



Public Review Draft

**Initial Study/
Mitigated Negative Declaration**

For the

**Elkhorn School – Measure U Modernization,
Reconfiguration, and Repairs Project**

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

Prepared by
Petralogix Engineering, Inc.
Lodi, CA 95240

**NOTICE OF AVAILABILITY AND NOTICE OF INTENT
TO ADOPT A MITIGATED NEGATIVE DECLARATION FOR THE
LODI UNIFIED SCHOOL DISTRICT
ELKHORN SCHOOL – MEASURE U MODERNIZATION, RECONFIGURATION, AND
REPAIRS 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 Elkhorn School – Measure U Modernization, Reconfiguration, and Repairs 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: 68585-295

PROJECT TITLE: ELKHORN SCHOOL – MEASURE U MODERNIZATION, RECONFIGURATION, AND REPAIRS PROJECT

PROJECT LOCATION: The Project is located at the Elkhorn Elementary School campus in the City of Stockton, San Joaquin County, approximately 1.75 miles east of Interstate 5. The Elkhorn Elementary School is located in a primarily suburban area, adjacent to Davis Road. The Elkhorn Elementary School address is 10505 Davis Road (APN: 070-070-15), Stockton, California, and consists of 5.09 acres of campus encompassing several single-story buildings labeled Building A through Building F. These buildings serve as Classroom Buildings for grades 4-8, Multi-purpose rooms, Library/Media Center, Administrative Offices, and Outdoor Areas. The campus includes a baseball diamond, field, track and field, and several basketball courts. There is a parking lot and parent drop-off. The City of Stockton 2040 General Plan designates the Elkhorn Elementary 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 (District) proposes to utilize Bond Measure U funding to modernize, reconfigure, and repair portions of the Elkhorn School campus, a grade 4–8 school serving approximately 270 students, located in Stockton, California. The project is not anticipated to increase student enrollment or staff capacity.

Key project components include:

- **New Classroom Building:**
A new single-story, approximately 10,000-square-foot classroom building will be constructed in the northwest portion of the campus, extending into the current grass lawn and baseball diamond area. The new building will accommodate seven classrooms and multiple support spaces, and will connect to a new learning commons, student quad, play apparatus, and shade structure.

- **Modernization/Renovation of Existing Buildings:**
Classrooms in Buildings A and D (located in the north-northeast portion of the campus) will be modernized. Work will include wall repairs, window and door replacement, floor and ceiling repairs, patching and painting of interior and exterior surfaces, roofing replacement, new interior lighting and controls, electrical wiring and outlet upgrades, plumbing system improvements, and removal of remaining asbestos-containing materials.
- **Reconfiguration for Administration and Library Facilities:**
Existing classrooms in Building F (southern portion of the campus) will be reconfigured to accommodate a new administration office, library, and entry plaza. This work will also include asbestos abatement in both the former classrooms and staff restrooms.
- **Site Access and Parking Improvements:**
The existing access road along the northeast boundary will be resurfaced and repaired, extending into a fire lane servicing the new classroom building. The existing parking lot south of the main campus structures will undergo repairs, slurry coating, and restriping, with the addition of a "Right-Turn Only" sign at the lot exit.
- **Demolition and Landscaping:**
Building C (located west of the bus drop-off area) will be demolished and replaced with a landscaped learning commons. Building B is proposed either for demolition and replacement with landscaping or for renovation, pending final determination.
- **Utility and Site Infrastructure:**
Additional improvements include underground utility construction, new landscaping, and exterior flatwork. Specific locations for utility trenching have not yet been determined.

All construction activities will be completed in phases to minimize disruption to campus operations.

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 **Monday, August 18, 2025** and ending on **Thursday, September 18, 2025**. Copies of the Draft Negative Declaration are available for review at the following location:

- **Lodi Unified School District**, 880 N. Guild Ave, Lodi, CA 95240; and
- **Online at** www.lodiUSD.net/about/projects#facilities

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 Thursday, September 18, 2025**, to the following address and email:

Daniel Kramer
Petralogix Engineering, Inc.
26675 Bruella Road
Galt, CA 95632
dkramer@petralogix.com

A public hearing to receive comments will be held at Lodi Unified School District. This meeting is scheduled for Tuesday September 2, 2025 at 7:00 p.m. in the James Areida Education Board Room at 1305 E. Vine Street, Lodi.


Edith Holbert, Executive Director of Operations

Date



TABLE OF CONTENTS

1.	Project Title.....	7
2.	Lead Agency Name and Address	7
3.	Contact Persons	7
4.	Project Location.....	7
5.	Project Sponsor's Name and Address	7
6.	Project Description.....	7
7.	Surrounding Land Uses and Setting	8
8.	Necessary Public Agency Approvals.....	8
9.	Environmental Factors Potentially Affected.....	14
10.	Environmental Determination.....	14
11.	Environmental Checklist	15
I.	Aesthetics	15
II.	Agricultural Resources	16
III.	Air Quality	17
IV.	Greenhouse Gas Emissions	24
V.	Biological Resources	27
VI.	Cultural Resources	31
VII.	Energy	34
VIII.	Geology and Soils	35
IX.	Hazards and Hazardous Materials	40
X.	Hydrology and Water Quality	46
XI.	Land Use and Planning	48
XII.	Mineral Resources	49
XIII.	Noise	50
XIV.	Population and Housing	52
XV.	Public Services	53
XVI.	Recreation	54
XVII.	Transportation/Traffic	55
	Tribal Cultural Resources	58
XVIII.	Utilities and Service Systems	61
XX.	Wildfire	62
XIX.	Mandatory Findings of Significance	63
12.	Summary of mitigation measures.....	64
13.	DOCUMENTS REFERENCED	69
14.	Report Preparation	71

LIST OF EXIBITS

Figure 1: Regional Map.....	11
Figure 2: Campus Map.....	12
Figure 3: Lodi High School Project Extent Map	13
Figure 4: 3D Rendering of Two-Story Classrooms	Error! Bookmark not defined.
Figure 5: Existing Site Plan	Error! Bookmark not defined.
Figure 6: Proposed Site Plan	58

APPENDIX A – CalEEMod Air Emissions Analysis

APPENDIX B – Biological Resources Study
APPENDIX C – Historical Evaluation Letter
APPENDIX D – Cultural Resources Investigation
APPENDIX E – Geotechnical Engineering Report
APPENDIX F – Phase I ESA

