AGENDA ITEM 1-05

CITY OF LODI
COUNCIL COMMUNICATION

TM

AGENDA TITLE: Housing Element Update, announcing the commencement of the public review of the proposed Housing Element and Draft Environmental Impact Report

MEETING DATE: December 17, 2003

PREPARED BY: J.D. Hightower, City Planner

RECOMMENDED ACTION: Announce the public review period for the Draft Housing Element Update and the Draft Environmental Impact Report starting December 22, 2003 and ending February 20, 2004.

BACKGROUND INFORMATION: Pursuant to the on-going contract with Cotton-Bridges Associates, the Draft Housing Element and associated Draft Environmental Impact Report are ready for public review. Our lead consultant, Jeff Goldman, will be making a brief presentation to overview the document and announce the beginning of public comment. Staff has reviewed both documents and we look forward to working with all stakeholders in this important housing plan. It is important to note that our Housing Element will be reviewed by the State Department of Housing and Community Development for compliance to state law. It is staff's opinion that this Housing Element complies with state law and that the environmental impacts associated with the housing program are evaluated properly.

FUNDING: None Required

Konradt Bartlam
Community Development Director

KB/JDH/lw

APPROVED: Dixon Flynn, City Manager

filed 12-17-03

MEMORANDUM, City of Lodi, Community Development Department

To: City Council

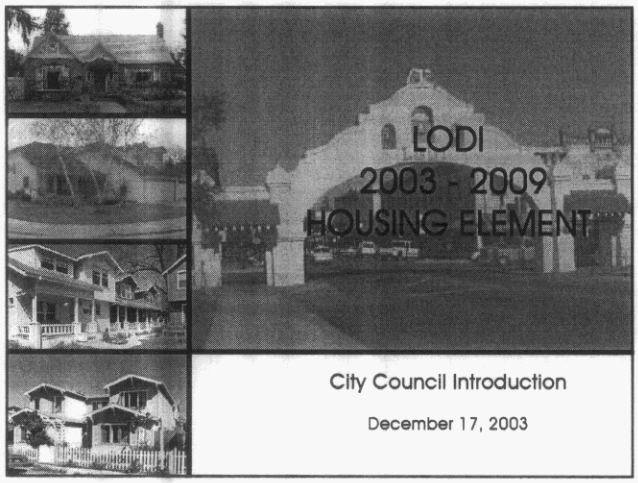
From: J.D. Hightower, City Planner

Date: December 16, 2003

Subject: DRAFT HOUSING ELEMENT AND E.I.R.

In front of you is the Draft Housing Element Update for the General Plan and its accompanying Draft Environmental Impact Report. Jeff Goldman, our consultant, will announce the public review period for the documents that will start on December 22, 2003. Staff will insure that copies are available at the Library and City Hall starting on that date. After reviewing the document, there will be further opportunities during the review period that is expected to run into late February, depending on state review. If you have any questions or comments concerning this important planning document, staff would be pleased to provide further information.

filed 12-17-03



City Council Introduction

December 17, 2003

Introduction to the 2003 – 2009 Housing Element

- Purpose
  - Introduce the updated Draft Housing Element
  - Review document contents
  - Discuss the next steps for public review, State review, and adoption
- Public Review Process
  - Begins on December 22 with release of the draft Housing Element and EIR
  - Public comments on the Housing Element will be accepted until State review is complete (late February)

LODI 2003 – 2009 HOUSING ELEMENT

Housing Element Contents

- Chapter I – Introduction
- Chapter II – Community Profile
- Chapter III – Resources/Constraints
- Chapter IV – Housing Strategy

LODI 2003 – 2009 HOUSING ELEMENT

Chapter I - Introduction

- Purpose and Contents
- Community Context
- State Requirements
- Data Sources and Use
- Housing Element Goals and Policies
- Public Participation
- General Plan Consistency

LODI 2003 – 2009 HOUSING ELEMENT

Chapter II – Community Profile

- Population/Household Characteristics
- Housing Stock Characteristics
- Employment Trends
- Special Housing Needs
- Assisted Rental Housing At-Risk
- Energy Conservation
- Future Housing Construction Needs

LODI 2003 – 2009 HOUSING ELEMENT

Chapter III – Resources/Constraints

- Land to Accommodate Housing Needs
- Administrative and Financial Resources
- Governmental Constraints
  - Zoning and Other Development Regulations
  - Permit Processes and Fees
  - Housing for Special Needs Groups
- Non-Governmental
  - Availability of Financing
  - Land and Construction Costs
  - Housing Discrimination Issues
- Environmental/Infrastructure
  - Water and Sewer Service
  - Other Public Facilities and Services
  - Environmental Conditions

LODI 2003 – 2009 HOUSING ELEMENT

Chapter IV – Housing Strategy

- Goals
  - Provide a range of housing types for all residents
  - Encourage rehabilitation of the City's existing housing stock
  - Ensure the provision of adequate public facilities and services for residential development
  - Promote equal housing opportunity
  - Encourage residential energy efficiency
- Policies
- Implementation Programs and Action Statements
  - Responsible agencies
  - Timeframes
  - Potential Funding
  - Program Objectives
- Overall Quantified Objectives

LODI 2003 – 2009 HOUSING ELEMENT

Lodi's Share of Regional Housing Needs (2001 – 2009)

Income Category	# of Units	$ Income Level
Very Low-Income	990	up to $25,300
Low-Income	664	$25,301 - $40,480
Moderate-Income	738	$40,481 - $60,720
Above Moderate-Income	1,622	$60,721+
Total:	4,014	
Annual Rate:	535	

* Based on the San Joaquin COG regional housing allocation plan. Median family income for San Joaquin County is $50,600 for a family of four.

LODI 2003 – 2009 HOUSING ELEMENT

Quantified Objectives

Income	Regional Share	New Construction	Homebuyer Assistance	Housing Rehab	Conserve Affordable Housing	
					Rental Housing	Mobile Homes
Very Low	990	150	5		40	400
Low	664	150	25			
Moderate	738	400	25		--	
Above Moderate	1,622	2,250	--		--	--
Total	4,014	2,700	50		40	400

LODI 2003 – 2009 HOUSING ELEMENT

Next Steps

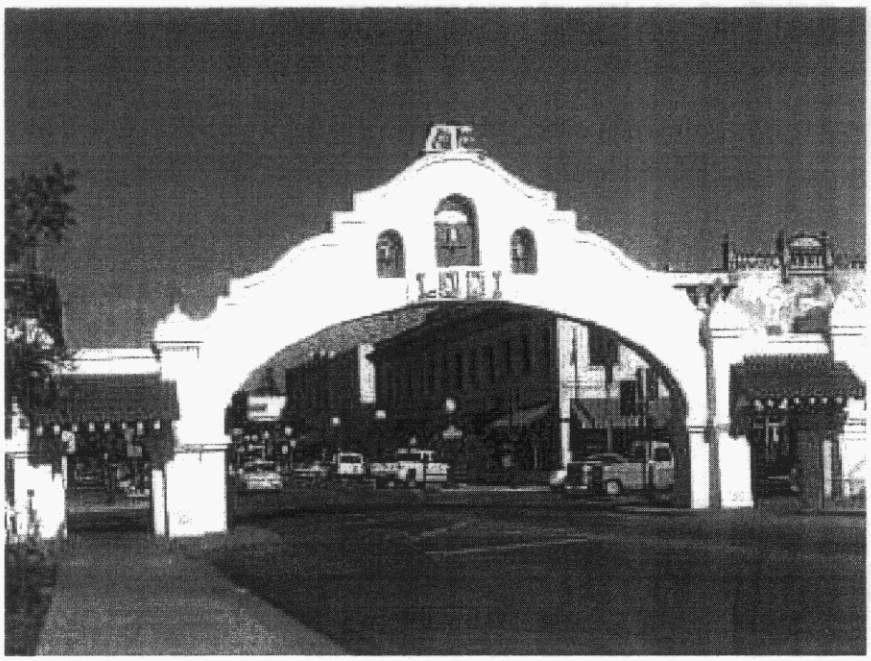
MILESTONE	DATE
Draft Housing Element available for public review	Dec '03
Submit Draft to State for review and comment	Dec '03
State comments to City (60-day review)	Feb '04
Adopt Housing Element	April '04
Submit Adopted Housing Element for State review (90 days)	April '04

LODI 2003 – 2009 HOUSING ELEMENT

filed 12-17-03

2003-2009 HOUSING ELEMENT

CITY OF LODI



Public Review Draft

November 2003

2003-2009 HOUSING ELEMENT

CITY OF LODI

Public Review Draft

November 2003

Prepared by:

Cotton/Bridges/Associates
A Division of P&D Consultants

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I. INTRODUCTION

A. Purpose and Contents

The Lodi Housing Element is part of the City's General Plan, a comprehensive policy statement regarding the physical, economic, and social development of the City; the preservation and conservation of natural and human features of the landscape, and the redevelopment and re-use of land and buildings within the City.

The Housing Element addresses one of the state-mandated topics and most basic human needs—shelter. For this reason the Housing Element represents a critical link between land use and transportation policies, which define the location, layout, and movement of people and goods, and environmental/resource policies. For a region to have a strong and balanced economy, where people live in proximity to where they work, workers must have places to live within their economic means. From the perspective of human needs, housing should be high on the hierarchy of policy priorities. Although housing represents a high priority, planning for housing must be balanced with the community's economic needs and environmental, resource, and open space protection policies, which are also essential aspects of the City's General Plan.

The Housing Element contains three parts in addition to this introduction: a community profile, an analysis of resources and constraints, and a housing strategy. The community profile contains an analysis of population housing, and employment characteristics and trends; the needs of special population groups such as seniors, large families, and persons with disabilities; indicators of unmet need, such as overcrowding, overpayment, substandard housing, and the potential loss of affordable rental housing; and future housing construction needs. The purpose of the community profile is to characterize existing conditions and unmet housing needs among Lodi's residents and to plan for future residents expected to reside in the City.

The second part of the Element provides an analysis of resources and constraints to meeting the housing needs identified in the community profile. Resources include the availability of land, public and private organizations that provide housing and supportive services, and funding to implement the City's housing strategy. Constraints include the impacts of government action on housing availability and affordability, the interaction of market forces, and environmental conditions. In this section of the Element, the analysis focuses on the magnitude of potential constraints and identifies potential mitigation measures to reduce the impacts of constraints.

The third part of the Housing Element contains the City's housing strategy—goals, policies, implementing actions, and quantified objectives to meet identified housing needs, reduce constraints, and make effective use of available resources. As part of its strategy, the Housing Element identifies the agencies responsible for implementing recommended actions, timeframes for actions, and the anticipated results.

B. Community Context

Throughout the past decade, Lodi experienced a moderate rate of population growth at a time when surrounding jurisdiction's populations were nearly doubling. The rate of growth in Lodi may have been influenced by efforts to retain the historic small town character and quality of life of the City. Lodi has historically served as a bedroom community, providing residential opportunities for employees of Stockton, Sacramento, and to a lesser extent, the East Bay Area.

Population growth in Lodi has been concentrated in children and people between the ages of 35 and 54 in the last decade. During a time when the population grew at a moderate rate, the average size of a family residing in Lodi increased significantly. The average family size in 2000 was 3.25 persons, which may be a contributing factor to the increase in overcrowding that Lodi experienced over the ten year period.

The City's economy is anchored in the manufacturing, retail, health care, and hospitality industries. Agriculture, although prominent, contributes less to the local economy than these sectors. Approximately 36 percent of Lodi residents are employed within the four industries mentioned above. A major factor in the local economy is the high percentage of Lodi residents (greater than 50 percent) who work outside the community. This high rate of commuting shows that the local economy is not providing a sufficient number and quality of jobs to support the local population. Residents are seeking work outside the community to offset this lack of local work availability. Lodi's residents earn nearly 87 percent of the countywide median income. Despite having lower incomes than the County as a whole, City residents have a local poverty rate that is slightly less than that of San Joaquin County.

Approximately 70 percent of Lodi's housing stock consists of single-family residences, which are typically associated with homeownership. Yet, in 2000, only 55 percent of Lodi residents were homeowners, slightly below the state average of 57 percent. Housing costs have limited homeownership opportunities for increasing numbers of Lodi residents. As a result, the percentage of renter-occupied single-family homes increased since 1990. Over the same ten year period, vacancy rates of both rental properties and for sale properties decreased, which creates additional upward pressure on housing costs.

Lodi has experienced a growing gap between housing costs and local incomes. Housing costs have risen to over five times Lodi's median income of $39,489. Rents for market rate apartments and homes have also increased at a faster rate than local incomes. As of spring 2003, the median housing cost in Lodi was nearly $210,000 and the median rent over $800.

Evidence of the divergence between housing costs and local incomes includes increases in overcrowding (more than one person per room) and overpayment (more than 30 percent of income for housing expenses). The percentage of overcrowded renter households increased from 15 to 20 percent and owner households from three to six percent. In 2000, over 44 percent of renters overpaid for housing, an increase of nearly 460 households, while 24 percent of homeowners overpaid for housing, an increase of nearly 900 households. This increase indicates that there is a growing portion of Lodi's population that is unable to afford homeownership.

Rent-restricted housing affordable to lower-income households is limited in Lodi. At present, only 43 units of government assisted housing providing long-term affordability is available to Lodi residents of modest means at the Lodi Hotel, an affordable housing project funding with low-income housing tax credits. In addition, low-income Lodi renters are eligible for Section 8 Housing Choice Vouchers, but there is a long waiting list for this rental assistance. The challenges many Lodi residents face from high costs are compounded by significant percentage of housing units in substandard condition.

Nearly half of the City's housing is more than 30 years old, and about 35 percent is more than 40 years. Based on past housing condition surveys, the City estimates that as many as 5,500 dwelling units (about 25 percent of the housing stock) may need repairs ranging from deferred maintenance, to substantial rehabilitation, to replacement.

According to the 2001-2009 Regional Housing Needs Allocation Plan prepared by San Joaquin County Council of Governments, Lodi should plan to accommodate 4,014 additional residential units between 2001 and 2009, about 535 per year. Of those residential units, 1,654, or 40 percent, should be affordable to households earning no more than 80 percent of the countywide median income (approximately $40,480 annually). About 2,500 new homes have been added to Lodi's housing stock since 1990 (200 units per year). The rate of housing construction is less than half of the City's future housing need under the SJCOG housing plan.

Much of the gap between the prior rate of housing construction and projected housing need may be due to weak demand during the early to mid-1990s. However, the shortage of large, easily developable sites, the City's annual housing permit allocation process, and other City policies and regulations may also impact the rate of housing construction. Potential impacts of market factors and City policies and regulations are examined in the Housing Element.

C. State Requirements

Beginning in 1980 and refined periodically, the California Legislature adopted requirements for the contents of housing elements (California Government Code sections 65580 to 65589.5). Among these legislative requirements is the mandate that housing elements consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, and programs for the preservation, improvement, and development of housing. Although state law regarding housing elements requires communities to address the needs of all residents, particular attention in the housing element law is devoted to the needs of low- and moderate-income households. Specifically, state law requires housing elements to:

- Identify adequate sites to facilitate and encourage housing for all income levels;
- Remove governmental constraints to housing production, maintenance, and improvement;
- Assist in the development of adequate housing for low- and moderate-income households;
- Conserve and improve the condition of existing affordable housing; and
- Promote housing opportunities for all persons.

The contents of a housing element, as mandated by state law, include:

- An assessment of housing needs that includes an analysis of population and housing characteristics, employment and population projections, special housing needs, subsidized rental housing at-risk of conversion, future housing construction need (regional housing allocation), and opportunities for energy conservation;
- An analysis of constraints (governmental and non-governmental) to the maintenance, improvement, or development of housing for all income levels;
- An inventory of vacant and underutilized sites by zoning category, with an assessment of the availability public facilities, and services to those sites; and
- A housing strategy containing an evaluation of past program achievements, goals, and policies, and a five-year schedule of implementing actions with quantified objectives.

D. Data Sources and Their Use

A variety of local, regional, state, federal, and private sources of information were used to prepare the 2003 Housing Element. As required by state law (Government Code Section 65584), the principal source of information used to determine future housing construction need is the San Joaquin County Regional Housing Needs Allocation for the 2001 to 2009 planning period. Other principal sources of information included the U. S Census Bureau, the California Department of Finance, the California Employment Development Department, California Health and Welfare Agency reports, the City of Lodi, San Joaquin County, the California Association of Realtors, local nonprofit organization serving special needs population, and local real estate and property management firms.

E. Housing Goals and Policies

Goal A: To provide a range of housing types and densities for all economic segments of the community while emphasizing high quality development, homeownership opportunities, and the efficient use of land.

Policies

1. The City shall promote the development of a broad mix of housing types through the following mix of residential land uses: 65 percent low density, 10 percent medium density, and 25 percent high density.

2. The City shall regulate the number of housing units approved each year to maintain a population-based annual residential growth rate of 2.0 percent, consistent with the recommendations of the Mayor's Task Force and the growth management ordinance.

3. The City shall continue to exempt senior citizen housing projects from the growth management ordinance.

4. The City shall exempt very low- and/or low-income housing units from the growth management ordinance.

5. The City shall maintain and regularly update its land use database to monitor vacant residential land supply.

6. The City shall pursue available and appropriate state and federal funding programs and collaborate with nonprofit organizations to develop affordable housing.

7. The City shall promote the expeditious processing and approval of residential projects that conform to General Plan policies and City regulatory requirements.

8. The City shall seek to reduce the cost impact of its policies, regulations, and permit procedures on the production of housing, while assuring the attainment of other City objectives.

9. The City shall grant density bonuses of at least 25 percent and/or other incentives in compliance with state law for projects that contain a minimum specified percentage of very low-income, low-income, ~~or~~ qualifying senior housing units or units designed to facilitate individuals with physical challenged.

10. The City shall seek to intersperse very low- and low-income housing units within new residential developments and shall ensure that such housing is visually indistinguishable from market-rate units.

11 The City shall continue to allow and encourage the development of a variety of housing and shelter alternatives, both renter and owner, to meet the diverse needs of the City's population.

12. The City shall promote the development of senior and other special needs housing near, and/or with convenient public transportation access to, neighborhood centers, governmental services, and commercial service centers.

13. The City shall encourage infill residential development and higher residential densities within the existing City limits near transit stops, and compact development patterns in annexation areas to reduce public facility and service costs, avoid the premature conversion of natural resource and agricultural lands, and reduce the number of trips from private vehicles.

Goal B: To encourage the maintenance, improvement, and rehabilitation of the City's existing housing stock and residential neighborhoods, particularly in the Eastside area.

Policies

1. The City shall encourage private reinvestment in older residential neighborhoods and private rehabilitation of housing.

2. The City shall prohibit the conversion of existing single-family units to multifamily units on residentially zoned properties less than 6,000..

3. The City shall use available and appropriate state and federal funding programs and collaborate with nonprofit organizations to rehabilitate housing and improve older neighborhoods.

4. Housing rehabilitation efforts shall continue to be given high priority in the use of Community Development Block Grant (CDBG) funds, especially in the Eastside area.

5. The City shall support the revitalization of older neighborhoods by keeping streets and other municipal systems in good repair.

6. The City shall allow reconstruction of existing housing in the Eastside area and in commercially or industrially designated areas in the event such housing is destroyed or damaged.

7. The City shall implement historic preservation guidelines to preserve historically significant residential structures and insure that infill projects fit within the context of the neighborhood. (See the Urban Design and Cultural Resources Element for implementation of this policy.)

8. The City shall continue to enforce residential property maintenance standards.

Goal C: To ensure the provision of adequate public facilities and services to support existing and future residential development.

Policies

1. The City shall support the use of CDBG funds for the upgrading of streets, sidewalks, and other public improvements.

2. The City shall ensure that new residential development pays its fair share in financing public facilities and services and will pursue financial assistance techniques to reduce the cost impact on the production of affordable housing.

3. The City shall ensure that all necessary public facilities and services shall be available prior to occupancy of residential units.

4. The City shall require that park and recreational acquisitions and improvements keep pace with residential development.

Goal D: To promote equal opportunity to secure safe, sanitary, and affordable housing for all members of the community regardless of race, sex, or other arbitrary factors.

Policies

1. The City shall seek to address the special housing needs of persons with disabilities, lower-income large families, seniors, single-parent households, farmworkers, and persons in need of temporary shelter.

2. The City shall make available to the public information on nonprofit, county, state, and federal agencies that provide education, mediation, and enforcement services related to equal housing opportunity.

3. The City shall establish regulations that govern the conversion of apartments and mobile home parks to condominiums to reduce the displacement of lower-income households.

4. The City shall work with surrounding jurisdictions to address the needs of the homeless on a regional basis.

5. The City shall cooperate with community-based organizations that provide services or information regarding the availability of assistance to the homeless.

6. The City shall continue to promote fair housing programs and services to residents and property owners in Lodi.

Goal E: To encourage residential energy efficiency and reduce residential energy use.

Policies

1. The City shall require the use of energy conservation features in the design and construction of all new residential structures and shall promote the use of energy conservation and weatherization features in existing homes.

2. The City shall require solar access in the design of all residential projects.

3. The City shall pursue residential land use and site planning policies, and promote planning and design techniques, that encourage reductions in residential energy consumption.

F. Public Participation

The City encouraged participation by all segments of the community in the preparation of the Housing Element through a combination of general public notices and direct contacts with organizations serving low-income and special needs groups and inviting them to attend a public workshop on the Housing Element. To provide opportunities for public participation in the preparation of the Housing Element, the City conducted a public workshop on March 26, 2003 to explain the purpose and contents of the Housing Element, state requirements, and the update process. The City also solicited public comments on key issues and information sources on which to focus the update through a study session of the City Council on May 13, 2003.

The City solicited involvement by all segments of the community through written invitations sent to community based organizations, nonprofit housing organizations, building industry representatives, and public agencies; public notices in the Lodi Sentinel, and posted notices in City buildings.

Prior to submitting the draft Housing Element to the California Department of Housing and Community Development for state-mandated review, the City Council conducted a study session on December 17, 2003, open to the public, the review the draft and receive public comments.

The City also conducted public hearings before the Planning Commission and City Council and the Housing Element to solicit public comments prior to adoption. The Planning Commission hearing was held on INSERT DATE and the City Council hearing on INSERT DATE

To ensure that all segments of the community were notified of the public events, the City published public notices in the NOTICE LOCATIONS, and posted notices at POSTING LOCATIONS. To ensure participation by low-income residents and organizations serving their needs, the City INSERT ACTIONS TAKEN TO INCLUDE LOW-INCOME RESIDENTS.

Comments made be the public regarding the Housing Element included the following:

- INSERT COMMENTS FROM PUBLIC WORKSHOP AND HEARINGS

To address these comments, the City has incorporated policies and actions in the Element to increase the supply of alternative housing types, facilities, and supportive services for special needs groups, including seniors and persons at-risk of homelessness; and to continue to commit the City to actively supporting and funding affordable housing development.

G. General Plan Consistency

To promote a uniform and compatible vision for the development of the community, the General Plan must be internally consistent in its goals and policies as required by California Government Code Section 65300.5. Government Code section 65583(c) requires that a housing element describe how consistency has been achieved among the general plan elements. The most important aspect of consistency among general plan elements is that policies and implementation measures do not conflict, but support one another, to achieve the overall goals and vision of a general plan.

In preparing the 2003 Housing Element, the City reviewed goals and policies of the various elements of the Lodi General Plan. The City has concluded that the 2003 Housing Element is consistent with the vision of the General Plan. Policies included in other General Plan elements that affect housing are summarized below.

General Plan Land Use Element

1. The City shall establish a growth management ordinance that ensures a population-based housing growth rate of 2.0 percent (compounded) per year consistent with the recommendations of the Mayor's Task Force on Measure A.

2. The City shall require specific development plans in areas of major new development.

Housing Element:

3. The City shall encourage the preservation of agricultural land surrounding the City.

4. The City shall support the continuation of agricultural uses on lands designated for urban uses until urban development is imminent.

5. The City shall promote land use decisions within the designated urbanized area that allow and encourage the continuation of viable agricultural activity around the City.

6. The City shall maintain an adequate supply of residential land in appropriate land use designations and zoning categories to accommodate a population-based 2.0 percent per year housing growth rate.

7. The City shall promote the development of affordable housing to meet the needs of low- and moderate-income households.

8. In evaluating development proposals under the City's growth management ordinance, the City shall grant priority to the projects that include units affordable to low- and moderate-income households.

9. The City shall exempt senior citizen housing projects from the growth management ordinance.

10. The City shall encourage higher density housing to be located in areas served by the full range of urban services, preferably along collector, arterial, and major arterial streets, and within walking distance of shopping areas.

11. The City shall strive to maintain a housing ratio of 65 percent low-density, 10 percent medium-density, and 25 percent high-density in new development.

General Plan Parks, Recreation, and Open Space Element

12. The City shall assess a park development fee on all new residential, commercial, office, and industrial development sufficient to fund the acquisition and development of new parkland consistent with the City standards identified in the policy above.

13. The City shall expand the neighborhood and community park system with the goal of providing park facilities within walking distance of all new residential areas.

14. The City shall require that more open space be provided within multifamily developments through wider setbacks and greater building separation.

15. The City shall promote the provision of private open space and recreational facilities as part of new large-scale residential developments to meet a portion of the recreation and open space needs that would be generated by the development.

General Plan Health and Safety Element

16. The City shall assess development fees on all new residential, commercial, office, and industrial development sufficient to fund capital improvements and equipment required to provide fire protection.

17. The City shall assess development fees on all new residential, commercial, office, and industrial development sufficient to fund capital improvements and equipment required to provide police protection.

General Plan Urban Design and Cultural Resources Element

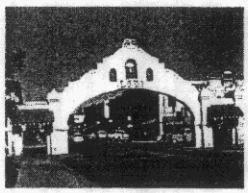
18. The City shall respect existing neighborhood scale and character when infilling and/or upgrading existing residential areas.

19. The City shall promote the creation of well-defined residential neighborhoods in newly developing areas. Each of these neighborhoods should have a clear focal point, such as a park, school, or other open space and community facilities, and should be designed to promote pedestrian convenience.

20. The City shall provide home improvement incentives for upgrading landscaping and parking areas in the Eastside neighborhood.

On the basis of this analysis, the Housing Element is found to be consistent with the other elements of the General Plan, as well as documents and plans adopted in accordance with the General Plan.

II. COMMUNITY PROFILE



A. Population and Household Characteristics

1. Population Trends

Lodi's 2003 population is estimated to be 60,521 people by the California Department of Finance. Lodi is the third largest City in San Joaquin County, behind the cities of Stockton and Tracy and slightly larger than the City of Manteca.

Between 1990 and 2000, Lodi's population increased by 9.8 percent or 5,125 persons. During the same time period, all other cities within San Joaquin County experienced significantly higher population growth. For example, Stockton, the largest City in the county, experienced a population increase of 15.6 percent, or 32,828 persons. The remaining cities all experienced population increases of 20 percent or more (See Table II-1).

According to the San Joaquin Council of Governments (SJCOG), Lodi's population is expected to increase by 21.3 percent, or 12,157 persons, between 2000 and 2020. SJCOG's 20-year population growth projection is approximately the same on an annual basis as the city's historic population growth rate during the 1990s. The other cities within San Joaquin County are projected to continue to add population at a faster rate than Lodi.

Table II-1: Population Growth (1990 and 2000)

Jurisdiction	1990	2000	Numeric Change	Percent Change
San Joaquin County	480,628	563,598	82,970	17.3%
Lodi	**51,874**	**56,999**	**5,125**	**9.8%**
Escalon	4,437	5,963	1,526	34.4%
Lathrop	6,841	10,445	3,604	52.7%
Manteca	40,773	49,258	8,485	20.8%
Ripon	7,455	10,146	2,691	36.1%
Stockton	210,943	243,771	32,828	15.6%
Tracy	33,558	56,929	23,371	69.6%

Source: U.S. Census (1990 and 2000)

Table II-2 shows growth projections for Lodi, San Joaquin County, and other cities in the County.

Table II-2: Population Projections (2000 to 2020)

Jurisdiction	2000 Population	2020 Population	Numeric Change	Percent Change
San Joaquin County	563,598	766,843	203,245	36.1%
Lodi	**56,999**	**69,156**	**12,157**	**21.3%**
Escalon	5,963	8,929	2,966	49.7%
Lathrop	10,445	20,627	10,182	97.5%
Manteca	49,258	77,699	28,441	57.7%
Ripon	10,146	20,524	10,378	102.3%
Stockton	243,771	374,631	130,860	53.7%
Tracy	56,929	117,788	60,859	106.9%

Source: San Joaquin Council of Governments, 2001

2. Age Characteristics

Between 1990 and 2000, Lodi experienced significant population growth among children and persons age 35 to 54, while the number of younger adults (age 25 to 34) and seniors (age 65 or more) declined or remained static.

According to the 2000 Census, Lodi had 11,596 persons ages 5 to 17, or approximately 20 percent of the total population. This age group increased by more than 2,600 persons between 1990 and 2000. Other age groups with significant population growth were 35- to 44-year olds (1,064 persons) and 45- to 54-year olds (2,154 persons). Conversely, the number of residents age 25 to 34 declined by 1,841, from 18.2 percent of the total population to 13.3 percent. The number of persons age 65 and older remained approximately the same between 1990 and 2000.

The decrease in the number of residents between the ages of 25 and 34 may be attributed to the increase in housing costs that are discussed later in this report. Persons in the 25- to 34-year age bracket begin to form families and look for their first homes to purchase. However, these persons are also in the first half of their careers and tend to have modest incomes. Given the increase in housing costs that have occurred in Lodi since 1990, many persons in this age group may have moved from the City to purchase less costly homes in other communities.

While the number of persons in their mid-20s to mid-30s decreased, the number of persons in their mid-30s to mid-50s increased. Such persons have higher incomes, can afford higher-priced housing in Lodi, and may be attracted to the quality of life that Lodi offers.

The significant increase in the number of five- to 17-year olds may be related to the increase in the number of families with two or more children. Much of this change in family size occurred in Lodi during a time when the City experienced a significant increase in the number of residents of Hispanic/Latino origin, as discussed below. This group also has an average family size significantly above the citywide average and more children per family.

Table II-3 compares age characteristics in 1990 and 2000 in Lodi.

Table II-3: Age Characteristics (1990 and 2000)

Age Group	1990		2000	
	Persons	Percent	Persons	Percent
Preschool (<5 yrs)	4,106	7.9%	4,495	7.9%
5-17	8,954	17.3%	11,596	20.3%
18-24	5,018	9.7%	5,472	9.6%
25-34	9,446	18.2%	7,605	13.3%
35-44	7,363	14.2%	8,427	14.8%
45-54	4,738	9.1%	6,896	12.1%
55-64	4,108	7.9%	4,367	7.7%
65+	8,141	15.7%	8,141	14.3%
Total	**51,874**	**100.0%**	**56,999**	**100.0%**

Source: U.S. Census (1990 and 2000)

3. Race and Ethnicity

During a time of modest population growth, the number of persons who identified themselves as being of Latino/Hispanic origin increased by 76 percent, or 6,698 persons, between 1990 and 2000 (See Table II-4). Conversely, the number of persons identifying themselves as non-Hispanic whites decreased significantly, both numerically and as a percentage of the total population over the same time period. The significance of changes in ethnicity for housing needs relate to differences in income levels and family sizes among various population groups, as discussed below.

Table II-4: Lodi Race and Ethnicity (1990 and 2000)

Race/Ethnicity	1990		2000	
	Persons	Percent	Persons	Percent
Race, Not of Latino/Hispanic Origin				
White, not of Hispanic origin	40,205	77.5%	36,200	63.5%
African American	148	0.3%	260	0.5%
Native American	386	0.7%	309	0.5%
Asian or Pacific Islander	2,327	4.5%	2,860	5.0%
Other race	42	0.08%	1,906	3.3%
Latino/Hispanic Origin	8,766	16.9%	15,464	27.1%
Total	**51,874**	**100.0%**	**56,999**	**100.0%**

Note: Difference is due in part to the Census allowing for Other Race category to include persons of *multiple descents whereas, in the past*, persons were only counted for their "dominant" ethnic or racial background.

Source: U.S. Census (1990 and 2000)

4. Household, Family, and Group Quarters Characteristics

The most significant changes in household composition in Lodi during the 1990s were: 1) the increase in average family size at the same time that the number of family households increased modestly (and declined as a percent of all households), and 2) the significant increase in the number and percent of non-family households. Another significant change was the decline in the number of persons living in group quarters. While the number of family households with children increased modestly, the number of children per family increased significantly.

According to the Census Bureau, 21,952 households lived in Lodi in 2000. Approximately 65 percent of those households consisted of families and the remainder consisted of non-family households (unrelated individuals who share living quarters). Approximately 25 percent of all households consisted of families with children. Between 1990 and 2000, the average family size increased from 3.11 to 3.25. The average household size in Lodi continued to increase after 2000, to 2.77 in 2003, according to the California Department of Finance (DOF).

The number of non-family households (single persons and unrelated individuals sharing living quarters) increased significantly during the 1990s, from 30 percent to 35 percent of all households.

Group quarters include facilities such as retirement or convalescent homes, correctional institutions, and dormitories. Between 1990 and 2000, the number of persons living in group quarters in Lodi decreased by 62 percent, from 1,894 to 1,024. The decrease was primarily due to a significant numerical decrease in the number of persons residing in nursing homes.

Table II-5 shows changes in types of households in Lodi between 1990 and 2000.

Table II-5: Changes in Household Type (1990 and 2000)

Household by Type	1990	%	2000	%
Household				
Total Households	19,121	100.0%	21,952	100.0%
Average Household Size	2.62	--	2.71	--
Average Family Size	3.11	--	3.25	--
Family Household (families)	13,299	69.6%	14,296	65.1 %
Married-Couple Families	10,492	54.9%	10,636	48.5%
With Children	4,738	24.8%	5,479	25.0%
Female Householder, no spouse	2,260	11.8%	2,427	11.0%
With Children	1,520	7.9%	1,701	7.7%
Non-Family Households	5,681	29.7%	7,656	34.7%
Group Quarters (Non-Household Population)				
Persons in Group Quarters	1,894	3.6%	1,024	1.8%

Note: Some cells do not total 100% due to rounding.
Source: 1990 and 2000 Census.

As discussed earlier in this section, the two ethnic groups with the largest population increases between 1990 and 2000 were persons who identified themselves as being of Latino/Hispanic origin and persons who identified themselves as being of Asian or Pacific Islander Origin. Both Hispanic and Asian households had significantly higher average family sizes, 4.16 and 3.69 respectively, compared to non-Hispanic whites at 2.91 (See Table II-6).

Table II-6: Average Family Size by Ethnicity (2000)

Race/Ethnicity	Average Family Size
White, not of Hispanic origin	2.91
African American	3.68
Native American	3.45
Asian or Pacific Islander	3.69
Other race	4.32
Latino/Hispanic Origin	4.16

Source: Census 2000

5. Household Income

The median income for all households in Lodi in 2000 was $39,489, compared to $41,282 for San Joaquin County. The median income of homeowners residing in Lodi in 2000 was $52,665, approximately twice the amount of the median income for renters, $26,422.

As seen in Table II-7, in 2000, the majority of homeowners in Lodi earned incomes of $35,000 or more, compared to the majority of renters who earned incomes from $10,000 to $50,000. In 2000, there were 3,251 owner-occupied households with incomes between $5,000 and $35,000 compared to 5,973 renter-occupied households in that income bracket. The monetary resources needed to own a home are much greater than those needed to rent housing, resulting in a higher median income for homeowners.

The median income for non-Hispanic whites was approximately 36 percent higher than the median for all households in 2000. By comparison, Hispanic households had a median income of $28,103, approximately $25,000 less than non-Hispanic whites. African American householders had the lowest median income of all ethnic groups in 2000.

Table II-8 shows median income by race and ethnicity in Lodi in 2000.

Table II-7: Household Income by Tenure (2000)

Income	Households	% of Total
Owner Occupied		**11,264**
Less than $5,000	181	1.6%
$5,000 to $9,999	427	3.8%
$10,000 to $14,999	380	3.4%
$15,000 to $19,999	479	4.3%
$20,000 to $24,999	566	5.0%
$25,000 to $34,999	1,218	10.8%
$35,000 to $49,999	1,907	17.0%
$50,000 to $74,999	2,772	24.6%
$75,000 to $99,999	1,538	13.6%
$100,000 to $149,999	1,249	11.1%
$150,000 and more	547	4.8%
City Median Income – All Owners		**$52,665**
Renter Occupied		**9,430**
Less than $5,000	528	5.6%
$5,000 to $9,999	858	9.1%
$10,000 to $14,999	1,099	11.7%
$15,000 to $19,999	1,095	11.6%
$20,000 to $24,999	845	9.0%
$25,000 to $34,999	1,548	16.4%
$35,000 to $49,999	1,530	16.2%
$50,000 to $74,999	1,194	12.6%
$75,000 to $99,999	426	4.5%
$100,000 to $149,999	159	1.7%
$150,000 and more	148	1.6%
City Median Income – All Renters		**$26,422**
City Median Income – All Households		**$39,489**
Total		**20,694**

Note: 2000 Census information is from 1999)
Source: Census 2000

Table II-8: Median Income by Race and Ethnicity (2000)

Race/Ethnicity	Median Family Income
White, not of Hispanic origin	$53,660
African American	$14,773
Native American	$23,482
Asian or Pacific Islander	$38,917
Other race	$29,471
Latino/Hispanic Origin	$28,103

Source: Census 2000

6. Poverty Rate

The poverty rate in Lodi is slightly less than that countywide, but varies considerably by population group. The poverty rate measures the percent of individuals below a level of income necessary for subsistence living. According to the 2000 Census, approximately 17 percent of the city's residents lived at or below the poverty level, compared to about 18 percent countywide. Female-headed households with children in Lodi had the highest poverty rate, almost double the poverty rate for the entire population. Female headed-households with children under five years of age were most likely to live in poverty at nearly 47 percent. By comparison, 41 percent of female-headed households with children under five years old lived in poverty countywide.

Those with the lowest poverty rate, less than ten percent for Lodi and 11 percent countywide, were persons 65 years old and older. This group had the lowest percentage of poverty of all groups, except for families without children.

Table II-9 shows poverty status by family type and by total population in 1999 in Lodi.

Table II-9: Poverty Status (1999)

Households	City of Lodi		San Joaquin County	
	# Below Poverty	% Below Poverty	# Below Poverty	% Below Poverty
Families	858	8.1%	8,510	8.4%
w/ children under 18	716	13.1%	7,076	12.3%
w/ children under 5	194	16.4%	1,103	12.0%
Families with female householder, no husband Present	679	28.0%	7,900	32.5%
w/ children under 18	617	36.3%	6,999	38.8%
w/ children under 5	129	46.7%	1,140	41.2%
Total Population	**9,374**	**16.7%**	**97,105**	**17.7%**
Under 18	3,737	23.5%	41,186	24.2%
18 to 64	4,923	15.0%	50,234	15.7%
65 and over	714	9.6%	5,685	11.1%

Source: Census 2000

B. Housing Stock Characteristics

1. Housing Type

Lodi is a community of primarily single-family homes. The total number of housing units in Lodi in 2000 was 21,400 units and 22,189 units in 2003 (January). Two-thirds of the city's housing stock is composed of single-family homes. Nearly 90 percent of the housing constructed during the 1990s was single-family homes (See Table II-10). Lodi's stock of detached single-family units increased by 1,525, and the number of attached single-family units increased by 207. Since 2000, virtually all housing units constructed have been single-family detached or attached homes.

