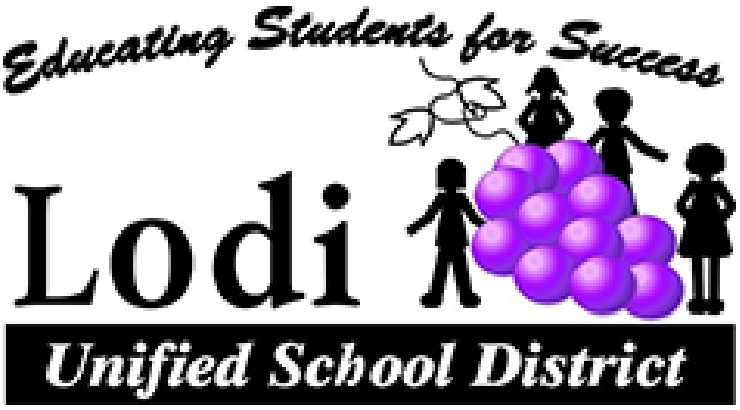

Public Review Draft

Initial Study/
Mitigated Negative Declaration

For the

Lodi High School – Measure U Campus School Repair Project

December 2018

PUBLIC REVIEW DRAFT

INITIAL STUDY/ PROPOSED MITIGATED NEGATIVE DECLARATION

FOR THE

Lodi High School – Measure U Campus Repair and Improvements Project

Lodi Unified School District
Educating Students for Success

Prepared by
Lodi Unified School District
1305 E Vine Street
Lodi, CA 95240

December 2018

NOTICE OF AVAILABILITY AND NOTICE OF INTENT
TO ADOPT A MITIGATED NEGATIVE DECLARATION FOR THE
LODI UNIFIED SCHOOL DISTRICT
LODI HIGH SCHOOL – MEASURE U CAMPUS SCHOOL REPAIR AND IMPROVEMENTS PROJECT

The Lodi Unified School District has prepared an Initial Study pursuant to California Environmental Quality Act (CEQA) and the CEQA Guidelines (Public Resources Code, Division 13 and California Code of Regulations, Title 14, Chapter 3) evaluating the potential environmental impacts of the Lodi High School – Measure U Campus School Repair and Improvements Project. The Lodi Unified School District proposes to adopt a Mitigated Negative Declaration ("MND") because the Project construction and operation would not have a significant effect on the environment. This MND and the Initial Study describe the reasons that this project will not have a significant effect on the environment and, therefore, does not require the preparation of an environmental impact report under CEQA.

FILE NUMBER: 68585-160

PROJECT TITLE: LODI HIGH SCHOOL – MEASURE U CAMPUS SCHOOL REPAIR AND IMPROVEMENTS PROJECT

PROJECT LOCATION: The Project is located at the Lodi High School campus in the City of Lodi, San Joaquin County, approximately 2.75 miles west of Highway 99. The Lodi High School is located in a primarily suburban area, adjacent to S Pacific Avenue, W Lodi Avenue and S Corinth Avenue on the east, south, and west, respectively. The Lodi High School address is 3 S Pacific Avenue (APN: 035-110-12), Lodi, California, and consists of 44.52 acres of campus encompassing three gymnasiums, ninety-one classrooms, one cafeteria, one theatre complex, four computer labs, an administration center, counseling center, a college and career center, plus wood and automotive technology shops. The campus includes district Maintenance and Operation Facilities, an agricultural field, track and field, two baseball diamonds, and several basketball and tennis courts. The City of Lodi General Plan 2010 designates the Lodi High School as Public/Quasi-Public. A regional and project location map are included as Figures 1 and 2, respectively. A project extent map is included as Figure 3.

PROJECT DESCRIPTION: The Lodi Unified School District is proposing school repair and improvements to the northern and eastern portions of the Lodi High School with funding provided by Measure U. The proposed improvements include the demolition/relocation of existing Maintenance and Operations buildings off campus, the removal of approximately thirty-five existing modular classrooms, and new construction of one and two-story classroom buildings in the northeastern portion of the site which will include a minimum of fifty-two (52) classrooms and six (6) science labs. A new one-story addition to the existing Administration Building will be constructed easterly from the existing structure. Associated improvements will consist of construction of two new asphalt concrete parking lots; one staff parking lot is planned for the northwest portion of the site, which replaces the parking currently on the northeast portion where the new buildings are planned, and one additional student parking lot south of the Administration Building. The proposed school repair and improvements are intended to service the current student body and faculty attending Lodi High School. The proposed project will not serve to facilitate any anticipated growth in enrollment and/or employment.

PUBLIC REVIEW PERIOD: As mandated by State law, the minimum public review period for this document is 30 days. The proposed Mitigated Negative Declaration will be circulated for a 30-day public review period, beginning on **Thursday, December 13, 2018** and ending on **Tuesday, January 15, 2019**. Copies of the Draft Negative Declaration are available for review at the following location:

- **Lodi Unified School District**, 1305 E. Vine Street, Lodi, CA 95240; and
- **Online at** www.lodiusd.net

Any person wishing to comment in writing on the Initial Study and proposed Negative Declaration must have submitted such comments in writing **no later than 5:00 pm on Tuesday, January 15, 2019** to the following address:

Daniel E. Kramer
Petralogix Engineering, Inc.
26675 Bruella Road
Galt, CA 95632

Facsimiles at (209) 336-0837 were also be accepted up to the comment deadline.

A public hearing to receive comments will be held at Lodi Unified School District. This meeting is scheduled for Tuesday, January 15, 2019 at 7:00 p.m. in the James Areida Education Board Room at 1305 E. Vine Street, Lodi.

Leonard Kahn, Chief Business Officer

12/11/2018
Date

TABLE OF CONTENTS

LIST OF EXIBITS

1. PROJECT TITLE

Lodi High School – Measure U Campus School Repair and Improvements Project

2. LEAD AGENCY NAME AND ADDRESS

Lodi Unified School District
1305 E Vine Street
Lodi, CA 95240

3. CONTACT PERSONS

Leonard Kahn: 209-331-7121

4. PROJECT LOCATION

The Project is located at the Lodi High School campus in the City of Lodi, San Joaquin County, approximately 2.75 miles west of Highway 99. The Lodi High School is located in a primarily suburban area, adjacent to S Pacific Avenue, W Lodi Avenue and S Corinth Avenue on the east, south, and west, respectively. The Lodi High School address is 3 S Pacific Avenue (APN: 035-110-12), Lodi, California, and consists of 44.52 acres of campus encompassing three gymnasiums, ninety-one classrooms, one cafeteria, one theatre complex, four computer labs, an administration center, counseling center, a college and career center, plus wood and automotive technology shops. The campus includes district Maintenance and Operation Facilities, an agricultural field, track and field, two baseball diamonds, and several basketball and tennis courts. The City of Lodi General Plan 2010 designates the Lodi High School as Public/Quasi-Public. A regional and project location map are included as Figures 1 and 2, respectively. A project extent map is included as Figure 3.

5. PROJECT SPONSOR'S NAME AND ADDRESS

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

6. PROJECT DESCRIPTION

The Lodi Unified School District is proposing school repair and improvements to the northern and eastern portions of the Lodi High School with funding provided by Measure U. The proposed improvements include the demolition/relocation of existing Maintenance and Operations buildings off campus, the removal of approximately thirty-five existing modular classrooms, and new construction of one and two-story classroom buildings in the northeastern portion of the site which will include a minimum of fifty-two (52) classrooms and six (6) science labs. A new one-story addition to the existing Administration Building will be constructed easterly from the existing structure. Associated improvements will consist of construction of two new asphalt concrete parking lots; one staff parking lot is planned for the northwest portion of the site, which replaces the parking currently on the northeast portion where the new buildings are planned, and one additional student parking lot south of the Administration Building. The

proposed school repair and improvements are intended to service the current student body and faculty attending Lodi High School. The proposed project will not serve to facilitate any anticipated growth in enrollment and/or employment.

7. SURROUNDING LAND USES AND SETTING

The proposed Project is located in the northern portion of the Lodi High School campus. To the north are residential homes followed by W Elm Street. To the east is S Pacific Avenue, followed by residential homes and a church. A residential street, Ticknor Court, is located south/southwest of the southern portion of the campus followed by W Lodi Avenue. To the west of the campus is residential homes followed by S Corinth Avenue. The surrounding area is primarily designated Low Density Residential, with some Mixed-Use Center and Commercial designations, per the City of Lodi General Plan.

8. NECESSARY PUBLIC AGENCY APPROVALS

It is anticipated that the following "typical" permits and compliance may be needed for this Project:

- Lodi Unified School District: Lead agency with responsibility for approving the proposed school repair and improvement project. Preparation of a Stormwater Pollution Prevention Plan (SWPPP) to City of Lodi standards. Pollutant Discharge Elimination Permit (Stormwater/Erosion Control) issued by the City of Lodi.
- Department of Toxic Substances Control (DTSC): DTSC oversees the environmental review process used to establish if a release or threatened release of hazardous material and/or presence of naturally occurring hazardous material exists at new or expanding school sites and if it presents a risk to the environment and/or human health.
- United States Fish and Wildlife Service – Compliance with the Federal Endangered Species Act: Construction activities would not directly or indirectly adversely affect a federally listed species or its habitat (see Biological Resources section of this document for additional information). Therefore, the proposed project would not be required to obtain Section 7 clearance from the U.S. Fish and Wildlife Service prior to SRF loan commitment.
- State Historic Preservation Office – Compliance with the National Historic Preservation Act: There are no prehistoric or historic archaeological resources, historic properties, or resources of value to local cultural groups within the project area. Therefore, the proposed project would not be required to demonstrate to the satisfaction of the State Historic Preservation Office that the project complies with Section 106 of the National Historic Preservation Act (see Cultural Resources section of this document for additional information).
- Native American Heritage Commission: Compliance with Assembly Bill 52 (AB 52). Lead agencies consult with Native American tribes who have previously contacted the Lead Agency early in the CEQA planning process.
- San Joaquin Valley Air Pollution Control District (SJVAPCD): Air Quality mitigation permit for grading work.

- City of Lodi: Preparation of a SWPPP to County of San Joaquin (and City of Lodi) standards. Pollutant Discharge Elimination Permit issued by the County of San Joaquin (and the City of Lodi).

9. PROJECT CONSTRUCTION

Project construction is expected to begin by April 2020 with completion of the proposed project expected July 2021. Construction will likely consist of a wood-frame construction with interior concrete slab-on-grade lower floors. The new construction is currently estimated as 80,000 square feet; parking lot development will be approximately 4 acres.

Construction activity will first include demolition of current structures, vegetation removal, and removal of existing concrete flatwork and asphalt. Based on the demolition and site clearing operations which will disturb the surface and near-surface soils creating loose and variable conditions, it is recommended all disturbed soils within building pads and all site structural areas be sub-excavated, processed, and re-compacted as engineered fill to promote uniform support (MPE, 2018). The on-site soils are considered suitable for use as engineered fill materials, provided they are free of rubble, debris, roots and organics, and have the proper moisture content to achieve the desired degree of compaction (MPE, 2018). Roadways will be swept clean as needed. Water will be applied to any potential dust-generating materials during construction.

The Project has been designed to eliminate environmental impacts by requiring the following measures:

- Project design to meet City of Lodi and applicable San Joaquin County design standards.
- Air Quality Mitigation and Permitting through SJVAPCD.
- Preparation of a Stormwater Pollution Prevention Plan (SWPPP) to County of San Joaquin and City of Lodi standards.
- Pollutant Discharge Elimination Permit (Stormwater/Erosion Control) issued by the County of San Joaquin and City of Lodi.

A Stormwater Pollution Prevention Plan (SWPPP) and an Erosion and Sediment Control Plan will be prepared and implemented to avoid and minimize impacts on water quality during construction and operations. Best management practices (BMPs) for erosion control will be implemented to avoid and minimize impacts on the environment during construction.