1. PROJECT TITLE

Elkhorn School – Measure U Modernization, Reconfiguration, and Repairs Project

2. LEAD AGENCY NAME AND ADDRESS

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

3. CONTACT PERSONS

Edith Holbert: 209-331-7121

4. PROJECT LOCATION

The Project is located at the Elkhorn Elementary School campus in the City of Stockton, San Joaquin County, approximately 1.75 miles east of Interstate 5. The Elkhorn Elementary School is located in a primarily suburban area, adjacent to Davis Road. The Elkhorn Elementary School address is 10505 Davis Road (APN: 070-070-15), Stockton, California, and consists of 5.09 acres of campus encompassing several single-story buildings labeled Building A through Building F. These buildings serve as Classroom Buildings for grades 4-8, Multi-purpose rooms, Library/Media Center, Administrative Offices, and Outdoor Areas. The campus includes a baseball diamond, field, track and field, and several basketball courts. There is a parking lot and parent drop-off. The City of Stockton 2040 General Plan designates the Elkhorn Elementary 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 (District) proposes to utilize Bond Measure U funding to modernize, reconfigure, and repair portions of the Elkhorn School campus, a grade 4–8 school serving approximately 270 students, located in Stockton, California. The project is not anticipated to increase student enrollment or staff capacity.

Key project components include:

- **New Classroom Building:**

A new single-story, approximately 12,000-square-foot classroom building will be constructed in the northwest portion of the campus, extending into the current grass lawn and baseball diamond area. The new building will accommodate seven classrooms and multiple support spaces, and will connect to a new learning commons, student quad, play apparatus, and shade structure.

- **Modernization/Renovation of Existing Buildings:**
Classrooms in Buildings A and D (located in the north-northeast portion of the campus) will be modernized. Work will include wall repairs, window and door replacement, floor and ceiling repairs, patching and painting of interior and exterior surfaces, roofing replacement, new interior lighting and controls, electrical wiring and outlet upgrades, plumbing system improvements, and removal of remaining asbestos-containing materials.
- **Reconfiguration for Administration and Library Facilities:**
Existing classrooms in Building F (southern portion of the campus) will be reconfigured to accommodate a new administration office, library, and entry plaza. This work will also include asbestos abatement in both the former classrooms and staff restrooms.
- **Site Access and Parking Improvements:**
The existing access road along the northeast boundary will be resurfaced and repaired, extending into a fire lane servicing the new classroom building. The existing parking lot south of the main campus structures will undergo repairs, slurry coating, and restriping, with the addition of a "Right-Turn Only" sign at the lot exit.
- **Demolition and Landscaping:**
Building C (located west of the bus drop-off area) will be demolished and replaced with a landscaped learning commons. Building B is proposed either for demolition and replacement with landscaping or for renovation, pending final determination.
- **Utility and Site Infrastructure:**
Additional improvements include underground utility construction, new landscaping, and exterior flatwork. Specific locations for utility trenching have not yet been determined.

All construction activities will be completed in phases to minimize disruption to campus operations.

7. SURROUNDING LAND USES AND SETTING

The proposed Project consists of several noncontiguous 'postage stamp' areas located within the Elkhorn Elementary campus. To the north of Elkhorn Elementary is a church followed by residential homes followed by Bear Creek. To the east is Davis Road, followed by residential homes and a golf course. A residential housing is located south and west of the proposed Project. The surrounding area is primarily designated Low Density Residential, per the City of Stockton 2040 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 Stockton: Preparation of a SWPPP to County of San Joaquin (and City of Stockton) standards. Pollutant Discharge Elimination Permit issued by the County of San Joaquin (and the City of Stockton).

9. PROJECT CONSTRUCTION

Project construction is expected to begin by September 2026 and will be completed in four phases. Phase 1: Modular Building and Site Work, Phase 2: Modernization Buildings A & F, Phase 3: Modernization Building D, and Phase 4: Demolition Buildings B & C. Site construction is anticipated to be completed in September 2028. Construction will likely consist of single-story classrooms with a conventional foundation system, with a concrete slab-on-grade ground floor. The new construction in the northern portion of the site, including the new classrooms, learning commons, shade structure, and fire lane is estimated to have an approximately 61,000 square foot footprint. The new construction (classrooms) within this area is currently estimated with a footprint of approximately 8,500 square feet out of 61,000. Other construction activity includes the modernization of buildings and the resurfacing of the parking lot.

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 over-excavated and replaced with properly moisture conditions and compacted engineered fill to promote more uniform support for the planned slab-on-grade structures, foundations, pavements, concrete flatwork, and associated improvements (MPE, 2025). 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 Stockton 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 Stockton.

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 – Elkhorn Elementary 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
☒	Biological Resources	☒	Cultural Resources	☐	Energy
☐	Geology/Soils	☒	Greenhouse Gas Emissions	☒	Hazards & Hazardous Materials
☐	Hydrology/Water Quality	☐	Land Use/Planning	☐	Mineral Resources
☐	Noise	☐	Population/Housing	☐	Public Services
☐	Recreation	☐	Transportation	☒	Tribal Cultural Resources
☐	Utilities/Service Systems	☐	Wildfire		
☒	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.

Edith Holbert, Executive Director of Operations

Date

12. ENVIRONMENTAL CHECKLIST

I. Aesthetics

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<i>Would the Project:</i>				
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. In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
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) **No 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 visually blend and improve upon the campus aesthetics. Therefore, this is a less than significant impact.
- d) **Less Than Significant Impact.** The Elkhorn Elementary construction, repairs and improvements will have the appropriate level of outdoor lighting for the convenience and security of the public during any nighttime activities. 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.

II. Agricultural Resources

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<i>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:</i>				
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, 2022, 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
<i>Would the Project:</i>				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b. Result in a cumulative 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?	☐	☒	☐	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	☒

The proposed Project site is located in the City of Stockton 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 NO_x 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, PM₁₀, 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 PM₁₀ 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
<i>Source: SJVAPCD, March 2015.</i>		

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 2022.1.3 impact calculator. A CalEEMod analysis was conducted by Petralogix Engineering, Inc (Petralogix, 2025) using the following project characteristics: Elementary School Land Use, 17,000 square feet (construction and demo buildings); Climate Zone 2, 3.4 m/s Wind Speed, 31 days Precipitation Frequency, and Pacific Gas & Electric 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 (PM₁₀) 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. The proposed Project includes the removal of up to approximately 7,000 square feet of current "permanent" classroom space and approximately 10,000 square feet of new construction.

