

Draft Initial Study/Mitigated Negative Declaration

Samuel M. Gantner Elementary School

FEBRUARY 2026

Prepared for:

Lodi Unified School District

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List of Acronyms

AB	Assembly Bill
ADA	American Disabilities Act
AFY	Acre-Feet per Year
APN	Accessor Parcel Number
ARB	Air Resources Board
BGS	Below ground surface
BMPs	Best management practices
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards Code
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CARB	California Air Resources Board
CCIC	Central California Information Center
CDFW	California Department of Fish and Wildlife
CEHC	California Essential Habitat Connectivity
CEQA	California Environmental Quality Act
CGS	California Geologic Survey
CHRIS	California Historical Resources Information System
City	City of Lodi
CNDDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CO	Carbon monoxide
dB	decibels
dBA	A-decibels
DTSC	Department of Toxic Substances Control
ESJGSP	Eastern San Joaquin Groundwater Sustainability Plan
EPA	Environmental Protection Agency

ERP	Emergency Response Plan
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
FTA	Federal Transit Administration
GHG	greenhouse gas
Hz	Hertz
IPaC	Information for Planning and Consultation
IS	Initial Study
ITMM	Incidental Take Mitigation Measure
LDN	Day-Night Average Sound Level
Leq	Equivalent Sound Level
LMC	Lodi Municipal Code
LN	Statistical Sound Level
LUSD	Lodi Unified School District
LWU	Lodi Water Utility
MGD	Million Gallons per Day
MLD	Most Likely Descendant
MND	Mitigated Negative Declaration
MRZ	Mineral Resource Zone
MS4	Municipal Separate Storm Sewer System
NAHC	Native American Heritage Commission
NOx	Nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NPS	National Park Service
NRIS	National Register Information System
OCP	Organochlorine Pesticides
PCi	Picocuries
PD	Planned Development

PG&E	Pacific Gas & Electric
PM	Particulate matter
PPD	pounds per day
PPV	Peak Particle Velocity
REC	Recognized Environmental Condition
School	Samuel M. Gantner Elementary School
SJMSCP	San Joaquin Multi-Species Habitat & Open Space Plan
SJVAPCD	San Joaquin Valley Air Pollution Control District
SLF	Sacred Lands File
SMARA	State Mining and Reclamation Act
SO2	Sulfur dioxide
SOI	Sphere of Influence
SR	State Route
SWPPP	Stormwater Pollution Prevention Plan
TAC	Toxic Air Contaminant
UBC	Uniform Building Code
USFWS	U.S. Fish and Wildlife Service
UWMP	Urban Water Management Plan
VMT	Vehicle Miles Traveled
WPCF	Water Pollution Control Facility
WSCP	Water Shortage Contingency Plan
WID	Woodbridge Irrigation District
WWTP	Wastewater Treatment Plant

1.0 Introduction

1.1 Project Overview

The Lodi Unified School District (LUSD) is proposing the construction and operation of a new elementary school located at 2801 West Vine Street, City of Lodi (City) in San Joaquin County, California (Assessor's Parcel Number (APN): 027-400-16). The proposed school would be located at the northeast corner of Vine Street and Westgate Drive, in the western area of Lodi. The school is initially proposed to serve kindergarten through 6th grade students with a potential expansion up to 8th grade. The maximum number of students would be approximately 850.

The facility will offer classroom education, outdoor recreation, and off-site opportunities, which will be supported by an administrative staff, facilities support staff, and teachers. The facility will include administrative and common use structures in addition to classrooms no greater than three stories in height. Elements included in design and project considerations are as follows:

- Access parking lots compliant with the American Disabilities Act (ADA)
- Access for emergency vehicles
- Construction specifications/operations compliant with required permit conditions
- Building specifications appropriate to soils characterizing site, consistent with ADA requirements, and consistent with noise level requirements
- Appropriate security lighting
- Drought resistant landscaping
- On-site water drainage system

1.2 California Environmental Quality Act

The LUSD is the lead California Environmental Quality Act (CEQA) agency responsible for review and approval of the proposed Samuel L. Gantner Elementary School (School) Project. Based on the findings of the Initial Study (IS), the LUSD has made the determination that a Mitigated Negative Declaration (MND) is the appropriate environmental document to be prepared in compliance with CEQA (California Public Resources Code, Section 21000 et seq.). As stated in CEQA Section 21064, an MND may be prepared for a project subject to CEQA when an IS has identified no potentially significant effects on the environment, and if necessary, incorporating mitigation measures to reduce any potential significant impacts.

This current proposed MND would replace previous evaluations of the proposed school which were considered originally in the City of Lodi Westside Annexation EIR (2006), and the LUSD prepared Negative Declaration for the proposed school in 2008.

1.3 Public Review Process

In accordance with CEQA, a good-faith effort has been made during preparation of this IS/MND to contact affected agencies, organizations, and persons who may have an interest in this project. In reviewing the IS/MND, affected public agencies and the interested public should focus on the sufficiency of the document in identifying and analyzing the project's possible impacts on the environment. A copy of the Draft IS/MND and related documents are available for review at the LUSD (see address below) between 8:00 a.m. and 5:00 p.m., Monday through Friday.

Lodi Unified School District
880 North Guild Avenue
Lodi, California 95240

The document is also available on the LUSD website at www.lodiusd.net

Comments on the Draft IS/MND may be made in writing before the end of the public review period. A 30-day review and comment period from February 14, 2026, to March 16, 2026, has been established in accordance with Section 15072(a) of the CEQA Guidelines. Following the close of the public comment period, the LUSD will consider this Draft IS/MND and comments thereto in determining whether to approve the proposed project.

1.4 Project Approvals

The actions and/or approvals that LUSD needs to consider for the Project include, but are not limited to, the following (this list is preliminary, and may not be comprehensive):

- Adoption of the Initial Study/Mitigated Negative Declaration (IS/MND)
- Division of the State Architect – Title 24 structural, access compliance, fire/life safety, and energy reviews.
- State Fire Marshal – Fire/Life Safety.
- Department of Toxic Substances Control – Soil remediation and monitoring (if necessary).
- State Public Works Board.

Subsequent non-discretionary approvals (which would require separate processing through the LUSD) would include, but may not be limited to a grading permit, building permits, and occupancy permits.

2.0 Project Description

2.1 Project Location

The proposed school site is located at 2801 West Vine Street, in Lodi, San Joaquin County, California. This location is the northeast corner of West Vine Street and Westgate Drive (APN 027-400-16). The site is approximately 12 acres in size and is currently vacant (Figure 2.1-2). The school site is approximately 2.80 miles west of Highway 99, and approximately 0.50 miles north of Highway 12 (West Kettleman Lane). Nearby communities include Acampo, Clements, Lockeford, Stockton, Victor, and Woodbridge (Figure 2.1-1).

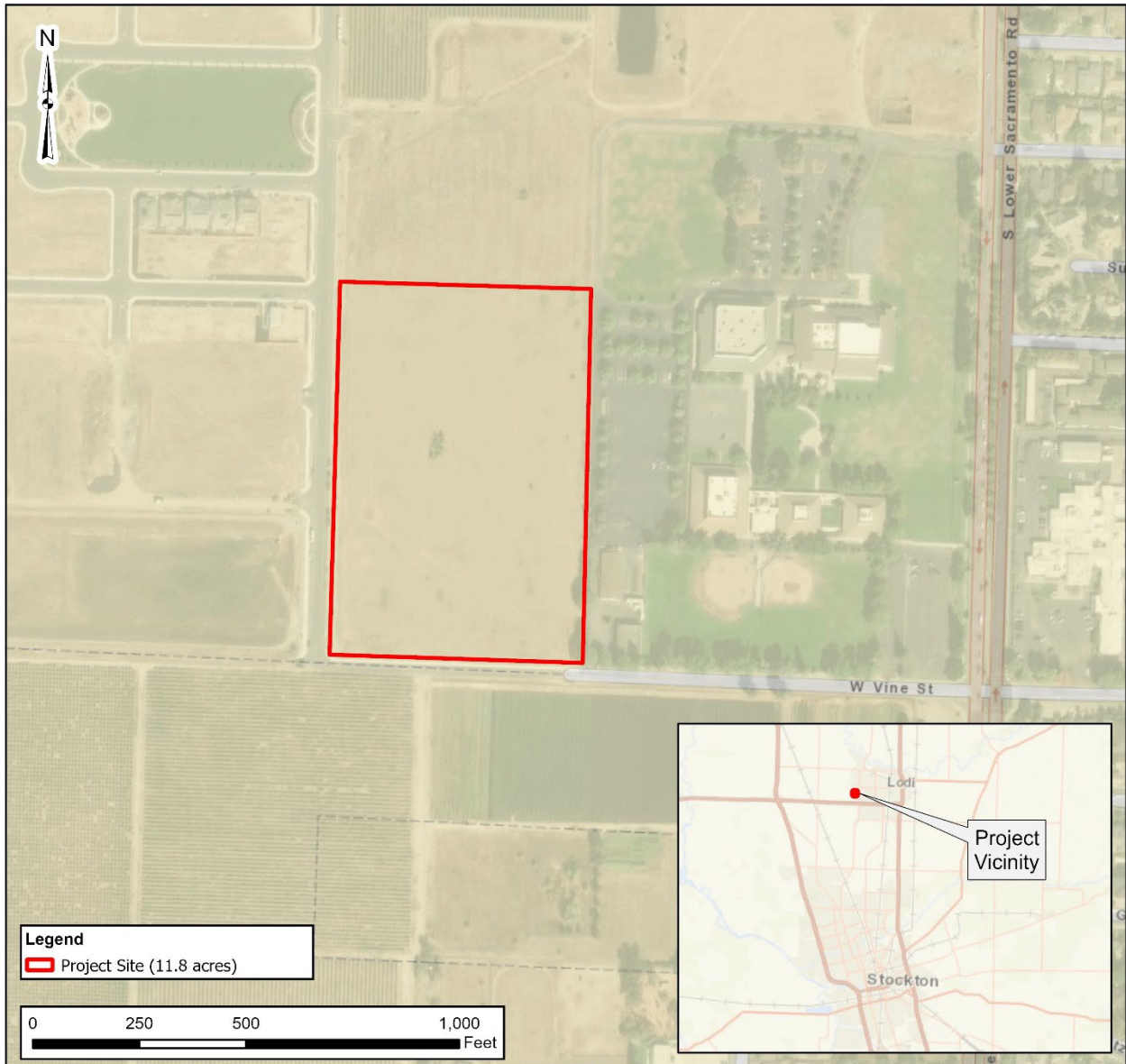


Figure 2.1-1. Regional Map



Figure 2.1-2. Project Site

2.2 Environmental Setting

The proposed school site is located in western Lodi, in an area transitioning from agricultural uses to residential and commercial uses. The local area has a generally flat topography with access via both Vine Street and Westgate Drive. The proposed school is adjacent, on the east, to the Grace Point Church campus and John Elliot Christian High School campus, to the north, and west, the land is currently vacant but planned for development, and to the south the land is currently undeveloped. The City of Lodi General Plan Land Use Map (2025) designates the proposed school site as "Planned Development".

2.3 Project Characteristics

2.3.1 Proposed Project

The proposed school would involve the construction of a new kindergarten through 6th grade elementary school, with the potential to expand to serving up 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. 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.

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 is anticipated with approximately 10 classrooms. Restrooms would also be included with separate facilities for staff and students (see Figure 2.3-1 and Figure 2.3-2).

Walkways would allow 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

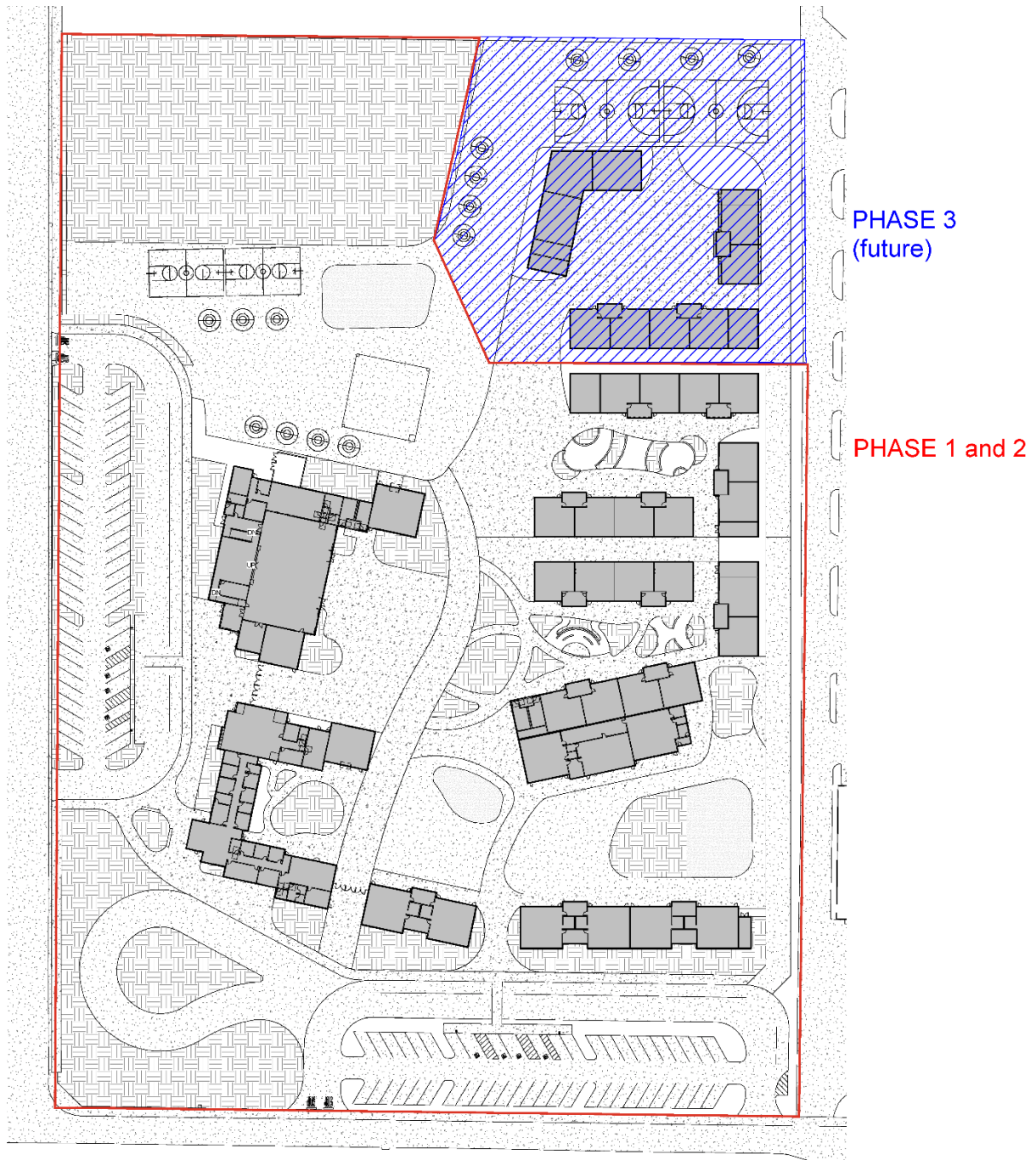


Figure 2.3-2. Close-Up of Project Campus Site Plan

2.3.2 Proposed Operation

The proposed elementary school is anticipated to operate as a kindergarten through 8th Grade school utilizing a traditional schedule (August through June). Monday through Friday during a regular school day (generally 6:30 am to 4:00 pm), approximately 850 students, teachers, administrators, and staff will travel to and from the proposed school site. Typically, during the day, instruction will occur indoors with occasional exchange of classrooms, with potentially outdoor breaks for recess, lunch, and physical education. The operation of the school will not include the use of large-sized generators, compressors, or pumps. Nor will the school include a venue for organized sports with high intensity lighting.