Table II-10: Changes in Housing Stock (1990 and 2000)

Housing Type	1990		2000	
	Number	Percent	Number	Percent
Single Family	12,956	65.8%	14,688	68.6%
Detached	11,708	59.5%	13,233	61.8%
Attached	1,248	6.3%	1,455	6.8%
Multi Family	5,991	30.4%	6,248	29.2%
2-4 Units	1,755	9.0%	1,744	8.1%
5+ Units	4,236	21.5%	4,504	21.0%
Mobile Homes	516	2.6%	457	2.1%
Other	213	1.1%	7	0.03%
Total Units	**19,676**	**100.0%**	**21,400**	**99.93%**

Source: Census 1990 and 2000

2. Tenure

In 2000, homeowners comprised 54.4 percent of households in Lodi, while renters comprised the remaining 45.6 percent (See Table II-11). The rate of homeownership in Lodi is slightly below statewide level (57 percent) and significantly below the countywide level (approximately 60 percent).

Table II-11: Housing Tenure (1990 and 2000)

Tenure of Units	1990		2000	
	Number	Percent	Number	Percent
Owner-Occupied	10,317	54.3%	11,264	54.4%
Renter-Occupied	8,684	45.7%	9,430	45.6%

Source: Census 1990, 2000

Between 1990 and 2000, the proportion of rented single-family homes increased, from 24 percent to 25 percent of such housing units. This slight increase does not reflect a lack of new construction of housing units, but rather many Lodi residents may lack the financial resources to afford homeownership. In addition, the small increase in multifamily rental housing since 1990 has forced some households who cannot afford to purchase homes to rent single-family homes instead. Table II-12 compares tenure by housing type. Countywide, about 20 percent of single-family homes are rented. The change in tenure of single-family homes could be related to the increase in relatively lower-income families that moved to Lodi between 1990 and 2000 and who cannot afford homeownership to the same extent as other residents.

Table II-12: Tenure by Units in Structure (1990 and 2000)

Housing Type	1990		2000	
	Number	Percent	Number	Percent
Owner-Occupied	**10,317**	**54.3%**	**11,264**	**54.4%**
Single Family	9,615	50.6%	10,662	51.5%
2-4 Units	128	0.7%	162	0.8%
5+ Units	102	0.5%	90	0.4%
Mobile Homes	409	2.2%	343	1.7%
Other	63	0.3%	7	0.03%
Renter-Occupied	**8,684**	**45.7%**	**9,430**	**45.6%**
Single Family	3,063	16.1%	3,616	17.5%
2-4 Units	1,672	8.8%	1,527	7.4%
5+ Units	3,729	19.6%	4,193	20.3%
Mobile Homes	66	0.3%	94	0.5%
Other	154	0.8%	0	0.0%
Total Units	**19,001**	**100.0%**	**20,694**	**100.0%**

Source: *Census 1990 and 2000*

Homeownership by population group varies significantly on Lodi. In 2000, non-Hispanic whites and persons of Asian-origin had the highest rates of homeownership, about 60 percent and 62 percent. As discussed earlier, incomes of non-Hispanic white and Asian-origin households are significantly higher than for other groups. Households with a significantly higher percentage of renters were those identified as African American (88.6 percent), those identified as American Indian or Alaskan Native (69.5 percent), and those identified as being of Hispanic origin (67.7 percent). Table II-13 compares tenure by race in 1990 and 2000 in Lodi.

Table II-13: Tenure by Race and Hispanic Origin (2000)

	Homeowners		Renters	
	Number	Percent	Number	Percent
White Alone (not Hispanic or Latino)	9,065	59.6%	6,132	40.4%
Black or African American Alone	10	11.4%	78	88.6%
American Indian or Alaskan Native Alone	57	30.5%	130	69.5%
Asian Alone	602	61.6%	375	38.4%
Some Other Race Alone	692	34.7%	1,301	65.3%
Two or More Races	375	48.1%	405	51.9%
Hispanic or Latino	1,182	32.3%	2,482	67.7%

Source: Census 2000

Homeownership also varies by age of householder. The most significant trend in tenure by age is the decline in the rate of homeownership among most age groups. Only two age groups, those 45 to 54 years old and those 65 years or older, experienced significant increases in the numbers of homeowners. While none of the declines in the rate of homeownership were large (less than five percentage points), they nonetheless provide further evidence of the challenge faced by a growing number of Lodi residents in affording homeownership. Households age 25 to 35 were the only age group to experience a decline in both the number and percentage of homeowners.

Table II-14 compares tenure by age in 1990 and 2000 in Lodi.

Table II-14: Tenure by Age of Householder (2000)

Households	1990		2000	
	Number	%	Number	%
			Owner-occupied housing units	
15 to 24 years	92	7.8%	129	11.2%
25 to 34 years	1,432	33.2%	1,051	29.8%
35 to 44 years	2,173	54.7%	2,263	49.8%
45 to 54 years	1,726	65.0%	2,457	63.1%
55 to 64 years	1,689	71.9%	1,794	70.0%
65 years and over	3,205	70.7%	3,614	72.3%
Total:	**10,317**	--	**11,308**	--
			Renter-occupied housing units	
15 to 24 years	1,085	92.2%	1,022	88.8%
25 to 34 years	2,881	66.8%	2,478	70.2%
35 to 44 years	1,798	45.3%	2,279	50.2%
45 to 54 years	930	35.0%	1,438	36.9%
55 to 64 years	661	28.1%	781	30.0%
65 years and over	1,329	29.3%	1,386	27.7%
Total:	**8,684**	--	**9,384**	--

Source: U.S. Census (1990 and 2000)

3. Housing Vacancy

Vacancy rates for rental housing units decreased, and vacancy rates for owner-occupied housing units increased slightly (but was still low), between 1990 to 2000 According to the 2000 Census, the effective vacancy rate, or the percentage of units available for sale or rent at a given time, was 2.9 percent for rental housing. This is a significant decrease from the 4.4 percent effective vacancy rate for rental housing in 1990. The effective vacancy rate for ownership housing in 2000 was 1.2 percent, compared with 0.9 percent in 1990.

Rental vacancy rates appear to have declined since 2000. Information gathered from a survey of local rental property managers indicates that the vacancy rate for rental housing in Lodi, both apartments and single-family homes, is less than one percent. On average, each property has approximately 3 vacant units per year, which typically rent very quickly.

Low vacancy rates create upward pressure on housing costs, because the increase in demand is significantly higher than the increase in supply. The low vacancy rates, a symptom of an imbalance between housing supply and demand, are on the reasons for the rise in housing costs that are discussed later in this report.

Table II-15 vacancy rates for housing units in 1990 and 2000 in Lodi.

Table II-15: Housing Vacancy (1990 and 2000)

Type of Housing	1990		2000	
	# of Units	% of total	# of Units	% of total
Total units in Lodi	19,676	100.0 %	21,378	100.%
Vacant units:				
For rent	395	2.0%	285	1.3%
For sale only	96	0.5%	139	0.7%
Rented or sold, not occupied	62	0.3%	67	0.3%
For seasonal, recreational, or occasional use	34	0.2%	41	0.2%
For migrant workers	0	0.0%	1	0.005%
Other vacant	88	0.4%	153	0.7%
Total vacant units:	**675**	--	**686**	--
Effective Vacancy Rate	--	**2.5%**	--	**2.0%**

Source: U.S. Census (1990 and 2000).

4. Overcrowding

Between 1990 and 2000, the occurrence of overcrowding (more than one person per room) for both owners and renters in Lodi increased. Approximately 15 percent of all renters lived in overcrowded conditions in 1990. The number of renters living in overcrowded conditions increased in 2000 to about 20 percent. By comparison, just over three percent of homeowners lived in crowded conditions in 1990, which increased to nearly six percent in 2000.

The increase in overcrowding for both renters and homeowners could be attributed to the increase in average family size discussed in previous sections of this document. Rising housing costs in relation to local incomes may also have contributed to an increase in overcrowding. The gap between housing costs and incomes forces lower-income families to share housing, children to delay leaving their parents' homes, and unrelated individuals to share housing. Each of these factors contributes to an increase in overcrowding.

Table II-16 shows rates of overcrowding by tenure in 1990 and 2000 in Lodi.

Table II-16: Persons per Room in Occupied Housing Units (1990 and 2000)

Occupant	1990		2000	
	Persons	Percent	Persons	Percent
Owner occupied:				
One or less person/room	9,971	96.6%	10,614	94.2%
More than one person/room	346	3.4%	650	5.8%
Total:	10,317	100.0%	11,264	100.0%
Renter occupied:				
One or less person/room	7,388	85.1%	7,525	79.8%
More than one person/room	1,296	14.9%	1,905	20.2%
Total:	8,684	100.0%	9,430	100.0%

Source: Census 1990, 2000

5. Housing Costs

a. Housing Prices

The median home price for single-family dwelling units of all sizes in Lodi in 1990 was $125,000, increasing to $134,500 in 1995. The median price of a home in Lodi in 2003 is $208,300, an increase of 66 percent since 1990 and 55 percent since 1995 (See Table II-17). The increase in home prices in Lodi over the last 13 years has been significant and may be contributing to the increase in renter-occupied households as the gap between housing prices and local incomes grows.

An alternative to buying a single-family home would be for a family to purchase a condominium or townhouse, which tend to cost less than single-family homes (See Table II-18). However, the

prices of condominiums and townhouses in Lodi are not significantly lower than for many single family homes.

Table II-17: Home Sales (2002 and 2003)

Single Family Home	Average Price	Median Price	Units Sold
1 Bedroom	$110,917	$98,500	20
2 Bedroom	$158,461	$151,000	265
3 Bedroom	$223,410	$210,000	666
4 Bedroom	$291,750	$270,000	147
5 Bedroom	$319,962	$312,000	20
Total	**$220,900**	**$208,300**	**1,118**

Source: DataQuick Home Sales Data, 20(

Table II-18: Condominium Sales (2002)

Bedrooms	Average Price	Median Price	Units Sold
1 Bedroom	$86,846	$69,000	13
2 Bedrooms	$124,115	$105,000	92
3 Bedrooms	$241,238	$206,000	29
Total	**$150,733**	**$126,666**	**134**

Source: DataQuick 2003

b. Rents

The median contract rent in Lodi (the amount paid by renters under a lease or rental agreement) increased from $426 to $527 between 1990 and 2000. The number of units available in lower contract rent ranges affordable to very low-income households decreased significantly between 1990 and 2000. In 1990, about half of contract rents were between $300 and $499. By 2000, about half of contract rents were between $400 and $599. Some of the rental increase can be attributed to general inflation, but the increasing demand for rental housing combined with a lack of rental housing construction has also contributed to the rise in rents.

Table II-19 compares contract rents in 1990 and 2000 in Lodi.

Table II-19: Contract Rents (1990 and 2000)

Value	1990		2000	
	# of units	% of units	# of units	% of units
Less than $100	27	0.3%	17	0.2%
$100 to $149	114	1.3%	37	0.4%
$150 to $199	212	2.5%	92	1.0%
$200 to $249	333	4.0%	157	1.8%
$250 to $299	624	7.2%	203	2.3%
$300 to $349	1,004	11.7%	476	5.4%
$350 to $399	1,275	14.8%	761	8.6%
$400 to $449	1,242	14.4%	1,059	11.9%
$450 to $499	1,020	11.8%	1,256	14.1%
$500 to $549	688	8.0%	1,109	12.5%
$550 to $599	568	6.6%	938	10.5%
$600 to $649	346	4.0%	721	8.1%
$650 to $699	406	4.7%	743	8.4%
$700 to $749	189	2.2%	468	5.3%
$750 to $799 (1990 data = $750 to $999)	397	4.6%	340	3.8%
$800 to $899			391	4.4%
$900 to $999			136	1.5%
$1,000 to $1,499	30	0.3%	287	3.2%
$1,500 to $1,999	x	x	55	0.6%
$2,000 and up	x	x	63	0.7%
No cash rent	141	1.6%	112	1.3%
Median	$426		$527	
Total	**8,616**	**100.0%**	**9,421**	**100.0%**

Source: Census 1990, 2000

Since 2000, rents have increased at a higher rate than during the 1990s. According to property managers in Lodi, the average asking rent for a one-bedroom apartment is $684, approximately $150 more than the median contract rent in 2000. Asking rents for three-bedroom apartments and single-family homes are $1,000 to $1,600. As discussed earlier, vacancy rates for rental units have decreased significantly over the last ten years as the demand for rental housing has increased.

Tables II-20 and II-21 show current average rental rates in Lodi.

Table II-20: Average Apartment Rents by Range

Bedrooms	High	Low	Average
One Bedroom	698	671	684
Two Bedroom	876	841	859
Three Bedroom	1089	1033	1062

Source: Telephone survey of property manager – 3-27-03

Table II-21: Average Single Family Unit Rents by Range

Bedrooms	High	Low	Average
Two Bedroom	$1,250	$1,100	$1,175
Three Bedroom	$1,500	$1,300	$1,400
Four + Bedrooms	$1,600	$1,500	$1,550

Source: Telephone survey of property managers – 3-27-03

6. Overpayment for Housing

Between 1990 and 2000, the occurrence of overpayment for housing increased significantly in Lodi. Renters and homeowners in very-low, low-, and even some moderate-income households were affected by overpayment. Overpayment is defined as housing costs that exceed 30 percent of a household's income. Housing costs include payments for the housing unit (rent or mortgage payment), utilities, property taxes, and homeowner's or renter's insurance.

In 1990, 3,711 renter households overpaid for housing. By comparison, 4,170 renter households overpaid in 2000, a 53 percent increase. The number of homeowners overpaying in 1990 was 1,846 households. In 2000, 2,714 homeowners overpaid for housing costs, a 60 percent increase. Households who overpaid in 1990 were generally those earning low- and very-low incomes. However, as housing costs rose, households with higher incomes were subject to overpayment as well by the year 2000. If this trend continues, even moderate-income households may increasingly be forced to pay more than 30 percent of their incomes for housing.

Table II-22 compares rate of overpayment by tenure in 1990 and 2000 in Lodi.

Table II-22: Households Paying 30% or More for Housing

Income	1990				2000			
	Renters		Owners		Renters		Owners	
	Number	%	Number	%	Number	%	Number	%
Totals	**3,711**	**42.8%**	**1,846**	**17.9%**	**4,170**	**44.2%**	**2,714**	**24.1%**
Less than $10,000	1,382	88.7%	342	41.8%	1,093	78.9%	418	82.8%
$10,000 to $19,999	1,536	73.2%	346	29.0%	1,935	88.2%	378	53.3%
$20,000 to $34,999	706	25.9%	541	29.2%	983	41.2%	727	45.4%
$35,000 to $49,999	87	6.1%	403	19.4%	131	8.6%	600	34.1%
$50,000 to $74,999 (1990=$50,000 or more)	0	0.0%	214	6.4%	28	2.3%	487	18.9%
$75,000 to $99,999	--	--	--	--	0	0.0%	77	5.2%
$100,000 to $149,999	--	--	--	--	--		27	2.3%
$150,000 or more	--	--	--	--	--		0	0.0%

Source: Census 1990, 2000

7. Age and Condition of Housing

Nearly half (47 percent) of the housing units in Lodi are over 30 years old (See Table II-23). Given the age of these homes, some of Lodi's housing stock could potentially be substandard and/or subject to deterioration associated with improper maintenance and repair. Because the City has not conducted a recent housing condition survey, however, there is no recent quantified information on housing rehabilitation need.

Table II-23: Age of Housing Structure (2000)

Age of Structure	Number	Percent
< 10 years	2,734	12.8%
10 to 20 years	4,590	21.4%
20 to 30 years	4,014	18.8%
30 to 50 years	6,279	29.3%
50 + years	3,783	17.7%
Total	**21,400**	**100.0%**
Median Year Constructed: 1972		

Source: Census 2000

The most current information, from a Housing Assistance Plan (HAP) prepared by the City for federal funding in 1984, was that 1,778 housing units were in substandard condition, of which 156 needed replacement. The number of substandard housing units in 1984 represented about 12 percent of the housing stock and about 70 percent of the number of housing units over 40 years old at the time. The HAP used 40 years as a criterion for estimating potential rehabilitation need.

Over that past 20 years, the number of housing units over 40 years old has increased, to about 7,800 (about 35 percent of the city's housing stock, compared to about 17 percent in 1984). If the relationship between age and condition in 2003 is the same as in 1984, as much as 70 percent of the housing over 40 years old may need rehabilitation, or up to 5,500 dwelling units. This number represents about 25 percent of the city's housing stock.

Another method of estimating potential housing rehabilitation need is to examine the relationship between the age of housing, tenure, and housing type. Communities with higher concentrations of older, rental housing, particularly older apartments and mobilehomes, have higher propensities to contain substandard housing. This relationship is due, in part, to the ability of occupants to pay rents sufficient to induce owners to maintain or rehabilitate their rental units, and, in part, to the costs and potential increases in property values that owners might realize by rehabilitating older rental units.

As noted previously, Lodi has both a high proportion of older housing and rental housing, including multifamily rental units. The city's housing stock may have a high housing rehabilitation need, therefore.

To estimate the maximum potential rehabilitation need based on age, type, and tenure of housing, the City has used the following assumptions:

- Multi-unit rental housing constructed prior to 1970 may be susceptible to deterioration and may have a high need for rehabilitation or deferred maintenance. There are 1,958 such housing units in Lodi.
- Mobilehomes constructed prior to 1980, when uniform federal construction standards were fully implemented and enforced, may also have a susceptibility to deterioration. There are 160 such homes in Lodi.
- Single-family homes constructed prior to 1960 that are renter-occupied may have a high likelihood of rehabilitation need. There are 1,552 such homes in Lodi.
- Owner-occupied single-family homes constructed prior to 1940 may have a high rehabilitation need as such homes are most likely to require major renovation and upgrading of plumbing and electrical systems. There are 1,848 such homes in Lodi.

Based on these assumptions, up to 5,518 housing units in Lodi are most susceptible to deterioration and have the highest likelihood of needing rehabilitation or deferred maintenance. This estimate of maximum potential rehabilitation need is similar to the estimate of 5,500 dwelling units above (based on a percentage of the housing stock more than 40 years old).

Because substantial investment in the housing stock has occurred over the past 20 years, many of the housing units identified as substandard in 1984 may have been rehabilitated by private action and/or public assistance. Other housing units that have become 30 to 40 years old or

more since the 1980s may have been rehabilitated by their owners before becoming substandard. The estimate of up to 5,500 housing units potentially in need of rehabilitation should be considered a maximum estimate of need that includes conditions ranging from deferred maintenance to dilapidation (housing in need of replacement).

The City's Neighborhood Improvement Division administers programs that work to bring substandard homes into to compliance with all applicable building and health and safety codes. Over the past two years, the Division has completed code enforcement activities that have resulted in improvements to approximately 290 housing units. Using this rate of improvements as an average, the Division will be able to rehabilitate approximately 1, 152 housing units over the next five years, reducing the number of houses needing rehabilitation from 5,500 to 4,348. Housing improvements within the Eastside area of Lodi have also been driven by the Eastside Improvement Committee, a community based group that continually monitors the neighborhood for substandard housing issues and coordinates improvement efforts accordingly.

Of the homes potentially requiring rehabilitation, those most likely to be dilapidated are mobilehomes constructed prior to 1970 (188 units) and other housing units constructed prior to 1940 (1,953 units). Of the latter, the City estimates that, at most, five percent (about 100 units) need replacement, so that the total estimated housing replacement need in Lodi is approximately 300 dwelling units.

Another measure of housing condition is the number of housing units lacking complete plumbing, kitchen, and heating facilities. According to the 2000 Census, 149 housing units in Lodi lacked completed plumbing facilities, 345 housing units lacked complete kitchen facilities, and 180 households relied on wood to heat their homes or had no heating systems. The Census did not report on the number of housing units that lacked two or more of these facilities, so the City cannot determine the extend of overlap in these numbers. It is likely that most of the housing units lacking complete plumbing, kitchens, and/or heating are older housing units that would be counted under the methodologies described above. There may be a few newer structures occupied illegally as housing units (such as converted garages, illegal second units, and similar structures), but the number of such structures is likely to be small and not significantly affect the maximum estimate of housing rehabilitation need.

To more accurately estimate housing rehabilitation and replacement need, the City could conduct a sample survey of exterior housing conditions in neighborhoods where a significant percentage of the housing was constructed prior to 1970.

C. Employment Trends

Employers providing the most jobs in Lodi, and countywide, are firms associated with the manufacturing, retail, health care, hospitality, and government sectors of the economy. These industries represent approximately 70 percent of the jobs available in Lodi. The 2000 Census indicates that only 36 percent of Lodi residents work in these industries, however. This illustrates the commuting nature of Lodi residents who work outside the City and the County. Lodi residents are not filling many jobs available in the City. Over half (55 percent) of Lodi residents commuted to jobs outside of the City in 2000 (See Table II-25).

Table II-24 compares employment by industry in Lodi and San Joaquin County.

Table II-24: Comparison of Employment (City of Lodi and San Joaquin County)

Industry	2002 California EDD Estimate (Jobs in San Joaquin County)		2000 Census (Jobs Held by Lodi Residents)	
Farming, Natural Resources, Mining	12,400	6.04%	1,239	5.1%
Construction	12,900	6.28%	2,052	8.5%
Manufacturing	20,200	9.83%	3,209	13.3%
Wholesale trade	6,900	3.36%	1,172	4.8%
Retail trade	24,500	11.93%	2,966	12.3%
Transportation, Warehousing, and Utilities	13,700	6.67%	1,273	5.3%
Information	3,000	1.46%	505	2.1%
Financial Activities	9,200	4.48%	1,214	5.0%
Broadcasting & telecommunications	--	--	--	--
Real estate & rental & leasing	3,000	1.46%	351	1.5%
Professional, scientific, & technical services	--	--	867	3.6%
Administrative & support	10,000	4.87%	840	3.5%
Educational services	3,700	1.80%	2,121	8.8%
Health care & social assistance	20,700	10.08%	2,525	10.4%
Arts, entertainment, & recreation	2,400	1.17%	306	1.3%
Leisure and Hospitality (Including foodservices)	15,700	7.64%	1,342	5.6%
Other services	6,500	3.16%	1,055	4.4%
Government	40,600	19.77%	1,140	4.7%
Total	**205,400**	**100.0%**	**24,177**	**100.0%**

Table II-25: Commuting Workers (2000)

Place of Work	Persons	Percent
Worked in City of Residence	10,627	44.8%
Worked Outside of City of Residence	13,089	55.2%
Total Workers	**23,716**	**100.0%**

Source: Census 2000

In 2001, nearly 18 percent of the work force in the Stockton-Lodi Metropolitan Statistical Area (San Joaquin County), held jobs related to office and administrative support, the largest

percentage for any occupational category. Occupations in this field are associated with average annual wages of $27,786. Other common occupations, such as in transportation, sales, and production, have average annual wages between $28,000 and $30,000.

Although these wages are for one person, and many households have two wage earners, the majority of employment opportunities for residents of Lodi are associated with incomes that are below the countywide median income. In San Joaquin County, the median family income for a family of three is $45,550. The median income for a family of four is $50,600 (based on estimates of income from the U.S. Department of Housing and Urban Development).

Table II-26 shows current employment by occupation for San Joaquin County.

Table II-26: Stockton-Lodi MSA Employment by Occupation

	2001 Employment Estimates	Percent of Total	Mean Annual Wage
Management Occupations	8,310	4.2%	$71,864
Business and Financial Operations Occupations	5,310	2.7%	$50,098
Computer and Mathematical Occupations	1,270	0.6%	$46,760
Architecture and Engineering Occupations	1,480	0.7%	$52,578
Life, Physical, and Social Science Occupations	1,070	0.5%	$46,061
Community and Social Services Occupations	3,050	1.5%	$39,736
Legal Occupations	700	0.4%	$68,613
Education, Training, and Library Occupations	13,850	7.0%	$39,852
Arts, Design, Entertainment, Sports, and Media Occupations	990	0.5%	$35,554
Healthcare Practitioners and Technical Occupations	7,750	3.9%	$58,358
Healthcare Support Occupations	5,370	2.7%	$22,241
Protective Service Occupations	4,760	2.4%	$38,091
Food Preparation and Serving-Related Occupations	13,960	7.1%	$17,089
Building and Grounds Cleaning and Maintenance Occupations	6,190	3.1%	$21,839
Personal Care and Service Occupations	3,270	1.7%	$21,708
Sales and Related Occupations	19,030	9.6%	$28,920
Office and Administrative Support Occupations	35,190	17.8%	$27,786
Farming, Fishing, and Forestry Occupations	6,360	3.2%	$16,697
Construction and Extraction Occupations	11,480	5.8%	$39,420
Installation, Maintenance, and Repair Occupations	8,780	4.4%	$36,898
Production Occupations	16,750	8.5%	$28,791
Transportation and Material Moving Occupations	22,500	11.4%	$29,056

Source: California Employment Development Department, Occupational and Wage Data, Revised January 2003

Major employers in Lodi (those with more than 100 employers) include:

- Manufacturers that produce a variety of products that include cereals, food mixes, wines, rubber products, steel framing and industrial shelving, foundry items, recreational vehicle components, electronic substrates, and plastic piping and injection molded products;
- Public agencies, such as the City of Lodi and the Lodi Unified School District;
- Health care services firms, such as Lodi Memorial Hospital and Blue Shield of California; and
- National retailers, such as Wal-Mart and Target.

Table II-27 lists the largest employers in Lodi as of June 30, 2001:

Table II-27: Major Employers in Lodi

Employer	Type of Employment	Number of Employees
Lodi Unified School District	Education	2,247
Blue Shield of California	Insurance Claims Processing	725
Lodi Memorial Hospital	Health Care	650
General Mills	Cereals and Food Mixes	575
Pacific Coast Producers	Can Manufacture and Cannery	530
City of Lodi	Government	387
Wal-Mart	General Merchant	226
Target	General Merchant	200
Valley Industries	Trailer Hitches	191
Farmers and Merchants	Banking	183

Source: City of Lodi, www.ci.lodi.ca.us

Lodi's unemployment rate is relatively low compared to the countywide rate and the other jurisdictions in the area. As discussed previously, Lodi has a high percentage of commuters which may contribute to the low rates of unemployment.

Table II-28 shows City and county rates of unemployment in 2000 for all of San Joaquin County.

Table II-28: County and City Unemployment Rates (2000)

Jurisdiction	Labor Force	Employment	Unemployment	
			Number	Rate
San Joaquin County	**278,200**	**247,100**	**31,100**	**11.2%**
Lodi	**32,500**	**29,800**	**2,700**	**8.3%**
Escalon	2,590	2,420	170	6.6%
Lathrop	4,090	3,490	600	14.6%
Manteca	24,830	22,600	2,230	9.0%
Ripon	4,550	4,190	360	7.8%
Stockton	115,140	100,010	15,130	13.1%
Tracy	22,100	20,030	2,070	9.4%

Source: California Employment Development Department, Labor Force Data for County Sub-Areas, March 2003; Labor Force Data for Counties, February 2003

D. Special Housing Needs

Certain groups in the City of Lodi encounter greater difficulty finding decent, affordable housing due to their special needs and/or circumstances. Special circumstances may be related to one's employment and income, family characteristics, medical condition or disability, and/or household characteristics. A focus of the Housing Element is to ensure that persons from all walks of life have the opportunity to find suitable housing in Lodi.

State Housing Element law identifies the following special needs groups: senior households, persons with disabilities, female-headed (particularly single-parent households), large households, farmworkers, and persons and families in need of emergency shelter. This section provides a discussion of housing needs for each particular group, and identifies the programs and services available to address their housing and supportive services needs.

There are no other groups identified in the Community Profile whose housing needs might be characterized as "special" needs.

1. Seniors

Senior households typically have special housing needs due to three primary concerns: 1) fixed, often low, incomes, 2) high health care costs, and 3) self-care or independent living limitations (such as health-related disabilities). According to the 2000 Census, 5,000 households in Lodi were headed by persons age 65 years and older. Half of these households consisted of persons who lived alone.

Approximately ten percent of individuals 65 years of age or older in Lodi had poverty-level incomes or less, which is less than poverty levels for the population as a whole. Nearly 62 percent of households headed by seniors, approximately 3,100 households, had low-incomes

(less than 80 percent of median), and 46 percent had very low-incomes (less than 50 percent of median), higher percentages than the overall population. This suggests that seniors may have limited capacity to absorb increases in housing-related expenses.

In 2000, 3,528 elderly households in Lodi were homeowners and 1,574 were renters. Because of physical and/or other limitations, senior homeowners may have difficulty in performing regular home maintenance or repair activities. In addition, because many seniors have fixed and/or limited incomes, they may have difficulty meeting monthly housing expenses. Elderly women are especially in need of financial assistance because so many of them live alone and they tend to have lower incomes than seniors as a group. In 2000, 38 percent of senior households living alone were women (1,901 households).

Various programs can help meet the needs of seniors, including congregate care, supportive services, rental subsidies, shared housing matching services, and housing rehabilitation assistance. For the frail elderly or those with disabilities, housing with features that accommodate disabilities can help ensure continued independent living. Elderly individuals with mobility/self care limitations also benefit from public and private transportation that provide access to needed services. Senior housing that combines supportive services, accessible features, and transportation assistance can allow more independent living.
According to the California Department of Social Services (2003), eleven licensed care facilities for seniors are located in Lodi. The facilities provide 529 beds for persons age 60 and above. There are also six adult residential facilities with a capacity of 121 persons that may be available for seniors. The Lodi Memorial Hospital operates an adult day care program with the capacity to attend to 30 clients. The City itself also administers various day care programs designed for its senior residents.

The Lodi Senior Citizens commission is active within the community by identifying the needs of seniors and initiating action to address the needs. In a public-private partnership, the City maintains and operates the Hutchins Street Square, a multi-purpose community center located in an old high school. The Square is home to both a senior center and an adult day care program specifically for the elderly.

2. Persons with Disabilities

Persons with disabilities typically have special housing needs because of their fixed or limited incomes, a lack of accessible and affordable housing that meets their physical and/or developmental capabilities, and higher health costs associated with their disabilities. A disability is defined broadly by state and federal agencies as any physical, mental, or emotional condition that lasts over a long period of time, makes it difficult to live independently, and affects one or more major life activities. The 2000 Census defines six disabilities: sensory, physical, mental, self-care, "go-outside-home," and employment. According to the 2000 Census, 11,789 Lodi residents had some type of disability, representing 23 percent of City residents. Of these persons, 3,344 people, or 28 percent, are age 65 years or older. Many individuals who reported disabilities did not necessarily have conditions requiring special housing features or supportive services to facilitate independent living. However, the large percentage of the population reporting some type of disability during the 2000 Census indicates the potential for such a need

To meet the unique housing needs of the disabled, the City offers and participates in various programs. Through the San Joaquin County Housing Authority, disabled households may receive rental assistance to help them afford housing in the community. Also, the County offers home improvement grants, which can be used to make upgrades/modifications to ensure accessibility. In addition, Lodi enforces state building code standards and model code requirements for accessibility in residential construction (Title 24 of the California Administrative Code).

Living arrangements for persons with disabilities depend on the severity of the disability. Many persons live independently with other family members. To maintain independent living, persons with disabilities may need special housing design features, income support, and in-home supportive services for persons with medical conditions.

Severely mentally ill persons are especially in need of assistance. Mentally disabled individuals are those with psychiatric disabilities that impair their ability to function in the community to varying degrees. The National Institute for Mental Health (2001) estimates that 2.5 percent of the adult (age 18+) population suffers from mental illness. If this percentage is applied to Lodi, over 1,000 persons may suffer from some form of mental illness within the city.

Many persons with disabilities can live and work independently within a conventional living environment. However, more severely disabled individuals require a group living environment in which partial or constant supervision is provided by trained personnel. The most severely affected individuals may require an institutional environment in which medical attention and therapy are provided within the living environment. According to the California Department of Social Services, Lodi is home to one licensed adult day care facility with a capacity to serve 30 clients. (Adult day care facilities are facilities of any capacity that provide programs for frail elderly and developmentally disabled and/or mentally disabled adults in a day care setting.)

3. Farmworkers

According to the 2000 Census, there were 1,239 Lodi residents (two percent of the city's total population) employed in farming, forestry, and fishing occupations. Although this is not a large resident farmworker population, Lodi is located within the larger agricultural region of San Joaquin Valley that employed approximately 12,400 farmworkers in 2002 who were permanent residents of the region.

Farmworkers traditionally are defined as persons whose primary incomes are earned through permanent or seasonal agricultural labor. Permanent farmworkers work in the fields, processing plants, or support activities on a year-round basis. When workloads increase during harvest periods, the labor force is supplemented by seasonal or migrant labor.

The Migrant Health Program of the U.S. Department of Health and Human Services released a study in 2000 estimating the number of migrant and seasonal farmworkers and their non-farmworker household members in California: *Migrant and Seasonal Farmworker Enumeration Profiles Study*. The study was based on secondary source material, including existing database information and interviews with knowledgeable individuals. The study indicates that San Joaquin County has an estimated 46,913 farmworkers, including 21,721 migrant and 25,192 seasonal farmworkers.

According to the California Department of Education, Lodi is located within a region (San Joaquin and Contra Costa counties) that was home in 2001 to 15,000 children of migrant farmworker families enrolled in 21 school districts. No detailed information is available for children of farmworker families specifically residing in Lodi. Although Lodi has few agricultural activities within its borders that would attract seasonal farm labor, it is possible that some of the students of migrant farmworker families live in the city.

Farmworkers' special housing needs typically arise from their very limited income and the often unstable, seasonal nature of their employment. Statewide surveys provide some insight into the demographic characteristics and housing needs of farmworkers. Among the major findings are:

- **Limited Income:** Farmworkers typically earn very low incomes. According to the Rural Community Assistance Corporation, three-fourths of California's farmworkers earned less than $10,000 a year in 2000. Only one out of seven earned more than $12,500.
- **Overcrowding:** Because of their very low incomes, farmworkers have limited housing choices and are often forced to double up to afford rents. A Statewide survey indicates that overcrowding is prevalent and a significant housing problem exists among farmworkers (The Parlier Survey, California Institute for Rural Studies, 1997).

- **Substandard Housing Conditions:** Many farmworkers live in overcrowded conditions and substandard housing, including shacks, illegal garage units, and other structures generally unsuitable for occupancy (The Parlier Study, 1997).

The majority of land within the City is developed with urban land uses; however, active agricultural land surrounds the City on all sides except to the north, which is bounded by the Mokelumne River. Agricultural land is located on the north side of the Mokelumne River as well. San Joaquin County has an active livestock and poultry industry, which does not create a demand for seasonal labor. However, some of the leading crops farmed in San Joaquin County are fruit and nut crops, vegetable crops, and nursery products, which have a high demand for seasonal labor. The need for seasonal labor, however, does not necessarily translate to a need for migrant farmworker housing within Lodi. San Joaquin County maintains three migrant centers, which provide housing from May to October and also provide day care, health care services, and educational opportunities for migrant farmworkers. The Harney Lane Migrant Center is located in the City of Lodi and provides seasonal housing for approximately 400 people. The San Joaquin Housing Authority also maintains two migrant farmworker centers outside of the City of Lodi, in the community known as French Camp. Both the Joseph J. Artesi Migrant Center II and Migrant Center III provide housing and additional support services to approximately 95 families each for six to nine months out of the year. These centers are located approximately 15 miles south of Lodi.

Some of the migrant farmers who formerly moved from state to state or from Mexico to California to pursue agricultural employment may have now become permanent residents of Lodi. As such, the housing needs of farmworkers are primarily addressed through the provision of permanent affordable housing, rather than migrant farm labor camps. Their housing need would be the same as other lower-income households and large families who are in need of affordable housing with three or four bedrooms.

4. Female Householders with Children

Single-parent households with children often require special consideration and assistance as a result of their greater need for affordable housing, accessible day care, health care, and a variety of other supportive services. Single-parent households also often receive unequal treatment in the rental housing market due to their family status. These special needs particularly affect female householders with children because their incomes tend to be so much lower than male householders, women with children comprise the overwhelming majority of single-parent households, and most female householders with children require assistance with child care but cannot afford to pay for child care.

Lodi is home to 2,250 single-parent households, of which nearly three-quarters (1,629) are headed by females. In 2000, 24 percent of the city's female-headed families with children lived in poverty, compared to 19 percent of all families with children. The median income for female-headed households with children was $20,143, compared to $53,793 for married-couple families.
Battered women with children comprise a sub-group of female-headed households that are especially in need. In the Lodi area, several social service providers and emergency housing facilities serve women in need, including the Women's Center of San Joaquin County and the Lodi House Hope Closet.

5. Large Households

Large households are defined as households having five or more members. These households constitute a special need group because of an often limited supply of adequately sized, affordable housing units. Because of rising housing costs, families and/or extended families are sometimes forced to live together under one roof. The 2000 Census reported 2,770 large households in Lodi, 54 percent of which were renter households. Large households represent 13 percent of the city's households.

The housing needs of large households could be met by larger units with more bedrooms. Because larger homes typically cost more, lower-income large households may reside in smaller units, likely resulting in overcrowding. The high percentage of large families (particularly large renter families), when considered in conjunction with rising overcrowding and overpayment, suggests that a growing number of Lodi families cannot find affordable housing of adequate size.

To address overcrowding, the City is working to develop housing opportunities for larger households to relieve overcrowding and is promoting affordable ownership housing opportunities (such as first-time homebuyer and self-help housing programs) to help renters achieve homeownership.

6. Homeless

Most individuals and families become homeless because they are unable to afford housing in a particular community and/or unable to care for themselves. Beyond the need for housing, homeless individuals frequently have other needs, such as support services, life skills training, medical care, and education or job skills training. Nationwide, about half of those experiencing homelessness over the course of a year are single adults. Most enter and exit the system fairly

quickly. The remainder essentially lives in the homeless assistance system, or in a combination of shelters, hospitals, the streets, jails, and prisons. There are also single homeless people who are not adults, including runaway and "throwaway" youth (children whose parents will not allow them to live at home or who are unable to care for them).

Lodi is located just north of Stockton, along State Route 99. Stockton is home to most of the countywide social services centers because it is the county seat of San Joaquin County and the largest city. There has been no formal count of the homeless population attempted in Lodi, although the Salvation Army estimated in the mid 1990s that Lodi had a resident homeless population of between 75 and 100 individuals (1995 San Joaquin County Consolidated Plan).