The California Emissions Estimator Model (CalEEMod) was used to estimate the long term operational emissions using the proposed 17,000 square feet of new construction. This is a

conservative estimate considering approximately 7,000 square feet of buildings to be remodeled already exist on the campus. Detailed CalEEMod results are shown in **Appendix A**, 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	0.89	4.88	0.89	4.85
NO _x	10	0.75	4.12	0.75	4.12
CO	100	5.5	30.4	5.5	30.4
SO _x	27	0.01	0.08	0.01	0.08
PM ₁₀	15	1.23	6.76	1.23	6.76
PM _{2.5}	15	0.32	1.77	0.32	1.77
<i>Source: SJVAPCD, March 2015.</i>					

The proposed Project is roughly estimated to be fully operational at the end of September 2028. The first operational year for CalEEMod is 2028. 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. 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. 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 24 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 June 2026 and continue through June 2028, or approximately 24 months. Of the many emissions generated during this type of construction, however, PM₁₀ is the pollutant of greatest concern. PM₁₀ 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 PM₁₀ 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 A of this document, while a summary of the proposed Projects results for construction emissions is presented in the table below.

Table A-3. Peak 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	0.56	3.05	0.56	3.05
NO _x	10	4.63	25.3	4.63	25.3
CO	100	5.73	31.4	5.73	31.4
SO _x	27	0.01	0.06	0.01	0.06
PM ₁₀	15	1.36	7.44	0.67	3.66
PM _{2.5}	15	0.65	3.55	0.36	1.98

Source: SJVAPCD, March 2015.

The peak emission levels reported for 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 track out of soil materials on a daily basis unless it extends more than 50 feet from site; carryout and track out 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 will have four phases and is scheduled to begin September 2026 with construction activities concluding by the end of September 2028, or approximately 24 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.

IV. Greenhouse Gas Emissions

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<i>Would the Project:</i>				
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 (CO₂), methane (CH₄), and nitrous oxide (N₂O). 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 "CO₂-Equivalent" or CO₂E is used. Carbon dioxide equivalency (CO₂E) 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 1,033 metric tons per year of CO₂ equivalent. Neither the SJVAPCD nor the State has established a threshold of significance for GHG emissions from construction activities, however, the construction emissions will be in four distinct phases and short-term (approximately 24 months) and cease once completed.

The Project operational emissions would be approximately 1,373 MT of CO₂ equivalent unmitigated and 1,373 MT of CO₂ equivalent for mitigated emissions. 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.

The proposed Project's operational GHG emissions are not noticeably reduced, even with mitigation measures in place. It should be noted however, that several older less efficient

buildings on campus are being demolished and replaced with new classrooms, which will be significantly more efficient. Therefore, the project will have a less than significant impact to greenhouse gas emissions.

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 7,000 square feet of demolished structures, 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 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 Stockton. 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
<i>Would the proposal:</i>				
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, 2025).

Moore Biological Consultants utilized the California National Diversity Database (CNDDDB) 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 majority of the site is in areas already developed and consists of established parking lots and buildings. The proposed classrooms and quad area in the northwest part of the campus spans a developed area and a manicured lawn. The campus is small, surrounded by development, and biologically unremarkable. Although the project site is within a heavily developed area, there are a few open grassland areas, agricultural fields, and large trees in close proximity to the project site that could potentially support a few special-status species. Of the wildlife species identified in the CNDDDB search area, Swainson's hawk (*Buteo swainsoni*) and white-tailed kite (*Elanus leucurus*) are the only species with potential to occur in or near the project site on more than an occasional basis. (Moore Biological Consultants, 2025). 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. 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 CNDDDB search, Swainson's hawk and white-tailed kite are the only species that have 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 CNDDDB contains several records of Swainson's hawk nesting within one mile of the site, and several further from the site. Due to the relatively small size of the site, surrounding development, and location in an urban setting, it is unlikely Swainson's hawks forage in the small grassland areas in the site on more than an occasional basis; this species likely forages in larger

agricultural fields and grasslands in the project vicinity. The largest trees at the campus provide suitable nesting habitat for Swainson's hawks, but no raptor stick nests were observed in trees in the site during the recent survey and no hawks of any species were observed exhibiting territorial behavior.

White-tailed kite is a State of California Species of Concern but is not a listed species at the state or federal level. The MBTA and FGCC protect white-tailed kite year-round, as well as their nests during the nesting season; nesting for this species peaks from May to August. Nesting usually commences in the early-spring, concurrent with other resident Central Valley raptors, and most young fledge by early-July. The nearest occurrence of white-tailed kite in the CNDDDB (2025) search area is approximately 4 miles northwest of the site. No white-tailed kites were observed in the search area during the recent survey, which was conducted during the heart of the nesting period for this species. White-tailed kite may nest in trees in or near the site and may forage in the small grassland areas in the site and parcels further from the site (Moore Biological Consultants, 2025).

Giant garter snake is the only other special-status species located near the project site (CNDDDB, 2025). This record is from 1987 and there is no suitable habitat for this species in or immediately adjacent to the site.

Swainson's hawk and white-tailed kite could potentially nest in trees in or near the site. Raptors can be disturbed if loud and intensive construction activities occur in close proximity to their nests. Even though the site is in an urban setting, loud construction activities such as pavement grinding or jackhammering could result in disturbance to Swainson's hawks or white-tailed kite if any are nesting in or near the site (Moore Biological Consultants, 2025).

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, 2025).

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, 2025).

- 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, 2025). 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 were 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, 2025). 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 has no impact.
- e) **Less Than Significant Impact.** The proposed Project may result in the removal of some ornamental trees and shrubs. City Municipal Code Chapter 16.130 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 Stockton 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 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
<i>Would the Project:</i>				
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. Disturb any human remains, including those interred outside of formal cemeteries.	☐	☒	☐	☐

Solano Archeological Services (SAS) completed a Cultural Resources Study (February 2023) in support of environmental review of the proposed Project under CEQA (included as Appendix D). The investigation included a record search, literature review, historical society consultation, Native American consultation, and a field survey. The report findings are summarized below.

