Memorandum

TO: Edith Holbert
P: (209) 331-7121
E: eholbert@lodiusd.net

Lodi Unified School District
1305 E. Vine Street
Lodi, California 95240

FROM: Terracon Consultants, Inc.

DATE: February 25, 2026

RE: Lodi High School Athletic Field Improvements Project
CEQA Notice of Exemption and Categorical Exemption Memorandum
Terracon Project No: **NA257123**

Project Information:

The proposed project is located entirely within Lodi High School at 3 S. Pacific Avenue (Assessor Parcel Number [APN]: 035-110-12), in Lodi, San Joaquin County, California. The project area spans approximately 4.40 acres of an entirely landscaped area within the school's boundaries (**Exhibit 1**), and the project scope includes lighting improvements to the athletic field on campus.

As the actions associated with the proposed project are not expected to result in a significant environmental impact, it is expected that this project is exempt under the Class XI Categorical Exemption (Accessory Structures) and Class XIV Categorical Exemption (Minor Additions to Schools), as described in the California Code of Regulations, Title 15, Section 15300 et seq.

Legal Setting:

Categorical Exemptions (Cal. Code Regs. tit. 14 § 15300)

Projects that are not expected to result in a significant environmental impact may be Categorically Exempt from the California Environmental Quality Act (CEQA) review. As described in Cal. Code Regs. tit. 14 § 15300, *Section 21084 of the Public Resources Code requires these guidelines to include a list of classes of projects which have been determined not to have a significant effect on the environment, and which shall, therefore, be exempt from the provisions of CEQA. In response to that mandate, the Secretary for Resources has found that the following classes of projects listed in this article do not have a significant effect on the environment, and they are declared to be categorically exempt from the requirement for the preparation of environmental documents*.

Like many campus-improvement projects, the proposed project is not expected to result in any significant environmental impacts under CEQA. **Table 1** provides an abbreviated CEQA checklist, explaining why the implementation of the proposed project would not result in any significant environmental impacts.

Table 1. Abbreviated CEQA Environmental Checklist

Impact Category	Description
Aesthetics	The proposed project would not result in impacts related to scenic vistas or state-listed scenic highways as the nearest scenic location is California State Route 160, approximately 15 miles northwest of the school at its nearest. A lighting study and glare analysis was completed on February 23, 2026, and determined the project would not result in a significant impact. After project implementation, the project site will remain in compliance with the City of Lodi's Code of Ordinances (17.14.070 - Lighting; Ord. No. 1869, § 2, 2-20-2013).
Agriculture and Forestry Resources	The proposed project does not involve agricultural lands or Prime Farmland.
Air Quality	The proposed project would not result in the exposure of pollutants or odors to sensitive receptors. Although San Joaquin County is in nonattainment status for PM-2.5 (2006) and 8-Hour Ozone (2015) criteria pollutants, the proposed project would not result in a significant net increase of such pollutants, nor would the project conflict with the San Joaquin Valley Air Pollution Control District (Valley Air District)'s ability to comply with any applicable State Implementation Plan (SIP) as the emissions would be associated with the limited use of construction equipment. The equipment required for this project would be operated only as needed and for a limited amount of time.
Biological Resources	Due to the existing developed and landscaped nature of the site, the project area is not expected to provide habitat for federally- or state-listed species, nor would it affect the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP), or other sensitive biological resources.
Cultural Resources	The project area does not contain known historic properties and is not suspected to contain archaeological artifacts as the general area is previously developed. If archaeological or cultural resources are discovered onsite, work would cease immediately until consultation and approval to continue work was provided by a qualified archaeologist.
Energy	The proposed project would not result in an impact related to the wasteful or inefficient use of energy since the project will not require the use of equipment with high energy requirements during its operations.

Geology and Soils	The proposed project would not result in geological impacts. The project construction would take place on previously developed land and would not result in new construction in unsafe soils.
Greenhouse Gas Emissions	Although greenhouse gases would be emitted during project construction, it would not result in a significant impact on the environment, nor would it conflict with a plan, policy, or regulation aimed at reducing greenhouse gas emissions.
Hazards and Hazardous Materials	The proposed project does not involve the use or release of potentially hazardous substances. If necessary, an Abatement of Hazardous Materials Plan (AHMP) will be created prior to project construction to handle potential unexpected encounters with hazardous materials.
Hydrology and Water Quality	Local water quality impacts would be avoided by the usage of routine stormwater Best Management Practices (BMPs) during construction and material staging activities, if applicable.
Land Use and Planning	The proposed project does not divide an established community, nor does it result in a conflict with a land use plan or zoning ordinance as the project does not modify existing land use.
Mineral Resources	The proposed project does not require the extraction of Mineral Resources.
Noise	The proposed project would not result in the exposure of excessive noise levels. Construction is not planned to take place during the school year. Further, measures such as limiting construction to daytime hours and complying with County noise ordinances would avoid temporary construction-related noise impacts. The project would not result in any permanent noise impacts.
Population and Housing	The proposed project does not involve housing or population growth.
Public Services	The proposed project would not negatively affect public services but instead would improve the school's ability to provide safety for students on campus during early morning/evening hours (times of day with low natural lighting).
Recreation	The proposed project would not lead to the deterioration of other existing recreational facilities on campus, nor would it involve the construction of new facilities that would result in an adverse physical environmental consequence.