The Salvation Army and several other non-profit organizations operate facilities directed at assisting homeless people, including families and children in Stockton. Given the distance between Lodi and Stockton, it is likely that the majority of people who find themselves in need of assistance seek it within Stockton. The Salvation Army facility is currently being upgraded to provide additional assistance to the resident population of Lodi. There is no information to suggest that Lodi is in need of additional homeless facilities above those improvements already being made.

Table II-29 lists homeless facilities in the City of Lodi. The three facilities listed below are homeless shelters that serve Lodi, although users of these services come from throughout the region. The Salvation Army indicated that the Archway Shelter is currently being moved to a larger facility in Lodi so that it can accommodate services for women and children. Supportive service programs for homeless persons operating in Lodi include Alcoholics Anonymous and several drug treatment programs.

Table II-29: Homeless Facilities/Providers in the City of Lodi

Facility/Provider	Type	Capacity	Services
Salvation Army – The Archway Shelter 19 North Sacramento Street Lodi, CA 95240	Emergency shelter	63 beds	Men's services only, food, bed, clothing, medical
Women's Center of San Joaquin County – Lodi Office 29 S. Washington Street Lodi, CA 95241	Resource Center	45 beds	Crisis line, counseling, emergency shelter, safe house, legal assistance,
Lodi Memorial Hospital, Salvation Army Clinic Lodi, CA 95429	Medical Clinic	--	Free medical care, treatment

Source: Cotton/Bridges/Associates, April 2003.

In addition to shelter facilities, a partnership of the San Joaquin County Community Action Agency, County Department of Aging, and Children's and Community Services operates the

Lodi Community Center. The Center budgets approximately $2,000 per year for motel vouchers. The average length of stay is three days, with efforts made to find shelter space for homeless families. Emergency food is provided with counseling and case management services. The City also provides travel vouchers, through the Community Center, for senior citizen and other low-income residents to use Dial-A-Ride services to help meet their transportation needs.

E. Analysis of Assisted Housing Projects At-Risk

1. Analysis of Assisted Rental Housing Projects at Risk of Conversion

Existing rental housing that receives governmental assistance is a significant source of affordable housing that should be preserved, to the extent feasible. The loss of such rental units reduces the availability of housing affordable to very low- and low-income households. It is far more cost-effective to preserve existing affordable housing than to replace it with newly constructed units, unless housing has reached a substantial level of deterioration.

This section of the Housing Element identifies publicly assisted rental housing in Lodi, evaluates the potential of such housing to convert to market rate units during a ten-year planning period (January 2003 to July 2013), and analyzes the cost to preserve or replace those units. Resources for preservation/replacement of these units and housing programs to address their preservation are described in Section IV of the Element.

Table II-30 lists the two publicly assisted multi-family rental housing projects in Lodi.

Table II-30: Inventory of Publicly Assisted Rental Housing

Project Name	Total Units	Affordable Units	Household Type	Funding Source(s)	Earliest Expiration of Affordability (At Risk Status)
Central Apartments 1036 Central	12	3	Family	Section 221(d)(4);Section 8	Prepaid/ Opted Out
Creekside South Apartments 601 Wimbledon Dr	40	40	Family	Section 236(j)(1); Section 8	February 2003 (At Risk)
Total	**52**	**43**			

Sources: California Housing Partnership Corporation, 2002; U.S. Department of Housing and Urban Development. 2003.

In addition to these two rental housing developments, the U.S. Department of Agriculture lists a 96-unit migrant labor housing facility as being located in Lodi. This seasonal farm labor camp is

actually located east of Lodi, in the unincorporated area of San Joaquin County, on Harney Lane between North Jack Tone Road and North Tully Road.

2. Loss of Assisted Housing

Affordability covenants and deed restrictions are typically used to maintain the affordability of publicly assisted housing, ensuring that these units are available to lower-income households in the long term. Over time, the City may face the risk of losing some of its affordable units due to the expiration of covenants and deed restrictions. If market rents continue to increase, property owners may be inclined to discontinue public subsidies and convert the assisted units to market-rate housing.

According to data compiled by the California Housing Partnership Corporation (March 2003), the owner(s) of the 12-unit Central Apartments had opted out of the Section 8 program and prepaid the HUD-insured mortgage. The other federally assisted project in Lodi, the 40-unit Creekside South Apartments, is at risk of conversion because its Section 8 contract was to expire in February 2003. As of May 2003, the property owner is still operating the project under Section 8 Program contract restrictions, but could opt to convert the project to market rate housing during the period covered by this Housing Element (2003 to 2009).

3. Preservation and Replacement Options

a. Overview

To maintain the existing affordable housing stock, the City can either preserve the existing assisted units or facilitate the development of new units. Depending on the circumstances of at-risk projects, different options may be used to preserve or replace the units. Preservation options typically include: 1) transfer of project to non-profit ownership; 2) provision of rental assistance to tenants using non-federal funding sources; and 3) purchase of affordability covenants. In terms of replacement, the most direct option is the development of new assisted multi-family housing units. These options are described below.

b. Transfer of Ownership

Transferring ownership of an at-risk project to a non-profit housing provider is generally one of the least costly ways to ensure that at-risk units remain affordable for the long term. By transferring property ownership to a non-profit organization, low-income restrictions can be secured indefinitely and the project would become potentially eligible for a greater range of governmental assistance. This preservation option is a possibility for the Creekside South Apartments.

The potential acquisition cost of rental units at risk in Creekside South Apartments is based on the estimated market value of the 40 rental units (See Table II-31). Current market value of the units is estimated on the basis of a project's potential annual income, and operating and maintenance expenses. As indicated below, the estimated market value of Creekside South is approximately $2.8 million.

Table II-31: Estimated Market Value of Creekside South Apartments

Project Information	Creekside South
1-bedroom Units	16
2-bedroom Units	24
Total Units	40
Annual Operating Cost	$120,000
Annual Gross Income	$379,200
Net Annual Income	$259,200
Estimated Market Value	$2,851,200

Market value for project is estimated with the following assumptions:

1. In Lodi, current market rents (April 2003) are approximately $670 for a one-bedroom unit and $870 for a two-bedroom unit (Source: Springstreet.com April 2003).
2. Average unit size is estimated at 600 square feet for a one-bedroom unit and 850 square feet for a two-bedroom unit.
3. Vacancy rate is assumed at 0% as the project is currently fully occupied.
4. Annual operating expenses per square foot are estimated to be $4.00.
5. Market value = Annual net project income x multiplication factor.
6. Multiplication factor for a building in moderate condition is 11.

c. Rental Assistance

Rental subsidies using non-federal (State, local or other) funding sources can be used to maintain affordability of the 40 at-risk units. These rent subsidies can be structured to mirror the federal Section 8 program. Under Section 8, HUD pays the difference between what tenants can pay (defined as 30% of household income) and what HUD estimates as the fair market rent (FMR) on the unit. In San Joaquin County, the 2003 FMR is $569 for a one-bedroom unit and $731 for a two-bedroom unit.

The feasibility of this alternative is highly dependent upon the availability of non-federal funding sources necessary to make rent subsidies available and the willingness of property owners to accept rental vouchers if they can be provided. As indicated in Table II-32, the total cost of subsidizing the rents at all 40 at-risk units is estimated at $12,618 per month or $151,416 annually.

Table II-32: Rental Subsidies Required

Unit Size	Total Units [1]	Fair Market Rent[2]	Household Size	Very Low Income (50% AMI)[3]	Affordable Cost – Utilities[4]	Monthly Per Unit Subsidy	Total Monthly Subsidy
1-br	16	$569	1	$17,700	$343	$227	$3,624
2-br	24	$731	2	$20,050	$356	$375	$8,994
Total	40						$12,618

1. Creekside South Apartments consist of 16 one-bedroom units and 24 two-bedroom units.
2. Fair Market Rent is determined by HUD for different jurisdictions/areas across the U.S on an annual basis.
3. 2003 Area Median Household Income (AMI) limits set by HUD. In San Joaquin County, the area median income limit for a very low-income household is $17,700 for a one-person household and $20,250 for a two-person household.
4. Affordable cost = 30% of household income minus estimated utility allowance of $100 for a one-bedroom unit and $150 for a two-bedroom unit.

d. Purchase of Affordability Covenants

Another option to preserve the affordability of the at-risk project is to provide an incentive package to the owner to maintain the project as affordable housing. Incentives could include writing down the interest rate on the remaining loan balance, and/or supplementing the Section 8 subsidy received to market levels. The feasibility of this option depends on whether the complex is too highly leveraged. By providing lump sum financial incentives or on-going subsidies in rents or reduced mortgage interest rates to the owner, the City can ensure that some or all of the units remain affordable.

e. Construction of Replacement Units

The construction of new affordable housing units is a means of replacing the at-risk units should they be converted to market-rate units. The cost of developing housing depends upon a variety of factors, including density, size of the units (i.e. square footage and number of bedrooms), location, land costs, and type of construction. Assuming an average development cost per housing units of $143,500[1], it would cost approximately $5.7 million to construct 40 new assisted units.

Cost Comparisons

The above analysis attempts to estimate the cost of preserving the at-risk units under various options. The cost of acquiring Creekside South Apartments and transferring it to a non-profit organization is high ($2.8 million). In comparison, the annual costs of providing rental subsidies required to preserve the 40 assisted units are relatively low ($151,416). However, long-term affordability of the units cannot be ensured in this manner. The option of constructing 40

[1] Assumes an average unit size of 650 square feet, construction cost of $90 per square foot (approximately $58,500 per unit), and development ready land cost of $50,000 per unit, and other costs of $35,000 per unit.

replacement units is the most costly alternative ($5.7 million, excluding land costs) and constrained by a variety of factors, including growing scarcity of land, rising land costs, and potential neighborhood opposition. The best option to preserve the at-risk units appears to be the purchase of affordability covenants.

4. Organizations Interested in Preserving Assisted Rental Housing

The preservation of affordable rental housing at risk of conversion to market rate housing can be assisted by non-profit organizations with the capacity and interest to acquire, manage, and permanently preserve such housing. The California Department of Housing and Community Development (HCD) maintain a list of interested non-profit organizations. A number of organizations have expressed an interest in preserving affordable rental housing in San Joaquin County, including:

- ACLC, Inc, 42 N. Sutter Street, Suite 206, Stockton, CA 95202, (209) 466-6811
- Christian Church Homes of Northern California, Inc, 303 Hegenberger Road, Suite 201, Oakland, CA 94621, (510) 632-6714
- Community Home Builders and Associates, 675 N. First Street, Suite 620, San Jose, CA 95112, (408) 977-1726
- Eden Housing, Inc, 409 Jackson Street Hayward, CA 94544, (510) 582-1460
- Eskaton Properties, Inc, 5105 Manzanita Avenue, Carmichael, CA 95608, (916) 334-0810
- Foundation for Affordable Housing, Inc, 2847 Story Road, San Jose, CA 95127, (408) 923-8260
- Housing Corporation of America, 31423 Coast Highway, Suite 7100, Laguna Beach, CA 92677, (323) 726-9672
- Rural California Housing Corp, 2125 19th Street, Suite 101, Sacramento, CA 95818, (916) 442-4731
- Senior Housing Foundation, 1788 Indian Wells Way, Clayton, CA 94517, (925) 673-0489
- Stockton Shelter for the Homeless, P.O. Box 4803, Stockton, CA 95204, (209) 465-3612

F. Opportunities to Promote Sustainable Development

1. Energy Conservation

Energy costs directly affect housing affordability through their impacts on the construction, operation, and maintenance of housing. There are many ways in which the planning, design, and construction of residential neighborhoods and structures can foster energy conservation to reduce this cost impact. Techniques for reducing energy costs include construction standards for energy efficiency, energy-saving community design alternatives, the layout and configuration of residential lots, and the use of natural landscape features to reduce energy needs.

a. Residential Construction Standards

The State of California has adopted building standards for energy efficiency that apply to newly constructed dwellings and residential additions. Title 24 of the California Code of Regulations sets forth mandatory energy efficiency standards that can be achieved through prescriptive means or through compliance with a maximum "energy budget." Prescriptive means include the

use of appliances, building components, insulation, and mechanical systems that meet minimum energy efficiency ratings. Local governments implement state energy standards as part of their building code enforcement responsibilities.

b. Building Design

Building design can significantly affect residential energy demand. Compact housing forms, such as terraces, attached housing, town homes, and low-rise apartments, are more energy efficient than single-family detached dwellings. Compact housing forms share walls, which makes interior hearing and cooling more efficient, and reduces the amount of interior space that requires heating or cooling.

Other examples of energy saving design are: 1) locating homes on the northern portion of the sunniest location of building sites; 2) designing structures to admit the maximum amount of sunlight into the building and to reduce exposure to extreme weather conditions; 3) locating indoor areas of maximum usage along the south face of the building and placing corridors, closets, laundry rooms, power core, and garages along the north face; 4) making the main entrance a small enclosed space that creates an air lock between the building and its exterior; 5) orienting the entrance away from winds or using a windbreak to reduce the wind velocity against the entrance; and 6) using large amounts of concrete, masonry, tile, and/or stone for indoor surfaces to absorb heat during the day and release it at night.

c. Community and Site Planning Techniques

Community and site planning techniques, the use of landscaping, and the layout of new developments can also reduce energy consumption associated with residential development through reductions in heating and cooling needs, opportunities to use non-motorized methods of transportation, and reductions in energy inputs to the development of housing. Techniques that have been used successfully in many communities are described below.

- **Reduced street widths.** Urban areas with high proportions of built and paved surface areas have higher daytime peak temperatures and higher average nighttime temperatures. In a mild climate with warm summers, such as in Lodi, these higher temperatures are not beneficial. Reduced street widths can save energy, without sacrificing community safety, by reducing daytime temperature peaks and average nighttime temperatures. Narrower streets also result in savings to consumers by reducing development costs.

- **More street trees.** Street trees provide shade for the built environment. Mature trees, in particular, can help moderate outdoor temperatures in warm climates by releasing moisture into the atmosphere and shading paved surfaces from the sun during the hottest parts of the day. Trees also moderate indoor temperatures by reducing solar gain, the absorption of solar energy by buildings that results in higher interior temperatures.

- **Modified street lighting.** Reduced street lighting and low-energy lighting standards can also save on energy and development costs. For example, some communities require street lighting only at intersections, at right-angle corners, and at the corners of cul-de-sacs.

- **Piping for a community heating and cooling system.** Subdivisions can be designed to incorporate a central irrigation pipeline, buried beneath a central area, to which individual homes can be connected. The irrigation pipe caries water that can be used as a heat source during the winter and as a heat sink (source of heat absorption) during the summer to help cool residences. The heating/cooling potential of a central irrigation pipeline is accessed through heat pumps in each home.

- **Lot orientation for energy conservation.** Access to sunlight, and orientation of homes with respect to the sun's path, are important considerations in configuring residential lots to reduce energy use. For example, the number of lots that promote good solar orientation and access can be increased on an east-west street by providing narrow lots perpendicular to the street on the north side and wider lots oriented with their long-axes either north-south or east-west on the south side of the street. Buildings can be located and oriented to take advantage of airflow during hot days, thereby reducing the need for mechanical cooling.

- **Use of natural site characteristics.** Energy-conserving design considers natural topography and opportunities to use natural or planted vegetation to lower energy use. Lots can be configured, and residential structures oriented, on vegetated, sloped sites so that solar exposure and protection from cold winds are increased during the winter and protection from the sun is provided during the summer.

d. General Plan Goals and Policies

Lodi's General Plan contains a goal within the Circulation Element to reduce reliance on the automobile and encourage a reduction in regional vehicle miles. The six policies related to the goal emphasize implementation of a rideshare program, employment opportunities in the City, and mixed use developments that provide rights-of-way to pedestrian and non-vehicular traffic. These policies may result in a reduction of the reliance on motorized vehicles, which would also result in reduction of energy consumption.

e. Resources for Energy Conservation

The City of Lodi operates its own electric utility, Lodi Electric Utility, which provides residential, commercial, and industrial electric service. Energy conservation in residential development is a direct interest of the City, therefore. Lodi Electric Utility offers several programs to reduce residential energy use, including:

- Residential Energy Survey Program, which helps residents identify major energy uses and how these can be reduced;
- Residential Appliance Rebate Program, which provides rebates on the purchase of new, energy-efficient appliances;
- Energy Efficient Home Improvement Program, which offers rebates on other types of energy efficient residential systems (fans, space conditioning, insulation, thermostats, windows, etc.);
- Housing-As-A-System Inspection Program, which uses diagnostic equipment to analyze mechanical and air delivery/duct systems and includes an inspection of attic insulation and windows; and

- A residential energy conservation demonstration program, in which a single-family home has been fitted with the latest energy conservation technology and is open to public tours to promote energy saving features.

Pacific Gas & Electric provides a variety of energy conservation services for residents and also participates in several other energy assistance programs for lower income households, which help qualified homeowners and renters, conserve energy and control electricity costs. These programs include the California Alternate Rates for Energy (CARE) Program and the Relief for Energy Assistance through Community Help (REACH) Program.

The California Alternate Rates for Energy Program (CARE) provides a 15 percent monthly discount on gas and electric rates to income-qualified households, certain nonprofit-operated facilities housing agricultural employees, homeless shelters, hospices, and other qualified non-profit group living facilities.

The REACH Program provides one-time energy assistance to customers who have no other way to pay their energy bills. The intent of REACH is to assist low-income customers, particularly the elderly, disabled, sick, working poor, and the unemployed, who experience severe hardships and are unable to pay for their necessary energy needs.

2. Transit-Oriented Development

The City of Lodi operates its own public transit system, Lodi Transit. The transit system provides:

- Full-sized buses on seven traditional fixed routes;
- The "Grapeline" service, offering five fixed routes to downtown, major shopping and recreational areas, medical facilities, the community center, schools and worksites;
- Transit links to South County Transit and San Joaquin County Regional Transit systems;
- Dial-a-Ride shuttle service, which is available to all residents on an advanced reservation basis; and
- A multi-modal transit facility at the train depot.

By operating its own transit system, Lodi can closely coordinate land use and transit planning decisions. This coordination provides the City with an opportunity to focus higher density and transit-oriented mixed-use developments along transit corridors, both in areas with infill and re-use potential and in new growth areas. Coordinated planning of transit and land uses contributes to the achievement of a sustainable community by providing Lodi residents and workers with more transportation alternatives to private vehicles. Coordinated planning also supports the continued viability and expansion of public transit by increasing the potential customer base.

State legislation that took effect in 2002 removed regulatory barriers and created new incentives for transit-oriented infill development. This legislation provides further opportunities for Lodi to promote higher density development in residential and mixed-use projects. The state law, SB 1636 (2002), promotes infill development by allowing cities and counties to create "infill opportunity zones" near transit stops. Local governments can exempt developments within these zones from compliance with certain traffic mitigation requirements of the California

Congestion Management Act and/or permit the use of alternative mitigation measure to address traffic and transportation impacts. Without the exemptions and flexibility provided by state law, transit-oriented developments might have to provide street improvements and other traffic mitigation measures that could discourage pedestrian, bicycle, and transit use and reduce the financial feasibility of higher density infill development.

G. Future Housing Needs

According to the San Joaquin Council of Governments (SJCOG), Lodi is responsible for accommodating 4,014 additional housing units between 2001 and 2009, of which 1,654 units should be affordable to very low- and low-income households, approximately 41 percent of Lodi's total share of regional housing needs. The SJCOG determines the amount of affordable housing the county will need for the time period and then divides that housing among its participating jurisdictions.

Lodi is not responsible for actual construction of these units. However, Lodi is responsible for creating a regulatory environment in which these housing units can be built. This includes the creation, adoption, and implementation of general plan policies, zoning code policies, and/or economic incentives to encourage the construction of these kinds of units. Table II-33 shows the number and percentage of housing units identified in the Regional Housing Needs Allocation Plan for Lodi for the planning period of 2001 through 2009 by income category.

Table II-33: San Joaquin Council of Governments Regional Housing Allocation Plan (2001 to 2009)

Income Category	RHNA Allotment	
	Percent	Number of Units
Very Low	24.7%	990
Low	16.5%	664
Moderate	18.4%	738
Above Moderate	40.4%	1,622
Totals	**100.0%**	**4,014**

Source: SJCOG RHNA 2001-2009

Table II-34 shows number of units that have been constructed, are being constructed, or are approved future developments within the City of Lodi that will contribute to the allocation goals identified in Table II-34 above. The table below also shows how many more housing units remain to be built to meet the entire allocation.

Table II-34: Progress in Meeting Regional Housing Allocation Plan

Income Level	SJCOG RHNA Allocation	Units Constructed/Approved[1]	Remaining Allocation
Units Constructed/Under Construction January 2001 – May 2003			
Very Low	990	0	990
Low	664	1	663
Moderate	738	14	724
Above Moderate	1,622	747	875
Total	**4,014**	**755**	**3,259**

Source: City of Lodi

1. Low-income number based on one mobilehome; moderate-income number based on 14 duplex units; above moderate-income number based on 747 market price single-family homes.

III. RESOURCES AND CONSTRAINTS

A. Resources

1. Available Land to Accommodate Housing

a. Overview

Land on which to construct housing is one of the most critical resources necessary to meet future housing demand. Without adequate vacant or underutilized land, the City of Lodi cannot demonstrate how it will accommodate its share or regional housing needs (see Section G of Chapter II). The amount of land required to accommodate future housing needs depends on its physical characteristics, zoning, availability of public facilities and services, and environmental conditions.

b. Definition of "Adequate Sites"

To determine whether the City has sufficient land to accommodate its share of regional housing needs for all income groups, Lodi must identify "adequate sites." Under state law (California Government Code section 65583[c][1]), adequate sites are those with appropriate zoning and development standards, with services and facilities, needed to facilitate and encourage the development of a variety of housing for all income levels. The California Department of Housing and Community Development, in its guidelines that interpret state law (Housing Element Questions and Answers, Question #23) states that:

The locality's sites are adequate if the land inventory demonstrates sufficient realistic capacity at appropriate densities and development standards to permit development of a range of housing types and prices to accommodate the community's share of the regional housing need by income level. A two-part analysis is necessary to make this determination:

Can the realistic development capacity of suitable land, which is or will be served by facilities and infrastructure, accommodate the locality's total new construction need by income group over the next five years?

Are these available sites appropriately zoned (considering local development standards and land costs) for a variety of housing types (single-family, multifamily, mobile homes, etc.) and at appropriate densities to facilitate the development of housing to meet the locality's regional housing need by income level category, including the need for very low- and low-income households?

c. Relationship of Zoning Standards to Adequate Sites

The extent to which the City has "adequate sites" for housing affordable to very low- or low-income households will depend, in part, on zoning standards, particularly the maximum allowed density, parking, building coverage, height, and set-back standards. The adequacy of sites will also depend on whether the City grants exceptions or variances to these requirements to reflect the challenges of building on small, irregularly-shaped parcels, thereby reducing development costs and increasing development capacity. As documented in Chapter III (Section B, Governmental Constraints) the City has granted such exceptions and variances in the past to permit full utilization of infill parcels.

The combination of the city's flexible zoning standards, allowances for housing on commercial properties and a history of approving housing, planned development provisions, and a history of granting exceptions and variances suggests that Lodi can accommodate its remaining share of regional housing needs on sites available within the existing City limits and in new growth areas on the west side (including the Westside Facilities Master Plan area) to be annexed into the City.

d. Vacant Land Inventory

As part of the 2003 Housing Element update, an analysis of the residential development potential was conducted within the existing City limits and in four areas adjacent to the City that will be annexed during the timeframe covered by the Housing Element. City staff performed a parcel-specific vacant and underutilized sites analysis within the City limits and the areas to be annexed. Based on the analysis, the City concluded that it could accommodate more than its share of San Joaquin County Housing Needs (4,014 housing units between 2001 and 2009), as shown in Table II-32. Most of the City's residential development potential is located in two areas west of the current City limits that will be annexed to the Lodi during the planning period and to which public and services will be extended.

As shown in Tables III-1A, III-1B and III-2, Lodi has sufficient vacant and underutilized land to accommodate its remaining share of San Joaquin County future housing needs for all income groups at an average build out of between 65 and 100 percent of the maximum residential density permitted by zoning, depending on site conditions. This assumption is consistent with recent development trends for both single-family and multifamily projects, although density bonuses are possible for projects containing affordable housing, and one such project received a density bonus, as noted in Section IV, Summary of Achievements.

Table III-1A: Lodi Land Inventory (Annexation Areas)

General Plan Category	Average Density	Acres	DUs
LDR (Low Density)	5/acre	371.4	1,857
MDR (Medium Density)	15/acre	45.1	677
HDR (High Density)	20/acre	123.5	2,470
Total	**9.8/acre**	**510.8**	**5,004**

Source: City of Lodi (July2003)

Note: All parcels are greater than five acres. The estimate of acreage by General Plan land use designation is based on the Westside Facilities Master Plan assumptions for residential lands.

Table III-1B: Lodi Land Inventory by Property (Annexation Areas)

Property	GP Designation	Potential Housing Units
Westside Area	LDR	730
Westside Area	MDR	225
Westside Area	HDR	960
SouthWest Gateway	LDR	851
SouthWest Gateway	MDR	392
SouthWest Gateway	HDR	1,310
14500 – 14520 Peterson	LDR	130
14500 – 14520 Peterson	MDR	60
14500 – 14520 Peterson	HDR	200
2000+ Harney Lane	LDR	146
TOTAL		**5,004**

Source: City of Lodi (July2003)

Table III-2: Lodi Land Inventory and Dwelling Units Potential (Current City Limits)

Zone	Max. Density	Parcels <1 Acre			Parcels 1 – 5 Acres			Parcels 5+ Acres			DUs
		#	Acres	DUs*	#	Acres	DUs*	#	Acres	DUs*	
R-1	7/acre	63	11.8	63				2	12.4	84	147
R-2	7/acre	274	40.9	275	1	3.7	25	5	56	294	594
R-GA	20/acre	1	0.1	1							1
R-MD	30/acre							1	18.2	364	364
R-C-P	30/acre	1	0.4	2				1	8	78	80
PD	9.75/acre	60	8.6	60	2	7.5	73	1	40	390	523
FP	N/A	1	0.3	1							1
Total		**400**	**62.1**	**402**	**3**	**11**	**98**	**10**	**164.6**	**1,210**	**1,710**

Source: City of Lodi (July 2003)

Notes:

* = Dwelling unit potential is derived from maximum densities on unmapped properties and actual approved lots on properties with approved maps but not yet constructed.

R-1 = low density single-family

R-2 = low density single-family

R-LD = low-density multifamily (two- to four-family dwellings)

R-GA = garden apartment residential

R-MD = medium density multifamily residential

R-C-P = residential-professional-commercial office district

PD = planned development district; residential density is based on the PD approval applicable to the subject property. PD parcels less than one acre in size are assumed to develop at lower densities.

FP = floodplain

Affordability by Income Group. Based on land, construction, and other development costs presented in the non-governmental constraints analysis (subsection B-2), the City has concluded land zoned R-1 and R-2 will result in the production of housing affordable to moderate and above moderate-income households only, except in a few instances where homebuyer assistance is provided, builder incentives and subsidies are offered in exchange for below-market rate housing, homes are constructed under a self-help housing program, or second units are created. Housing constructed in the RLD and RGA zones could be affordable to either low- or moderate-income households. Housing constructed in the R-MD, R-HD, and commercial zones that permit residences could potentially be affordable to both very low- and low-income households with adequate construction subsidies.

For the annexation areas, the City has assumes that land designated LDR (low density residential) will result in the production of housing potentially affordable to above moderate-income households, that land designated MDR (medium density residential) will result in the production of housing potentially affordable to moderate-income or low-income households, and that land designated HDR (high density residential) will result in the production of housing potentially affordable to low- or very low-income households.

In addition to the residential and planned development lands provided in the above tables, there are opportunities for additional residential development on underutilized commercial and industrial sites. Areas along Cherokee Lane, North Sacramento Street and South Sacramento Street have properties which may be suitable for future residential development, if sufficient land can be consolidated to make such actions feasible. Both of these areas are characterized by obsolete patterns of land development, older structures in substandard condition, odd-sized lots, and marginally viable commercial and industrial uses in some cases that would make properties ripe for improvement from new development in the next five to ten years. In order to ensure that future re-use of these areas is consistent with the housing and community goals of Lodi, a Specific Plan or Area Plan should be created to establish guidelines for such re-use. Because this type of improvement is not necessary at this time to meet regional housing needs, the decision to create such a plan should be part of a future planning effort during the 2003 – 2009 planning period.

Public Facilities, Services, and Environmental Considerations. All of the properties listed in Tables III-1 and III-2 can be provided with water, sewer, drainage, other City facilities and services between 2003 and 2009. City services exist on lots within the current City limits, and services can be extended to the annexation areas to the west of the City according to the Westside Facilities Master Plan (see Section III-B for more information on public services and facilities). As has been the City's historic practice in annexing land, the City maintains sufficient capacity in the major facilities that store, process, and transport water, wastewater, and storm water, but require developers to incrementally extend utility lines through the impact fees they pay. Parks, schools, emergency services facilities, and other public facilities are also extended in this manner. To date, the extension of public facilities and services has not created a barrier to the annexation and readying of land for development to meet future housing needs.

Sites for Special Needs Housing. Sites included in the land inventory that can accommodate alternative and special needs housing are:

- Mobile home parks are permitted as conditional uses in the R-MD and R-HD zones only. The City will need to revise its zoning requirements to permit mobilehome parks in all residential zones.
- Residential care facilities (group homes) are permitted in all residential zones, except that some zones require a conditional use permit. The City will need to amend its zoning requirements to conform to state law regarding small group homes.
- Transitional housing and emergency shelters are not defined in the Zoning Ordinance, but have been permitted in commercial zones (three are three homeless facilities currently operating in Lodi). The City could consider whether certain types of small emergency shelter and transitional housing uses are appropriate for multifamily zones.
- Second units are permitted in all residential zones, although subject a conditional use permit in the R-1, R-2, and R-LD zones. The City will need to amend its zoning requirements to conform to state law requirements that require second units to be permitted by right in residential zones.
- Farmworker housing is not a defined use, per se, in the Zoning Ordinance, but has been allowed in the past in Lodi in all residential zones subject to the same development standards as other housing. Farm labor camps (seasonal housing for non-resident farmworkers) are permitted in agricultural zones in the County.

2. Administrative Resources

Described below are public and non-profit agencies that have been involved or are interested in housing activities in Lodi. These agencies play important roles in meeting the housing needs of the community. In particular they are or can be involved in the improvement of the housing stock, expansion of affordable housing opportunities, preservation of existing affordable housing, and/or provision of housing assistance to households in need.

Housing Authority of San Joaquin County (HASJC): HASJC offers programs to assist very low to moderate-income households with their housing costs, including the Section 8 rental assistance program, public housing, and migrant farmworker housing. Specifically, HASJC manages five public housing projects and three migrant farm labor housing developments throughout San Joaquin County. In addition, HASJC provides the Family Self-Sufficiency Program, supportive services centers, and the Resident Construction Program.

Habitat for Humanity San Joaquin County: Habitat for Humanity is a non-profit, faith-based organization dedicated to building affordable housing and rehabilitating homes for lower income families. Habitat builds and repairs homes with the help of volunteers and partner families. Habitat homes are sold to partner families at no profit with affordable, no-interest loans. Volunteers, churches, businesses, and other groups provide most of the labor for the homes. Government agencies or individuals typically donate land for new homes.

Salvation Army Shelter: The Salvation Army operates a 63 bed men's shelter in Lodi, which includes food, clothing, and medical services. This shelter is available only to men in the community, and is expected to continue to provide service to Lodi residents into the future.

Mercy Housing California (MHC): MHC is a non-profit developer that provides affordable housing for families, seniors, formerly homeless persons, individuals with HIV/AIDS and persons with chronic mental illnesses and physical impairments. With the assistance of public

and private funding, MHC builds or rehabilitates housing to meet community needs. The types of housing developed include multi-unit rental apartments and single-family homes, single room occupancy apartments for formerly homeless adults, and handicap-accessible units for individuals with physical impairments.

Rural California Housing Corporation (RCHC): RCHC was formerly a separate non-profit organization created to develop homeownership opportunities for low-income households using the self-help development process. RCHC was one of the earliest grantees under the then FmHA Section 523 technical assistance program. For the first 20 years of its existence, RCHC focused on self-help housing development. Since the 1980s, the organization's housing program diversified to include rehabilitation and rental housing development, including the preservation of at-risk housing projects. RCHC merged with Mercy Housing California in 2000.

Asociacion Campesina Lazaro Cardenas (ACLC): ACLC is a non-profit organization founded by a group of farmworkers living in a public housing project in Stockton in 1983. The goal of ACLC is to improve housing and living conditions for low-income families. In its early years, ACLC developed two small self-help housing projects; since that time, it has grown to become one of the leading non-profit housing developers in the San Joaquin Valley. ACLC has built over 100 single-family homes and over 300 multi-family rental units.

Christian Church Homes (CCH): CCH has been providing housing in communities since 1961. The organization was created to meet the housing needs of low-income seniors who were facing fewer housing choices in northern California. CCH manages 38 facilities providing 3,296 units. All but one of CCH's facilities is HUD-subsidized apartments. CCH has never sold or defaulted on any of its owned facilities. Most of the subsidy programs allow low-income residents to pay only 30% of their adjusted gross income for rent.

Community Home Builders and Associates (CHBA): CHBA is a non-profit, public benefit corporation involved in the development, construction and management of affordable housing for individuals and families of low to moderate incomes. The organization was founded in 1990 by the Home Builders Association of Northern California. Through its sponsorship of the San Jose Conservation Corps' YouthBuild program, CHBA has provided employment for at-risk youth in the construction trades while helping to create opportunities for the building industry to partner with local communities in an effort to fulfill affordable housing goals.

Stockton Shelter for the Homeless: Stockton Shelter is a not-for-profit agency that serves the homeless. The shelter can house up to 141 homeless persons, including 111 men and 30 women. Stockton Shelter offers a variety of services, including case management, drop-in services, showers, meals, and other supportive services.

Lodi House: The Lodi House is a 75-unit affordable rental housing complex for seniors in the City. This facility, constructed in 1996 with the assistance of City and County funds, provides rental housing for low- and very low-income seniors.

Eden Housing, Inc.: Eden Housing is a non-profit developer that has completed more than 4,200 housing units and 44,500 square feet of adjoining commercial/retail space at more than 50 locations. Eden serves low-income families, seniors, persons with disabilities, the formerly homeless and first-time home buyers. Eden Housing has substantial experience in applying for

funding through government programs, including low-income housing tax credit, and HUD Section 202 and 811 programs.

Eskaton Properties, Inc.: Eskaton's primary mission is to enhance the quality of life for seniors through health, housing, and social services. Eskaton currently operates ten planned affordable retirement communities in northern California for seniors with limited income, including the Manteca Manor in Manteca. These independent living facilities are located close to a variety of services and offer apartment living with maintenance handled by staff. Rental fees are typically subsidized by the federal government.

Central Valley Low Income Housing Coalition (CVLIHC): CVLIHC provides supportive housing and services primarily for homeless families, although some individuals also participate in its program. CVLIHC operates a scattered site program with participants having the primary responsibility for the units where they live. Supportive services include basic life skills training, parenting and family counseling, transportation assistance, child care, assistance in school enrollment, and job search training. CVLIHC's programs provide housing and supportive services for about 90 families.

Financial Resources

The City of Lodi has access to a variety of existing and potential funding sources available for affordable housing activities. These include local, State, federal and private resources, and are summarized in Table III-3. Described below are the three largest housing funding sources the City can use for housing production, rehabilitation, or preservation: Community Development Block Grants, HOME Investment Partnership Program grants, and the Section 8 Rental Assistance Program.

Community Development Block Grant (CDBG) Funds

The federal CDBG program provides funds for a variety of community development activities. The program is flexible in that the funds can be used for a range of activities. The eligible activities include, but are not limited to: acquisition and/or disposition of real estate or property, public facilities and improvements, relocation, rehabilitation and construction (under certain limitations) of housing, homeownership assistance, and also clearance activities.

HOME Investment Partnership Program Funds (HOME)

Federal HOME funds can be used for activities that promote affordable rental housing and homeownership for lower-income households. Such activities include the following: building acquisition, new construction, reconstruction, moderate or substantial rehabilitation, first-time homebuyer assistance, and tenant-based assistance. A federal priority for the use of HOME funds is the preservation of at-risk housing projects.

Section 8 Rental Assistance

The Section 8 program is a federal program that provides rental assistance to very low-income households in need of affordable housing. The program offers a voucher that pays the difference between the current fair market rent and what a tenant can afford to pay (e.g. 30 percent of their income). The voucher allows a tenant to choose housing that may cost above

the payment standard, but the tenant must pay the extra cost. The program is administered by the Housing Authority of San Joaquin County.