As discussed by SAS (February 2023), the Project is located within the boundaries of the Elkhorn Elementary campus. A review of historical aerial photography shows that no development other than at least one of the current-day school buildings was in place in the project area, with adjacent areas devoted to agriculture subsequently developed for residential. No other notable developments appear to have occurred within or adjacent to the project area. Archival research and an intensive field survey did not identify any prehistoric or historic-period cultural resources within the project area. However, two finds of prehistoric archaeological materials and human remains have been documented in the vicinity, and immediately adjacent to the project area. These findings indicate that the project area may be highly sensitive for containing traces of early Native American habitation, activities, and human internments.

The proposed Project includes the demolition of up to two buildings, both at least 45 years in age. The Lodi Unified School District therefore requires an Historic Resource Evaluation to determine if any of the buildings within the Project Area are considered historical resources and to provide recommendations, if warranted. Brunzell Historical was contracted to complete a Historic Resource Evaluation (HRE) for the Project Site (February 2023). The HRE is available for review in Appendix C.

a) **Less than Significant.** Brunzell Historical conducted a search of the National Register of Historic Places and the California Register of Historical Resources. The evaluation 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. No prehistoric or historic-era sites, features, or artifacts were noted within or adjacent to the Project Area. Therefore, there is a low to moderate potential that prehistoric resources and/or historic cultural resources could be encountered during ground-disturbance activities. However, two findings of prehistoric archaeological materials and human remains have been documented in the vicinity, and immediately adjacent to the Project Area. **These findings indicate the project area may be highly sensitive for containing traces of early Native American habitation, activities, and**

human interments. Implementation of **Mitigation Measure CR-1 and Mitigation Measure CR-2** 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 the qualified archaeologist to assess the situation, consult with agencies as appropriate, and make recommendations regarding the treatment of the discovery. Impacts on 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. **Given nearby discoveries of Native American human remains in the immediate vicinity of the Project Area, SAS recommends archaeological monitoring of the Project ground-disturbing activities.** 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

The ground-disturbing activities shall be monitored by a qualified archaeologist. Any human remains encountered during Project ground-disturbing activities should be treated in accordance with California Health and Safety Code 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.

VII. Energy

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project or construction operation?	☐	☐	☒	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Setting:

Energy resources in California include electricity from renewable and non-renewable forms, natural gas, and petroleum.

- a) **No Impact.** Energy consumption will not be wasteful, inefficient, or unnecessary. Construction energy consumption is associated with construction equipment and vehicles. The proposed Project will require construction equipment and vehicles to limit idling time. Therefore, fuel consumption associated with the proposed Project would not result in inefficient, wasteful, or unnecessary consumption of energy resources during Project construction. This is considered a **less than significant impact**.
- b) **Less than Significant Impact.** The new construction and upgraded facilities will increase energy efficiency at the Site. This is a **less than significant impact**.

VIII. Geology and Soils

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<i>Would the Project:</i>				
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?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

Mid Pacific Engineering, Inc. (MPE) completed a *Geologic Hazards Desktop Study* (GHZ) dated June 6, 2025, (included in Appendix E), for the proposed Elkhorn Elementary School project report. This GHZ 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, b) 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, 2023).

The following table contains California Geologic Survey (CGS) Class A and Class B fault systems and fault rupture segments 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 6.5 or greater.

Table G-1. Faults and Fault Rupture Segments Influential to Elkhorn Elementary School Site

Fault Name	Maximum Magnitude (M_w)	Distance to Site Miles (km)
Great Valley Fault System (Segment 7)	6.9	24.2 (38.9)
Great Valley Fault System (Segment 5)	6.7	28.0 (45.1)
Greenville Connected	7.0	29.3 (47.1)
Great Valley Fault System (Segment 4b)	6.8	37.2 (59.9)
Mount Diablo Thrust	6.7	34.7 (55.9)
Green Valley Connected	6.8	37.3 (60.0)
Calaveras CN	6.9	40.1 (64.6)
Calaveras CN+CC+CS	7.0	40.1 (64.6)
Calaveras CN+CC	7.0	40.1 (64.6)
Great Valley Fault System (Segment 4a)	6.6	49.1 (79.0)
Great Valley Fault System (Segment 8)	6.8	43.6 (70.2)
West Napa	6.7	50.3 (80.9)
Hayward-Rodgers Creek HS	6.8	48.0 (77.3)
Hayward-Rodgers Creek HN+HS	7.0	48.0 (77.3)
Hayward-Rodgers Creek RC +HN+HS	7.3	48.0 (77.3)
Hunting Creek-Berryessa	7.1	54.6 (87.8)
Hayward-Rodgers Creek HN	6.6	50.5 (81.2)
Hayward-Rodgers Creek RC+HN	7.2	50.5 (81.2)
Calaveras CC	6.4	49.2 (79.1)
Calaveras CC+CS	6.5	49.2 (79.1)
Great Valley Fault System (Segment 3)	7.1	58.8 (94.6)
Ortogonalita	7.1	53.9 (86.7)

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

- c). **Less than Significant with Mitigation Incorporated.** In general, strong ground shaking from an earthquake is the cause of 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 0.39g, a relatively moderate value (MPE, 2023). Design of the structure(s) in conformance with the most recent editions of the California Building Code should be sufficient to prevent significant damage from ground shaking during seismic events resulting from movement on any of the faults or fault systems discussed above.

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**.

- c) **Less than Significant Impact with Mitigation Incorporated.** 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 mapped to be within Holocene and/or Upper Pleistocene alluvium of Calaveras River; historical depth to groundwater is as shallow as 30 feet below ground surface (bgs); and the Site PGA_m is determined to be 0.39g. The project site is not located within an Earthquake Fault Zone, or designated seismic hazard zone; therefore, a site-specific ground motion analysis is not warranted. However, the design structure in conformance with the 2022 editions of the California Building Code (Title 24 of the California Code of Regulations, Chapter 16A) should be sufficient to prevent significant damage from ground shaking during seismic events resulting from movement on any of the faults or fault systems discussed in this report. (MPE, 2025).

MPE encountered groundwater at depths of approximately 25 feet and 27 feet below the ground surface in the two CPT soundings performed at the project site (MPE, 2025). Liquefaction may occur in thin sand layers encountered at depths below 25 feet bgs.