Transportation	While the school is located between two main thoroughfares (W Elm St and W Lodi Ave), the proposed project would not have a significant effect on transportation since construction will be small-scale and confined to campus. Furthermore, construction will occur outside of the school year when student drop-off/pick-up traffic patterns will not be affected by work.
Tribal Cultural Resources	The proposed project would not impact a listed or eligible resource as there are no known relationships to the site; however, if resources are discovered during any ground disturbing activities, work will cease immediately and both federally and state recognized tribes will be contacted.
Utilities and Service Systems	The proposed project does not involve the construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities. It will have no significant impact on water supplies and is not anticipated to generate solid waste in excess of state or local standards.
Wildfire	The proposed project does not involve Wildfire Hazards since the project will not increase fire loading.
Mandatory Findings of Significance	The proposed project does not have the potential to substantially degrade or reduce the habitat of a species, or impact known sensitive resources. The project would not result in a cumulatively considerable contribution to a cumulative impact.

Exceptions (Cal. Code Regs. tit. 14 § 15300.2)
It should be noted that six (6) exceptions are described, which if applicable to a project, would disqualify the project from the usage of a Categorical Exemption. These exceptions are:

(a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

(b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

(c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

(d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar

resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

(e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

(f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

Categorical Exemption Class XI – Accessory Structures (Cal. Code Regs.tit. 14 § 15311)
Class 11 projects are described in § 15311 as "*construction, or replacement of minor structures accessory to (appurtenant to) existing commercial, industrial, or institutional facilities.*" The athletic field lighting improvements on Lodi High School's existing property qualifies as the installation of accessory structures appurtenant to campus, and thus fits the description provided in Cal. Code Regs. tit. 14 § 15311.

Categorical Exemption Class XIV – Minor Additions to Schools (Cal. Code Regs.tit. 14 § 15314)
Class 14 projects are described in § 15314 as "*minor additions to existing schools within existing school grounds where the addition does not increase original student capacity by more than 25% or ten classrooms, whichever is less.*" The athletic field lighting improvements will take place entirely within Lodi High School's existing property. It does not involve the addition of ten or more classrooms, nor would it increase the school's student capacity by more than 25%. The proposed project fits the description provided in Cal. Code Regs. tit. 14 § 15314.

Summary:

The proposed project would not result in any significant impacts on the environment (please see **Table 1**). The activities that make up the proposed project (athletic field lighting improvements) meet both the description of a Class 11 and Class 14-exempt project as well as the criteria listed in the Exceptions to CEQA Categorical Exemptions.

The project area is not located on a hazardous waste site or other environmental features of critical concern. The proposed project would not result in a significant impact, nor would it result in a cumulatively considerable contribution to a significant cumulative impact. The project area is not in the vicinity of a Scenic Highway, and the project would not be expected to impact historical resources. No historic properties are known to exist in the project area; if artifacts were to be found during construction, work would stop immediately, and a qualified archaeologist would be consulted with before work were to resume.

The long-term effects of the project are likely to improve the school's ability to provide a safe environment for its students. Considering the data summarized in this memorandum, it is Terracon's opinion that the Lodi High School Athletic Field Improvements Project is Categorically Exempt from CEQA documentation.