Table III-3: Financial Resources for Affordable Housing

PROGRAM NAME	DESCRIPTION	ELIGIBLE ACTIVITIES
1. FEDERAL PROGRAMS		
Community Development Block Grant (CDBG)	Grants awarded to the City on a formula basis for housing and community development activities.	- Acquisition - Rehabilitation - Home Buyer Assistance - Economic Development - Homeless Assistance - Public Services
Emergency Shelter Grants (ESG)	Grants potentially available to the City through the County to implement a broad range of activities that serve homeless persons. Funding availability is uncertain for the current year.	- Shelter Construction - Shelter Operation - Social Services - Homeless Prevention
HOME	Grant program potentially available to the City on a competitive basis for housing activities. City competes for funds through the State's allocation process.	- Acquisition - Rehabilitation - Home Buyer Assistance - Rental Assistance
Low-income Housing Tax Credits (LIHTC)	Tax credits are available to persons and corporations that invest in low-income rental housing. Proceeds from the sales are typically used to create housing.	- New Construction - Acquisition - Rehabilitation
Mortgage Credit Certificate (MCC) Program	Income tax credits available to first-time homebuyers to buy new or existing single-family housing. County Housing Authority makes certificates available.	- Home Buyer Assistance
Section 8 Rental Assistance Program	Rental assistance payments from the Housing Authority of San Joaquin County to owners of private market rate units on behalf of very low-income tenants.	- Rental Assistance - Home Buyer Assistance
Section 108	Provides loan guarantees to CDBG entitlement jurisdictions for capital improvement projects. Maximum loan amount can be up to five times the jurisdiction's recent annual allocation. Maximum loan term is 20 years.	- Acquisition - Rehabilitation - Home Buyer Assistance - Economic Development - Homeless Assistance - Public Services

PROGRAM NAME	DESCRIPTION	ELIGIBLE ACTIVITIES
Section 202	Grants to non-profit developers of supportive housing for the elderly.	- Acquisition - Rehabilitation - New Construction
Section 203(k)	Provides long-term, low interest loans at fixed rate to finance acquisition and rehabilitation of eligible property.	- Land Acquisition - Rehabilitation - Relocation of Unit - Refinance Existing Indebtedness
Section 811	Grants to non-profit developers of supportive housing for persons with disabilities, including group homes, independent living facilities and intermediate care facilities.	- Acquisition - Rehabilitation - New Construction - Rental Assistance
U.S. Department of Agriculture (USDA) Housing Programs (Sections 514/516)	Below market-rate loans and grants for farmworker rental housing.	- New Construction - Rehabilitation
2. STATE PROGRAMS		
Affordable Housing Partnership Program (AHPP)	Provides lower interest rate CHFA loans to home buyers who receive local secondary financing.	- Home Buyer Assistance
CalHOME	Provides grants to local governments and non-profit agencies for local home buyer assistance and owner-occupied rehabilitation programs and new home development projects. Will finance the acquisition, rehabilitation, and replacement of manufactured homes.	- Home Buyer Assistance - Rehabilitation - New Construction
California Housing Assistance Program	Provides 3% silent second loans in conjunction with 97% CHFA first loans to give eligible buyers 100% financing.	- Home Buyer Assistance
California Housing Finance Agency (CHFA) Rental Housing Programs	Below market rate financing offered to builders and developers of multi-family and elderly rental housing. Tax exempt bonds provide below-market mortgages.	- New Construction - Rehabilitation - Acquisition
California Housing Finance Agency (CHFA) Home Mortgage Purchase Program	CHFA sells tax-exempt bonds to make below-market loans to first-time buyers. Program operates through participating lenders who originate loans for CHFA.	- Home Buyer Assistance
California Self-Help Housing Program (CSHHP)	Provides grants for the administration of mutual self-help	- Home Buyer Assistance - New Construction

PROGRAM NAME	DESCRIPTION	ELIGIBLE ACTIVITIES
	housing projects.	
Emergency Housing and Assistance Program (EHAP)	Provides grants to support emergency housing.	- Shelters & Transitional Housing
Emergency Shelter Program	Grants awarded to non-profit organizations for shelter support services.	- Support Services
Extra Credit Teacher Program	Provides $7,500 silent second loans with forgivable interest in conjunction with lower interest rate CHFA first loans to assist eligible teachers to buy homes.	- Home Buyer Assistance
Farmworker Housing Assistance Program	Provides State tax credits for farmworker housing projects.	- New Construction - Rehabilitation
Housing Enabled by Local Partnerships (HELP)	Provides 3% interest rate loans, with repayment terms up to 10 years, to local government entities for locally-determined affordable housing priorities.	- New Construction - Rehabilitation - Acquisition - Home Buyer Assistance - Site Acquisition - Site Development
Joe Serna Jr. Farm-worker Housing Grant Program (FWHG)	Provides recoverable grants for the acquisition, development and financing of ownership and rental housing for farmworkers.	- Home Buyer Assistance - Rehabilitation - New Construction
Multi-Family Housing Program (MHP)	Deferred payment loans for the new construction, rehabilitation and preservation of rental housing.	- New Construction - Rehabilitation - Preservation
Self-help Builder Assistance Program (SHBAP)	Provides lower interest rate CHFA loans to owner-builders who participate in self-help housing projects. Also provides site acquisition, development and construction financing for self-help housing projects.	- Home Buyer Assistance - New Construction - Site Acquisition - Site Development
Supportive Housing/ Minors Leaving Foster Care	Funding for housing and services for mentally ill, disabled and persons needing support services to live independently.	- Supportive Housing - Foster Care
3. LOCAL PROGRAMS		
Financial Incentives under the Density Bonus Ordinance	The County's Density Bonus Ordinance offers financial incentives, as required by State law.	- New Construction
Tax Exempt Housing Revenue Bond	The County can support low-income housing by issuing housing mortgage revenue bonds requiring the developer to lease a fixed percentage of the units to low-income families at	- New Construction - Acquisition - Rehabilitation

PROGRAM NAME	DESCRIPTION	ELIGIBLE ACTIVITIES
	specified rental rates.	
4. PRIVATE RESOURCES		
California Community Reinvestment Corporation (CCRC)	Non-profit mortgage banking consortium designed to provide long term debt financing for affordable multi-family rental housing. Non-profit and for profit developers contact member banks.	- New Construction - Rehabilitation - Acquisition
Federal National Mortgage Association (Fannie Mae)	- Fixed rate mortgages issued by private mortgage insurers.	- Home Buyer Assistance
	- Mortgages which fund the purchase and rehabilitation of a home. -	- Home Buyer Assistance - Rehabilitation
	- Low Down-Payment Mortgages for Single-Family Homes in underserved low-income and minority cities.	- Home Buyer Assistance
Freddie Mac Home Works	Provides first and second mortgages that include rehabilitation loan. County provides gap financing for rehabilitation component. Households earning up to 80% MFI qualify.	- Home Buyer Assistance
Savings Association Mortgage Company Inc.	Pooling process to fund loans for affordable ownership and rental housing projects. Non-profit and for profit developers contact member institutions.	- New construction of rentals, cooperatives, self help housing, homeless shelters, and group homes

Source: Compiled by Cotton/Bridges/Associates, April 2003.

B. Constraints

1. Non-Governmental Constraints

a. Availability of Financing

The availability of financing affects a person's ability to purchase or improve a home. Under the Home Mortgage Disclosure Act (HMDA), lending institutions are required to disclose information on the disposition of loan applications by the income, gender, and race/ethnicity of the applicants. This applies to all loan applications for home purchases and improvements, whether financed at market rate or with government assistance.

Tables III-4 and III-5 summarize the disposition of loan applications submitted to financial institutions for home purchase and home improvement loans within the City of Lodi. Included is

the percentage of loans that are "approved" and "denied" by applicants of different income levels. The status of "other" loans indicates loan applications that were neither approved nor denied, but were not accepted by the applicant, or those applications that were withdrawn by the applicant.

Home Purchase Loans

In 2001, 1,466 households applied for conventional loans to purchase homes in Lodi. About 55% of the loan applicants (803) were above moderate-income (120% or more of County median family income or MFI) households. Moderate-income (81 to 120% of MFI) and lower-income (80% or less of MFI) households accounted for 24% and 17% of loan applicants, respectively. The overall loan approval rate was 83%. As expected, the approval rates for home purchase loans increased with household income. The approval rate was 74% for lower-income households, 80% for moderate-income households, and 86% for above moderate-income households.
Table III-4

During the same period, 436 applications were submitted for the purchase of homes in Lodi through government-backed loans (e.g. FHA, VA). To be eligible for such loans, residents must meet the established income standards. The overall loan approval rate was 86%. Of the three income groups, moderate-income households had the highest approval rate at 87%, followed by above moderate-income households (85%) and lower-income households (84%).

Table III-4: Disposition of Home Purchase Loans

Applicant Income	Conventional Loans				Government-Backed Loans			
	Total	Approv	Denied	Other	Total	Approv	Denied	Other
Lower	249	74%	18%	8%	119	84%	9%	7%
Moderate	355	80%	11%	9%	150	87%	7%	5%
Above Moderate	803	86%	8%	6%	161	85%	7%	8%
N.A.*	59	80%	12%	9%	6	83%	0%	17%
Total	**1,466**	**83%**	**10%**	**7%**	**436**	**86%**	**8%**	**7%**

Source: Home Mortgage Disclosure Act (HMDA) data, 2001.
* N.A. Loan applicants who chose not to disclose their income.

Home Improvement Loans

During 2001, 210 Lodi households applied for conventional home improvement loans. The overall approval rate was 54%, significantly lower than the rate for conventional home purchase loans (83%). Above moderate-income households accounted for the largest share of loan applicants (56%), followed by lower-income (20%) and moderate-income households (18%). Among the three income groups, above moderate-income households had the highest approval rate at 67%, while moderate-income households had the lowest rate at 42%. There were only two applications for government-backed home improvement loans in 2001.

Table III-5: Disposition of Home Improvement Loans

Applicant Income	Conventional Loans			
	Total	Approve	Denied	Other
Lower	41	44%	49%	7%
Moderate	38	42%	53%	5%
Above Moderate	118	67%	24%	9%
N.A.*	13	0%	69%	31%
Total	**210**	**54%**	**37%**	**10%**

Source: Home Mortgage Disclosure Act (HMDA) data, 2001.
* N.A. Loan applicants who chose not to disclose their income.

To address potential private market lending constraints and expand homeownership and home improvement opportunities, the City of Lodi offers and/or participates in a variety of home buyer and rehabilitation assistance programs. These programs assist lower- and moderate-income residents by increasing access to favorable loan terms to purchase or improve their homes. .

b. Cost of Land

A key factor in determining housing cost is the price of raw land and any necessary improvements. A review of property listings by several real estate firms in Lodi that specialize in land sales indicate that the cost of land zoned for residential use, or that may be suitable for residential use with the property zoning and permits, ranges from as little as $18,000 per acre for agricultural land located just outside the City limits (no infrastructure improvements) to as much as $170,000 per acre for development-ready single family lots. Undivided acreage within Lodi's Sphere of Influence, but without full improvements or permits can range from $15,600 to $100,000 per acre, depending on current zoning and location. Single-family land within Lodi with varying degrees of improvements, including utilities, public services, streets, and/or entitlements is approximately $25,000 to $40,000 per single-family lot.

Between these high and low ranges are sites zoned for residential or commercial use (three of the City's commercial zones and one mixed-use zone permit residential uses). Land zoned for commercial use that permits multifamily residences with access to various levels of infrastructure can range from $35,000 to $120,000 per acre. The cost of such commercial land equals $1,200 to $4,000 per dwelling unit at the maximum permitted multifamily residential density (30 units per acre before density bonuses under the City's General Plan) and $1,700 to $6,000 per dwelling unit at the lower density of 20 units per acre included in the General Plan

c. Construction Cost

Single-Family Homes

Various factors can affect the cost of building a single-family house, including the type of construction, custom versus tract development, materials, site conditions, finishing details, amenities, square footage, and structural configuration. These factors create a wide variation in

construction costs, from as little as $75 per square foot for basic construction to as much as $125 for high-quality custom construction. A basic, 1,200-square foot starter home could be constructed in Lodi for $100,000. Including land cost of about $25,000 per lot, permit and development impact fees of $6,000, site preparation, and other miscellaneous costs, the minimum cost of producing a 1,200-square foot home in Lodi is estimated to be between $140,000 and $150,000, excluding developer fee or profit.

Multi-Family Housing

Contacts with multi-family housing developers in the Lodi region indicate that construction costs for multi-family housing units, excluding land and site preparation costs, fees, and related expenses range from $70 to $100 per square foot, depending on the quality of construction and interior amenities. As noted in the Analysis of Assisted Housing Projects at-Risk, the average cost of replacing a rental housing unit, including all costs related to construction, land development, fees, and builder profit, is estimated to be $100,000.

2. Governmental Constraints

Local policies and regulations impact the price and availability of housing and subsequently the provision of affordable housing. Land use controls, site improvement requirements, fees and exactions, permit processing procedures, and other factors can constrain the maintenance, development, and improvement of housing. This section discusses potential governmental constraints, as well as policies that encourage housing development in the City.

State and federal regulations also affect the availability of land for housing and the cost of producing housing. Regulations related to environmental protection, prevailing wages for publicly-assisted construction projects, construction defect liability, and building codes can work to increase housing cost and limit housing development.

While the City recognizes that constraints exist at other levels of government, the City has little or no control over these regulations and no ability to mitigate them directly. Therefore, this section of the Housing Element focuses on policies and regulations under the City's control.

a. Land Use Regulations

General Plan Land Use Designations

The Land Use Element of the General Plan sets forth the City's development policies. These policies, as implemented by the Zoning Ordinance (Title 17 of the Lodi Municipal Code), establish the amount of land allocated for residential and other uses within the City. The Land Use Element establishes seven land use designations that allow residential uses: Low Density Residential, Medium Density Residential, High Density Residential, Eastside Residential, Planned Residential, Neighborhood Community Commercial, and Downtown Commercial. Each designation corresponds with one or more zoning districts as shown in Table III-6.

Planned Residential

The Planned Residential category is a General Plan designation that applies to properties to be annexed to the City but not yet zoned for specific residential uses. According to General Plan policies, the PR category is assumed to have an average density of seven dwelling units per acre based on development at the mid-point density of the LDR, MDR, and HDR land use categories and assuming that 65 percent of the land in the PR category is developed at LDR density, 10 percent at MDR density, and 25 percent at HDR density. These are conservative assumptions that do no preclude specific sites within a PR-designated area from being developed at the maximum density permitted by the General Plan.

Planned Residential Reserve

Lodi's General Plan includes a land use designation of Planned Residential Reserve (PRR). Land uses allowed within this area include agricultural, single family residential, commercial, industrial, and public/quasi-public. The PRR land use designation incorporates land between Harney Lane and Armstrong Road, west of State Route 99. However, this area is not projected for residential development before 2007. In the interim, these areas are used for agricultural purposes.

Table III-6: Land Use Categories Allowing Residential Use

General Plan	Zoning District(s)	Maximum Density (du/ac)	Minimum Lot Size (Sq. ft.)	Typical Residential Type(s)
Low Density Residential (LDR)	R-1 R-2	7 7	6,500 5,000	Single Family Homes
Medium Density Residential (MDR)	R-GA R-LD R-MD	20	6,000	Single Family Homes, Two-Family Homes, Multi-Family Housing
High Density Residential (HDR)	R-GA, R-LD, R-MD, R-HD	30	4,000	Multi-Family Housing
Eastside Residential (ER)	R-1	7	4,000	Single Family Homes
Planned Residential (PR)	R-1, R-2, R-GA, R-LD, R-MD, R-HD	7 (average density based on 65% LDR, 10% MDR, and 25% HDR)	4,000	Single Family Homes, Two-Family Homes, Multi-Family Housing
Neighborhood/Community Commercial (NCC)	C-1	20	4,000	Multi-Family Housing
Downtown Commercial (DC)	C-2	30	4,000	Multi-Family Housing
Office (O)	C-2	20	4,000	Multi-Family Housing

Residential Allocation System

The City's General Plan establishes a growth management program implemented by the City through Ordinance 1521, which regulates residential growth to two percent per year through 2007 and designates residential land sufficient to meet the City's needs. Given that Lodi will continue to grow after 2007, the General Plan also establishes "reserve" land; land designated for development of specific land use types, which is recognized for development in the future. The reserve designations include Planned Residential Reserve (PRR), discussed above, and Industrial Reserve (IR).

To ensure a two percent growth rate per year, Lodi established a residential permit allocation system. The residential allocation system establishes the number of units that can be permitted on a yearly basis within the established two percent limit of Ordinance 1521. The system is applied to all residential projects of five dwellings or more, except senior housing developments. Housing units constructed on individual lots that existed prior to the adoption of Ordinance 1521 or in new subdivisions or multifamily projects of one to four housing units are exempt from the annual allocation limit. The City establishes separate allocation limits for single-family and multifamily units. Unused allocations may roll over into subsequent years without limit.

Proposed developments receiving the highest number of points under an annual permit application process receive allocations. The City awards points based on issues such as agricultural land conflicts, onsite agricultural land mitigation, relationship to public services, promotion of open space, traffic, and circulation levels of service, required traffic improvements, housing, and site plan and project design. Projects are ranked by point-score and eliminated as necessary in order to equal the number of permits allowed for a given year. No single-family development is allowed to receive more than one third of the permits available in any single year unless the number of applications is less than the total permits available for the year.

Although the City's residential permit allocation process establishes an annual upper limit on the annual allocations, the City's rate of housing construction over the past decade has been less than permitted under the allocation system. Unused allocations are allowed to roll over into subsequent years. As of June 2003, the City calculates that there are 1,143 unused low density (single-family) housing unit allocations, 381 medium density (high density single-family or low density multifamily) housing unit allocations, and 1,441 unused high density (multifamily) housing unit allocations. Based on the two percent annual limit in housing unit allocations, the City projects that, between June 2003 and June 2009, applicants can request approximately 2,750 additional housing unit allocations. Combined with existing unused allocations, this allows for a total of 5,715 dwelling units. The City could allocate 2,128 of this allocation to high density housing units. The City's residential permit allocation process is not anticipated to create an impediment to accommodating the City's share of regional housing needs, 4,014 housing units, under the SJCOG housing allocation plan, including 1,654.housing units affordable to very low- and low-income housing.

The allocation process adds time and cost up front to the development process because allocations are awarded once per year, and a substantial investment is required on the applicant's part to provide the level of site plan and application detail required by the City to receive an allocation. The time and cost are recouped for successful applicants who receive allocations because their proposed site plans and other details of the development proposal are reviewed and approved by the City during the allocation process. Once a development

proposal is approved, an applicant may proceed with a Tentative Subdivision Map (TSM). Approval of the TSM is the final major regulatory process for the applicant. Following approval of the TSM and allocation of housing units, the applicant generally need only apply for ministerial approvals (final subdivision map, building permits, etc.). Applicants can apply for multi-year allocations (up to three years), which would further reduce the long-term cost of receiving development approvals under the allocation process. However, use of housing allocations must be done in accordance with the schedule approved and construction occur in the year for which the allocation applies.

The net time and cost effect of the City's permit allocation system is probably neutral for successful applicants. It does not appear that the total time and cost required to obtain planning and building permits, from initial application to construction, is significantly greater in Lodi than in other communities as long as the developer is aware of the City's allocation process and plans accordingly.

Residential Zoning Standards

The existing Zoning Code regulates the type, location, density, and scale of residential development. Zoning regulations exist to protect and promote the health, safety, and general welfare of residents. In addition, the Zoning Code serves to preserve the character and integrity of existing neighborhoods. As seen in Table III-7, Lodi's Zoning Ordinance includes design standards and guidelines for the following residential zoning districts:

- Residence District – One Family – R-1
- Residence District – One Family – R-2
- Low-Density Multifamily Residential District – R-LD
- Garden Apartment Residence District – R-GA
- Medium-Density Multifamily Residence District – R-MD
- High-Density Multifamily Residence District – R-HD

Residential land uses are also allowed within the following zoning districts:

- Residential-Commercial-Professional Office District – R-C-P
- Planned Development District – P-D
- Neighborhood Commercial District – C-1
- General Commercial District – C-2

The City is currently processing a revision of the Development Code, which has the potential to change the following provisions.

Residential Density

The City permits residential densities of varying ranges. In the R-1 zone, the City allows a density of seven dwelling units per acre. Allowable densities within the remaining residential and commercial zones are 20 dwelling units per acre in the R-2 and R-MD zones to 30 dwelling units per acre in the remaining residential zones. Commercial and mixed-use zones that permit residences also allow 30 dwelling units per acre.

Yards and Setbacks

Yard and setback requirements are consistent with permitted densities in residential zones: 20 feet in front, ten feet in back, and five feet on each side. There is no side yard setback requirement in multifamily zones, except on corner lots (which are required to have a side yard setback of 10 feet). Yard and setback requirements within the other zoning districts are typical in comparison with most jurisdictions.

Building Coverage

The City's building coverage standards are reasonably related to the density provisions in each residential zone. In multifamily zones, permitted building coverage ranges from 40/50 percent in the R-LD zone (low density multifamily) to 60 percent in the R-HD zone. Building coverage pertains to primary (main) building only, not accessory structures such as enclosed parking, unless the structures are part of the primary building. Therefore, building coverage requirements do not impose a constraint to achieving maximum residential densities.

Lot Size and Lot Area per Dwelling Unit

In zones designated for single-family homes, minimum lot size is 6,500 square feet in the R-1 zone and 5,000 square feet in the R-2 zone. Where lower density multi-family development is allowed, minimum lot size is 6,000 square feet. Zones allowing high density multi-family development have a minimum lot size of 4,000 square feet. Lodi does not regulate lot area per dwelling unit in multifamily zones.

Building Height

Permitted building heights range from 35 feet in single-family and low- and medium-density multifamily zones to 60 feet (four stories) in the high-density multifamily zone. Residential uses are allowed in the C-2 zone, which has a maximum building height of 75 feet (six stories) in the City's central business area. Lodi's Zoning Ordinance includes a provision for exceptions to standard height limitations for non-habitable architectural elements and structures. Permitted heights are sufficient to achieve the residential densities allowed in each zone.

Table III-7: Residential Development Standards

Zoning Standards	Zoning Districts										
	R-1	R-2	R-LD	R-GA	R-MD	R-HD	R-C-P	P-D	C-1	C-2	UH
Max Density (du/ac) per GP	7	7	7	20	20	30	10	[1]	30	30	1/20
Min Lot Size (sq ft)	6,500	5,000	5,000	4,000	4,000	4,000	5,000	[1]	4,000	4,000	20 ac
Min Lot Width (ft)	60	50	50	50	40	40	50	[1]	40	40	--
Front Yard (ft)	20	20	20	20	20	20	20	[1]	20	None	--
Side Yard (ft)	5	10% lot width, min. 5	5	None, 10 on corner	None, 10 on corner	None, 10 on corner	None, 10 on corner	[1]	5	None	--
Rear Yard (ft)	10	10	10	10	10	10	10	[1]	10	10	--
Building Coverage (%)	45	45	40 - 50	50	50	60	50	[1]	50	60	--
Max Building Height (ft)	35	35	35	35	35	60	35	35	35	75[3]	35
Parking (spaces/unit)	2 Covered	2 Covered	2, 2/3 Covered	2, 2/3 Covered	2 Uncovered	2 Uncovered	[2]	[1, 2]	[2]	[2]	[2]
Housing Types Permitted											
Single Family	P	P	P	P	P	P	P	P	P	P	P
Two Family	X	P	P	P	P	P	P	P	P	P	X
Three/Four Family	X	X	P	P	P	P	P	P	P	P	X
Multiple Family/Apts	X	X	X	P	P	P	P	P	P	P	X
Condominiums	X	X	X	P	P	P	P	P	P	P	X
Second Units	U	U	U	U	U	U	P	P	P	P	X
Family Care Homes	P[4]	X	P[4]	U	U	U	P	P	X	X	X
Rest Homes	X	X	X	U	U	X	P	P	X	X	X
Convalescent Homes	X	X	X	U	U	X	P	P	X	X	X
Hotel/Motel	X	X	X	X	X	P	X	P	P	P	X
Lodging/Boarding Houses	X	X	X	X	X	P	X	P	P	P	X
Mobile Homes/Trailer Park	X	X	X	X	U	U	X	X	X	U	X

Source: Chapter 17, Lodi Municipal Code

1. P-D Zone allows for all land uses when shown on planned development and subject to requirements of a use permit.
2. Parking requirements vary by intensity and type of residential use.
3. Maximum height within the designated central business area only; elsewhere, heights in C-2 are determined by adjacent districts.
4. Permitted uses subject to Planning Department approval.

Occupancy Standards

Lodi does not regulate occupancy of residential units or distinguish between related and unrelated individuals. However, Chapter 17.03.250 of the City's zoning ordinance defines "family" as, "one or more persons occupying a premise and living as a single housekeeping unit...includes necessary servants." This definition of family would not result in a constraint upon any type of residential use as it does not limit the amount of people allowed to live within a dwelling unit.

Family Care Homes, Rest Homes, Convalescent Homes

Under state law, the City of Lodi is required to consider licensed residential care facilities, which provide housing and care for persons with disabilities, chronic illnesses, and other conditions that require supervised group living, as a residential use. Facilities that serve six or fewer persons must be permitted by right in residential districts. The City only has one licensed facility that is an adult day care with room to serve 30 clients.

The Lodi Zoning Ordinance does not specify residential care facilities, as a general category of land use, a permitted use in residential zones. The City does specify certain types of facilities, such as family care homes that provide day care for children, 24-hour foster care homes, and convalescent and rest homes as permitted uses. The lack of specificity in the Zoning Ordinance could create an impediment to the location of community care facilities as the decision to allow such uses (except those specifically cited above) is made on a case-by-case basis without a clear set of criteria. The Zoning Ordinance should be amended to clarify that all types of residential care facilities of six of fewer individuals are permitted by right in residential zones. The Ordinance could also identify the zoning districts and permit process under which facilities of seven or more persons are permitted.

Convalescent homes are defined as, "a facility providing bed care or convalescent care for one or more persons, exclusive of relatives who require professional nursing care including close medical supervision, professional observation or the exercise of professional judgment, but not serving or admitting persons with mental or communicable diseases." Rest homes and convalescent homes are permitted within the R-C-P and P-D zones and also within the R-GA and R-MD zoning districts, subject to acquisition of a use permit.

Family care homes are identified as providing care for children in particular numbers in Lodi's Municipal Code. Family care homes for up to six children, ages zero to six, are permitted by right within the R-1, R-2, R-LD, R-C-P, and P-D zoning districts. This is also an allowable use within the R-GA, R-MD, and R-HD zoning districts subject to a use permit.

Neither the General Plan nor the Zoning Ordinance regulates the location of the various family care, rest homes, or convalescent home facilities based on proximity to other such facilities.

Cumulative Zoning

The Lodi General Plan and Zoning Ordinance are cumulative in that lower density residential uses are permitted in higher density land use/zoning districts. The relationship between the residential land use categories in the General Plan and the City's Zoning Ordinance creates a

potential constraint to multifamily developments. The allowance for lower density residential uses on smaller, infill parcels that can only accommodate a few dwelling units is reasonable. However, lower density, single family residential is a permitted land use within all zoning districts, which means that developers with R-HD zoned property are not required to develop it with high-density residential uses. This constraint could be alleviated by requiring that single family residential developments within R-MD and R-HD zones obtain a use permit from the City that will only be issued when the property owner can demonstrate that the development of multiple residential land uses are not feasible due to physical conditions of the property.

Parking Standards

Parking Ratios

Parking ratios for residential uses in Lodi are determined by dwelling unit type, regardless of occupancy. For all residential uses including mobile homes, two spaces per unit is the standard parking requirement. Lodging and retirement homes are required to provide one parking space per two sleeping rooms. Convalescent homes and rest homes are subject to different standards that require one parking space per three beds. Hotel and motel uses must have one space per room and one space for the facility's manager.

The City's parking ratios are reasonable in relation to the likely demand for parking from different residential uses for housing units with two or more bedrooms. The requirement of two spaces per unit for multiple family uses may be a constraining factor on development of small, infill lots typical of most vacant parcels in Lodi. The required parking may be also excessive for efficiency/studio and one-bedroom units. The City mitigates this constraint by providing an administrative process for approving minor deviations from zoning standards; including parking requirements (see the section below on Development Review Process).

Parking Improvement Standards

Lodi requires parking to be covered for various residential uses. Single family homes and duplexes are required to have two covered spaces per unit. Three/Four family homes and multiple family housing are required to have two spaces per unit, two-thirds of which must be covered. However, parking within the R-MD and R-HD districts and mobilehome parks are not required to be covered. The allowance for partly uncovered parking in low-density multifamily zones and uncovered parking in medium- and high-density multifamily zones permits sufficient flexibility to keep housing construction costs to a reasonable level.

Location of Parking

Parking must be provided within the same lot as the residential unit, outside of the required setback areas. However, the two parking spaces required for residential uses can be provided within the front yard or street side yard, within a permanent driveway or parking pad, created by a minimum of two inch thick concrete, asphalt, or other suitable material and covering no more than 45 percent of the yard area. The allowance for a portion of the parking to locate within a required yard area provides sufficient options to meet parking requirements while providing sufficient lot area to achieve permitted residential densities.

Parking Reductions

Lodi's Zoning Ordinance does not provide specific exceptions for reduced parking or allow reduced parking for housing in commercial areas. A parking reduction would either require a variance from parking requirements due to unique property characteristics, or be approved as an incentive under the City's density bonus provisions for affordable housing. To mitigate the potential constraint of required parking for smaller housing units with one or fewer bedrooms and special needs affordable housing, the City could revise required parking ratios to tie the number of spaces to the number of bedrooms.

Allowances for Housing Alternatives

Secondary Units

The City defines a secondary unit as, "an additional living unit on a lot within a single-family zone. A second unit is a self-contained unit with separate kitchen, living and sleeping facilities. A second unit can be created by (A) altering a single-family dwelling to establish a separate unit or (B) adding a separate unit onto an existing dwelling." Second units are allowed, subject to the requirements of a use permit, within the R-1, R-2, and R-LD zoning districts. These units are automatically permitted in the R-GA, R-MD, and R-HD zoning districts. The requirement for a use permit in some residential zones does not meet current state requirements and will need to be revised.

The City requires that the second unit be architecturally compatible with the existing single family dwelling. It must have a separate exterior entrance and be no larger than four thousand square feet in floor area. The unit must also have one off-street parking space above the parking required for the existing residence. The definition of second units in the zoning code states that the unit must be attached to the existing single family house. Despite this definition, the City allows second units detached from the primary residence as a matter of practice. As part of this Update, the City will revise the zoning ordinance definition to reflect its current practice of allowing detached second units, consistent with State law requirements.

Mobile Home and Travel Trailer Parks

Mobile homes and travel trailers offer an affordable housing option to many low- and moderate-income households. However, Lodi's Zoning Ordinance limits the occupation of mobile homes and/or travel trailers to designated mobile home parks within the R-MD, R-HD, and C-2 zoning districts, subject to compliance with the requirements of a conditional use permit. The limitation of the location of mobile home parks does not comply with state law, which requires that the City allow mobile home parks in all residential zones. In addition, it is not clear in the Zoning Ordinance that the City allows mobilehomes on permanent foundations in single-family zoning districts under the same standards as site-built housing, as required by state law. The Zoning Ordinance will be revised to reflect the current practice of allowing mobilehomes in single-family zones.

Mobile home parks are required to be at least five acres in area and have clearly designated lots no smaller than 2,500 square feet for each mobile home and 1,000 square feet for each travel trailer. Allowable densities are ten mobile homes per gross acre and 15 travel trailers per

gross acre (including internal streets and common areas). In addition, only ten percent of the lots can be for travel trailers. The park is required to have landscaping in all common areas. The minimum parcel size of five acres has been established to ensure that mobilehome parks provide common areas and facilities for park residents, which would not be feasible in a small mobile home park.
Both mobile home lots and travel trailer lots are required to have front and rear setbacks of five feet and side setbacks of 3 feet. The Zoning Ordinance also requires that each lot has a hard-surfaced patio of not less than 200 square feet. Two parking spaces per lot are also required. The City requires that site plans and specifications for mobile home parks be approved by the California Department of Housing and Community Development, Division of Building and Housing Standards.

With the exception of limits on the location of mobilehomes and mobile home parks, the City's development standards should not impose unreasonable constraints that would make this alternative housing type infeasible to develop. There are eight existing mobile home parks in Lodi. However, the City has not received applications for mobile home parks in over ten years, primarily due to the lack of large sites in permitted zones and land market costs for land.

Other Housing Types

Lodi's Zoning Ordinance does not include definitions for farmworker housing, transitional housing, or emergency shelters or list them as permitted uses within any residential zoning district, which could pose a constraint to the provision of these housing and shelter alternatives. The City could alleviate this potential constraint by defining these housing types and including them within the lists of permitted uses in appropriate zones and establishing appropriate permit procedures. However, the lack of specific definitions in the Zoning Ordinance for these types of special needs housing has not prevented housing providers from locating homeless shelters, supportive services, group homes, and farmworker housing in Lodi, as described in Section II-D, Special Needs Housing of this document.

Renting of Rooms

The City permits the renting of rooms within any residential zoning district as an accessory use. The renting of rooms and the provision of board is permissible but limited to five sleeping rooms, as defined in the Zoning Ordinance. Boarding houses, which are used primarily for the provision of room and board for up to five individuals, are allowed by right in the R-HD, P-D, C-1, and C-2 zoning districts. The Zoning Ordinance also defines "guesthouse," which is similar to a secondary unit without kitchen facilities, as a permissible use within residential zoning districts. However, rental of these units is expressly prohibited.

Allowances for Persons with Disabilities

Lodi's Zoning Code permits certain detached and attached accessory uses and various projections into yards and setbacks. While the Code does not specifically indicate that facilities for access by persons with disabilities are permitted, accessory uses such as ramps or lifts for handicapped accessibility are similar to the permitted uses that are specified. Given the Community Development Director's and Building Official's discretion to interpret zoning and building code standards, accessory structures that afford access to persons with disabilities are

generally allowed. Such requests are approved administratively unless the nature of the request triggers a major design review, which is unlikely.

Lodi's parking standards require that parking lots comply with State access regulations, which require handicapped spaces.

As described above, the Zoning Code includes provisions for special needs housing. Housing types recognized by the code that by nature, are accessible by persons with disabilities include convalescent homes and rest homes, some of which also have age restrictions. The only other housing resource accessible to this special needs group would be conventional housing units that may not contain accessibility features to meet the specific needs of persons with disabilities.

There are no specific policies, programs, or provisions within the Zoning Ordinance that specifically obstruct the development of housing or other structures that accommodate persons with disabilities. However, there are no special provisions either, which may be a constraining factor upon improvements and developments focused to meet the special needs of persons with disabilities. Creation and implementation of a program designed to increase the allowances for persons with disabilities would remove this potential constraint.

Flexibility in Development Standards

The Zoning Ordinance contains a Planned Development (P-D) District, generally allowable on ten acres or more. Planned developments are allowable on parcels of two to ten acres if the proposed development consists entirely of residential uses, does not exceed a density of 12.5 dwelling units per acre, and is located on a site that has unique characteristics which make it difficult to develop.

Any land use is permitted in the P-D district subject to the approval of a use permit. Densities, setback and yard requirements, and height requirements are established within each planned development area and approved by the City Council. This zoning district provides developers with an opportunity to create projects that vary from the strict application of the Zoning Ordinance and better meet the development needs of the City.

Nonconforming Uses

Lodi's Zoning Ordinance includes allowances for repairs or alterations to nonconforming buildings. However, the City prohibits structural alterations unless they are mandated by other laws or ordinances. The City also prohibits nonconforming uses from being enlarged in any manner. Nonconforming buildings are prohibited from being moved within a lot, to another lot, or to another zoning district unless the building is altered to conform to the zoning regulations. The City allows repair of nonconforming uses damaged by natural disasters, however, repairs are not allowed to exceed 50 percent of the nonconforming uses reasonable value.

Exceptions and Variances

The City's Planning Commission is afforded the opportunity to vary or modify development requirements, such as front yard setbacks, at any time as long as the variations are uniformly applied along a given development block. The discretion given to the Planning Commission

increases opportunities to develop small infill parcels that may not comply with front yard requirements.

The City approves exceptions, known as variances, to its zoning standards because the strict application of such standards would render many infill and re-use projects infeasible. For example, the City recently approved a variance for reconstruction of a housing unit for the San Joaquin Housing Authority that encroaches within an existing right-of-way.

Other Zoning Issues

The City allows several non-residential land uses, subject to approval of a use permit, within all of the residential zoning districts. Such land uses include churches, schools, parks, golf courses, which are typically allowed within residential zones. Lodi also allows land uses such as parking lots, hotels, and motels in the R-HD zoning district, which typically are not allowed in residential zoning districts. By allowing hotels and motels in a multiple family zone, the City may constrain its to meet its low- and moderate-income housing needs by allowing a limited supply of residential land to be developed for non-residential uses. This constraint could be eliminated by reducing the types of nonresidential uses allowed within residential zones.

b. On- and Off-site Improvement Standards

Site improvements are an important component of new development and include roads, water and sewer, and other infrastructure necessary to serve the new development. Improvement requirements are regulated by the City's subdivision ordinance. Within the existing City limits, off-site improvement requirements are typically limited because the infrastructure needed to serve infill development is already in place. Where off-site improvements are required, they typically relate to local improvements to existing facilities to accommodate higher density development or to repair or replace aged infrastructure.

Street Improvements

Street improvement standards can have a significant impact on housing cost. The cost of providing streets for new residential developments, in turn, is primarily influenced by the required right-of-way width, pavement width, and pavement improvement standards. Table III-8 summarizes Lodi's right-of-way and pavement requirements for the hierarchy of streets. The right-of-way and pavement requirements allow for slightly narrower streets in residential areas than in many communities. Minimum pavement widths of 50 feet or more for collector streets and 40 feet of more for residential streets are common among local jurisdictions. Lodi's Zoning Ordinance includes a provision for reimbursement to developers for excess widths of street construction, more than 68 feet for construction of new streets and widening in excess of 34 feet on one side.

Required street improvements include curbs, gutters, and sidewalks of at least 5½ feet in width. The minimum sidewalk improvement standard is consistent with accessibility requirements for persons with disabilities and is not excessive in light of the need for ensuring the minimum pedestrian access in residential areas. Planting strips equaling two percent of the five and a half foot swath are also required.

Table III-8: Street Standards

Street Type	Required Right-of-Way	Required Pavement Width
Minor Residential	50 feet	30, 34 feet
Standard Residential	55 feet	35, 39 feet
Minor Collector	60 feet	44 feet
Major Collector	68 feet	52 feet
Local	66 feet	52 feet
Secondary Arterial	80 feet	64 feet
Minor Arterial	94 feet	76 feet
Major Arterial	118 feet	102 feet

Source: City of Lodi, Public Works, 2003

Drainage Requirements

Lodi requires that developers of residential subdivisions prepare master storm drainage plans for the area associated with the tentative map. Storm drain must conform to the City's master storm drainage plan. Any facilities within the subdivision that are not part of the City's master plan are the developer's responsibility. However, the City Council has the ability to grant credits to developers for storm drain lines and manholes that they constructed. Payment of mitigation for drainage impacts is included within the City's development impact fee.

Sanitary Sewers

Internal sanitary sewers and appropriate off-site sanitary sewers are required for all proposed development. Installation is required to comply with the current City policies and standards. In the event that developments are asked to construct oversized facilities, Lodi has established a mechanism by which the developer is reimbursed for excess improvements. As part of the development impact fee paid by development, funding, in part, for construction, operation, and maintenance of city-wide sanitary sewer facilities is provided.

Water System

Internal water transmission pipelines and appropriate offsite connection facilities are required for all proposed development. Installation is required to comply with the current City policies and standards. In the event that developments are asked to construct oversized facilities, Lodi has established a mechanism by which the developer is reimbursed for excess improvements. The City also levies a development impact fee that is used, in part, to construct, operate, and maintain city-wide water system facilities.

c. Development Impact Fees

Since the late 1970s, when property taxes in California were reduced by nearly 2/3 through voter initiative, property taxes have not been sufficient to fund the expansion of municipal facilities and services. The significantly lower property taxes that cities receive also means that

municipalities cannot readily issue general obligation bonds at low rates of interest, as once was common, to finance infrastructure expansion. As a result, cities and counties in California have increasingly charged impact fees, imposed special assessments, or created municipal facilities financing districts to provide necessary infrastructure and services to new residential development. The result is that purchasers of new homes have traded lower annual property tax payments for higher up front fees or special assessment payments to finance municipal facilities and support necessary functions of government.

The City of Lodi levies one combined development impact fee for all the various municipal facilities and services under the City's jurisdiction. Although requiring developments to either construct site improvements and/or pay pro rata shares toward the provision of infrastructure, public services, and school facilities is common practice, it nonetheless results in increases to the cost of housing development and in turn, the final sale price or rent of housing. Despite the initial cost that impact fees impose on new homes, such fees are necessary to protect the public health and safety.