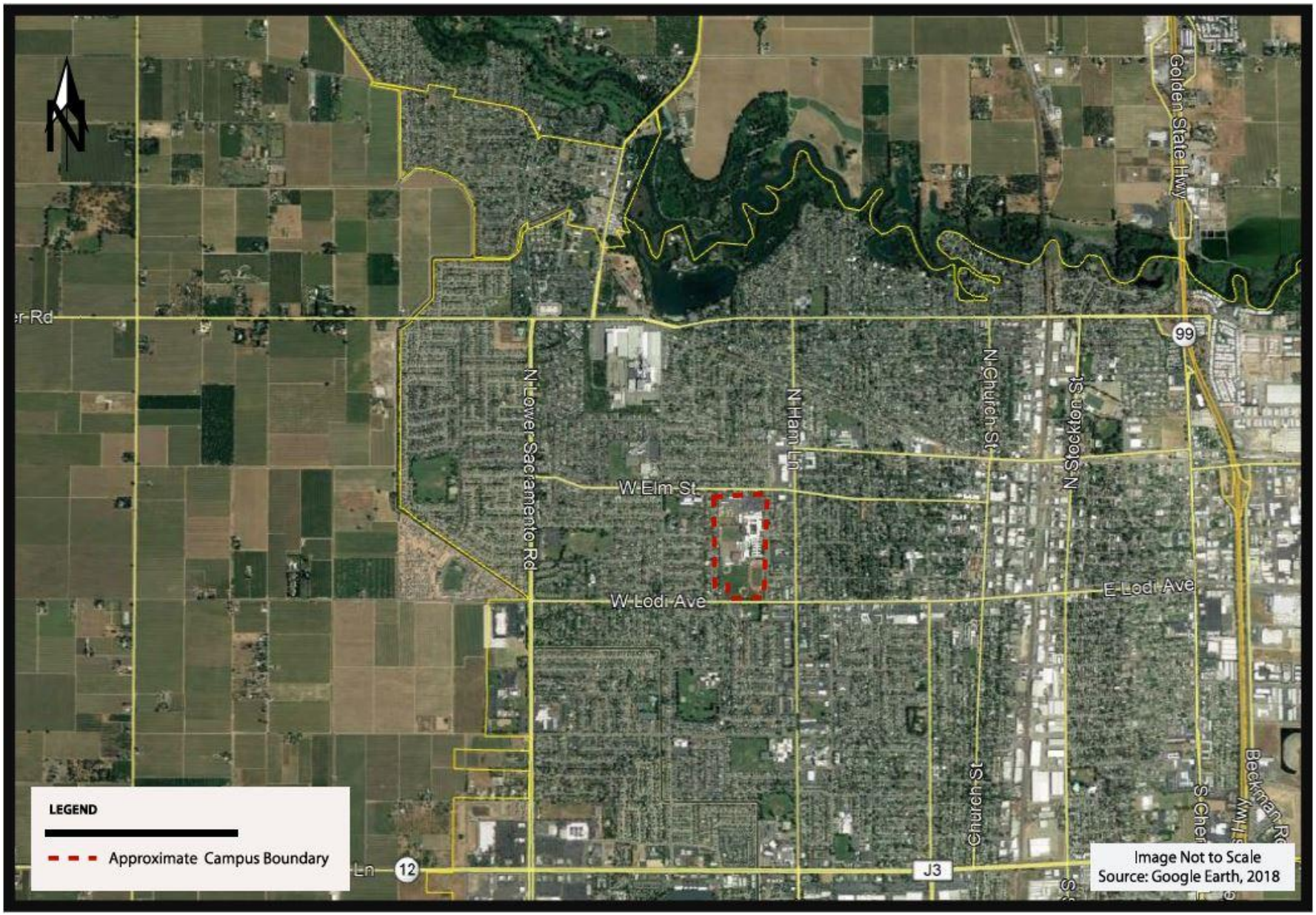

Figure 1 - Regional Map

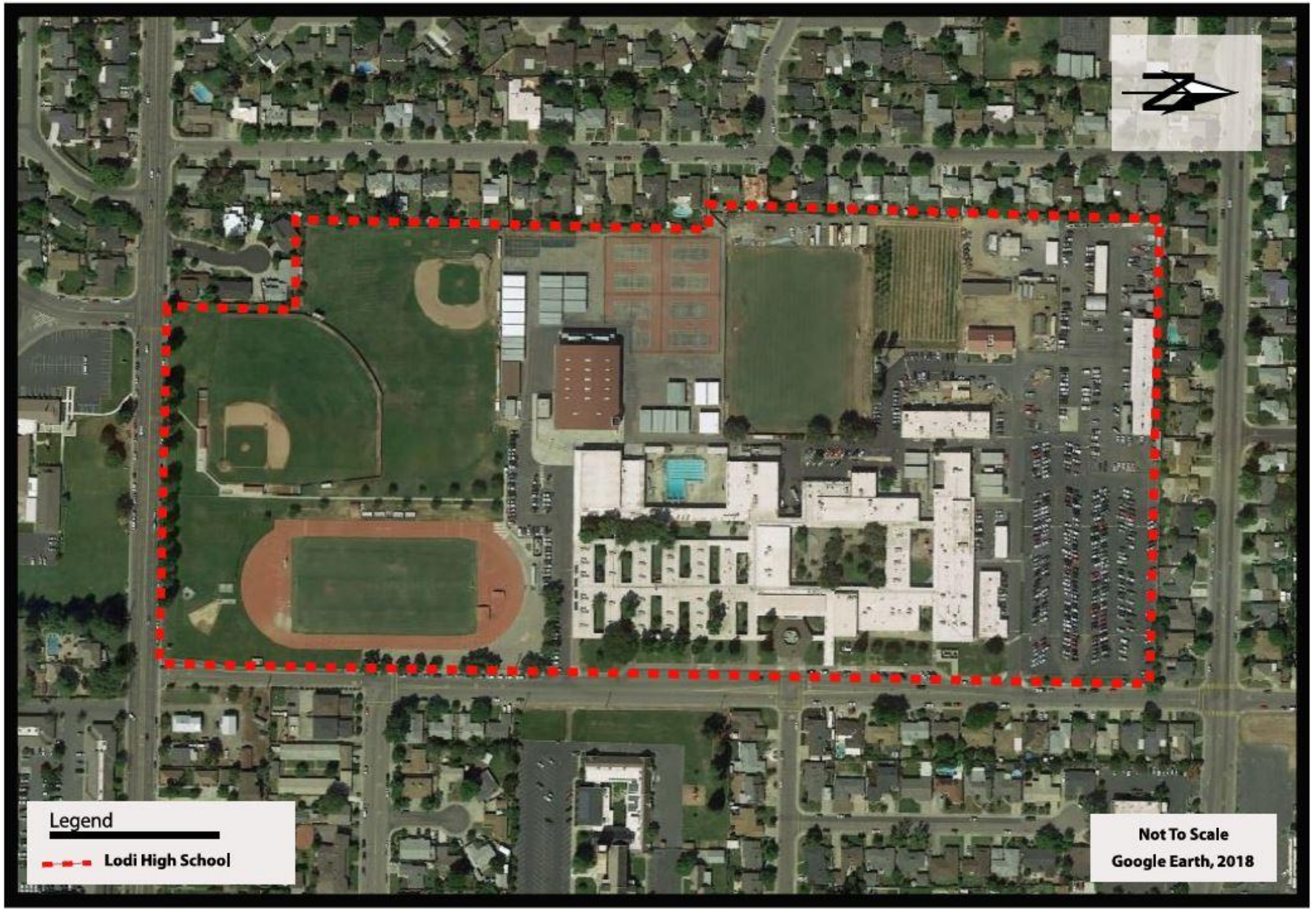

Figure 2 - Campus Map

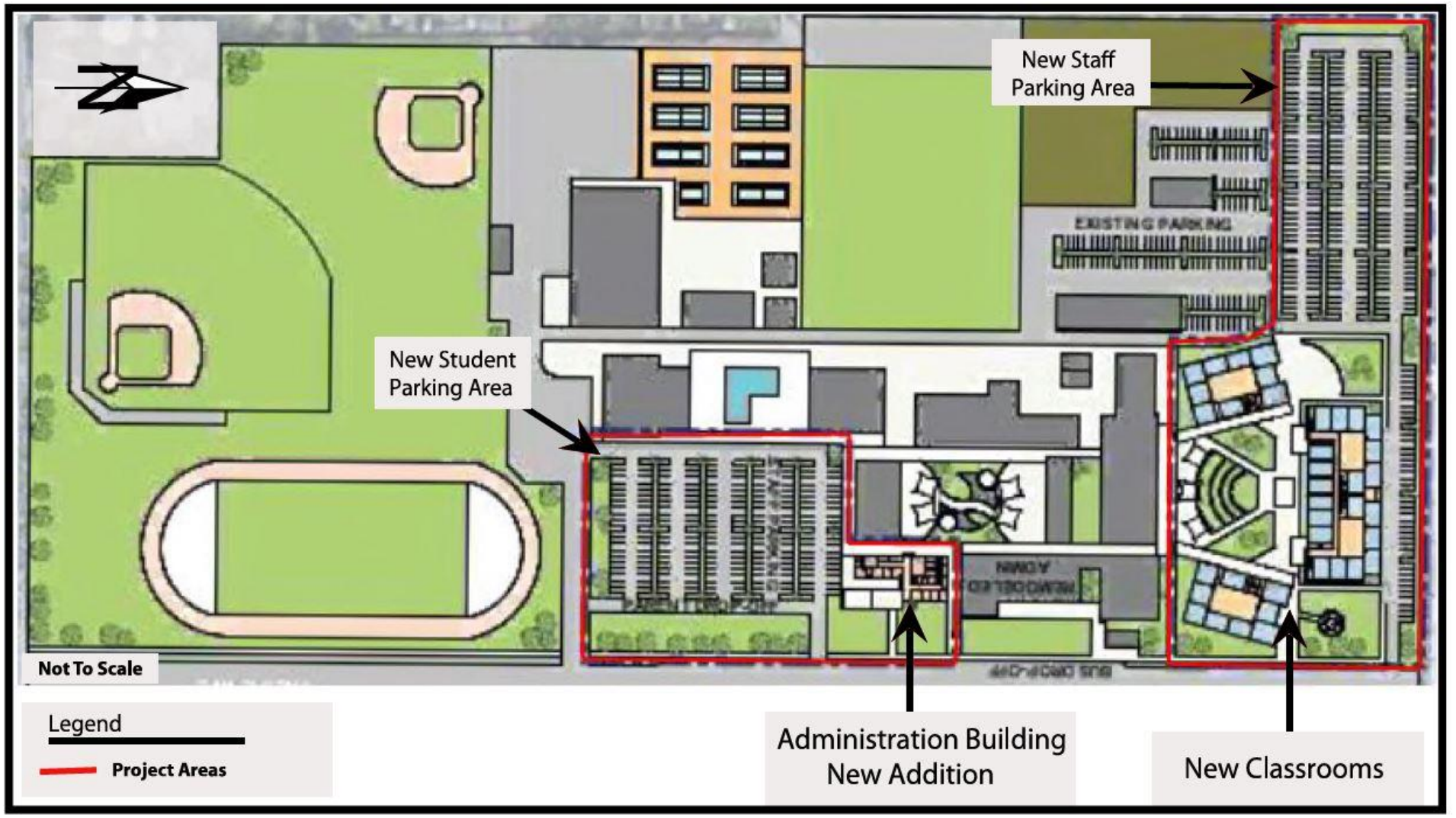

Figure 3 – Lodi High School Project Extent Map

10. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project as indicated by the checklist on the following pages.

Environmental Factors Potentially Affected		
☐ Aesthetics	☐ Agriculture Resources	☒ Air Quality
☒ Greenhouse Gas Emissions	☒ Biological Resources	☒ Cultural Resources
☒ Geology/Soils	☒ Hazards & Hazardous Materials	☐ Hydrology/Water Quality
☐ Land Use/Planning	☐ Mineral Resources	☒ Noise
☐ Population/Housing	☐ Public Services	☐ Recreation
☒ Transportation/Traffic	☐ Utilities/Services Systems	
☒ None With Mitigation	☐ Mandatory Findings of Significance	

11. ENVIRONMENTAL DETERMINATION

☐ I find that 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 measure 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.

Leonard Kahn, Chief Business Officer

12/11/2018
Date

12. ENVIRONMENTAL CHECKLIST

I. Aesthetics

Issues		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
Would the Project:					
a.	Have a substantial adverse effect on a scenic vista?	☐	☐	☐	■
b.	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	■	☐
c.	Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	■	☐
d.	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	■	☐

a) **No Impact**. The San Joaquin County General Plan does not identify any scenic vistas within the Project area.

b) **Less Than Significant Impact.** No State “designated scenic highways” or “eligible scenic highways” are located within the vicinity of the project site (California Scenic Highway Program). There are no rock outcroppings, or historic buildings located on the project site.

c) **Less Than Significant Impact.** The Project would remove approximately 35 existing modular classrooms, and new northeastern campus classrooms (one and two-story) and administrative building addition (north of the track and field) will be constructed. The Facility Master Plan will be considered for the architectural design. The two-story building will be a maximum of 30 feet in height, with a setback of sixty-five feet from the northern boundary and approximately 60-foot setback from the eastern boundary. The Project would visually blend and improve upon the campus aesthetics. Therefore, this is a less than significant impact.

d) **Less Than Significant Impact.** The Lodi High School repairs and improvements will have the appropriate level of outdoor lighting for the convenience and security of the public during any nighttime activities. There will be approximately 60 new parking lights spread between the new staff parking in the middle-eastern portion of the site as well as the new student parking area in the north-western portion of the site. The campus will run half the lights on a “night light” circuit which is dusk till dawn, Monday – Sunday; the other half of the lights will run on a “evening circuit” from 4:00 am to 7:30 am and 4:30 pm to 10:30 pm Monday through Friday. There will be approximately 12 smaller profile light fixtures in the quad area of the new structure proposed in the northeast portion of the site. Any additional exterior lighting will be appropriately directed to the immediate campus property, and not toward adjacent properties, roadways, or future land uses. Nighttime lighting for the campus is currently present on the site. The light and glare associated with the project will remain within the project’s environment; this impact is therefore considered less than significant.

Figure 4: 3D Rendering of Two-Story Classrooms Planned for the Northeast Portion of the Site.

II. Agricultural Resources

Issues		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
	In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the Project:				
a.	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program in the California Resources Agency, to non-agricultural use?	☐	☐	☐	■
b.	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	■
c.	Conflict with existing zoning for, or cause rezoning of forest land (as defined in PRC Sec. 4526), or timberland zoned Timberland Production (as defined in PRC Sec. 51104 (g)?	☐	☐	☐	■
d.	Result in loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	■
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?	☐	☐	☐	■

a-e) **No Impact.** According to the California Department of Conservation's (DOC) San Joaquin County Important Farmland Map, 2016, the project site is identified as "Urban and Built-Up Land". According to the DOC, Urban and Built-Up Land is defined as land occupied by structures with a building density of at least 1 unit in 1.5 acres, or approximately six structures to a 10-acre parcel. Examples of land use with this designation include residential, institutional, commercial, and other developed purposes. The Project is not in conflict with a zoning for agricultural use or Williamson Act contract, or conflict with existing forest land zoned for Timberland Production. The Project will not involve the conversion of Farmland to non-agricultural use or result in the loss of forest land; therefore, the project will have **no impact**.

III. Air Quality

Issues		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
Would the Project:					
a.	Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	■	☐
b.	Violate any air quality standard or contribute substantially to an existing or Projected air quality violation?	☐	■	☐	☐
c.	Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	■	☐	☐
d.	Expose sensitive receptors to substantial pollutant concentrations?	☐	■	☐	☐
e.	Create objectionable odors affecting a substantial number of people?	☐	☐	☐	■

The proposed Project site is located in the City of Lodi in San Joaquin County, which is within the jurisdictional boundaries of the San Joaquin Valley Air Pollution Control District (SJVAPCD). The San Joaquin Valley's relatively flat topography surrounded by elevated terrain and its meteorology provide ideal conditions for trapping air pollution and producing harmful levels of air pollutants, such as ozone and particulate matter. Elevated temperatures, cloudless days, low precipitation levels, and light winds during the summer in the Valley are favorable to high ozone levels. Inversion layers in the atmosphere during the winter months can also trap emissions of directly emitted $PM_{2.5}$ (particulate matter that is 2.5 microns or less in diameter) and $PM_{2.5}$ precursors (such as NOx and sulfur dioxide (SO2)) within the Valley for several days, accumulating to unhealthy levels.

a) **Less Than Significant Impact.** The proposed Project site is located within the jurisdictional boundaries of the SJVAPCD. At the federal level, the jurisdictional area of the SJVAPCD is designated as extreme nonattainment for the 8-hour ozone standard, nonattainment for $PM_{2.5}$, and attainment or unclassified for all other criteria pollutants. At the State level, the area is designated as severe nonattainment for the one-hour ozone standard, and nonattainment for the 8-hour ozone, PM_{10}, and $PM_{2.5}$ standards. The area is designated attainment or unclassified for all other State standards. Due to the nonattainment designations, the SJVAPCD has developed plans to attain the State and federal standards for ozone and particulate matter. The plans include the *2013 Plan for the Revoked 1-Hour Ozone Standard*, the *2007 Ozone Plan*, the *2007 PM_{10} Maintenance Plan and Request for Redesignation*, the *2008 $PM_{2.5}$ Plan*, and the *2012 $PM_{2.5}$ Plan*.

The SJVAPCD's recommended thresholds of significant impact are a major component of the SJVAPCD's air quality plans. According to the SJVAPCD, projects with emissions should be compared to the thresholds of significance for criteria pollutants in order to determine potential conflict with or obstruction of the applicable air quality plan. As detailed below, in Section III 3(b, c), the proposed Project would produce temporary emissions of criteria pollutants that will not surpass the applicable thresholds of significance listed in **Table 1**. Therefore, the proposed Project would not be considered in conflict with or obstruct implementation of the applicable air quality plan.

Table A-1. SJVAPCD Thresholds of Significance

Pollutant	Construction Emissions (tons/yr)	Operational Emissions (tons/yr)
ROG	10	10
NO_X	10	10
CO	100	100
SO_X	27	27
PM_{10}	15	15
$PM_{2.5}$	15	15
Source: SJVAPCD, March 2015.		

b-c) **Less Than Significant Impact with Mitigation Incorporated.** The proposed Project site is located within the jurisdictional boundaries of the SJVAPCD. According to SJVAPCD, the procedure for assessing construction and operation emission impacts must be analyzed using the newer CalEEMod 2016 impact calculator. A CalEEMod analysis was conducted by Petralogix Engineering, Inc (Petralogix, 2018) using the following project characteristics: High School Land Use, 80,000 square feet, and Parking Lot Land Use, 4.22 acres; Climate Zone 2, 2.7 m/s Wind Speed, 51 days Precipitation Frequency, and Statewide Average Utility Company. Where project-specific parameters are unknown, the default values in CalEEMod are used as they provide a conservative estimate of emissions.

Typically, construction and operation of a project generates emissions of various air pollutants, including criteria pollutants such as carbon monoxide (CO), ozone precursors such as nitrous oxides (NO_X), reactive organic gases (ROG) or Volatile Organic Compounds (VOC), particulate matter 10 (PM_{10}) and particulate matter 2.5 ($PM_{2.5}$), as well as sulfur oxides (SO_X). For example, typical emission sources during construction include equipment exhaust, dust from wind erosion, earth moving, demolition, excavation and other earthmoving activities, and vehicle movements.

To assist in evaluating impacts of project-specific air quality emissions, the SJVAPCD has adopted thresholds of significance for criteria pollutant emissions, expressed in units of tons per year (tons/yr), as presented in **Table A-1**.

ASSESSMENTS AND FINDINGS

Long Term Operational Emissions. Long-term operational impacts to air quality are greatly determined by land uses and vehicle travel associated with these uses. The amount of long-term emissions that generally result from a project such as a school is largely based on the number of new vehicle trips to the school site as a result of the project. In the case of the proposed Project, there should be essentially no significant changes in vehicle patterns to the site, since the proposed Projects new buildings construction and parking lot improvements serve to accommodate current student and faculty. Although the new planned northwestern parking lot is approximately the same size as the northeastern parking lot it will be replacing, the northwestern parking lot is considered new parking for conservative measures. The proposed Project includes the removal of approximately 56,000 square feet of current "permanent" classroom space, 36,000 square feet of portable classroom space, and 16,500 square feet of Maintenance & Operations Facility buildings, or a total removal of approximately 108,500 square feet of older, less efficient structures. The new administrative building addition and new classrooms are planned for a total of 80,000 square feet; therefore, there will approximately 28,500 less square-feet of long-term operational emissions resulting from the proposed Project. The California Emissions Estimator Model (CalEEMod) was used to estimate the projects long term operational emissions using the proposed 80,000 square feet of new construction, and is considered a highly conservative result, since the Project will eliminate approximately 108,500 square feet of older, less efficient structures. Detailed CalEEMod results are shown in **Appendix B**, while a summary of the long-term operation project emissions is presented in the table below:

Table A-2. Estimated Operational Air Pollutant Emissions

Pollutant	SJVAPCD Significance Threshold (tons/yr)	Unmitigated Emissions		Mitigated Emissions	
		Total (tons/yr)	Total (lbs/day)	Total (tons/yr)	Total (lbs/day)
ROG	10	0.629	3.45	0.6029	3.30
NO_X	10	1.74	9.53	1.71	9.40
CO	100	2.64	14.47	2.58	14.14
SO_X	27	0.0108	0.0592	0.0105	0.0575
PM_{10}	15	0.8058	4.4153	0.7806	4.2773
$PM_{2.5}$	15	0.2241	1.2279	0.2172	1.1901
Source: SJVAPCD, March 2015.					

The proposed Project is planned for operation beginning in August 2021. The first full operational year for CalEEMod is 2022. All of the operational emissions (Table A-2) are well below the SJVAPCD Thresholds of Significance. Based on the results, we do not expect a cumulative significant impact for CO. A cumulative impact does not already exist in this region and both the unmitigated and mitigated CO emissions (Table A-2) would not result in localized CO concentration above the SJVAPCD thresholds. Additionally, CO is created by the combustion of fossil fuels by vehicles – this project is not anticipated to increase traffic, and as discussed above, the project is not intended to facilitate future growth. In addition, the extent of "new" parking lot space input in the land use characteristics of CalEEMod was input as a conservative measure, as a significant portion of the new parking lot space is not new. The current parking lot spaces total 547 and after implementation of the proposed

Project there will be an estimated 580 parking space – only a slight increase. Operational emissions "mitigations" include using low VOC paint, low VOC cleaning supplies, low-flow bathroom fixtures, and water efficient irrigation systems. The operational period emissions for the project (Appendix A) are all below the thresholds of significance and are considered less than significant with mitigation.

Project emissions would be short-term, (approximately 15 months), as a result of construction activities, as discussed below.

Short Term, Construction Phase Emissions. Short-term construction impacts to air include the emissions related to construction workers accessing the site, emissions from construction equipment, demolition, and grading, as well as emissions related to the application of architectural coatings.

CalEEMod accounted for these construction project characteristics (Appendix A) during the analysis. Short-term emissions for this project are considered to be related to the construction phase of the project. The construction phase of the project is estimated to begin in April 2020 and continue through July 2021, or approximately 15 months. Of the many emissions generated during this type of construction, however, PM_{10} is the pollutant of greatest concern. PM_{10} emitted throughout the duration of a construction project can vary greatly, contingent on the level of activity, the specific operations, the equipment utilized, local soil, weather conditions and other factors, making quantification difficult. The SJVAPCD has adopted a set of PM_{10} Fugitive Dust Rules, collectively called Regulation VIII. Several components of Regulation VIII specifically address fugitive dust generated by construction related activities. Detailed CalEEMod results are shown in Appendix B of this document, while a summary of the proposed Projects results for construction emissions are presented in the table below.

Table A-3. Estimated Construction Air Pollutant Emissions

Pollutant	SJVAPCD Significance Threshold (tons/yr)	Unmitigated Emissions		Mitigated Emissions	
		Total (tons/yr)	Total (lbs/day)	Total (tons/yr)	Total (lbs/day)
ROG	10	0.7180	5.26	0.6591	4.83
NO_X	10	2.6937	19.73	1.969	14.42
CO	100	2.0569	15.0689	2.1981	16.10
SO_X	27	0.00464	0.03399	0.00464	0.03399
PM_{10}	15	0.4177	3.0601	0.1927	1.4117
$PM_{2.5}$	15	0.2314	1.6952	0.0839	0.6147
Source: SJVAPCD, March 2015.					

The mitigated and unmitigated emissions are all well below the SJVAPCD Thresholds of Significance (Table A-3). Based on the highest estimated emissions, evaluated per the SJVAPCD Thresholds of Significance, and the implementation of the following **Mitigation Measure Air 1**, which requires appropriate permitting with the SJVAPCD prior to construction, **Mitigation Measure Air 2**, which incorporates Regulation VIII measures, **Mitigation Measure Air 3**, which incorporates District Rule 4641, and the implementation **Mitigation Measure Air 4**, which incorporates District Rule 4002 (National Emission

Standards for Hazardous Air Pollutants), the project Construction impacts to air quality will be **less than significant with mitigation**.

Air Quality Mitigation 1

The Lodi Unified School District shall not begin construction activities until first securing appropriate permits from the San Joaquin Valley Air Control District.