2.3.3 Proposed Construction

The Project will be built in three phases, with the first two phases constructed concurrently, and the third phase constructed in the future when the school expands to full capacity. Construction of the Project will include site preparation, grading, underground utility construction (trenching), building construction, and architectural coating. For the purposes of this analysis, it is assumed that construction of the Project will commence in June 2026 and will last approximately 24 months. Construction activities will occur during weekdays (Monday through Friday from 7:00am to 7:00pm).

Site preparation will involve site clearing and rough grading. After grading, there will be trenching of soil for the placement of underground utilities. Building construction will involve the construction of the proposed building and associated exterior hardscape features (i.e., sidewalks, access ramps, stairways). The paving phase will involve paving walkways and hardscape around the building. The architectural coating phase will involve the application of interior and exterior paints and coatings.

3.0 Initial Study Checklist

1. Project title:

Samual M. Gantner Elementary School

2. Lead agency name and address:

Lodi Unified School District

880 North Guild Avenue

Lodi, California 95240

3. Contact person and phone number:

Amberly Kidder, Planning Analyst/Facilities and Planning

(209) 331-7225

4. Project location:

2801 West Vine Street

Lodi, California 95240

5. Project sponsor's name and address:

Lodi Unified School District

880 North Guild Avenue

Lodi, California 95240

6. General plan designation:

Public/Quasi-Public

7. Zoning:

Planned Development (PD)(42)

8. 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. Attach additional sheets if necessary):

See Section 2.3, Project Characteristics.

9. Surrounding land uses and setting (Briefly describe the Project's surroundings):

See Section 2.2, Environmental Setting.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

See Section 1.4, Project Approvals.

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

Yes. See Section 3.18, Tribal Cultural Resources.

Environmental Factors Potentially Affected

The environmental factors checked below will 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.

- | | | |
|--|--|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agricultural and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Geology and Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards and Hazardous Materials |
| <input type="checkbox"/> Hydrology and Water Quality | <input type="checkbox"/> Land Use and Planning | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Population and Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings of Significance |

Determination (To be completed by the Lead Agency)

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 revisions in the Project have been made by or agreed to by the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed Project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required.

Signature

Date

Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there 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 "Earlier Analyses," as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures 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). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a Project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
 - a. the significance criteria or threshold, if any, used to evaluate each question; and
 - b. the mitigation measure identified, if any, to reduce the impact to less than significance

3.1 Aesthetics

Issues	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS – Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>

a) Have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. The 2009 Certified General Plan EIR indicated that the relatively flat topography results in few scenic vistas in the City. In some areas views consist of adjacent farmland in other areas residential and commercial buildings restrict views of the Mokelumne River and the Lodi Lake Wilderness Area. Distant views of Mount Diablo to the southwest and Sierra Nevada foothills to the east exist. However, given the distance, topography, and development, views of Mount Diablo and the Sierra Nevada foothills are partially obstructed.

The location of the proposed Project would not result in substantial impacts on public views. While the increase in development on the site and surrounding areas may limit local views, it will not impact the distant landscape views. Therefore, the proposed Project would result in less than significant impacts and no mitigation is required.

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

No Impact. According to the California Scenic Highway Mapping System, there are no state-designated scenic highways in Lodi (Caltrans 2019). The closest designated scenic highway is State Route 160 (SR 160) in Sacramento County, approximately 11 miles northwest of the City. Therefore, future development pursuant to the proposed Project would not degrade scenic

resources within SR 160, given the intervening distance, varying topography, and development. No impacts would occur and no mitigation is required.

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

Less Than Significant Impact. The General Plan EIR states that development under the General Plan had the potential to result in beneficial changes to Lodi's visual character by maintaining and enhancing the urban areas.

The proposed land use changes would generally be consistent with the existing development pattern. Primary changes to the visual character of the City would be the addition of new buildings, streets, and other urban development. Future development under the proposed Project would be required to comply with the General Plan Update policies and the City's zoning and development codes to ensure scenic quality and visual character are not degraded. The City will review future Project plans to ensure consistency with objective design standards, specific plans, and applicable regulations and codes to ensure that future development would neither conflict with applicable zoning governing scenic quality nor degrade the existing visual character. While development in the form of buildings, parking lots, landscaping, lighting, and other urban amenities would increase under the proposed Project, land designated as Open Space would also increase, thereby maintaining the City and surrounding areas' visual character. Therefore, impacts would be less than significant and no mitigation is required.

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

Less Than Significant Impact. The General Plan EIR stated that development would include interior and exterior lighting that could be visible from a distance at night. Future development in accordance with the General Plan Update would allow for the development of currently undeveloped parcels, and alteration, intensification, and redistribution of existing land uses. As such, future development has the potential to introduce new sources of light and glare that could adversely affect day or nighttime views in the area. Section 17.14.070, Lighting, of the Lodi Municipal Code includes provisions for exterior lighting on private property, such as shielding light fixtures, which would reduce light and glare impacts. Additionally, the General Plan Update includes Policy CD-P32, which states that lighting from new development shall be designed to prevent artificial lighting from illuminating adjacent residential neighborhoods and natural areas at a level greater than one foot-candle above ambient conditions. This policy would ensure that the impacts of light and glare from future development would be kept within the boundaries of new development, and therefore, impacts from the proposed Project would be less than significant and no mitigation is required.

3.2 Agricultural and Forestry Resources

Issues	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>II. AGRICULTURAL AND FORESTRY RESOURCES – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</p>				
<p>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?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>d) Result in the loss of forest land or conversion of forest land to non-forest use?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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?

No Impact. Based on farmland maps prepared by the California Department of Conservation, the Project site is located on “Vacant or Disturbed Land” and therefore not located in an area designated

as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (DOC, 2022). Therefore, the Project would not convert farmland into non-agricultural use, and no impact would result and no mitigation is required.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. According to the California Department of Conservation's Williamson Act Parcel Map for San Joaquin County, the Project is not located on or adjacent to any lands under a Williamson Act contract (DOC, 2024). The closest land under Williamson Act contract is located south of Vine Street. Therefore, the Project would not conflict with land designated as under Williamson Act contract, resulting in no impact and no mitigation is required.

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

No Impact. The Project site currently has a General Plan designation of "Planned Development" (Lodi, 2025). Therefore, no impacts associated with forest land or timberland would occur and no mitigation is required.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The Project site is located in a developing area of the City. The Project site is not located on, or adjacent to, forest land. No private timberlands or public lands with forests are located within the City. Therefore, no impact associated with the loss or conversion of forest land would occur and no mitigation is required.

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

No Impact. As previously discussed, the Project is located in a developing area of the City. The Project is not located on parcels as identified as Important Farmland or forest land. In addition, the proposed Project would not involve changes to the existing environment that would result in the indirect conversion of Important Farmland or forest land located away from the Project site. Therefore, no impacts associated with the conversion of Farmland or forest land would occur and no mitigation is required.

3.3 Air Quality

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

An Air Quality, Greenhouse Gas, and Energy Impact Study, dated January 15, 2026, was prepared for the Project site by MD Acoustics (Appendix A). Potential air quality impacts were assessed using the California Emissions Estimator Model (CalEEMod) program (Version 2022.1.1.31) to quantify potential criteria pollutant and greenhouse gas emissions using regional data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.). The analysis included short-term construction and long-term operational emissions associated with the proposed Project.

a) Conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. Air pollutants are regulated at the national, state, and air basin level; each agency has a different level of regulatory responsibility. The United States Environmental Protection Agency (EPA) regulates at the national level. The California Air Resources Board (ARB) regulates at the state level. The San Joaquin Valley Air Pollution Control District (SJVAPCD) regulates at the air basin level. The SJVAPCD jurisdiction includes all of Merced, San Joaquin, Stanislaus, Madera, Fresno, Kings, and Tulare Counties, and the San Joaquin Valley portion of Kern County.

The SJVAPCD has prepared several air quality attainment plans to achieve the ozone and particulate matter (PM) standards, the most recent of which include the 2020 Reasonably Available Control Technology Demonstration for the 2015 8-Hour Ozone Standard (SJVAPCD 2020a) and various others. According to the SJVAPCD, a project is non-conforming if it conflicts with or delays implementation of any applicable attainment or maintenance plan. A project is conforming if it complies with all applicable SJVAPCD rules and regulations, complies with all proposed control measures that are not yet adopted from the applicable plan(s), and it is consistent with the growth forecasts in the applicable plan(s) (or is directly included in the applicable plan).

Violation of Air Quality Standards or Substantial Contribution to Air Quality Violations. SJVAPCD currently recommends that projects with construction-related and/or operational emissions that exceed any of the following emissions thresholds listed in Table 3.3-1 should be considered significant:

Table 3.3-1. SJVAPCD Air Quality Significance Thresholds

Pollutant	Annual Thresholds (tons/year)
NOx	10
VOC	10
PM10	15
PM2.5	15
SOx	27
CO	100

Source: Air Quality Impact Study (Appendix A)

The latest version of CalEEMod was used to estimate the onsite and offsite construction emissions. The emissions incorporate Regulation VIII (fugitive dust), which is not considered a mitigation measure as the project by default is required to incorporate this rule during construction. Table 3.3-2 provides the anticipated regional construction emissions for the Project.

Table 3.3-2. Regional Significance – Construction Emissions (tons/year)

Activity	Pollutant Emissions (tons/year)					
	VOC	NOx	CO	SO2	PM10	PM2.5
2026	0.09	0.91	0.93	0.00	0.16	0.08
2027	0.15	1.30	1.80	0.00	0.09	0.05
2028	0.24	0.05	0.08	0.00	0.00	0.00
Total	0.48	2.26	2.81	0.00	0.25	0.13
SJVAPCD Thresholds	10	10	100	27	15	15
Exceeds Thresholds	No	No	No	No	No	No

Notes:

¹ Source: CalEEMod Version 2022.1.1.36

² On-site emissions from equipment operated on-site that is no operated on public roads. On-site grading PM-10 and PM-2.5 emissions show mitigated values for fugitive dust for compliance with SJVAPCD Regulation VIII.

³ Off-site emissions from equipment operated on public roads.

⁴ Construction, architectural coatings and paving phases may overlap.

The construction emissions for the project would not exceed SJVAPCD annual emissions thresholds as demonstrated in Table 3.3-2, and therefore would be considered less than significant and no mitigation is required.

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

Less Than Significant Impact. Cumulative projects include local development as well as general growth within the project area. However, as with most development, the greatest source of emissions is from mobile sources, which travel well out of the local area. Therefore, from an air quality standpoint, the cumulative analysis would extend beyond any local projects and when wind patterns are considered, would cover an even larger area. Accordingly, the cumulative analysis for the project's air quality must be generic by nature.

The area that encompasses the Project is out of attainment for both ozone and particulate matter. Construction and operation of cumulative projects will further degrade the air quality of the San Joaquin Valley Air Basin. The greatest cumulative impact on the quality of regional air cell will be the incremental addition of pollutants mainly from increased traffic from residential, commercial, and industrial development and the use of heavy equipment and trucks associated with the construction of these projects. Air quality will be temporarily degraded during construction activities that occur separately or simultaneously. However, in accordance with the SJVAPCD methodology, projects that do not exceed the SJVAPCD criteria or can be mitigated to less than criteria levels are not significant and do not add to the overall cumulative impact.

Project operations would generate emissions of nitrogen oxides (NO_x), reactive organic gases, carbon monoxide (CO), sulfur dioxide (SO₂), PM₁₀, and PM_{2.5}, which would not exceed the SJVAPCD regional thresholds and would not be expected to result in ground level concentrations that exceed the NAAQS or CAAQS. Therefore, operation of the project would not result in a cumulatively considerable net increase for non-attainment of criteria pollutants or ozone precursors. As a result, the project would result in a less than significant cumulative impact for operational emissions and no mitigation is required.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Sensitive receptors are described as residences, schools, daycare centers, playgrounds, medical facilities, or other facilities that may house individuals with health conditions (medical patients or elderly persons/athletes/students/children) that may be adversely affected by changes in air quality. The closest existing sensitive receptors (to the site area) are the church 30 feet to the east and the residences 125 feet to the west. Impacts to sensitive receptors are typically analyzed for operational period CO hot spots and exposure to Toxic Air Contaminants (TACs). An analysis of the project's potential to expose sensitive receptors to these pollutants is provided below.

Carbon Monoxide Hot Spots

A CO hot spot is an area of localized CO pollution caused by severe vehicle congestion on major roadways, typically near intersections. The Project would not expand the capacity of Westgate Drive or Vine Street beyond the existing conditions and would not generate additional trips or vehicle miles traveled (VMT). Thus, the Project would neither cause new severe congestion nor significantly worsen existing congestion. There would be no potential for a CO hot spot or exposure of sensitive receptors to substantial, project generated, local CO emissions. The impact would be less than significant, and no mitigation is required.

Toxic Air Contaminants

Construction of the Project would result in the use of heavy-duty construction equipment, haul trucks, and construction worker vehicles. These vehicles and equipment could generate PM, which is a TAC. Generation of PM from construction projects typically occurs in a localized area (e.g., near locations with multiple pieces of heavy construction equipment working in close proximity) for a short period of time. Because construction activities and subsequent emissions vary depending on the phase of construction, the construction-related emissions to which nearby receptors are exposed to would also vary throughout the construction period. Concentrations of PM emissions are typically reduced by 70 percent at approximately 500 feet (CARB 2005).

The dose of TACs to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance in the environment and the extent of exposure a person has to the substance; a longer exposure period to a fixed amount of emissions would result in higher health risks. Current models and methodologies for conducting cancer health risk assessments are associated with longer-term exposure periods (typically 30 years for individual residents based on guidance from OEHHA) and are best suited for evaluation of long-duration TAC emissions with predictable schedules and locations. These assessment models and methodologies do not correlate well with the temporary and highly variable nature of construction activities. Cancer potency factors are based on animal lifetime studies or worker studies where there is long-term exposure to the carcinogenic agent. There is considerable uncertainty in trying to evaluate the cancer risk from projects that will only last a small fraction of a lifetime (OEHHA 2015). Considering this information, the fact that any concentrated use of heavy construction equipment would occur at various locations throughout the project site only for short durations, construction of the project would not expose sensitive receptors to substantial PM concentrations, and the impact would be less than significant and no mitigation is required.

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

Less Than Significant Impact. The evaluation of other emissions is focused on the potential for the Project to generate odors. The occurrence and severity of potential odor impacts depend on numerous factors: the nature, frequency, and intensity of the source; the wind speeds and direction; and the sensitivity of receiving location each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying and cause distress among the public and generate citizen complaints.

Odors will be potentially generated from application of asphalt pavement and exhaust emissions from vehicles and equipment during construction of the Project. Potential odors produced during construction will be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment, architectural coatings, and asphalt pavement application. Such odors will disperse rapidly from the Project site and generally occur at magnitudes that will not affect substantial numbers of people. Therefore, impacts associated with odors during construction will be less than significant and no mitigation is required.

Land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding facilities (SJVAPCD 2025). The Project entails operation of an elementary school, which is not a land use that is associated with the creation of unwanted odors. Therefore, Project operations will result in an odor impact that is less than significant and no mitigation is required.

3.4 Biological Resources

Issues	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	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 Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 ordinances 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"/>

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

Less Than Significant Impact with Mitigation Incorporated. Special status species include plant and/or wildlife species that are legally protected under the federal Endangered Species Act,

and the California Endangered Species Act, or other regulations, or are considered rare enough by the scientific community and trustee agencies to warrant special consideration (SJCOG, 2000).