To calculate the fee charged to a residential development, the City has established a formula based on the fee per acre times the number of acres for each type of public facility/service (water, sewer, police, fire, streets, parks, etc.). The fee charged to residential development depends on its "residential acre equivalent," or RAE, factor. The "equivalent" for purposes of calculating the factor is a single-family home in the Low Density General Plan land use category (factor of 1.00). The specific factor or ratio of fee, applied to a specific type of residential development is based on the City's estimate of the amount of facility or service that a particular land use will need in relation to a single-family home in the Low Density land use category. For example, a housing unit in the High Density residential category has a RAE factor that ranges from 1.00 for storm drainage to 4.72 for police services.

The RAE factors are based on an average density assumption for each residential land use category, not the specific density of the proposed development. In multifamily zones, the RAE factors can have the effect of significantly increasing the fee payment of development projects (on a per-unit basis) that have lower densities and fewer units than the average assumed by the City. One method of mitigating this potential cost impact would be for the City to use a factor for establishing fees on multifamily projects based on the actual density of the proposed development, not the average density assumed by the City.

The City collects the development fee to cover the costs of providing necessary services and infrastructure related to new development. The structure of the development impact fee has been identified by City staff as a potential constraint to high-density housing production. As shown in Table III-9, the development impact fee for a typical high-density residential development is $5,700 per unit. In contrast, a medium density residential development on the same property would yield an average development impact fee of $5,415. The fee structure therefore encourages the development of medium-density rather than high-density developments in residential areas. This is a constraint that will be addressed in the program section of the Housing Element.

The City requires pro rata payments for off-site extensions of water, sewer, and storm drain lines. However, the City also offers reimbursement for improvements constructed by a development that are found to be valued in excess of what the related impact fee would have

been for the development.

School fees are collected for all new residential development by the Lodi Unified School District, in addition to City fees. The School District charges school impact fees to cover the costs of providing school facilities and services for new residents. This fee is based on the square footage of each new home constructed within the boundaries of the district.

Table III-9 identifies the typical development impact fees for single family and multiple family residential housing.

Table III-9: Planning and Development Fees

Development Impact Fees	Fees
Single Family Home	
Development Plan Review	$1,650
Development Impact Fee (per unit)	$13,662
School Impact Fee[1]	$3.35 psf/ $3.62 psf
Multiple Family Residential	
Development Plan Review	$1,650
Site Plan and Architectural Review	$875
Development Impact Fee (per unit)	$5,700
School Impact Fee[1]	$3.35 psf/ $3.62 psf

[1] $3.35 if no development agreement exists for development, $3.62 if development agreement exists for development.
Source: City of Lodi, 2003

d. Development Review Process

Minor deviations from the provisions of Lodi's Zoning Ordinance are approved through the processing of an administrative deviation. This process requires the submittal of an application and involves review and approval by Community Development Department staff only and can be submitted for land located within any zoning district. Administrative deviations are issued only because of special circumstances such as topography or size constraints that obstruct development of a site. Lodi's Zoning Ordinance identifies the only modifications for which an administrative deviation can be issued. These modifications include: off-street parking requirements, setback requirements, area and width requirements, height requirements, and landscaping requirements. Modifications are only allowed up to a certain percentage of the standard requirements.

The development review process includes site plan and architectural review for certain development projects by the Site Plan and Architectural Review Committee. The purpose of this review is to ensure compliance with the zoning ordinance and promote orderly development of the city. Projects required to obtain site plan and architectural approval are multi-family

residential building, commercial-professional offices, institutional buildings, non-residential buildings in specific zoning districts, and any use that requires a use permit.

Site Plan and Architectural Review is facilitated by the Site Plan and Architectural Approval Committee, which was established to assist the Planning Commission in reviewing site plans and architectural drawings. Four of the five members are appointed by the Mayor, while the fifth member is the Vice-Chair of the Planning Commission. The decision issued by the Site Plan and Architectural Review Committee is appealable to the City Planning Commission. The City's Planning Commission is the final regulatory authority that issues decisions on most developments within the City.

Project Approval Timeframes

A typical residential subdivision takes approximately four to five months to be approved through the required steps of the development plan review process. If the project is subject to compliance with the California Environmental Quality Act, an additional four to five months may be required to obtain all necessary project approvals.

Development of multifamily housing units is subject to review by the Site Plan and Architecture Approval Committee. It takes approximately eight weeks to complete staff review before the development can be submitted to the committee. Smaller developments in the City such as one single family home or two- to four-unit multifamily structures are only required to obtain building permits, which takes significantly less of time than the site plan and architectural review process.

A constraint unique to Lodi is that development plans may only be submitted during the month of May, the deadline for obtaining a housing units allocation under the City's growth management process. If the deadline is missed, projects have to wait another year before submitting applications and the review process can begin again. The City could mitigate this constraint by providing a process whereby allocations could be approved at least semi-annually or quarterly during years when the number of allocations that can be granted are not exhausted in May.

Table III-10: Development Approval Timeframes

Development Permit/Review Process	Time Frame
Administrative Deviation	2-3 weeks
Use Permit	4 weeks
Tentative Tract Map	4 weeks
Development Plan Review	4-5 months
General Plan Amendment/Rezone	6 weeks
Environmental Review (EIR)	5 months
Appeal to Planning Commission	4 weeks
Appeal to City Council	4 weeks
Source: City of Lodi, 2003	

Use Permits

Chapter 17.72 of Lodi's Zoning Ordinance includes regulations and standards related to the granting of use permits. All developments requiring use permits are subject to the same review process, regardless of use. Residential uses required to obtain use permits in Lodi, depending on the zoning district (see Table X-1), include second units, family care homes, rest homes, convalescent homes, and mobile home/travel trailer parks.

Use permits are approved by the City's Planning Commission. The Commission must find that the proposed use will not be detrimental to the health, morals, comfort, or welfare of the citizens of the immediate, surrounding neighborhood and the City in general. These standards are typical conditional or discretionary use permit standards used by cities and counties throughout California. The Zoning Ordinance also allows the Planning Commission to add any additional regulations or requirements deemed necessary to protect the existing community. This ability as well as the lack of specificity within the zoning ordinance regarding the requirements related to a use permit could result in a constraint to housing development, by creating the potential for inconsistent decisions. This constraint has been mitigated by the City's practice of limiting conditions to compliance with zoning standards and off-site impacts. The City does not seek to regulate the users of property or deny certain classes in individuals the ability to live in Lodi.

Building Codes and Enforcement

The City has adopted the Uniform Building Code (UBC), which establishes standards and requires inspections at various stages of construction to ensure code compliance. The intent of the codes is to provide structurally sound, safe, and energy-efficient housing. Lodi's Building Department is responsible for enforcing both State and City regulations governing maintenance of all buildings and property. The City has not adopted local amendments to the UBC.

To address unique situations that may arise in meeting the needs of persons with disabilities, the Community Development Director and the Building Official are granted considerable discretion in the application and interpretation of zoning and building codes. Requests for reasonable accommodations in code interpretation and enforcement by persons with disabilities can be met through the use of the interpretive discretion delegated to City staff. No reasonable requests have been or would be denied, so long as the health and safety of the occupants or adjacent residents are not jeopardized by the granting of an exception for reasonable accommodations.

e. Environmental, Infrastructure, and Public Service Constraints

Environmental factors, including a lack of necessary infrastructure or public services, can constrain residential development in a community by increasing costs and reducing the amount of land suitable for housing construction. This section summarizes and analyzes the most pertinent constraints to housing in Lodi. Although older infrastructure and public facilities need regular maintenance and upgrading, the cost of the necessary improvements are paid through user fees, development impact fees, and pro rata contributions by developers. As discussed below, the City's water, sewer, and storm drain facilities are adequate to accommodate the existing and the future development of Lodi.

However, to accommodate the City's regional housing allocation under the San Joaquin Council of Governments Regional Housing Allocation Plan for 2001 to 2009, Lodi will be required to annex land along the western and southern City limits. For these areas, environmental issues, as well as the extension of infrastructure and public services, must be addressed. In 2002, the City adopted the Westside Facilities Master Plan, a master plan for a western area identified by this Housing Element for annexation, which identifies a mix of land use and City services necessary to support the proposed land uses for the area.

The following discussion addresses the constraint which environmental and infrastructure issues may pose on housing development for the City of Lodi.

Agriculture

Nearly all of the soils in the Lodi area are classified as prime agricultural soils, some requiring frequent irrigation, by the U.S. Department of Conservation. However, due to urban development within the City limits, there are currently no parcels of land subject to Williamson Act compliance in the city. As identified above, Lodi will annex land to the west of the City in order to accommodate its share of the regional housing allocation. Historically, various parcels within this area have been subject to Williamson Act compliance, a mechanism by which agricultural land is preserved for a specified period of time. However, the land proposed to be annexed to the City on the west that are identified in Lodi's current General Plan do not have active Williamson Act contracts that would impede the development of these properties by 2009.

Protection of Endangered Species

Lodi is included within the San Joaquin County Multiple-Species Habitat Conservation and Open Space Plan. As a participant of conservation policies established by this Plan, developments within Lodi have the option to make payment of mitigation fees to support habitat conservation, except in cases where natural habitat is not affected by new development. These fees, applicable to lands within the Sphere of Influence, range from $845 - $1690 per acre, depending on the sensitivity of the habitat.

Under this plan, new development will pay 60 percent of the cost of protecting or providing replacement habitat. Development that results in the conversion of vernal pools will be responsible for 100 percent of the mitigation cost per the Plan's requirements. The Plan also includes options for developments to dedicate land for preservation and/or purchase mitigation credits in lieu of paying fees. As a voluntary plan, developers have the option to participate (or not) depending on site evaluation. Participation may increase or decrease the costs associated with mitigating the environmental impact, depending upon site specific conditions.

Storm Drainage and Flood Control

Some localized flooding occurs within areas of the City during extensive storm events. The City would be inundated by the 500-year storm along the Mokelumne River. The City is protected from flooding associated with the 100-year storm by a series of levees. To address localized flooding, Lodi owns and maintains the City's municipal storm drainage system, which consists of a series of curbs and gutters, catch basins, underground trunk pipelines, detention basins, and

pump stations. Storm water within the system is eventually conveyed to outfalls in either the Mokelumne River or the Woodbridge Irrigation District canal.

In general, the City's system has been designed and maintained sufficiently to serve the city's drainage needs. Issues related to older facilities include undersized pipelines and inadequate curbs and gutters within the downtown and eastside areas of the City. Development within the current City limits will not be constrained by storm drain and flood control issues.

The Housing Element identifies areas to the immediate west of the existing City limits to be annexed so that the City can meet its share of regional housing needs during the 2003-2009 planning period. Historically, the City has grown in increments, which has ensured the availability of public services such as storm drain facilities for new development, while avoiding adverse impacts to levels of service to existing residents. New development is assessed a development impact mitigation fee, which in part, funds the incremental improvements to the storm drain system. One of the City's major goals, identified in the General Plan is to maintain an adequate level of service in the City's water, sewer collection and disposal, and drainage system to meet the needs of existing and projected development.

As part of the growth management program, which regulates the amount of residential growth that can occur within a given year and has supported Lodi's desire to grow incrementally, the City requires that projects identify on- and off-site infrastructure improvements necessary to serve the project. Internal infrastructure is generally provided as part of the initial construction of a project. The areas that will be annexed as recommended by this Housing Element will be subject to comply with the city's regulations and policies related to storm drain facilities, which will alleviate any potential constraint the availability of storm drain facilities would have on housing construction.

Based on the City's incremental approach to annexation and the extension of the public facilities and services through the payment of development fees, Lodi does not anticipate that residential development will be impeded in the areas to be annexed due to drainage or flood control issues.

Water Service

The City of Lodi operates the potable water distribution system that serves all areas within the City limits. The City's water supply comes from groundwater via 25 municipal wells. The Water Master Plan indicates that the water supply is sufficient to meet future demand, maintaining a service standard of approximately one well per 2,000 people. The system is continually undergoing upgrades; although the placement of future wells may be limited by contamination in some areas east of the Lodi (proposed expansion to meet future housing needs is to the west and will not be affected by contamination). Anticipated water demand in 2009, approximately 49 million gallons per day, will be met by Lodi's existing system of municipal wells and transmission pipelines.

As discussed above, the City's desire to grow incrementally is addressed through the implementation of a growth management program and the levying of a development impact mitigation fee. Development that occurs within annexed areas will provide internal water transmission facilities and pay fees as appropriate for necessary off-site infrastructure. Water service will not be a constraint to the City's ability to meet future housing needs, therefore.

Sewer Service

The City of Lodi owns and operates the municipal wastewater system, which collects all domestic and limited industrial wastewater flows within the City limits. The City also owns and operates a wastewater treatment plant located six miles south of the city. The wastewater system is currently sufficient to support future growth through 2009 but may require expansion after that year. The plant's current capacity is 8.5 million gallons per day and is currently operating at 6.67 million gallons per day.

Developments are required by the City to construct sewer lines that are larger than necessary to support the proposed development. For construction of oversized sewer facilities, the City offers reimbursement for trunk sewer extensions above 10 inches in diameter. Sewer service is not currently a constraint in housing development.

The Housing Element identifies areas to the immediate west of the existing City limits to be annexed in order for Lodi to provide its share of the regional housing needs during the 2003-2009 planning period. As discussed above, the City's desire to grow incrementally is addressed through the implementation of a growth management program and the levying of a development impact mitigation fee. Development within annexed areas will provide internal sewer collection facilities and pay fees as appropriate for necessary off-site infrastructure. The expansion of sewer service to meet the City's future housing needs will not be a constraint, therefore.

IV. HOUSING STRATEGY

A. Introduction

The provision of housing is a critical concern for cities throughout California. The housing element is a city's major statement of local housing strategy, providing an integrated set of policies and programs to improve the condition and availability of housing.

1. Availability of Adequate Sites

Perhaps the most critical housing-related issue in Lodi is land availability: there is simply very little land within current City limits that is suitable for residential development and even fewer large parcels that could accommodate affordable housing at higher densities. The City's planning policies foster compact growth to make efficient use of land within the current City limits. Combined with the growth management program, the City has focused residential development on remaining vacant and underutilized infill parcels and properties on the edges of Lodi.

Lodi has attempted to use its growth management process to balance the competing demands of state land use and environmental policy and community preferences. Through its General Plan policies, the City emphasizes infill development, a compact community, residential neighborhoods that are accessible to commercial services, and higher densities in appropriate locations. Lodi has also used its planning powers and the growth management process to prevent premature conversion of prime agricultural land, protect natural resources that border the City, and ensure orderly and efficient extension of public facilities and services, each of which is a state policy objective that Lodi is required to implement.

Since 1990 the overwhelming majority of homes constructed Lodi have been single-family homes at seven dwelling units or fewer per acre, consuming more land than would be the case if the City had experience a wider mix of low, medium, and high density development according to General Plan land use policies. As a result, the City will need to annex land between 2003 and 2009 to accommodate its share of San Joaquin County's new construction housing needs under the San Joaquin County Council of Government's (SJCOG) housing allocation plan (see section II-G of the Housing Element, Future Housing Needs).

The City's growth management program will not create an insurmountable barrier to increasing the supply of land for residential development because areas identified to meet Lodi's future housing needs, nearly 600 acres, are designated in the General Plan for annexation to the City and eventual urban development. Preliminary infrastructure planning for the northern portion (Westside Facilities Master Plan) has been completed, which will expedite the process of approving development in the annexation areas. The City can also pre-zone the annexation areas and request that property owners provide conceptual land use plans as part of the annexation process to further expedite eventual development of these sites. An example of this process approximately 300-acres south of the Westside Facilities Master Plan area, in which the

landowners are currently working with the City to prepare a conceptual plan that will establish residential densities and development standards.

For the 2003 – 2009 period, the City can balance competing policy objectives through comprehensive planning and zoning for areas to the west of the current City limits to prepare these areas for annexation. Through this process, the City can designate locations for various land uses, including higher density residential development, at the time of annexation.

2. Management of Growth Through a Housing Allocation System

The Lodi General Plan establishes of a population-based 2.0 percent limit on the annual increase in the number of housing units to be implemented through a residential development allocation system. This Housing Element contains policies that give priority in the allocation process to projects that include housing units affordable to low- and moderate-income households and exempt senior citizen housing projects from the allocation process in implementing the growth management program.

This Housing Element further recommends that the growth management program exempt from the annual allocation process housing units affordable to very low- or low-income households. Through 2009, at least, the allocation process is not anticipated to represent a constraint due to the backlog of unallocated housing units, particularly in the medium and high density residential land categories. Beyond 2009, however, the City may reach a point at which it will need flexibility to allocate additional housing units affordable to lower-income households to meet its obligations under state law.

3. Demand for Housing and Housing Costs

Since the early 1980s, Lodi has assumed a role as a bedroom community for larger employment centers in Stockton, Sacramento, and the East Bay. Commuters have been attracted to the area by residential amenities that are either not available or are too costly in or near these employment centers. The result has been a significant increase in the demand for single-family housing in many Central Valley communities, including Lodi. The combination of this increased demand and the modest pace of new home construction in Lodi has caused the market value of housing in the City to increase significantly.

As a result of these changes in the local housing market, Lodi has experienced a growing incidence of unmet housing needs. Among these are:

- An increase in the number of low-income large families who cannot afford to purchase homes of sufficient size (three or more bedrooms) to meet their needs.

- An increase in the incidence of overcrowding (more than one person per room) to 20 percent of renter households and six percent of homeowners. The higher percentage of overcrowded households is primarily a result of the higher number of low-income large families (as noted above) and secondarily a result of an increase in the number of small families sharing housing (up by nearly 50 percent since 1990).

- An increase in households paying more than 30 percent of their incomes for housing—44 percent of renters and 24 percent of homeowners. The increase in overpayment is largely the result of a growing gap between housing costs and growth in income, fueled in part by an influx of family households with low- to moderate-incomes.

- A continued need to conserve and rehabilitate existing housing. As many as 5,500 dwelling units may need some form of repair or rehabilitation, ranging from deferred maintenance to substantial rehabilitation or replacement.

- There is a shrinking supply of affordable rental housing for lower-income households in Lodi. There is only one rental property with 40 units in Lodi that has restricted rents levels affordable to low-income households. Other rental properties that may have lower rents are subject to market forces, and many lower-cost rental units are in substandard condition.

- There is also a declining ownership opportunity for low- and moderate-income households, despite the short-term trend since 2000 of low mortgage interest rates Mobilehomes, or manufactured housing, provide an affordable ownership option for many households in Lodi. There are eight mobilehome parks in the City that provide spaces for approximately 500 mobilehomes. Some of these parks may be subject to rising land values and economic pressures that could jeopardize their continued existence, while others may be too small and/or lack sufficient amenities to be viable in the long run as mobilehome parks.

As a result of these trends, several population groups have become particularly vulnerable to the rise in housing costs, overpayment, overcrowding, and the potential for living in substandard housing. These groups include very low-income and frail seniors, very low-income farmworker households, persons with disabilities that affect their ability to live independently, and single parents (particularly single mothers with children).

4. Infill Development and Retention of Affordable Housing

One of the effects of limited development opportunities on the periphery of Lodi has been an inward focus on housing development, with increased concentration on infill development and residential intensification in existing neighborhoods. This inward focus has been most evident in the Eastside area, where a significant portion of the existing housing stock was replaced with more intensive and higher density development between the 1960s through 1980s. One result of this activity has been the loss of affordable single-family homes. The loss of this important residential asset prompted the City to rezone the Eastside area to prevent further conversion of single family homes to multifamily units. In doing so, the City hopes to accomplish three fundamental goals: (1) to retain the single family character of the neighborhood; (2) to maintain a stock of affordable single family units in Lodi; and (3) to limit the added stress that intensification would place on the City's infrastructure. In conjunction with this rezoning, the City targeted the Eastside area for major rehabilitation efforts.

To replace the loss of residential development potential in the Eastside area, particularly affordable housing development potential, the City will designate areas within the western

annexation areas (including the Westside Facilities Master Plan area) for medium and high density residential development, as discussed in Chapter III, Resources and Constraints.

B. Goals and Policies

Goal A: To provide a range of housing types and densities for all economic segments of the community while emphasizing high quality development, homeownership opportunities, and the efficient use of land.

Policies

1. The City shall promote the development of a broad mix of housing types through the following mix of residential land uses: 65 percent low density, 10 percent medium density, and 25 percent high density.

2. The City shall regulate the number of housing units approved each year to maintain a population-based annual residential growth rate of 2.0 percent, consistent with the recommendations of the Mayor's Task Force and the growth management ordinance.

3. The City shall continue to exempt senior citizen housing projects from the growth management ordinance.

4. The City shall exempt very low- and/or low-income housing units from the growth management ordinance.

5. The City shall maintain and regularly update its land use database to monitor vacant residential land supply.

6. The City shall pursue available and appropriate state and federal funding programs and collaborate with nonprofit organizations to develop affordable housing.

7. The City shall promote the expeditious processing and approval of residential projects that conform to General Plan policies and City regulatory requirements.

8. The City shall seek to reduce the cost impact of its policies, regulations, and permit procedures on the production of housing, while assuring the attainment of other City objectives.

9. The City shall grant density bonuses of at least 25 percent and/or other incentives in compliance with state law for projects that contain a minimum specified percentage of very low-income, low-income, ~~or~~ qualifying senior housing units or units designed to facilitate individuals with physical challenged.

10. The City shall seek to intersperse very low- and low-income housing units within new residential developments and shall ensure that such housing is visually indistinguishable from market-rate units.

11 The City shall continue to allow and encourage the development of a variety of housing and shelter alternatives, both renter and owner, to meet the diverse needs of the City's population.

12. The City shall promote the development of senior and other special needs housing near, and/or with convenient public transportation access to, neighborhood centers, governmental services, and commercial service centers.

13. The City shall encourage infill residential development and higher residential densities within the existing City limits near transit stops, and compact development patterns in annexation areas to reduce public facility and service costs, avoid the premature conversion of natural resource and agricultural lands, and reduce the number of trips from private vehicles.

Goal B: To encourage the maintenance, improvement, and rehabilitation of the City's existing housing stock and residential neighborhoods, particularly in the Eastside area.

Policies

1. The City shall encourage private reinvestment in older residential neighborhoods and private rehabilitation of housing.

2. The City shall prohibit the conversion of existing single-family units to multifamily units on residentially zoned properties less than 6,000..

3. The City shall use available and appropriate state and federal funding programs and collaborate with nonprofit organizations to rehabilitate housing and improve older neighborhoods.

4. Housing rehabilitation efforts shall continue to be given high priority in the use of Community Development Block Grant (CDBG) funds, especially in the Eastside area.

5. The City shall support the revitalization of older neighborhoods by keeping streets and other municipal systems in good repair.

6. The City shall allow reconstruction of existing housing in the Eastside area and in commercially or industrially designated areas in the event such housing is destroyed or damaged.

7. The City shall implement historic preservation guidelines to preserve historically significant residential structures and insure that infill projects fit within the context of the neighborhood. (See the Urban Design and Cultural Resources Element for implementation of this policy.)

8. The City shall continue to enforce residential property maintenance standards.

Goal C: To ensure the provision of adequate public facilities and services to support existing and future residential development.

Policies

1. The City shall support the use of CDBG funds for the upgrading of streets, sidewalks, and other public improvements.

2. The City shall ensure that new residential development pays its fair share in financing public facilities and services and will pursue financial assistance techniques to reduce the cost impact on the production of affordable housing.

3. The City shall ensure that all necessary public facilities and services shall be available prior to occupancy of residential units.

5. The City shall require that park and recreational acquisitions and improvements keep pace with residential development.

Goal D: To promote equal opportunity to secure safe, sanitary, and affordable housing for all members of the community regardless of race, sex, or other arbitrary factors.

Policies

1. The City shall seek to address the special housing needs of persons with disabilities, lower-income large families, seniors, single-parent households, farmworkers, and persons in need of temporary shelter.

2. The City shall make available to the public information on nonprofit, county, state, and federal agencies that provide education, mediation, and enforcement services related to equal housing opportunity.

3. The City shall establish regulations that govern the conversion of apartments and mobile home parks to condominiums to reduce the displacement of lower-income households.

4. The City shall work with surrounding jurisdictions to address the needs of the homeless on a regional basis.

5. The City shall cooperate with community-based organizations that provide services or information regarding the availability of assistance to the homeless.

6. The City shall continue to promote fair housing programs and services to residents and property owners in Lodi.

Goal E: To encourage residential energy efficiency and reduce residential energy use.

Policies

1. The City shall require the use of energy conservation features in the design and construction of all new residential structures and shall promote the use of energy conservation and weatherization features in existing homes.

2. The City shall require solar access in the design of all residential projects.

3. The City shall pursue residential land use and site planning policies, and promote planning and design techniques, that encourage reductions in residential energy consumption.

C. Implementation Programs

The following programs describe actions that the City intends to implement during the time frame of this Housing Element (2001 through 2009). For some of these programs, the description includes a target (quantified objective) for the number of units to be produced or households to be assisted during the Housing Element time frame. The households to be assisted are listed by income category as defined by annual income guidelines for San Joaquin County of the California Department of Housing and Community Development. For 2003, the median income for a family of four under the state guidelines is $50,600. The income categories and their corresponding 2003 income ranges are shown in Table IV-1. Unless otherwise noted, the use of the phrase "very low-income" includes extremely low-income households.

Table IV-1: Target Income Categories

Income Category	Percentage of County Family Median Income	2003 Income Range (family of four)
Extremely Low	0 to 30 percent	$0 to $15,200
Very Low	31 to 50 percent	$15,201 to $25,300
Low	51 to 80 percent	$25,301 to $40,500
Median Income	100 percent	$40,501 to $50,600
Moderate	81 to 120 percent	$50,601 to $60,700
Above Moderate	120 percent and above	$60,701 and above

Goal A: To provide a range of housing types and densities for all economic segments of the community while emphasizing high quality development, homeownership opportunities, and the efficient use of land.

Program 1: Zoning Ordinance Revisions

The City shall revise Title 17 of the Lodi Municipal Code (Zoning Ordinance) to reduce barriers to, and provide incentives for, the construction and conservation of a variety of housing types. Revisions to Title 17 will include the following:

a. The addition of a chapter that provides for density bonuses and other incentives for projects that include ten percent very low-income housing, 20 percent low-income housing, 50 percent qualifying senior housing, or 20 percent moderate-income hosing in condominium conversion projects, in compliance with Sections 65915 – 65918 of the California Government Code. The City shall work with the San Joaquin County Housing Authority in developing procedures and guidelines for establishing income eligibility for the "reserved" units and for maintaining the "reserved" units as affordable units for at least 30 years. The City shall seek Housing Authority administration of the reserved units. The City shall establish a program to publicize the availability of the density bonus program through the City's website, program information at the Community Development Department public counter, and pre-development meetings with housing providers (such as the housing unit allocation stage). The City shall encourage prospective housing developers to use the density bonus program at pre-development meetings. In conjunction with density bonuses, the City will offer one or more regulatory incentives, as needed and appropriate, such as:

   - Reduced parking for projects oriented to special needs groups and/or located close to public transportation and commercial services;
   - Expedited permit processing; or
   - Deferral of fees for an appropriate time period to allow for the project to begin generating income.

b. Conformance with California Government Code sections 65852.3 and 65852.7, which require that manufactured homes in single-family zones on permanent foundations be permitted under the same standards as site-built homes (with limited exceptions) and that mobilehome parks be permitted in any residential zone (although the City may require a use permit).

c. Addition of standards for emergency shelters and transitional housing to clearly identify appropriate zoning districts and locations for such facilities and to make these sites readily accessible. Until the adoption of such revisions to the Zoning Ordinance, the City will continue to allow by right the development of such facilities in areas zoned C-M or C-2.

d. Addition of a definition of farmworker housing that does not conflict with state law definitions for employees housing (beginning with California Government Section 17000) and specification of the zoning districts and standards under which such housing will be permitted.

e. Clarification of standards for permitting residential care facilities (such as group homes). The City will specify that all such facilities with six or fewer residents are permitted in residential zoning districts. The City will also designated zoning districts in which facilities of seven or more persons will be permitted through a use permit and standards for such facilities.

f. Revision of off-street parking requirements (Chapter 17.60) to allow for less than two spaces per multifamily dwelling unit with fewer than two bedrooms when justified due to the characteristics of the occupants (such as seniors, persons with disabilities, or low-income single working adults) and/or the project location (such as along a public transit route or in the downtown area).

g. Revision of standards for second dwelling units to allow the conversion of accessory buildings to second units subject to compliance with all other zoning and parking standards, an appropriate minimum lot size for detached second units, and architectural compatibility with the main dwelling unit. The City will permit second dwelling units through an administrative permit process in compliance with state law (California Government Code section 65852.2).

h. Elimination of single-family homes as permitted uses in the R-GA, R-MD, R-HD, and R-C-P zones, except on parcels constrained by lot size, environmental, or other factors that would make the construction of multifamily housing infeasible.

i. Reduction in the number of non-residential uses permitted in multifamily residential zones to public and quasi-public uses and supportive services for multifamily residents.

Responsibility:	Community Development Department, Planning Commission, City Council
Timeframe:	Complete zoning code amendments as part of a new unified development code by June 2004.
Funding:	General Fund
Objective:	Reduce regulatory barriers to the provision of housing

Program 2: Revise Growth Management Program

The City will revise its growth management program to exempt housing units affordable to very low- or low-income households with long-term affordability restrictions.

Responsibility:	Community Development Department
Timeframe:	Begin second round of allocations, if needed, in 2005 and annually thereafter
Funding:	Application fees
Objective:	Expedite the residential development approval process

Program 3: Personal Security Standards

The City will continue to implement design standards applicable to all new residential projects with the objective of improving the personal security of residents and discouraging criminal activity. Design standards will address issues such as the placement of landscaping, accessory buildings, and accessory structures in a manner that does not impede the City's ability to conduct neighborhood police patrols and observe potential criminal activity; lighting and other security measures for residents, and the use of materials that facilitate the removal of graffiti and/or increase resistance to vandalism.

Responsibility:	Community Development Department
Timeframe:	Current and ongoing, 2003 – 2009
Funding:	Permit fees
Objective:	Reduce the susceptibility of residential properties and neighborhoods to criminal activity and increase residents' perception of personal safety

Program 4: Land Inventory

The City shall prepare and maintain a current inventory of vacant, residentially zoned parcels and a list of approved residential projects, and shall make this information available to the public and developers, including information on underutilized sites within the downtown area with residential or mixed-use development potential. The City shall update the inventory and list at least annually. The City will promote the land inventory and the availability of each update through the City's web site, a notice at the Community Development Permit Counter, and a press release subsequent to each update.

To encourage the maximum efficient use of land within the current City limits, Lodi will also conduct a study of residential development potential on underutilized industrial and commercial sites along Cherokee Lane, South Sacramento Street, South Stockton Street, and West Kettleman Lane. Properties along these corridors may be suitable for future residential development if sufficient land can be consolidated to make such development feasible. These areas are characterized by obsolete patterns of land development, older structures in substandard condition, odd-sized lots, and marginally viable commercial and industrial uses that would make properties ripe for redevelopment in the next five to ten years. If Lodi determines that residential development is feasible along these streets, the City will initiate a planning process with property owners (which may be a special area plan or a specific plan meeting state law requirements) to define specific properties suitable for residential or mixed-use development, appropriate development standards, and improvements needed to support residential development.

Responsibility:	Community Development Department, Planning Commission, City Council
Timeframe:	Complete study of residential development potential by December 2006; prepare and adopt area plan(s) by December 2009.
Funding:	General Fund, contributions from property owners
Objective:	Increase the potential for infill development, thereby reducing the need to prematurely annex land and convert agricultural land to urban use

Program 5: Pursuit of State and Federal Funds in Support of Housing Construction

The City shall pursue available and appropriate state and federal funding sources to support efforts to construct housing meetings the needs of low-and moderate-income households, to assist persons with rent payments required for existing housing units, to provide supportive services, and to provide on- and off-site improvements and public facilities, in support of affordable housing projects. The City will take the following actions in pursuit of state and federal funding:

a. Meet annually with private nonprofit and for-profit affordable housing providers and public agencies that are interested in constructing affordable housing, providing special needs housing or shelter, and/or providing supportive services for low-income and special needs residents. The purpose of the annual meetings will be to discuss priorities for lending City support for funding requests for affordable housing projects and programs during the subsequent 12 to 24 months. The City will promote these annual meetings through direct notices to private and public entities that have provided housing or supportive services in Lodi, or that expressed an interest in doing so, in the past.

b. Provide support to other entities (nonprofit organizations, for-profit affordable housing providers, and public agencies) that apply directly for state or federal funds. Examples of support to be provided by the City include: 1) expedited processing of planning permits that are needed before an applicant can submit a state or federal funding request or receive funds; 2) providing information to complete a funding request (such as demographic, housing, or economic statistics in support of an application); and 3) letters of support for projects or programs that the City has approved (including preliminary or conceptual approval).

c. Apply directly for state and federal funding under programs in which the City must be the applicant. The City will directly apply for funding only when there is no feasible alternative. Given limitations on City staff expertise and availability, the preferred method of accessing state and federal funding will be actions 7(a) and 7(b).

In pursuing state and federal funding, and working with other private and public entities to provide affordable housing, the City will seek to increase the availability of housing and supportive services to the most vulnerable population groups and those with the greatest unmet needs, such as very low-income and frail seniors, persons with disabilities who cannot live independently, farmworkers and their families, low-income large families, and single-parent households, particularly those with small children.

Responsibility: Community Development Department

Timeframe: For action 7(a), annual meetings, 2003 – 2009; for action 7(b), quarterly each year, depending on funding deadlines for specific state and federal programs, 2003 – 2009; for action 7(c) semi-annual review and assessment of funding opportunities based on: 1) funding cycles and eligible activities for various state and federal programs, 2) projects and programs proposed to the City for state or federal funding, and 3) City staff capacity to prepare funding requests

Funding: California Multifamily Housing Program
California Housing Finance Agency (HELP Program)
Low-Income Housing Tax Credits (state & federal)
CalHome Program
Federal Home Loan Bank – Affordable Housing Program
Enterprise Foundation
Special Housing Needs and Supportive Services, Federal Department of Housing and Urban Development Programs – Section 221(d), Section 202 (elderly), Section 811 (persons with disabilities)
Child Care Facilities Finance Program (administered through the State of California)

Objective: 150 very Low-income housing units
100 low-income housing units

Program 6: Encourage Efficient Use of Land for Residential Development

The City will investigate incentive and regulatory tools to encourage efficient use of land designated or held in reserve for urban development within the existing Lodi Sphere of Influence to reduce the premature conversion of agricultural land to urban use. If determined to be feasible, the City will adopt one or more incentives or regulations. Examples of approaches the City will study and consider are:

- A requirement to mitigate the loss of Prime Farmland through the payment of a fee. Fees collected by the City will be used to foster agricultural production in the Lodi area. This program may fund marketing, research, land acquisition and other programs necessary to promote agricultural production. An option that the City may consider to promote the production of affordable housing is to have this program tied to a sliding scale based on dwelling units per acre. If a development is at the Land Use Element mandated 65% Low Density/10% Medium Density/35% High Density, equivalent to 9.85 dwelling units per acre, then no fee would be collected, a higher density would be provided with a credit while a lower density would be subject to the fee.

- The use of transferred development rights (TDRs) that can be applied to designated areas within the Sphere of Influence. The TDRs might be combined with a density bonus program for agricultural preservation to increase the number of opportunities to use the TDRs. An option that the City of Lodi may consider is to designate sending and receiving areas. A potential sending area for the program could be approximately 0.25 miles south of Harney Lane to Armstrong Road in the area currently designated as Planned Residential Reserve by the Land Use Element of the General Plan. The receiving area for this program could then be designated to areas north of Harney Lane in the Planned Residential portion of the General Plan.

- The use of transitional land use categories, such as residential estates, to provide a further buffer between more intense urban land uses and agricultural land uses.

Responsibility:	Community Development Department, Planning Commission, City Council,
Timeframe:	Complete study and recommend incentives and regulations by June 2005; City Council to adopt incentives or regulations by December 2005.
Funding:	General Fund
Objective:	Preserve agricultural land and reduce the amount of land needed to meet future urban growth needs

Program 7: Rental Assistance

The City shall continue to support the San Joaquin County Housing Authority in its administration of the Housing Choice Voucher rental assistance program (formerly called Section 8 Program). The City's support will include distribution of program information at the Community Development public counter, distribution of program information to rental property owners as part of the City's code enforcement activities, creation and maintenance of a link to the Housing Authority's website on the City's web site, and annual meetings with representatives of the Housing Authority to discuss actions the City can take to encourage greater participation in the Voucher Program by rental property owners.

Responsibility:	Community Development Department
Timeframe:	Distribution of Housing Choice Voucher Program information, current and ongoing, 2003 – 2009; create website link to Housing Authority website by March 2004, maintain link thereafter, 2003 – 2009.
Funding:	General Fund
Objective:	Increase rental property owner awareness of, and participation in, rental assistance programs

Program 8: Neighborhood Improvement

The City will continue to designate a staff position, Community Improvement Manager (CIM), within the Community Development Department to focus on the implementation of housing and neighborhood improvement programs. Among the duties of the CIM are to:

- Enforce City codes and ordinances pertaining to neighborhood maintenance and supervise code enforcement staff;
- Develop programs and plans to produce housing, especially affordable housing, by means of new construction, rehabilitation or acquisition;
- Implement neighborhood improvement programs on a city-wide basis and develop neighborhood improvement strategies;
- Ensure compliance with federal and state laws and regulations and consistency with local objectives and community requirements;

- Prepare a variety of reports on housing preservation and development, neighborhood improvement and code enforcement, and other related City activities; and

- Manage programs for housing rehabilitation, first-time buyer and code enforcement.

Responsibility: Community Development Department
Timeframe: Current and ongoing, 2001 – 2009
Funding: CDBG, fees, General Fund
Objective: Improve the City's ability to focus on the implementation of housing and neighborhood improvement programs

Program 9: Annexation of Land to Accommodate Future Housing Needs

The City will work with property owners of approximately 600 acres outside the current City limits, but within Lodi's Sphere of Influence (SOI), to plan for, and annex the land to the City so that additional residential development opportunities can be provided to meet Lodi's future housing construction needs. The 600 acres is located between Harney Lane, Lower Sacramento Road, the Woodbridge Irrigation District canal, and the western SOI boundary. The City has facilitated a specific planning process with property owners of approximately 300 acres to prepare these sites for annexation to the City. The development potential for the properties to be annexed is summarized in Table II-1B.

The City does not need to annex all 600 acres within the next three to six years to meet housing construction needs given the backlog of unused housing allocations and available sites within the current City limits, but will initiate the process with property owners during the 2003 – 2009 period.