Air Quality Mitigation 2: Construction of the proposed Project shall comply with all the applicable regulations specified in the San Joaquin Valley Air Pollution Control District Regulation VIII (Fugitive Dust Rules). The following procedures will be adhered to by the construction contractor(s) in accordance with Regulation VIII practices:

- Visible Dust Emissions (VDE) from construction, demolition, excavation or other earthmoving activities related to the Project shall be limited to 20% opacity or less, as defined in Rule 8011.
- Pre-water all land clearing, grubbing, scraping, excavation, land leveling, grading, cut and fill, and phase earthmoving.
- Apply water, chemical/organic stabilizer/suppressant, or vegetative ground cover to all disturbed areas, including unpaved roads.
- Restrict vehicular access to the disturbance area during periods of inactivity.
- Apply water or chemical/organic stabilizers/suppressants, construct wind barriers and/or cover exposed potentially dust-generating materials.
- When materials are transported off-site, stabilize and cover all materials to be transported and maintain six inches of freeboard (i.e., minimum vertical distance between the top of the load and the top of the trailer) space from the top of the container.
- Remove carryout and trackout of soil materials on a daily basis unless it extends more than 50 feet from site; carryout and trackout extending more than 50 feet from the site shall be removed immediately. The use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions. Use of blower devices is expressly forbidden. If the Project would involve more than 150 construction vehicle trips per day onto the public street, additional restrictions specified in Section 5.8 of Rule 8041 shall apply.
- Traffic speeds on unpaved roads shall be limited to 15 mph.

- During construction, all earth moving activities shall cease during periods of high winds (i.e., greater than 30 mph). To assure compliance with this measure, grading activities are subject to periodic inspections by LUSD staff.
- Construction equipment shall be kept in proper operating condition, including proper engine tuning and exhaust control systems.
- Areas following clearing, grubbing and/or grading shall receive appropriate BMP treatments (e.g., re-vegetation, mulching, covering with tarps, etc.) to prevent fugitive dust generation.

- All exposed soil or material stockpiles that will not be used within 3 days shall be enclosed, covered, or watered twice daily, or shall be stabilized with approved nontoxic chemical soil binders at a rate to be determined by the on-site construction supervisor.
- Unpaved access roads shall be stabilized via frequent watering, non-toxic chemical stabilization, temporary paving, or equivalent measures at a rate to be determined by the on-site construction supervisor.
- Trucks transporting materials to and from the site shall allow for at least two feet of freeboard. Alternatively, trucks transporting materials shall be covered.
- Where visible soil material is tracked onto adjacent public paved roads, the paved roads shall be swept, and debris shall be returned to the construction site or transported off site for disposal.
- Wheel washers, dirt knock-off grates/mats, or equivalent measures shall be installed within the construction site where vehicles exit unpaved roads onto paved roads.
- Diesel powered construction equipment shall be maintained in accordance with manufacturer's requirements and shall be retrofitted with diesel particulate filters where available and practicable.
- Heavy duty diesel trucks and gasoline powered equipment shall be turned off if idling is anticipated to last for more than 5 minutes.
- Where feasible, the construction contractor shall use alternatively fueled construction equipment, such as electric or natural gas-powered equipment or biofuel.
- Heavy construction equipment shall use low NOx diesel fuel to the extent that it is readily available at the time of construction.
- The construction contractor shall maintain signage along the construction perimeter with the name and telephone number of the individual in charge of implementing the construction emissions mitigation plan, and with the telephone number of the SJVAPCD's complaint line. The contractor's representative shall maintain a log of any public complaints and corrective actions taken to resolve complaints.
- During grading and site preparation activities, exposed soil areas shall be stabilized via frequent watering, non-toxic chemical stabilization, or equivalent measures at a rate to be determined by the on-site construction supervisor.
- During windy days when fugitive dust can be observed leaving the construction site, additional applications of water shall be required at a rate to be determined by the onsite construction supervisor.

Air Quality Mitigation 3

The contractor shall adhere to SJVAPCD District Rule 4641 (*Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations*) to reduce emissions during asphalt paving activities. This rule applies to the manufacture and use of cutback asphalt, slow cure asphalt and emulsified asphalt for paving and maintenance operations.

Air Quality Mitigation 4

The Lodi Unified School District shall adhere to SJVAPCD District Rule 4002 (*National emission Standards for Hazardous Air Pollutants for Asbestos*) intended to protect the public from asbestos exposure, promote compliance by providing accurate information to the regulated community, and provide consistency and direction to all SJVAPCD inspectors involved in enforcing provisions of 40 CFR Part 61 Subpart M – Asbestos, NESHAP (District Rule 4002).

These mitigation measures shall be a note on construction plans.

Based on the highest estimated emissions, evaluated per the SJVAPCD Thresholds of Significance and the implementation of the above Mitigation Measures, project Construction impacts to air quality will be **less than significant with mitigation**.

d) **Less Than Significant with Mitigation Impact.** Sensitive receptors in the vicinity include the existing campus where the proposed Project is located and surrounding residential homes. The project is scheduled to begin April 2021 with construction activities concluding on July 2021, or approximately 15 months, and therefore not considered a long-term "multi-year" project. Since the proposed Project does not exceed any of the threshold criteria established by SJVAPCD and is a short-term construction project, it is not anticipated there would be a change in substantial pollutant concentrations. Although the proposed Project is well below the threshold criteria established by the SJVAPCD, the following Mitigation Measure 5: Selection of equipment during construction will further reduce impact to less than significant with mitigation.

Air Quality Mitigation 5

- All mobile diesel-powered off-road equipment larger than 50 horsepower and operating on the site for more than two days straight shall meet U.S. EPA particulate matter emissions standards for Tier 3 or cleaner engines, with the goal of utilizing Tier 4 Interim or Tier 4 Final whenever possible. The project contractor shall ensure that all off-road, diesel powered equipment used during construction shall be equipped with a Level 3 Diesel Particulate Filter (DPF).
- The number of hours equipment will operate shall be minimal, including the use of idling restrictions.

These mitigation measures shall be a note on construction plans.

e) **No Impact.** The proposed Project does not include any activities that would result in objectionable odors. Therefore, this is no impact.

IV. Greenhouse Gas Emissions

Issues		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
Would the Project:					
a.	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	■	☐	☐
b.	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	■	☐

Climate change is a global problem. Pollutants with localized air quality effects have generally short atmospheric lifetimes (approximately 1 day), greenhouse gas (GHG) emissions persist in the atmosphere for long enough periods of time (1 year to several thousand years) to be dispersed around the globe. The amount of GHGs required to ultimately result in climate change is not precisely known. What is known is that the amount is enormous, and no single project would measurably contribute to noticeable incremental change in the average global temperature. Thus, from the standpoint of CEQA, GHG impacts to global climate change are inherently cumulative.

Prominent GHGs of primary concern from land use development projects include carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). There are other GHGs, such as chlorofluorocarbons, hydrofluorocarbons, and sulfur hexafluoride, however, these are less of a concern since construction and operational activities associated with land use development projects are not likely to generate these in substantial quantities. To quantify GHG, a standard of "CO_2-Equivalent" or CO_2E is used. Carbon dioxide equivalency (CO_2E) refers to the amount of mixed GHGs that would have the same global warming potential when measured over a specified timescale (generally 100 years).

California has adopted a wide variety of regulations aimed at reducing the State's greenhouse gas (GHG) emissions. These regulations include, but are not limited, to the following:

- **Assembly Bill (AB) 32**. The California Global Warming Solutions Act of 2006, requires California to reduce statewide GHG emissions to 1990 levels by 2020. AB 32 directs ARB to develop and implement regulations that reduce statewide GHG emissions.
- **Executive Order S-3-05.** This order establishes GHG emission reduction targets for California and directs the CAL-EPA to coordinate oversight efforts. The targets, which were established by Governor Schwarzenegger, call for a reduction of GHG emissions to 2000 levels by 2010; a reduction of GHG emissions to 1990 levels by 2020; and a reduction of GHG emissions to 80% below 1990 levels by 2050.
- **Senate Bill 375.** Senate Bill (SB) 375 was enacted in order to align regional transportation planning efforts, regional GHG reduction targets, and land use and house allocation. SB 75 requires Metropolitan Planning Organizations (MPOs) to adopt a Sustainable Communities Strategy (SCS) or Alternative Planning Strategy (APS), which will prescribe land use allocation in the MPOs Regional Transportation Plan.

- **Executive Order B-30-15.** This order requires that greenhouse gas emissions in California are reduced by 40 percent below 1990 levels by 2030, and below 1990 levels by 2050.

The San Joaquin Valley Air Pollution Control District has adopted **Rule 9510 – Indirect Source Review (ISR)** in order to:

- Fulfill the District's emission reduction commitments in the PM10 and Ozone Attainment Plans:
- To achieve emission reductions from the construction and use of development projects through design features and on-site measures; and
- To provide a mechanism for reducing emissions from the construction of and use of development projects through off-site measures.

Rule 9510 – Indirect Source Review applies to any applicant that seeks to gain a final discretionary approval for a development project, or any portion thereof, which upon full build-out will include any of the following:

- 50 residential units;
- 2,000 square feet of commercial space;
- 25,000 square feet of light industrial space;
- 100,000 square feet of heavy industrial space;
- 20,000 square feet of medical office space;
- 39,000 square feet of general office space;
- 9,000 square feet of educational space;
- 10,000 square feet of government space;
- 20,000 square feet of recreational space; or
- 9,000 square feet of space not identified above.

a) **Less Than Significant Impact.** The CalEEMod model estimated the construction and operational emissions anticipated for the proposed Project (see Appendix A). Based on the CalEEMod results, the proposed Project construction GHG emissions will generate approximately 415.2009 metric tons per year of CO_2 equivalent. Neither the SJVAPCD or the State has established a threshold of significance for GHG emissions from construction activities, however, the construction emissions will be short-term (approximately 15 months) and cease once completed.

The Project operational emissions would be approximately 1,371 MT of CO_2 equivalent unmitigated and 1,340 MT of CO_2 equivalent for mitigated emissions, or a 2.29 percent reduction in GHG. This is below the goals set forth in ARB's *Climate Change Scoping Plan* (Scoping Plan). The Scoping Plan contains the primary strategies California will implement to achieve a reduction of 169 MMT CO2e, or approximately 28% from the State's projected 2020 emission levels. In the Scoping Plan, ARB encourages local governments to adopt a reduction goal for municipal operations emissions and move toward establishing similar goals for community emissions that parallel the State commitment to reduce GHGs. The Scoping Plan recommends that local governments consider adopting a goal of 15% below current emissions levels to assist the State in implementing AB 32.

As previously discussed, the proposed Project's operational GHG emissions are reduced by 2.29 percent, which is below the 15 percent goal the Scoping Plan recommends for local

governments. It should be noted however, that the Project consists of removing older, less efficient buildings and energy infrastructure associated with the current campus, which includes the demolition/replacement of approximately 72,500 square feet of classroom and Maintenance & Operations building space built in the late 1950's, as well as the removal of 36,000 square feet of portable classrooms which are less efficient than the 80,000 square feet new construction accounted for in the long-term operation emissions calculations.

According to San Joaquin Valley Air Pollution Control District (District), if a proposed Project exceeds 9,000 square feet of educational space, the district concludes that the proposed Project would be subject to District Rule 9510 (Indirect Source Review). The proposed Project will actually be reducing the square footage of structures on site by approximately 28,500 square feet, therefore this should be considered non-applicable to the project. The Operational Emissions provided are extremely conservative, given there will be a total reduction in building square-footage located on the site from 108,500 square feet currently, to approximately 80,000 square feet planned for replacement; there will be 28,500 square feet less of operational emissions, with more efficient structures replacing the older ones. Furthermore, in terms of operational emissions, ARB staff allows small projects to be considered insignificant if a project consists of a quantitative threshold of 7,000 metric tons of carbon dioxide equivalent per year for operational emissions. There will be a slight reduction of GHG impacts with the implementation of **Mitigation Measure GHG – 1.** Therefore, greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment is considered **less than significant with mitigation**.

Mitigation Measure GHG – 1

- **Eighty trees will be planted post construction.**
- **Three additional bike racks and six lockers will be added post construction.**

b) **Less Than Significant Impact.** According to San Joaquin Valley Air Pollution Control District (District), if a proposed Project exceeds 9,000 square feet of educational space, the district concludes that the proposed Project would be subject to District Rule 9510 (Indirect Source Review). However, the proposed Project will in fact be *reducing* the square footage of structures on site by approximately 28,500 square feet, therefore this should be considered non-applicable to the project. Additionally, the proposed project is replacing older, less efficient buildings which is consistent with the State's GHG reductions. Land use will remain the same for the site, and no additional long-term change to increased traffic or growth pertain to the proposed Project. The new administration building addition and new classroom buildings are designed to meet current energy efficiency standards, which will further reduce GHG emissions. The project would be subject to all applicable permit and planning requirements in place or adopted by the District, San Joaquin County, and the City of Lodi. No significant conflict with GHG reduction policies is anticipated, therefore, there is a **less than significant impact**.

V. Biological Resources

Issues		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
Would the proposal:					
a.	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	■	☐	☐
b.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	■
c.	Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	■
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 wildlife nursery sites?	☐	☐	☐	■
e.	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	■	☐	☐
f.	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	■

Moore Biological Consultants prepared a biological assessment (included in Appendix B) of the proposed Project site and how the project could affect the environment within and adjacent to the sites. Their report includes biological assessment for potentially regulated Waters of the U.S. and wetlands, Federal and State special-status species, or potentially suitable habitat for species within the project site, in accordance with the Federal Endangered Species Act (FESA), the Clean Water Act (CWA), the Rivers and Harbors Act, the Migratory Bird Species Act (MBTA), the California Endangered Species Act (CESA), the California Environmental Quality Act (CEQA), the Fish and Game Code of California, the Porter-Cologne Water Quality Control Act, and the California Native Plant Protection Act. The results of their assessment are hereby incorporated by reference (Moore Biological Consultants, 2018).

Moore Biological Consultants utilized the California National Diversity Database (CNDDB) to identify wildlife and plant species that have been previously documented in the project vicinity or that have the potential to occur based on suitable habitat and geographical distribution. They also conducted a field survey of the proposed Project site, which included an assessment of

potentially jurisdictional waters of the U.S., special-status species, and suitable habitat for special-status species.

a) **Less Than Significant Impact with Mitigation Incorporated.** The site project is areas in the northern and western portions of the campus which are currently developed land that is biologically unremarkable. Development of the proposed Project will result in the removal of approximately 9 large ornamental trees (defined as greater than 20 feet in height) and 17 small ornamental trees (defined as less than 20 feet in height) and some shrubs, which from a wildlife habitat perspective is less than significant impact. The site has been disturbed by development and does not provide suitable habitat for special status plants (Moore Biological Consultants, 2018). The Project would not significantly modify, either directly or indirectly, habitats of any species identified as candidate, sensitive, or special status. Special-status species are plants and animals that are legally protected under the CESA, FESA, or other regulations.

   The Federal Endangered Species Act (FESA) of 1973 (16 U.S.C. 1531-1543) and subsequent amendments provide guidance for the conservation of endangered and threatened species and the ecosystems upon which they depend. Section 7 of FESA requires Federal agencies to ensure that the actions they authorize, fund, or carry out are not likely to jeopardize the continued existence of threatened or endangered species or result in the destruction or adverse modification of critical habitat for these species. Critical habitat is areas mapped by United States Fish and Wildlife Service (USFWS) as being critical to maintain and/or manage in a relatively natural state for the recovery of a listed species. The site is not within designated critical habitat for any federally listed species.

   The California Endangered Species Act (CESA) (Fish and Game Code 2050 et seq.) establishes the policy of the State to conserve, protect, restore, and enhance threatened or endangered species and their habitats. CESA mandates that State agencies should not approve projects that would jeopardize the continued existence of threatened or endangered species, if reasonable and prudent alternatives are available that would avoid jeopardy. The CDFW is required to issue a written finding indicating if a project would jeopardize threatened or endangered species and specifying reasonable and prudent alternatives that would avoid jeopardy.

   CEQA Guidelines Section 15380 provides that a species not listed under the FESA or CESA may be considered rare or endangered under specific criteria. These criteria have been modeled after the definitions in FESA and CESA.

   While the project site may have provided habitat for special-status species at some point in the past, development has substantially modified natural habitats in the greater project vicinity, which includes those within the site. Of the wildlife species identified in the CNDDB search, Swainson's hawk is the only species that has any potential to occur in the project site on more than a transitory or very occasional basis. The Swainson's hawk is a migratory hawk listed by the State of California as a Threatened species. The Migratory Bird Treaty Act and fish and Game Code of California protect Swainson's hawks year-round as well as their nests during nesting season (March 1 through September 15). The CNDDB contains a record of a pair of Swainson's hawk nesting approximately 0.5 miles southeast of the site and several additional records within several miles of the site. Due to the location of the site being in the middle of a busy campus, it is unlikely the Swainson's hawks use on-site habitats on more than a very occasional basis. However, Swainson's hawk may fly over the

site on occasion and could potentially nest in trees in or near the site. Swainson's hawk could be disturbed by noise if they nested in or near the project site during construction (Moore Biological Consultants, 2018).

Implementation of the following mitigation measure would reduce the above-identified impacts to biological resources to a less-than-significant level.

Biological Resources Mitigation Measure 1 - Preconstruction Survey Requirements
A qualified biologist shall conduct a preconstruction survey for nesting Swainson's hawks within 0.25 miles of the project site if construction commences between March 1 and September 15. If active nests are found, a qualified biologist should determine the need (if any) for temporal restrictions on construction. This determination should be pursuant to criteria set forth by CDFW (Moore Biological Consultants, 2018).

On-site trees, shrubs, and grasslands may be used by nesting birds protected by the Migratory Bird Treaty Act of 1918 and Fish and Game Code of California. A qualified biologist shall conduct a preconstruction nesting bird survey if vegetation removal and/or project construction occurs between February 1 and August 31. If active nests are found within the survey area, vegetation removal and/or project construction should be delayed until a qualified biologist determines nesting is complete (Moore Biological Consultants, 2018).

b) **No Impact.** The proposed Project will not have substantial adverse impacts on sensitive or regulated habitat since the Project site itself is devoid of native riparian vegetation or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS (Moore Biological Consultants, 2018). Therefore, there is no impact.

c) **No Impact.** The project site area consists entirely of built-up or landscaped areas that are highly disturbed. There are no potentially jurisdictional Waters of the U.S. or wetlands in the site. Specifically, there was no observed permanent or intermittent drainages, vernal pools, seasonal wetlands, marshes, ponds, lakes, or riparian wetlands of any variety within the site (Moore Biological Consultants, 2018). Therefore, there is no impact.

d) **No Impact.** The project site is not located on or adjacent to a waterway. The proposed Project will not interfere substantially with the movement of any other 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. Therefore, this is no impact.

e) **Less Than Significant Impact with Mitigation Incorporated.** The proposed Project will result in the removal of some ornamental trees and shrubs; there is an estimated 9 large trees (upward of 20 feet in height) and 17 smaller trees (less than 20 feet in height) planned for removal. City Municipal Code Chapter 12.04.360 addresses permit requirements for the planting or removal of trees or shrubs located within the right-of-way of a public street. The project does not consist of planting or removal of trees within the City's right-of-way, therefore this is a **less than significant impact**.