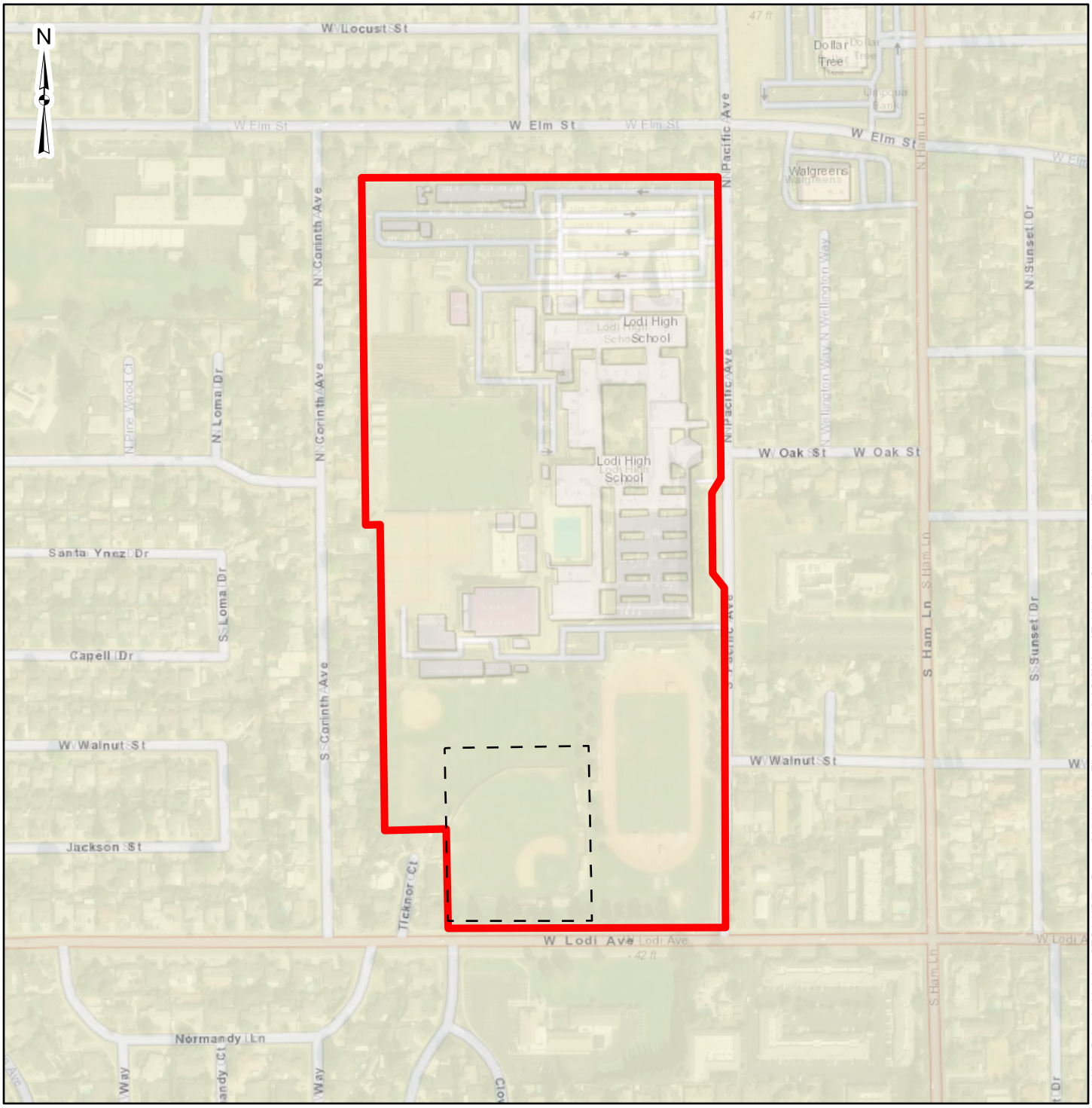
Sincerely,
Terracon Consultants, Inc.

Andrea Gonzalez
Staff Biologist

J. Hunter Watkins
Authorized Project Reviewer

Enclosures:

Exhibit 1 – Project Location
Notice of Exemption (NOE) Form
MD Acoustics Lighting Study



Legend

- Project Area (Approx. 4.4 ac)
- Site Boundary

0 200 400 800 Feet

1:4,800 1:4,800

DATA SOURCES:
ESRI WMS - World Aerial Imagery, OpenStreetMap

Project No.:	NA257123
Date:	Feb 2026
Drawn By:	AAG
Reviewed By:	JHW

Terracon
Explore with us

50 Goldenland Ct, Suite 100 Sacramento, CA 95834
PH. (916) 928-4690 terracon.com

SITE DIAGRAM

CEQA Notice of Exemption

Lodi High School
Lighting Project

Lodi, CA

Exhibit

1

C:\Users\aagonzalez\OneDrive - Terracon Consultants Inc\NA257123 Lodi High School - Lighting CEQA NOE - General\07 Working Files\01 Drafts\GIS\Maps\Exhibit_1_Site_Diagram\Exhibit_1_Site_Diagram.aprx

