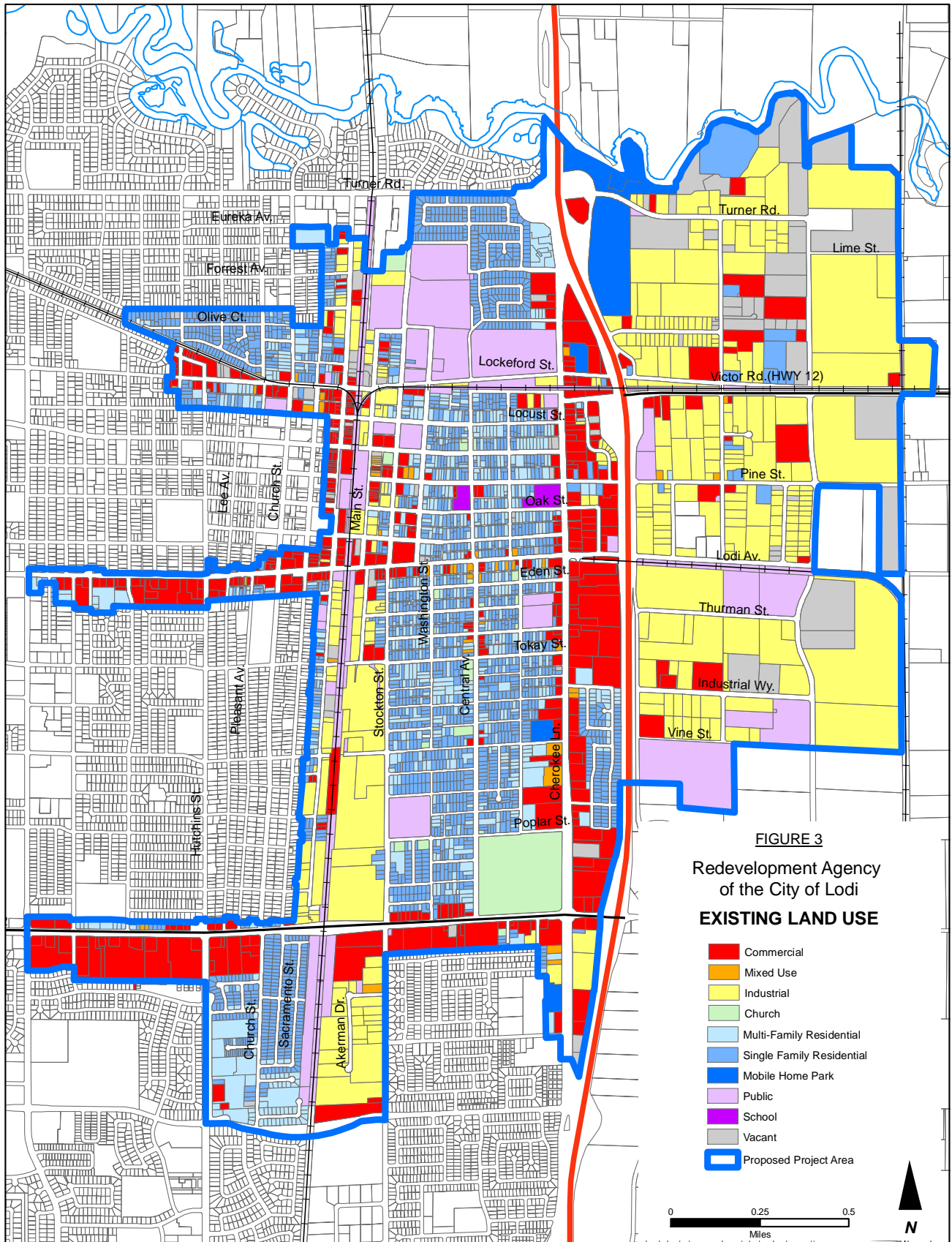


FIGURE 3
 Redevelopment Agency of the City of Lodi
EXISTING LAND USE

- 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

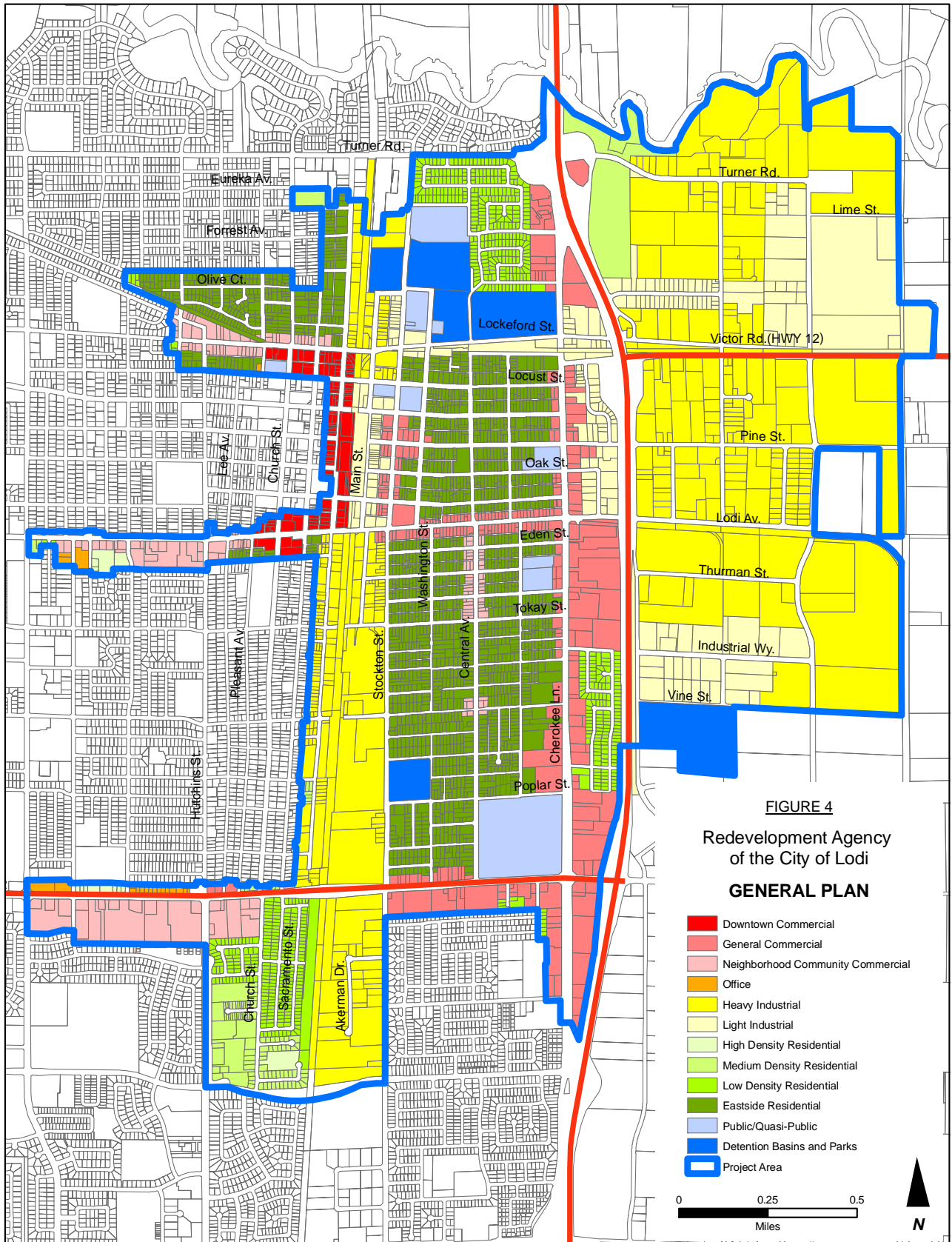
As shown in Table 3, the General Plan anticipates that amount of industrial land will increase, and residential and commercial will decrease somewhat. At build-out of the Project Area, the General Plan expects that 44% of the land will be industrial, 11% commercial, 21% residential, and 7% public/institutional⁹.