Removal of trees may affect nesting birds protected by the federal Migratory Bird Treaty. In order to reduce any potential impacts to nesting migratory birds to a less than significant level, Biological Resources Mitigation Measure – 1 is required. With Biological Resources Mitigation Measure – 1 incorporated, this is a **less than significant impact**.

f) **No Impact.** The City of Lodi has adopted the San Joaquin County Multispecies Habitat Conservation and Open Space Plan (SJMSCP) and the Project's participation in the plan is required by the City. In an effort to protect sensitive and threatened species throughout San Joaquin County, SJCOG prepared the San Joaquin County Multispecies Habitat Conservation and Open Space Plan (SJMSCP). The purpose of the SJMSCP is to provide for the long-term management of plant, fish and wildlife species, especially those that are currently listed or may be listed in the future under the FESA or CESA, and to provide and maintain multiple-use open space that contributes to the quality of life of residents of San Joaquin County.

The project is subject to the SJMSCP. The project is urban and therefore "fee exempt", however the project will require a biological site visit for the nesting trees near or onsite prior to construction. The project must contact the SJMSCP approximately 30 days prior to ground disturbance activities. The proposed Project will comply with the SJMSCP, and no impact would occur.

VI. Cultural Resources

Issues		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
	Would the Project:				
a.	Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	☐	■
b.	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	■	☐	☐
c.	Directly or indirectly destroy a unique paleontological resource or unique geologic feature?	☐	■	☐	☐
d.	Disturb any human remains, including those interred outside of formal cemeteries.	☐	■	☐	☐
e.	Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074?	☐	■	☐	☐

a) **Less than Significant.** On July 25, 2018, Petralogix Engineering, Inc. (Petralogix), sent a letter describing the project with maps depicting the project area to the San Joaquin County Historical Society. The letter requested any information or concerns about cultural resources in the project area; no response to consultation attempt has been received to date. In addition, a search of the National Registers Information System and Office of Historic Preservation list of California Historical Landmarks revealed no finds within the vicinity of the project. This is a less than significant impact.

b) **Less than Significant with Mitigation Incorporated.** A significant impact would occur if the Project causes a substantial adverse change to an archaeological resource through demolition, construction, conversion, rehabilitation, relocation, or alteration. According to the Lodi General Plan, Conservation Element, Cultural Resources, most prehistoric settlements within and surrounding the Planning Area were focused along the Mokelumne River and Bear Creek (southeast of Lodi). Although some areas have greater sensitivity than others for the presence of prehistoric or historic archaeological resources, it is possible to encounter archaeological deposits during ground-disturbing activities in almost any location. Therefore, there is a low to moderate potential that prehistoric resources and/or historic cultural resources could be encountered during ground-disturbance activities. Implementation of **Mitigation Measure CR-1** would provide the necessary measure(s) to reduce impacts to a less than significant with mitigation incorporated.

In the event that archaeological resources are observed during Project construction-related activities, **Mitigation Measure CR-1** is in place to reduce impacts to a less than significant level. Therefore, the impact on archaeological resources is considered less than significant with mitigation incorporated.

Cultural Resources Mitigation Measure CR-1

If prehistoric or historic-period archaeological deposits are discovered during Project activities, all work within 50 feet of the discovery should be redirected and the Lodi Unified School District (or its representative) shall consult with a qualitied archaeologist to assess the situation, consult with agencies as appropriate, and make recommendations regarding the treatment of the discovery. Impacts to archaeological deposits should be avoided by Project activities, but if such impacts cannot be avoided, the deposits should be evaluated for their California Register eligibility. If the deposits are not California Register–eligible, no further protection of the finds is necessary. If the deposits are California Register–eligible, they should be protected from Project-related impacts, or such impacts should be mitigated. Mitigation may consist of, but is not necessarily limited to, systematic recovery and analysis of archaeological deposits, recording the resource, preparation of a report of findings, and accessioning recovered archaeological materials at an appropriate curation facility. Public educational outreach may also be appropriate.

c) **Less than Significant with Mitigation Incorporated.** No evidence of a unique paleontological resource or unique geologic feature was revealed per the investigations discussed above. Implementation of **Mitigation Measure CR-2** would ensure that any previously unidentified paleontological resources encountered during ground disturbing activities for the proposed Project would be managed in accordance with applicable regulations. Therefore, the impact on paleontological resources is considered less than significant with mitigation incorporated.

Cultural Resources Mitigation Measure 2

Should paleontological resources be identified on the Project site during any ground disturbing activities related to the Project, all 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.

d) **Less than Significant with Mitigation Incorporated.** A significant impact may occur if grading or excavation activities associated with the proposed Project would disturb previously interred human remains. Implementation of **Mitigation Measure CR-3** would ensure that human remains encountered during Project activities are treated in a manner consistent with state law and reduce impacts to human remains to a less than significant level as required by CEQA. This would occur through the respectful coordination with descendant communities to ensure that the traditional and cultural values of said community are incorporated in the decision-making process concerning the disposition of human remains that cannot be avoided. The implementation of these mitigation measures would reduce this potential impact to a less than significant level.

Cultural Resources Mitigation Measure 3

Any human remains encountered during Project ground-disturbing activities should be treated in accordance with California Health and Safety Co de Section 7050.5. The lead

agency should inform its contractor(s) of the sensitivity of the Direct Area of Potential Effect for human remains and verify that the following directive has been included in the appropriate contract documents:

> If human remains are encountered during Project activities, the Project shall comply with the requirements of California Health and Safety Code Section 7050.5. There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the county coroner has determined the manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation or to his or her authorized representative. At the same time, an archaeologist shall be contacted to assess the situation and consult with agencies as appropriate. Project personnel/ construction workers shall not collect or move any human remains and associated materials. If the human remains are of Native American origin, the coroner must notify the Native American Heritage Commission within 24 hours of this identification. The Native American Heritage Commission will identify a Native American Most Likely Descendant to inspect the site and provide recommendations for the proper treatment of the remains and associated grave goods.

e) **Less than Significant with Mitigation Incorporated.** A tribal cultural resource is defined as a site, feature, place, cultural landscape, sacred place or object with cultural value to a California Native American tribe. The Native American Heritage Commission (NAHC) was contacted regarding Sacred Lands File and Native American Contacts List Request on July 25, 2018. The Native American Heritage Commission responded on August 13, 2018, with a list of tribes with traditional lands or cultured places located within the boundaries of San Joaquin County. Under AB 52, lead agencies must evaluate a project's potential impact to a tribal cultural resource. Formal notification and request for consultation letters were mailed to the tribes listed by the Native American Heritage Commission on August 16, 2018.

Rhonda Morningstar, Buena Vista Rancheria of Me-Wuk Indians – In a letter sent via certified mail, the District requested any information that Ms. Morningstar may have regarding tribal cultural resources that may be within the Project Area which could be incorporated into the planning phase. The certified delivered on August 20, 2018. No response to the consultation has been received to date.

Sara Dutschke Setchwaelo, Ione Band of Miwok Indians – In a letter sent via certified mail, the District requested any information that Ms. Dutschke Setchwaelo may have regarding tribal cultural resources that may be within the Project Area which could be incorporated into the planning phase. The certified delivered on August 20, 2018. No response to the consultation has been received to date.

Katherine Erolinda Perez, North Valley Yokuts Tribe – In a letter sent via certified mail, the District requested any information that Ms. Erolinda Perez may have regarding tribal cultural resources that may be within the Project Areas which could be incorporated into the planning phase. The certified delivered on August 20, 2018. No response to the consultation has been received to date.

Gene Whitehouse, United Auburn Indian Community of the Auburn Rancheria – In a letter sent via certified mail, the District requested any information that Mr. Whitehouse may have regarding tribal cultural resources that may be within the Project Areas which could be incorporated into the planning phase. The certified delivered on August 20, 2018. No response to the consultation has been received to date.

Raymond Hitchcock, Wilton Rancheria – In a letter sent via certified mail, the District requested any information that Mr. Hitchcock may have regarding tribal cultural resources that may be within the Project Areas which could be incorporated into the planning phase. The certified delivered on August 20, 2018. A response to the consultation was received via e-mail on August 22, 2018 from Mr. Antonio Ruiz. Mr. Ruiz stated acknowledgement of the letter and communicated the only concern that the Tribe has with the Project is that when ground disturbance occurs, even in areas of existing or prior development, there is a possibility that Native American artifacts and/or human remains may be uncovered. Therefore, the Agency should immediately stop construction and notify Wilton Rancheria and the appropriate Federal and State Agencies.

No cultural resources or unique geologic features were identified within the project area, as discussed in questions a) and b). In the event that Native American remnants are observed during Project construction-related activities, **Mitigation Measures CR-1 and CR-2** are in place to reduce impacts to a less than significant level. Therefore, the impact on Native American resources is considered less than significant with mitigation incorporated.

VII. Geology and Soils

Issues		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
Would the Project:					
a.	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
	i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	■	☐
	ii. Strong seismic ground shaking?	☐	■	☐	☐
	iii. Seismic-related ground failure, including liquefaction?	☐	☐	■	☐
	iv. Landslides?	☐	☐	☐	■
b.	Result in substantial soil erosion, or the loss of topsoil?	☐	☐	■	☐
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?	☐	☐	■	☐
d.	Be located on expansive soils, as defined in Table 18-1-13 of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	■	☐
e.	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	■

Mid Pacific Engineering, Inc. (MPE) completed a *Geologic Hazards and Geotechnical Engineering Report (GER)*, dated August 17, 2018 (included in Appendix C), for the proposed Lodi High School repairs and improvements project report. This *GER* provides geotechnical recommendations for (1) project related earthwork, as well as (2) the design and construction of foundations and floor slabs. The *GER* also presents a comprehensive list of Project related seismic/faulting hazards and site-specific soil conditions. These findings are based on an extensive review of regional seismic literature, as well as the interpretation of in-situ subsurface exploration data, respectively.

a) **Less than Significant with Mitigation Incorporated.**

i. **Less than Significant Impact.** The Project site is located within California's Central Valley, a region of relatively low to moderate seismic activity. Review of *Fault Rupture Hazard Zones in California, Special Publication 42* indicates that the Project site is not located within the mapped trace of any known faults, nor is it listed within a State designated Alquist-Priolo Earthquake Fault Zone (Bryant and Hart, 2007). Thus, the

type and intensity of potential seismic hazards at the Project site depend on distances to the causative faults, as well as the magnitude of each seismic event (MPE, 2018).

The following table contains California Geologic Survey (CGS) Class and B fault systems within 100 km of the Project site, as designated by the *United States Geological Survey (USGS) Earthquake Hazards Program, 2008 National Seismic Hazard Maps-Source Parameters* (USGS, 2008). The identified faults are considered capable of producing earthquakes with moment magnitudes (M_w) of 6.4 or greater.

Table G-1. Faults Influential to the Lodi High School

Fault Name	Maximum Magnitude (M_W)	Distance to Site Miles (km)
Great Valley Fault System (Segment 7)	6.9	30.5 (49.0)
Great Valley Fault System (Segment 5)	6.7	31.3 (50.4)
Greenville Connected	7.0	34.3 (55.2)
Great Valley Fault System (Segment 4b)	6.8	37.2 (59.9)
Mount Diablo Thrust	6.7	40.4 (64.9)
Green Valley Connected	6.8	41.5 (66.8)
Calaveras CN	6.9	45.0 (72.4)
Calaveras CN+CC+CS	7.0	45.0 (72.4)
Calaveras CN+CC	7.0	45.0 (72.4)
Great Valley Fault System (Segment 4a)	6.6	47.2 (76.0)
Great Valley Fault System (Segment 8)	6.8	48.9 (78.7)
West Napa	6.7	52.0 (83.7)
Hayward-Rodgers Creek HS	6.8	53.5 (86.1)
Hayward-Rodgers Creek HN+HS	7.0	53.5 (86.1)
Hayward-Rodgers Creek RC +HN+HS	7.3	53.5 (86.1)
Hunting Creek-Berryessa	7.1	54.0 (86.9)
Hayward-Rodgers Creek HN	6.6	54.7 (88.0)
Hayward-Rodgers Creek RC+HN	7.2	54.7 (88.0)
Calaveras CC	6.4	55.4 (89.2)
Calaveras CC+CS	6.5	55.4 (89.2)
Great Valley Fault System (Segment 3)	7.1	56.2 (90.4)
Ortigalita	7.1	59.6 (95.9)

Given the distance of these faults to the Project site, earthquake hazards are considered to have a **less than significant impact.**

ii. **Less than Significant with Mitigation Incorporated.** In general, strong ground shaking from an earthquake is the cause for most seismic ground shaking damage. Site specific seismic design parameters were considered for the mitigative design of the proposed Project improvements. Seismic design parameters outputs were calculated by a public domain computer program developed by the USGS and were determined in accordance with Section 1613.1 of the California Building Code (CBC;

2016 edition) and ASCE Standard 7 for seismic design. These values assume a stiff soil profile for the Project site, which correlates to CBC Site Classification D. Based on these parameters, the mean peak ground acceleration (PGA_m) for the project site is expected to be 0.333g, a relatively moderate value (MPE, 2018).

Project construction will be required to meet the design standards set forth in the San Joaquin County Ordinance No. 4489, the City of Lodi's *Building Codes and Design Criteria (effective 2017)*, and the seismic design criteria specified within the 2016 CBC.

Based on (1) the required design standards, (2) a site location outside of any designated Alquist-Priolo Earthquake Fault Zone, and (3) moderate PGA_M anticipated for the Project site, ground shaking is considered **less than significant** with incorporated mitigation design.

Geology and Soils Mitigation 1

Standard design and construction techniques will be used to mitigate the potential for damage due to seismically induced strong ground shaking.

Based on (1) the planned mitigation, (2) the project located outside a designated Alquist-Priolo Earthquake Fault Zone, and (3) moderate PGA_M values anticipated for the Project site, ground shaking damage is considered **less than significant** with mitigation.

iii. **Less than Significant Impact.** Liquefaction is a mode of ground failure that results from the generation of excess soil pore-water pressures during earthquake ground shaking, which causes loss of shear strength. This phenomenon generally occurs in areas of high seismicity where groundwater is shallow and soils are loose and granular.

Liquefaction hazards include bearing capacity failure, lateral spreading, and differential settlement of soils below foundations, which can contribute to structural damage or collapse. Strong seismic shaking may also induce cyclic softening of saturated, relatively non-plastic fine-grained soils.

The CGS has designated potential liquefaction zones within California. These zones are considered at-risk of liquefaction related ground failure during seismic events, a designation that is based on mapped surficial deposits and the likely presence of a relatively shallow water table at a given site (CGS SP 118, 1992; revised 2004). The Project site is not located within a designated area of potential liquefaction (MPE, 2018).

MPE encountered groundwater at depths of approximately 30.5 feet and 36.5 feet below the ground surface in the two CPT soundings performed at the project site. Groundwater was not encountered in any of the subsequent soil borings (maximum depth of 26.5 feet below the ground surface). Department of Water Resources (DWR) historical records from 1947 to 2018 indicate that groundwater elevations for the area have fluctuated between 13.0 feet and 48.5 feet below the ground surface (MPE, 2018).

MPE subsequently performed a liquefaction analysis in accordance with 2016 CBC standards, wherein both of the CPT sounding tests for soils at approximately 45 feet

below the ground surface yielded Liquefaction Potential Index (LPI) values of less than 0.55 and a maximum total seismic settlement of less than 0.5 inches for on-site soils. These results suggest that liquefaction hazards for the project site are low for the Project site (Iwasaki et al., 1982).

Based on the data presented, the depth to groundwater, and the dense nature of the underlying strata, the potential for seismically induced liquefaction at this site is considered negligible (MPE, 2018). This is a **less than significant impact.**

iv). **No Impact**. The Project area is located on geographically level terrain (average grade less than five degrees) considered insufficient to produce a landslide. The Project area is not located within an earthquake-induced landslide zone (defined as "an area where previous occurrence of landslide movement, or local topographic, geological, geotechnical and subsurface water conditions indicate a potential for permanent ground displacement") per the reviewed Official Maps of Seismic Hazard Zones provided by the State of California Department of Conservation. As a result, no impacts related to landslides are anticipated.

b) **Less than Significant Impact**. The on-site surface and near-surface soils primarily consist of silty sands which are suitable for use as engineered fill (MPE, 2018). Per MPE's recommendations regarding site preparation, excavation, subgrade preparation and placement of engineered fills for the Project, the subgrade should be excavated to a minimum depth of four feet below the existing or final grade, or below the planned bottom, whichever is deeper. The exposed subgrade should subsequently be scarified to a minimum depth of 12 inches, moisture conditioned and uniformly recompacted to at least 95 percent of the ASTM D1557 maximum dry density. The resulting excavation should be restored to grade with compacted engineered fill, which shall be placed in horizontal lifts exceeding not exceeding six inches in compacted thickness (MPE, 2018). All fill material should be non-expansive and conform to the engineered fill specified per the Modified Proctor Test (ASTM D 1557) as provided in MPE's geotechnical investigation (MPE, 2018). As a normal and standard requirement, the Project would be required to prepare and have approved individual Stormwater Pollution Prevention Plans (SWPPPs) that mandate construction and post-construction water quality provisions, including but not limited to erosion control plans during construction, installation of biofilters and/or mechanical cleansing of stormwater run-off, and similar elements. As a result of these standard engineering measures, the Project would have a less than significant impact on substantial soil erosion and issues resulting from the removal of topsoil during and after the construction process.

c) **Less than Significant Impact**. The Geotechnical Engineering Report performed by MPE for the Lodi High School improvements and repairs project consisted of twelve borings drilled to depths of 15 to 26.5 feet below ground surface (bgs) within the footprint of the proposed Project. The borings generally exposed soils consisting of loose clayey sand overlying medium dense clayey and silty sand. The upper surface materials encountered consisted of 7 feet to 20 feet of loose to dense silty fine sands and clayey fine sands underlain by medium dense poorly graded fine to coarse sands and poorly graded fine sands with silt, which in turn were underlain by silty fine sands, clayey sands and clayey silts to the maximum exploration depths that ranged from 21.5 feet and 26.5 feet bgs.

Soils from the third successively deep stratum were not observed in borings with exploration depths of 20 feet bgs or less. Results of borings are given below:

Table G-2.
General Results of Soil Borings

Stratum	Approximate Depth to Bottom of Stratum	Material Description	Consistency/Density
Surface	2 inches	Asphalt	--
1	7 to 20 feet bgs	Silty Fine Sand to Clayey Fine Sand	Loose to Dense
2	7 to 21.5 feet bgs	Poorly Graded Fine to Coarse Sand to Poorly Graded Fine Sand with Silt	Medium Dense
3	21.5 to 26.5 feet bgs (max depths of exploration)	Silty Fine Sand, Clayey Sand and Clayey Silt	Loose to Dense; Hard

As previously stated, groundwater was observed during MPE's subsurface exploration (maximum depth of 26.5 feet below ground surface) of the at the Project site. It should be noted that future groundwater conditions may change as a result of to rainfall, construction activities, irrigation, or other factors not evident at the time the borings were performed. Therefore, groundwater levels during construction may be higher or lower than the levels indicated during the investigation. For reference, DWR historical records from 1947 to 2018 indicate that groundwater elevations for the area have fluctuated between 13.0 feet and 48.5 feet below the ground surface (MPE, 2018).