During the CPT soundings, depths to liquifiable layers were encountered deeper than 25 feet bgs. Considering the depths to liquefiable soils are deeper than 25 feet bgs and the fact that liquefiable soils are thin layers and overlaid by non-liquefiable clays. Loss of bearing capacity of the foundations and surface manifestation of the liquefaction are not anticipated (MPE, 2025). 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.

c) **Less than Significant.**

- i. **Less than Significant Impact.** The Project will be subject to the San Joaquin County Grading and Excavation regulations detailed in Division 14 of Title 9 of the San Joaquin County Code. Therefore, there will be a less than significant impact for soil erosion, or the loss of topsoil.
- ii. **Less than Significant Impact.** The on-site surface and near-surface soils primarily consist of clays to a depth of 1 foot to 4 feet bgs, underlain by interbedded layers of silty sands, poorly graded sands, sandy silts and clays to depths of approximately 34 to 44 feet bgs. The on-site soils are suitable for use as engineered fill, provided they are free of debris and organics and are at a suitable moisture content to achieve the desired degree of compaction. On-site clays should not be used within 12 inches from the finished building pad or exterior flatwork subgrades unless treated with lime to lower their expansion potential (MPE, 2025).

Lateral spreading usually occurs on gently sloping ground exposed to a slope. Based on the anticipated grading (essentially level site topography), MPE's opinion is that the potential for lateral spreading is low (MPE, 2025).

The site is not located in a Landslide Hazard Zone as designated by the State of California. Considering the essentially flat topography, the potential for development of landslides or slope instability is low (MPE, 2025).

Considering the subsurface soil conditions and the historical and current depths to the groundwater, hydro collapse of soils beneath the site is not anticipated (MPE, 2025).

- d) **Less than Significant Impact.** The Geotechnical Engineering Report performed by MPE indicates that in general native soils encountered in the test borings predominantly consist of clays to depths of approximately 1 foot to 4 feet bgs, underlain by interbedded layers of silty sands, poorly graded sands, sandy silts and clays to depths of approximately 34 to 44 feet bgs. The borings generally exposed soils consisting of medium to high expansion soils. The on-site soils will be suitable for use as engineered fill if the materials are at a workable moisture content and free of rubbish, debris and concentrations of organics, and have a maximum particle size of three inches or less. Clays should not be used within the upper 12 inches of building pad or exterior flatwork

fills, unless they are lime-treated to lower their expansion potential (MPE, 2025). This is a less than significant impact

- e) **No Impact.** The proposed Project will not require a new septic system. No significant impact.
- f) **No Impact.** No known unique paleontological resource or site or unique geologic feature will be impacted by the Proposed Project.

IX. Hazards and Hazardous Materials

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<i>Would the Project:</i>				
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 or excessive noise for people residing or working in the Project area?	☐	☐	☒	☐
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g. 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. Key project components include a new single-story classroom building to be constructed in the northwest portion of the campus, modernization/renovation of classrooms in Buildings A and D (located in the north-northeast portion of the campus, reconfiguration of existing classrooms in Building F (southern portion of the campus buildings), demolition of Building C (located west of the bus drop-off area), site access and parking improvements, and additional improvements including underground utility construction, new landscaping, and exterior flatwork. The proposed school repairs and improvements are intended to service the current student body and faculty attending Elkhorn Elementary 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. 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. One location was identified by Seth Lane of SJVAPD via email correspondence received on June 26, 2025, indicating there is one facility subject to District permit requirements that is located within ¼ miles of the project identified as Elkhorn Golf Club at 1050 Elkhorn Drive. The golf course does not generate hazardous emissions that would pose a significant threat to public health or environment. Routine operations associated with golf courses-such as turf maintenance, irrigation, and landscaping-primarily involve the use of standard groundskeeping equipment and landscape fertilizers. These activities do not emit substantial quantities of air pollutants identified as hazardous under state or federal air quality standards.

- d) **Less Than Significant Impact with Mitigation Incorporated.** The project takes place within the boundary of the Elkhorn Elementary campus grounds. The project is not included in any hazardous materials sites compiled pursuant to Government Code Section 65962.5. In addition, the San Joaquin County Environmental Health Department (EMD) was

contacted to determine whether any records were on file at the agency in connection to 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 Elkhorn Elementary school address (10505 Davis Road) 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 June 2, 2025 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 F.

The available SJCEHD and EDR records reviewed indicate the Elkhorn Elementary is identified in multiple environmental databases, including EnviroStor, ECHO, RCRA NonGen/NLR, CERS, and the DTSC hazardous waste manifest tracking systems (HWTS, HAZNET, E-Manifest). These listings reflect prior regulatory compliance activities, such as the removal and lawful disposal of asbestos-containing materials during demolition, and maintenance-related hazardous materials reporting under CERS. The site does not appear on the Cortese List of open hazardous materials cleanup sites requiring remediation.

The Phase I ESA prepared for the project site identified historical agricultural operations. Based on historical aerial imagery, the site was likely used for crop production during a period when organochlorine pesticides and other persistent chemicals such as DDT, chlordane, and toxaphene were commonly applied. These compounds are no longer approved for use due to their toxicity, long environmental half-life, and tendency to bioaccumulate in humans and wildlife. The Phase I ESA recommended subsurface soil sampling to assess whether residues of these legacy pesticides remain in site soils.

The Phase I additionally concluded the historic structures planned for demolition and/or modernization, are a concern for the project site. The historic on-site structures were built prior the effect ban of asbestos containing building materials and lead paints and products. Therefore, the potential for lead-based paints and asbestos located in the former structure locations is considered moderate to high. Based on the age of historic structures, potential contaminated soil near building foundations where termiticide application may have occurred is an environmental concern for the site, in addition, there is a potential for polychlorinated biphenyls (PCBs) in soil from the weathering of window caulking. Therefore, the historic structures are considered environmental concerns for potential contaminated soil near building foundations where past termiticide may have occurred, potential lead in soil from weathering of lead-based paint, and potential polychlorinated biphenyls (PCBs) in soil from weathering of window caulking. The Phase I ESA recommended subsurface soil sampling to assess whether these potential contaminants of concern have impacted the project site. At the time of reporting, the District was planning to perform a limited site investigation and was planning to coordinate with the Department of Toxic Substances Control (DTSC), if required.