Print Form

Notice of Exemption

Appendix E

To: Office of Planning and Research
P.O. Box 3044, Room 113
Sacramento, CA 95812-3044

County Clerk
County of: San Joaquin
44 N San Joaquin Street, #260
Stockton, CA 95202

From: (Public Agency): Lodi Unified School District
1305 E. Vine Street
Lodi, CA 95240
(Address)

Project Title: Lodi High School Lighting Project

Project Applicant: Lodi Unified School District

Project Location - Specific:
Lodi High School, 3 S. Pacific Avenue, Lodi, CA 95242

Project Location - City: Lodi Project Location - County: San Joaquin

Description of Nature, Purpose and Beneficiaries of Project:
Lighting improvements to athletic field on school campus.

Name of Public Agency Approving Project: Lodi Unified School District

Name of Person or Agency Carrying Out Project: Lodi Unified School District

Exempt Status: **(check one):**

- ☐ Ministerial (Sec. 21080(b)(1); 15268);
- ☐ Declared Emergency (Sec. 21080(b)(3); 15269(a));
- ☐ Emergency Project (Sec. 21080(b)(4); 15269(b)(c));
- ☒ Categorical Exemption. State type and section number: Cal. Code Regs. tit. 14 § 15311 and 15314
- ☐ Statutory Exemptions. State code number: _____

Reasons why project is exempt:
Proposed project would not result in a significant environmental impact and is not disqualified by any of the exceptions to CEQA exemptions.

Lead Agency Contact Person: Edith Holbert Area Code/Telephone/Extension: (209) 331-7121

If filed by applicant:

1. Attach certified document of exemption finding.
2. Has a Notice of Exemption been filed by the public agency approving the project? Yes No

Signature: _____ Date: _____ Title: _____

Signed by Lead Agency Signed by Applicant

Authority cited: Sections 21083 and 21110, Public Resources Code.
Reference: Sections 21108, 21152, and 21152.1, Public Resources Code.

Date Received for filing at OPR: _____

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Chandler, AZ 85249
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Simi Valley, CA 93065
p. (805) 426-4477

www.mdacoustics.com

February 23, 2026

Mr. J. Hunter Watkins
Terracon
50 Goldenland Court, Suite 100
Sacramento, CA 95834

Subject: Lodi High School – Lighting Study, City of Lodi, CA

Dear Mr. Watkins:

MD Acoustics, LLC (MD) has completed the photometric analysis for the lighting plan proposed for the Lodi High School project over the area encompassed by the Baseball Field and Softball Field located in the facilities at 3 S Pacific Avenue, in the City of Lodi, California. This letter report evaluates the existing light levels (foot-candles) to the preliminary lighting plan (prepared by Musco Lighting, 9/19/2025) and to the City's lighting general development standards. Also, this report presents a glare analysis to ensure that roadways are not impacted by glare as required per the City's standards. Appendix A contains lighting definitions for your convenience.

1.0 Assessment Overview

MD conducted a site visit on 02/06/25 to evaluate the existing light conditions at the project site. MD utilized an LX1330B digital illuminance/light meter that can measure from 0 to 200,000 lux (0 to 18,580 foot-candles). The existing light conditions were compared to the preliminary photometric lighting plan and the requirements outlined by the City's General Property Development and Use Standards, Section 17.14.070.

Per the City of Lodi Land Use Plan, the site has a current land use classification of Public or Quasi-Public use. Land uses surrounding the site include existing residential areas in all directions. The proposed equipment layout is shown in Appendix B.

2.0 City of Lodi Lighting Requirements

Section 17.14.070 Lighting of the City's Code outlines the following as it relates to minimum lighting requirements:
Exterior lighting on private property within the city shall comply with the requirements of this section.

A. Exterior lighting fixtures shall not exceed a height of twenty feet or the height of the nearest building, whichever is less.
B. Lighting shall be energy-efficient, and shielded or recessed so that direct glare and reflections are confined to the maximum extent feasible within the boundaries of the site, and shall be directed downward and away from adjoining properties and public rights-of-way.
C. No permanently installed lighting shall blink, flash, or be of unusually high intensity or brightness, as determined by the director.
D. All lighting fixtures shall be appropriate in scale, intensity, and height to the use they are serving.
E. All lighting shall be properly maintained.

Therefore, the project must, at a minimum, provide sufficient lighting to satisfy the exterior code requirements. Additionally, the project shall assure that the glare impact on roadways is not significant as required per City's Development Code.