A Threatened and Endangered Species Assessment, dated June 1, 2025, was prepared for the Project site by Terracon Consultants, Inc. (Appendix B). The Project site is referenced in the Habitat Assessment as the "Study Area" and comprises an approximately 12-acre area that consists of a vacant rectangular shaped lot, on a parcel adjacent to the Grace Point Church campus and the John Elliot Christian High School campus. The Project site had been heavily disturbed with previous agricultural uses. Therefore, the site is not expected to support plants and wildlife beyond what currently exists. While the Project site itself may have previously provided habitat for special-status wildlife species in the past, historical farming and urban development have substantially modified natural habitats in the greater project vicinity. Nonetheless, there are a few trees in the southeast corner of the Project site, one of which contained active nesting birds during the field visit.

Plant Species

The records search of the Information for Planning and Consultation (IPaC) database did identify one plant species that is federally threatened and state-listed as endangered, the fleshy owl's-clover (*Castilleja campestris* spp. *succulenta*), with the potential to be present on the project site. The California Natural Diversity Database (CNDDDB) occurrence search additionally identified one other plant species that is both federally and state-listed as endangered: the palmate-bracted bird's beak (*Cordylanthus palmatus*). Neither species was present during the field visit, and no suitable habitat was identified on the Project site.

The site visit identified vegetation that was primarily along the margins of the site and included yellow star thistle (*Centaurea solstitialis*), shortpod mustard (*Hirschfeldia*), tree of heaven (*Ailanthus altissima*), common stork's-bill (*Erodium cicutarium*), doveweed (*Croton setigerus*), field bindweed (*Convolvulus arvensis*), Himalayan blackberry (*Rubus armeniacus*), prickly Russian thistle (*Salsola tragus*), horseweed (*Erigeron canadensis*), telegraph weed (*Heterotheca grandiflora*), oleander (*Nerium oleander*), ash tree (*Fraxinus* sp.), and brome grass (*Bromus* sp.). None of the identified species were considered sensitive.

Wildlife Species

The wildlife species observed within the Project site include; California scrub jay (*Aphelocoma californica*), lesser goldfinch (*Spinus psaltria*), cliff swallow (*Petrochelidon pyrrhonota*), European starling (*Sturnus vulgaris*), red-tailed hawk (*Buteo jamaicensis*), western kingbird (*Tyrannus verticalis*), northern mockingbird (*Mimus polyglottos*), red-shouldered hawk (*Buteo lineatus*), killdeer (*Charadrius vociferus*), house finch (*Haemorhous mexicanus*), and western fence lizard (*Sceloporus occidentalis*). An active nest belonging to a western kingbird (*Tyrannus verticalis*) pair was observed in a mature ash tree adjacent to the southeastern corner of the project site.

No wildlife species listed or proposed for listing as rare, threatened, or endangered by the California Department of Fish and Wildlife (CDFW) or United States Fish and Wildlife Service (USFWS) were detected within the Study Area during the on-site survey in June 2025. Additionally, there is no USFWS-designated critical habitat for listed wildlife species within the Project site. As a result, direct and indirect impacts to special-status wildlife species will be less than significant.

The Project site, and adjacent areas, contains trees, shrubs, and bare ground that will potentially be used by migratory birds for nesting. As a result of the field observations, there is a significant impact

to nesting birds requiring mitigation. **Mitigation Measure BIO-1** shall be implemented to ensure no impacts to nesting birds occur if construction is scheduled to take place during the typical nesting bird season (January 1 – September 15).

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

No Impact. The proposed Project site is located entirely on disturbed/developed land and does not contain any riverine features, riparian vegetation, or other sensitive natural community identified in local or regional plans, policies, regulations or by CDFW or USFWS. The site consisted primarily of common species where there was vegetation present (Appendix B). Therefore, there is no impact and no mitigation is required.

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

No Impact. The Project site does not contain any state or federally protected wetlands. Additionally, no riverine features, vernal pool resources, seasonal depressions, or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS were documented on site (Appendix B). Therefore, there is no impact and no mitigation is required.

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?

Less Than Significant Impact. The Project site is not located within a California Essential Habitat Connectivity (CEHC) area and does not function as a wildlife movement or migration corridor (CDFW 2025). The site is currently vacant in a developing area of Lodi and is not located between sensitive habitats that would create the potential for a migration corridor. Therefore, there is no impact and no mitigation is required.

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

Less Than Significant Impact. The City has an ordinance related to trees on private land and in the public right of way (Chapter 307). "It is the policy of the City of Lodi to promote and enhance the beauty and general welfare of the City through planting and maintenance of trees or shrubs in the public right-of-way of any street, alley or highway." The Project site has trees very close to the Project's southeast corner. Currently, it is assumed that these trees belong to the adjacent parcel since they are next to the entry driveway for that parcel. The Project will not conflict with local policies or ordinances related to biological resources, and there will be a less than significant impact and no mitigation is required.

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?

Less Than Significant Impact. The SJMSCP is a multi-species, multi-habitat, multi-purpose open space management program for all of San Joaquin County. The SJMSCP is a 50-year Plan (2001 – 2051) that 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 Plan also includes some

compensation to offset the impacts of open space conversions on non-wildlife related resources such as recreation, agriculture, scenic values, and other beneficial open space. The SJMSCP provides three compensation methods: preservation of existing sensitive lands, creation of new comparable habitat on the project site, or payment of fees that would be used to secure preserve lands outside the project site. In addition to fee payments, the SJMSCP identifies and requires the applicants to abide by Incidental Take Minimization Measures (ITMMs), which are protection measures that avoid direct impacts of development on special-status species (SJCOG 2000). The SJCOG implements the SJMSCP on a project-by-project basis, however, the LUSD is not a participant in the SJMSCP and would not be subject to the requirements of the plan. Since the Project does not require compliance with the SJMCP, impacts would be less than significant and no mitigation required.

Mitigation Measures

Mitigation Measure BIO-1:

Pre-Construction Nesting Bird Surveys. In the event of vegetation clearing, cutting, or removal activities taking place during the nesting season (January 1 – September 15), a qualified biologist shall conduct a nesting bird survey within 72 hours prior of such activities. The survey shall consist of full coverage of the Project footprint and an appropriate buffer, as determined by the biologist. If no occupied nests are found, no additional steps shall be required. If an active nest is observed, a qualified biologist shall be designated as the biological monitor. This monitor shall be required to be on-site at all times during activities involving vegetation clearance or ground disturbance. Their primary responsibility shall be to ensure that potential impacts on biological resources are either avoided or minimized to the greatest extent possible, including establishing an appropriate buffer around the active nest. No construction or ground-disturbing activities shall be conducted within the buffer until the biologist has determined that the nest is no longer being used for breeding or rearing.

3.5 Cultural Resources

Issues	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	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 pursuant to § 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The following analysis is based on the Cultural Resources Desktop Review for the Samuel M. Gantner Elementary School, City of Lodi, San Joaquin County, California, prepared by Terracon, May 20, 2025, and included as Appendix C.

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

Less Than Significant with Mitigation Incorporated. CEQA Guidelines Section 15064.5 provides that a historic resource need not only include such resources already identified as being listed on the California Register of Historic Resources but may include such resources deemed by the lead agency to be eligible for such a listing. It can be a structure, building, place, or area that may have been associated with an event or person, or it may represent distinctive characteristics of a type, period, region, or method of construction; or it may reveal additional information important to our understanding of history. Thus, there are any number of potential qualities that would identify an area as a potential historic resource.

A California Historical Resources Information System (CHRIS) records search was conducted at the Central California Information Center (CCIC), at California State University Stanislaus to assist in the identification of historical resources in proximity of the Project site. The CCIC search included the CCIC collection of mapped prehistoric, historical and built environment resources, technical reports, archival resources, ethnographic references, and Department of Parks and Recreation Site Records. Additional consulted sources included the National Park Service (NPS) National Register Information System (NRIS), and historic USGS topographic maps, atlases, and aerial photography.

The CHRIS records search identified no archaeological sites within the Project site, and eight cultural resources within the 0.5-mile search radius. One of these reports encompasses the entirety of the Project site. This previous report included a pedestrian survey that disclosed that no cultural resources or material were observed within the Project site.

Although the current study did not indicate sensitivity for cultural resources (historical or archaeological) within the Project boundaries, ground-disturbing activities have the potential to

reveal buried deposits not observed on the surface during previous surveys. For this reason, **Mitigation Measure CR-1** is applicable. With the implementation of **Mitigation Measure CR-1**, impacts to cultural resources will be less than significant.

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

Less Than Significant with Mitigation Incorporated. The Cultural Resources Desktop Review for the Proposed Samuel M. Gantner School did not identify any archeological resources on the Project site. The analysis revealed that the potential for unrecorded cultural resources to exist within the Project site is considered low based on the following factors: (1) though the topography and natural features that surround the Project site are conducive to supporting prehistoric occupation, archival review and existing Project site conditions determined that the Proposed project site has been routinely disturbed since at least the mid-twentieth century and has remained undeveloped land for at least 75 years; (2) it is unlikely that prehistoric sites would be encountered with the project site has no topographic features such as water sources or bedrock outcrops are present that would suggest an area that may have been attractive to prehistoric inhabitants; (3) results of the study indicate that no built environment structures or associated facilities occupied the Project site since at least the late twentieth century, suggesting that the possibility of buried historic are archeological deposits associated with once extant structures is considered low. Given these factors the Project site is considered relatively low sensitivity for the presence of cultural resources.

Although no significant archaeological deposits were present on the proposed Project site, ground disturbing activities have the potential to reveal buried deposits not observed on the surface during field surveys. For this reason, **Mitigation Measure CR-1** is applicable. With the implementation of **Mitigation Measure CR-1**, impacts to archaeological resources will be less than significant.

c) Disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact with Mitigation Incorporated. There are no previously recorded cultural resources on the Project site. Since the site has been previously disturbed, ground-disturbing activities associated with construction of the proposed structures are unlikely to uncover previously unknown cultural resources. However, if human skeletal remains are discovered during ground-disturbing activities, California Health and Safety Code Section 7050.5 states that the County Coroner must be immediately notified of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains can occur until the County Coroner has determined, within 2 working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she must notify the Native American Heritage Commission (NAHC) in Sacramento within 24 hours. In accordance with California Public Resources Code Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant must complete his or her inspection within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the property owner, the disposition for the human remains. Therefore, impacts related to human remains outside of dedicated cemeteries is less than significant and with implementation of **Mitigation Measure CR-2**.

Mitigation Measures

Mitigation Measure CR-1:

Inadvertent Discovery Clause. In the event that potential prehistoric or historic-era archaeological resources and/or Tribal Cultural Resources (sites, features, or artifacts) of cultural significance to local Native American groups, such as the United Auburn Indian Community and Confederated Villages of Lisjan Nation, are exposed during construction activities for the Project, all construction work occurring within 50 feet of the find shall immediately stop. A qualified archaeologist, Tribal Monitor, and LUSD must be notified immediately to assess the significance of the find and determine if the find is a Tribal Cultural Resource (PRC §21074). The Tribal Representatives shall make recommendations in a timely manner for further evaluation and treatment as necessary. If the discovery proves significant under CEQA, additional work (e.g., preparation of an archaeological treatment plan, testing, or data recovery) may be warranted.

Mitigation Measure CR-2:

Unanticipated Discovery of Human Remains. If human remains are encountered during activities associated with the proposed Project, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC.

3.6 Energy

Issues	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. ENERGY - Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Less Than Significant Impact. Construction energy consumption is associated with construction equipment and vehicles. The proposed Project will require construction equipment and vehicles to limit idling time to 5 minutes or less. Therefore, fuel consumption associated with the proposed Project would not result in inefficient, wasteful, or unnecessary consumption of energy resources during project construction. This is considered a less than significant impact for construction.

The school is designed to operate on electricity only with no natural gas connections. This will result in a lesser environmental impact than with a natural gas connection, resulting in a less than significant impact for operation of the school and no mitigation is required.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. The proposed Project would be subject to and would comply with, at minimum, the California Building Code Title 24 (24 CCR, Part 6). Additionally, the proposed Project would also not conflict with CARB's Climate Change Scoping Plan, which identifies several strategies to reduce greenhouse gas (GHG) emissions through energy efficiency. The proposed Project would not be subject to these strategies, as many are state actions requiring no involvement at the project level. As such, implementation of the proposed Project would not conflict with applicable plans for energy efficiency, and the impacts during construction and operation would be less than significant and no mitigation is required.

The proposed Project would not conflict with existing energy standards and regulations; therefore, impacts during construction and operation of the proposed project would be less than significant and no mitigation is required.

3.7 Geology and Soils

Issues	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS - Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: <ul style="list-style-type: none"> i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. ii) Strong seismic ground shaking? iii) Seismic-related ground failure, including liquefaction? iv) Landslides? 	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water 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"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

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

Less than Significant Impact. The subject site is located in the California Central Valley Area, which is a relatively low to moderate seismically active area. The Project area is not listed within a State designated Alquist-Priolo Earthquake Fault Zone (CDOC, 2019). There are no mapped surface or subsurface faults that traverse the Project area per review of Fault-Rupture Hazard Zones in California, Special Publication 42. No indication of surface rupture or fault-related surface disturbance was observed at the site during Phase I reconnaissance, or review of aerial photographs (Terracon, 2025). Construction will be required to meet the design standards set forth in the 2022 editions of the California Building Code (Title 24 of the California Code of Regulations) which should be sufficient to prevent significant damage from ground shaking events. Therefore, this is considered a less than significant impact and no mitigation is required.

ii) Strong seismic ground shaking?

Less than Significant. In general, strong ground shaking from an earthquake is the cause of most seismic ground shaking damage. The California Building Code Site Classification for the proposed Project site is D, corresponding to a stiff soil profile. As stated above, the proposed Project is not located within an Alquist-Priolo Earthquake Fault Zone. Construction will be required to meet the seismic design criteria in accordance with the 2022 California Building Code Seismic Design Parameters. Based on the design standards required, the Project being located outside an Alquist Priolo Earthquake Fault Zone, ground shaking is considered less than significant and no mitigation is required.

iii) Seismic-related ground failure, including liquefaction?

Less than Significant Impact. Liquefaction is a mode of ground failure that results from the generation of excess pore-water pressures during earthquake ground shaking, causing loss of shear strength. This phenomenon generally occurs in areas of high seismicity, where groundwater is shallow, and soils are loose and granular. Strong seismic shaking can also cause cyclic softening of saturated relatively non-plastic fine grained soils. The California Geologic Survey (CGS) has designated certain areas within California as potential liquefaction hazard zones. These are areas considered at risk of liquefaction-related ground failure during a seismic event, based upon mapped surficial deposits and the likely presence of a relatively shallow water table. The California Department of Conservation has not identified any liquefaction hazard zones in the Lodi area (CGS, 2024). Therefore, the impact is less than significant and no mitigation is required.

iv) Landslides?

No Impact. The Project area is located on geographically level terrain (average grade less than five degrees) considered insufficient to produce a landslide. There are no slopes in the immediate or general area. As a result, no impacts related to landslides are anticipated and no mitigation is required.

b) Result in substantial soil erosion or the loss of topsoil?

Construction Impacts

Less Than Significant Impact. Construction activities such as grading may have the potential to cause soil erosion or the loss of topsoil. The Project area is greater than one acre and would therefore require compliance with the California State Water Resource Control Board – 2022 Construction General Permit (SWRCB, 2022). This permit has a series of requirements for Project sites both under construction and post construction stabilization. Among the required items that must be included within a water pollution control program are Project Design Features intended to protect against substantial soil erosion as a result of water and wind erosion, commonly known as best management practices (BMPs). Through the incorporation of BMPs, impacts associated with soil erosion would be less than significant and no mitigation is required.