Pipelines

A Gas Distribution Map was provided by PG&E which shows a gas distribution main that trends north-south on the eastern side of Davis Road. This gas distribution main feeds a low-pressure service main that cuts west across Davis Road towards the northeast portion of the Elkhorn Campus. A gas service line (steel) is shown on the map in the northeast portion 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 gas 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

An Electric Distribution Map was provided by Pacific Gas & Electric (PG&E). There is one overhead primary transmission line located adjacent to the northeastern boundary and of the school campus of medium voltage 12 kV (12,000 volts). The overhead powerline trends northwest across the northeast portion of the school. Any work conducted near the transmission line will be in conformance with power line safety laws/regulations. PG&E does have a transmission line which trends north-south along the eastern perimeter of the campus, however, the transmission line is not within the project area. 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 June 26, 2025, there are no railways located within one-quarter mile of the site. Based on review of aerial photographs provided by Google Earth and the 2018 *United States Geological Survey (USGS) 7.5-Minute Series Topographic Map, Lodi South Quadrangle, California* map, there are railroad tracks within one-half mile 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 hornblende) 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**.

There are several Elkhorn Elementary school buildings slated for demolition which 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) **Less Than Significant 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 South, 2018), the nearest runway is the Lodi Airpark, located approximately 2.5 miles northeast of the project site. The next closest airport is Kingdon airport, located approximately 2.75 miles northwest of the site. The buildings planned for construction are single-story and will not require any notification to the Federal Aviation Administration. Therefore, this has **no impact** on the site.

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 Elkhorn Elementary 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. **Less than significant impact is expected.**

g) **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.

X. Hydrology and Water Quality

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

The construction will take place on Lodi Unified School District owned land, within the boundaries of the Elkhorn Elementary 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 1.5 acres where the new classrooms and fire lane/access road portion of the site are anticipated, 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 Stockton municipal well. water utility services. The project is not facilitating growth, therefore, impacts to groundwater supplies will be **less than significant**.
- c) **Less Than Significant Impact.** The Project is proposed to occur within the developed Elkhorn Elementary campus property. No streams are located near the project site, therefore, there will be no alterations of stream courses. The campus is located on relatively flat topography. The site development will consist of the demolition of up to two buildings, removal of vegetation, grading, demolition of permanent classrooms, and new construction including a new single-story in the northwest portion of the campus. A total footprint for the school repair and improvements are anticipated to be approximately 2.5 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**.
- d) **Less than Significant 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) 06077C0315F, 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 a less than significant impact.
- e) **No Impact.** The project will not conflict or obstruct implementation of a water quality control plan or sustainable management plan.

XI. Land Use and Planning

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<i>Would the Project:</i>				
a. Physically divide an established community?	☐	☐	☐	☒
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating on environmental effect?	☐	☐	☐	☒

a) **No Impact.** The project would be located within the parcel boundary of the established Elkhorn Elementary 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 Stockton's 2040 General Plan designates the Elkhorn Elementary School as "Public/Quasi-Public". The Project involves the proposed repair/improvements as well as new campus classrooms within the 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**.

XII. 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?	☐	☐	☐	☒

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

XIII. Noise

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b. Generation of excessive ground borne vibration or ground borne noise levels?	☐	☐	☒	☐
c. For a Project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?	☐	☐	☐	☒

Regulatory Setting

The City of Stockton 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 Elkhorn Elementary 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 south and west, as well the residences east following Davis Road.

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 west of the Elkhorn Elementary 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 in the local general plan or noise ordinance will 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 have 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) **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. Therefore, there is no noise impact associated with the construction and/or operation of this project relative to private airports or airstrips.

XIV. Population and Housing

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less- Than- Significant Impact	No Impact
<i>Would the Project:</i>				
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 people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

- a-c) **No Impact.** The Project area is within Elkhorn Elementary School campus. The Project would not include the creation of new housing, nor would it 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.

XV. 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.** The Elkhorn School Modernization project would not result in significant impact to public services. The project does not increase staff or student enrollment. Construction will comply with safety standards and applicable codes, and any utility upgrades will be limited to on-site improvements. Therefore, the project will have **no impact**.

XVI. 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.**

XVII. Transportation/Traffic

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d. Result in inadequate emergency access?	☐	☐	☐	☒

The proposed Project is intended to improve Elkhorn Elementary School by the addition of a new 12,000 sq ft classroom building on the northwest portion of the site, a modernization of Classrooms in Buildings A and D on the north-northeast portion of the campus, and a reconfiguration of classrooms in Building F on the southern portion of campus into new administration and library facilities. Building C, and possibly Building B, will be demolished and replaced with a landscaped outdoor learning area. In addition to building modifications, the existing access road along the northeast boundary of the site will be resurfaced and repaired, extending into a fire lane servicing the new classroom building. The existing parking lot south of the main campus buildings will undergo repairs and upgrades, including slurry coating, restriping, and the addition of a "Right-Turn Only sign" at the lot exit. The Project intends only to modernize, reconfigure, and repair parts of the Elkhorn School campus and is not expected to increase student enrollment or staff capacity. Thus, the project is not anticipated to cause an increase in local traffic.

The *City of Stockton Transportation Impact Analysis Guidelines (2023)* outline criteria for whether a project requires a CEQA Vehicle Miles Travelled (VMT) analysis. Based on guidance from the *State of California's Office of Planning and Research (OPR) Technical Advisory (December 2018)*, land use projects that meet at least one of the following screening criteria are presumed to not require the CEQA VMT analysis:

- Transit Priority Areas
- Affordable Housing
- Small Projects
- Locally Serving Public Facility
- Neighborhood-Serving Retail Project
- Low VMT Area

A small project is defined as one generating 110 or fewer average daily vehicle trips, absent any substantial evidence indicating that a project would generate a potentially significant level of VMT. Such projects may include ~10,000 sq ft office space or ~15,000 sq ft industrial space. Because the proposed Project is a ~12,000 sq ft classroom and because the Project will not increase student enrollment or staff that would lead to an increase in VMT, the Project can be classified as a small project and satisfies this criterion.

Locally serving public facilities include neighborhood public schools. Because Elkhorn Elementary School is local public school within the Lodi Unified School District, the Project satisfies the criteria for being a Locally Serving Public Facility. According to the *2015 Stockton Model Map of Daily Home-Based-Work VMT per Employee Comparison to City Average*, the Project is also located within a TAZ that generates VMT at a rate at least 15% lower than the most recently established baseline VMT for office/employment uses. Thus, the Project satisfies the criteria for a Low VMT Area.