3.0 Evaluation and Findings

Some land uses are considered more sensitive to light than others, such as hotels, residential neighborhoods, and nursing homes. Although humans may observe light at 0.1 lumens, it would not make a substantial difference, especially if lighting is already present within the area of introduction. For example, approximately 400 lumens per square meter would be generally acceptable for a reading area.

According to the Illumination Engineering Society (IES), the recommended average footcandle level for a baseball field is 20 to 50 footcandles for recreational/non-broadcast and 70 to 100 footcandles for competitive/professional or broadcast.[1] Thus, a significant impact would occur if sensitive land uses (such as residences) were exposed to a substantial increase in sources of light, if that level of light was not previously present. Similarly, mobile source lighting impacts would be significant if residential or other light-sensitive uses are introduced to new light sources along roadways and driveways.

This report compares the lighting conditions to four (4) scenarios: 1) Existing lighting levels, 2) Project lighting levels, and 3) Existing plus project lighting conditions.

Existing

MD measured the lighting levels in foot candles (at the locations shown on Exhibit A) at or close to the project site (see Exhibit A), which considers the light from vehicles along close roadways, existing residential, and Public lights. The existing light levels measured between 0 and 20.5 foot candles, with a maximum of 1.00 foot candles at the residential property line.

Project

The project will utilize nighttime lighting for operational purposes for sports and recreational events. The updated preliminary lighting plan (dated 9.19.25 and shown in Exhibit B) shows that the project's lighting levels at the east perimeter will range between 0 and 5.13 foot-candles. Also, the lighting plan shows a perimeter wall between the project site and the existing residential uses. This increase will change the existing conditions at said residences from 0.01 to 5.13 foot-candles. This lighting impact will meet the City standards, since the direct glare and reflections are confined to the maximum extent feasible within the boundaries of the site. There is no specific limit set forth by the City's Code Section 17.14.070, and also Section 17.26.040 states that the development standards within the PF zoning district will be determined by the city through the project review process.

Existing plus Project

The project adds between 0.01 to 5.13 foot-candles to the existing light conditions at the adjacent residential land uses. The existing lighting conditions measured at the project's site showed a minimal lighting exposure between 0.01 to 1.0 foot-candles to the adjacent existing residential land uses adjoining the eastern property line.

[1] https://waypointlighting.com/uploads/2/6/8/4/26847904/ies_recommended_light_levels.pdf

Therefore, the project exterior lighting plan has the potential to reach up to 5.13-foot candles at the southeast property line between the residences. This lightning level is similar to the level recommended for a parking lot area. Also, the project lighting plan includes an integrated architectural design with the surrounding developments and considers light fixtures that are oriented downward and shielded, so glare is confined to the project parcel. Additionally, the proposed light fixtures do not blink or flash and are not of unusually high intensity or brightness.

