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TRANSPORTATION PLANNING AND ENGINEERING

Date: January 5, 2025

To: Dorothy Kam, Senior Traffic Engineer, City of Lodi

From: George Ghossain, Principal Engineer, Integrated Engineering Group

Subject: Scoping Agreement for the Gantner Public Elementary School Project, City of Lodi

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Integrated Engineering Group (IEG) is pleased to submit this scoping agreement memo for the proposed Gantner Elementary School project (Project) located at 2801 West Vine Street in the City of Lodi, California. The project is proposing the construction of a new elementary school on a 12 acres vacant site. The school site is approximately 2.80 miles west of Highway 99, and approximately 0.50 miles north of Highway 12 (West Kettleman Lane).

The proposed school would involve the construction of a new kindergarten through 6th grade Public elementary school, with the potential to expand to 8th grade and increase enrollment to approximately 850 students at a future date. Access to the proposed school would be from both Vine Street and Westgate Drive.

The proposed school is anticipated to be constructed in three phases, with the first two phases constructed concurrently, and the third phase constructed in the future when the school expands to approximately 850 students. Phase I construction is anticipated to include seven buildings housing a library, administrative support offices, a multi-purpose room, kitchen, a music room, approximately 19 classrooms, and an outdoor area including basketball courts and a lunch area. Phase 2 is anticipated to provide three buildings with approximately 10 classrooms, and Phase 3 anticipated to construct approximately 10 classrooms. Restrooms would also be included with separate facilities for staff and students. Walkways would allow American with Disabilities Act (ADA) access within the proposed school. Additionally, access would be appropriate for emergency vehicles including road approaches, parking lots, and on-site access to all buildings. Drought-tolerant landscaping would be provided throughout, and the boundary of the proposed school would be surrounded by fencing with gates at the entry and exit driveways.

Our goal is to obtain comments from City of Lodi staff, to ensure this scoping agreement addresses the analysis requirements for the project, according to SB 743 Implementation Guidelines for the City of Lodi*, January 2025 (Guidelines)*.

The preliminary site plan for the Project is shown in the **Attachment**. It is anticipated that the Project will be constructed in three phases.

TRANSPORTATION IMPACT ANALYSIS PROCESS

The Guidelines provide recommendations and guidance for the California Environmental Quality Act (CEQA) TIA process including screening criteria, assessment methods and defining thresholds of significance.

VMT SCREENING CRITERIA

Per the City guidelines, *"special consideration will be necessary to analyze VMT impacts for land uses that do not fit into any of the above eight categories. Common examples are: hotels, medical centers, wineries, churches, schools/colleges, specialty retail uses, etc. These uses should be analyzed on a case-by-case basis using available information and applying the general intent of the Technical Advisory"*. The proposed project is an elementary school that is required to be analyzed on a case-by-case analysis to determine whether the project can be screened and presumed to have a less than significant VMT impact. IEG has prepared a VMT screening assessment report for staff review and consideration.

PROJECT ACCESS

Access to the proposed school would be provided via Vine Street and Westgate Drive, respectively. There would be two student drop-off/pick-up areas with one entry and exit driveway on the east side of Westgate Drive, north of Vine Street, and second with entry and exit driveways on Vine Street. These drop-off/pick-up areas would be one direction and have room for parking. There would also be sidewalks installed to allow for safe access for pedestrians.

Should you have any questions, please feel free to contact me at:

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Phone: (951) 239-1546
Address: 23905 Clinton Keith Road 114-280
Wildomar CA, 92595

Attachment – Project Site Plan

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ATTACHMENT – Project Preliminary Site Plan

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Gatner Public Elementary School
Project Preliminary Site Plan
Attachment 1

Gantner Public Elementary School
Vehicle Miles Traveled
Screening Assessment

Prepared for:

Terracon

145 W Walnut Street | Carson, CA

Prepared by:

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January 2026

1.0 PROJECT INTRODUCTION

The purpose of this report is to evaluate the Gantner Public Elementrary School Project's (Project) VMT analysis requirements and compliance with Senate Bill 743 (SB 743) and the California Environmental Quality Act (CEQA).

1.1 PROJECT DESCRIPTION

The proposed school would involve the construction of a new kindergarten through 6th grade Public elementary school, with the potential to expand to 8th grade and increase enrollment to approximately 850 students at a future date.

The proposed school is anticipated to be constructed in three phases, with the first two phases constructed concurrently, and the third phase constructed in the future when the school expands to approximately 850 students. Phase I construction is anticipated to include seven buildings housing a library, administrative support offices, a multi-purpose room, kitchen, a music room, approximately 19 classrooms, and an outdoor area including basketball courts and a lunch area. Phase 2 is anticipated to provide three buildings with approximately 10 classrooms, and Phase 3 anticipated to construct approximately 10 classrooms. Restrooms would also be included with separate facilities for staff and students. Walkways would allow American with Disabilities Act (ADA) access within the proposed school. Access to the proposed school would be from both Vine Street and Westgate Drive. Additionally, access would be appropriate for emergency vehicles including road approaches, parking lots, and on-site access to all buildings. Drought-tolerant landscaping would be provided throughout, and the boundary of the proposed school would be surrounded by fencing with gates at the entry and exit driveways.