Operational Impacts

Less Than Significant Impact. Once developed, the Project site would include an elementary school with structures, landscaped areas, impervious walkways, and activity areas, both paved and unpaved. The drainage will be designed to minimize runoff from the stabilized landscaped areas. The stabilized landscape areas and pervious activity areas would be designed to limit erosion and retain on-site soils. Therefore, long-term operational impacts associated with soil erosion would be less than significant and no mitigation is required.

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?

Less Than Significant Impact. The Project site consists of Tohay fine sandy loam with a slope of between 1 and 2 percent (USDA-USCS, 2025). Tokay fine sandy loam is a Class B soil which means it has moderate infiltration rates and is typically well drained. These soils have intermediate water holding capacity with a depth to water table of more than 6 feet. This type of soil at this location is not unstable and would not become unstable as a result of an earthquake, landslide, liquefaction, lateral spreading or subsidence. Additionally, the proposed Project would be designed in accordance with applicable provisions established in the current California Building Code, which sets forth specific engineering requirements to ensure structural integrity, regardless of the specific characteristics of the underlying soils. Compliance with these requirements would reduce the potential risk to both people and structures with respect to a variety of geotechnical constraints. Therefore, impacts associated with unstable geologic units/soils would be less than significant and no mitigation is required.

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

Less Than Significant Impact. Table 18-1-B of the Uniform Building Code (UBC) provides guidelines for determining the seismic design category of buildings based on their occupancy and site conditions. As stated previously, the soil at the Project site consists of Tohay fine sandy loam, 0-2 percent slopes. Based on the type of soils at the project site, expansive soils are not anticipated at the Project site, therefore, impacts would be less than significant and no mitigation is required.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. The proposed Project would connect directly to the municipal sewer system and would not require septic tanks or any other alternative wastewater disposal system. Therefore, no impacts associated with the adequacy of soils and septic systems would occur and no mitigation is required.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant with Mitigation Incorporated. The proposed Project is located in an area of designated as "alluvium, lake, playa, and terrace deposits, unconsolidated and semi consolidated" (CDOC, 2010). This area is underlain by Pleistocene and older sedimentary rocks, giving it high paleontological potential. The Project area has the potential for containing unique paleontological resources and requires mitigation to less the overall impact. With the implementation of **Mitigation Measure GEO-1**, impacts will be reduced to below the level of significance. Therefore, impacts are considered less than significant impact with mitigation incorporated.

Mitigation Measure

MM GEO-1: Paleontological Resources

Should paleontological resources be identified on the Project site during any ground disturbing activities related to the Project, ground disturbing activities within 100 feet of the discovery shall cease and the Lodi Unified School District shall be notified within 24 hours of the discovery. The Project applicant shall retain a qualified paleontologist to provide an evaluation of the find and to prescribe mitigation measures to reduce impacts to a less than significant level. In considering any suggested mitigation proposed by the consulting paleontologist, the Project applicant shall determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, Project design, costs, specific plan policies and land use assumptions, and other considerations. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery) shall be instituted. Work may proceed on other parts of the Project site while mitigation for paleontological resources is carried out.

3.8 Greenhouse Gas Emissions

Issues	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS - Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

MD Acoustics in preparation of the Air Quality, Greenhouse Gas and Energy Impact Study (Appendix A) utilized information from the CalEEMod 2022.1.1.36 Output to complete this analysis. The CalEEMod outputs detail project related construction equipment, transportation energy demands, and facility energy demands.

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

Less Than Significant Impact.

Construction

During construction, the Project will use electricity and fossil fuels for activities such as site preparation, grading, building construction, paving, and painting. Energy use for these tasks will end once construction is complete. All equipment used during construction will comply with California Air Resources Board (CARB) regulations and state emission standards, ensuring expected fuel efficiency. In addition, CARB’s Airborne Toxic Control Measure limits idling of construction vehicles to five minutes, reducing unnecessary fuel consumption. The Project is designed to meet California Energy Efficiency Standards and the 2022 California Green Building Standards Code (CALGreen) requirements. Overall, the Project will use typical energy resources, and no unusual characteristics or processes will require equipment that is more energy-intensive than standard practices or that fails to meet current emission and fuel efficiency standards.

Operation

Once operational, the Project’s energy use will come from transportation and facility demands. Transportation energy demand will result from employee and school associated vehicles accessing the site. Typically, the largest source of operational energy use is from vehicle operation of customers, but the Project is allowing a closer elementary school for families to utilize. No additional vehicle trips will be generated by the Project and will therefore have no additional transportation fuel consumption. Facility energy demand will result from energy consumption from building operations and site maintenance activities. The estimated increase in both electricity demand from the proposed Project is insignificant compared to the demand of the non-residential sector of City of Lodi.

Therefore, the Project will not result in a significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation and no mitigation is required.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. The City of Lodi adopted the Climate Action Plan (CAP) on November 14, 2014 to align with AB 32 and the States efforts to reduce GHG emissions to 1990 levels by 2020. However, since adoption of the CAP in 2014, the State has enacted several significant GHG reduction measures, including AB 1279. AB 1279 sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels by 2045. Therefore, implementation of the project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions, and impacts would be less than significant and no mitigation is required.

3.9 Hazards and Hazardous Materials

Issues	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. 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 § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<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 result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. A variety of hazardous substances and wastes would be transported to, stored, used, and generated on the Project site during construction. These would include fuels for machinery and vehicles, new and used motor oils, cleaning solvents, paints, and storage containers and applicators containing such materials. Accidental spills, leaks, fires, explosions, or pressure

releases involving hazardous materials represent a potential threat to human health and the environment if not properly treated. However, these materials would be transported, used, and disposed of in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. For example, hazardous materials would not be disposed of or released onto the ground or into the underlying groundwater or any surface water during construction or operation of the Project, and completely enclosed containment would be required for all refuse generated on the Project site.

Additionally, all construction waste, including trash, litter, garbage, solid waste, petroleum products, and any other potentially hazardous materials, would be removed to a waste facility permitted to treat, store, or dispose of such materials. Use of these materials during construction for their intended purpose would not pose a significant risk to the public or the environment.

The transport and use of hazardous materials would be required to comply with the guidelines set forth by each product's manufacturer, as well as in accordance with all applicable federal, state, and local regulations. The U.S. Department of Transportation, the California Department of Health Services, California Department of Transportation (Caltrans), and the California Highway Patrol all have interrelated programs designed to prevent disasters during the transportation of hazardous materials. Additionally, the EPA and Occupational Safety and Health Administration have interrelated programs designed to prevent the misuse of hazardous materials in the workplace. Based on this information, and available and applicable rules, regulations, and guidance, impacts associated with construction would not result in hazards due to routine transport of hazardous materials. Impacts would be less than significant and no mitigation required.

Potentially hazardous materials associated with Project operations would include those materials used during typical cleaning and maintenance activities. Although these potential hazardous materials would vary, they would generally include household cleaning products, paints, fertilizers, and herbicides and pesticides. Many of these materials are considered household hazardous wastes, common wastes, and/or universal wastes by the EPA, which considers these types of wastes to be common to businesses and households and to pose a lower risk to people and the environment than other hazardous wastes when properly handled, transported, used, and disposed of. Federal, state, and local regulations typically allow these types of wastes to be handled and disposed of with less stringent standards than other hazardous wastes, and many of these wastes do not have to be managed as hazardous waste. Additionally, any potentially hazardous material handled on the Project site would be limited in both quantity and concentrations, consistent with other similar institutional uses located in the City, and any handling, transport, use, and disposal would comply with applicable federal, state, and local agencies and regulations. As mandated by the Occupational Safety and Health Administration, all hazardous materials stored on the Project site would be accompanied by a Safety Data Sheet, which would inform employees and first responders as to the necessary remediation procedures in the case of accidental release. Adherence to applicable federal, state, and local regulations, operation of the Project would not result in hazards due to routine transport of hazardous materials. Therefore, impacts would be less than significant and no mitigation required.

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?

Less Than Significant Impact. As previously discussed construction activities on the Project site would involve the transport of gasoline and other materials to the site during construction. Relatively small amounts of commonly used hazardous substances, such as gasoline, diesel fuel, lubricating oil,

grease, and solvents, would be used on site for construction and maintenance. The materials alone and use of these materials for their intended purpose would not pose a significant risk to the public or environment; however, accidental spills of hazardous materials during construction could potentially result in soil contamination or water quality impacts. To minimize or eliminate fuel spillage, all construction vehicles would be adequately maintained and equipped. All equipment maintenance work, including refueling, will occur off site.

All potentially hazardous construction waste, including trash, litter, garbage, other solid wastes, petroleum products, and other potentially hazardous materials, would be removed to a hazardous waste facility permitted to treat, store, or dispose of such materials. With implementation of federal, state, and local regulations, impacts associated with foreseeable upset and accident conditions would be less than significant and no mitigation is required.

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

Less Than Significant Impact. Limited amounts of hazardous materials would be used during construction and operation of the Project, including the use of standard construction materials (e.g., lubricants, solvents and paints), cleaning and other maintenance products (used in the maintenance of buildings, pumps, pipes and equipment), and potentially a limited application of pesticides associated with landscaping. These materials would be transported and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. None of these activities would result in the routine transport of, emission, or disposal of hazardous materials, and no acutely hazardous materials would be used on site during construction or operation of the proposed Project. All construction activity would be performed in compliance with City and County of San Joaquin regulations, and compliance with these regulations would ensure that the general public would not be exposed to any unusual or excessive risks related to hazardous materials during construction activities on the Project site. Adherence to federal, state, and local rules and requirements, impacts would be less than significant and no mitigation is required.

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

Less Than Significant Impact. The Project site (APN: 027-40-016) is located in western Lodi which is transitioning from agricultural and undeveloped land to suburban development with limited commercial areas. The Project is not included on the list of hazardous materials pursuant to Government Code § 65962.5. Additionally, a Phase I Environmental Site Assessment was completed by Terracon, Inc., dated October 17, 2025. Terracon engaged the services of Environmental Data Resources, Inc. to provide a list of the recorded sites within the Project area that have been identified by regulatory agencies of significance. The Phase I was performed in accordance with ASTM E1527-21, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.

According to the Phase I Environmental Site Assessment (ESA) (Terracon, 2025) Aperio Inc., in 2008, conducted a Preliminary Environmental Assessment for the Project site on behalf of the LUSD. At the time the site consisted of fallow agricultural land historically used for agricultural purposes (vineyard) with no record of structural development. A previous Phase I ESA (August 2007) identified a recognized environmental condition (REC) related to historical pesticide and herbicide use. Subsequent Phase II and PEA investigations included the collection of nine soil samples from locations gridded throughout the site on approximate one-acre centers, generally

from depths of 0-1 and 1-2 feet below ground surface (bgs), for analysis of organochlorine pesticides (OCPs), CAM 17 metals, and arsenic.

All OCP results were reported as non-detect, and detected metal concentrations, including arsenic and molybdenum, were below the applicable California Human Health Screening Levels in use at the time of assessment. When compared to the current Department of Toxic Substances Control (DTSC) Human Health Risk Assessment Note 3, April 2025 residential screening levels, the previously reported metal concentrations remain below applicable risk-based thresholds. Specifically, arsenic concentrations (reported up to 1.6 mg/kg) are within the range of regional background concentrations and below the current residential screening level of 0.07 mg/kg. Detected molybdenum concentrations were also significantly lower than the current residential screening level of 380 mg/kg.

Based on these findings, Aperio concluded that no evidence of significant contamination was present and recommended No Further Action, with subsequent DTSC approval of the site for school use. Therefore, there is a less than significant impact for this issue area and no mitigation is required.

Railroad Tracks

Based on review of Google Earth, the proposed Project site is located approximately 2.75 miles east of one set of railroad tracks, and approximately miles 2.0 miles west of another set of railroad tracks. Therefore, there is no impact to the site from railroad tracks.

Pipelines

According to the National Pipeline Mapping System – Public Map Viewer there are no hazardous pipelines within 1,500 feet of the Project site (NPMS, 2025). The construction contractor is still responsible calling 811 prior to digging or excavation in order to assure no smaller pipelines that may be within the Project site are damaged. This is a less than significant impact from gas transmission pipelines or hazardous materials pipelines.

High Voltage Transmission Lines

According to the US Electric Power Transmission Lines Interactive Map (Mapscaping, September 2025), the closest high voltage transmission line is located approximately 2.33 miles southeast of the Project site near the intersection of Highway 12 and Highway 99. There are lower voltage distribution lines near the Project site that deliver electricity to homes and businesses. There is a less than significant impact from high voltage transmission lines.

Asbestos

Asbestos is a generic term for the naturally occurring fibrous (asbestiform) variety of any of several minerals (crocidolite, tremolite, actinolite, anthophyllite, amosite and chrysotile) which separate into long flexible fibers and occur naturally in ultramafic rock formations. These igneous ultramafic rocks (pyroxenite, peridotite, dunite, and hornblendite) form below the earth's surface at very high temperatures and are exposed by uplift and erosion. During high-pressure processes involving tectonic deformation and burial, they may be altered to the metamorphic rock serpentinite. Chrysotile, the most common asbestos mineral in California, forms fibrous crystals in small veins in serpentinite rock. According to the California Department of Conservation, Division of Mines and Geology Open File Report 2011-1188, Reported Historic Asbestos Mines, Historic Asbestos Prospects, and Other Natural Occurrences of Asbestos in California, the subject property is not located in an area more likely to contain naturally occurring asbestos. Based on this information and given the

geological conditions in the site area, the issue of naturally occurring asbestos from rock/soil is not expected to be a concern at the site. This is considered a less than significant impact.

Radon Potential

Radon is a gas that is produced by the decay of uranium and radium. This naturally occurring, colorless, odorless, and tasteless gas is produced in most soil or rock. Consequently, all buildings have some radon, as well as the outdoor air. Radon can move with ease through any porous material through which a gas can move. Void spaces and pores are found in the soil underlying any building. Radon is a known carcinogen which the Surgeon General has warned is the second leading cause of lung cancer in the United States.

The National Radon Database has been developed by the United States Environmental Protection Agency and is a compilation of the EPA/State Residential Radon Survey and the National Residential Radon Survey. The study covers the years of 1986 through 1992. According to EPA publication 402-R-93-025, titled EPA's Map of Radon Zones, California, dated September 1993, San Joaquin County is reportedly in Zone 3. Zone 3 has a predicted average radon screening level of less than 2 picocuries per liter (pCi/l). This is considered to be the lowest value of geologic radon potential. Therefore, the impact to the site from radon is considered 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 or excessive noise for people residing or working in the project area?

No Impact. The California Department of Education requires, per Education Code Section 17215, that all airport runways and helipads (public or private) located within two miles of a proposed school site be identified. However, the Education Code pertains to the proposed acquisition or lease of a site per Section 17215(f).

The closest airport to the Project site is the Lodi Airpark, which is located approximately 2.6 miles south of the Project site. The distance to the next two airports; Kingdon Airport (private) is approximately 3.3 miles southwest, and Lodi Airport is approximately 5.7 miles north. According to the San Joaquin County's Aviation System – Airport Land Use Compatibility Plan (2018), the project site is located outside of any Airports' influence area boundary. Thus, air traffic noise associated with the airports would not expose construction workers, operational staff, students, or visitors to excessive noise levels. Therefore, no impacts associated with air traffic noise would occur and no mitigation is required.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. Both Vine Street and Westgate Drive provide egress from the Project site. Vine Street is oriented east-west and would provide access to the east approximately one block to South Lower Sacramento Road. South Lower Sacramento Road is four lane divided highway-oriented north-south. This would allow access to the safe direction. Westgate Drive is oriented north-south, and would provide south to Vine Street, or north to West Lodi Avenue. From West Lodi Avenue, it's approximately one block to South Lower Sacramento Road. As from Vine Street, there is access either north or south, whichever is the necessary direction to safety. Additionally, once the school is in operation, it would not result in any actions that would significantly impair or physically interfere with an adopted emergency response plan or

emergency evacuation plan. Therefore, impacts associated with adopted emergency response plans or emergency evacuation plans would be less than significant and no mitigation is required.