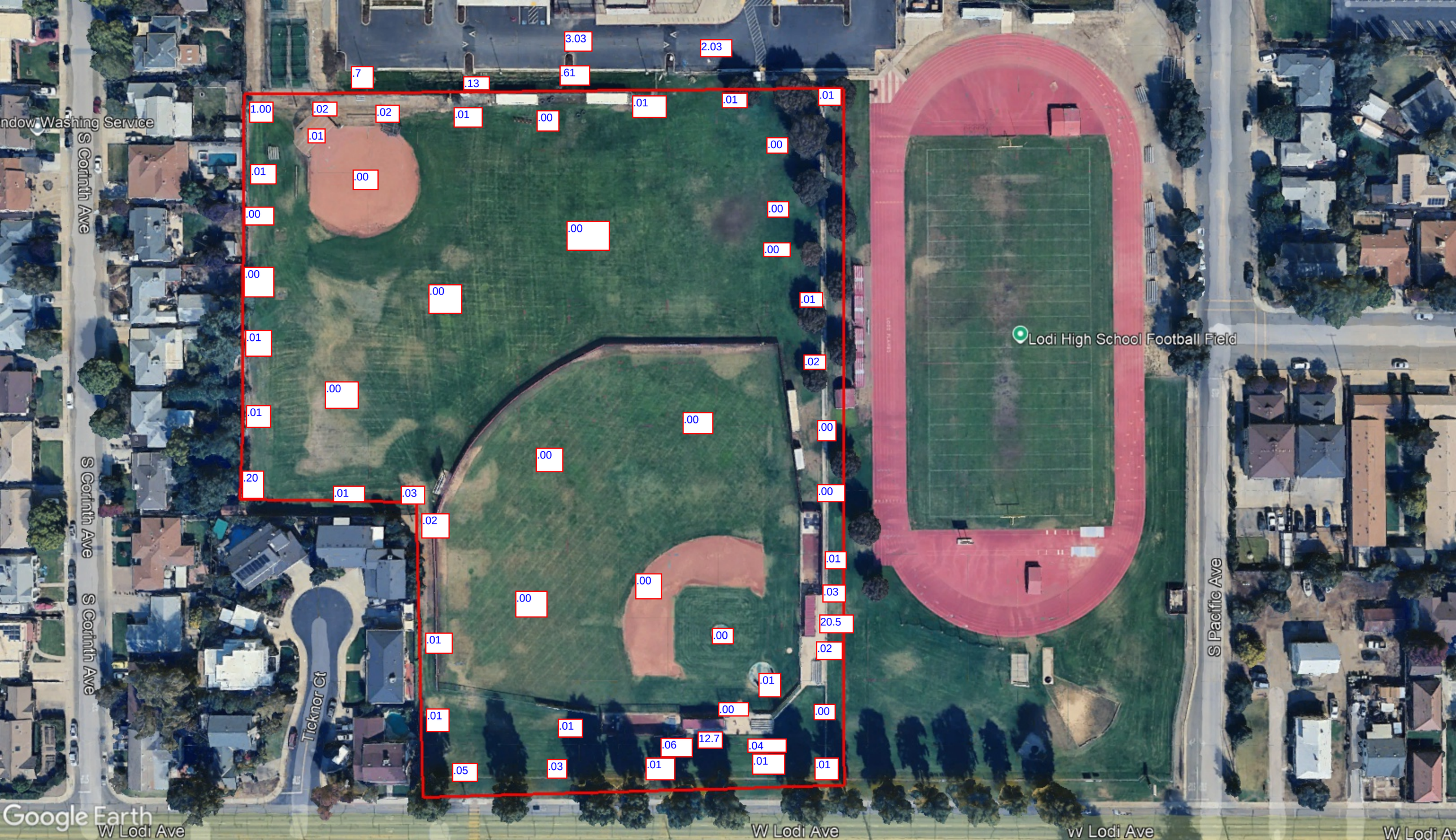
4.0 Conclusions

MD is pleased to provide this evaluation. The project exterior lighting plan meets the City's ordinance requirements; additionally, the lighting fixtures do not create a significant glare impact on roadways and sensitive receptors. If you have any questions regarding this analysis, please don't hesitate to call us at (805) 426-4477.

Sincerely,
MD Acoustics, LLC

Francisco Irarrazabal, MS, INCE-USA
Consultant

Exhibit A
Existing Lighting Conditions



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Lodi High School Football Field
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S Corinth Ave
S Corinth Ave
Ticknor Ct
S Pacific Ave
W Lodi Ave
W Lodi Ave
W Lodi Ave
Google Earth