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.

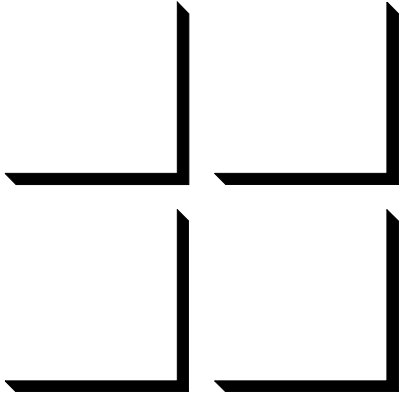
These General Plan designated land uses are the basis for assessing the future development potential of the Project Area and associated environmental impacts.



☐ ☐ ☐

This page intentionally left blank

☐ ☐ ☐



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**

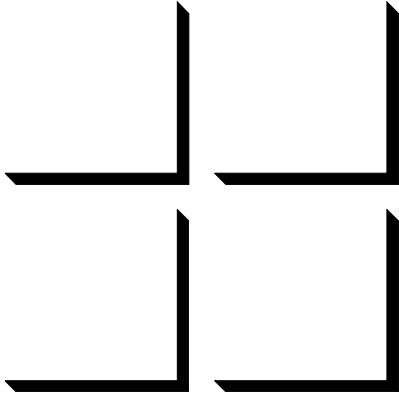
There is some potential for future development in the Project Area to impact historical resources. CUL-1 is recommended for inclusion to reduce these impacts to less than significant levels.

**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.

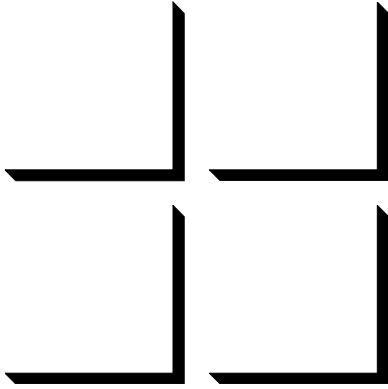
Improvements conducted under the Project would be consistent with the City General Plan. The Project would not commit future generations to uses not already planned. It would facilitate infill development, which would not involve a large commitment of nonrenewable resources. The Project would facilitate 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.

GPCJ GPCJ GPCJ

This page intentionally left blank

GPCJ GPCJ GPCJ



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.

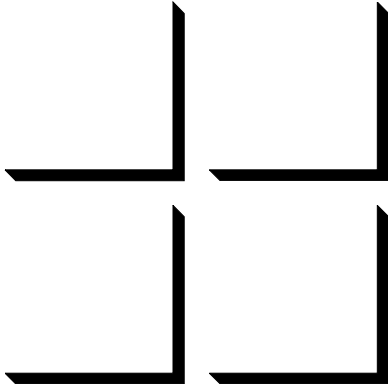
This alternative would allow the blighting conditions in the areas removed from the Redevelopment Plan to continue indefinitely and would reduce the ability of the Agency to implement needed improvements throughout the Project Area. Potential impacts to air quality, and cultural resources could occur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

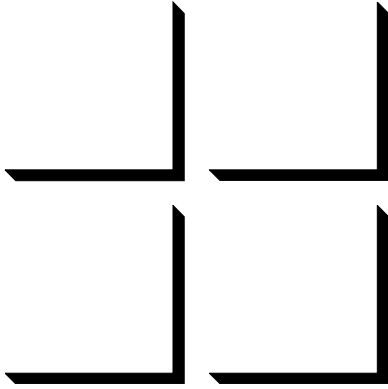
Feasibility Study for a Potential Redevelopment Project in East Lodi, prepared by GRC Redevelopment Consultants, Inc, October 19, 2007

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.

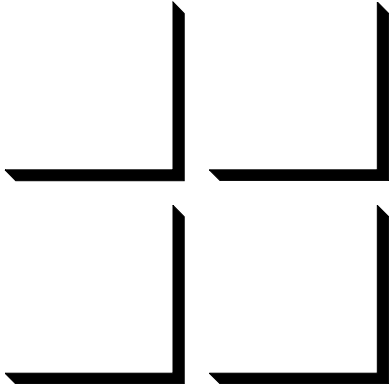
Environmental Impact Report (EIR) – Environmental Impact Report (EIR) is the environmental clearance document required to be prepared, pursuant to CEQA, for projects that may have a significant adverse impact on the environment.

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.