Because the Project meets three of the aforementioned criteria (small project, locally serving public facility, and low VMT area), the CEQA VMT analysis is not required. A formal traffic study and VMT analysis were not performed. The following guidance on Transportation/Traffic impact was conducted by evaluating site access and circulation and through review of the Transportation Elements of the General Plans for both the City of Stockton and San Joaquin County, as well as other documents available in the public record containing relevant information pertaining to the Project location and site.

a) Less Than Significant Impact

Because the Elkhorn Elementary School modernization is classified as a small project and will not increase student enrollment or staff that would lead to an increase in VMT, it is expected to generate less than 110 daily trips, if any, over the existing daily trip count to the school. Thus, the Project is a Tier 1 project, for which the transportation analysis only requires a site plan review, circulation evaluation, and assessment of site integration with existing transportation systems.

The *San Joaquin County General Plan Public Facilities and Services Element, Transportation and Mobility* section lists the Transportation and Mobility goals of the county, including program plans, ordinances, and policies addressing the circulation system, transit, roadway, bicycle and pedestrian facilities. The proposed Project does not conflict with any of these goals or measures. The project should, however, take care to consider the following goals and policies in the developments and improvements to the main access road on the northeast side of campus:

- Compliance with San Joaquin County's "Complete Streets" design goals.
- Compatibility with *Goal TM-3.3: Onsite Circulation Systems*: The County shall require new development to design on-site circulation systems and parking facilities to minimize backup on County roadways.
- Compatibility with *Goal TM-4.9: Parking Facility Design*: The County shall ensure that new automobile parking facilities are designed to facilitate safe and convenient pedestrian access, including clearly defined corridors and walkways connecting parking areas with buildings.
- Compatibility with *Goal TM-7.7: Truck Traffic Noise Minimization*: The County shall seek to minimize noise and other impacts of truck traffic, deliveries, and staging in residential neighborhoods. While the Project will not increase truck traffic long-term, temporary increases in truck traffic during the construction phase will take the appropriate steps to mitigate noise increases and disturbances to the surrounding residential area (see Noise section).

The Project is located in a suburban area between the Metropolitan centers of Lodi and Stockton, CA. The school site is not located at an intersection. Presently, traffic congestion associated with Elkhorn Elementary School is considered minor and would only be an issue during peak hours (morning drop-off and afternoon pick-up). According to the *San Joaquin*

County General Plan Public Facilities and Services Element and the *City of Stockton General Plan Transportation Element*, Davis Rd is functionally classified as Arterial, which are high-volume roadways designed to connect the regional roadway network to the local roadway network and generally serve between 20,000-50,000 vehicles/day, though some serve fewer than 20,000 vehicles/day. Davis Rd. near Elkhorn Elementary School would be classified as minor Arterial. Given that the proposed Project is not anticipated to increase vehicle trips beyond the construction phase, the Project would have no impact on Davis Rd's function as an Arterial roadway and is therefore consistent with the *General Plan* classification and does not alter the local circulation system.

Davis Rd. is also designated for a planned Class IV separated bikeway, in accordance with the *City of Stockton General Plan*. The improvements and modifications to Elkhorn Elementary School are not anticipated to impede the construction or routing of this bikeway. The Project can better support *City of Stockton Policy TR-3.2* by providing charging stations and parking for electric vehicles in the existing parking lot on the south side of campus, which will undergo repairs and upgrades. In general, the Project does not conflict with nor is anticipated to impact the circulation systems of the City of Stockton or San Joaquin County, including transit, roadway, bicycle and pedestrian facilities, as laid out in their *General Plans*. Thus, this is a **less than significant impact**.

b) **Less than Significant Impact**

CEQA Guidelines section 15064.3, subdivision (b) pertains to the *Criteria for Analyzing Transportation Impacts*. As stated above, because the Project meets three of the aforementioned criteria for relief from VMT analysis (small project, locally serving public facility, and low VMT area), the CEQA VMT analysis is not required. Additionally, in general, projects within one-half mile of a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Davis Rd. meets the criteria for such a corridor. Thus, this is a **less than significant impact**.

c) **No Impact**. The proposed Project does not include design features that would increase hazards or incompatible uses. The Project will include the construction of a new fire lane to service the new classroom building, which will actually serve to decrease hazard by providing adequate access for emergency vehicles to the new building. 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 **no impact**.

d) **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, access to the new building will be available via a fire lane extending from the existing access road on the northeast boundary of the campus. Therefore, the project would have **no impact** on emergency access.

Tribal Cultural Resources

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☒	☐	☐
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.	☐	☒	☐	☐

Tribal Cultural Resources are defined in CEQA as sites, features, places, cultural landscapes, sacred places, and objects of cultural value to a California Native American tribe listed or eligible for listing on the California Register of Historical Resources or included in a local register of historical resources. Solano Archaeological Services (SAS) completed a *Cultural Resources Investigation – Lodi Unified School District Elkhorn School Measure U Implementation Project* (February 2023) in support of environmental review of the proposed Project under CEQA (included as Appendix D).

Sacred Lands File Search

On January 18, 2023, on behalf of the LUSD SAS emailed a letter and a map depicting the Project area to the Native American Heritage Commission (NAHC). The letter requested a search of the NAHC Sacred Lands File (SLF) database for cultural resources within the Project area. As of the time of publication, SAS has not received any responses from the NAHC. When information is provided by the NAHC, SAS will prepare an addendum to the Study (Appendix D).

California Historical Resources Information System Records Search

According to SAS (2023), a records search conducted through the California Historical Resources Information System archival research (CCIC File No. 12419L) and an intensive field survey (February 2, 2023) of the entire project area did not identify any prehistoric-period or historic period resources within or adjacent to the project area. **Although located slightly outside of the project area, a reconnaissance survey was made of the southwestern portion of the parcel within which Elkhorn School is located due to the presence of a documented occurrence of prehistoric archaeological materials and human remains (CCIC resource No. 8067-01) immediately adjacent to the parcel boundary.** Archival research and an intensive field survey did not identify any prehistoric or historic-period cultural

resources within the project area. However, two finds of prehistoric archaeological materials and human remains have been documented in the vicinity, and immediately adjacent to the project area. Concerning historic period resources, historic mapping, aerial photographs, archival research, and the field survey indicate that no developments of any kind have occurred within the project area. Consequently, SAS proposes a low level of sensitivity for the project area to contain potentially significant historic-era sites, features, or artifacts. **However, given the findings of prehistoric archaeological materials and human remains documented in the vicinity and immediately adjacent to the project area, these findings indicate the project area may be in a highly sensitive for containing traces of early Native American habitation, activities, and human internments.**