Figure 1-1 shows the Project site plan.

1.2 SENATE BILL 743

On September 27, 2013, SB 743 was signed into State law and started a process intended to fundamentally change transportation impact analysis as part of the CEQA compliance. The California Natural Resource Agency updated the CEQA transportation analysis guidelines in 2018. In this update automobile delay and LOS metrics are no longer to be used in determining transportation impacts. Instead VMT metrics will serve as the basis in determining impacts. Furthermore, the guidelines stated that after July 1, 2020, transportation analysis under CEQA must use VMT to determine impacts for land use projects.

1.3 GUIDANCE DOCUMENTS

The project is within the jurisdiction of the City of Lodi. The City has adopted guidance on evaluating VMT for transportation impacts under CEQA, consistent with the Governor's Office of Planning and Research (OPR), *Technical Advisory on Evaluating Transportation Impacts in CEQA*, December 2018. For this project, the *City of Lodi SB 743 Implementation Guidelines*, January 2025, hereafter referred to as "Guidelines", will be used for this assessment.

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Gatner Public Elementary School
Project Preliminary Site Plan
Figure 1-1

2.0 ANALYSIS METHODOLGY

2.1 SCREENING CRITERIA ASSESMENT

2.1.1 Guidelines

The Guidelines detail the requirements for the project's VMT analysis consistent with CEQA including five (5) screening categories to determine if a development project could be screened out from conducting a project level VMT analysis based on their size, location, or accessibility to transit.

- *Small Projects –* The Technical Advisory concludes that, absent any information to the contrary, projects that generate 110 trips per day or less may be assumed to cause a less-than-significant transportation impact. This level of trip generation equates to about 10,000 square feet of office space, 11 single-family dwelling units, or 17 multi-family dwelling units.
  Evaluation: This type of screening is generally reasonable, if not more stringent than many City Transportation Impact Study (TIS) Guidelines that typically do not even require studies unless projects generate 500 or more daily trips.

- *Projects near Transit Stations* – projects located within ½ mile of an "existing major transit stop" or an "existing stop along a high-quality transit corridor" would have a less-than-significant impact on VMT.
  Evaluation: This type of screening is also reasonable. Analysts will need to carefully determine whether the site-specific conditions meet the "major transit stop" and "high quality transit corridor" definitions. Additionally, there are specific conditions on projects that must also be met.

- *Affordable Residential Development* – projects consisting of a high percentage of affordable housing may be assumed to cause a less-than-significant transportation impact on VMT because they may improve jobs-housing balance and/or otherwise generate less VMT than market-based units.
  Evaluation: While it is correct that affordable housing projects generate fewer trips per unit than market-based units, they nonetheless would generate new VMT. At issue is whether these units should be considered as separate land use similar to active-adult units, and then evaluated for their relative efficiency within the City (similar to how single-family and multi-family is being treated). When the City receives a development application for this type of use, a detailed evaluation of this topic should occur.

- *Redevelopment Projects* – If a proposed redevelopment project leads to a net overall decrease in VMT (when compared against the VMT of the existing land uses), the project would lead to a less-than-significant transportation impact.
  Evaluation: This is a generally reasonable conclusion. However, in most instances, redevelopment occurs on sites that may not be operating at optimal levels (e.g., an underperforming mall or strip retail center). Hence, a question that must be answered pertains to whether the comparison should be based on the existing VMT of the site or VMT of the site if operating at full capacity. When the City receives an application to redevelop a large existing property, a detailed evaluation of this topic should occur.

- *Local Serving Retail* – Trip lengths may be shortened and VMT reduced by adding "local-serving" retail opportunities that improve retail destination proximity. Page 17 of the

Technical Advisory generally describes retail development including stores less than 50,000 square feet as locally-serving.
Evaluation: This screening test has been applied by numerous agencies throughout California since SB 743 was implemented. Some agencies have even increased the thresholds beyond 50,000 square feet.

2.2 VMT ASSESSMENT FOR NON-SCREENED DEVELOPMENT
Per the Guidelines, projects that do not meet any of the screening criteria identified would need to perform a VMT analysis. The project would need to evaluate the appropriate VMT metrics and compare them to the identified thresholds to determine the level of significance as defined per the Guidelines for the specific project land use type.