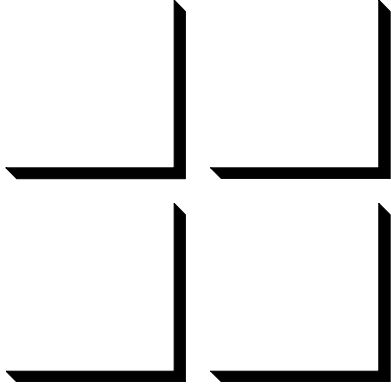
Appendix A

Initial Study and Notice of Preparation

GRC GRC GRC

This page intentionally left blank

GRC GRC GRC



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

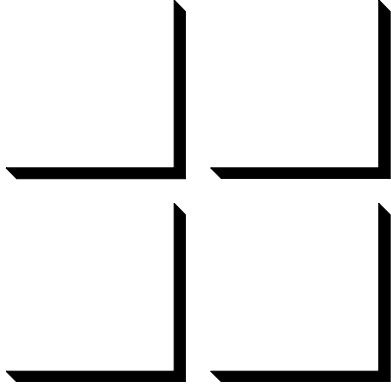
Preface.....	1
Conclusions and Findings	1
1.0 Project Description	3
2.0 Environmental Impacts.....	17
3.0 Determination.....	17
4.0 Criteria for Evaluation of Environmental Impacts	21
5.0 Environmental Impacts Analysis and Discussion.....	23
6.0 Sources Cited in Evalation of Environmental Impacts	43

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

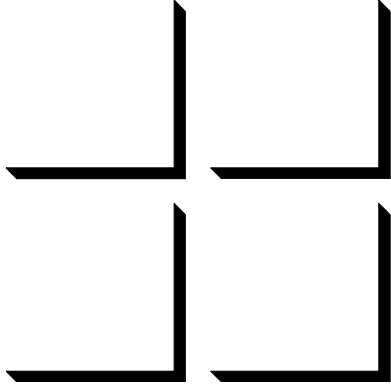
In accordance with California Community Redevelopment Law (Health and Safety Code Section 33000 *et seq.*; the “CRL”), future development within the Project Area that is directly or indirectly attributable to Agency activities must be consistent with land use

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:

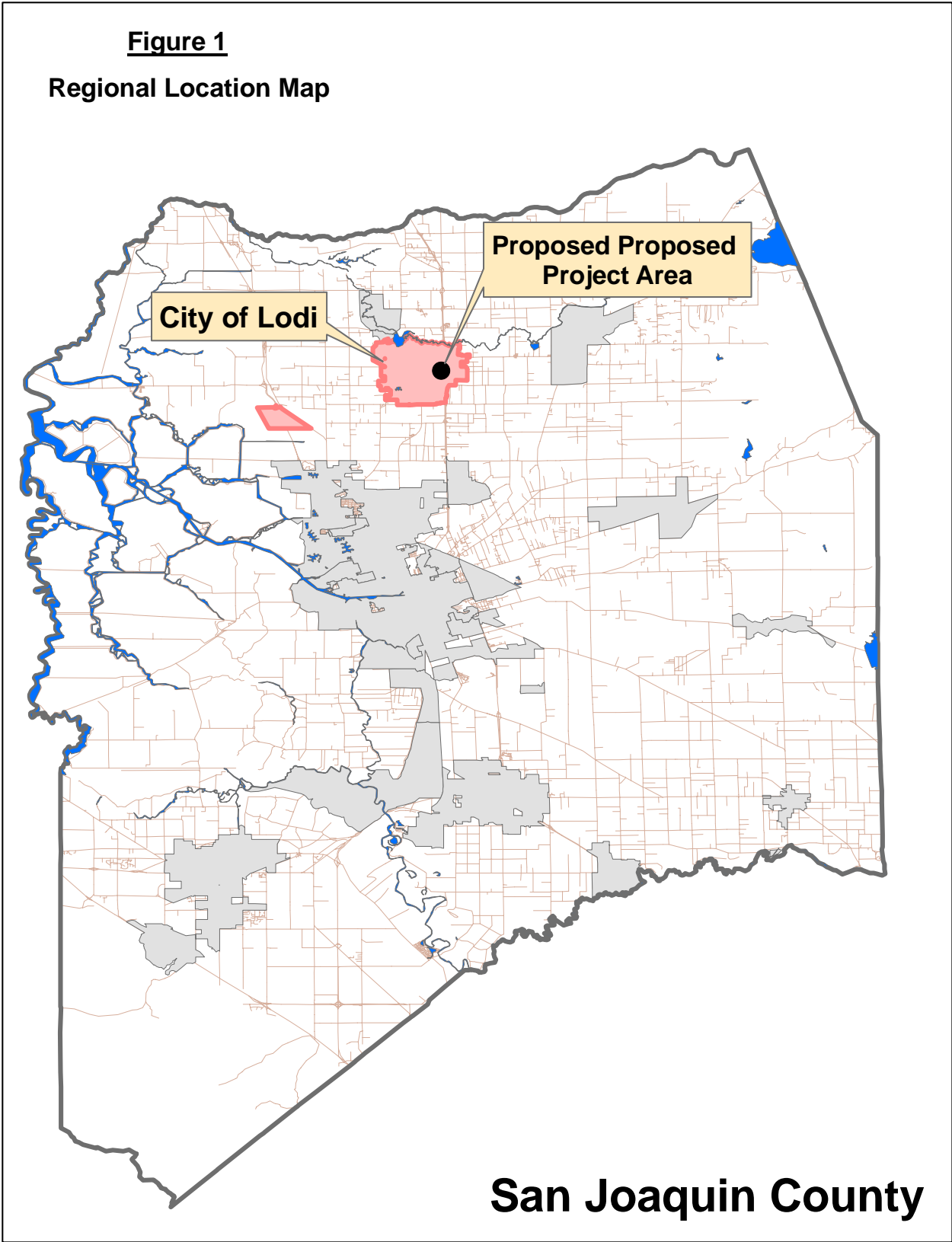
Redevelopment Agency of the City of Lodi
221 W. Pine Street
Lodi CA 95241-1910
(209) 333-6700