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

Less Than Significant Impact. The Project is located in a developing area of western Lodi. According to the Office of the State Fire Marshall Fire Hazard Severity Zone mapping the Project site and surrounding areas are designated as Local Responsibility Areas. This designation puts the responsibility for local fire fighting with the City of Lodi Fire Department. The City of Lodi has four fire stations available for fire response, as discussed later in this document. The Project will not expose people or structures to a significant risk of loss, injury or death involving wild land fires. Therefore, a less than significant impact is expected and no mitigation is required.

3.10 Hydrology and Water Quality

Issues	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY - Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 or through the addition of impervious surfaces, in a manner which would: i) result in a substantial erosion or siltation on- or off-site; ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. Construction of the Project would include earthwork activities that could potentially result in erosion and sedimentation, which could subsequently degrade downstream receiving waters and violate water quality standards. Stormwater runoff during the

construction phase may contain silt and debris, resulting in a short-term increase in the sediment load of the municipal storm drain system.

Substances such as oils, fuels, paints, and solvents may be inadvertently spilled on the Project site and subsequently conveyed via stormwater to nearby drainages, watersheds, and groundwater.

Because the Project would result in more than 1 acre of ground disturbance, the Project would be subject to the National Pollutant Discharge Elimination System stormwater program, which includes obtaining coverage under the State Water Resources Control Board's Construction General Permit. Construction activities subject to the Construction General Permit include clearing, grading, and disturbances to the ground such as stockpiling or excavation. The Construction General Permit requires development and implementation of a stormwater pollution prevention plan (SWPPP). Among the required items that must be included within a SWPPP are Project design features, commonly known as BMPs, intended to protect against substantial soil erosion as a result of water and wind erosion. The implementation of a Construction General Permit, including preparation of a SWPPP and implementation of BMPs, would reduce stormwater runoff during Project construction impacts to acceptable levels. It follows that because Project construction would not violate any water quality standards or waste discharge requirements, the Project would not otherwise substantially degrade surface or groundwater quality.

In addition to State requirements, the Project will be required to meet City of Lodi Stormwater Management and Discharge Control requirements (Code of Ordinances Chapter 13.14). These regulations contain requirements for both construction and post construction to reduce urban stormwater discharges to the maximum extent practicable. Therefore, there would be a less than significant impact for this issue area and no mitigation is required.

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

Less Than Significant Impact. The Project is undeveloped and consists of pervious surfaces. Thus, under the existing conditions, the Project site could be considered a location for limited groundwater recharge.

Although the Project would add impervious surfaces to the Project site, once operational, the project site would contain landscaped areas and other pervious surfaces that would allow water to percolate into the subsurface soils. Additionally, the Project would incorporate structural and treatment control BMPs to ensure that the Project would not adversely affect water quality.

During construction, the Project would use only limited amounts of water resources for construction activities and landscaping activities. Minimal water use will be required for any of the additional office space or classroom facilities. As such, impacts associated with groundwater recharge would be less than significant.

The Project would not involve permanent pumping of groundwater; therefore, the Project would not substantially deplete groundwater supplies. Due to the incorporation of structural and treatment control BMPs, the proposed Project would not substantially interfere with groundwater recharge. Impacts would be less than significant and no mitigation is required.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) result in a substantial erosion or siltation on- or off-site;

Less Than Significant Impact. The Project site is approximately 12 acres of undeveloped relatively flat land. Since construction would impact more than one acre, the Project would need to comply with the State Water Resources Control Board National Pollutant Discharge Elimination System (NPDES) general permit for Storm Discharges Associated with Construction Activities (state permit) which requires construction projects greater than one acre to submit a Notice of Intent for coverage, and to prepare a SWPPP. The SWPPP would identify construction BMPs and permanent post-construction BMPs.

Compliance with the terms and conditions of the NPDES, development and implementation of the SWPPP, compliance with City stormwater regulations, compliance with discharge requirements and BMPs would result in a less than significant impact and no mitigation is required.

ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

Less Than Significant Impact. The Project site is approximately 12 acres of undeveloped relatively flat land. Thus, implementation of the Project would increase the amount of impervious area on site and alter existing drainage patterns. The Project would be required to conform to applicable federal, state, and local requirements, including the current Municipal Separate Storm Sewer System (MS4) Permit adopted by the Central Valley Regional Water Quality Control Board. Compliance with these requirements would ensure the new drainage system is designed with adequate capacity to capture stormwater flow to prevent flooding on-site or off-site.

As such, altering the on-site drainage pattern would be conducted in such a manner consistent with applicable standards related to collection and treatment of stormwater; therefore, impacts associated with altering the existing drainage pattern of the Project site would be less than significant and no mitigation required.

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

Less Than Significant Impact. Under existing conditions, the Project site is undeveloped. The Project site does not currently have detention basins or capture systems in place to control stormwater runoff. Although the Project would increase the amount of impervious surfaces on the Project site, the proposed drainage system would be designed to conform to applicable federal, state, and local requirements, including the current MS4 Permit adopted by the Central Valley RWQCB. Compliance with these requirements would ensure the new drainage system is designed to have adequate capacity to capture stormwater flow to prevent the conveyance of sediment, debris, and other constituents potentially contained in on-site stormwater from leaving the Project site and impacting off-site and downstream receiving waters; therefore, impacts associated with water quality standards and runoff waters would be less than significant and no mitigation required.

iv) impede or redirect flood flows?

Less Than Significant Impact. According to the Federal Emergency Management Agency (FEMA) flood maps, the Project site is located within the 0.2% Annual Chance Flood Hazard Zone (500-year floodplain) (FIRM 06077CA306F, 10/16/2009). The City of Lodi Municipal Code addresses Flood Damage Prevention in Chapter 15.60 (LMC, 2025). The focus of this code is on development within the 200-year floodplain but does not have specific requirements for the development within the 500-year floodplain. The design and construction of the Project have safety as a priority but there is no permanent housing proposed as part of the Project. Therefore, although the Project is within the 500-year floodplain, it would not conflict with the Lodi Municipal Code, and have a less than significant impact with no mitigation required.

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

Less Than Significant Impact. According to the FEMA Flood Insurance Map, number 06077CO306F, dated 10/16/2009, the Project site is not located within a special flood hazard area that could be inundated by a 100-year flood, however, it is located in a flood hazard zone that could be inundated by a 500-year flood (0.2% chance) (FEMA, 2009). The City of Lodi General Plan confirms the FEMA mapping within the Safety Element (Lodi, 2024). Since the Project site is located outside of the 100-year flood zone, there is a less than significant impact and no mitigation is required.

Additionally, the Project site is located approximately 70 miles east of the Pacific Ocean and is generally 10 miles from the Delta and therefore there is no impact to the Project from a tsunami or a seiche and no mitigation is required.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. The Project would comply with regional, state, and local regulations requiring preparation of a SWPPP and would not obstruct existing water quality control plans or groundwater sustainable management plans. Although the Project would add impervious surfaces to the Project site, once operational, the Project site would contain landscaped areas and other pervious surfaces that would allow water to percolate into the subsurface soils. Additionally, the Project would incorporate structural and treatment control BMP's to ensure that the Project would not adversely affect water quality. Therefore, impacts associated with conflict with a water quality control plan or sustainable groundwater management plan would be less than significant and no mitigation required.

3.11 Land Use and Planning

Issues	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING - Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Physically divide an established community?

No Impact. The physical division of an established community typically refers to the construction of a linear feature (e.g. a major highway or railroad tracks) or removal of a means for access (e.g. a local road or bridge) that would impair mobility within an existing community or between a community or outlying area.

The Project site is currently vacant land and is identified in the City of Lodi 2025 Focused General Plan Update as a new elementary school. The need for the new elementary school was identified by the LUSD to serve the developing area of western Lodi. As such, implementation of the Project would not divide an established community and is not expected to result in additional physical barriers between nearby land uses. No impact would occur and no mitigation is required.

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

No Impact. The Project parcel currently has a planning designation of Planned Development (PD). The purpose of the Planned Development overlay zoning district is to “identify areas where the city has determined that flexibility in the application of development standards will produce development projects of superior quality, including retention of unique site characteristics, creative and efficient project design, etc., than would have been achieved through strict application of the development standards required by the primary zoning district” (Lodi Development Code, Section 17.28.040).

Overall, the proposed Project does not violate any policies within the City’s General Plan, Municipal Code, or any applicable specific plans in the area. Therefore, the proposed Project would not conflict with any applicable land use plan, policy, or regulation and would not represent a significant impact to the physical environment. No impact would occur and no mitigation is required.

3.12 Mineral Resources

Issues	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES - Would the project:				
a) Result in the loss of availability of a known mineral resource that would be a 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, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

No Impact. The State Mining and Reclamation Act (SMARA) of 1975 (California Public Resources Code Section 2710 et seq.) requires that the California State Geologist implement a mineral land classification system to identify and protect mineral resources of regional or statewide significance in areas where urban expansion or other irreversible land uses may occur, thereby potentially restricting or preventing future mineral extraction on such lands.

As mandated by SMARA, aggregate mineral resources within the state are classified by the State Mining and Geology Board through application of the Mineral Resource Zone (MRZ) system. The MRZ system is used to map mineral commodities within identified jurisdictional boundaries, with priority given to areas where future mineral resource extraction may be prevented or restricted by land use compatibility issues, or where mineral resources may be mined during the 50-year period following their classification. The MRZ system classifies lands that contain mineral deposits and identifies the presence or absence of substantial sand and gravel deposits and crushed rock source areas (i.e., commodities used as, or in the production of, construction materials). The State Geologist classifies MRZs within a region based on the following factors (DOC 2000):

- MRZ-1: Areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.
- MRZ-2: Areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence.
- MRZ-2a: Areas underlain by mineral deposits where geologic data show that significant measured or indicated resources are present.
- MRZ-2b: Areas underlain by mineral deposits where geologic information indicates that significant inferred resources are present.
- MRZ-3: Areas containing mineral deposits for which the significance cannot be determined from available data.

- MRZ-3a: Areas containing known mineral deposits that may qualify as mineral resource.
- MRZ-3b: Areas containing inferred mineral deposits that may qualify as mineral resources.
- MRZ-4: Areas where available information is inadequate for assignment of any other MRZ category.

According to the California Geologic Survey – Department of Conservation, the Project site is classified as MRZ-1, no significant mineral resources are present (DOC, 2025). Therefore, the proposed Project would not result in a loss of availability of a known mineral resource that would be of future value to the City of Lodi, the County of San Joaquin, or the residents of the state. No impact would occur.

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

No Impact. As previously discussed, the proposed Project would not result in the loss of availability of a locally important mineral resource recovery site delineated in a local general plan, specific plan, or other land use plan. No impact would occur and no mitigation is required.

3.13 Noise

Issues	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE - Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in 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) Generation of excessive ground borne vibration or ground borne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Noise is defined as unwanted sound. Sound may be described in terms of level or amplitude (measured in decibels [dB]), frequency or pitch (measured in hertz [Hz] or cycles per second), and duration (measured in seconds or minutes). The standard unit of measurement of the amplitude of sound is the decibel. Because the human ear is not equally sensitive to sound at all frequencies, a special frequency-dependent rating scale is used to relate noise to human sensitivity. The A-weighted decibel scale (dBA) performs this compensation by discriminating against low and very high frequencies in a manner approximating the sensitivity of the human ear. Several descriptors of noise (noise metrics) exist to help predict average community reactions to the adverse effects of environmental noise, including traffic-generated noise, on a community. These descriptors include the equivalent noise level over a given period (Leq), the statistical sound level (Ln), the day-night average noise level (Ldn), and the community noise equivalent level (CNEL). Each of these descriptors uses units of dBA. Table 3.13-1 provides examples of A-weighted noise levels from common sounds. In general, human sound perception is such that a change in sound level of 3 dB is barely noticeable; a change of 5 dB is clearly noticeable; and a change of 10 dB is perceived as doubling or halving of the sound level.

Table 3.13-1. Typical Sound Levels in the Environment and Industry

Common Outdoor Activity	Noise Level (dBA)	Common Indoor Activity
	110	Rock band
Jet flying at 300 meters (1,000 feet) overhead		
	100	
Gas lawnmower at 1 meter (3 feet)		
	90	
Diesel truck at 15 meters (50 feet), at 80 kilometers per hour (50 mph)		Food blender at 1 meter (3 feet)
	80	Garbage disposal at 1 meter (3 feet)
Noisy urban area, daytime		
Gas lawnmower at 30 meters (100 feet)	70	Vacuum cleaner at 3 meters (10 feet)
Commercial area		Normal speech at 1 meter (3 feet)
Heavy traffic at 90 meters (300 feet)	60	
		Large business office
Quiet urban daytime	50	Dishwasher in next room
Quiet urban nighttime	40	Theater, large conference room (background)
Quiet suburban nighttime		
	30	Library
Quiet rural nighttime		Bedroom at night, concert hall (background)
	20	
		Broadcast/recording studio
	10	
Lowest threshold of human hearing	0	Lowest threshold of human hearing

Source: Caltrans 2013

Leq is a sound energy level averaged over a specified period (typically no less than 15 minutes for environmental studies). Leq is a single numerical value that represents the amount of variable sound energy received by a receptor during a time interval. For example, a 1-hour Leq measurement would represent the average amount of energy contained in all the noise that occurred in that hour. Leq is an

effective noise descriptor because of its ability to assess the total time-varying effects of noise on sensitive receptors. Lmax is the greatest sound level measured during a designated time interval or event.

Unlike the Leq metrics, Ldn and CNEL metrics always represent 24-hour periods, usually on an annualized basis. Ldn and CNEL also differ from Leq because they apply a time-weighted factor designed to emphasize noise events that occur during the evening and nighttime hours (when speech and sleep disturbance is of more concern). "Time weighted" refers to the fact that Ldn and CNEL penalize noise that occurs during certain sensitive periods. In the case of CNEL, noise occurring during the daytime (7:00 a.m.–7:00 p.m.) receives no penalty. Noise during the evening (7:00 p.m.–10:00 p.m.) is penalized by adding 5 dB, while nighttime (10:00 p.m.–7:00 a.m.) noise is penalized by adding 10 dB. Ldn differs from CNEL in that the daytime period is defined as 7:00 a.m.–10:00 p.m., thus eliminating the evening period. Ldn and CNEL are the predominant criteria used to measure roadway noise affecting residential receptors. These two metrics generally differ from one another by no more than 0.5 dB to 1 dB; as such, they are often treated as equivalent.

Vibration

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Vibration can be a serious concern, causing buildings to shake and rumbling sounds to be heard. In contrast to noise, vibration is not a common environmental problem. It is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads. Some common sources of vibration are trains, buses on rough roads, and construction activities, such as blasting, pile driving, and heavy earthmoving equipment.

Several different methods are used to quantify vibration. Peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. PPV is most frequently used to describe vibration impacts to buildings and is usually measured in inches per second (in/sec). The root mean square amplitude is most frequently used to describe the effect of vibration on the human body and is defined as the average of the squared amplitude of the signal. Decibel notation is commonly used to measure root mean square. The decibel notation acts to compress the range of numbers required to describe vibration.