Responsibility: Community Development Department, Planning Commission, City Council
Timeframe: Annex initial 300 acres by December 2005; annex remaining land by December 2009.
Funding: Annexation and permit fees
Objective: Increase the City's residential development capacity to accommodate its share of the region's future housing construction needs between 2001 and 2009, and subsequent years, under the San Joaquin County Council of Governments housing allocation plan

Program 10: Homebuyer Assistance

The City will continue to implement a first-time homebuyer down payment assistance program. The City will continue to participate with the Housing Authority in a countywide consortium for the issuance of mortgage revenue bonds or mortgage credit certificates to assist first-time homebuyers. The City will promote the program by providing information at the Community Development Department's public counter and by providing a link to the program on the City's web site. The City's Community Improvement Manager will contact real estate agents active in Lodi to identify opportunities for program participation. Because the availability of homes within

the program price limits is extremely limited in Lodi, there will likely be a small number of assisted homebuyers.

Responsibility: Community Development Department

Timeframe: Current and ongoing, 2003 – 2009; provide website link and information at the public counter by June 2004; Community Improvement Manager to meet with local realtors by June 2004.

Funding: CDBG, HOME, CalHOME, CalHFA Down payment Assistance Programs, Mortgage Credit Certificates or Mortgage Revenue Bonds (through San Joaquin County or a local government consortium)

Objective: 50 homebuyers

Program 11: Commercial Linkage Fee

The City will undertake a "nexus" study to determine whether a direct connection exists between non-residential development in Lodi that creates jobs and the need for housing affordable to lower-income workers who will fill some of those jobs. The study will attempt to estimate:

- Projected employment growth by industry and occupation based on land use policies in the General Plan, zoning regulations, and development trends;
- The difference between the cost to develop housing in Lodi and the amount that lower-income households can afford to pay for housing (the subsidy gap needed to make housing affordable); and
- The dollar amount per square foot, by industry or land use category, that non-residential developments would need to pay to close the subsidy gap.

Should the City determine that both: 1) a nexus exists between nonresidential development and the demand for housing affordable to lower-income households and 2) a significant subsidy gap exists between the cost to develop housing and the amount that lower-income households can afford to pay for housing, the City will consider assessing an impact fee ("commercial linkage fee") on nonresidential development that will be used to provide affordable housing in Lodi.

The City will rely on the following criteria in its decision on whether to charge an impact fee and the amount of such a fee, if assessed:

1. The cost impact on nonresidential development and whether a commercial linkage fee would adversely affect achievement of the City's economic development goals;
2. Similar impact fees, if any, charged in nearby jurisdictions and whether such a fee in Lodi would affect the City's competitive position in attracting job-creating land uses; and
3. The potential of such a fee, compared to other techniques, to significantly increase the supply of affordable housing in Lodi.

Responsibility: Community Development Department, City Council

Timeframe: Complete nexus study and determine the feasibility of adopting a commercial linkage fee by December 2004; if determined to be feasible, adopt a fee by June 2005

Funding: General Fund to conduct study, linkage fee to fund affordable housing (if adopted)

Objective: Increase local funding options for affordable housing and improve the balance between the supply of housing affordable to the local workforce and anticipated job creation

Goal B: To encourage the maintenance, improvement, and rehabilitation of existing housing and residential neighborhoods, particularly in the Eastside area, and the preservation of existing affordable housing.

Program 12: Demolition of Residential Structures

The City shall implement policies and procedures for evaluating applications for demolition of residential structures. This evaluation shall consider the implications of the demolition with respect to the retention of affordable housing. If demolitions are deemed to result in a reduction of the amount of affordable housing in Lodi, the City shall require the proponent of the demolition to cooperate with the City in providing relocation assistance to displaced residents and in determining the means for replacing demolished units. The City will provide information regarding its policies and procedures on the City's website and at the Community Development Department's public counter.

The City will determine the most appropriate method of implementing this program through a review of past demolition permits and conditions.

Responsibility: Community Development Department
Timeframe: Complete review by December 2004; implement new review procedures by June 2005, ongoing thereafter through 2009, based on proposals to demolish residential structures
Funding: Permit fees, property owner contribution
Objective: Maintain or replace existing affordable housing

Program 13: Housing Rehabilitation and Code Enforcement

The City will continue to combine code enforcement and housing rehabilitation assistance, targeted to the Eastside area. The City will promote its program through the Eastside Improvement Committee, a neighborhood organization that provides direct outreach to area residents and property owners, by providing information at the Community Development Department's public counter, and through a link to the program on the City's website. The City's Community Improvement Manager will work with the Committee to continue marketing the program to Eastside area residents and property owners.

Responsibility: Community Development Department
Timeframe: Current and ongoing, 2003 – 2009
Funding: CDBG and HOME, CalHOME
Objective: Improvement of 1,000 housing units (including private investment to correct code violations) over five years

Program 14: Property Maintenance and Management Standards

The City will continue to implement standards for private property maintenance (Chapter 15.30 of the Municipal Code) to 1) control or eliminate conditions that are detrimental to health, safety, and welfare; 2) preserve the quality of life and alleviate certain socioeconomic problems created by physical deterioration of property; and 3).protect property values and further certain aesthetic considerations for the general welfare of all residents of the City of Lodi.

Responsibility:	Community Development Department
Timeframe:	Code enforcement on both complaint and pro-active basis, 2003 – 2009
Funding:	Inspection fees, code violation penalties, CDBG funds (for dwelling units occupied by low-income households)
Objective:	Eliminate substandard building and property conditions

Program 15: Housing Condition Survey

The City will conduct a housing survey to document its efforts at improving housing conditions and to identify future areas and housing types for targeting its code enforcement, housing rehabilitation assistance, and neighborhood improvement efforts.

Responsibility:	Community Development Department
Timeframe:	Complete survey and report to the City Council by June 2005
Funding:	CDBG, General Fund
Objective:	Document housing conditions and establish priorities for future code enforcement, housing rehabilitation assistance, and neighborhood improvement efforts

Program 16: Preservation of Affordable Rental Housing

There is one subsidized rental housing project in Lodi (Creekside South Apartments) that contains 40 housing units affordable to low-income households. These units are at risk of converting to market rate housing. To preserve Creekside South as affordable rental housing for low-income households, the City will coordinate a meeting or series of meetings between the Housing Authority, local nonprofits, and the owner (or owner's representative) to discuss the owner's intentions to remain or opt out of the federal Housing Choice Voucher (Section 8) Program and future plans for the property. If the owner intends to convert the apartments to market rate housing or sell the property, Lodi will seek to facilitate the acquisition of the property by a nonprofit or other entity to preserve the rental units as affordable housing. The City will not take part directly in negotiations regarding the property, but will apply for state or federal funding on behalf of an interested nonprofit entity, if necessary, to protect the affordability of the rental units. Lodi will request that the property owner provide evidence that it has complied with state and federal regulations regarding notice to tenants and other procedural matters related to conversion and contact HUD, if necessary, to verify compliance with notice requirements.

Responsibility:	Community Development Department
Timeframe:	Meet with property owner and other interested parties by December 2004

Funding: Minimal administrative cost to coordinate meetings; CDBG, HOME CalHFA, Multifamily Housing Program, and Section 207 Mortgage Insurance for Purchase/Refinance (HUD) as potential funding sources for preservation

Objective: To preserve 40 affordable rental housing units

Program 17: Mobilehome Park Preservation

Lodi will meet with mobilehome park owners to discuss their long-term goals for their properties and the feasibility of preserving these parks. Feasibility will be evaluated based on the condition of park infrastructure and buildings, the condition of mobile homes located in the park, parcel size, accessibility to services, and surrounding land uses. Several of the parks are small (with fewer than 50 spaces) and may not be prime candidates for preservation. For those parks that are feasible to preserve, the City will:

- Assist property owners in accessing state and federal funds for park improvements by preparing funding requests, providing information to park owners on state and federal programs, and/or providing referrals to nonprofit organizations who can assist in preparing funding requests.

- Facilitate a sale to park residents of those mobile home parks the City has targeted for preservation and whose owners do not desire to maintain the present use. If necessary to facilitate a sale, the City will seek state and federal funding to assist residents in purchasing, improving, and managing their parks and/or seek the assistance of a nonprofit organization with experience in mobile home park sales and conversion to resident ownership and management.

The City shall also require, as condition of approval of change of use, that mobilehome park owners who desire to close and/or convert their parks another use provide relocation or other assistance to mitigate the displacement of park residents, as required by California Government Code Section 65863.7. The City shall also require the park owner to provide evidence of resident notification of intent to close and/or convert the mobilehome park, as required by state law.

Responsibility: Community Development Department

Timeframe: Meet with property owner and other interested parties by December 2004

Funding: CDBG, HOME California Housing Finance Agency HELP program, California Mobilehome Park Resident Ownership Program

Objective: To preserve approximately 400 mobilehomes and spaces in mobilehome parks with the highest feasibility for continued operation

Program 18: Preservation of the Eastside Area

The City will continue to target a portion of its annual CDBG allocation for public improvements in the Eastside area in support of its housing rehabilitation and neighborhood improvement activities. The City will also maintain the Eastside single-family residential zoning as a regulatory

tool to preserve the character of the neighborhood and encourage private investment in older homes.

Responsibility:	Community Development Department, Planning Commission, City Council
Timeframe:	Annual CDBG allocation, maintain zoning, 2003 - 2009
Funding:	CDBG, permit fees, impact fees
Objective:	To preserve and improve the Eastside area.

Program 19: Redevelopment Agency Funding

Should the City Council adopt a redevelopment project area between 2003 and 2009, at least 20 percent of any tax increment funds accruing to the Agency will be used to support low- and moderate-income housing projects and programs. The City will also adopt an implementation plan that provides funding for public improvements to the downtown and residential neighborhoods within the redevelopment project area.

Responsibility:	City Council, Community Development Department
Timeframe:	Unknown at present—depends on the City Council's decision to activate the Agency and implement the plan
Funding:	Redevelopment tax increment
Objective:	To preserve and improve the downtown and residential areas within the proposed redevelopment project area

Goal C: To ensure the provision of adequate public facilities and services to support existing and future residential development.

Program 20: Development Impact Fees and Improvement Requirements

The City will continue to collect a unified development impact fee to pay for off-site public facilities and services needed for residential development and require that residential developers continue to provide on-site infrastructure to serve their projects. The City shall continue to charge fees that reflect the actual cost of service provided to housing units anticipated by this Element. Prior to the issuance of building permit, the City will require evidence that the developer has paid the required school impacts fees.

The City will review and adjust its fee formula for multifamily dwelling units in the medium and high density general plan land use designations so that the fee encourages the development of higher density affordable housing units while corresponding with the estimated public facility and service impact for the specific project being proposed. The review and adjustment is anticipated to result in a reduction of fees for some multifamily projects.

Water: The City shall insure the integrity of water delivery service by constructing and operating wells.

Wastewater: The City shall insure the provision adequate facilities and lands to effectively treat domestic wastewater while minimizing potential land use conflicts.

Streets: The City shall insure that streets are designed and constructed that meet the intended development density while minimizing housing costs.

Parks: See Program 22.

Emergency Services: The City shall continue to insure that new housing developments are serviced in accordance with the goals and policies of the Safety Element.

Responsibility:	Community Development Department, Planning Commission, City Council
Timeframe:	Submit proposed fee schedule adjustment to Planning Commission by July 2004, City Council to adopt new fee schedule by December 2004
Funding:	General Fund
Objective:	Reduce impact fees for multifamily projects based on actual project densities

Program 21: Growth Management Program

The City will continue to use its growth management program to insure that the pace of development is consistent with the City's, the Lodi Unified School District's, and other public facility and service providers' abilities to provide public facilities and services and maintain minimum facility and service standards for the entire community. The City will contact other public facility and service providers annually during the housing unit allocation process to insure that these agencies can serve the increased number of housing units to be allocated.

Responsibility:	Community Development Department, Planning Commission, City Council
Timeframe:	Annually during housing allocation process, 2003 - 2009
Funding:	Application fees, development impact fees
Objective:	To provide public facilities and services meeting minimum City standards

Program 22: Use of CDBG Funds

The City will continue to use CDBG funds to upgrade public facilities and services in older neighborhoods (see Program 17 for implementation).

Program 23: Park and Recreation Facilities

The City will annually review its Park and Recreation impact fee to ensure that these fees, in combination with other funds that may be available to the City, will allow Lodi to acquire and improve sufficient parkland and provide recreation facilities according to the minimum standards contained in the General Plan Parks, Recreation, and Open Space Element.

Responsibility: Community Development Department, Planning Commission, City Council
Timeframe: Annually prior to the adoption of a City budget, 2003 - 2009
Funding: Development impact fees, state grants for parkland acquisition, private foundation and individual donations
Objective: To provide park and recreation facilities and services meeting minimum General Plan standards

Program 24: Transit Facilities and Transit-Oriented Development

To coordinate the availability of public transit as Lodi develops and to support transit-oriented development on infill sites and properties with re-use potential, the City shall:

a. Insure the continued construction of transit facilities, to be paid from traffic impact fees, state, and federal funding sources, and "Measure K" sales tax funds to facilitate service provision and lower the cost of living within the community.

b. Determine whether areas with infill/reuse potential (see Program 4) qualify as infill opportunity zones. The City shall designate qualified areas that are appropriately located for higher density residential and mixed-use developments in such zones, near transit facilities.

c. If adopted under action "b," promote development opportunities in infill zones through a link on the City's website, an information bulletin to be distributed to property owners within these zones, and developers and business organizations in Lodi, and one or more meetings with business and community organizations to explain the benefits and implications of infill zone designation for development opportunities.

Responsibility: Community Development Department, Planning Commission, City Council
Timeframe: Action a: annually prior to the adoption of a City budget, 2003 – 2009
Action b: Identify eligible areas by December 2004, designate infill opportunity zones by June 2005, and identify and adopt zoning amendments that are needed and appropriate to develop within infill opportunity zones by December 2005
Action c: Create website link and distribute promotional literature by December 2005; conduct one or more community meetings between January and June, 2006
Funding: Development impact fees, state, and federal transportation funds
Objective: To increase housing opportunities near transit facilities and encourage forms of travel other than private vehicles

Goal D: To promote equal opportunity to secure safe, sanitary, and affordable housing for all members of the community regardless of race, sex, or other arbitrary factors.

Program 25: Fair Housing Services

The City shall continue to promote equal housing opportunity for all persons in compliance with state and federal laws by continuing to provide funding for the operation of the City's Affirmative Fair Housing Program. Under the program, the City provides information to the public on state and federal fair laws, provides referrals to county, state, and federal agencies for investigation of fair housing complaints, and provides financial support to Stockton/San Joaquin Community Housing Resource Board (CHRB), which provides landlord-tenant mediation services.

The City will collaborate with CHRB to promote fair housing information and resources at an annual community event . Lodi will promote fair housing activities and resources by providing links through its website to nonprofit, county, state, and federal agencies; providing fair housing information at the Community Development Department public counter; designating a point of contact within the Department to handle fair housing inquiries; and distributing fair housing information at public locations in the City (such as the Lodi Public Library and the Loel Senior Center).

Responsibility: Community Development Department
Timeframe: Current and ongoing, 2003 – 2009; annual community event for display of fair housing information beginning in 2005
Funding: CDBG
Objective: To provide public facilities and services meeting minimum City standards

Program 26: Special Housing Needs

The City shall continue to implement zoning standards, provide regulatory incentives, work with nonprofit and other private housing providers, and provide financial assistance, within the City's limited fiscal capacity, to facilitate the development and operation of housing meeting the needs of special population groups. See programs 1, 5, and 18 for implementation

Program 27: Condominium Conversion

The City shall continue to regulate the conversion of rental housing and mobilehome parks to condominium or stock cooperative ownership to reduce the displacement of low- and moderate-income households. The City will implement requirement in Title 15 of the Lodi Municipal Code, which govern condominium conversion. (See Program 16 for implementation on mobilehome park conversion.)

Responsibility: Community Development Department, Planning Commission, City Council
Timeframe: Current and ongoing, 2003 - 2009

Funding: Application fees
Objective: To minimized the impact of displacement of low- and moderate-income households

Program 28: Regional Solutions to Homeless Needs

The City shall continue to support regional solutions to homelessness through its participation in San Joaquin County's Continuum of Care strategy and collaboration with the Salvation Army. The City provides annual contributions to nonprofit organizations that assist in the implementation of the strategy. Programs and services under the Continuum of Care strategy include overnight shelter for individuals and families in immediate need of assistance, transitional shelter, rent assistance for homeless individuals and families ready to live in conventional housing, and supportive services to assist homeless individuals and families in making a successful transition from homelessness to independent living. Nonprofit organizations that provide services under the strategy include the Central Valley Low Income Housing Corporation (CVLIHC), Center for Positive Prevention Alternatives (CPPA), Gospel Center Rescue Mission, and New Directions.

Responsibility: Community Development Department, Planning Commission, City Council
Timeframe: Current and ongoing, 2003 – 2009; annual review of applications by nonprofit organizations for use of City's share of CDBG funds
Funding: CDBG
Objective: To provide regional solutions to homelessness through continuum of care strategy

Goal E: To encourage residential energy efficiency and reductions in residential energy use.

Program 29: Energy Efficiency and Weatherization Improvements for Older Homes

The City shall continue to permit energy conservation and weatherization improvements as eligible activities under the Lodi Housing Rehabilitation Program. The City will post and distribute information on currently available weatherization and energy conservation programs operated by the City, nonprofit organizations, and utility companies through the Lodi website, the Community Development Department public counter, the Lodi Public Library, the Loel Senior Center, and other public locations.

Responsibility: Community Development Department
Timeframe: Current and ongoing, 2003 – 2009
Funding: CDBG, HOME, public and private utilities, nonprofit organizations
Objective: To increase energy efficiency in older homes

Program 30: Energy Conservation for New Homes

The City shall enforce state requirements for energy conservation, including Title 24 of the California Code or Regulations (state building code standards), in new residential projects and encourage residential developers to employ additional energy conservation measures in the design of new residential developments with respect to the following:

- Siting of buildings
- Landscaping
- Solar access
- Subdivision design

Responsibility:	Community Development Department
Timeframe:	Current and ongoing, 2003 – 2009 as part of review of planning and building permit applications
Funding:	Permit fees
Objective:	To increase energy efficiency in the design and construction of new homes

D. Quantified Objectives

The City of Lodi has established quantified (numerical) objectives for several program categories to provide measurable standards for monitoring and evaluating program achievements. Quantified objectives have been established for accommodating the City's share of San Joaquin County's regional housing needs, new housing construction, housing rehabilitation, the preservation of existing affordable housing, and homebuyer assistance. The quantified objectives for the City's share of regional housing needs and housing construction differ because the housing construction objective is based on the City's estimate of the number homes that will actually be constructed and affordable to each income group. The regional housing needs objective addresses the City's ability to accommodate housing based on the availability of appropriately zoned vacant and underutilized land, with public services and facilities. These homes may or may not be built depending on market trends and the availability of funding assistance to developers of affordable housing. (Note: we need to try to use the same time period for the table below)

Table IV-2: Quantified Objectives: January 1, 2004 – June 30, 2009

Income	Accommodate Regional Share[1]	New Construction[2]	Homebuyer Assistance	Housing Rehab.[3]	Conservation of Affordable Housing	
					Rental Housing[4]	Mobilehomes[5]
Very Low	990	150	5		40	400
Low	664	150	25			
Moderate	738	400	25		--	
Above Moderate	1,622	2,250	--		--	--
Total	4,014	2,700	50		40	400

1. Quantified objectives are for the 2001 – 2009 San Joaquin County Housing Allocation Plan
2. Quantified objectives cover 2001 – 2009, based on anticipated market rate housing production (for moderate- and above moderate-income), availability of financial resources to assist in the construction of very low- and low- income housing, 25 non-rent restricted second units will be constructed that are affordable to low-income households, and five very low-income units constructed through nonprofit self-help programs
3. Based on historic rate of code enforcement and housing rehabilitation and anticipated availability of state and federal funding between 2003 and 2009
4. Based on the conservation of 40 existing subsidized rental housing units
5. Based on the number of mobilehomes in parks with 50 or more spaces; although the majority of mobilehome park residents are likely to have very low- or low-incomes, the City does not have specific information on the income levels of mobilehome park residents

APPENDIX A: 1993 HOUSING ELEMENT ACHIEVEMENTS

The success of the updated Housing Element is dependent to a great extent on a useful examination of the policies and implementation programs included in the previously adopted Housing Element. The evaluation identifies programs that have been successful in achieving housing objectives and addressing local needs, as well as programs that require modifications to address objectives in the updated Housing Element. State law [California Government Code section 65588 (a)] requires each jurisdiction review its housing element as frequently as appropriate to evaluate:

- The appropriateness of the housing goals, objectives, and policies in contributing to the attainment of the State housing goal;
- The effectiveness of the housing element in attainment of the community's housing goals and objectives; and,
- The progress of the jurisdiction in implementing the housing element.

According the California Department of Housing and Community Development (HCD), *Housing Element Questions and Answers: A Guide to the Preparation of Housing Elements*, the review is a three-step process:

- Review the results of the previous element's goals, objectives, policies, and programs. The results should be quantified where possible (e.g., the number of units rehabilitated), but may be qualitative where necessary (e.g., mitigation of governmental constraints).
- Compare what was projected or planned in the previous element to what was actually achieved. Analyze the significant differences between them. Determine where the previous housing element met, exceeded, or fell short of what was anticipated.
- Based on the above analysis, describe how the goals, objectives, policies and programs in the updated element are being changed or adjusted to incorporate what has been learned from the results of the previous element.

Summary of Achievements

Since the preparation of the previous Housing Element in 1993, 1,371 single-family detached homes, 16 duplex units, and 393 multi-family residential units were developed in the City. The average density of the single-family units was approximately 5 units per acre, the average density of the duplex units was approximately 10 units per acre, and the average density of the multi-family units was approximately 15 units per acre.

The City of Lodi Electric Utility implemented a rebate program used by many households in the City to make home improvements promoting energy efficiency. In addition, City standards for new development are geared toward energy efficiency. The City initiated a fair housing program, which is administered by the Community Improvement Manager, and provides solutions to complaints regarding fair housing.

The City has an ongoing relationship with the Salvation Army, Lodi's primary homeless shelter provider. The City assisted in the Salvation Army's recent warehouse conversion and relocation, which provided the organization with some needed additional space.

The following table summarizes the City's 1993 Housing Element programs and achievements.

Program Evaluation

Table A-1 summarizes achievements for each program in the 1993 Housing Element. The first column on the left contains the program statement, the middle column identifies the corresponding quantified goal for this program (if any), and the column on the right identifies achievements under each program.

Table A-1: Assessment of Implementation Programs

#	Program	Goal	Progress
1	The City shall revise the Zoning Ordinance to provide for a density bonus of at least 25 percent and at least one other concession or incentive, or provide other incentives of equivalent financial value for all residential projects that reserve at least 25 percent of its units for low- or moderate-income households, or at least 10 percent of its units for lower income households, or at least 50 percent for qualifying senior citizens. The City shall work with the San Joaquin County Housing Authority in developing procedures and guidelines for establishing income eligibility for the "reserved" units and for maintaining the "reserved" units as affordable units for at least 30 years. The City shall seek Housing Authority administration of the reserved units. The City shall establish a program to publicize the availability of the density bonus program and shall encourage prospective housing developers to use the program.	Target: 25-very-low-income; 20 low-income; and 30 moderate-income units.	A new and updated Development Code is under public review that reflects this goal of the City. Cooperation with other agencies is an on-going work item and directive of staff. There was little developer interest during the past Housing Element cycle in taking advantage of the State-required density bonus. No density bonus units were constructed. City policies, through both the Housing Element update and Development Code update, are being revised to induce higher density residential development.
2	The City shall prepare and maintain a current inventory of vacant, residentially zoned parcels and a list of approved residential projects, and shall make this information available to the public and developers. The City shall update the inventory and list at least annually.	None	Initial vacant lot inventory is complete and maintenance is an on-going directive of staff.
3	The City shall pursue all available and appropriate state and federal funding sources to support efforts to meet new construction and rehabilitation needs of low-and moderate-income households and to assist persons with rent payments required for existing units.	None	This will be an on-going work effort by the City Planner and Community Improvement Manager. The City has used State and federal funds in the past for housing projects, and is interested in pursuing available funding for affordable multi-family residential projects during this Housing Element cycle (See Goal A, Policy 6 and Program 5). Due to staff limitations, a focus on neighborhood improvement in the Eastside area, and constraints discussed in Chapter III (which the City has proposed to mitigate, only a small number of affordable housing units were constructed in Lodi during the 1990s by nonprofit organizations.

4	Pursue or promote the following programs for financing of housing projects: *Section 202 - Housing for the Elderly or Handicapped.* *Rental Housing Construction Program (RHCP).*	Target: 25 very-low-income units and 25 low-income units. Target: 30 very-low-income and 25 low-income units.	This is an on-going work effort by the City Planner and Community Improvement Manager. *No units were constructed under these programs* during the last Housing Element cycle due to staff limitations, a focus on neighborhood improvements, and constraints discussed in Chapter III (which the City proposes to mitigate). However, the City did assist the construction of 75 low- and very low-income senior housing units (Lodi House) through nearly $950,000 in CDBG and HOME funds.
4	The City shall use CDBG funds to subsidize onsite and offsite infrastructure improvements for lower-income housing projects.	None	No application for the use of CDGB funds for this purpose has been received. During the last Housing Element cycle, developers did not perceive a market for higher density or affordable housing development *in the City. The City is attempting to encourage such* development through various policy changes in the Housing Element update, as well as changes to the Development Code.
5	The City shall pursue available techniques, such as mortgage revenue bonds or other mortgage-backed securities, to develop affordable ownership and rental housing.	Target: 20 very-low-income and 20 low-income units.	The City is exploring community support for this program. None of these funding mechanisms was initiated during the last Housing Element cycle.
6	*The City shall amend the Zoning Ordinance to provide for the* development of manufactured and factory-built housing consistent with the requirements of state law.	None	A new and updated Development Code is under public review that reflects this program.
7	The City shall post and distribute information on currently available weatherization and energy conservation programs.	None	This program was initiated and is implemented by Lodi Electrical Utility. The City's Utility has assisted many City *households in making energy improvements through a* rebate program.
8	The City shall enforce state requirements, including Title 24 *requirements* for energy conservation, in new residential projects and encourage residential developers to employ	None	This ongoing program is implemented by Building Inspection Division and Planning Division.

	additional energy conservation measures with respect to the following: • Siting of buildings • Landscaping • Solar access • Subdivision design		The City of Lodi Electric Utility has implemented a rebate program to assist households in making home improvements that will promote energy efficiency. In addition, the City is committed to planting and preserving street trees and other development standards that promote energy conservation. The City continues its commitment to these issues through Programs 27 and 28 (see Housing Strategy).
9	The City shall continue to participate in San Joaquin County's CDBG Entitlement Program. Housing objectives shall be a high priority in the use of CDBG funds.	Target: 13 very-low-income and 13 low-income rehabilitated units.	Although it does not have precise records, the City's neighborhood improvement efforts, which include the use of CDBG funds and code enforcement activities, resulted in the improvement of nearly 300 dwelling units per year in 2001 and 2002.
10	The City shall amend its Zoning Ordinance and apply appropriate zoning designations to implement the land use densities provided for in the planned residential land use designation described in the Land Use Element.	None	A new and updated Development Code is under public review that reflects this program. The Zoning Ordinance was not updated since adoption of the last Housing Element, but is now being updated.
11	The City shall develop and implement standards applicable to all new residential projects aimed at improving the personal security of residents and discouraging criminal activity.	None	A new and updated Development Code is under public review that reflects this program (see also Program 3 of the current Housing Element).
12	The City shall continue to cooperate with the San Joaquin County Housing Authority in its administration of the Section 8 rental assistance program. Target: maintain at least 200 Section 8 certificates/vouchers for very-low income households.	None	The San Joaquin County Housing Authority administers the Housing Choice Voucher Program (formerly Section 8) for the City. According to Housing Authority Staff, 283 Lodi residents use the voucher program currently. The waiting list for the program closed in October of 2002 with more than 10,000 households on the Agency's waiting list.
13	The City shall establish policies and procedures for evaluating applications for demolition of residential structures. This evaluation shall consider the implications of the demolition with respect to the retention of affordable housing. If demolitions are deemed to result in a reduction of the amount of affordable housing in Lodi, the City shall require the proponent of the demolition to cooperate with	None	The City has not implemented this program. The City has not determined whether it would be able to enforce the specified requirements prior to proposed demolition projects and will need to review past demolition permits and conditions to determine the most appropriate policy/procedure to adopt.

	the City in providing relocation assistance to displaced residents and in determining the means for replacing demolished units.		
14	The City shall continue to promote equal housing opportunity for all persons regardless of race, religion, sex, marital status, ancestry, national origin, or color by continuing to provide funding for the operation of the City's Affirmative Fair Housing Program.	None	The City implemented its own fair housing program, which is administered by the Community Improvement Manager. Complaints are addressed as they arise. MR. HIGHTOWER IS ASKING THE COMMUNITY IMPROVEMENT MANAGER ABOUT THE FREQUENCY AND NATURE OF COMPLAINTS.
15	The City shall adopt an emergency shelter/transitional housing ordinance to clearly identify appropriate sites for such facilities and to make these sites readily accessible — for development through establishment of clear development guidelines. Until the adoption of such an ordinance, the City shall allow by right the development of such facilities in areas zoned C-M or C-2.	None	The right to develop these facilities within the C-M and C-2 zones continues to meet the needs of service providers. The City has an ongoing relationship with the Salvation Army, which is Lodi's primary homeless shelter provider. The City provided loans to the Salvation Army to assist relocation and warehouse conversion, providing a larger space just north of the downtown area. The former downtown site had limited space.
16	The City shall adopt a property maintenance ordinance.	None	The City adopted such an ordinance, which is implemented by the Community Improvement Division as part of an ongoing neighborhood code enforcement program.
17	The City shall implement a fair share monitoring program that tracks City progress toward contributing its fair share of the region's housing needs.	None	An initial system has been implemented and maintained by the Community Improvement Division. The City will initiate a land inventory geared toward tracking progress on Housing Element goals (Program 4).
18	The City shall pursue rehabilitation funds made available by Statewide Proposition 77 (June 1988).	Target: 13 very-low-income and 13 low-income rehabilitated units.	No units were rehabilitated under this program during the last Housing Element, but rehabilitation continues to be an important need in Lodi. The City will seek funding under available sources, such as the federal HOME Program or the state Multifamily Housing

			Program.
19	The City shall prepare and maintain a current inventory of residential units located in commercially or industrially-zoned areas. The City shall update the inventory and list at least annually.	None	Preparation of the Housing Element involved an inventory of land suitable for residential development. Ongoing inventory work will continue as a part of Program 4 of the Housing Element.

Draft
Environmental Impact Report

Lodi Housing Element Update

City of Lodi
California

Cotton/Bridges/Associates
A Division of P&D Consultants

Environmental Impact Report

City of Lodi

Housing Element Update

DRAFT

December 2003

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EXECUTIVE SUMMARY

Pursuant with State law, the City of Lodi (City) is updating the Housing Element of its General Plan. State law (Government Code Sections 65580 through 65589) mandates the contents of the Housing Element, which, at the most basic level include:

- An assessment of housing needs and an inventory of resources and constraints relevant to meeting those needs;
- A statement of the community's goals, quantified objectives, and policies relevant to the maintenance, improvement, and development of housing; and
- A program that sets forth a five-year schedule of actions that the local government is undertaking, or intends to undertake, to implement the policies and to achieve the goals and objectives of the Housing Element.

The housing program must also identify adequate residential sites available for a variety of housing types for all income levels; assist in developing adequate housing to meet the needs of low- and moderate-income households; address governmental constraints to housing maintenance, improvement, and development; conserve and improve the condition of the existing affordable housing stock; and promote housing opportunities for all persons.

This Environmental Impact Report (EIR) addresses the potential adverse physical environmental impacts of the Goals, Policies, and Programs included in the Housing Element Update, and where necessary, provides feasible mitigation measures to reduce those impacts.

Project Location

Lodi is located in the northern San Joaquin Valley, along the Mokelumne River and between State Route 99 and Interstate 5. The city is approximately 10 square miles in area, with a Sphere of Influence extending beyond the jurisdictional borders, as shown in Figure 1-1. The city is surrounded by agricultural land.

Project Objectives

The Lodi Housing Element is part of the City's General Plan, a comprehensive policy statement regarding the physical, economic, and social development of the City; the preservation and conservation of natural and human features of the landscape, and the redevelopment and re-use of land and buildings within the City. The Housing Element represents a critical link between land use and transportation policies, which define the location, layout, and movement of people and goods, and environmental/resource policies. Although housing represents a high priority, planning for housing must be balanced with the community's economic needs and environmental, resource, and open space protection policies, which are also essential aspects of the City's General Plan.

There are several goals for the Housing Element Update process, as summarized below:

1. Achieve certification by the California Housing and Community Development Department.
2. Meet Lodi's housing needs through 2008 without enlarging the city's General Plan boundaries.
3. Adhere to goals and policies of other adopted City plans, including the Downtown Revitalization Plan.
4. Ensure that the Update is consistent and complementary to existing programs identified in other General Plan Elements.
5. Ensure that new housing growth is managed in a responsible manner.

Project Characteristics

The Project consists of the following principal components:

Goals

The Goals of the Housing Element present a general statement of intent, or purpose, for both the Policies and the Programs identified in the Element. Goals represent the most general of the City's visions for the Housing Element, and were developed in close consultation with members of the community and appropriate service providers through workshops and public review and comment. Due to their general nature, changes to Housing Element Goals do not lend themselves to environmental analysis, though they do indicate the intent of the City in implementing Policy and Program changes, the impacts of which will be analyzed.

Policies

Policies are specific methods of implementing the Goals. The most important Policies for this EIR are those that would accommodate or require activities that would have physical environmental consequences.

Programs

Programs specify the methods and timelines for implementing Housing Element Goals and Policies. Typically, programs identify the specific department or division of the City charged with their implementation. Programs are directly tied to Housing Element Policies and designed to achieve the Goals through the management of land use and development, regulatory concessions or restrictions, and utilization of appropriate financing and subsidy programs.

Quantified Objectives

Quantified objectives are useful in implementing the Housing Element, tracking its implementation through annual Housing Element and General Plan reporting and assessment, and can be helpful in identifying the level of environmental impact of the Housing Element's Policies and Programs. While some Policies and Programs would be too general to precisely define likely environmental impacts, attaching quantified objectives allows a more precise assessment, and a more sophisticated form of environmental analysis.

Environmental Impact and Mitigation Measures

The City has directed the preparation of this EIR to analyze the potentially significant environmental impacts associated with the implementation of the updated Housing Element, and to identify mitigation measures capable of avoiding or substantially reducing the impacts. A summary of the potentially significant environmental impacts, mitigation measures, and level of impact remaining after mitigation is presented in Table E-1, Summary of Environmental Impacts and Mitigation Measures, which is located at the end of this Executive Summary.

The analysis contained in this EIR uses the words "significant" and "less than significant" in the discussion of impact. These words specifically define the degree of impact and coincide with language used in the CEQA Guidelines. As required by CEQA, mitigation measures have been included in this EIR to avoid or substantially reduce the level of impact. When certain impacts, even with the inclusion of mitigation measures cannot be reduced to a level below significance, they are identified as "significant and unavoidable impacts."

Significant and Unavoidable Impacts

CEQA defines a significant impact on the environment as "a substantial, or potentially substantial, adverse change in any of the physical conditions within an area affected by the project including land, air, water, flora, fauna, ambient noise, and objects of historic or aesthetic significance." In order to approve a project with an unavoidable significant impact, the lead agency (in this case, the City) must adopt a statement of overriding considerations (SOC). In adopting such a statement, the lead agency finds that it has reviewed the EIR, has balanced the benefits of the project against its unavoidable significant effects, and has concluded that the benefits of the project outweigh the unavoidable adverse environmental effects, and thus, the adverse environmental effects may be considered "acceptable" [CEQA Guidelines, Section 15093(a)].

The EIR identifies the following areas of significant impact which cannot be avoided by feasible mitigation measures implemented by the City:

- Exposure to, or creation of, carbon monoxide hotspots
- Consistency with land use policy, zoning, Williamson Act, conversion of agricultural land
- Adverse effect on scenic resources
- Adverse effect on roadway and intersection level of service
- Adverse impact to air quality attainment efforts

- Conversion of prime agricultural lands
- Loss of scenic resources
- Cumulative noise increase
- Adverse effect on intersection and roadway segment level of service
- Construction noise and vibration
- Exposure to existing sources of noise
- Traffic noise impact on surrounding land uses
- Increase in noise above ambient level

Potentially Significant Impacts that Can Be Mitigated

This EIR identifies the following areas of potentially significant impacts that can be mitigated to less-than-significant levels through the incorporation of mitigation measures identified in this EIR:

- Impact on known and undiscovered cultural resources
- Short-term construction related emissions
- Exposure to, or creation of, toxic emissions
- Safety issues associated with potentially hazardous sites
- Potential impact on water quality

Less than Significant Impacts

The analysis documented in this EIR concluded that the following project impacts will be less than significant or not significant because: (1) mitigating features are incorporated into the Project; (2) existing standard regulations that apply to Project development will mitigate the impact; (3) the level of impact will not exceed the identified thresholds of significance; (4) the impacts of the Project will be beneficial; or, (5) the impacts were fully addressed in previously certified environmental documents:

- Long-term operational emissions
- Consistency with air quality management plans
- Potential impact on sensitive biological habitats
- Impact on jurisdictional wetlands
- Potential for seismic effects
- Increased erosion potential
- Interference with potential mineral extraction
- Effects on public safety
- Exposure to flood hazards
- Increased runoff effects
- Creation of light spillage and glare
- Potential for growth inducement
- Potential fragmentation of development pattern
- Result in the need for expanded or new public facilities
- Effect on police and fire services and schools
- Demand for transit service

Alternatives to the Project

This EIR analyzes alternatives, including the "No Project" alternative required by CEQA. The analysis includes consideration of four alternatives, including the Increased Density Alternative, which is the most environmentally superior of the alternatives.

Alternatives Analyzed

- **Alternative 1: Southern Expansion Alternative**

  Assumes that infill residential and redevelopment are not feasible, and that residential needs will have to be met outside of existing developed areas. Infill residential along Cherokee Lane or in the industrial areas could have significant air quality, noise, traffic, and land use compatibility issues (because of higher intensity adjacent uses and higher traffic roadways), which could be mitigated by relocating growth to areas south of Harney Road.

- **Alternative 2: Increased Density Alternative**

  Reduces the amount of land required for residential development by increasing the minimum density in unmapped areas designated for residential development (this could be for single and/or multi-family areas). This could lessen air quality, noise, and other impacts associated with lower density development.

- **Alternative 3: Increased Infill Alternative**

  Identify different sites for infill residential, perhaps on parcels presently designated for commercial or institutional development. This may reduce some of the impacts listed in Alternative #1, and not require any additional urban expansion.