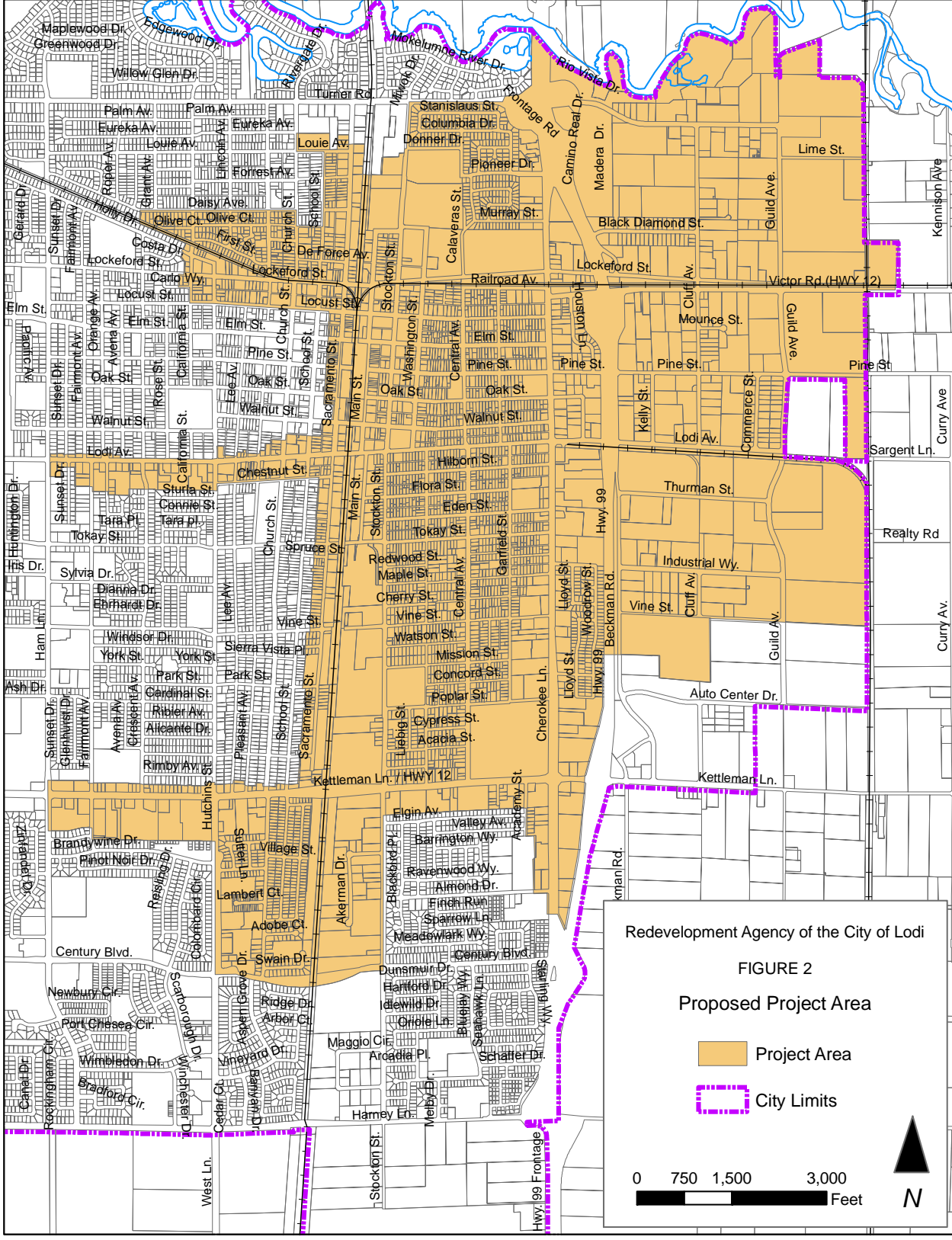
D. Contact Person and Phone Number:

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.

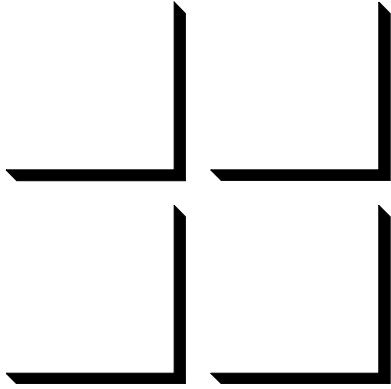
Industrial uses are generally located east of Highway 99. Commercial uses are generally located along the arterial roadways including, Cherokee Lane, Lodi Avenue and Kettleman Lane. Public uses are mostly schools, scattered throughout the Project Area.

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.

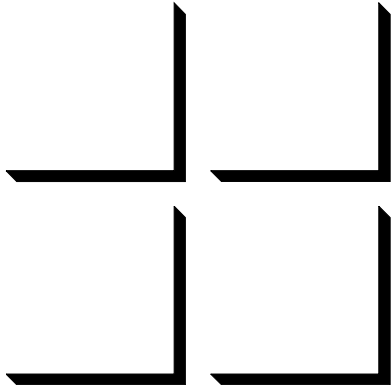


2.0 ENVIRONMENTAL IMPACTS

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.

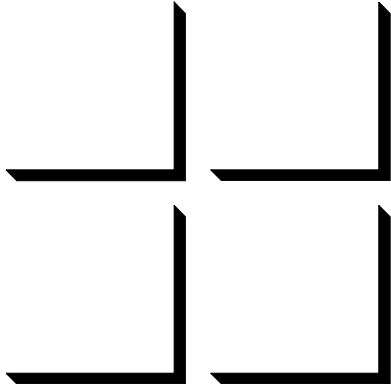
Date: 1/3/08

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



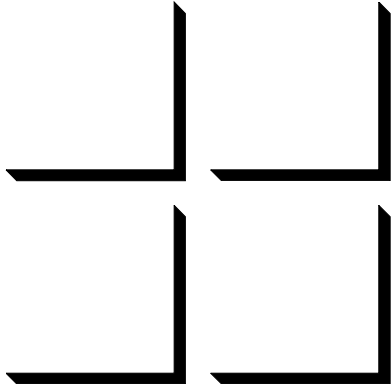
4.0 CRITERIA FOR EVALUATION OF ENVIRONMENTAL IMPACTS

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. <i>Less Than Significant.</i> According to the San Joaquin County Important Farmland Map ¹ , 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 efforts ² , 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"/>

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.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
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>
--	---------------------------------------	--	-------------------------------------	------------------

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.

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

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?