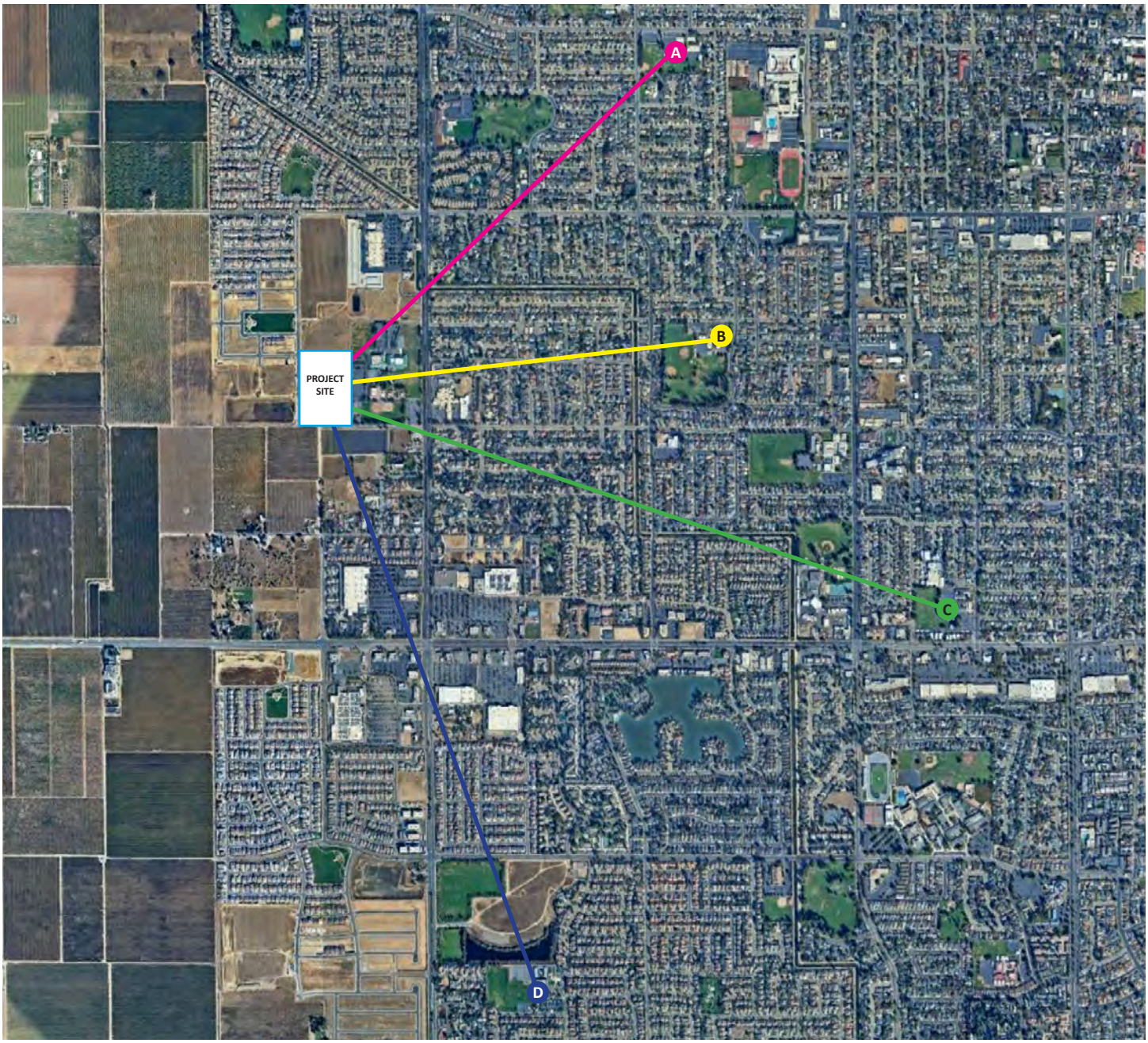
3.0 PROJECT VMT ASSESSMENT
The proposed school would involve the construction of a new kindergarten through 6th grade Public elementary school, with the potential to expand to 8th grade and increase enrollment to approximately 850 students at a future date.

3.1 SCREENING CRITERIA ASSESSMENT
The following is the screening criterion that is applicable to the proposed project:

Locally Serving Retail *– While the proposed public elementary school is not a retail use, the OPR Technical Advisory describes locally serving retail uses as those that "redistribute existing shopping trips rather than create new trips." In a similar manner, elementary schools function as locally serving community uses that primarily accommodate existing demand from nearby residential neighborhoods rather than generate new vehicle trips. The proposed school would serve the surrounding community, with residential developments located immediately to the north, south, and east of the Project site. As shown in* ***Figure 3-1****, there are four other elementary schools within approximately a two-mile radius of the Project site, indicating that the proposed school's service area would overlap with existing facilities. This overlap suggests that the Project would primarily redistribute existing school-related trips rather than induce new trips, effectively shortening travel distances for families within the area. As a result, the Project would reduce vehicle miles traveled (VMT) associated with these trips. Therefore, the Project* ***satisfies the intent of this screening criterion and should be presumed to have a less than significant VMT impact.***

Per the screening assessment above, the proposed project would be screened out based on Locally Serving criterion and presumed to have a less than significant VMT impact.

3.2 VMT ASSESSMENT CONCLUSION
As concluded in Section 3.1 of this report, the Project screens out since it behaves in the same manner as a Locally Serving Retail use with respect to VMT and; therefore, should be presumed to have a less than significant VMT impact. It is our recommendation that the project be approved with no additional project-level VMT analysis.



A- Erma B Reese Elementary School
B- Vinewood Elementary School
C- Leroy Nichols Elementary School
D- Ellerth E Larson Elementary School

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Gantner Public Elementary School
Proposed and Near-by School Locations
Figure 3-1