High levels of vibration may cause physical personal injury or damage to buildings. However, vibration levels rarely affect human health. Instead, most people consider vibration to be an annoyance that can affect concentration or disturb sleep. In addition, high levels of vibration can damage fragile buildings or interfere with equipment that is highly sensitive to vibration (e.g., electron microscopes). Most perceptible indoor vibration is caused by sources within buildings, such as operation of mechanical equipment, movement of people, or slamming of doors. Typical outdoor sources of perceptible vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If the roadway is smooth, the vibration from traffic is rarely perceptible.

Sensitive Receptors

Noise- and vibration-sensitive land uses are locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Residences, schools, hospitals, guest lodgings, libraries, and some passive recreation areas would be considered noise and vibration sensitive and may warrant unique measures for protection from intruding noise. Sensitive receptors near the Project site include residential uses to the west, and north, the Grace Point Church and John Elliot

Christian High School adjacent to the east, and undeveloped land to the south. The construction activities may be as close as approximately 30 feet from buildings on the adjacent properties.

Existing Noise Conditions

Two (2) 24-hour noise measurements were taken by MD Acoustic field personnel to determine the existing noise levels (Appendix D). The results indicated that traffic noise from Westgate Drive was the primary source of noise impacting the Project site. Noise data indicates the ambient noise levels during operational hours (6 AM to 4 PM) ranged from 39 to 49 dBA Leq at the northeast locations and 48 to 57 dBA Leq at the southwest location. The 24-hour ambient noise level ranged from 50 to 53 dBA CNEL at the Project site. The field data and observations indicate that traffic on Westgate Drive is the dominant source of noise.

Regulatory Setting

City of Lodi Noise Regulations and City of Lodi General Plan

Applicable policies and acceptable noise limits governing environmental noise in the City of Lodi are set forth in the Noise Element. The City has specified acceptable noise limits for various land uses for both exterior and interior environments (Table 9-3 from the General Plan). These limits are presented below:

Land Use	Outdoor Activity Areas ¹ (CNEL)	Indoor Areas (CNEL)
Residential	60	45
Motels, Hotels		
Public/Semi-Public	65	45
Recreational	65	50
Commercial		
Industrial	70	65
1 for non-residential uses, where an outdoor activity area is not proposed, the standard does not apply		

Policies

Guiding policies and implementing policies from the Noise Element that would mitigate potential impacts on noise include the following.

Guiding Policies

- N-G1 Protect humans, the natural environment, and property from manmade hazards due to excessive noise exposure.
- N-G2 Protect sensitive uses, including schools, hospitals, and senior care facilities, from excessive noise.

Implementing Policies

- N-P1 Control and mitigate noise at the source where feasible, as opposed to at the receptor end.
- N-P2 Encourage the control of noise through site design, building design, landscaping, hours of operation, and other techniques for new development deemed to be noise generators.
- N-P3 Use the noise and land use compatibility matrix (General Plan Table 9-2) and allowable noise exposure levels (General Plan Table 9-3) as review criteria for all new land uses. Incorporate noise attenuation measures for all projects that have noise exposure levels of “conditionally acceptable” and higher. These may include:
- Façades constructed with substantial weight and insulation;
 - Sound-rated windows in habitable rooms;
 - Sound-rated doors in all exterior entries;
 - Active cancellation;
 - Acoustic baffling of vents for chimneys, fans and gable ends;
 - Ventilation system affording comfort under closed-window conditions; and
 - Double doors and heavy roofs with ceilings of two layers of gypsum board on resilient channels to meet the highest noise level reduction requirements.
- N-P4 Discourage noise sensitive uses such as residences, hospitals, schools, libraries, and rest homes from locating in areas with noise levels above 65db. Conversely, do not permit new uses likely to produce high levels of noise (above 65db) from locating in or adjacent to areas with existing or planned noise-sensitive uses.
- N-P5 Noise sensitive uses, such as residences, hospitals, schools, libraries, and rest homes, proposed in areas that have noise exposure levels of “conditionally acceptable” and higher must complete an acoustical study, prepared by a professional acoustic engineer. This study should specify the appropriate noise mitigation features to be included in the design and construction of these uses, to achieve interior noise levels consistent with General Plan data.
- N-P6 Where substantial traffic noise increases (to above 70db) are expected, such as on Lower Sacramento Road or Harney Lane, as shown on the accompanying graphic, require a minimum 12-foot setback for noise-sensitive land uses, such as residences, hospitals, schools, libraries, and rest homes.
- N-P7 Require developers of potentially noise-generating new developments to mitigate the noise impacts on adjacent properties as a condition of permit approval. This should be achieved through appropriate means, such as:
- Dampening or actively canceling noise sources;
 - Increasing setbacks for noise sources from adjacent dwellings;
 - Using soundproofing materials and double-glazed windows;

- Screening and controlling noise sources, such as parking and loading Chapter 9: Noise | 9-11 facilities, outdoor activities, and mechanical equipment;
 - Using open space, building orientation and design, landscaping and running water to mask sounds; and
 - Controlling hours of operation, including deliveries and trash pickup.
- N-P8 Update Noise Ordinance regulations to address allowed days and hours of construction, types of work, construction equipment (including noise and distance thresholds), notification of neighbors, and sound attenuation devices.
- N-P14 Reduce vibration impacts on noise-sensitive land uses (such as residences, hospitals, schools, libraries, and rest homes) adjacent to the railroad, SR-99, expressways, and near noise-generating industrial uses. This may be achieved through site planning, setbacks, and vibration-reduction construction methods such as insulation, soundproofing, staggered studs, double drywall layers, and double walls.

City of Lodi Municipal Code

Chapter 9.24 – Noise Regulation of the City’s Municipal Code outlines the City’s noise ordinance.

9.24.030 - Excessive, offensive or disturbing noise.

The following activities are declared to cause excessive, offensive or disturbing noise in violation of this section, but said enumeration shall not be deemed exclusive:

A. It is unlawful for any person to sound any horn or other signaling device on any vehicle except as an emergency or danger warning signal. This provision shall be inapplicable to the sounding of any horn, bell, whistle, siren or other audible warning device which is operated in compliance with Section 7064 of the California Public Utilities Code, or with any other state or federal provision governing railroad operations.

B. It is unlawful to play or operate any drum, radio, phonograph, loudspeaker, sound amplifier, stereo, television, or other similar sound system, whether mobile or from a fixed location upon the public streets, public right-of-way or in public parks in such a fashion that it is clearly audible at a distance of fifty feet. The city council finds and declares that any sound or noise audible at such distance endangers the public safety and welfare by interference with normal human capability for hearing nearby traffic movement and warning signals. This section shall be inapplicable to radio systems operated under or pursuant to Federal Communications Commission licenses in the regular course of business.

It is found and declared as a matter of legislative policy that the operation of the aforementioned equipment or instruments on the public streets and rights-of-way adjacent to public parks during the hours between ten p.m. and seven a.m. in such a manner as to be clearly audible at a distance of fifty feet or greater shall constitute prima facie evidence of a violation of this section.

C. It is unlawful for any person, firm or corporation to cause, permit, or generate any noise or sound as described herein between the hours of ten p.m. and seven a.m. which exceeds the ambient noise level at the property line of any residential property (or, if a condominium or apartment house within any adjoining apartment) as determined at the time of such reading by more than five decibels. This section shall be applicable whether such noise or sound is of a commercial or non-commercial nature.

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

Construction

Less Than Significant Impact. Construction noise and vibration levels are temporary phenomena, which can vary from hour to hour and day to day, depending on the equipment in use, the operations being performed, and the distance between the source and receptor.

Equipment that would be in operation during proposed construction would include, in part, excavators, concrete saws, compressors, welders, and paving equipment. Table 3.12-3 presents typical maximum noise levels for various pieces of construction equipment at a distance of 50 feet (note that these are maximum noise levels). Typically, construction equipment operates in alternating cycles of full power and low power, producing average noise levels less than the maximum noise level presented in Table 3.13-2. The average sound level of construction activity also depends on the amount of time that the equipment operates and the intensity of construction activities during that time. Construction noise in a well-defined area typically attenuates at approximately 6 dB per doubling of distance.

Table 3.13-2. Typical Construction Equipment Noise Emission Levels

Equipment	Typical Sound Level (dBA) 50 Feet from Source
Air Compressor	81
Backhoe	80
Compactor	82
Concrete Mixer	85
Concrete Pump	82
Concrete Vibrator	76
Crane, mobile	83
Dozer	85
Generator	81
Grader	85
Impact Wrench	85
Jackhammer	88
Loader	85
Paver	89

Equipment	Typical Sound Level (dBA) 50 Feet from Source
Pneumatic Tool	85
Pump	78
Roller	74
Saw	76
Truck	88

Source: FTA 2018

Note: dBA = A-weighted decibels

Construction noise is considered a short-term impact and would be considered significant if construction activities are taken outside the allowable times as described in the City’s Municipal Code (Section 9.24.030(C)). Construction is anticipated to occur during the permissible hours (7 a.m. to 10 p.m.) according to the City’s Municipal Code. The City does not have a defined significance threshold for construction noise, however, the Federal Transit Administration (FTA) recommends a construction noise level threshold of 80 dBA Leq. MD Acoustics has applied the FTA threshold for construction noise to analyze the noise impact due to construction activities.

The closest sensitive land use to the Project is the church to the east of the site. The church property is an average of 320 feet away from construction activities (distance from the center of the Project site to the church property line) and as close as 20 feet from construction activities (distance from the edge of the project site to the church property line).

Construction equipment was taken from the project’s CalEEMod. Typical operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Noise levels are in Table 3.13-3. A likely worst-case construction noise scenario assumes equipment operating as close as 20 feet and an average of 320 feet from the property line of the nearest sensitive receptor, the church to the east. Leq levels represent the average construction noise level during each phase. The construction noise calculation output worksheet is located in Appendix C of the Noise Impact Study (Appendix D).

Table 3.13-3. Construction Noise Level by Phase (dBA, Leq)

Phase	dBA Leq
Site Preparation	71.6
Grading	69.8
Building Construction	70.8
Paving	60.9
Architectural Coating	57.9

As shown in Table 3.13-3 above, Project construction noise is expected to range between 58 to 72 dBA Leq at the nearest sensitive receptor. Thus, construction noise levels will be below the FTA 80 dBA Leq

threshold for construction noise. The project will be required to adhere to the allowed times for construction outlined in the Municipal Code in Section 9.24.030(C). The impact is less than significant, and no mitigation is required.

Operation

The operational noise assessment analyzes future noise impacts to sensitive receptors and to the Project and compares the results to the City's Noise Standards. The analysis details the estimated exterior noise levels associated with stationary noise sources and traffic from adjacent roadway sources.

Traffic noise along Westgate Drive is the main source of noise impacting the Project site and the surrounding area. Westgate Drive has an existing ADT of 2,270, per the City of Lodi Average Daily Traffic Volume Map. The Project projects 1,606 daily trips, per the CalEEMod. It takes a change of 3 dB or more to hear an audible difference, which would occur with a doubling of traffic. The Project will increase the existing traffic noise by up to 2 dB, therefore, the impact is less than significant and no mitigation is required.

The Noise Impact Analysis (Appendix D) estimates the operational noise levels are expected to be 50 to 59 dBA CNEL at adjacent residential receptors and will fall within the City's normally acceptable range of 60 dBA CNEL for residential uses. The operational noise level at the school and church receptors is expected to be 45 to 50 dBA CNEL and falls within the normally acceptable range for church and school land uses of 65 dBA CNEL. Existing plus project noise level projections are anticipated to be 53 to 60 dBA CNEL at the surrounding receptors. Project-generated operational noise is not expected to increase the existing ambient noise level at the nearby receptors. Thus, the impact is less than significant and no mitigation is required.

b) Generation of excessive ground borne vibration or ground borne noise levels?

Less Than Significant Impact. Construction activities have the potential to expose persons to excessive ground borne vibration or ground borne noise. Caltrans has collected ground borne vibration information related to construction activities indicating that continuous vibrations with a PPV of approximately 0.1 in/sec begin to annoy people (Caltrans 2020). The heavier pieces of construction equipment, such as excavators, would have PPVs of approximately 0.089 in/sec or less at a distance of 25 feet (FTA 2018).

The major concern with regard to construction vibration is related to building damage. Construction vibration as a result of the proposed Project would not result in structural building damage, which typically occurs at vibration levels of 0.5 in/sec or greater for buildings of reinforced-concrete, steel, or timber construction. The heavier pieces of construction equipment used would include typical construction equipment for this type of Project, such as backhoes, front-end loaders, and flatbed trucks. Pile driving, blasting, and other special construction techniques would not be used for construction of the proposed Project; therefore, excessive ground borne vibration and ground borne noise would not be generated. Vibration levels from Project construction would be less than the thresholds of annoyance and potential for structural damage. Operation of the proposed Project would not result in any sources of vibration. Therefore, impacts would be less than significant and no mitigation required.

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

No Impact. The closest airport to the Project site is the Lodi Airpark, which is located approximately 2.6 miles south of the project site. The distance to the next two airports; Kingdon Airport (private) is approximately 3.3 miles southwest, and Lodi Airport is approximately 5.7 miles north. According to the San Joaquin County's Aviation System – Airport Land Use Compatibility Plan (2018), the Project site is located outside of any Airports influence area boundary. Thus, air traffic noise associated with the airports would not expose construction workers, operational staff, students, or visitors to excessive noise levels. Therefore, no impacts associated with air traffic noise would occur.

3.14 Population and Housing

Issues	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. POPULATION AND HOUSING - Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Less Than Significant Impact. The proposed Project would not directly induce substantial population growth in the area, because no residential units are proposed as part of the Project. However, the proposed Project would require a temporary construction workforce to construct the school facilities. The number of construction workers needed during any given period would largely depend on the specific stage of construction but would likely average a few dozen workers at any given time throughout the workday. These short-term positions are anticipated to be filled primarily by workers who reside in the Project site vicinity; therefore, construction of the proposed Project would not generate a permanent increase in population in the Project area.

Upon completion, the proposed Project would consist of a new elementary school. The District, as the lead agency, has acknowledged the need for a permanent elementary school to meet the needs of the Lodi community. Additionally, the operation of the proposed Project may require an increase in staff. However, the increase would be minimal and would not induce population growth.

Further, the proposed Project would generally connect to existing utilities and infrastructure located adjacent to the Project site. The proposed Project would not construct new or extend existing utilities or infrastructure into areas not currently served by such improvements. Thus, the proposed Project would not indirectly induce population growth, and impacts associated with population growth inducement would be less than significant and no mitigation is required.

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

No Impact. The proposed Project consists of the construction of the elementary school to serve the needs of the western Lodi community. The proposed Project would not displace existing housing or people and would not necessitate the construction of replacement housing elsewhere. Therefore, no impact would occur and no mitigation is required.

3.15 Public Services

Issues	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XV. PUBLIC SERVICES - Would the project:

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

Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Fire protection?

Less Than Significant Impact. The Project is the construction and operation of a new elementary school in the western area of the City of Lodi. The need for this elementary school was identified within development plans for western Lodi. The Lodi Area Fire Department responds to City development plans with the preparation of the Five-Year Strategic Plan that outlines short, medium, and long-term organizational goals and identify the objectives that will be required to meet these targets (City of Lodi, 2020).

Currently, Lodi Fire Station No. 4 is the closest station to the Project being located at 180 North Lower Sacramento Road, approximately 1.25 miles north. Although the proposed Project may require fire protection and/or paramedic services in the event of an emergency, the proposed Project is not expected to result in the need for new or physically altered fire facilities or result in the stations' inability to maintain acceptable service ratios, response times, or other performance objectives. The increase in demand for fire protection services due to the proposed Project would result in a less than significant impact and no mitigation required.

Police protection?