Assembly Bill 52 Native American Consultation

Assembly Bill requires the lead agency to begin consultation with any California Native American tribe that is culturally and traditionally affiliated with the geographic area of the proposed Project if the California Native American tribe requested to the lead agency, in writing, to be informed by the lead agency through formal notification within 14 days of determining application complete or public agency's decision to undertake the Project. Upon formal notification, each California Native American tribe has 30 days to request consultation whereby the lead agency must initiate consultation within 30 days of the consultation request. On January 18, 2023, on behalf of the LUSD, SAS emailed a letter and a map depicting the Project area to the NAHC to introduce the project, and to request a list of Tribal Contacts as part of the AB 52 CEQA outreach efforts. No response has been received to date. If any substantive contacts are made with the other Native American Community regarding the proposed project, an addendum to the report may be developed if needed.

a) Less than Significant with Mitigation Incorporated.

i. Less than Significant with Mitigation Incorporated. The Central California Information Center (CCIC) (CCIC File No. 12419L) indicated that the School property had been documented as a cultural resource (Site No. P-39-004947) and that previous school buildings have been on the current site at least as early as 1901. As built environment resource (Site No. P-39-004947) was addressed in an architectural evaluation prepared by Brunzell Historical, LLC, of Napa, California and discussed in the Cultural Resources section. An intensive survey conducted by SAS did not identify any prehistoric or historic-era sites, features, or artifacts within the project area. SAS proposes a low-level sensitivity for the project area to contain potentially significant historic-era sites, features, or artifacts. However, impacts of the proposed Project construction relating to ground disturbance may potentially impact tribal cultural resources, therefore, in the event that archaeological resources are observed during Project construction-related activities, **Mitigation Measure CR-1 and Mitigation Measure CR-2** are in place to reduce impacts to a less than significant level.

ii. Less than Significant with Mitigation Incorporated. On behalf of Lodi Unified School District, SAS requested contact information for tribal organizations and representatives who may have knowledge of cultural resources in the Project area. No response has been received to date.

Given the nearby discoveries of Native American human remains in the immediate vicinity of the project area, SAS considers the project area to be highly sensitive for containing traces of early Native American habitation, activities, and human internments. The ground disturbance related to the proposed Project construction activities could damage previously unrecorded

buried tribal resources. **Given the nearby discoveries of Native American human remains, SAS recommends archaeological monitoring of project ground-disturbing activities.** If tribal resources are unearthed during Project activities, this would be considered a potentially significant impact; **Mitigation Measure CR-3** is in place to reduce impacts to a less than significant level.

XVIII. Utilities and Service Systems

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c. 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?	☐	☐	☒	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes, and regulations related to solid waste?	☐	☐	☒	☐

a,b) **Less Than Significant Impact.** The Elkhorn School Modernization project involves upgrades limited to the relocation or construction of new or expanded utility infrastructure within the existing school campus and is not intended to support increased student enrollment or expanded site usage that would require significant additional utility capacity. This is considered a **less than significant impact**.

c) **Less Than Significant Impact.** 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 impact is **less than significant**.

e) **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. There is no conflict with federal, state or local regulations. This is a **less than significant impact**.

XX. Wildfire

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire?	☐	☐	☐	☒
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

a-d) **No Impact.** The proposed Project will have no impact on impairment of an emergency or evacuation plan and would not impact Project occupants to exacerbate wildfire risks. There is **no impact**.

XIX. 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, white-tailed kite, 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 renovations and improvements are intended to service the current student body and faculty attending Elkhorn Elementary 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 ensure 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.

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, 2025).

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, 2025).

In addition to these mitigation measures, the City of Stockton 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 Lodi Unified School District (or its representative) shall consult with the qualified archaeologist to assess the situation, consult with agencies as appropriate, and make recommendations regarding the treatment of the discovery. Impacts on 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 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 3

The ground-disturbing activities shall be monitored by a qualified archaeologist. Any human remains encountered during Project ground-disturbing activities should be treated in accordance with California Health and Safety Code 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**.

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 in 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.

14. DOCUMENTS REFERENCED

- Alquist-Priolo Earthquake Fault Zoning Act (<http://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/>).
- 2025 California Environmental Quality Act Statute and Guidelines.
- California Department of Conservation (CDC), Division of Mines, *California Geological Survey - SMARA Mineral Land Classification Map 2025*. (<https://maps.conservation.ca.gov/mineralresources/>)
- California Department of Transportation, Scenic Highway Program. Updated 2025. Available Online at: <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>
- California Department of Conservation Important Farmland Finder. Accessed May 2, 2025. Available online at <http://www.conservation.ca.gov/dlrp/fmmp/>
- California Emissions Estimator Model (CalEEMod) User's Guide, September 2022.1.1.29. 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.
- California, State of, Water Resources Control Board. GeoTracker. 2025. Available online at <https://geotracker.waterboards.ca.gov/>
- Cortese list of Hazardous Waste and Substances Sites, <https://dtsc.ca.gov/dtscs-cortese-list/>, accessed online May 8, 2025.
- Department of Toxic Substances Control ENVIROSTOR Site, <https://www.envirostor.dtsc.ca.gov/public/>, accessed online April 30, 2025
- Environmental Protection Agency, Map of Radon Zones, California. 402-R-93-025, 1993.
- 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 0315F, Map Number 06077C0315F, San Joaquin County and Incorporated Areas, California.
- Mid Pacific Engineering, *Geologic Hazards and Geotechnical Engineering Report: Elkhorn Elementary Classroom Building and Remodeling Project, Stockton, California*. June 6, 2025.
- Moore Biological Consultants. *LUSD Elkhorn School Improvements Project*. San Joaquin County, California: Biological Resources Assessment. June 4, 2025.
- National Pipeline Mapping System. <https://www.npms.phmsa.dot.gov/> Accessed on April 30, 2025.
- 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 April 6, 2025.
- Petralogix Engineering, Inc. Elkhorn Elementary School Phase I. June 2, 2025.

- 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 April 23, 2025 at <https://www.conservation.ca.gov/dlrp/fmmp>
- United State Geological Survey, 2018, 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 <https://enviro.epa.gov/envirofacts/enviromapper/search>
- 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
Edith Holbert, Executive Director of Operations

CONSULTANTS:

Brunzell Historical, LLC
Kara Brunzell, Architectural Historian

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

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

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

Solano Archaeological Services, LLC (Cultural Resources Investigation)
Jason A. Coleman, M.A., R.P.A., Owner and Principal Investigator