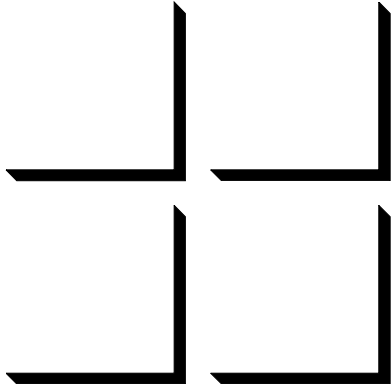
Explanation: *Potentially Significant.* As discussed under item IV, above, future new development and redevelopment in the Project Area are not expected to impact biological resources, which are protected through the SJMSCP. However, the existing historic structures within the Project Area could be affected 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

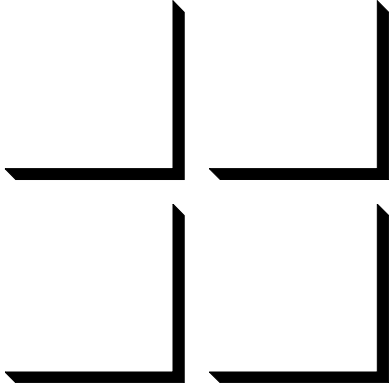
Section 15150 of the State CEQA Guidelines permits an environmental document to incorporate by reference other documents that provide relevant data. The documents outlined below are hereby incorporated by reference, and the pertinent material is summarized throughout this Initial Study where that information 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



This page intentionally left blank





Appendix B
Correspondence

GRC GRC GRC

This page intentionally left blank

GRC GRC GRC



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.

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)
 TTY: California Relay Service (800) 735-2929
 PHONE (209) 941-1921
 FAX (209) 948-7194



*Flex your power!
 Be energy efficient!*

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.

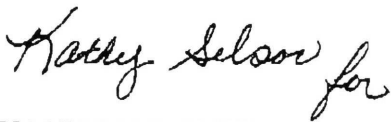
An Encroachment Permit will be required for work (if any) done within the Department's right of way. This work is subject to the California Environmental Quality Act (CEQA). Therefore, environmental studies may be required as part of the encroachment permits application. A qualified professional must 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

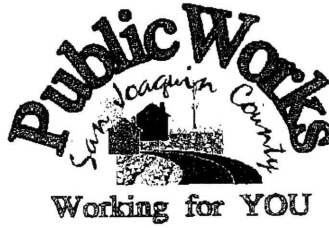
No. 0331 P. 4

Mr. King
March 7, 2008
Page 3

bc: TDumas
M Omar Traf Ops



THOMAS R. FLINN
DIRECTOR



P. O. BOX 1810 - 1810 E. HAZELTON AVENUE
STOCKTON, CALIFORNIA 95201
(209) 468-3000 FAX (209) 468-2999
www.sjgov.org/pubworks

THOMAS M. GAU
CHIEF DEPUTY DIRECTOR

MANUEL SOLORIO
DEPUTY DIRECTOR

STEVEN WINKLER
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.

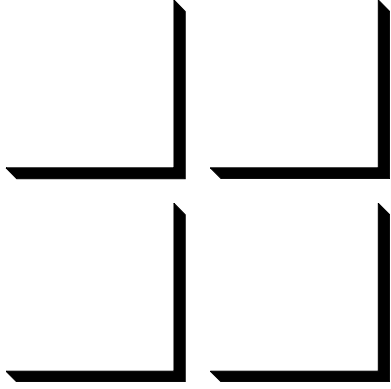
Thank you for the opportunity to be heard. Should you have questions or need additional information regarding the above comments, please contact me at 468-3085.

Sincerely,

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



APPENDIX E
Relocation Method

GRC GRC GRC

This page intentionally left blank

GRC GRC GRC

RESOLUTION NO. RDA2008-02

A RESOLUTION OF THE REDEVELOPMENT AGENCY OF
THE CITY OF LODI APPROVING AND ADOPTING RULES
GOVERNING PARTICIPATION AND RE-ENTRY
PREFERENCES FOR PROPERTY OWNERS, OPERATORS
OF BUSINESSES, AND BUSINESS TENANTS IN THE
LODI COMMUNITY IMPROVEMENT PROJECT AREA

WHEREAS, the Redevelopment Agency of the City of Lodi (the "Agency") has initiated proceedings for the consideration of the adoption of the Lodi community Improvement Project (the "Project"); and

WHEREAS, Section 33345 of the California Redevelopment Law (Health and Safety Code Section 33000 et seq.) provides that a redevelopment agency shall adopt and make available for public inspection rules to implement the operation of owner participation in connection with a redevelopment plan; and

WHEREAS, Health and Safety Code Section 33339.5 provides that a redevelopment agency shall adopt and make available for public inspection rules regarding the extension of reasonable preferences to persons who are engaged in business in the project area to re-enter in business within the redeveloped area if they otherwise meet the requirements prescribed by the redevelopment plan; and

WHEREAS, the Agency desires to adopt rules, which would apply to the Lodi Community Improvement Project.

NOW, THEREFORE, BE IT RESOLVED by the Redevelopment Agency of the City of Lodi as follows:

Section 1. The Redevelopment Agency of the City of Lodi hereby approves and adopts the "Rules Governing Participation and Reentry Preferences for the Lodi community Improvement Project Area" (referred to for convenience as the "Owner Participation Rules") in the form attached hereto as Exhibit "A" and incorporated herein by reference.

Section 2. The Owner Participation Rules shall be effective as of the date of this Resolution.

Dated: April 16, 2008

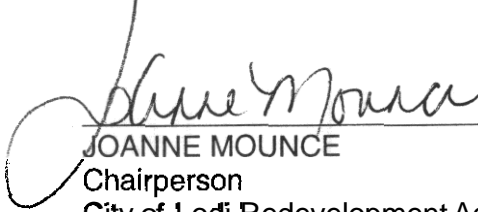
I hereby certify that Resolution **No. RDA2008-02** was passed and adopted by the Members of the Redevelopment Agency of the City of Lodi in a regular meeting held April 16, 2008, by the following vote:

AYES: MEMBERS – Hansen, Hitchcock, Johnson, Katakian, and
Chairperson Mounce

NOES: MEMBERS – None


ABSENT: MEMBERS – None

ABSTAIN: MEMBERS – None



JOANNE MOUNCE
Chairperson
City of Lodi Redevelopment Agency

Attest:



RANDI JOHL
Secretary
City of Lodi Redevelopment Agency

OWNER PARTICIPATION RULES

FOR THE LODI COMMUNITY IMPROVEMENT PROJECT

1. PURPOSE AND INTENT

These Owner Participation Rules (the “Owner Participation Rules”) are promulgated to implement the requirements of the Community Redevelopment Law, California Health and Safety Code Section 33000, et seq., and to implement the provisions of the Redevelopment Plan for the Lodi Community Improvement Project (“Project”), particularly with respect to participation by Owners and extension of reentry preferences to Businesses in the project area of the Project (the “Project Area”). These Owner Participation Rules shall be applicable to the Lodi Community Project, as it now exists and as it may be amended in the future. The objectives of these Owner Participation Rules are (i) to implement the operation of owner participation in connection with the Redevelopment Plan for Project by Owners of real property located within the boundaries of the Project Area by encouraging, soliciting, and, as *to* participants selected by the Agency, carrying out by agreement participation in the Project Area, and (ii) to extend and establish reasonable preference to persons who are engaged in business in the Project Area to reenter in business within the Project Area. These Owner Participation Rules provide to Owners a reasonable opportunity to identify their interest in owner participation, to submit Development Proposals, to receive good faith consideration by the Agency of complete Development Proposals, and, as selected by the Agency, to participate in the redevelopment in the Project Area. These Owner Participation Rules also allow for negotiations for the redevelopment and participation in the Project Area by persons and entities other than Owners.

Adoption of owner participation and business reentry rules is required notwithstanding the fact that the redevelopment plan for the Project Area (the “Redevelopment Plan”) will not contain the power of eminent domain by the Agency.

2. DEFINITIONS

For the purposes of these Owner Participation Rules, the following terms shall have the following definitions:

“*Agency*” means the Redevelopment Agency of the City of Lodi, a public body, corporate and politic.

“*Agreement*” means a transactional agreement between the Agency and one or more third parties and includes any owner participation agreement, disposition and development agreement, affordable housing agreement or any other agreement under which the Agency commits to participate and/or provide financial assistance to a proposed development or redevelopment project which does not consist of public improvements.

“*Business*” or “*Businesses*” mean any person, persons, corporation, association, partnership, limited liability company, or other entity lawfully engaged in business within the Project Area on the date of adoption of these Owner Participation Rules.

“*City*” means the City of Lodi, California, a municipal corporation.

“*City Council*” means the legislative body of the City of Lodi.

“*Day*” is defined in the Government Code of the State of California.

“*Development Proposal*” means a complete and detailed proposal for a development or redevelopment project or other participant proposal which is timely submitted to the Agency, in accordance with, and meeting the requirements of, Section 3.2 hereof.

“*Displaced Business*” means a Business, if any, which is displaced directly by Agency action in implementation of a public program or project.

“*Executive Director*” means the Executive Director of the Agency, or his/her designee.

“*Implementation Plan*” means, initially, the Redevelopment Plan, and thereafter each implementation plan as thereafter adopted by the Agency from time to time pursuant to section 33490 of the California Health and Safety Code.

“*Owner*” or “*Owners*” mean any person, persons, corporation, association, partnership, limited liability company or other entity (a) holding fee title of record to real property in the Project Area on the date of adoption of these Owner Participation Rules.

“*Owner Participation Agreement*” means a type of Agreement which is entered into between the Agency and an Owner in accordance with the provisions of the applicable Redevelopment Plan and the Owner Participation Rules as set forth herein.

“*Owner Participation Rules*” means these rules governing owner participation and reentry preferences in the Project Area.

“*Non-Owner*” means any person or entity which is not an Owner in the Project Area, but is interested in the submittal and consideration of a Development Proposal by the Agency.

“*Participant*” means an Owner which has entered into an Owner Participation Agreement with the Agency.

“*ProjectArea*” means the territory within the boundaries of the Project Area.

“*Project*” means the Lodi Community Improvement Project as adopted and merged and as it may be amended from time to time.

“*Redevelopment Plan*” means the redevelopment plan as shall have been adopted by the City Council establishing the Project, as now adopted and as they may be amended from time to time.

“*Redevelopment Project*” means Lodi Community Improvement Project, which was adopted by the City Council of the City of Lodi by Ordinance No. ____, as may be amended from time to time.

“*Statement of Interest*” means a statement by an Owner that such Owner is interested in participation in the development or redevelopment of property or other form of participation. A Statement of Interest, whether solicited by the Agency or submitted by an Owner of its own initiative, must be in writing, and shall be in substantially the form of the Owner’s Statement of Interest to Participate which is attached and incorporated as Exhibit “A” to these Owner Participation Rules, and which may be updated from time to time.

“Statement of Interest in Business Reentry” means a statement by a Business that such Business is interested in reentry into the Project Area. A Statement of Interest in Business Reentry, whether solicited by the Agency or submitted by a Business of its own initiative, must be in writing, and, shall be in substantially the form of the Statement of Interest in Business Reentry which is attached and incorporated as Exhibit “B” to these Owner Participation Rules, and which may be updated from time to time.

“Tenant” means any person, persons, corporation, association, partnership or other entity that rents or leases **real** property in the Project Area on the date of adoption of these Owner Participation Rules.

3. PROCEDURES FOR OWNER PARTICIPATION

Owners within the Project Area who desire to exercise their participation rights shall follow the procedures which are set forth in this Section 3:

3.1 Solicitation of Participation by the Agency to Owners; Submission of Statement of Interest by Owners.

(a) The Agency, through its staff, shall notify Owners within the Project Area of the opportunity to submit a Statement of Interest and a Development Proposal for the development, or other participation proposal. In addition, upon the adoption of the annual budget, which includes resources available for owner participation, notice will be given. Such notification shall be made through one of the following methods, any of which shall be deemed sufficient to provide adequate notice:

(i) The Agency shall send notice via First Class mail to the Owners of parcels within the boundaries of the Project Area, or

(ii) The Agency shall cause to be published a legal notice in a newspaper of general circulation notifying Owners in the Project Area of the opportunity to submit a Statement of Interest, a Development Proposal for the development of property, or other participation proposal, or

(iii) The Agency shall cause to be posted on the website maintained by the City a form of notice notifying Owners in the Project Area of the opportunity to submit a Statement of Interest, a Development Proposal for the development of property, or other participation proposal.

(iv) An owner may submit a Statement of Interest to the Agency at any time.