Exhibit B
Photometric Analysis

Lodi High School Softball And Baseball Field

Lodi,CA

Grid Summary

Name:	**Spill 5'**
Spacing:	30.0' x 10.0'
Height:	5.0' above grade

Illumination Summary

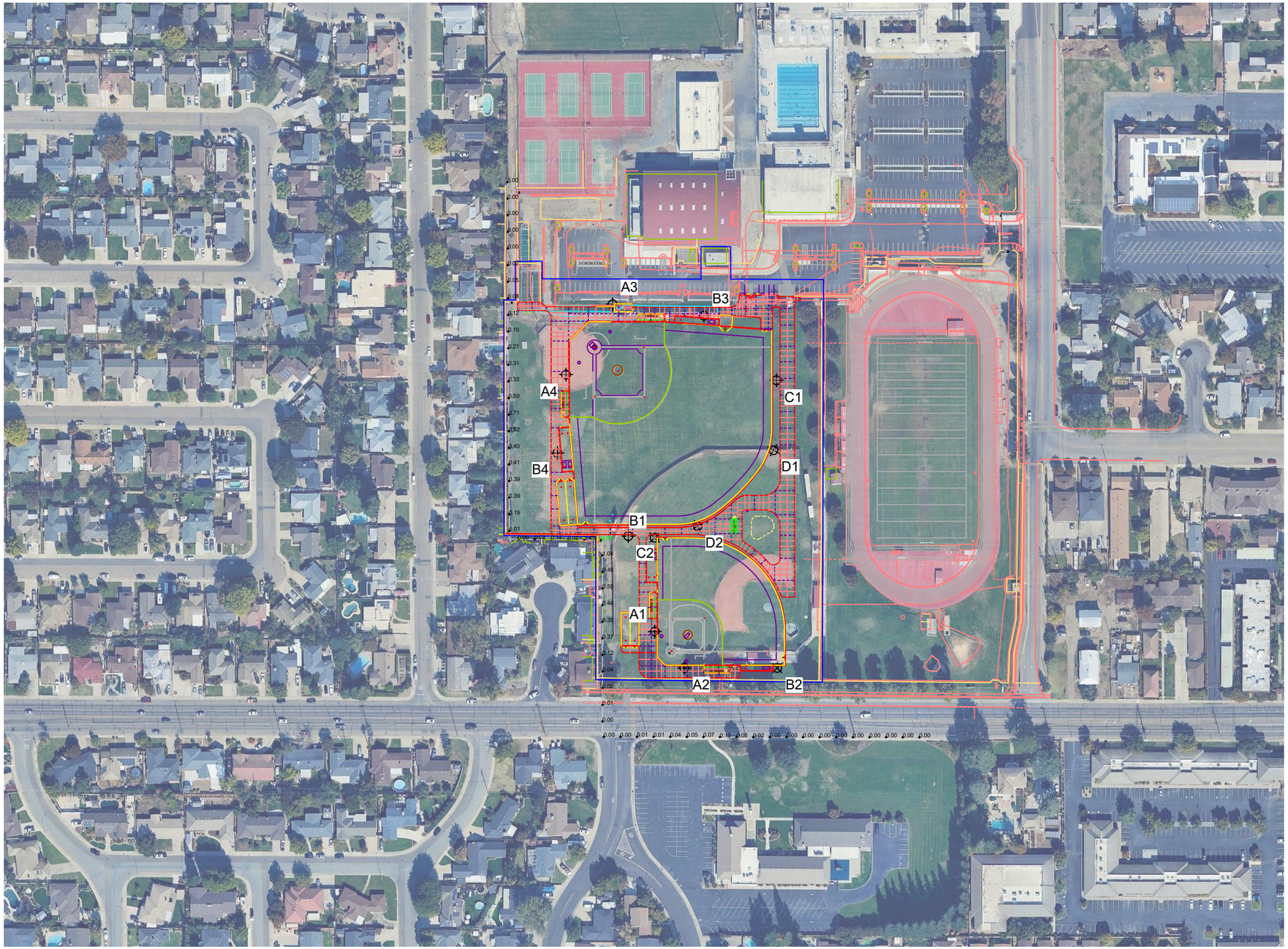
	MAINTAINED MAX VERTICAL FOOTCANDLES
	Entire Grid
Scan Average:	**0.27**
Maximum:	5
Minimum:	0
No. of Points:	59
FIXTURE INFORMATION	
Applied Circuits:	A,B,C,D
No. of Fixtures:	**79**
Total Load:	75.47 kW

Guaranteed Performance: The ILLUMINATION described above is guaranteed per your Musco Warranty document.

Field Measurements: Individual field measurements may vary from computer-calculated predictions.

Electrical System Requirements: Refer to Amperage Draw Chart and/or the **"Musco Control System Summary"** for electrical sizing.

Installation Requirements: Results assume ± 3% nominal voltage at line side of the driver and structures located within 3 feet (1m) of design locations.



SCALE IN FEET 1 : 200

0' 200' 400'

Pole location(s) ⊕ dimensions are relative to 0,0 reference point(s) ⊠

ENGINEERED DESIGN By: William Isiminger • File #247112D • 19-Sep-25

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Appendix A

Glossary of Lighting Terms

Glossary of Terms

Foot-Candle *is* a unit of illumination (now little used) equal to that given by a source of one candela at a distance of one foot (equivalent to one lumen per square foot or 10.764 lux).

Lumen *is* a measure of the total amount of visible light (to the human eye) from a lamp or light source. The higher the lumen rating the "brighter: the lamp will appear (Integral LED, 2015). This light, as low as 0.1 lumens is visible to the human eye, and the average household lightbulb (60 watts) emits approximately 800 lumens (at the source).

Lux *is* the SI unit of illuminance, equal to one lumen per square meter.