As part of the geotechnical investigation for the Project site, MPE performed a liquefaction analysis in accordance with 2016 CBC standards, wherein both of the CPT sounding tests for soils at approximately 45 feet below the ground surface yielded Liquefaction Potential Index (LPI) values of less than 0.55 and a maximum total seismic settlement of less than 0.5 inches for on-site soils. These results suggest that liquefaction hazards for the project site are low for the Project site (Iwasaki et al., 1982).

Based on the data presented, the depth to groundwater and the dense nature of the underlying strata, the potential for seismically induced liquefaction at this site is considered negligible (MPE, 2018); **this is a less than significant impact**.

Based on their observations during subsurface exploration, laboratory testing, and analysis, MPE's opinion is that the planned two-story classroom buildings may be supported on spread foundations that bear on native soils that have been improved by a ground improvement system (i.e. compacted aggregate piers [CAPs]) (MPE, 2018). Additionally, landslide potential in the area is negligible due to the flat topography at the site; this is a **less than significant impact**.

d) **Less than Significant Impact**. Based on the results of their subsurface exploration, laboratory testing and analysis, MPE concluded that special site preparation or foundation design to mitigate expansive soils will not be required for development at the site (MPE, 2018). The results of MPE's subsurface exploration indicated that a major portion of the

onsite surface and near-surface soils consist of silty sands. As indicated in Table 2 above, clayey sands were encountered in two of the borings to depths of approximately 5.0 feet to 8.5 feet below the ground surface. However, laboratory testing of the onsite silty and clayey sands indicated that these soils possess very low expansion potential (MPE, 2018).

Geology and Soils Mitigation 2

Earthwork on the project shall be observed and evaluated by MPE. Earthwork evaluation shall include the observation and testing of engineered fills, subgrade preparation, foundation bearing soils and other geotechnical conditions during the construction of the project. Standard design and construction techniques will then be used to mitigate the potential for damage. The Project will also be subject to applicable engineering and County and City code requirements, which would ensure that the possible effects of unstable soil are minimized. Therefore, the potential impact from expansive soil is considered less than significant with mitigation.

e) **No Impact**. The proposed Project will not utilize a septic system. No significant impact.

VIII. Hazards and Hazardous Materials

Issues		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
Would the Project:					
a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	■	☐	☐
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?	☐	■	☐	☐
c.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	■	☐
d.	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	■	☐	☐
e.	For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard for people residing or working in the Project area?	☐	☐	☐	■
f.	For a Project within the vicinity of a private airstrip, would the Project result in a safety hazard for people residing or working in the Project area?	☐	☐	☐	■
g.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	■
h.	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	■

The Lodi Unified School District is proposing school repair and improvements. Improvements include demolition of existing maintenance and operations buildings, the removal of existing modular classrooms, and new construction of one and two-story classroom buildings which will include a minimum of fifty-two (52) classrooms and six (6) science labs. The proposed Project also includes improvement upgrades to site facilities, relocation of the northeastern parking lot to the northwest, an additional student parking lot north of the track, new fencing and exterior lighting. The proposed school repair and improvements are intended to service

the current student body and faculty attending Lodi High School and are not intended to facilitate growth in enrollment and/or employment.

a,b) **Less than Significant Impact with Mitigation Incorporated.** The project does not produce hazardous material. Any hazardous substances, such as those used for routine cleaning, upkeep of surrounding grounds, and maintenance, may be stored onsite, labeled, and within designated areas on the Lodi High School campus. The proposed school repair and improvements would not involve the routine use, transport, or disposal of hazardous material(s); however, there is the potential accidental release of hazardous material through possible spills associated with the construction equipment, such as oil and/or hydraulic fluid, during the construction phase of the project. With the implementation of **Mitigation Measure Hazards and Hazardous Materials 1**, which requires standard spill prevention measures and a procedure for spill response if one does occur, the projects potential to create a significant hazard to the public or the environment involving transport, use, disposal, or accidental release of hazardous materials, the impact is less than significant with mitigation incorporated.

Hazards and Hazardous Materials Mitigation 1

Spill Prevention and Control Measures will be implemented and include the following:

- Any fuel products, lubricating fluids, grease, or other products and/or waste released from the Contractor(s) vehicles, equipment, or operations, shall be collected and disposed of immediately, and in accordance with State, Federal, and local laws.
- Spill clean-up materials will be stored near potential spill areas (such as vehicle and equipment staging areas).
- Spill kits will include sorbent material (such as pads designed for oil and gas), socks and/or pads to prevent spread of hazardous material, and containers for storing and proper disposal.
- Employees and contractor(s) will be trained on proper hazardous spill clean-up practices.

c) **Less Than Significant Impact**. **Air Emission Facilities** —California Department of Education Code Section 17213(b); Public Resources Code Section 21151.8(a)(2); and the California Code of Regulations, Title 5, Section 14011(i) requires a school district, in consultation with the local air pollution control district, to identify facilities within one-quarter mile of the proposed site that might reasonably be anticipated to emit hazardous air emissions or handle hazardous or acutely hazardous materials and substances of waste. The San Joaquin Valley Air Pollution District (SJVAPD) is responsible for providing written notification of any findings to the school district.

A letter was submitted to the SJVAPD requesting the identification and review of all sites potentially emitting hazardous air emissions within one-quarter mile of the proposed Project site. Three locations were identified by Will Worthley of SJVAPD via email correspondence received on August 8, 2018. The email identified three sites. Two sites consist of gas dispensing facility permits for 236 N Ham Lane and 1225 W Lockeford Street. The third site permit is for the City of Lodi (Water Well #9) diesel-fired emergency generator. These facilities are considered **less than significant**.

d) **Less Than Significant Impact with Mitigation Incorporated**. The project takes place within the boundary of the Lodi High School campus grounds. The project is not included in any hazardous materials sites compiled pursuant to Government Code Section 65962.5. In addition, two records requests was submitted with the San Joaquin County Environmental Health Department (EMD) on June 21, 2018, and July 30, 2018 requesting Hazardous Waste/Hazardous Materials, Underground Tank (monitoring/removal/LOP), Above Ground Tank, Spill/Release Response, Solid Waste Facility/Vehicle, Food Facility, Pool/Spa, and Land Use Application Sites information for the Lodi High School address (3 S Pacific Avenue) and Maintenance & Operations parcel (31 N Pacific Avenue) both located within the boundary of the proposed Project. The Department of Toxic Substances Control ENVIROSTOR website and the State Water Resources Control Board GeoTracker website were additionally reviewed for the site and adjacent parcels, in an attempt to identify hazardous materials that would create a significant hazard to the public or the environment. In addition, a Phase I Environmental Site Assessment report performed by Petralogix Engineering, Inc., dated October 9, 2018 engaged the services of Environmental Data Resources, Inc. (EDR) of Milford, Connecticut; EDR provided Petralogix a list and profile of the recorded sites within the project area that have been identified by regulatory agencies of significance. Select findings obtained from the San Joaquin County Environmental Health Department and EDR results summarized in the Phase I are discussed below. The Phase I is available for review as Appendix D.

The available SJCEHD and EDR records reviewed indicate the Lodi High School currently qualifies as a small quantity hazardous waste generator, with a valid operating permit, with no current violations on record. The subject property (31 N Pacific Avenue) is listed on the HIST UST database, with the facility type reported as a Gas Station. There are three historic USTs listed. Tank 001, 1,000-gallon Diesel, installed 1958; Tank 002, 10,000-gallon Diesel, installed in 1958; Tank 003, 10,000-gallon Regular, installed in 1978. The three USTs are listed as “inactive” on the CA FID UST databases. A review of San Joaquin County Environmental Health records for the subject property indicate the removal of the three USTs occurred on June 17, 1987; based on records indicating EHD was onsite for inspection during removal, the USTs appeared intact at time of removal, soil samples were obtained for each location and analysis results indicated no soil was impacted, in conjunction with a “Permanently Closed Site” form from the water Resource Control Board, the former USTs are not considered a significant hazard to the public or environment.

EHD records indicate the subject property was the site of a storage container fire that resulted in burnt waste and liquid from the fire suppression that contained “janitorial chemicals”. A small amount of liquid entered a storm drain north of the fire and a portion of the soccer field adjacent to the fire was impacted. Ramos Environmental was onsite and handled the clean-up of the waste, container, and storm drain. Soil samples were taken from the impacted soccer field area and analyzed for pH, chlorides, ammonia, and BTEX. San Joaquin County Environmental Health Department witnessed the clean-up, reviewed the soil sample results, and issued a “No Further Action” on this clean-up on January 3, 2018. The container fire is not considered a significant hazard to the public or the environment.

EHD records report a Hazardous Waste Program Inspection Return to Compliance form dated December 17, 2012 which indicates corrections to violations associated with a 30-gallon barrel of oil stored with no lid that was overflowed outside onto the storage lot due to a rain event. Ramos Environmental responded to clean-up, with 60 gallons of NON

RCRA Hazardous Waste liquid “oily water” reportedly pumped. Based on the reported composition of the waste water, the Ramos Environmental clean-up and supporting documents, along with the Return to Compliance letter, the spill violation does not create a significant hazard to the public or environment.

There are twelve (12) sites listed in the EDR Report <1/4 mile from the subject property. One (1) was an inactive 750-gallon UST located approximately 110 feet southwest of site at 251 Ticknor Court. Based on EHD records for the UST previously located at 251 Ticknor Court, the UST contained heating oil, and was removed in good condition by Nor-Cal Oil Service; based on removal records and down-gradient location, the former UST is not considered a significant hazard. Two (2) listings were leaking underground storage tanks (LUSTs) with completed cleanup and closed cases. No violations were noted for the other nine (9) sites. There are five (5) sites listed in the EDR Report ¼ – 1 mile from the subject property as reviewed in the Phase I (Petralogix, 2018); the sites located ¼ to 1 mile do not appear to represent a threat to the subject property.

The information reviewed collectively for the parcel within the Lodi High School boundary, and project site, are interpreted to have a less than significant impact. In addition, based on the EDR database records reviewed, no hazardous materials impact was identified from any surrounding parcels.

Pipelines

A Gas Distribution Map was requested via email on July 24, 2018, however, delivery is currently pending. According to Pacific Gas & Electric online interactive natural gas transmission pipeline map, one natural gas transmission pipeline has been identified approximately 660 feet northeast of the site; the gas transmission line trends south along N Ham Lane and east along W Locust Street, away from the site. According to an email correspondence with Kinder Morgan representative Steve Marositz on July 30, 2018 the nearest Kinder Morgan owned pipeline is approximately 6360 feet east of the site. The contractor(s) responsible for construction phases of the project will call 811 prior to digging or excavation in order to assure no smaller pipelines that may be within the project site are damaged. There is **less than significant impact** from gas transmission pipelines or hazardous materials pipelines.

High Voltage Transmission Lines

A message received via email on July 24, 2018, by Rafael Tapia of Lodi Electric Utility confirmed Lodi Electric Utility does not have any transmission lines or transmission easements in the project site area. An additional response by Rafael Tapia of Lodi Utility District via email on August 20, 2018 included a PDF map showing one 15-foot Public Utility easement in the southeast portion of the site parcel, and one 40-foot public utility easement located within the southern boundary of the site. Both easements are not located in within the proposed Project areas of the site; therefore, no conflict with their transmission system. There are overhead primary transmission lines located adjacent the northern boundary and western boundary of the site on the 12 kV (12,000 volts). Any work conducted near the transmission lines will be in conformance with power line safety laws/regulations. PG&E does have transmission lines which trend north-south along the eastern perimeter of the campus, however, the transmission lines are greater than 1,500 feet from the site. This is **less than significant impact** from high voltage transmission lines.

Railroad Tracks

According to the San Joaquin Valley Air Pollution District correspondence letter dated August 8, 2018, there are no railways located within one-quarter mile of the site. Based on review of aerial photographs provided by Google Earth and the *2015 United States Geological Survey (USGS) 7.5-Minute Series Topographic Map, Lodi North Quadrangle, California* map, there is railroad tracks approximately one-half mile north and one-mile east of the site. There is **no impact** to the site from railroad tracks.

Traffic Corridors

The proposed Project is not located within 500 feet of a freeway or other busy traffic corridor as defined by *Education Code* Section 17212 (d)(9) and *Public Resources Code* 21151.8I(9). There is **no impact** to the site from traffic corridors.

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 2000-19, 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**.

The Lodi High School buildings slated for demolition were constructed prior to the effect ban of most asbestos containing building materials, therefore, people's (such as students, staff, and construction workers) potential exposure of asbestos due to the demolition of asbestos containing materials is considered a moderate to high risk. If asbestos containing material is present, asbestos removal will be conducted by a certified and licensed asbestos abatement contractor. This is considered **less than significant with mitigation 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 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**.

e,f) **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 and per Section 17215(f), this section does not apply to sites acquired prior to any additions or extensions to those sites.

Based on review of aerial photographs provided by Google Earth, along with the most recent topographic maps (Lodi North, 2015 and Lodi South, 2015), the nearest runway is the Lodi Airpark, located approximately 3.5 miles southwest of the project site. The next closest airport is Ferdun Ranch airport, located approximately 3.9 miles northeast of the site. The tallest building will be 30 feet at its highest, in the northeast portion of the site. The project heights are below the Federal Aviation Administration notification limits, and the finished two-story addition will be of similar height to current buildings on campus. Therefore, this has **no impact** on the site.

g) **No Impact**. The proposed Project is not expected to interfere with road access, adopted emergency response plan or emergency evacuation plans for safety vehicles or personnel. The construction of the Project is not expected to generate excessive traffic for the area but will temporarily increase traffic at the Lodi High School Campus. There will be a path of travel (POT) plan formulated prior to construction activities beginning. The POT will be compliant with the current applicable California building code accessibility provisions for path of travel requirements. During construction, if POT items within the scope of the project represented as code compliant are found to be non-conforming beyond reasonable construction tolerances, they shall be brought into compliance. In addition, there will be a fire apparatus plan that will call for fire department access during construction activities. No **impact is expected**.

h) **No Impact**. The Project is located within a region that consists of residential houses, commercial businesses, and vacant land. The Project will not expose people or structures to a significant risk of loss, injury or death involving wild land fires. Therefore, **no impact** is expected.

IX. Hydrology and Water Quality

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

The construction will take place on Lodi Unified School District owned land, within the boundaries of the Lodi High School campus, and not within county road ditches or waterways. Construction impacts will be temporary and best management practices will be in place. The Project is subject to Construction General Permit Order No. 2009-009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as excavation. The Construction General Permit requires the development and

implementation of a Storm Water Pollution Prevention Plan (SWPPP). As such, the construction activities will include the preparation and implementation of a SWPPP to reduce construction impacts to waterways and sources.

a) **Less Than Significant Impact**. The State Water Resources Control Board (SWRCB) has adopted a National Pollutant Discharge Elimination System (NPDES) general permit for Storm Discharges Associated with Construction Activity (state permit) which requires every construction project greater than one acre to submit a Notice of Intent (NOI) for coverage, and to prepare a Storm Water Pollution Prevention Plan (SWPPP). The ground disturbance for the project is estimated at approximately 3.7 acres where the new administration and staff parking lot is anticipated and approximately 6.7 acres in the northern portion of the site anticipated for the development of new north campus classrooms and parking lot relocation, therefore, the project is subject to the NOI and SWPPP requirement. The project will comply with the terms and conditions of the NPDES, as approved by the State Water Resources Control Board under Section 402 of the Clean Water Act.

   Compliance with the terms and conditions of the NPDES, development and implementation of a SWPPP, and compliance with the Regional Water Quality Control Board discharge requirements will ensure a **less than significant impact**.

b) **No Impact**. The proposed Project property connects to the City of Lodi water utility services. Per an email correspondence received on July 30, 2018 from the Department of Water Resources Bay-Delta Office, the project does not have any impact to facilities or any work that would conflict with the proposed Project. Because the project will comply with the requirements of the City of Lodi Utilities, impacts to groundwater supplies will be **less than significant**.

c-e) **Less Than Significant Impact**. The Project is proposed to occur within the developed Lodi High School (LHS) campus property. No streams are located near the project site, therefore, there will be no alterations of stream courses. The LHS is located on relatively flat topography. The site development will consist of the demolition of the Maintenance & Operation buildings, removal of portable classrooms, demolition of permanent classrooms north of the track, and new construction including a new two-story north campus classroom structure and a new administrative building as well as a new staff parking lot north of the track and relocation of the northeastern parking lot to the northwest. A total footprint for the school repair and improvements are anticipated to be approximately 10.5 acres. The completed project will be covered with flatwork, structures, or landscaping. No substantial erosion and no flooding will occur; the project will not substantially alter the existing drainage pattern of the site or area. Therefore, this is a less than **significant impact**.

   f) **Less Than Significant Impact**. The project is located within the Lodi High School campus. The LHS repair and improvement project is not involved with any industrial processes and will not produce significant sources of pollution. The proposed Project will have water service provided by the City of Lodi Utilities; this is considered **less than significant**.

g-h) **No Impact**. The site is not located within a Special Flood Hazard Area (SFHA). According to the Federal Emergency Management Agency (FEMA) Flood Insurance Map (FIRM)06077C0168F, the proposed site is located within Flood Zone X – defined as an area determined to be outside the 0.2% annual chance floodplain and therefore of minimal flood hazard. Therefore, there is **no impact**.

i) **Less than Significant Impact**. As discussed above, the site does not fall within a 100-year flood hazard area. According to the City of *Lodi General Plan, Safety Element* (adopted April 7, 2010), the site is located within a potential dam inundation zone. Surface water stored in reservoirs on the Calaveras, Mokelumne, and Stanislaus River systems present a potential risk to inhabitants of the City of Lodi's Planning Area. Dams that present a threat of inundation to the site include Camanche, Camanche South and North Dikes, and Pardee. The flooding hazard associated with dam or levee failure is considered a low risk hazard. This is considered a l**ess than significant impact**.

j) **No Impact**. The Project will not be impacted by inundation by seiche, tsunami, or mudflow, because the project is not adjacent to any body of water that has the potential to experience a seiche or tsunami. The Project site is not in the path of any potential mudflow.