Less Than Significant Impact. The Project would be served by the City of Lodi police department, located at 315 West Elm Street, approximately 2.75 miles northeast of the Project site. According to the City of Lodi General Plan Safety Element, in 2020, the police department had 109 full-time

employees and 120 volunteers, with 77 sworn officers (City of Lodi, 2024). Additionally, the police divide the City into three districts, each consisting of five patrol beats. The Project would be located in Sunset District – Beat 3. The goal of this structure is to allow officers to assigned to specific districts to develop relationships with residents and effectively address crime-related issues through preventive measures (City of Lodi, 2025).

As discussed previously, the Project would not directly induce population growth in the area. Although occupants of the Project could require police services throughout the life of the Project, given the relatively low number of students and staff that would use the Project site and given that police services already serve the Project site, the Project is not anticipated to add a new strain on the existing police functions. The increase in demand for police protection services due to the Project would result in a less than significant impact and no mitigation required.

Schools?

No Impact. As previously discussed, implementation of the proposed Project would not increase the population within the area. The proposed Project would include the construction of the proposed elementary school. Operation of the proposed Project is not expected to result in a substantial increase in students beyond the planned capacity of this school. Therefore, the Project would not generate the need for additional school capacity. No impact would occur.

Parks?

Less Than Significant Impact. As previously discussed, implementation of the proposed Project would not increase the population within the area. The proposed Project would include the construction of the proposed elementary school to serve the needs of western Lodi. The proposed Project site is located across Westgate Street, and one block (0.5 miles) south of Westgate Park. Westgate Park has a playground area and a large open grass area with no restrooms or designated playing fields. The proposed Project is separate and distinct from Westgate Park and would not be significantly impacted by the proposed Project. Therefore, less than significant impacts would occur.

Other public facilities?

No Impact. As previously discussed, implementation of the proposed Project would not increase the population within the area. The proposed Project would include the construction of the proposed elementary school to support the residents of western Lodi. The proposed Project would not result in adverse impacts related to the provision of other public facilities, include emergency medical services or libraries. No impacts to other public facilities are anticipated.

3.16 Recreation

Issues	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. 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 checked="" type="checkbox"/>	<input type="checkbox"/>

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

No Impact. The proposed Project does not include any residential uses that may increase the utilization of existing neighborhood parks in the vicinity such that substantial physical deterioration of the facility or an increase in park facilities would occur or be accelerated. The proposed Project consists of the construction of a proposed elementary school to serve the residents of western Lodi. No impacts related to an increase in use of existing parks will occur and no mitigation is required.

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?*

Less Than Significant Impact. The proposed Project is the construction and operation of an elementary school. The school will be constructed with recreational opportunities on campus for use of students attending the school. There are outdoor basketball courts envisioned, and an indoor multi-purpose room proposed at the school. These facilities would be within the proposed school boundaries. Therefore, impacts relating to the proposed recreational facilities would be less than significant and no mitigation is required.

3.17 Transportation

Issues	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION – Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less Than Significant Impact. The proposed Project is the development of an elementary school on a mostly vacant lot in the western area of the City of Lodi. The proposed Project will develop the school with driveways to access parking lots on both Westgate Drive and Vine Street. Additional improvements will include sidewalks along both streets for safe pedestrian access to and from the school. The Vehicle Miles Travelled (VMT) analysis, discussed below, indicated that there would be a reduction in overall vehicle trips because the school would be located closer to the neighborhoods feeding the school. Therefore, overall, the Project would not significantly impact the circulation system and no mitigation is required.

b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

Less Than Significant Impact. CEQA Guidelines Section 15064.3(b) focuses on VMT for determining the significance of transportation impacts. It is further divided into four subdivisions: (1) land use projects, (2) transportation projects, (3) qualitative analysis, and (4) methodology. The updated CEQA Guidelines state that “generally, VMT is the most appropriate measure of transportation impacts,” and define VMT as “the amount and distance of automobile travel attributable to a project.” Automobile refers to on-road passenger vehicles, specifically cars and light trucks. The Governor’s Office of Planning and Research has clarified in its Technical Advisory (OPR 2018) that heavy-duty truck VMT is not required to be included in the estimation of a project’s VMT. Other relevant considerations may include the effects of a project on transit and non-motorized traveled.

The proposed Project would be categorized under CEQA Guidelines Section 15064.3(b)(1) as a land use project, for the purpose of VMT analysis. A project’s VMT analysis should follow the guidelines in the SJCOG Traffic Impact Analysis Guidelines, dated February 13, 2020, and provide the screening criteria and methodology for VMT analysis. Projects that pass at least one screening criteria are

generally expected to cause a less than significant impact without conducting a detailed VMT analysis. This is consistent with the Governor's Office of Planning and Research's Technical Advisory, which states that projects that meet the screening thresholds based on their location and project type may be presumed to result in a less than significant transportation impact (OPR 2018).

Project Type Screening for VMT Analysis

Local-serving projects may be presumed to have a less than significant impact absent substantial evidence to the contrary because they serve the local area's needs and have the effect of reducing vehicle travel. The proposed Project does not include any retail components; however, according to the SJCOG Traffic Impact Analysis Guidelines, local-serving projects that by definition would decrease the number of trips or the distance those trips travel to access the development (and are VMT-reducing projects) include the following:

- Local-serving K-12 schools
- Local parks
- Daycare centers
- Local-serving gas stations
- Local-serving banks
- Local-serving hotels (e.g., non-destination hotels)
- Student housing projects
- Local-serving community colleges that are consistent with the assumptions noted in the RTP/SCS

As shown above, local-serving K-12 schools are consistent with the assumptions noted in the 202-2045 RTP/SCS can be presumed to have a less than significant impact. Because the proposed Project is part of a local-serving elementary school and does not include a land use or zoning designation change, it is consistent with the RTP/SCS and therefore can be presumed to have a less than significant VMT impact.

Therefore, the proposed Project would not conflict with or be inconsistent with CEQA Guidelines Section 15064.3(b), and impacts would be less than significant and no mitigation is required.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. Vehicular access to the proposed school will be from two separate driveways. One driveway would have entry and exist on Vine Street, and another entry and exist from Westgate Street. The drop-off/pick-up areas are at the end of planned parking lots to allow for queuing of vehicles. During construction, there would be limited lane and sidewalk closures to allow for material deliveries. Therefore, the proposed Project would not increase hazards due to a geometric design feature or incompatible use and impacts would be less than significant and no mitigation is required.

d) Result in inadequate emergency access?

Less Than Significant Impact. Both Vine Street and Westgate Drive provide egress from the Project site. Vine Street is oriented east-west and would provide access to the east approximately one block to South Lower Sacramento Road. South Lower Sacramento Road is four lane divided highway-oriented north-south. This would allow access to the safe direction. Westgate Drive is oriented north-south, and would provide south to Vine Street, or north to West Lodi Avenue. From West Lodi Avenue, it's approximately one block to South Lower Sacramento Road. From Vine Street, there is access either north or south, whichever is the necessary direction to safety. Additionally, once the school is in operation, it would not result in any actions that would significantly impair or physically interfere with emergency access, an adopted emergency response plan or emergency evacuation plan. Therefore, impacts associated with adopted emergency response plans or emergency evacuation plans would be less than significant and no mitigation is required.

3.18 Tribal Cultural Resources

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

The proposed project is subject to compliance with Assembly Bill (AB) 52 (PRC 21074), which requires the consideration of impacts to Tribal Cultural Resources as part of the CEQA process. Under AB 52, the lead agency must notify California Native American tribes who are traditionally or culturally affiliated with the geographic area of the project that have requested notification.

The District sent notification letters to the California Native American Tribal representatives of the following Tribes listed by the Native American Heritage Commission (NAHC) who had requested notification pursuant to AB 52 on November 19, 2025, via U.S. Postal Service certified mail and email:

- Amah Mutsun Tribal Band
- Buena Vista Rancheria of Me-Wuk Indians
- Calaveras Band of Mi-Wuk Indians
- California Valley Miwok Tribe
- Chicken Ranch Rancheria of Me-Wuk Indians
- Confederated Villages of Lisjan Nation
- Ione Band of Miwuk Indians
- Jackson Rancheria Band of Miwuk Indians

- Nashville Enterprise Miwok-Maidu-Nishinam Tribe
- Northern Valley Yokut/Ohlone Tribe
- Pakan'yani Maidu of Strawberry Valley Rancheria
- Tule River Indian Tribe
- United Auburn Indian Community of the Auburn Rancheria
- Wilton Rancheria

The notification letters included the project location, a project description, explanation of AB 52 timing, an invitation to consult, and contact information for the appropriate lead agency representative. To date, the District has received three responses to the notification letters and emails. Table 3.18-1 summarizes the results of the AB 52 process for the project. The confidential AB 52 consultation results are on file with the District.

Table 3.18-1. AB 52 NAHC-Listed Native American Contacts

Native American Tribal Representatives	Response Received
Chicken Ranch Rancheria of Me-Wuk Indians	1. On November 20, 2025, the Chicken Ranch Rancheria of Me-Wuk Indians responded to the LUSD email and did not have comments.
Confederated Villages of Lisjan Nation	1. On November 19, 2025, the Confederated Villages of Lisjan Nation responded to the LUSD email and requested the results of the SLF and CHRIS records requests and any cultural resource reports conducted for the Project. 2. On February 4, 2026, LUSD emailed the Cultural Resources Desktop Review and SLF Request. 3. On February 5, 2026, the Confederated Villages of Lisjan Nation responded to the LUSD email and requested the inclusion of mitigation measures for inadvertent discoveries of Tribal Cultural Resources and human remains (included in MM CR-1 and CR-2).
United Auburn Indian Community of the Auburn Rancheria	1. On November 21, 2025, the United Auburn Indian Community of the Auburn Rancheria responded to the LUSD email and requested the inclusion of a Tribal Cultural Resource mitigation measure for unanticipated discoveries (included in MM CR-1). They stated they do not need to formally consult under AB 52.

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

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

Less Than Significant Impact. As discussed in Section 3.5, Cultural Resources, no historic built environment resources were identified within the Project site according to the California Historical Resources Information System records search. Therefore, the likelihood of encountering historic resources, including subsurface resources, is low.

Additionally, no tribal cultural resources (either listed or eligible for listing) were identified within the Project site based on the California Historical Resources Information System records search, the NAHC Sacred Lands File search, and Native American outreach efforts. Terracon requested a search of the NAHC Sacred Lands File (SLF) to determine the presence of any Native American cultural resources within the Project site. The SLF records search results were negative for known Native American heritage resources within the Project site.

In compliance with AB 52, the LUSD contacted NAHC-listed tribal representatives who requested Project notification. The NAHC identified 33 Native American individuals from tribes traditionally and culturally affiliated with the Project's geographic area; however, no tribal cultural resources were identified during consultation and no mitigation is required.

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

Less Than Significant Impact with Mitigation Incorporated. The Project site has been heavily disturbed with previous agricultural uses and has no record of listing in any register of historical resources. Nonetheless, the presence of remains or unanticipated cultural resources under the ground surface of the Project site. Implementation of **Mitigation Measures CR-1** and **CR-2** will ensure that impacts due to discovery of unanticipated cultural resources during excavation will be less than significant with mitigation incorporated.

Mitigation Measures

See **Mitigation Measures CR-1** and **CR-2** in Section 3.5.

3.19 Utilities and Service Systems

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

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

Less Than Significant Impact. The City of Lodi Public Works Department is responsible for operating and maintaining the city’s drinking water system, wastewater treatment plant, sanitary sewer and storm drain system. Lodi Electric supplies electricity to the City of Lodi, Pacific Gas & Electric (PG&E) supplies natural gas, and telecommunications is supplied by Xfinity, AT&T and NewEdge Networks. The connection of these utilities would be extended from their current locations for operation of the proposed buildings. Given that the activity of connecting utilities from their current locations would require ground disturbance and the use of heavy machinery associated with trenching, the connection of these utility services to the proposed building would potentially result in environmental effects. However, the extension of these utility lines is part of the proposed Project analyzed herein. As such, any potential environmental impacts related to these components of the

proposed Project are already accounted for this IS/MND as part of the impact assessment conducted for the entirety of proposed Project. No adverse physical impacts beyond those already disclosed in this IS/MND would occur as a result of implementation of the proposed Project's utility system connections. Additionally, the Project would constitute a nominal increase in utility usage, which has already been accounted for in growth projections for the City of Lodi and by each utility provider. No modification to utility infrastructure would be necessary outside of the Project site. As such, impacts associated with the construction or expansion or utility line connections would be less than significant and no mitigation required.

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

Less Than Significant Impact. The Project would be served by the City of Lodi which provides water to the Water Master Plan Service Area as identified in the 2012 Water Master Plan (City of Lodi, 2012). The City utilizes groundwater as the main source of water, and also has a 40-year agreement with the Woodbridge Irrigation District (WID) to purchase up to 6,000 acre-feet per year (AFY) of surface water from the Mokelumne River annually. This agreement also allows for a total of 42,000 acre feet of water to be banked for future use. The banked water is available to the City during wet years, and by averaging the use of banked water over the term of agreement, the average annual delivery of surface water to the City would be 7,200 acre feet per year.

The City's existing water distribution system is a 240-mile grid network of mains ranging from 2 inch to 36 inches in diameter, approximately 7,800 water valves and 1,800 fire hydrants, 23 four water storage tanks with a capacity of 5.1 million gallons (12.6 AF), and a total of 28 groundwater wells spaced at half-mile intervals throughout the City. The capacity of the wells ranges from 1.2 to 3.0 million gallons per day (mgd) and the total capacity of the 28 existing wells is approximately 55.5 mgd (170.4 AF per day). The surface water from the Mokelumne River is conveyed to the City's other distribution pipelines via a 36-inch diameter transmission pipeline beginning at the intersection of North Mills Avenue and West Turner Road, continuing south along North Mills Avenue until its intersection with Elm Street. The City built a new storage tank at Well 23 (Maggio Circle) that has been in operation since 2020. In addition, a storage tank at Well 28 (Kettleman Lane and Westgate Drive) is scheduled to be completed by 2025 (City of Lodi, 2025).

The City recognizes that the development of vacant land in the service area will affect the City's utility facilities. The City's levels of service standards for the water utility are as follows:

- Average daily demand for residential is 200 gallons per capita per day, commercial is 2,750 gallons per acre per day and industrial is 2,200 gallons per acre per day.
- The peaking factor per day is 2.24 and per hour is 3.28.
- The City's standard for minimum pressure is 20 pounds per square inch at the service point or fire hydrant under the worst case of either maximum daily demand plus fire flow or peak hour demand.
- All improvement, expansion, or increases in capacity to the facilities shall be compatible with the adopted level of service standards.

Threats to the City's water supply primarily consist of potential catastrophic events, such as earthquakes, major fire emergencies, water outages due to extended losses of power, localized flooding, surface water or groundwater contamination, and acts of sabotage, and climate change-related impacts including decreased precipitation, increased temperatures, and longer dry periods.

Emergency Response

To address the potential for the immediate, catastrophic interruption of water supplies, the City is in the process of developing an Emergency Response Plan (ERP). The ERP would include federal, state, and local contact directories, an emergency contractor directory, resource inventories, locations for emergency operations centers, response procedures, and the steps necessary to resume normal operations. The City also maintains a preventative maintenance program for its distribution system. Auxiliary generators are available the City makes frequent improvements to water facilities to minimize loss of these facilities during an earthquake or any disaster causing an electric power outage. The City's metering program also includes surveying and replacing of water mainlines, which both limits distribution system loss and better ensures the water system's reliability in the event of a catastrophic supply interruption. The City also continues to increase existing water storage through the construction of additional storage tanks, like the Southwest Gateway Water Tank.