Appendix B

Project Equipment Layout

Lodi High School Softball And Baseball Field

Lodi,CA

Grid Summary

Name:	**Egress Blanket Grid**
Spacing:	30.0' x 30.0'
Height:	3.0' above grade

Illumination Summary

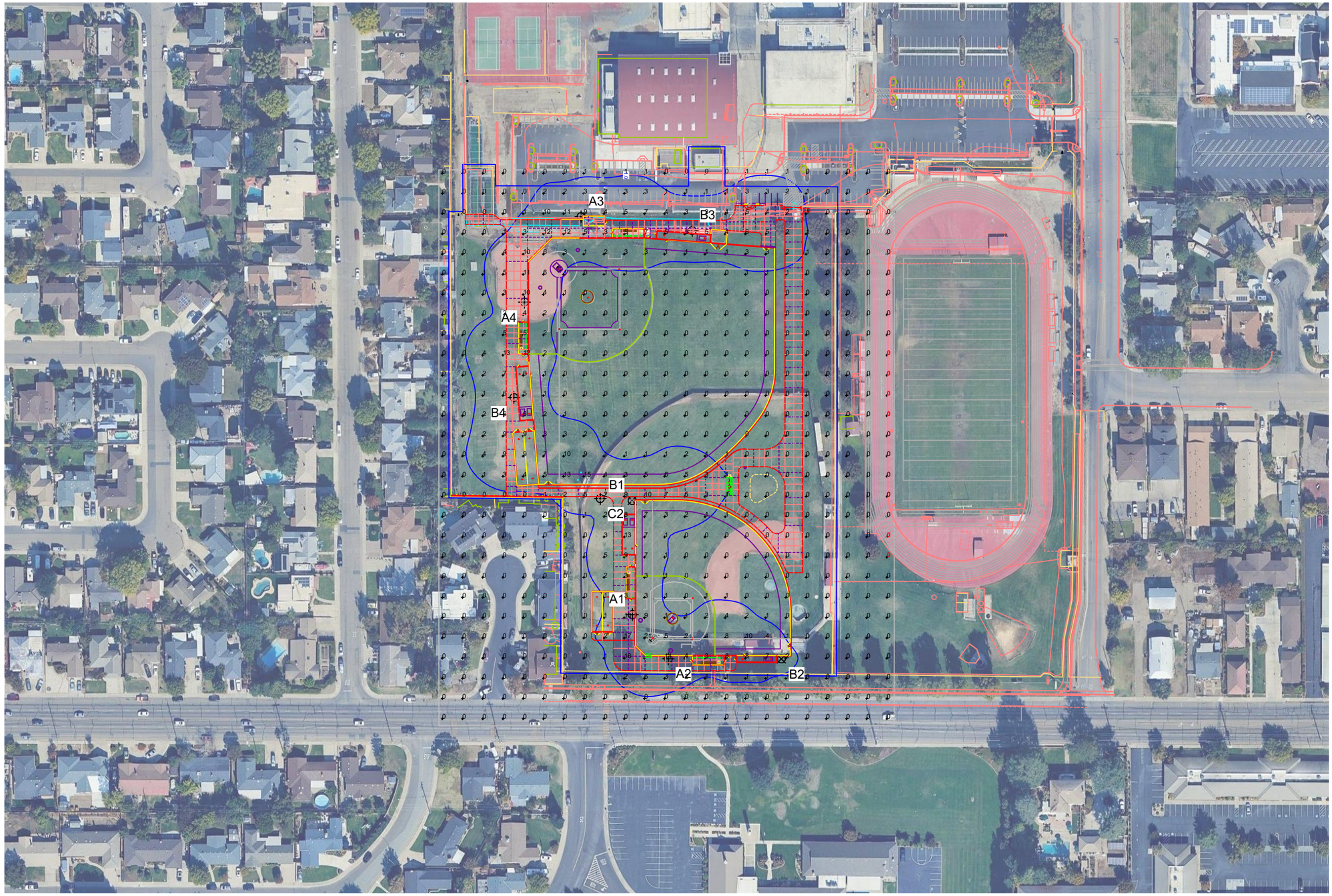
	MAINTAINED HORIZONTAL FOOTCANDLES
	Entire Grid
Scan Average:	**1.40**
Maximum:	25
Minimum:	0
No. of Points:	644
FIXTURE INFORMATION	
Applied Circuits:	D
No. of Fixtures:	**12**
Total Load:	6.32 kW

Guaranteed Performance: The ILLUMINATION described above is guaranteed per your Musco Warranty document.

Field Measurements: Individual field measurements may vary from computer-calculated predictions.

Electrical System Requirements: Refer to Amperage Draw Chart and/or the **"Musco Control System Summary"** for electrical sizing.

Installation Requirements: Results assume ± 3% nominal voltage at line side of the driver and structures located within 3 feet (1m) of design locations.



SCALE IN FEET 1 : 150

0' 150' 300'

Pole location(s) ⊕ dimensions are relative to 0,0 reference point(s) ⊗

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ILLUMINATION SUMMARY