X. Land Use and Planning

Issues		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
Would the Project:					
a.	Physically divide an established community?	☐	☐	☐	■
b.	Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating on environmental effect?	☐	☐	☐	■
c.	Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	■

a) **No Impact**. The project would be located within the parcel boundary of the established Lodi High School campus and would not result in the physical division of a community. Therefore, there is **no impact** related to physical division of an established community.

b) **No Impact**. The City of Lodi's 2010 General Plan designates the Lodi High School (LHS) as "Public/Quasi-Public". The Project involves the proposed repair/improvements as well as new campus classrooms and administration buildings within the LHS campus footprint. This is consistent with the current site land use. The Project also does not propose to change any existing zoning. Thus, there is **no impact**.

c) **Less Than Significant Impact**. The City of Lodi is a signatory to San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP). The project will participate in the SJMSCP. The proposed Project will comply with the SJMSCP. Therefore, **no impact** is anticipated.

Mineral Resources

Issues		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a.	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	☐	☐	☐	■
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?	☐	☐	☐	■

According to the San Joaquin County General Plan, the primary extractive resources in San Joaquin County are sand, gravel and natural gas.

a,b)**No Impact**. According to the State Aggregate Resource Areas Map, and per the Significant Natural Resources of San Joaquin County, the proposed Project site is not located within an area of primary extractive resources. Therefore, there is **no impact.**

XI. Noise

Issues		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a.	Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	■	☐	☐
b.	Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	■	☐
c.	A substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project?	☐	☐	■	☐
d.	A substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project?	☐	☐	■	☐
e.	For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?	☐	☐	☐	■
f.	For a Project within the vicinity of a private airstrip, would the Project expose people residing or working in the Project area to excessive noise levels?	☐	☐	☐	■

Regulatory Setting

The City of Lodi addresses noise (defined generally as unwanted or undesirable sounds) within the Noise Element of the General Plan and in the Noise Ordinance. Noise exposure City standards as designed in the General Plan have been designed to protect sensitive uses (schools, libraries, churches, hospitals, nursing homes) and community members from noise hazards and to establish criteria in which to mitigate noise generating development.

a) **Less Than Significant with Mitigation Incorporated.** The Project is located within the Lodi High School campus boundary. Nearby sensitive noise-receptors include the campus faculty, students, and existing residences. The existing residences to the project include the residential houses adjacent north and west, as well the residences east following Pacific Avenue.

Noise levels associated with construction activities will be above the ambient noise levels currently within the existing Project site. However, noise levels will not be substantially higher for extended periods of time and would subside when construction activity of the proposed Project is completed. Standard construction activities which are expected to generate noise include demolition, grading, excavation, site preparation, and site development. The proposed Project is not anticipated to include generation of significant ground vibration equipment which would attribute to long-term increases of ground borne noise levels. Noise impact from construction activities will vary based on construction activity levels, project phase, and construction equipment being utilized. Due to the

proximity of the adjacent residential housing, the construction noise activity noise impacts would most likely impact the residential houses north and northwest of the Lodi High School. Based on the sensitive noise receptors and anticipated noise impact from short-term construction activities, the following mitigation measures would be implemented to reduce potential construction noise to less-than-significant-levels:

Mitigation Measure Noise-1

The Lodi Unified School District shall ensure the construction contractor implements the following noise reduction measures:

- Construction activities will be authorized under City issuance of construction permits prior to any work commencement on site;
- Construction activities shall be limited to the hours of 7:00 am to 7:00 pm Monday through Friday;
- All equipment shall have sound-controlled devices, such as quieted and enclosed air compressors and muffled exhaust pipes;
- Stationary noise sources shall be located as far from sensitive receptors as possible;
- Stationary noise sources shall be shut off when not in use;
- Consideration and selection of quieter demolition methods when possible; and
- The use of noise producing communication signals will be limited to safety warning purposes only.

Once completed, the project is anticipated to have a similar level of noise as currently exists. Therefore, with the implementation of **Mitigation Measure Noise-1**, exposure of persons to or generation of noise levels in excess of standards established bin the local general plan or noise ordinance with be **less than significant with mitigation.**

b) **Less Than Significant Impact.** There are several factors that could vary the degree of ground-borne vibrations, such as construction equipment types and operations, soil and subsurface conditions, and the receiving buildings characteristics (such as foundation type or building size). Operational noise of the new classrooms, administrative building, and parking lot additions are anticipated to be similar to current levels, and therefore has no impact. Any ground-borne vibrations associated with the project are due to the construction activities and will be intermittent and of short duration. This is considered a **less than significant impact**.

c) **Less Than Significant Impact.** The primary noise source anticipated from the project will be associated with the additional heating ventilation and air-conditioning equipment. The anticipated HVAC systems are not yet determined; however, they will be similar in noise reduction to the current HVAC systems on-site. Based upon measurements conducted for similar projects, and the assumption that all equipment will be shielded by rooftop building parapets, HVAC mechanical equipment is not expected to generate noise levels exceeding 45 dB L_{eq} at distances beyond 60 feet from the proposed building facades. This is considered **less than significant**.

d) **Less Than Significant Impact with Mitigation Incorporated.** As discussed previously in (a) above, there would be a temporary increase in localized noise during project construction. The City of Lodi Ordinance Code 9.24.030, which outlaws any noise or sound as described herein between the hours of ten p.m. and seven a.m., would be in effect during construction activities. As discussed under (a) and (c) of this section, the

proposed Project would not substantially increase the ambient noise levels in the Project's proposed vicinity greater than existing conditions. This is a **less than significant impact**.

e,f) **No Impact.** The project is not located within an airport land use plan or within two miles of a public airport or public use airport. The nearest runway is the Lodi Airpark located approximately 3.5 miles southwest of the project site. Therefore, there is no noise impact associated with the construction and/or operation of this project relative to private airports or airstrips.

XII. Population and Housing

Issues		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
Would the Project:					
a.	Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	☐	☐	☐	■
b.	Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	■
c.	Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	■

a-c) **No Impact**. The Project area is within Lodi High School campus. The Project would not include the creation of new housing nor displace any existing housing or people. The Project would not result in local area population growth or lead to the creation of or necessity for new housing; any workers required for project construction and operation are anticipated to be drawn from the regional employment base. Similarly, the Project would not indirectly induce substantial population growth through the extension of major infrastructure. Consequently, no impacts related to population and housing would occur.

XIII. Public Services

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a. Fire protection?	☐	☐	☐	■
b. Police protection?	☐	☐	☐	■
c. Schools?	☐	☐	☐	■
d. Parks?	☐	☐	☐	■
e. Other public facilities?	☐	☐	☐	■

a-e) **No Impact**. Lodi High School receives fire protection from Fire Station 4, located at 180 N Lower Sacramento Road, under 1.5 miles from the campus. The campus security is provided by City of Lodi Police Department, which is responsible for serving any property owned or controlled by the Lodi Unified School District. The project is intended to facilitate the current administrative employees. The new classroom and administration building additions will have fire alarms, interior sprinkler systems, and fire hydrants. Construction and long-term operation of the proposed Project would not place any substantial adverse impacts on fire protection, police protection, schools, or parks because the project is being implemented in order to meet current demands on campus and needed repair improvements/upgrades. The proposed Project would not increase the need for to expand current park facilities or to create new parks, nor would the project require expansion or addition of other public facilities. Therefore, the project will have **no impact**.

XIV. Recreation

	Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
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?	☐	☐	☐	■
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?	☐	☐	☐	■

a,b) **No Impact**. The proposed Project will repair/upgrade existing facilities, demolish outdated buildings, and construct new classrooms and administrative space. The proposed project will have no impact on the physical deterioration of any recreational facilities in the existing neighborhood. The proposed Project is not intended to have recreational facilities. There is **no impact**.

XV. Transportation/Traffic

Issues		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a.	Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	☐	■	☐	☐
b.	Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	☐	■	☐	☐
c.	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	■
d.	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	■	☐
e.	Result in inadequate emergency access?	☐	☐	☐	■
f.	Result in inadequate parking capacity?	☐	☐	■	☐
g.	Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	☐	☐	☐	■

The proposed Project ("Master Plan") is intended to improve the Lodi High School by the addition of new learning facility classrooms in the northern portion of the site, a new addition to the administration building, and the modification of circulation/parking lot relocations and parking lot additions for the campus. Presently, Lodi High School traffic congestion is an issue during peak hours (morning drop-off and afternoon pick-up). The proposed Project modifications for addressing circulation and parking lot congestion currently includes the removal of the existing Maintenance & Operations facility in the northwest portion of the site and relocating the current staff parking lot there with one entrance/exit at the existing northern driveway, creation of a new "on-site" student/visitor parking area at the southern end of the eastern portion of the campus with an entrance at the Pacific Avenue / Oak Street intersection at the southern end (or alternately, the student lot may have only two-way access at the southern end, and no connection to the Oak Street intersection), and a longer parent drop-off zone adjacent the west side of Pacific Avenue north of Oak Street. See Figure 5 and Figure 6 below for the Existing Site Plan and Proposed Site Plan, respectively.

The following discussion is based on the *Traffic Impact Assessment for Lodi Unified School District's Lodi HS Modernization Master Plan Project* performed by the transportation engineering firm KD Anderson & Associates, Inc. (KDA, 2018). This traffic study investigated the operational characteristics of current traffic conditions at the school during the morning and afternoon peak periods in order to identify current bottlenecks and collect information necessary to estimate relocated vehicle and pedestrian traffic, as well as monitoring of short-term parking and loading demands on and off-site when the school day ended in order to obtain background information necessary for determining the optimal strategy for

accommodating the traffic resulting from the new layout, and in identifying potential project impacts for review under the California Environmental Quality Act (CEQA).

The study investigated the traffic conditions (vehicle, bicycle, and pedestrian) for the following existing intersections:

- Pacific Avenue / Elm Street
- Pacific Avenue / Oak Street
- Pacific Avenue / Walnut Avenue
- Pacific Avenue / Lodi Avenue

The traffic study investigated the anticipated traffic conditions for the proposed Project at the following locations:

- Pacific Avenue / Elm Street
- Pacific Avenue / Oak Street
- Pacific Avenue / Walnut Avenue
- Pacific Avenue / Lodi Avenue
- Pacific Avenue / North Staff Parking Lot Access
- Pacific Avenue / Student Parking Access

The primary traffic study circulation features considered for anticipated traffic conditions are based on the following alternatives associated with the proposed Project's traffic circulation and parking:

- Provide a longer parent drop-off zone along the west side of Pacific Avenue north of Oak Street.
- Create a new faculty parking lot at the southern end of the school. Control access to this lot with a staff monitor during peak periods to avoid pedestrian conflicts.
- Create a new "on-site" student / visitor parking area at the southern end of the campus entrance at the Pacific Avenue / Oak Street intersection and exit at the southern end of the lot north of Walnut Street.
- Alternatively, the student lot may have only two-way access at the southern end and no connection to the Oak Street may be created.
- Remove the existing LUSD maintenance facility at the northwest corner of the school and relocate current staff parking into this area with a consolidated access at the existing northern driveway on Pacific Avenue.

The traffic study utilizes a qualitative measure deemed Level of Service (LOS) to analyze the quality of motor vehicle traffic for roadways and intersections. Levels of Service categorizes traffic flow by assigning quality levels based on performance measures including vehicle speed, congestion, density, etc. Level of Service is categorized for a range of operations, from LOS A (the best) to LOS F (the worst). The above referenced Traffic Study is available for review in **Appendix E**.

Significance Criteria

From the standpoint of CEQA, the quality of current and "plus project" traffic conditions have been evaluated by KDA within the context of the City of Lodi's goal for intersections and roadway segments to operate at LOS D or better; in general, peak hour at LOS E or better that degrades to a LOS F or worse is considered a significant direct impact. A cumulative impact can occur if the intersection level of service is already operating below City/County standards and the Project increases the delay by more than two seconds. A traffic increase, traffic hazard, or parking deficiency would be considered in the analysis to be "substantial" if any of the following criteria are met:

- Operations (LOS) at an unsignalized intersection deteriorate from an acceptable level (LOS E or better) under existing conditions to an unacceptable level;
- Project traffic causes a traffic signal warrant to be met;
- Project design results in inadequate emergency access;
- Project site design is inadequate such that it may deteriorate circulation, sight distance, or emergency vehicle access;
- Parking space requirements of the City of Lodi are not met and/or parking is not adequate in number or design to serve the proposed Project; or
- Project construction vehicle traffic.

a,b) **Less Than Significant Impact with Mitigation Incorporated.** As discussed above, Lodi High School traffic congestion (i.e. low Levels of Service) is currently considered an issue during peak hours (morning drop-off and afternoon pick-up), specifically pertaining to the Pacific Avenue / Elm Street intersection. Based on calculated levels of service as reported in the *Traffic Impact Assessment for Lodi Unified School District's Lodi HS Modernization Master Plan Project* performed by the transportation engineering firm KD Anderson & Associates, Inc. (KDA, 2018), all locations would satisfy the City of Lodi's Level of Service standard, and the impacts of the project under CEQA would not be significant. Current traffic conditions and proposed Project conditions based on the Traffic Impact Assessment by KDA are discussed further below.

Characteristics of Current Traffic Conditions

Per KDA, current a.m. peak hour traffic operation conditions in the area of Lodi HS have been described quantitatively using methods that are accepted under the California Environment Quality Act (CEQA) and accepted by the City of Lodi. In addition, KDA supplemented data with site visit observations conducted on September 6, 2018. Based on the observed traffic conditions near the school in the morning and after school, KDA notes the following as important current traffic observations:

- The flow of traffic on Pacific Avenue along the school is greatly influenced by parent drop-off and loading activity. Because the site has relatively little designated drop-off area, parents routinely stop in the middle of Pacific Avenue to discharge students. This causes appreciable delays at the Pacific Avenue / Oak Street intersection.

- Pedestrian activity is a major constraint to traffic flow, particularly at all-way stop locations. During the peak period the combination of pedestrians and in-street drop-off created long queues on Pacific Avenue that extended back from the Oak Street intersection to the main parking lot driveways.

- The large number of pedestrians caused much longer delays at the Pacific Avenue intersections with Elm Street and Lodi Avenue than would have been expected from the LOS analysis calculations. The queue peak period traffic extended back from Lodi Avenue nearly to Walnut Street, and the northbound queue from Elm Street reach the middle of the main parking lot.

- Moderate delays occurred at the main parking lot driveways in the afternoon as students left the campus. These delays were primarily the result of the large number of pedestrians that walked along the west side of Pacific Avenue at that time.

- Many pedestrians traveled to and from "defacto" off-site drop-off locations. Many parents parked in the lot at the NE corner of Pacific Avenue / Elm Street, while others parked along the north side of Lodi Avenue west of Pacific Avenue.

Based on the LOS analysis provided by KDA in Table T-1 and the Proposed Master Plan Project conditions discussed below, all locations would satisfy the City of Lodi's minimum Level of Service standard, and the impacts of the project under CEQA would not be significant.

Proposed Master Plan Project Circulation Features

KDA reviewed the proposed Project modifications (i.e. "The Master Plan") for addressing circulation and parking lot congestion intended to create new and improved learning facilities while modifying the circulation and parking layout to increase student safety and efficiency. The primary features and alternatives related to circulation and parking addressed include the following:

- Provide a longer parent drop-off zone along the west side of Pacific Avenue north of Oak Street.

- Relocate the existing LUSD maintenance facility at the northwest corner of the school and relocate current staff parking into this area with a consolidated access at the existing northern driveway on Pacific Avenue; the new faculty parking lot at the north end of the school will have control access to this lot with a staff monitor during peak periods to avoid pedestrian conflicts.

- Create a new "on-site" student / visitor parking area at the southern end of the campus with an entrance at the Pacific Avenue / Oak Street intersection and exit at the southern end.

- Alternatively, the student lot may have only two-way access at the southern end, and no connection to the Oak Street may be created.

Because the proposed Project does not anticipate increased enrollment, the overall travel to and from the school should not change, however, KDA states the introduction of new more efficient drop-off and loading will likely change travel patterns for trips and the amount of traffic at select locations may increase or decrease. Details regarding KDA's

methods and assumptions can be reviewed further in the traffic study provided in **Appendix E**. As noted, all locations with the proposed Project implemented would satisfy the City of Lodi's minimum Level of Service standard, and the impacts of the project under CEQA would not be significant. **The proposed project campus modifications would improve traffic conditions for the site.**

The table below summarizes the current conditions compared with anticipated conditions plus Master Plan (Proposed Project) AM Peak Hour Conditions, while considering an option of Full Access at Oak Street and No Access at Oak Street:

Table T-1. Existing Plus Master Plan AM Peak Hour Conditions at Study Intersections

Location	Control	Current Conditions (No Project)		Proposed Project (Master Plan)			
				Conditions with Full Access at Oak Street		Conditions with No Access at Oak Street	
		Average Delay (sec/veh)	Level of Service	Average Delay (sec/veh)	Level of Service	Average Delay (sec/veh)	Level of Service
Pacific Ave / Elm St. Northbound approach only Southbound approach only	NB/SB Stop	27 55	D F	10 31	B D	10 31	B D
Pacific Ave / North Staff Lot Access Eastbound approach only	EB Stop	—	—	14	B	14	B
Pacific Ave / Oak St	All-way Stop	14	B	22	C	22	C
Pacific Ave / Student Parking Access Eastbound approach only	EB Stop	—	—	16	C	17	C
Pacific Ave / Walnut Ave Northbound approach only	NB Stop	20	C	16	B	15	C
Pacific Ave / Lodi Ave Southbound approach only	SB Stop	14	B	13	B	17	C

Source: Traffic Impact Assessment for Lodi Unified School District's Lodi HS Modernization Master Plan Project, KD Anderson & Associates, 2018

Note: Traffic signal warrants satisfied are "no" for all scenarios.

A.M. Traffic Conditions with the Master Plan Implementation

As table T-1 illustrates, all locations would satisfy the City of Lodi's minimum Level of Service standard, and the impacts of the project under CEQA would not be significant.

Per KDA, the **Pacific Avenue / Elm Street intersection** is expected to improve with the proposed Project. If more motorists arrive via the Pacific Avenue/Elm Street intersection, then it would be more difficult for drivers to leave the site by heading north on Pacific Avenue to go west on Elm Street or cross the street; the traffic assessment anticipates few if any parents will elect to do so, and the resulting Level of Service for northbound right turns will be acceptable even though the intersection will be very busy.

Under the Plus Project conditions, the operation of the **Pacific Avenue / Lodi Avenue intersection** is likely to be better or remain similar to current conditions.

Because more traffic will arrive from Elm Street, less traffic heads to the **Pacific Avenue / Walnut Street intersection**. Per KDA, the delays for the motorists on the northbound Pacific Avenue approach are moderate and LOS B-C will result.

The Level of Service at the **Pacific Avenue / Oak Street / Student Lot Access intersection** is projected by the traffic assessment to be a LOS C with the proposed Project. Theoretically, the delays associated with the proposed Project (Master Plan) condition are calculated to be longer than those occurring today, however, the long delays and queueing at the Pacific Avenue / Oak Street intersection today are caused by large numbers of student pedestrians crossing Pacific Avenue as well as in-street drop-off activity, rather than the actual volume of cars and capacity of the intersection. If fewer parents drop off students in the neighborhood east of the school and no drop-off comes from through travel lanes, as should be the case, we would not expect as much of the unorganized pedestrian activity which currently contributes to poor conditions. KDA anticipates the actual conditions at the intersection will likely be better than those found today, because with the Master Plan implementation, in-street drop-off should be eliminated.