Drought Risk

While the groundwater subbasin underlying the City is critically overdrafted, groundwater levels have been increasing in recent years indicating progress in implementing the Eastern San Joaquin Groundwater Sustainability Plan (ESJGSP). Lodi Water Utility (LWU) does not anticipate that overdrafting conditions will significantly impact its ability to extract groundwater in the short term. The City also anticipates that even in the most severe shortage conditions, its supply of surface water would only decrease by 50 percent (to 3,000 AFY). Therefore, the City expects to meet demands for the next five years under a five-year consecutive drought. With the majority of the City's groundwater safe yield and all recycled water still available, the City's water supplies would meet normal or near-normal demands. The Urban Water Management Plan's (UWMP) drought risk analysis also assumes that the City would implement demand reduction actions through its Water Shortage Contingency Plan to reduce supply stress.

Water Shortage Contingency Plan

As part of urban water management planning, water suppliers are required to provide a Water Shortage Contingency Plan (WSCP) that outlines how the supplier will prepare for and respond to a water supply shortage or catastrophic interruption. LWU's WSCP includes six stages and cover a possible reduction in supply of more than 50 percent. These are shown in Table 3.19-1. These six stages would be implemented depending on the severity and anticipated duration of the water supply shortage. Each stage has either voluntary or mandatory reductions.

Table 3.19-1. Stages of Water Shortage Contingency Plan

Stage	Percent Supply Reduction	Shortage Response Action
I	10%	<p>Stage I is implemented by a reduction in water supply up to 10%. All requirements of the City’s Water Conservation Ordinance are in effect for Stage I as during normal conditions. Also, as in normal conditions, the State’s Model Water Efficient Landscape Ordinance is in effect in the City, per the State’s mandate as of January 1, 2010. Lodi’s Water Conservation Program consists mainly of outdoor watering restrictions enforced by water conservation patrol staff, public education through local fairs and other events, bill inserts, and newspaper articles, and an in-school education program. During Stage I, public outreach from the Water Conservation Program remains the same.</p>
II	20%	<p>Stage II is implemented by a reduction in water supply between 10% to 20%. This makes all the voluntary demand reduction actions and wasteful water practices from Stage I mandatory. Additionally, dining establishments are not to serve water unless requested. Hotels and motels must offer guests the option of not having towels and linens laundered daily by displaying notices prominently in each guestroom.</p>
III	25%	<p>Stage III is implemented by a reduction in water supply between 20% to 30%. This includes the following additional mandatory reduction actions on top of the actions already required from Stage II:</p> <ul style="list-style-type: none"> • Landscape irrigation restrictions are implemented to limit the allowable frequency of irrigation to a maximum of two days per week based on the following schedule: 1. Premises having odd numbered street addresses irrigate only on Wednesday and Sunday. 2. Premises having even numbered street addresses irrigate only on Tuesday and Saturday. 3. No watering will be allowed by any addresses on Monday, Thursday, and Friday.
IV	30%	<p>Stage IV is implemented by a reduction in water supply between 30% and 40%. This includes the following additional mandatory reductions on top of the actions already required from Stage III:</p> <ul style="list-style-type: none"> • Landscape irrigation restrictions are implemented to limit the allowable frequency of irrigation to a maximum of one day per week and based on the following schedule: 1. Premises having odd numbered street addresses irrigate only on Sunday. 2. Premises having even numbered street addresses irrigate only on Saturday. • No potable water from the City’s system is used to fill or refill new swimming pools, artificial lakes, ponds, or streams until the water crisis is declared over. • Water use for ornamental ponds and fountains is prohibited. • Washing of automobiles and equipment must be done on the lawn or at a commercial establishment that uses recycled or reclaimed water. • Flushing of sewers or fire hydrants is permitted only in cases of emergency and essential operations. In addition to the penalties for waster wasting outlined in Lodi Municipal Code (LMC) Chapter 13.08, permanent water meters on existing non-metered services and/or flow restrictors on existing metered services would be installed by the City at the customer’s expense in the event of a second violation.

V	50%	<p>Stage V is implemented by a reduction in water supply between 40% and 50%. This includes the following additional mandatory reductions on top of the actions already required from Stage IV:</p> <ul style="list-style-type: none"> • Landscape irrigation is not allowed. • Washing of automobiles and equipment must be done at a commercial establishment that uses recycled or reclaimed water. • No potable water from the City’s system can be used for construction purposes, such as dust control, compaction, or trench jetting. • Large industrial users, for example canneries and other food manufacturers, are required to reduce all water use.
VI	>50%	<p>Stage VI is implemented by a reduction in water supply over 50%. This includes the following additional mandatory reductions on top of the actions already required from Stage V:</p> <ul style="list-style-type: none"> • Increased mandatory water use reduction. • Large industrial users are required to cease all water use. • Commercial kitchens are required to use pre-rinse spray valves.

Source: City of Lodi, 2021

The 2020 UWMP projects water demand in the LWU service area to increase to 18,365 afy by 2045. This projection is based on the assumption that the City’s population will grow to 90,008 residents by 2045. Under the conservative assumption that all land in the Sphere of Influence (SOI) is annexed into the service area of the LWU by 2045, the total water demand under buildout of the 2024 General Plan would be 11,339 afy (10.12 mgd), which is approximately 38 percent less than the water demand projected in 2020 UWMP by 2045. Buildout under the 2024 General Plan would therefore not exceed the City’s available water supplies under the most restrictive water use scenario, 15,000 afy of groundwater at the fifth dry year.

Should demand increase as projected within the 2020 UWMP, therefore outpacing the City’s water supply for most dry years, the LWU plans to expand the SWTP to accommodate 20 mgd of water treatment capacity. This would also accompany new water supply agreements to increase the City’s purchased surface water supply. Therefore, the proposed Project would not result in an increase in water demand that would exceed available water supplies during normal, dry, and multiple-dry years when compared to the approved Project. The proposed Project would not result in any new or increased impacts with respect to water supply, and impacts would remain less than significant and no mitigation required.

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

Less than Significant Impact. The City of Lodi Wastewater Utility operates within the City’s public works department and provides wastewater collection and treatment for the incorporated area of the City of Lodi. The Wastewater Utility operates the White Slough Water Pollution Control Facility (WPCF), approximately six miles west of the City, which treats the City’s wastewater to tertiary levels. The department also maintains the City’s wastewater pipelines and lift stations that convey wastewater to White Slough WPCF and the storm drain pipelines and lift stations that convey storm water to various points of discharge (City of Lodi 2023a).

Wastewater Collection

The City's wastewater system currently consists of about 195 miles of collection system pipelines ranging in sizes from 4 to 42 inches in diameter, with 6 inches being the predominant size. There are six wastewater trunk lines (Hutchins Street, Mills Avenue, Ham Lane, Lower Sacramento Road, Stockton Street/Washington Street, Beckman Road) serving the City that generally flow from the north to the south. The six trunk lines connect to the Century Boulevard Trunk Line that flows east to west, and into the 42-inch trunk sewer/outfall pipeline that conveys flows southwest to the City's WWTP (City of Lodi 2022). All wastewater flow are conveyed to this 42-inch outfall line which has an existing peak flow of 14.21 mgd and a 19.0 mgd capacity.

The Wastewater Master Plan anticipated that new trunk lines would be needed to serve new development in the western portions of the City and extended the trunk line from Lodi Avenue, south along Westgate Drive and connects into the existing outfall line. The new development in the western portion of the City was identified in the 2010 General Plan and the 2024 General Plan update.

Additionally, any new development would be subject to the California Green Building Standards for water conservation, which would result in progressively less indoor water consumption over the course of the 2024 General Plan buildout. This would result in less wastewater flows to the Wastewater Treatment Plant (WWTP) than anticipated in the current analysis. Therefore, the proposed Project would not result in new or increased impacts with respect to WWTP capacity when compared to the impacts identified in the 2009 Certified EIR. Therefore, impacts would remain less than significant and no mitigation required.

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

Less Than Significant Impact. The City of Lodi contracts with Waste Management to provide collection, transportation, and disposal of residential and commercial garbage as well as collection of recyclable materials. Garbage is collected weekly, and recyclable materials and yard and garden waste are collected on alternating weeks.

Residential and commercial solid waste is hauled to the North County Recycling Center and Sanitary Landfill (North County Landfill) at 17720 East Harney Lane, owned and operated by San Joaquin County. The North County Landfill is a Class III landfill; that is, one that only accepts non-hazardous solid waste. It has a permitted capacity of approximately 41,200,000 cubic yards and a maximum permitted throughput of 825 tons per day. As of the beginning of 2010, the North County Landfill had remaining capacity of 35,400,000 cubic yards, which at the maximum permitted throughput would allow the landfill to accept solid waste to the year 2048 (CalRecycle 2019).

Compliance with AB 939 is measured in part by comparing actual disposal rates for residents and employees to target rates; actual rates at or below target rates are consistent with AB 939. Target disposal rates for Lodi in 2022 were 8.7 pounds per day (ppd) per resident and 23.7 ppd per employee; actual disposal rates were 6.7 ppd per resident and 16.3 ppd per employee (CalRecycle 2022). Therefore, the solid waste diversion goals for the City have been met.

The General Plan requires that new development would be required to comply with State requirements to reduce the volume of solid waste through recycling and organic waste diversion. The City's per capita disposal rates of 6.7 ppd per resident and 16.3 ppd per employee are below the CalRecycle targets of 8.7 ppd for residents and 23.7 ppd for employees. In addition, potential future development pursuant to the 2024 General Plan would comply with Division 4.4, Material

Conservation and Resource Efficiency, of the CALGreen Code, which requires that at least 65 percent of nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse.

Potential future development would also comply with AB 341, which mandates recycling for commercial and multifamily residential land uses as well as schools and school districts. Jurisdictions in California are required to provide organic waste collection services to all residents and businesses, beginning in 2022 and in accordance with Senate Bill 1383. The City currently complies with all applicable federal, State, and local solid waste regulations, and solid waste, recycling, and green waste collection services are available to all residents and commercial businesses in Lodi.

The proposed Project is identified in the 2024 General Plan which would not result in new or more significant impacts from the previous General Plan. Therefore, implementation of the proposed Project would not generate solid waste in excess of State and local standards, or in excess of the capacity of the landfills, and would comply with applicable regulatory requirements. Impacts would be less than significant and no mitigation is required.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. The Project would be required to comply with all applicable federal, state and local agency regulations related to solid waste. Under AB 939, the Integrated Waste Management Act of 1989, local jurisdictions are required to develop source reduction, reuse, recycling, and composting programs to reduce the amount of solid waste entering landfills. Local jurisdictions are mandated to divert at least 50% of their solid waste generation into recycling. This Project would be subject to compliance with AB 939 (CalRecycle, 2025).

In addition to AB 939 the state also adopted AB 341 and AB 1826 (CalRecycle, 2025). AB 341 is a mandatory commercial recycling bill, and AB 1826 is mandatory organic recycling. Waste generated by the proposed Project would enter the City's waste stream but would not adversely affect the City's ability to meet AB 939, AB 341, or AB 1826, since the projects waste generation would represent a nominal percentage of the waste generated by the County. Therefore, impacts related to compliance with solid waste regulations would be less than significant and no mitigation is required.

3.20 Wildfire

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

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. Both Vine Street and Westgate Drive provide egress from the Project site. Vine Street is oriented east-west and would provide access to the east approximately one block to South Lower Sacramento Road. South Lower Sacramento Road is four lane divided highway-oriented north-south and would allow for emergency egress. Westgate Drive is oriented north-south, and would provide access south to Vine Street, or north to West Lodi Avenue. From West Lodi Avenue, it's approximately one block to South Lower Sacramento Road. From Vine Street, there is access either north or south, whichever is the necessary direction to safety. Additionally, once the school is in operation, it would not result in any actions that would significantly impair or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, impacts associated with adopted emergency response plans or emergency evacuation plans would be less than significant and no mitigation is required.

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

Less Than Significant Impact. The proposed Project would be located in a developing area within the Lodi city limits. The topography is flat, adjacent to a church campus on one site, and housing on

two other sides. The Project is located in a Local Responsibility Area and is not within a designated High Fire Area, according to the Office of the State Fire Marshall (Cal Fire, 2025). So the location and surrounding area would not exacerbate wildfire risks and exposing students to pollutant concentrations from wildfire or uncontrolled wildfire risk. Therefore, there is a less than significant impact and no mitigation is required.

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

Less Than Significant Impact. The proposed Project would include the construction of the proposed elementary school to support the residents in western Lodi. The proposed Project would not involve installation or maintenance of infrastructure that would exacerbate fire risk. Although the proposed Project would involve installation of utilities within the Project site, these utilities would be located underground and would not exacerbate fire risk. Therefore, impacts associated with installation or maintenance of associated infrastructure resulting in exacerbated fire risk would be less than significant and no mitigation is required.

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

Less Than Significant Impact. The Project site is relatively flat. There is no evidence of slope instabilities at the project site, and there are no significant slopes located on or near the Project site that may be considered susceptible to seismically induced landslides. During the grading phase of the proposed Project, the project site would be leveled. As such, upon completion of construction, the Project site would not be considered susceptible to landslides, post-fire instability, or drainage changes. As such, impacts would be less than significant and no mitigation is required.

3.21 Mandatory Findings of Significance

Issues	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Less Than Significant Impact with Mitigation Incorporated. As discussed above in Biological Resources, Cultural Resources, and Geology and Soils (Paleontology), with the incorporation of the Mitigations Measures outlined, the Project does not have the potential to substantially reduce habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self- sustaining levels, eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, eliminate important examples of the major periods of California history or prehistory or destroy paleontological resources. Mitigation Measures included to address potential impacts to nesting migratory birds, and potential impacts to cultural resources are reduced to less than significant levels.

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

Less Than Significant Impact with Mitigation Incorporated. When evaluating cumulative impacts, it is important to remain consistent with Section 15064(h) of the CEQA Guidelines, which states that an EIR must be prepared if the cumulative impact may be significant and the project's incremental effect, though individually limited, is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

Alternatively, a lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable through mitigation measures set forth in an MND or if the project will comply with the requirements in a previously approved plan or mitigation program (including, but not limited to, water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, plans or regulations for the reduction of greenhouse gas emissions) that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located.

The project would potentially result in impacts to biological resources, cultural resources, paleontology, noise, and Tribal Cultural Resources that could be potentially significant without the incorporation of mitigation. Thus, when coupled with biological resources, cultural resources, noise, and Tribal Cultural Resources, impacts related to the implementation of other related projects throughout the broader project area, the project would potentially result in cumulative-level impacts if these significant impacts are left unmitigated.

However, with the incorporation of mitigation identified herein, the project's impacts would be reduced to less than significant levels and would not considerably contribute to cumulative impacts in the greater project region. In addition, other related projects would presumably be bound by their applicable lead agency to (1) comply with the applicable federal, state, and local regulatory requirements; and (2) incorporate all feasible mitigation measures, consistent with CEQA, to further ensure that their potentially cumulative impacts would be reduced to less than significant levels.

Although cumulative impacts are always possible, the project, by incorporating all mitigation measures outlined herein, would reduce its contribution to any such cumulative impacts to less than cumulatively considerable; therefore, the project would result in individually limited, but not cumulatively considerable, impacts.

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

Less Than Significant Impact with Mitigation Incorporated. As evaluated throughout this document with incorporation of mitigation, environmental impacts associated with the Project would be less than significant. Thus, the Project would not directly or indirectly cause substantial adverse effects on human beings. Impacts would be less than significant with incorporation of mitigation.

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Appendix A

Air Quality, Greenhouse Gas, and Energy Impact Study

Appendix B

Threatened and Endangered Species Assessment

Appendix C

Cultural Desktop Review

Appendix D

Noise and Vibration Impact Study

Appendix E

Phase I Environmental Site Assessment

Appendix F

Traffic Studies (Trip Generation and VMT Screening Assessments)