3.2 Submission and Form of Development Proposals.

(a) Development Proposals shall include the following:

(i) Construction and development pro forma, a site plan, developer qualifications, a narrative description of the market support for the proposed project, an operating pro forma, as applicable, evidence of likelihood of obtaining franchise or manufacturer approval (if applicable), and an explanation of the economic benefits to the Agency, City and community of the proposed project.

(b) A Development Proposal submitted by an Owner may provide for an Owner to participate in substantially the same location as the Owner's present use, may provide for expansion of the Owner's present use by retaining all or portions of Owner's property and acquiring adjacent property, may provide for the Owner's participation in a different location within the Project Area from the location in which the Owner's property is currently located, or may propose some other form of participation by the Owner in the redevelopment of the proposed development site.

(c) Owners shall provide such additional information as may be reasonably requested by the Executive Director and Agency staff.

(d) The Agency's staff will be available to discuss owner participation, respond to questions, and assist Owners in the preparation of Development Proposals; provided that the Owner in all instances, and not the Agency staff, shall be responsible for the content, form, and preparation of any Development Proposal.

3.3 Agency Board Evaluation of Development Proposals Submitted by Owners.

(a) The Agency shall consider in good faith and without discrimination all Development Proposals submitted by Owners and determined by Agency staff to be complete at a regular or special Agency meeting. After good faith consideration of any Development Proposal, the Agency may authorize Agency staff to commence negotiations subject to availability of funding, resources, and other limiting factors for the purpose of arriving at an Owner Participation Agreement.

(b) In the exercise of its discretion, the Agency acknowledges that its primary purpose, objective, and duty is to carry out and implement the Redevelopment Plan and to eliminate blight in the interest of the health, safety and welfare of the community; the Agency additionally seeks to expand, preserve and improve the community's supply of affordable housing available subject to enforceable restrictions as provided under sections 33334.2 and 33334.3 of the Health and Safety Code. The Agency's decision to accept, conditionally accept, or reject any Development Proposal will be made in good faith and in consideration of such purpose, objective, and duty.

(c) Development Proposals shall be evaluated by the Agency with consideration of factors determined by the Agency to be relevant in carrying out its duties to implement the applicable Redevelopment Plan and the Implementation Plan, including without limitation the following factors:

(i) Conformity of the Development Proposal, including proposed uses, with the requirements, intent, goals, and objectives of the applicable Redevelopment Plan, the Implementation Plan, the City General Plan, any applicable specific plan, zoning, and other development standards, and other applicable enactments;

(ii) Quality of design and project concept;

(iii) The employment opportunities and economic benefits to the Agency and to the City which can be reasonably expected to result from the implementation of the Development Proposal;

(iv) The qualifications of the developer entity team proposed to develop the project, including financial capacity to undertake the project, prior experience with similar development, quality of prior development projects, degree of site control, ability to obtain financing, ability to abide by Agency design standards and development controls, and readiness to proceed;

(v) The estimated cost, if any, of City and/or Agency financial involvement, including the provision of City and/or Agency public services, subsidies, or public improvements required if the Development Proposal is accepted, and the availability of sufficient Agency and/or City funds to pay such costs;

(vi) The economic benefits to the Agency, the City, and the community, as determined by a cost/benefit analysis, if the Development Proposal were to be approved and the proposed project is implemented;

(vii) The effect of the Development Proposal on elimination of blighting conditions within the Project Area and the upgrading of uses;

(viii) The effect of the Development Proposal on achieving the affordable housing objectives of the Agency;

(ix) The probability of successful implementation of the Development Proposal, including without limitation likelihood of obtaining related approvals (such as approval by tenants, franchisor(s), or manufacturer(s), if applicable), as well as likelihood of economic success;

(x) The time schedule for completion of the proposed project;

(xi) The completeness of the Development Proposal;

(xii) The environmental benefits or impacts of the proposed development, and evaluation of the cost and method of mitigation of such impacts, if any;

(xiii) The impact of the Development Proposal on existing buildings and improvements with historic qualities or architectural qualities which enhance or benefit the Project Area; and

(xiv) The merits of the Development Proposal relative to the merits of other Development Proposals considering available resources.

(d) The Agency reserves the right to reject any and all Development Proposals and/or such other requests as may be made in connection with these Owner Participation Rules.

(e) The Agency does not, by adoption of these Owner Participation Rules, commit any resources or appropriate or approve the expenditure of any moneys or approve any development, redevelopment or renovation.

3.4 Unsolicited Submittal of Statements of Interest and Development Proposals by Owners.

(a) Under these Owner Participation Rules, Owners may submit Statements of Interest to the Agency on their own initiative, rather than through the solicitation of interest by the Agency.

3.5 Concurrent Consideration of Development Proposal(s) Submitted by Non-Owners.

(a) Any Non-Owner may submit to the Agency a Development Proposal for the proposed development of property within a Project Area at the same time that Owners are submitting Development Proposals solicited by the Agency pursuant to these Owner Participation Rules.

(b) The Agency may, but is not required to, evaluate, consider, and take action on such Development Proposal(s) from one or more Non-Owners concurrently with its evaluation, consideration, and action on the Development Proposals solicited by the Agency and submitted by Owners under these Owner Participation Rules.

3.6 Negotiations Toward Execution of Owner Participation Agreement. Subject to authorization of the Agency, Agency staff will, within the limitations of its currently available resources, use good faith efforts to negotiate toward and enter into a mutually acceptable Owner Participation Agreement (or other Agreement, as applicable) with each Owner who has submitted a Development Proposal. Each Agreement shall contain provisions necessary to ensure that the Development Proposal will be carried out with such covenants, conditions and restrictions as the Agency reasonably requires. Each Agreement will require the Participant to execute and record such further documents as the Agency may require in order to ensure conformance with the Community Redevelopment Law and other applicable laws, to provide record notice of covenants, conditions and restrictions which are imposed by the Agreement, and to provide security for the obligations of the Participant. All Agreements with an Owner shall become effective only when duly approved by the Agency Board and executed by the Owner/Participant. Good faith efforts by the Agency shall not be deemed to require or imply that public funds will be made available in connection with the Development Proposal or the activities proposed thereunder.

3.7 Agency Action on Agreement for Development with Non-Owner.

(a) The Agency may enter into an Agreement with any Non-Owner for the development or rehabilitation of property implementing a Development Proposal submitted by a Non Owner.