Per KDA, the extent to which possibly changing the Master Plan to eliminate a direct student parking connection to the Oak Street intersection may improve conditions has also been considered. Most student traffic is expected to use the southern streets to travel to their parking lot, therefore, the connection to Oak Street would not be heavily utilized by student drivers and the overall delay at the Oak Street / Pacific Avenue intersection is relatively unchanged without the connection.

The proposed new **Pacific Avenue / Student Parking Lot intersection south of Oak Street** is estimated to work adequately whether or not there is additional parking access at Oak Street. If the Oak Street connection is eliminated, then delays at the southern lot may be slightly longer.

Afternoon Conditions

The traffic conditions for the afternoon are anticipated to be slightly different, since parents will likely gather at the campus prior to dismissal. Per KDA, the overall volume of traffic is typically lower, and the issue of short-term loading space becomes the key issue. The afternoon traffic was not assessed quantitatively, however, the morning traffic operations provide guidance to for assessing conditions occurring in the afternoon.

North Staff Parking Lot. Under the proposed Project, students would not be exiting from the northern staff parking lot. Faculty attempting to pass through southbound parent traffic may encounter difficulty exiting. The following mitigation measure will be implemented to reduce traffic conflict from the north staff parking lot:

Mitigation Measure Traffic-1

The Lodi Unified School District shall ensure the safety of pedestrians along the Pacific Avenue sidewalk and improved Level of Service conditions for vehicle traffic exiting the north staff parking lot by stationing a staff member to monitor the interaction between pedestrian and vehicle traffic at this location.

Pacific Avenue / Designated Drop-off Zone. The designated pick-up zone will be longer, however, as the case with all schools, the zone will not be long enough to accommodate all parents who choose to wait for the bell in the afternoon. If parents elect to form a queue along this zone, it may back up into Pacific Avenue's through lanes. The following mitigation measure will be implemented to reduce traffic conflict from the designated drop-off / pick-up zone:

Mitigation Measure Traffic-2
The Lodi Unified School District shall ensure the flow of traffic at the parent drop-off zone by installing a staff monitor and ongoing communication with parents.

Pacific Avenue / Student Parking Access. This location is not anticipated to be a problem, as nearly all the students are anticipated to turn right when they exit to avoid the Pacific Avenue / Oak Street intersection. LUSD will monitor the Student Parking Access / Pacific Avenue location to determine whether a traffic monitor is required to direct afterschool traffic.

Mitigation Measure Traffic-3
The Lodi Unified School District will monitor the Pacific Avenue / Student Parking Access to determine if a traffic monitor is required to direct after school traffic. LUSD will assign a traffic monitor as needed.

Pedestrian Crossings
KDA notes throughout the traffic assessment that there is currently considerable pedestrian activity along and across Pacific Avenue. The proposed Project is intended to reduce some pedestrians by creating more on-site parking and a dedicated drop-off zone, some parents may still park off-site and create pedestrians. A key pedestrian crossing location is the Pacific Avenue / Oak Street intersections; because so many motorists will be making southbound to eastbound left turns, KDA notes it would be desirable to limit Pacific Avenue crossing to the south side alone, however, this limitation will likely cause more crossing on Oak Street east of the intersection. In an effort to increase the safety for pedestrians, the following Mitigation Measure Traffic-4 will be implemented to reduce the impact to less than significant.

Mitigation Measure Traffic-4
The Lodi Unified School District will assign a traffic monitor at the Pacific Avenue / Oak Street intersections during the afternoon to facilitate pedestrian crossings.

Based on calculated levels of service as reported in the *Traffic Impact Assessment for Lodi Unified School District's Lodi HS Modernization Master Plan Project* performed by the transportation engineering firm KD Anderson & Associates, Inc. (KDA, 2018), all locations would satisfy the City of Lodi's Level of Service standard, and the impacts of the project under CEQA would not be significant. In addition, LUSD will implement the Mitigation Measures discussed above to further reduce traffic impacts and pedestrian safety. This is considered a **less than significant with mitigation impact**.

Cumulative Traffic Impacts
CEQA requires assessment of cumulative impacts, either based on assessment of the effects of other reasonably foreseeable projects or in the case of transportation, based on long-term background forecasts. Locally, the area around Lodi HS is already built out, and there is no significant increase in enrollment anticipated for the school. KDA assessed the

potential cumulative effect in long-term traffic volumes on Elm Street and Lodi Avenue which may increase due to city-wide growth (KDA, 2018). The cumulative growth assessment by KDA makes use of future traffic volume forecasts presented in the City of Lodi General Plan EIR (GPEIR) to assess future conditions with and without the proposed Project. Based on the cumulative volumes estimated by applying the identified growth rates to non-school traffic during the peak 15 minutes at the Elm Street and Lodi Avenue intersections. KDA determined traffic conditions would be relatively unchanged compared to current background conditions; cumulative volumes as local intersections immediately adjoining the Lodi HS would not be affected by long term growth whether the proposed Project is implemented or not. With the Master Plan implements, the City's minimum Level of Service standards can continue to be met. Therefore, the cumulative impacts of the proposed Project are considered to be less than significant.

Future traffic volume forecasts and conclusions are available for review in the *Traffic Impact Assessment for Lodi Unified School District's Lodi HS Modernization Master Plan Project* performed by the transportation engineering firm KD Anderson & Associates, Inc. in **Appendix E**.

c) **No Impact.** Based on a review of the most recent topographic maps (Lodi North, 2015 and Lodi South, 2015), the Lodi Airpark is the nearest airport, located approximately 3.5 miles southwest of the proposed project site. Due to the distance and height of the proposed project, there will be **no impact** on air traffic patterns.

d) **Less than Significant Impact**. The proposed Project does not include design features that would increase hazards or incompatible uses because the proposed project would not include the construction of any new streets or roads. Although the modifications to the site may result in a change of some of the travel patterns for the campus, the project will not facilitate growth and land use remains the same. The proposed project would not increase hazards due to a design feature, such as a sharp curve or dangerous intersection, incompatible uses, such as farming equipment, or inadequate emergency access. Therefore, the project would have **less than significant impact**.

e) **No Impact**. The proposed project will not result in inadequate emergency access to the project area. During on-site construction, vehicles will not block emergency access routes. A path of travel (POT) will be identified in the construction documents, which will be compliant with the current applicable California building code accessibility provisions for path of travel requirements. During construction, if POT items within the scope of the project represented as code compliant are found to be non-conforming beyond reasonable construction tolerances, they shall be brought into compliance. When project is complete, there will continue to be access from the southern entrance of the campus which will connect to the new northern parking lots. Therefore, the project would have **no impact** to emergency access.

f) **Less Than Significant Impact.** The proposed Project will not generate the need for new parking capacity; a portion of the Project will be focused on addressing the current shortage of available parking at the LHS. Approximately 480 new parking spaces will be created, primarily in the new staff parking north of the track adjacent to S. Pacific Avenue. The project is needed in order to accommodate the current shortage of parking space for the immediate administrative staff, as well as consolidation of student classrooms to the proposed two-story structures in the northeast. The project will not generate the need for

new parking capacity as it is intended to serve current needs. Any construction parking impacts will be short term. This is a less **than significant impact**.

g) **No Impact**. The Project would not conflict with any applicable land use plan, policy, or regulation supporting alternative transportation of an agency with jurisdiction over the project. **No impact** would result during the construction or operation phase.

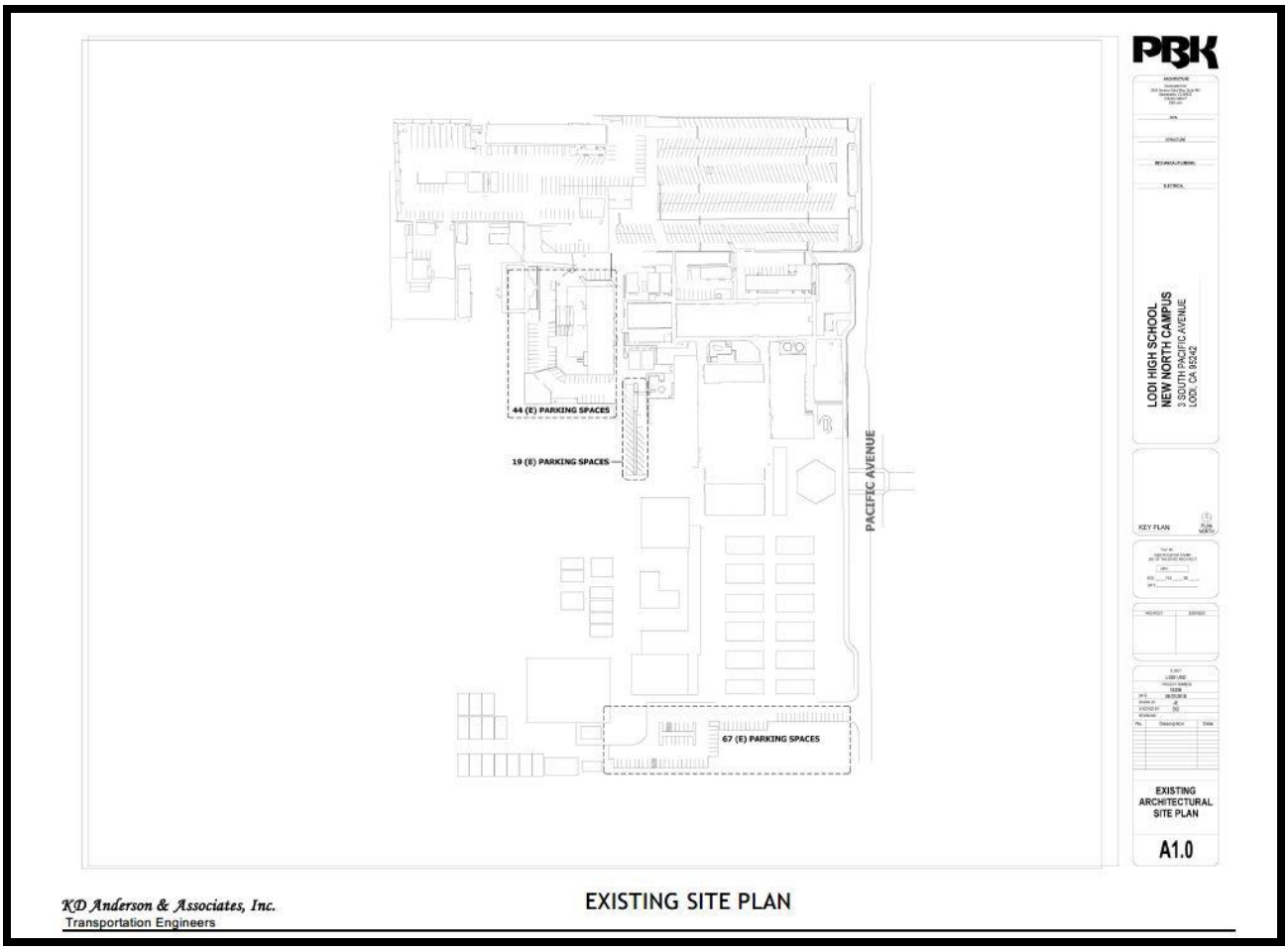

Figure 5: Existing Site Plan

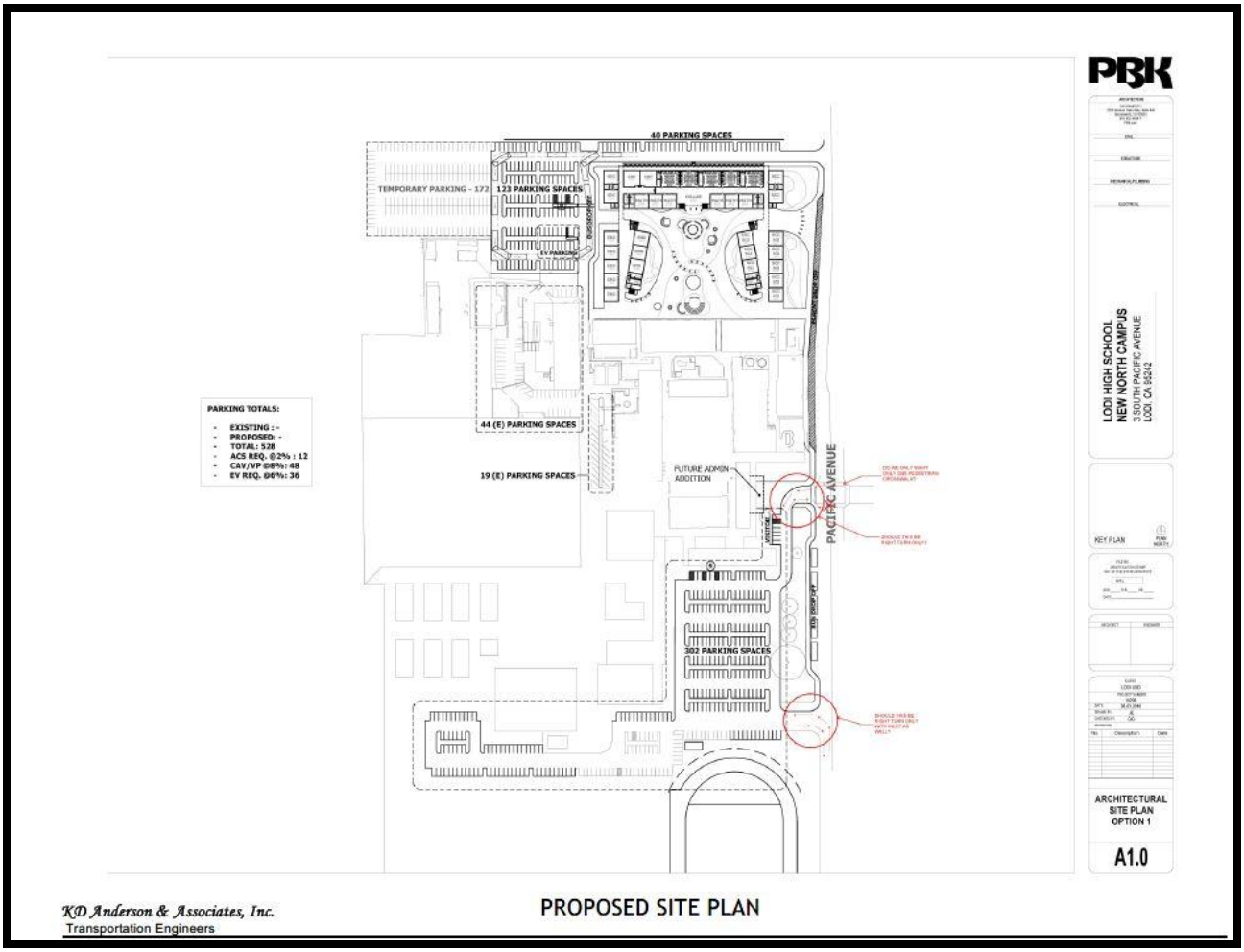

Figure 6: Proposed Site Plan

Utilities and Service Systems

Issues		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a.	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	■	☐
b.	Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	■	☐
c.	Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	■	☐
d.	Have sufficient water supplies available to serve the Project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	■	☐
e.	Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's Projected demand in addition to the provider's existing commitments?	☐	☐	■	☐
f.	Be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs?	☐	☐	■	☐
g.	Comply with federal, state, and local statutes, and regulations related to solid waste?	☐	☐	■	☐

a,b) **Less Than Significant Impact**. The project would tie into existing sewer utility infrastructure already in place at the Lodi High School, serviced by the sewer utility provider City of Lodi. Public sewer maps provided by the City of Lodi confirm there are no sewer easements located in the project area. The proposed Project does not result in an increased demand that would exceed wastewater treatment requirements. There will be twenty urinals and twelve sinks demolished and replaced with approximately fifty-two urinals and twenty sinks. This is considered a **less than significant impact**.

c) **Less Than Significant Impact**. The Project may include a modest number of additional storm drains; any additional drains will connect to the existing storm drain system at the site, which is serviced by the City of Lodi. The project will not require the construction of new storm water drainage facilities. The overall storm and wastewater treatment needs will remain relatively similar, as the project does not significantly increase the percentage of impermeable surfaces, nor does it expand facilities to accommodate and increase in student or faculty loads. A Stormwater Pollution Prevention Plan (SWPPP) and an Erosion and Sediment Control Plan will be prepared and implemented to avoid and minimize impacts on water quality during construction and operations. Best management practices (BMPs) for erosion control will be implemented to avoid and minimize impacts on the environment during construction. There will be a **less than significant impact**

d) **Less Than Significant Impact.** The proposed Project development will not require a new water supply and/or need the expansion of water sources. The school is currently serviced by Lodi Utility Water Department which is capable of supporting the proposed Project; the project is intended to facilitate the current school demands for classroom upgrades, new construction, and parking space, and as such is not anticipated to greatly increase water supply demand for the site. The Project will comply with the requirements of the supervising agency (Lodi Utilities, Water Department). The impact is **less than significant**.

e) **Less Than Significant Impact.** Wastewater treatment is provided by the City of Lodi's White Slough Water Pollution Control Facility (WPCF). The WPCF is currently constructing an expansion pond and associated conveyance at the WPCF, in part to continue to meet increased demands anticipated at the facility. In addition, the project is not anticipated to significantly increase wastewater treatment demand. This is a **less than significant impact**.

f,g) **Less Than Significant Impact.** The proposed Project is intended to facilitate current staff and student enrollment; the Project would not require the development of a new landfill facility. Solid waste collection for Lodi High School is provided by Cal-Waste Recovery Systems, solid waste is then hauled to the North County Landfill, located at 17720 E. Harney Lane in San Joaquin County. According to the California Waste Management Board (CIWMB), the North County Landfill is Class III landfill with a current daily maximum waste load of approximately 541 tons per day average, which is well below the permit limit of 1,200 tons per day. Construction or long-term operation of the proposed project would not require the development of a new landfill facility. The amount of solid waste that would be generated by the operation of the facility would not have a significant impact on the operation or the life expectancy of the landfill. There is no conflict with federal, state or local regulations. This is a **less than significant impact**.