- **Alternative 4: No Project Alternative**

  If the Housing Element Update were not adopted, residential development would be expected to continue in a manner consistent with existing Housing Element and General Plan policies. It is expected that infill development would be less frequent in the No Project alternative, as this form of development has not occurred much in the city. In addition, the density of infill development that did occur would likely be lower than with the Project, as specific policies in the Update encourage development at the higher end of the allowable density range. Overall population and residential unit growth would be expected to be the same, although the reductions in infill development would likely force growth to the urban fringes along the southern and southwestern edges of the city.

Notice of Preparation and Responses

Through the Notice of Preparation (NOP) process, several environmental issues were raised, which are addressed in the EIR. Responses to the NOP are included in Appendix A along with the NOP form.

Mitigation Monitoring Program

In accordance with Section 21081.6 of CEQA, a mitigation monitoring program will be prepared for the proposed Project for adoption by the City prior to certification of the Final EIR. The mitigation monitoring program will be designed to ensure compliance with adopted mitigation measures contained in the Final EIR.

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

TOPIC/IMPACT NUMBER	IMPACT DESCRIPTION	SIGNIFICANCE	MITIGATION MEASURE	RESIDUAL SIGNIFICANCE
Air Quality				
Impact AQ-1	Short-Term Construction Related Emissions	Potentially significant	**MM AQ-1**	Less than significant
Impact AQ-2	Exposure to, or Creation of, Toxic Emissions	Potentially significant	**MM AQ-2**	Less than significant
Impact AQ-3	Long-Term Operational Emissions	Less than significant	None required	Less than significant
Impact AQ-4	Exposure to, or Creation of, Carbon Monoxide Hotspots	Potentially significant	None available	Significant and unavoidable
Impact AQ-5	Consistency with Air Quality Management Plans	Less than significant	None required	Less than significant
Biological Resources				
Impact BIO-1	Potential Impact on Sensitive Biological Habitats	Less than significant	None required	Less than significant
Impact BIO-2	Impact on Jurisdictional Wetlands	Less than significant	None required	Less than significant
Cultural and Historic Resources				
Impact C/HR-1	Impact on Known and Undiscovered Cultural Resources	Potentially significant	**MM-C/HR-1** **MM-C/HR-2**	Less than significant
Geology, Soils, and Mineral Resources				
Impact GEO-1	Potential for Seismic Effects	Less than significant	None required	Less than significant
Impact GEO-2	Increased Erosion Potential	Less than significant	None required	Less than significant
Impact GEO-3	Interference with Potential Mineral Extraction	Less than significant	None required	Less than significant
Health and Safety				
Impact HS-1	Effects on Public Safety	Less than significant	None required	Less than significant

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

TOPIC/IMPACT NUMBER	IMPACT DESCRIPTION	SIGNIFICANCE	MITIGATION MEASURE	RESIDUAL SIGNIFICANCE
Impact HS-2	Safety Issues Associated with Potentially Hazardous Sites	Potentially significant	**MM-HS-1**	Less than significant
Hydrology and Water Quality				
Impact HYDRO-1	Potential Impact on Water Quality	Potentially significant	**MM-HYDRO-1**	
Impact HYDRO-2	Exposure to Flood Hazards	Less than significant	None required	Less than significant
Impact HYDRO-3	Increased Runoff Effects	Less than significant	None required	Less than significant
Land Use Planning, Agricultural and Visual Resources				
Impact LU-1	Consistency with Land Use Policy, Zoning, Williamson Act, Conversion of Agricultural Land	Potentially significant	None available	Significant and unavoidable
Impact LU-2	Adverse Effect on Scenic Resources	Potentially significant	None available	Significant and unavoidable
Impact LU-3	Creation of Light Spillage and Glare	Less than significant	None required	Less than significant
Noise				
Impact N-1	Construction Noise and Vibration	Potentially significant	None available	Significant and unavoidable
Impact N-2	Exposure to Existing Sources of Noise	Potentially significant	None available	Significant and unavoidable
Impact N-3	Traffic Noise Impact on Surrounding Land Uses	Potentially significant	None available	Significant and unavoidable
Impact N-4	Increase in Noise above Ambient Level	Potentially significant	None available	Significant and unavoidable
Population and Housing				
Impact PH-1	Potential for Growth Inducement	Less than significant	None required	Less than significant
Impact PH-2	Potential Fragmentation of Development Pattern	No impact	None required	No impact

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

TOPIC/IMPACT NUMBER	IMPACT DESCRIPTION	SIGNIFICANCE	MITIGATION MEASURE	RESIDUAL SIGNIFICANCE
Public Facilities and Services				
Impact PFS-1	Result in the Need for Expanded or New Public Facilities	Less than significant	None required	Less than significant
Impact PFS-2	Effect on Police and Fire Services and Schools	Less than significant	None required	Less than significant
Transportation				
Impact TC-1	Adverse Effect on Roadway and Intersection Level of Service	Potentially significant	None available	Significant and unavoidable
Impact TC-2	Demand for Transit Service	Less than significant	None required	Less than significant
Cumulative and Long-Term Impacts				
Cumulative: Air Quality Impact	Carbon monoxide hot spots	Potentially significant	None available	Significant and unavoidable
	Adverse impact to air quality attainment efforts	Potentially significant	None available	Significant and unavoidable
Cumulative: Land Use Planning, Agricultural Resources, and Visual Resources Impact	Conversion of prime agricultural lands	Potentially significant	None available	Significant and unavoidable
	Loss of scenic resources	Potentially significant	None available	Significant and unavoidable
Cumulative: Noise Impact	Cumulative noise increase	Potentially significant	None available	Significant and unavoidable
Cumulative: Transportation Impact	Adverse effect on intersection and roadway segment level of service	Potentially significant	None available	Significant and unavoidable

1.0 Introduction

Purpose of the Draft EIR

This Draft Environmental Impact Report (DEIR) has been prepared by the City of Lodi (City), in accordance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines. As provided in Section 15121(a) of the Guidelines, this Draft EIR is intended to serve as an informational document that will:

> ...inform public agency decision makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project...

Section 15378 of the CEQA Guidelines defines a "project" as the whole of an action, which may be subject to several discretionary approvals, and which has the potential to result in an adverse physical change in the environment, directly or indirectly. The Project analyzed in this Draft EIR is described in full in Section 2 of this document.

Prior to approving the proposed Project, findings must be made pursuant to Section 15091 of the CEQA Guidelines. This section mandates that one or more of the following findings must be made for each significant environmental effect identified through the Draft EIR process:

- Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.
- Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted.
- Specific economic, social, or other considerations make infeasible the mitigation measures or project alternatives identified in the EIR.

In addition, Section 15093 of the Guidelines requires that the decision makers balance the benefits of a proposed project against any unavoidable environmental effects which would result from the implementation of the project. If the benefits of the project outweigh the unavoidable adverse effects, then the environmental effects may be considered acceptable and a statement of overriding considerations (SOC) adopted.

The Guidelines stipulate that EIRs should be prepared as early as feasible in the planning process to enable environmental considerations to influence project design (Section 15004) and that, to the extent possible, the EIR process should be combined with the existing planning, review, and project approval process used by each public agency (Section 15080). Consequently, this Draft EIR is to be completed prior to formal consideration by the City of the Housing Element update to ensure an opportunity to develop measures which would minimize the potential adverse environmental effects associated with the Project.

In accordance with State law, the EIR is subject to a public review and comment period, beginning with the circulation of the document to all responsible, trustee, and other interested State, federal, and local agencies. Availability of the EIR and the specified review period is publicly noticed in the manner prescribed by law to afford general knowledge of the review process and access to the environmental document. Written comments on environmental aspects of a project are submitted to the lead agency during this review period, which allows the public and interested agencies the opportunity to participate in the environmental review process.

Following the review period, any comment received will be evaluated, and a written response is prepared. These comments and responses are incorporated into the Final EIR, along with a list of all persons, organizations, and agencies commenting on the Draft EIR. The City may then certify that the EIR has been completed in compliance with CEQA and that the information contained in the EIR has been reviewed and considered prior to making a decision on the Project. Along with CEQA findings, if mitigation measures are included in the EIR, the lead agency adopts a mitigation monitoring and reporting program. This program is required by law to ensure that mitigation measures determined to be necessary and feasible by the lead agency are implemented. Adoption of a mitigation monitoring and reporting program is independent of the EIR certification process.

Scope and Methodology

City staff determined that implementation of the Housing Element update could have a significant effect on the environment, thus, requiring an EIR. The following are the environmental topic areas that receive full analysis in this EIR:

- Air quality
- Biological resources
- Cultural and historic resources
- Geology, soils, and mineral resources
- Health and safety
- Hydrology and water quality
- Land use planning, agricultural and visual resources
- Noise
- Population and housing
- Public facilities and services
- Transportation

This document is a Program EIR prepared pursuant to the provisions of Section 15168 of the CEQA Guidelines. A Program EIR is an EIR prepared on a series of actions such as those that may be anticipated as a result of the update of the Housing Element.

A Program EIR allows later activities, for example, a subsequent project, to be approved provided that the effects of such project were examined in the Program EIR, and no new effect could occur or no new mitigation measure would be required upon implementation of such subsequent project. At the time of proposed construction of each Housing Element related activity, the City will review each individual project to determine whether the Program EIR fully addressed potential impacts and identified appropriate mitigation measures of the project. If so, no further CEQA environmental

review would be required.

On October 20, 2003, a Notice of Preparation (NOP) with a Project Description was filed with the State Clearinghouse and distributed to various Responsible and Trustee agencies. A copy of the Notice of Preparation (NOP) is contained in the Appendix A of this document. Written responses to the NOP are also contained in Appendix A, as is the list of Responsible and Trustee agencies to which these documents were sent.

This EIR analyzes the potential effects of the Housing Element, including Project components such as:

- Updated Housing Element Goals, Policies, and Programs;
- General Plan land use designation changes and rezoning, if any, required by the Housing Element;
- Increases in density or intensity of use accommodated or facilitated by the Housing Element and,
- Reasonably foreseeable changes in level, character, and location of development resulting from any alteration to the City's growth management ordinance.

The Draft EIR addresses the reasonably foreseeable effects of the Housing Element, as well as the cumulative and growth-inducing effects implementation of the Housing Element may have upon the local and regional environment.

Following is a summary description of the environmental topics addressed in this Draft EIR, based on the requirements of CEQA and comments received in response to the NOP.

Air Quality. This section addresses the incremental and cumulative effect the Project will have on the air quality of the Project vicinity, San Joaquin County, and the San Joaquin Valley Air Basin.

Biological Resources. This section addresses the impacts on the diversity and number of plant and animal species that may be present in the city, threatened and endangered plants and wildlife, new species introduction, jurisdictional wetlands, and habitat deterioration.

Cultural and Historic Resources. This section addresses the impacts of the Housing Element on recognized known and unknown cultural resources, including paleontological and historic resources.

Geology, Soils, and Mineral Resources. This section addresses impacts associated with site development, including changes in topography, soil erosion, geologic and seismic hazards, and loss of significant mineral resources.

Health and Safety. This section addresses impacts associated with potential contamination and release of hazardous substances, and Project impacts on risk to public safety.

Hydrology and Water Quality. This section addresses Project impacts related to changes to the hydrological structure, alteration of drainage patterns, depletion of groundwater supplies, degradation of water quality or substantial increase in stormwater quantity, and exposure to flood hazard.

Land Use Planning, Agricultural and Visual Resources. This section addresses inconsistencies with land use planning and other City policies designed to reduce environmental impacts. Also included is an assessment of the Housing Element's impact to neighborhood continuity and character, as well as disclosure of impacts to scenic views and important agricultural resources.

Noise. This section addresses noise generated by activities encouraged, required, or accommodated by the Housing Element.

Population and Housing. This section examines Housing Element impacts resulting from population growth, displacement of people or housing, conflict with housing or population policies, and changes to the city's jobs-to-housing relationship.

Public Facilities and Services. This section addresses demands on public services and facilities imposed by implementation of the Housing Element, including impacts to water service, sewer service, police service, fire protection, public schools, parks and recreation, and solid waste.

Transportation. Addresses direct and cumulative effects of the Housing Element on the roadway system, vehicular circulation, parking, transit, and pedestrian circulation.

Alternatives. This section provides an analysis of viable alternatives to the proposed Housing Element, as prescribed in Section 15126.6(a) of the CEQA Guidelines and recent case law.

Cumulative and Long-Term Impacts. Provides an analysis of potential irreversible changes that would occur as a result of the Project, as required by Section 15126(c) of the CEQA Guidelines.

Previous and Concurrent Environmental Analysis

Existing environmental analysis of the impacts of the City's General Plan and Redevelopment Plan provide background and mitigation measures useful to examination of the impacts of the Housing Element. An EIR for the Lodi General Plan was completed in 1991 and a 2002 EIR addressed the impacts of adoption and implementation of the Lodi Redevelopment Plan by the Lodi Redevelopment Agency. Other environmental documents prepared recently addressing projects in Lodi are referenced where they apply to specific aspects of the Project.

Required Actions

As defined by CEQA, the City of Lodi is the Lead Agency for this Project. The Lodi City Council is responsible for the environmental determination and final action on the Project.

Initially, City action on this EIR will be necessary to adopt the Housing Element. Subsequent to City action, other agencies may consider actions, permits, and approvals that may be necessary prior to development and implementation of future projects associated with the updated Housing Element. This Draft EIR may be used for evaluation of such subsequent actions. Projects implemented under

the Housing Element may not be addressed in this EIR at a level of detail to avoid additional project-level consideration of impacts under CEQA. However, this EIR is structured to assess environmental impacts in as much detail for as many aspects of Housing Element implementation as possible. The City and other lead agencies with projects in Lodi will make a determination as to whether further CEQA analysis is required when future housing projects or other related projects are proposed.

2.0 Project Information

Project Location

Lodi is located in the northern San Joaquin Valley, along the Mokelumne River and between State Route 99 and Interstate 5. The city is approximately 10 square miles in area, with a Sphere of Influence that extends beyond the jurisdictional borders (Figures 2-1 and 2-2). The Project area includes the entire city limits and areas in the City's Sphere of Influence.

Project Objectives

There are several goals for the Housing Element Update process, as summarized below:

1. Achieve certification by the California Housing and Community Development Department.
2. Meet Lodi's housing needs through 2008 without enlarging the city's General Plan boundaries.
3. Adhere to goals and policies of other adopted City plans, including the Downtown Revitalization Plan.
4. Ensure that the Update is consistent and complementary to existing programs identified in other General Plan Elements.
5. Ensure that new housing growth is managed in a responsible manner.

Project Characteristics

The Project analyzed in this Program EIR is the Draft 2003-2008 Housing Element of the Lodi General Plan, which is an update of the Housing Element that was adopted in 1991. The Draft 2003-2008 Housing Element Update is hereby incorporated by reference in this Project description and consists of the principal components described below.

Goals

The Goals of the Housing Element present a general statement of intent, or purpose, for both the Policies and the Programs identified in the Element. Goals represent the most general of the City's visions for the Housing Element, and were developed in close consultation with members of the community and appropriate service providers through workshops and public review and comment. Due to their general nature, changes to Housing Element Goals do not lend themselves to environmental analysis, though they do indicate the intent of the City in implementing Policy and Program changes, the impacts of which will be analyzed.

Policies

Policies are specific methods of implementing the Goals. The most important Policies for this EIR are those that would accommodate or require activities that would have physical environmental consequences.

Programs

Programs specify the methods and timelines for implementing Housing Element Goals and Policies. Typically, programs identify the specific department or division of the City charged with their implementation. Programs are directly tied to Housing Element Policies and designed to achieve the Goals through the management of land use and development, regulatory concessions or restrictions, and utilization of appropriate financing and subsidy programs.

Quantified Objectives

Quantified objectives are useful in implementing the Housing Element, tracking its implementation through annual Housing Element and General Plan reporting and assessment, and can be helpful in identifying the level of environmental impact of the Housing Element's Policies and Programs. While some Policies and Programs would be too general to precisely define likely environmental impacts, attaching quantified objectives allows a more precise assessment, and a more sophisticated form of environmental analysis.

Figure 2-2
Lodi City Limits

Description of Proposed Project

Due to the unique nature of the Housing Element, particularly the fact that many of the components of the Element involve programs whose operation are not expected to result in potential environmental effects, the approach to the environmental analysis requires particular attention.

This section identifies those components of the Housing Element Update that have been determined to have potentially significant environmental effects. As previously noted, while the Housing Element Update in its entirety is the Project, for the purpose of environmental analysis the components described in this section – extracted from Section IV Strategy, Subsection B (Goals and Policies), and Section C (Implementation Programs) - constitute the Project that is the subject of this Program EIR. These changes are the basis for the environmental analysis contained in Sections 3.0 through 3.12 of this Program EIR.

The numbers assigned to Housing Element Goals and Policies are as described in the Housing Element Update.

Goals and Policies

GOAL A: **To provide a range of housing types and densities for all economic segments of the community while emphasizing high quality development, homeownership opportunities, and the efficient use of land.**

Policies

1. The City shall promote the development of a broad mix of housing types through the following mix of residential land uses: 65 percent low density, 10 percent medium density, and 25 percent high density.

2. The City shall regulate the number of housing units approved each year to maintain a population-based annual residential growth rate of 2.0 percent, consistent with the recommendations of the Mayor's Task Force and the growth management ordinance.

3. The City shall continue to exempt senior citizen housing projects from the growth management ordinance.

4. The City shall exempt very low- and/or low-income housing units from the growth management ordinance.

5. The City shall maintain and regularly update its land use database to monitor vacant residential land supply.

6. The City shall pursue available and appropriate state and federal funding programs and collaborate with nonprofit organizations to develop affordable housing.

7. The City shall promote the expeditious processing and approval of residential projects that conform to General Plan policies and City regulatory requirements.

8. The City shall seek to reduce the cost impact of its policies, regulations, and permit procedures on the production of housing, while assuring the attainment of other City objectives.

9. The City shall grant density bonuses of at least 25 percent and/or other incentives in compliance with state law for projects that contain a minimum specified percentage of very low-income, low-income, ~~or~~ qualifying senior housing units or units designed to facilitate individuals with physical challenged.

10. The City shall seek to intersperse very low- and low-income housing units within new residential developments and shall ensure that such housing is visually indistinguishable from market-rate units.

11. The City shall continue to allow and encourage the development of a variety of housing and shelter alternatives, both renter and owner, to meet the diverse needs of the City's population.

12. The City shall promote the development of senior and other special needs housing near, and/or with convenient public transportation access to, neighborhood centers, governmental services, and commercial service centers.

13. The City shall encourage infill residential development and higher residential densities within the existing City limits near transit stops, and compact development patterns in annexation areas to reduce public facility and service costs, avoid the premature conversion of natural resource and agricultural lands, and reduce the number of trips from private vehicles.

Program 1: Zoning Ordinance Revisions

The City shall revise Title 17 of the Lodi Municipal Code (Zoning Ordinance) to reduce barriers to, and provide incentives for, the construction and conservation of a variety of housing types. Revisions to Title 17 will include the following:

a. The addition of a chapter that provides for density bonuses and other incentives for projects that include ten percent very low-income housing, 20 percent low-income housing, 50 percent qualifying senior housing, or 20 percent moderate-income hosing in condominium conversion projects, in compliance with Sections 65915 – 65918 of the California Government Code. The City shall work with the San Joaquin County Housing Authority in developing procedures and guidelines for establishing income eligibility for the "reserved" units and for maintaining the "reserved" units as affordable units for at least 30 years. The City shall seek Housing Authority administration of the reserved units. The City shall establish a program to publicize the availability of the density bonus program through the City's website, program information at the Community Development Department public counter, and pre-development meetings with housing providers (such as the housing unit allocation stage). The City shall encourage prospective housing developers to use the density bonus program at pre-development meetings. In conjunction with density bonuses, the City will offer one or more regulatory incentives, as needed and appropriate, such as:

- Reduced parking for projects oriented to special needs groups and/or located close to public transportation and commercial services;
- Expedited permit processing; or
- Deferral of fees for an appropriate time period to allow for the project to begin generating income.

b. Conformance with California Government Code sections 65852.3 and 65852.7, which require that manufactured homes in single-family zones on permanent foundations be permitted under the same standards as site-built homes (with limited exceptions) and that mobilehome parks be permitted in any residential zone (although the City may require a use permit).

c. Addition of standards for emergency shelters and transitional housing to clearly identify appropriate zoning districts and locations for such facilities and to make these sites readily accessible. Until the adoption of such revisions to the Zoning Ordinance, the City will continue to allow by right the development of such facilities in areas zoned C-M or C-2.

d. Addition of a definition of farmworker housing that does not conflict with state law definitions for employees housing (beginning with California Government Section 17000) and specification of the zoning districts and standards under which such housing will be permitted.

e. Clarification of standards for permitting residential care facilities (such as group homes). The City will specify that all such facilities with six or fewer residents are permitted in residential zoning districts. The City will also designated zoning districts in which facilities of seven or more persons will be permitted through a use permit and standards for such facilities.

f. Revision of off-street parking requirements (Chapter 17.60) to allow for less than two spaces per multifamily dwelling unit with fewer than two bedrooms when justified due to the characteristics of the occupants (such as seniors, persons with disabilities, or low-income single working adults) and/or the project location (such as along a public transit route or in the downtown area).

g. Revision of standards for second dwelling units to allow the conversion of accessory buildings to second units subject to compliance with all other zoning and parking standards, an appropriate minimum lot size for detached second units, and architectural compatibility with the main dwelling unit. The City will permit second dwelling units through an administrative permit process in compliance with state law (California Government Code section 65852.2).

h. Elimination of single-family homes as permitted uses in the R-GA, R-MD, R-HD, and R-C-P zones, except on parcels constrained by lot size, environmental, or other factors that would make the construction of multifamily housing infeasible.

i. Reduction in the number of non-residential uses permitted in multifamily residential zones to public and quasi-public uses and supportive services for multifamily residents.

Responsibility: Community Development Department, Planning Commission, City Council
Timeframe: Complete zoning code amendments as part of a new unified development code by June 2004.

Funding: General Fund
Objective: *Reduce regulatory barriers to the provision of housing*

Program 2: Revise Growth Management Program

The City will revise its growth management program to exempt housing units affordable to very low- or low-income households with long-term affordability restrictions.

Responsibility: Community Development Department
Timeframe: Begin second round of allocations, if needed, in 2005 and annually thereafter
Funding: Application fees
Objective: Expedite the residential development approval process

Program 3: Personal Security Standards

The City will continue to implement design standards applicable to all new residential projects with the objective of improving the personal security of residents and discouraging criminal activity. Design standards will address issues such as the placement of landscaping, accessory buildings, and accessory structures in a manner that does not impede the City's ability to conduct neighborhood police patrols and observe potential criminal activity; lighting and other security measures for residents, and the use of materials that facilitate the removal of graffiti and/or increase resistance to vandalism.

Responsibility: Community Development Department
Timeframe: Current and ongoing, 2003 - 2009
Funding: Permit fees
Objective: Reduce the susceptibility of residential properties and neighborhoods to criminal activity and increase residents' perception of personal safety

Program 4: Land Inventory

The City shall prepare and maintain a current inventory of vacant, residentially zoned parcels and a list of approved residential projects, and shall make this information available to the public and developers, including information on underutilized sites within the downtown area with residential or mixed-use development potential. The City shall update the inventory and list at least annually. The City will promote the land inventory and the availability of each update through the City's web site, a notice at the Community Development Permit Counter, and a press release subsequent to each update.

To encourage the maximum efficient use of land within the current City limits, Lodi will also conduct a study of residential development potential on underutilized industrial and commercial sites along Cherokee Lane, South Sacramento Street, South Stockton Street, and West Kettleman Lane. Properties along these corridors may be suitable for future residential development if sufficient land can be consolidated to make such development feasible (see Figures 2-3 through 2-5, which follow). These areas are characterized by obsolete patterns of land development, older structures in

substandard condition, odd-sized lots, and marginally viable commercial and industrial uses that would make properties ripe for redevelopment in the next five to ten years. If Lodi determines that residential development is feasible along these streets, the City will initiate a planning process with property owners (which may be a special area plan or a specific plan meeting state law requirements) to define specific properties suitable for residential or mixed-use development, appropriate development standards, and improvements needed to support residential development.

Responsibility:	Community Development Department, Planning Commission, City Council
Timeframe:	Complete study of residential development potential by December 2006; prepare and adopt area plan(s) by December 2009.
Funding:	General Fund, contributions from property owners
Objective:	Increase the potential for infill development, thereby reducing the need to prematurely annex land and convert agricultural land to urban use

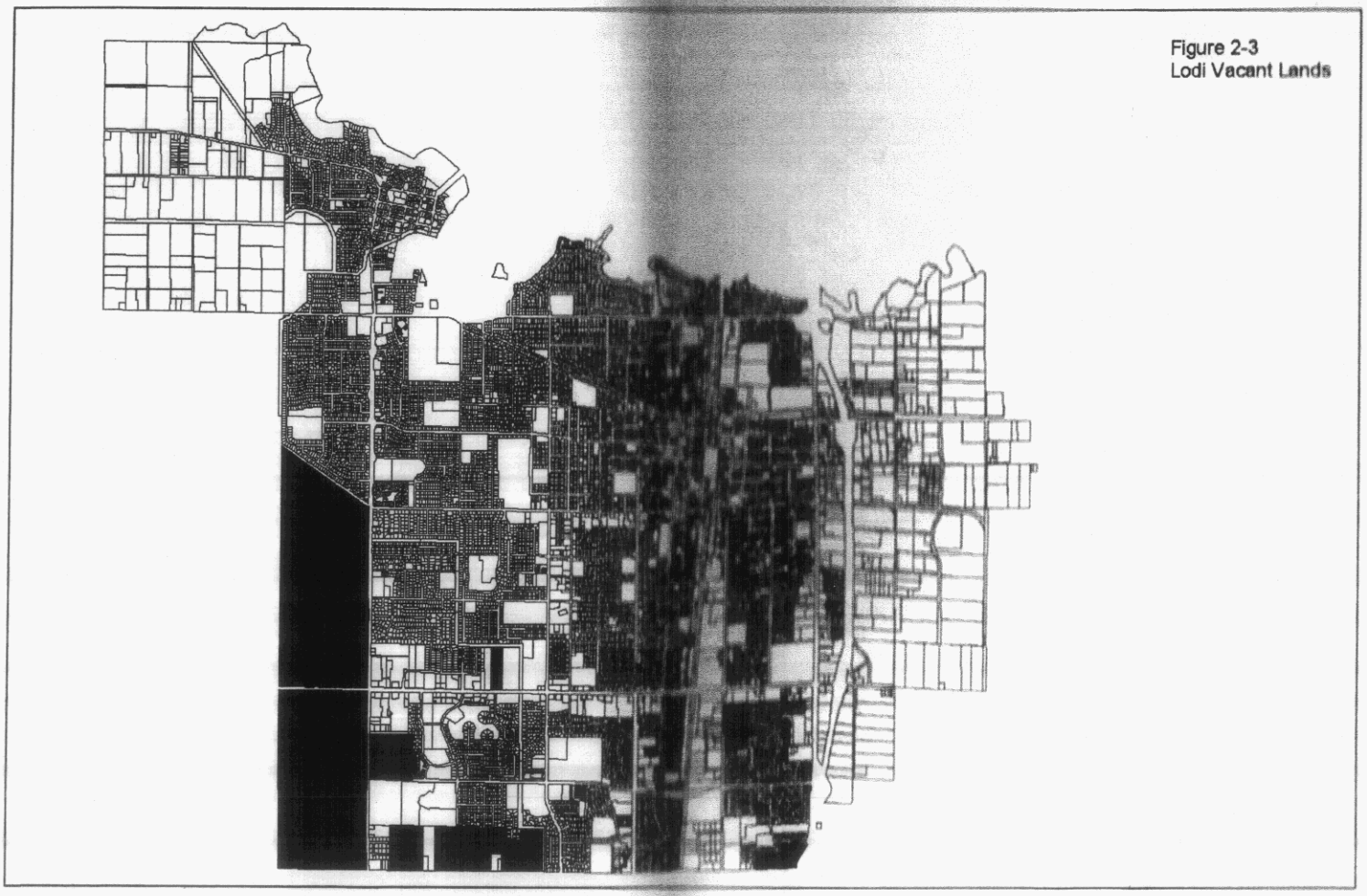

Figure 2-3
Lodi Vacant Lands

Figure 2-3
Lodi Vacant Lands

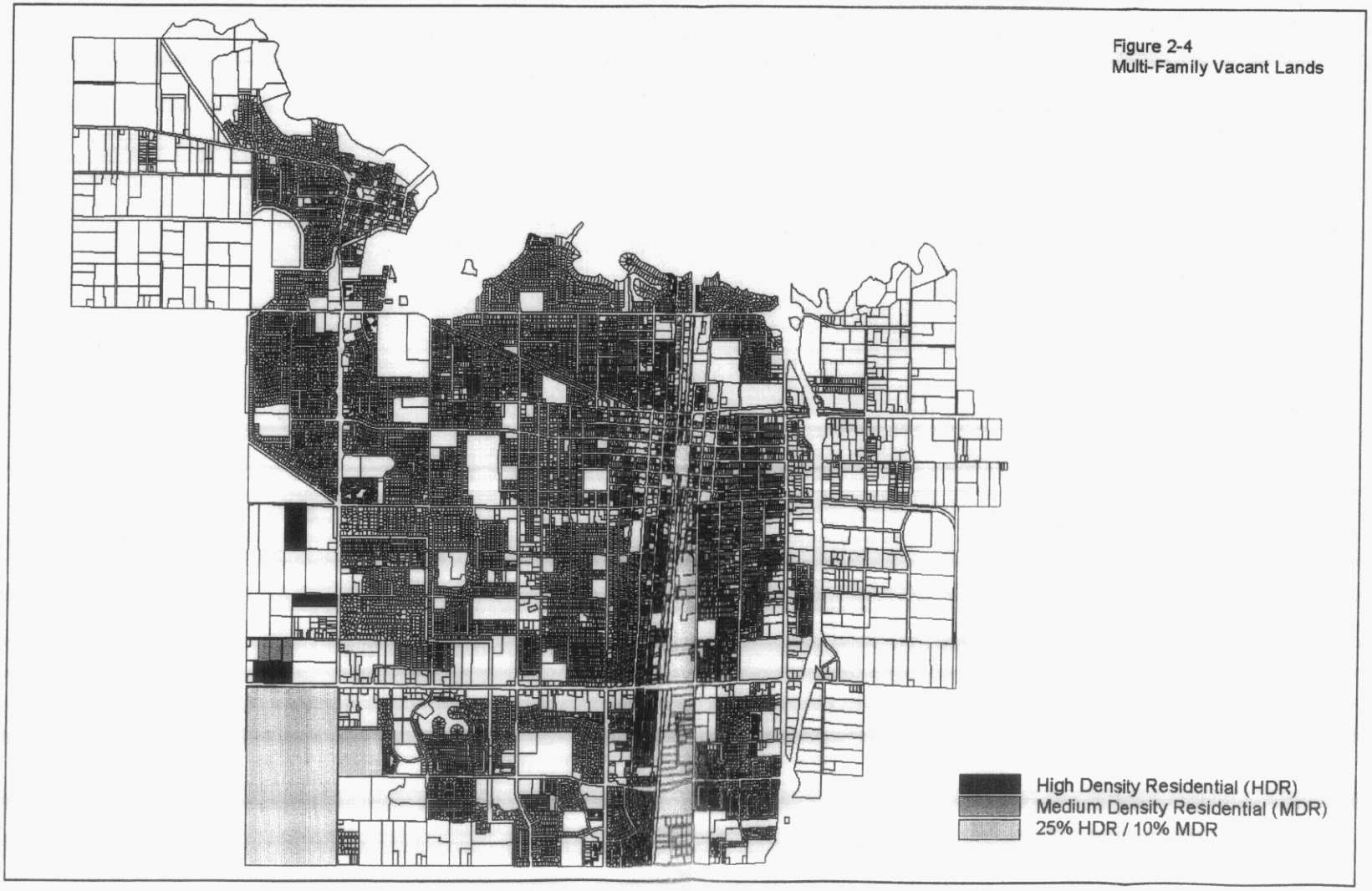

Figure 2-4
Multi-Family Vacant Lands

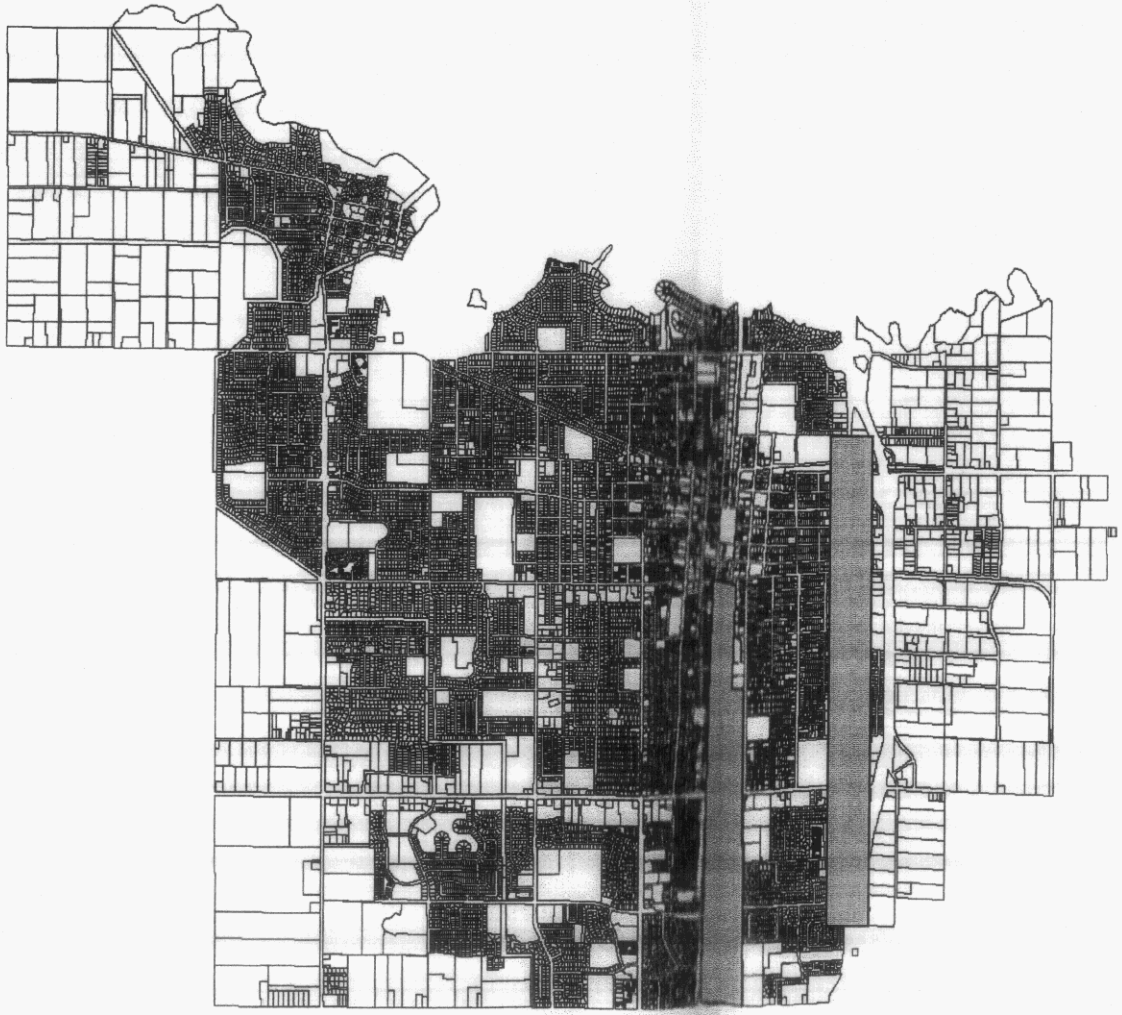

Figure 2-5
Areas with Reuse / Infill Potential

Program 5: Pursuit of State and Federal Funds in Support of Housing Construction

The City shall pursue available and appropriate state and federal funding sources to support efforts to construct housing meetings the needs of low-and moderate-income households, to assist persons with rent payments required for existing housing units, to provide supportive services, and to provide on- and off-site improvements and public facilities, in support of affordable housing projects. The City will take the following actions in pursuit of state and federal funding:

a. Meet annually with private nonprofit and for-profit affordable housing providers and public agencies that are interested in constructing affordable housing, providing special needs housing or shelter, and/or providing supportive services for low-income and special needs residents. The purpose of the annual meetings will be to discuss priorities for lending City support for funding requests for affordable housing projects and programs during the subsequent 12 to 24 months. The City will promote these annual meetings through direct notices to private and public entities that have provided housing or supportive services in Lodi, or that expressed an interest in doing so, in the past.

b. Provide support to other entities (nonprofit organizations, for-profit affordable housing providers, and public agencies) that apply directly for state or federal funds. Examples of support to be provided by the City include: 1) expedited processing of planning permits that are needed before an applicant can submit a state or federal funding request or receive funds; 2) providing information to complete a funding request (such as demographic, housing, or economic statistics in support of an application); and 3) letters of support for projects or programs that the City has approved (including preliminary or conceptual approval).

c. Apply directly for state and federal funding under programs in which the City must be the applicant. The City will directly apply for funding only when there is no feasible alternative. Given limitations on City staff expertise and availability, the preferred method of accessing state and federal funding will be actions 7(a) and 7(b).

In pursuing state and federal funding, and working with other private and public entities to provide affordable housing, the City will seek to increase the availability of housing and supportive services to the most vulnerable population groups and those with the greatest unmet needs, such as very low-income and frail seniors, persons with disabilities who cannot live independently, farmworkers and their families, low-income large families, and single-parent households, particularly those with small children.

Responsibility:	Community Development Department
Timeframe:	For action 7(a), annual meetings, 2003 – 2009; for action 7(b), quarterly each year, depending on funding deadlines for specific state and federal programs, 2003 – 2009; for action 7(c) semi-annual review and assessment of funding opportunities based on: 1) funding cycles and eligible activities for various state and federal programs, 2) projects and programs proposed to the City for state or federal funding, and 3) City staff capacity to prepare funding requests
Funding:	California Multifamily Housing Program California Housing Finance Agency (HELP Program) Low-Income Housing Tax Credits (state & federal)

	CalHome Program Federal Home Loan Bank – Affordable Housing Program Enterprise Foundation Special Housing Needs and Supportive Services, Federal Department of Housing and Urban Development Programs – Section 221(d), Section 202 (elderly), Section 811 (persons with disabilities) Child Care Facilities Finance Program (administered through the State of California)
Objective:	150 very Low-income housing units 100 low-income housing units

Program 6: Encourage Efficient Use of Land for Residential Development

The City will investigate incentive and regulatory tools to encourage efficient use of land designated or held in reserve for urban development within the existing Lodi Sphere of Influence to reduce the premature conversion of agricultural land to urban use. If determined to be feasible, the City will adopt one or more incentives or regulations. Examples of approaches the City will study and consider are:

- A requirement to mitigate the loss of Prime Farmland through the payment of a fee. Fees collected by the City will be used to foster agricultural production in the Lodi area. This program may fund marketing, research, land acquisition and other programs necessary to promote agricultural production. An option that the City may consider to promote the production of affordable housing is to have this program tied to a sliding scale based on dwelling units per acre. If a development is at the Land Use Element mandated 65% Low Density/10% Medium Density/35% High Density, equivalent to 9.85 dwelling units per acre, then no fee would be collected, a higher density would be provided with a credit while a lower density would be subject to the fee.