4. REENTRY PREFERENCES FOR DISPLACED BUSINESSES

Persons who are engaged in business in the Project Area which have been displaced by Agency activities who desire to exercise their reentry preferences shall follow the procedures which are set forth in this Section 4.

4.1 List of Displaced Businesses. The Agency will notify any business which is a Displaced Business (as defined herein) of their right of reasonable preference to reenter in business within the Project Area. Such written request shall be in writing and, if presentable, should be substantially in the form of the Statement of Interest in Business Reentry in the Project

Area which is attached and incorporated as Exhibit “B” to these Owner Participation Rules. The Agency shall maintain a list of such Displaced Businesses who have submitted to the Agency a written request for notice of opportunities to reenter within the Project Area. The Agency may periodically require Displaced Businesses on such list to resubmit requests for notice of reentry opportunities, and may delete Displaced Businesses from such list which do not resubmit such requests.

4.2 Notice of Reentry Opportunities. In the event that the Agency becomes involved with any redevelopment activity through an Owner Participation Agreement or Disposition and Development Agreement in which a Displaced Business might relocate, the Agency, through its staff, shall notify the project proponent in connection with such proposed Owner Participation Agreement or Disposition and Development Agreement as to the Agency’s list of the opportunity to reenter in business in the Project Area. Notwithstanding the foregoing, if a Business owner requests that the name of such owner’s business not be disclosed in connection with prospective agreements, the Agency staff need not disseminate the name of such business.

4.3 Agency Extension of Preferences. The Agency shall use good faith efforts to secure reasonable preferential rights for Displaced Businesses in Owner Participation Agreements or Disposition and Development Agreements which provide for the development of structures in which a Displaced Business might relocate. Displaced Businesses which desire to pursue such reentry opportunities may negotiate directly with the owner of the property in which the reentry opportunity is located. The Agency shall use good faith efforts to negotiate or intercede on behalf of the Displaced Business desiring to re-enter; provided that the activities and uses conducted by such Displaced Business are consistent with and further the proposed development, and provided further that such efforts shall not be deemed to require the payment of moneys by the Agency. The ability of Displaced Businesses to re enter will depend, in part, upon the ability of the Displaced Businesses to participate on the basis proposed, including such factors as the ability to pay the requisite rent, the suitability of the proposed use of the Displaced Business for the development under consideration, the Displaced Businesses’ readiness to proceed, and other factors. The preferences established by this Section 4 shall not be construed to require the Agency to provide a subsidy or other financial assistance to such Displaced Businesses to enable them to reenter in the Project Area.

5. PROCEDURE FOR AMENDING OWNER PARTICIPATION RULES

The Agency may amend these Owner Participation Rules at a duly noticed regular or special meeting held after their adoption.

EXHIBIT "A"

REDEVELOPMENT AGENCY OF THE CITY OF LODI

OWNER'S STATEMENT OF INTEREST TO PARTICIPATE

I hereby express my interest in participation in the Lodi Community Improvement Project (the "Project") (See attached map for Project Area boundaries):

1. Name _____ Telephone _____

2. Address _____

3. I am the record fee owner of the following property within the Project Area or hold a proprietary interest: _____

I wish to participate in the Project Area checked above as follows:

- I wish to construct a new building or other improvements on my present property.
- I wish to acquire property within the Project Area and construct a new building or other improvements on the property I acquire. I acknowledge that the Agency does not have the power of eminent domain. (Identify proposed property below)
- I wish to acquire property within the Project Area for expansion of my current business. I acknowledge that the Agency does not have the power of eminent domain. (Identify **proposed** property below)
- I wish to rehabilitate my present property.
- I wish to acquire property within the Project Area and rehabilitate an existing building or other improvements on the property I acquire. I acknowledge that the Agency does not have the power of eminent domain. (Identify proposed property below)
- I wish to sell my present property.
- Other; if necessary, continue on additional page(s). Please Describe:

- Location of property proposed to be acquired _____

4. Background, experience, and information concerning you and your proposal (you may include further information, including a site plan, construction and operating pro forma, and other information relevant to your proposed activity, on additional sheets if you desire to do so):

(a) Generally describe background and experience, particularly with respect to development of real property: _____

(b) Describe the development and redevelopment activities you propose and indicate your experience relevant to your proposal _____

(c) Other remarks: _____

5. By my signature below:

- I acknowledge receipt of a copy of the Owner Participation Rules and Reentry Preferences. The Owner Participation Rules and Reentry Preferences describe in detail when and how I may participate in connection with the Project, and the Agency's obligations with respect to my proposal.
- I understand that after I timely submit this Statement of Interest I will be required to submit a detailed "Development Proposal" in order for my Development Proposal to be considered by the Redevelopment Agency of the City of Lodi.
- I understand that submission of this Statement of Interest does not in any way obligate me to participate in the Project Area, or obligate the Redevelopment Agency of the City of Lodi to approve my proposal.

This Statement of Interest is presented to the Agency pursuant to the Owner Participation Rules and Reentry Preferences on the _____ day of _____ 200_.

Signed: _____

Print Name: _____

Title (if applicable): _____

Date: _____

EXHIBIT "B"

REDEVELOPMENT AGENCY OF THE CITY OF LODI

**STATEMENT OF INTEREST IN BUSINESS REENTRY
IN THE PROJECT AREA**

I hereby express my interest in reentering business in the Lodi Redevelopment Project (the "Project") (See attached map for Project Area boundaries):

1. Name _____ Telephone _____

2. Address _____

3. I am the owner of the following Business which was displaced from the Project Area by action of the Redevelopment Agency of the City of Lodi (Identify name and address of displaced Business): _____

Manner in which displacement occurred: _____

4. I wish to reenter business in the Project Area checked above as follows:

I wish to be notified by the Agency of opportunities to lease finished rental space within the Project Area.

Other. Please Describe (if necessary, continue on additional page(s)):

5. Background, experience, and information concerning you and your interest in reentering business within the Project Area.

(a) Generally describe business background and experience: _____

(b) Describe the business activities you propose and indicate your experience relevant to your proposal _____

(c) Other remarks: _____

6. By my signature below:

I understand that submission of this Statement of Interest in Business Reentry does not in any way obligate me to reenter business within the Project Area, or obligate the Redevelopment Agency of the City of Lodi to provide any financial or other assistance to me/my business or obtain a business opportunity for me.

Signed _____

Print Name: _____

Title (if applicable): _____

Date: _____