XVI. Mandatory Findings of Significance

Issues		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a.	Does the Project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	■	☐	☐
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)?	☐	☐	■	☐
c.	Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	■	☐

a) **Less than Significant with Mitigation Incorporated.** As discussed in Section 5, *Biological Resources* and Section 6, *Cultural Resources*, 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 or eliminate important examples of the major periods of California history or prehistory. Mitigation Measures included to address potential impacts to Swainson's hawk, nesting migratory birds, and potential impacts to cultural resources are reduced to less than significant levels.

b) **Less than Significant Impact.** The proposed Project would not result in cumulatively considerable impacts. The proposed school repair and improvements are intended to service the current student body and faculty attending Lodi High School, with building improvements replacing older less efficient structures. The proposed Project will not serve to facilitate any anticipated growth in enrollment and/or employment. This is a **less than significant impact**.

c) **Less than Significant Impact.** The proposed project site is not located within an Airport Community Planning Area, or within a Special Flood Hazard Zone. The proposed Project site is not located on or near a hazardous materials site, or a known fault zone. Potential short-term effects on air quality during the construction phase will comply with all applicable regulations specified by the San Joaquin Valley Air Pollution Control District. The project does not have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly.

13. SUMMARY OF MITIGATION MEASURES

This section represents the required mitigation measures identified in Section 12.0 Environmental Checklist. Implementation of these mitigation measures would reduce all impacts of the proposed Project to a less than significant level. The Lodi Unified School District has committed to implementing all required mitigation measures.

AIR QUALITY

Air Quality Mitigation 1

The District shall not begin construction activities until first securing appropriate permits from the San Joaquin Valley Air Control District.

Air Quality Mitigation 2: Construction of the proposed Project shall comply with all the applicable regulations specified in the San Joaquin Valley Air Pollution Control District Regulation VIII (Fugitive Dust Rules). The following procedures will be adhered to by the construction contractor(s) in accordance with Regulation VIII practices:

- Visible Dust Emissions (VDE) from construction, demolition, excavation or other earthmoving activities related to the Project shall be limited to 20% opacity or less, as defined in Rule 8011.
- Pre-water all land clearing, grubbing, scraping, excavation, land leveling, grading, cut and fill, and phase earthmoving.
- Apply water, chemical/organic stabilizer/suppressant, or vegetative ground cover to all disturbed areas, including unpaved roads.
- Restrict vehicular access to the disturbance area during periods of inactivity.
- Apply water or chemical/organic stabilizers/suppressants, construct wind barriers and/or cover exposed potentially dust-generating materials.
- When materials are transported off-site, stabilize and cover all materials to be transported and maintain six inches of freeboard (i.e., minimum vertical distance between the top of the load and the top of the trailer) space from the top of the container.
- Remove carryout and trackout of soil materials on a daily basis unless it extends more than 50 feet from site; carryout and trackout extending more than 50 feet from the site shall be removed immediately. The use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions. Use of blower devices is expressly forbidden. If the Project would involve more than 150 construction vehicle trips per day onto the public street, additional restrictions specified in Section 5.8 of Rule 8041 shall apply.
- Traffic speeds on unpaved roads shall be limited to 15 mph.

- During construction, all earth moving activities shall cease during periods of high winds (i.e., greater than 30 mph). To assure compliance with this measure, grading activities are subject to periodic inspections by LUSD staff.

- Construction equipment shall be kept in proper operating condition, including proper engine tuning and exhaust control systems.
- Areas following clearing, grubbing and/or grading shall receive appropriate BMP treatments (e.g., re-vegetation, mulching, covering with tarps, etc.) to prevent fugitive dust generation.
- All exposed soil or material stockpiles that will not be used within 3 days shall be enclosed, covered, or watered twice daily, or shall be stabilized with approved nontoxic chemical soil binders at a rate to be determined by the on-site construction supervisor.
- Unpaved access roads shall be stabilized via frequent watering, non-toxic chemical stabilization, temporary paving, or equivalent measures at a rate to be determined by the on-site construction supervisor.
- Trucks transporting materials to and from the site shall allow for at least two feet of freeboard. Alternatively, trucks transporting materials shall be covered.
- Where visible soil material is tracked onto adjacent public paved roads, the paved roads shall be swept, and debris shall be returned to the construction site or transported off site for disposal.
- Wheel washers, dirt knock-off grates/mats, or equivalent measures shall be installed within the construction site where vehicles exit unpaved roads onto paved roads.
- Diesel powered construction equipment shall be maintained in accordance with manufacturer's requirements and shall be retrofitted with diesel particulate filters where available and practicable.
- Heavy duty diesel trucks and gasoline powered equipment shall be turned off if idling is anticipated to last for more than 5 minutes.
- Where feasible, the construction contractor shall use alternatively fueled construction equipment, such as electric or natural gas-powered equipment or biofuel.
- Heavy construction equipment shall use low NOx diesel fuel to the extent that it is readily available at the time of construction.
- The construction contractor shall maintain signage along the construction perimeter with the name and telephone number of the individual in charge of implementing the construction emissions mitigation plan, and with the telephone number of the SJVAPCD's complaint line. The contractor's representative shall maintain a log of any public complaints and corrective actions taken to resolve complaints.
- During grading and site preparation activities, exposed soil areas shall be stabilized via frequent watering, non-toxic chemical stabilization, or equivalent measures at a rate to be determined by the on-site construction supervisor.
- During windy days when fugitive dust can be observed leaving the construction site, additional applications of water shall be required at a rate to be determined by the onsite construction supervisor.

Air Quality Mitigation 3

The contractor shall adhere to SJVAPCD District Rule 4641 (*Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations*) to reduce emissions during asphalt paving activities. This rule applies to the manufacture and use of cutback asphalt, slow cure asphalt and emulsified asphalt for paving and maintenance operations.

Air Quality Mitigation 4

The Lodi Unified School District shall adhere to SJVAPCD District Rule 4002 (*National emission Standards for Hazardous Air Pollutants for Asbestos*) intended to protect the public from asbestos exposure, promote compliance by providing accurate information to the regulated community, and provide consistency and direction to all SJVAPCD inspectors involved in enforcing provisions of 40 CFR Part 61 Subpart M – Asbestos, NESHAP (District Rule 4002).

These mitigation measures shall be a note on construction plans.

Air Quality Mitigation 5

- All mobile diesel-powered off-road equipment larger than 50 horsepower and operating on the site for more than two days straight shall meet U.S. EPA particulate matter emissions standards for Tier 3 or cleaner engines, with the goal of utilizing Tier 4 Interim or Tier 4 Final whenever possible. The project contractor shall ensure that all off-road, diesel powered equipment used during construction shall be equipped with a Level 3 Diesel Particulate Filter (DPF).
- The number of hours equipment will operate shall be minimal, including the use of idling restrictions.

These mitigation measures shall be a note on construction plans.

Air Quality Mitigation 4

- All mobile diesel-powered off-road equipment larger than 50 horsepower and operating on the site for more than two days straight shall meet U.S. EPA particulate matter emissions standards for Tier 2 engines or equivalent.
- All diesel-powered portable equipment (i.e. air compressors, forklifts) larger than 50 horsepower operating on the site for more than two days straight shall meet U.S. EPA particulate matter emissions standards for Tier 4 engines or equivalent.
- The number of hours equipment will operate shall be minimal, including the use of idling restrictions.

This mitigation measures shall be a note on construction plans.

GREENHOUSE GAS EMISSIONS

Mitigation Measure GHG – 1

- Eighty trees will be planted post construction.
- Three additional bike racks and six lockers will be added post construction.

BIOLOGICAL RESOURCES

Biological Resources Mitigation Measure 1 - Preconstruction Survey Requirements
A qualified biologist shall conduct a preconstruction survey for nesting Swainson's hawks within 0.25 miles of the project site if construction commences between March 1 and September 15. If active nests are found, a qualified biologist should determine the need (if any) for temporal restrictions on construction. This determination should be pursuant to criteria set forth by CDFW (Moore Biological Consultants, 2018).

On-site trees, shrubs, and grasslands may be used by nesting birds protected by the Migratory Bird Treaty Act of 1918 and Fish and Game Code of California. A qualified biologist shall conduct a preconstruction nesting bird survey if vegetation removal and/or project construction occurs between February 1 and August 31. If active nests are found within the survey area, vegetation removal and/or project construction should be delayed until a qualified biologist determines nesting is complete (Moore Biological Consultants, 2018).

In addition to these mitigation measures, the City of Lodi has adopted the San Joaquin County Multispecies Habitat and Open Space Plan (SJMSCP), and the Project's participation in the plan is required by the City. The project is subject to SJMSCP and must contact SJMSCP approximately 30 days prior to ground disturbance activities.

CULTURAL RESOURCES

Cultural Resources Mitigation Measure CR-1
If prehistoric or historic-period archaeological deposits are discovered during Project activities, all work within 50 feet of the discovery should be redirected and the archaeologist should assess the situation, consult with agencies as appropriate, and make recommendations regarding the treatment of the discovery. Impacts to archaeological deposits should be avoided by Project activities, but if such impacts cannot be avoided, the deposits should be evaluated for their California Register eligibility. If the deposits are not California Register–eligible, no further protection of the finds is necessary. If the deposits are California Register–eligible, they should be protected from Project-related impacts, or such impacts should be mitigated. Mitigation may consist of, but is not necessarily limited to, systematic recovery and analysis of archaeological deposits, recording the resource, preparation of a report of findings, and accessioning recovered archaeological materials at an appropriate curation facility. Public educational outreach may also be appropriate.

Cultural Resources Mitigation Measure CR-2
Should paleontological resources be identified on the Project site during any ground disturbing activities related to the Project, all 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.

Cultural Resources Mitigation Measure CR-3

Any human remains encountered during Project ground-disturbing activities should be treated in accordance with California Health and Safety Co de Section 7050.5. The lead agency should inform its contractor(s) of the sensitivity of the Direct Area of Potential Effect for human remains and verify that the following directive has been included in the appropriate contract documents:

> If human remains are encountered during Project activities, the Project shall comply with the requirements of California Health and Safety Code Section 7050.5. There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the county coroner has determined the manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation or to his or her authorized representative. At the same time, an archaeologist shall be contacted to assess the situation and consult with agencies as appropriate. Project personnel/ construction workers shall not collect or move any human remains and associated materials. If the human remains are of Native American origin, the coroner must notify the Native American Heritage Commission within 24 hours of this identification. The Native American Heritage Commission will identify a Native American Most Likely Descendant to inspect the site and provide recommendations for the proper treatment of the remains and associated grave goods.

GEOLOGY AND SOILS

Geology and Soils Mitigation 1

Standard design and construction techniques will be used to mitigate the potential for damage due to seismically induced strong ground shaking. Based on the planned mitigation, and the project being located outside an Alquist-Priolo Earthquake Fault Zone, ground shaking damage is considered **less than significant with mitigation.**

Geology and Soils Mitigation 2

Earthwork on the project shall be observed and evaluated by MPE. Evaluation of earthwork shall include observation and testing of engineered fill, subgrade preparation, foundation bearing soils, and other geotechnical conditions during the construction of the project. Standard design and construction techniques will then be used to mitigate the potential for damage. In addition, the Project will be subject to applicable engineering and County and City code requirements, which would ensure that they are developed in a way that minimizes the possible effects of unstable soil. Therefore, the impact from expansive soil is considered less than significant with mitigation.

HAZARDS AND HAZARDOUS MATERIALS

Hazards and Hazardous Materials Mitigation-1
Spill Prevention and Control Measures will be implemented and include the following:

- Any fuel products, lubricating fluids, grease, or other products and/or waste released from the Contractor(s) vehicles, equipment, or operations, shall be collected and disposed of immediately, and in accordance with State, Federal, and local laws.
- Spill clean-up materials will be stored near potential spill areas (such as vehicle and equipment staging areas).
- Spill kits will include sorbent material (such as pads designed for oil and gas), socks and/or pads to prevent spread of hazardous material, and containers for storing and proper disposal.
- Employees and contractor(s) will be trained on proper hazardous spill clean-up practices.

NOISE

Mitigation Measure Noise-1
The Lodi Unified School District shall ensure the construction contractor implements the following noise reduction measures:

- Construction activities will be authorized under City issuance of construction permits prior to any work commencement on site;
- Construction activities shall be limited to the hours of 7:00 am to 7:00 pm Monday through Friday;
- All equipment shall have sound-controlled devices, such as quieted and enclosed air compressors and muffled exhaust pipes;
- Stationary noise sources shall be located as far from sensitive receptors as possible;
- Stationary noise sources shall be shut off when not in use;
- Consideration and selection of quieter demolition methods when possible; and
- The use of noise producing communication signals will be limited to safety warning purposes only.

Transportation/Traffic

Mitigation Measure Traffic-1
The Lodi Unified School District shall ensure the safety of pedestrians along the Pacific Avenue sidewalk and improved Level of Service conditions for vehicle traffic exiting the north staff parking lot by stationing a staff member to monitor the interaction between pedestrian and vehicle traffic at this location.

Mitigation Measure Traffic-2
The Lodi Unified School District shall ensure the flow of traffic at the parent drop-off zone by installing a staff monitor and ongoing communication with parents.

Mitigation Measure Traffic-3

The Lodi Unified School District will monitor the Pacific Avenue / Student Parking Access to determine if a traffic monitor is required to direct after school traffic. LUSD will assign a traffic monitor as needed.

Mitigation Measure Traffic-4

The Lodi Unified School District will assign a traffic monitor at the Pacific Avenue / Oak Street intersections during the afternoon to facilitate pedestrian crossings.

14. DOCUMENTS REFERENCED

- Alquist-Priolo Earthquake Fault Zoning Act (http: www.consrv.ca.gov/dmg/shezp/maps/mora4.htm).
- 2016 California Environmental Quality Act Statute and Guidelines.
- California Department of Conservation (CDC), Division of Mines, *California Geological Survey - SMARA Mineral Land Classification Map 2006*.
- California Department of Transportation, Scenic Highway Program. Updated September 7, 2011. Available Online at http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm
- California Department of Transportation. *Scenic Highway Guidelines*. Available online at http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/guidelines/scenic_hwy_guidelines_04-12-2012.pdf
- California Department of Conservation Important Farmland Finder. Accessed September 2, 2018. Available online at http://www.conservation.ca.gov/dlrp/fmmp/
- California Emissions Estimator Model (CalEEMod) User's Guide, September 2016. Available online at http://www.caleemod.com/
- California Geological Survey (CGS), Aggregate Sustainability Map, Sheet 52, 2012. Available online at: https://www.countyofnapa.org/DocumentCenter/View/761/2012-Report-Aggregate-Sustainability-in-California-PDF, accessed September 1, 2018.
- State of California Department of Conservation, Ground Motion Interpolator (2008) http://www.quake.ca.gov/gmaps/PSHA/psha_interpolator.html, accessed August 18, 2018
- California, State of, Water Resources Control Board. GeoTracker. 2015. Available online at http://www.geotracker.swrcb.ca.gov
- Cortese list of Hazardous Waste and Substances Sites, http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm, accessed online August 30, 2018.
- Department of Toxic Substances Control ENVIROSTOR Site, http://www.envirostor.dtsc.ca.gov/public/search.asp?basic=True, accessed online August 30, 2018 Environmental Protection Agency, Map of Radon Zones, California. 402-R-93-025, 1993.
- Federal Aviation Administration Notice Criteria Tool. https://oeaaa.faa.gov/oeaaa/external/gisTools/gisAction.jsp Accessed September 1, 2018.
- Federal Transit Administration (FTA), *Transit Noise and Vibration Impact Assessment.* May 2006.
- Federal Emergency Management Agency (FEMA), October 16, 2009, Flood Insurance Rate Map (FIRM), Panel 168, Map Number 06077C0168, San Joaquin County and Incorporated Areas, California.
- KD Anderson & Associates, Inc. *Traffic Impact Assessment for Lodi Unified School district's Lodi HS Modernization Master Plan Project*. November 1, 2018.

- Mid Pacific Engineering, *Geologic Hazards and Geotechnical Engineering Report: Lodi High School Improvements, Lodi, California.* August 17, 2018.
- Moore Biological Consultants. *Lodi High School Measure U Project.* San Joaquin County, California: Biological Resources Assessment. September 5, 2018.
- National Pipeline Mapping System. https://www.npms.phmsa.dot.gov/ Accessed on August 30, 2018.
- Pacific Gas and Electric. Gas Transmission Pipeline Map. https://www.pge.com/en_US/safety/how-the-system-works/natural-gas-system-overview/gas-transmission-pipeline/gas-transmission-pipelines.page. Accessed September 7, 2018.
- Petralogix Engineering, Inc. Lodi High School Phase I. October 9, 2018.
- San Joaquin Valley Air Pollution Control District (SJVAPCD), *Guide for Assessing and Mitigating Air Quality Impacts.* March 19, 2015.
- San Joaquin Valley Air Pollution Control District (SJVAPCD), *District Air Quality Plans and Related Reports, Particulate Matter, and Ozone*, 2003.
- San Joaquin Valley Air Pollution Control District (SJVAPCD), *Ambient Air Quality Standards and Valley Attainment Status,* 2005.
- San Joaquin Valley Air Pollution Control District (SJVAPCD), Zero Equivalency Policy for Greenhouse Gases, March 24, 2010, Revised January 24, 2012.
- San Joaquin County, Draft Airport Land Use Compatibility Plan, 2008.
- San Joaquin County, General Plan
- San Joaquin County, Municipal / Development Code
- San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP).
- State of California, Department of Conservation, Division of Land Resource Protection. Farmland Mapping and Monitoring Program. *San Joaquin County Important Farmland 2014*. Accessed September 23, 2018 at ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2014/sjq14.pdf
- United State Geological Survey, 2015, 7.5' Topographic Map of Lodi North, California, Quadrangle.
- United State Geological Survey, 2015, 7.5' Topographic Map of Lodi South, California, Quadrangle.
- United States, Environmental Protection Agency, *EnviroMapper for Superfund*. Available online at http://www2.epa.gov/emefdata/em4ef.home
- U.S. Department of Transportation, Federal Highway Administration. *The National Scenic Byways Program*. Available online at http://www.fhwa.dot.gov/byways/

15. REPORT PREPARATION

LEAD AGENCY:

Lodi Unified School District
Leonard Kahn, Chief Business Officer

CONSULTANTS:

Petralogix Engineering, Inc. (Report Authors)
Daniel E. Kramer, President/CEO, Principal Geologist, PG, CEG, PGp
Tonya R. Scheftner, Project Geologist, GIT
Cheyne Hirota, Staff Geologist

K.D. Anderson & Associates, Inc. (Traffic Impact Assessment)
Kenneth Anderson, Principal Engineer

Petralogix Engineering, Inc. (Phase I Environmental Site Assessment)
Daniel E. Kramer, President/CEO, Principal Geologist, PG, CEG, PGp
Tonya R. Scheftner, Project Geologist, GIT

Moore Biological Consultants (Biological Resources)
Diane S. Moore, M.S., Principal Biologist

Mid Pacific Engineering (Preliminary Geotech/Geohazard)
Todd Kaminsky, PE, GE, President
Dan Smith, PE, GE, Senior Geotechnical Engineer

PBK
Gary Gery, Principal Architect
Jessica Edwardson, Project Architect
Jeff Johnson, Senior Project Architect
Kim Johnson, Senior Project Architect

Roebbelen
Shawn Strohman, CCM Senior Construction Manager