- The use of transferred development rights (TDRs) that can be applied to designated areas within the Sphere of Influence. The TDRs might be combined with a density bonus program for agricultural preservation to increase the number of opportunities to use the TDRs. An option that the City of Lodi may consider is to designate sending and receiving areas. A potential sending area for the program could be approximately 0.25 miles south of Harney Lane to Armstrong Road in the area currently designated as Planned Residential Reserve by the Land Use Element of the General Plan. The receiving area for this program could then be designated to areas north of Harney Lane in the Planned Residential portion of the General Plan.

- The use of transitional land use categories, such as residential estates, to provide a further buffer between more intense urban land uses and agricultural land uses.

Responsibility:	Community Development Department, Planning Commission, City Council,
Timeframe:	Complete study and recommend incentives and regulations by June 2005; City Council to adopt incentives or regulations by December 2005.
Funding:	General Fund
Objective:	Preserve agricultural land and reduce the amount of land needed to meet future urban growth needs

Program 7: Rental Assistance

The City shall continue to support the San Joaquin County Housing Authority in its administration of the Housing Choice Voucher rental assistance program (formerly called Section 8 Program). The City's support will include distribution of program information at the Community Development public counter, distribution of program information to rental property owners as part of the City's code enforcement activities, creation and maintenance of a link to the Housing Authority's website on the City's web site, and annual meetings with representatives of the Housing Authority to discuss actions the City can take to encourage greater participation in the Voucher Program by rental property owners.

Responsibility:	Community Development Department
Timeframe:	Distribution of Housing Choice Voucher Program information, current and ongoing, 2003 - 2009; create website link to Housing Authority website by March 2004, maintain link thereafter, 2003 - 2009.
Funding:	General Fund
Objective:	Increase rental property owner awareness of, and participation in, rental assistance programs

Program 8: Neighborhood Improvement

The City will continue to designate a staff position, Community Improvement Manager (CIM), within the Community Development Department to focus on the implementation of housing and neighborhood improvement programs. Among the duties of the CIM are to:

- Enforce City codes and ordinances pertaining to neighborhood maintenance and supervise code enforcement staff;
- Develop programs and plans to produce housing, especially affordable housing, by means of new construction, rehabilitation or acquisition;
- Implement neighborhood improvement programs on a city-wide basis and develop neighborhood improvement strategies;
- Ensure compliance with federal and state laws and regulations and consistency with local objectives and community requirements;
- Prepare a variety of reports on housing preservation and development, neighborhood improvement and code enforcement, and other related City activities; and
- Manage programs for housing rehabilitation, first-time buyer and code enforcement.

Responsibility:	Community Development Department
Timeframe:	Current and ongoing, 2001 - 2009
Funding:	CDBG, fees, General Fund
Objective:	Improve the City's ability to focus on the implementation of housing and neighborhood improvement programs

Program 9: Annexation of Land to Accommodate Future Housing Needs

The City will work with property owners of approximately 600 acres outside the current City limits, but within Lodi's Sphere of Influence (SOI), to plan for, and annex the land to the City so that additional residential development opportunities can be provided to meet Lodi's future housing construction needs. The 600 acres is located between Harney Lane, Lower Sacramento Road, the Woodbridge Irrigation District canal, and the western SOI boundary. The City has facilitated a specific planning process with property owners of approximately 300 acres to prepare these sites for annexation to the City. The development potential for the properties to be annexed is summarized in Table II-1B.

The City does not need to annex all 600 acres within the next three to six years to meet housing construction needs given the backlog of unused housing allocations and available sites within the current City limits, but will initiate the process with property owners during the 2003 – 2009 period.

Responsibility:	Community Development Department, Planning Commission, City Council
Timeframe:	Annex initial 300 acres by December 2005; annex remaining land by December 2009.
Funding:	Annexation and permit fees
Objective:	Increase the City's residential development capacity to accommodate its share of the region's future housing construction needs between 2001 and 2009, and subsequent years, under the San Joaquin County Council of Governments housing allocation plan

Program 10: Homebuyer Assistance

The City will continue to implement a first-time homebuyer down payment assistance program. The City will continue to participate with the Housing Authority in a countywide consortium for the issuance of mortgage revenue bonds or mortgage credit certificates to assist first-time homebuyers. The City will promote the program by providing information at the Community Development Department's public counter and by providing a link to the program on the City's web site. The City's Community Improvement Manager will contact real estate agents active in Lodi to identify opportunities for program participation. Because the availability of homes within the program price limits is extremely limited in Lodi, there will likely be a small number of assisted homebuyers.

Responsibility:	Community Development Department
Timeframe:	Current and ongoing, 2003 – 2009; provide website link and information at the public counter by June 2004; Community Improvement Manager to meet with local realtors by June 2004.
Funding:	CDBG, HOME, CalHOME, CalHFA Down payment Assistance Programs, Mortgage Credit Certificates or Mortgage Revenue Bonds (through San Joaquin County or a local government consortium)
Objective:	50 homebuyers

Program 11: Commercial Linkage Fee

The City will undertake a "nexus" study to determine whether a direct connection exists between non-residential development in Lodi that creates jobs and the need for housing affordable to lower-income workers who will fill some of those jobs. The study will attempt to estimate:

- Projected employment growth by industry and occupation based on land use policies in the General Plan, zoning regulations, and development trends;
- The difference between the cost to develop housing in Lodi and amount that lower-income households can afford to pay for housing (the subsidy gap needed to make housing affordable); and
- The dollar amount per square foot, by industry or land use category, that non-residential developments would need to pay to close the subsidy gap.

Should the City determine that both: 1) a nexus exists between nonresidential development and the demand for housing affordable to lower-income households and 2) a significant subsidy gap exists between the cost to develop housing and the amount that lower-income households can afford to pay for housing, the City will consider assessing an impact fee ("commercial linkage fee") on nonresidential development that will be used to provide affordable housing in Lodi.

The City will rely on the following criteria in its decision on whether to charge an impact fee and the amount of such a fee, if assessed:

1. The cost impact on nonresidential development and the whether a commercial linkage fee would adversely affect achievement of the City's economic development goals;
2. Similar impact fees, if any, charged in nearby jurisdictions and whether such a fee in Lodi would affect the City's competitive position in attracting job-creating land uses; and
3. The potential of such a fee, compared to other techniques, to significantly increase the supply of affordable housing in Lodi.

Responsibility:	Community Development Department, City Council
Timeframe:	Complete nexus study and determine the feasibility of adopting a commercial linkage fee by December 2004; if determined to be feasible, adopt a fee by June 2005
Funding:	General Fund to conduct study, linkage fee to fund affordable housing (if adopted)
Objective:	Increase local funding options for affordable housing and improve the balance between the supply of housing affordable to the local workforce and anticipated job creation

GOAL B: To encourage the maintenance, improvement, and rehabilitation of the City's existing housing stock and residential neighborhoods, particularly in the Eastside area.

Policies

1. The City shall encourage private reinvestment in older residential neighborhoods and private rehabilitation of housing.

2. The City shall prohibit the conversion of existing single-family units to multifamily units on residentially zoned properties less than 6,000.

3. The City shall use available and appropriate state and federal funding programs and collaborate with nonprofit organizations to rehabilitate housing and improve older neighborhoods.

4. Housing rehabilitation efforts shall continue to be given high priority in the use of Community Development Block Grant (CDBG) funds, especially in the Eastside area.

5. The City shall support the revitalization of older neighborhoods by keeping streets and other municipal systems in good repair.

6. The City shall allow reconstruction of existing housing in the Eastside area and in commercially or industrially designated areas in the event such housing is destroyed or damaged.

7. The City shall implement historic preservation guidelines to preserve historically significant residential structures and insure that infill projects fit within the context of the neighborhood. (See the Urban Design and Cultural Resources Element for implementation of this policy.)

8. The City shall continue to enforce residential property maintenance standards.

Program 12: Demolition of Residential Structures

The City shall implement policies and procedures for evaluating applications for demolition of residential structures. This evaluation shall consider the implications of the demolition with respect to the retention of affordable housing. If demolitions are deemed to result in a reduction of the amount of affordable housing in Lodi, the City shall require the proponent of the demolition to cooperate with the City in providing relocation assistance to displaced residents and in determining the means for replacing demolished units. The City will provide information regarding its policies and procedures on the City's website and at the Community Development Department's public counter.

The City will determine the most appropriate method of implementing this program through a review of past demolition permits and conditions.

Responsibility:	Community Development Department
Timeframe:	Complete review by December 2004; implement new review procedures by June 2005, ongoing thereafter through 2009, based on proposals to demolish residential structures
Funding:	Permit fees, property owner contribution
Objective:	Maintain or replace existing affordable housing

Program 13: Housing Rehabilitation and Code Enforcement

The City will continue to combine code enforcement and housing rehabilitation assistance, targeted to the Eastside area. The City will promote its program through the Eastside Improvement Committee, a neighborhood organization that provides direct outreach to area residents and property owners, by providing information at the Community Development Department's public counter, and through a

link to the program on the City's website. The City's Community Improvement Manager will work with the Committee to continue marketing the program to Eastside area residents and property owners.

Responsibility:	Community Development Department
Timeframe:	Current and ongoing, 2003 - 2009
Funding:	CDBG and HOME, CalHOME
Objective:	Improvement of 1,000 housing units (including private investment to correct code violations) over five years

Program 14: Property Maintenance and Management Standards

The City will continue to implement standards for private property maintenance (Chapter 15.30 of the Municipal Code) to 1) control or eliminate conditions that are detrimental to health, safety, and welfare; 2) preserve the quality of life and alleviate certain socioeconomic problems created by physical deterioration of property; and 3).protect property values and further certain aesthetic considerations for the general welfare of all residents of the City of Lodi.

Responsibility:	Community Development Department
Timeframe:	Code enforcement on both complaint and pro-active basis, 2003 - 2009
Funding:	Inspection fees, code violation penalties, CDBG funds (for dwelling units occupied by low-income households)
Objective:	Eliminate substandard building and property conditions

Program 15: Housing Condition Survey

The City will conduct a housing survey to document its efforts at improving housing conditions and to identify future areas and housing types for targeting its code enforcement, housing rehabilitation assistance, and neighborhood improvement efforts.

Responsibility:	Community Development Department
Timeframe:	Complete survey and report to the City Council by June 2005
Funding:	CDBG, General Fund
Objective:	Document housing conditions and establish priorities for future code enforcement, housing rehabilitation assistance, and neighborhood improvement efforts

Program 16: Preservation of Affordable Rental Housing

There is one subsidized rental housing project in Lodi (Creekside South Apartments) that contains 40 housing units affordable to low-income households. These units are at risk of converting to market rate housing. To preserve Creekside South as affordable rental housing for low-income households, the City will coordinate a meeting or series of meetings between the Housing Authority, local nonprofits, and the owner (or owner's representative) to discuss the owner's intentions to remain or opt out of the federal Housing Choice Voucher (Section 8) Program and future plans for the property. If the owner intends to convert the apartments to market rate housing or sell the property, Lodi will seek to facilitate the acquisition of the property by a nonprofit or other

entity to preserve the rental units as affordable housing. The City will not take part directly in negotiations regarding the property, but will apply for state or federal funding on behalf of an interested nonprofit entity, if necessary, to protect the affordability of the rental units. Lodi will request that the property owner provide evidence that it has complied with state and federal regulations regarding notice to tenants and other procedural matters related to conversion and contact HUD, if necessary, to verify compliance with notice requirements.

Responsibility:	Community Development Department
Timeframe:	Meet with property owner and other interested parties by December 2004
Funding:	Minimal administrative cost to coordinate meetings; CDBG, HOME CalHFA, Multifamily Housing Program, and Section 207 Mortgage Insurance for Purchase/Refinance (HUD) as potential funding sources for preservation
Objective:	To preserve 40 affordable rental housing units

Program 17: Mobilehome Park Preservation

Lodi will meet with mobilehome park owners to discuss their long-term goals for their properties and the feasibility of preserving these parks. Feasibility will be evaluated based on the condition of park infrastructure and buildings, the condition of mobile homes located in the park, parcel size, accessibility to services, and surrounding land uses. Several of the parks are small (with fewer than 50 spaces) and may not be prime candidates for preservation. For those parks that are feasible to preserve, the City will:

- Assist property owners in accessing state and federal funds for park improvements by preparing funding requests, providing information to park owners on state and federal programs, and/or providing referrals to nonprofit organizations who can assist in preparing funding requests.

- Facilitate a sale to park residents of those mobile home parks the City has targeted for preservation and whose owners do not desire to maintain the present use. If necessary to facilitate a sale, the City will seek state and federal funding to assist residents in purchasing, improving, and managing their parks and/or seek the assistance of a nonprofit organization with experience in mobile home park sales and conversion to resident ownership and management.

The City shall also require, as condition of approval of change of use, that mobilehome park owners who desire to close and/or convert their parks another use provide relocation or other assistance to mitigate the displacement of park residents, as required by California Government Code Section 65863.7. The City shall also require the park owner to provide evidence of resident notification of intent to close and/or convert the mobilehome park, as required by state law.

Responsibility:	Community Development Department
Timeframe:	Meet with property owner and other interested parties by December 2004
Funding:	CDBG, HOME California Housing Finance Agency HELP program, California Mobilehome Park Resident Ownership Program
Objective:	To preserve approximately 400 mobilehomes and spaces in mobilehome parks with the highest feasibility for continued operation

Program 18: Preservation of the Eastside Area

The City will continue to target a portion of its annual CDBG allocation for public improvements in the Eastside area in support of its housing rehabilitation and neighborhood improvement activities (see Figure 2-6). The City will also maintain the Eastside single-family residential zoning as a regulatory tool to preserve the character of the neighborhood and encourage private investment in older homes.

Responsibility:	Community Development Department, Planning Commission, City Council
Timeframe:	Annual CDBG allocation, maintain zoning, 2003 - 2009
Funding:	CDBG, permit fees, impact fees
Objective:	To preserve and improve the Eastside area.

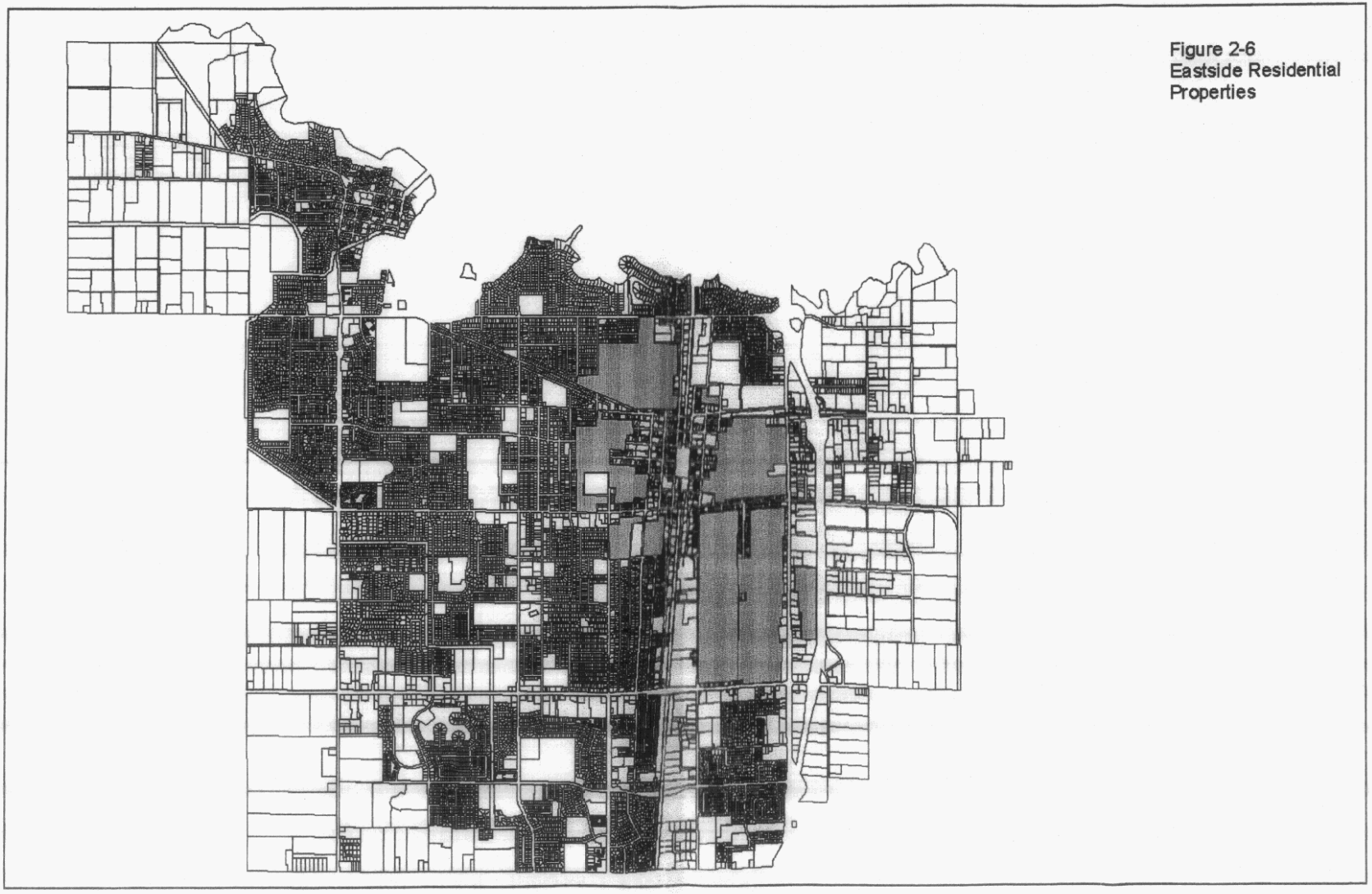

Figure 2-6
Eastside Residential Properties

Program 19: Redevelopment Agency Funding

Should the City Council adopt a redevelopment project area between 2003 and 2009, at least 20 percent of any tax increment funds accruing to the Agency will be used to support low- and moderate-income housing projects and programs. The City will also adopt an implementation plan that provides funding for public improvements to the downtown and residential neighborhoods within the redevelopment project area.

Responsibility:	City Council, Community Development Department
Timeframe:	Unknown at present—depends on the City Council's decision to activate the Agency and implement the plan
Funding:	Redevelopment tax increment
Objective:	To preserve and improve the downtown and residential areas within the proposed redevelopment project area

GOAL C: To ensure the provision of adequate public facilities and services to support existing and future residential development.

Policies

1. The City shall support the use of CDBG funds for the upgrading of streets, sidewalks, and other public improvements.

2. The City shall ensure that new residential development pays its fair share in financing public facilities and services and will pursue financial assistance techniques to reduce the cost impact on the production of affordable housing.

3. The City shall ensure that all necessary public facilities and services shall be available prior to occupancy of residential units.

4. The City shall require that park and recreational acquisitions and improvements keep pace with residential development.

Program 20: Development Impact Fees and Improvement Requirements

The City will continue to collect a unified development impact fee to pay for off-site public facilities and services needed for residential development and require that residential developers continue to provide on-site infrastructure to serve their projects. The City shall continue to charge fees that reflect the actual cost of service provided to housing units anticipated by this Element. Prior to the issuance of building permit, the City will require evidence that the developer has paid the required school impacts fees.

The City will review and adjust its fee formula for multifamily dwelling units in the medium and high density general plan land use designations so that the fee encourages the development of higher density affordable housing units while corresponding with the estimated public facility and service impact for the specific project being proposed. The review and adjustment is anticipated to result in a reduction of fees for some multifamily projects.

Water: The City shall ensure the integrity of water delivery service by constructing and operating wells.

Wastewater: The City shall ensure the provision adequate facilities and lands to effectively treat domestic wastewater while minimizing potential land use conflicts.

Streets: The City shall ensure that streets are designed and constructed that meet the intended development density while minimizing housing costs.

Parks: See Program 22.

Emergency Services: The City shall continue to ensure that new housing developments are serviced in accordance with the goals and policies of the Safety Element.

Responsibility:	Community Development Department, Planning Commission, City Council
Timeframe:	Submit proposed fee schedule adjustment to Planning Commission by July 2004, City Council to adopt new fee schedule by December 2004
Funding:	General Fund
Objective:	Reduce impact fees for multifamily projects based on actual project densities

Program 21: Growth Management Program

The City will continue to use its growth management program to ensure that the pace of development is consistent with the City's, the Lodi Unified School District's, and other public facility and service providers' abilities to provide public facilities and services and maintain minimum facility and service standards for the entire community. The City will contact other public facility and service providers annually during the housing unit allocation process to ensure that these agencies can serve the increased number of housing units to be allocated.

Responsibility:	Community Development Department, Planning Commission, City Council
Timeframe:	Annually during housing allocation process, 2003 - 2009
Funding:	Application fees, development impact fees
Objective:	To provide public facilities and services meeting minimum City standards

Program 22: Use of CDBG Funds

The City will continue to use CDBG funds to upgrade public facilities and services in older neighborhoods (see Program 17 for implementation).

Program 23: Park and Recreation Facilities

The City will annually review its Park and Recreation impact fee to ensure that these fees, in combination with other funds that may be available to the City, will allow Lodi to acquire and improve sufficient parkland and provide recreation facilities according to the minimum standards contained in the General Plan Parks, Recreation, and Open Space Element.

Responsibility: Community Development Department, Planning Commission, City Council
Timeframe: Annually prior to the adoption of a City budget, 2003 - 2009
Funding: Development impact fees, state grants for parkland acquisition, private foundation and individual donations
Objective: To provide park and recreation facilities and services meeting minimum General Plan standards

Program 24: Transit Facilities and Transit-Oriented Development

To coordinate the availability of public transit as Lodi develops and to support transit-oriented development on infill sites and properties with re-use potential, the City shall:

a. Ensure the continued construction of transit facilities, to be paid from traffic impact fees, state, and federal funding sources, and "Measure K" sales tax funds to facilitate service provision and lower the cost of living within the community.

b. Determine whether areas with infill/reuse potential (see Program 4) qualify as infill opportunity zones. The City shall designate qualified areas that are appropriately located for higher density residential and mixed-use developments in such zones, near transit facilities.

c. If adopted under action "b," promote development opportunities in infill zones through a link on the City's website, an information bulletin to be distributed to property owners within these zones, and developers and business organizations in Lodi, and one or more meetings with business and community organizations to explain the benefits and implications of infill zone designation for development opportunities.

Responsibility: Community Development Department, Planning Commission, City Council
Timeframe: Action a: annually prior to the adoption of a City budget, 2003 - 2009
Action b: Identify eligible areas by December 2004, designate infill opportunity zones by June 2005, and identify and adopt zoning amendments that are needed and appropriate to develop within infill opportunity zones by December 2005
Action c: Create website link and distribute promotional literature by December 2005; conduct one or more community meetings between January and June, 2006
Funding: Development impact fees, state, and federal transportation funds
Objective: To increase housing opportunities near transit facilities and encourage forms of travel other than private vehicles

Goal D: To promote equal opportunity to secure safe, sanitary, and affordable housing for all members of the community regardless of race, sex, or other arbitrary factors.

Program 25: Fair Housing Services

The City shall continue to promote equal housing opportunity for all persons in compliance with state and federal laws by continuing to provide funding for the operation of the City's Affirmative Fair Housing Program. Under the program, the City provides information to the public on state and

independent living. Nonprofit organizations that provide services under the strategy include the Central Valley Low Income Housing Corporation (CVLIHC), Center for Positive Prevention Alternatives (CPPA), Gospel Center Rescue Mission, and New Directions.

Responsibility:	Community Development Department, Planning Commission, City Council
Timeframe:	Current and ongoing, 2003 - 2009; annual review of applications by nonprofit organizations for use of City's share of CDBG funds
Funding:	CDBG
Objective:	To provide regional solutions to homelessness through continuum of care strategy

Goal E: To encourage residential energy efficiency and reductions in residential energy use.

1. The City shall require the use of energy conservation features in the design and construction of all new residential structures and shall promote the use of energy conservation and weatherization features in existing homes.

2. The City shall require solar access in the design of all residential projects.

3. The City shall pursue residential land use and site planning policies, and promote planning and design techniques, that encourage reductions in residential energy consumption.

Program 29: Energy Efficiency and Weatherization Improvements for Older Homes

The City shall continue to permit energy conservation and weatherization improvements as eligible activities under the Lodi Housing Rehabilitation Program. The City will post and distribute information on currently available weatherization and energy conservation programs operated by the City, nonprofit organizations, and utility companies through the Lodi website, the Community Development Department public counter, the Lodi Public Library, the Loel Senior Center, and other public locations.

Responsibility:	Community Development Department
Timeframe:	Current and ongoing, 2003 - 2009
Funding:	CDBG, HOME, public and private utilities, nonprofit organizations
Objective:	To increase energy efficiency in older homes

Program 30: Energy Conservation for New Homes

The City shall enforce state requirements for energy conservation, including Title 24 of the California Code or Regulations (state building code standards), in new residential projects and encourage residential developers to employ additional energy conservation measures in the design of new residential developments with respect to the following:

- Siting of buildings
- Landscaping
- Solar access

- Subdivision design

Responsibility:	Community Development Department
Timeframe:	Current and ongoing, 2003 – 2009 as part of review of planning and building permit applications
Funding:	Permit fees
Objective:	To increase energy efficiency in the design and construction of new homes

4.0 Project Alternatives

Statutory Requirements

The California Environmental Quality Act and the CEQA Guidelines require that alternatives to the proposed Project be discussed and analyzed in the EIR. The purpose is to inform decision-makers of the differential environmental effects that may be associated with each potential alternative and enable a reasonable judgment as to whether the Project or one of the alternatives is environmentally superior. Section 15126.6(a) of the CEQA Guidelines (October 26, 1998 revisions) provides the following description of what should be included in the analysis of project alternatives:

> *Alternatives to the Proposed Project. An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose it's reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other that the rule of reason.*

Project Objectives

In order to create feasible and likely project alternatives, it is essential to clarify the underlying objectives on which the proposed Project is based. The City of Lodi, the lead agency for this Project, has stated that there are five overriding objectives for the Housing Element. They are:

1. Achieve certification by the California Housing and Community Development Department.
2. Meet Lodi's housing needs through 2008 without enlarging the city's General Plan boundaries.
3. Adhere to goals and policies of other adopted City plans, including the Downtown Revitalization Plan.
4. Insure that the Update is consistent and complementary to existing programs identified in other General Plan Elements.
5. Insure that new housing growth is managed in a responsible manner.

In addition to the Project objectives stated above, the Housing Element must meet the requirements of State law.

The housing program must 1) identify adequate residential sites available for a variety of housing types for all income levels; 2) assist in developing adequate housing to meet the needs of low- and moderate-income households; 3) address governmental constraints to housing maintenance, improvement, and development; 4) conserve and improve the condition of the existing affordable housing stock; and, 5) promote housing opportunities for all persons.

Identification of Project Alternatives

In accordance with the alternatives analysis requirement of CEQA, alternative projects, including the No Project alternative, have been identified. These alternatives represent viable options for development of the Project area, with varying types and degrees of development. Each alternative was chosen as a way to potentially reduce environmental impacts, while still achieving some or all of the project objectives. The following section lists the design characteristics of each alternative, and provides explanations of deviations from the original project description. Impacts associated with each alternative, comparisons between alternatives and satisfaction of Project objectives are found later in the chapter.

Alternative 1: Southern Expansion Alternative

Assume that infill residential and redevelopment are not feasible, and that residential needs will have to be met outside of existing developed areas. Infill residential along Cherokee Lane or in the industrial areas could have significant air quality, noise, traffic, and land use compatibility issues (because of higher intensity adjacent uses and higher traffic roadways), which could be mitigated by relocating growth to areas south of Harney Road.

Alternative 2: Increased Density Alternative

Reduce the amount of land required for residential development by increasing the minimum density in unmapped areas designated for residential development (this could be for single and/or multi-family areas). This could lessen air quality, noise, and other impacts associated with lower density development.

Alternative 3: Increased Infill Alternative

Identify different sites for infill residential, perhaps on parcels presently designated for commercial or institutional development. This may reduce some of the impacts listed in Alternative #1, and not require any additional urban expansion.

Alternative 4: No Project Alternative

Section 15126.6(e)(1) of the Government Code provides the following direction relative to the "No Project" alternative:

> The specific alternative of "no project" shall also be evaluated along with its impact. The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed Project with the impacts of not approving the proposed Project. The no project alterative analysis is not the baseline for determining where the proposed Project's environmental impacts may be significant, unless it is identical to the existing environmental setting analysis which does establish that baseline (see Section 15125).

If the Housing Element Update were not adopted, the City would be out of compliance with State housing law, and residential development would be expected to continue in a manner consistent with existing Housing Element and General Plan policies. It is expected that infill development

would be less frequent in the No Project alternative, as this form of development has not occurred much in the city. In addition, the density of infill development that did occur would likely be lower than with the Project, as specific policies in the Update encourage development at the higher end of the allowable density range. Overall population and residential unit growth would be expected to be the same, although the reductions in infill development would likely force growth to the urban fringes along the southern and southwestern edges of the city.

Comparison of Environmental Impacts

Following is a summary of the potential environmental impacts of each alternative compared to the proposed Housing Element, in accordance with each of the environmental topic areas analyzed in this Draft EIR.

Alternative 1: Southern Expansion Alternative

Air Quality

Air quality impacts would likely be reduced in this alternative. Removing the infill component of the Project would remove the possibility of new residential growth occurring along existing industrial and commercial corridors. This would reduce the potential exposure of persons to toxic emissions from industrial uses, as well as reduce carbon monoxide hotspots, which are more likely to form in high traffic, urban intersections. While the new residential development to the south would maintain the potential for exposure to agriculturally-related toxic airborne chemicals, this risk is lower than the potential for urban exposure to toxic chemicals. The impacts associated with the alternative are fewer than with the proposed Project.

Biological Resources

In this alternative, the elimination of infill potential will push all probable residential development to the southern portion of the city. The corresponding increase in the amount of land required to construct such housing would increase the likelihood that additional agricultural and open space lands would be consumed, including possible habitat for sensitive species. In addition, expansion of the city limits and sphere of influence to the south would raise consistency issues with the County Habitat Conservation Plan, requiring additional mitigation to offset potential impacts to habitat areas. The impacts are considered greater in this alternative than in the proposed Project.

Cultural and Historic Resources

Potential impacts to cultural resources are limited to those unknown artifacts and resources which may be discovered during construction of new residential projects. While this alternative expands the amount of land required to accommodate growth, such increases would not significantly change the likelihood that artifacts would be encountered. Mitigation measures would apply equally in this alternative. Overall, impacts related to cultural resources are considered similar to the proposed Project.

Geology, Soils, and Mineral Resources
Geologic conditions in the area are generally similar across portions of the city. Relocating growth from infill sites within the existing city limits to areas outside the existing city limits on the southern side of the city will increase the potential for impacts related to erosion. The primary form of erosion in this area is windborne erosion from construction sites, thus the increased land consumption and conversion of agricultural lands to urban uses will increase impacts, compared to the proposed Project.

Health and Safety
The primary health and safety risks associated with the Housing Element are related to the potential for development of sites with hazardous materials. Infill sites, particularly those formerly used in manufacturing or other industrial activities, have a greater potential to contain hazardous materials in the soils from past activities. Thus, impacts associated with this alternative are less than with the proposed Project.

Hydrology and Water Quality
Water quality issues associated with this alternative are likely to be greater than with the proposed Project. This alternative would result in the development of more land with urban uses, including the addition of paved surfaces. This would have the potential to increase runoff, urban contaminants in runoff, reduce groundwater recharge, and potentially degrade area waterways to a greater extent. The impacts of this alternative are greater than the proposed Project with regards to hydrology and water quality.

Land Use Planning, Agricultural and Visual Resources
Removal of the infill potential from the Project, and consequently relocating growth toward the southern end of the community, could serve to alleviate potential land use compatibility issues. Several of the areas considered for infill have the potential to causes nuisances on new residents by placing housing close to high volume roadways, manufacturing facilities, and truck routes. More rapid outward expansion does have the potential to place added pressure on agricultural lands south of the city to convert to urban uses. There are no anticipated differences between the proposed Project and the alternative with regard to visual resources. Overall, the impacts from land use incompatibilities will be reduced to a greater degree than the impacts to agricultural resources will be increased. The impacts to this topic area are considered fewer in this alternative than in the proposed Project.

Noise
Noise impacts could be significantly reduced in this alternative. Infill development has a greater potential to affect surrounding land uses during construction, and future residents have a greater potential to be affected by surrounding land uses and heavy traffic than development on the urban fringe. A higher ambient noise level in the infill areas also poses a more significant potential for noise impacts than areas away from the city center. Noise impacts are expected to be fewer in this alternative than in the proposed Project.

Population and Housing
This alternative does not alter the projected number of dwelling units needed to accommodate new growth, nor will it have any additional growth-inducing impacts beyond those associated with the proposed Project. Impacts are considered similar.

Public Facilities and Services

Impacts to public facilities and services will be associated with this alternative. Infill development could better utilize existing infrastructure, including water and sewer infrastructure, proximity to existing police and fire stations, parks, and schools. While overall service demand would not change, the ability of the service providers to maintain levels of service would be worsened in this alternative. Therefore, the impacts associated with public facilities and services are considered greater in this alternative than in the proposed Project.

Transportation

Impacts related to transportation associated with this alternative include potential reduction in levels of service on area roadways and intersections, as well as potential impacts to demand for transit services. The infill policies of the proposed Project have a greater potential to adversely affect intersection levels of service due to the higher existing traffic volumes in the core of the city. Movement of the residential development to the southerly portion of the city would reduce the potential impacts to existing high-traffic intersections and reduce overall transportation impacts. The impacts to transportation systems would likely be reduced in this alternative.

Alternative 2: Increased Density Alternative

Air Quality

Impacts associated with air quality are expected to be lessened in this alternative. By increasing the density range of new developments, the alternative would reduce short-term construction-related emissions. In addition, the reduction in land consumption could reduce the amount of necessary outward expansion of the community, reducing the potential for residents of new homes to be exposed to toxic air pollutants produced on nearby agricultural lands. Overall, the impacts to air quality are reduced in this alternative.

Biological Resources

Impacts to biological resources would likely be reduced in this alternative. Major impacts associated with residential development include the potential to impact sensitive wildlife habitats or jurisdictional wetlands. An increase in density, and its corresponding reduction in land consumption, affords greater opportunities to avoid sensitive habitat areas and wetlands. This alternative would result in fewer impacts to biological resources than the proposed Project.

Cultural and Historic Resources

Potential impacts to cultural resources are limited to those unknown artifacts and resources which may be discovered during construction of new residential projects. While this alternative reduces the amount of land required to accommodate growth, such decreases would not significantly change the likelihood that artifacts would be encountered. Mitigation measures would apply equally in this alternative. Overall, impacts related to cultural resources are considered similar to the proposed Project.

Geology, Soils, and Mineral Resources

Geologic conditions in the area are generally similar across portions of the city. Increasing the density in new developments and infill sites will reduce the amount of land required to support new residential development, thus reducing the potential for impacts related to erosion. The primary form of erosion in this area is windborne erosion from construction sites, thus a decrease in land

consumption and conversion of agricultural lands to urban uses will decrease impacts, as compared to the proposed Project.

Health and Safety

The primary health and safety risks associated with the Housing Element are related to the potential for development of sites with hazardous materials. The most probable sites for encountering hazardous materials are located in the projected infill areas. This alternative does not change the amount of site disturbance or development of these infill areas, thus the likely potential for impacts remains the same as with the proposed Project. Impacts are considered similar between this alternative and the proposed Project, with regards to health and safety.

Hydrology and Water Quality

Water quality issues associated with this alternative are likely to be reduced in this alternative. This alternative would result in greater intensity and density of development, requiring less overall land consumption. This would have the potential to decrease runoff, urban contaminants in runoff, have less impact upon groundwater recharge, and reduce degradation of area waterways as compared to the Project. The impacts of this alternative are fewer than with the proposed Project.

Land Use Planning, Agricultural and Visual Resources

Issues related to land use compatibility, agricultural resources, and visual resources are expected to remain similar in this alternative to the proposed Project. Increasing the density of development will result in less overall land consumption, but will not alter the placement of housing in commercial and industrial areas – the main source of potential land use compatibility conflicts. The residential growth areas that would not be consumed in this alternative would likely not be prime agricultural areas, thus no impacts to this resource would be reduced by the alternative. Visual resources would also not be changed. Overall, the impacts are considered similar to the proposed Project.

Noise

Noise impacts could be increased in this alternative. Infill development has a greater potential to affect surrounding land uses during construction, and future residents have a greater potential to be affected by surrounding land uses and heavy traffic than development on the urban fringe. Raising densities in infill areas will increase the amount of construction in these areas, as well as increase the population potentially affected by existing noise sources in the area. Overall, impacts are considered greater in this alternative with regards to noise.

Population and Housing

This alternative does not alter the projected number of dwelling units needed to accommodate new growth, nor will it have any additional growth-inducing impacts beyond those associated with the proposed Project. Impacts are considered similar.

Public Facilities and Services

Impacts to public facilities and services will be associated with this alternative. Infill development could better utilize existing infrastructure, including water and sewer infrastructure, proximity to existing police and fire stations, parks, and schools. While overall service demand would not change, the ability of the service providers to maintain levels of service would be improved in this alternative due to the greater percentage of infill associated with new residential development. Therefore, the impacts associated with public facilities and services are considered lesser in this alternative than in the proposed Project.

Transportation
Impacts related to transportation associated with this alternative include potential reduction in levels of service on area roadways and intersections, as well as potential impacts to demand for transit services. The infill policies of the proposed Project have a greater potential to adversely affect intersection levels of service due to the higher existing traffic volumes in the core of the city. Increasing the density of the residential development in the infill areas of the city would increase the potential impacts to existing high-traffic intersections and increase overall transportation impacts. The impacts to transportation systems would likely be increased in this alternative.

Alternative 3: Increased Infill Alternative

Air Quality
Impacts associated with air quality are expected to be lessened in this alternative. By increasing the percentage of development in the infill categories, the alternative would reduce short-term construction-related emissions. Infill properties are likely to develop at greater densities than greenfield developments, thus resulting in less land consumption. In addition, the reduction in land consumption could reduce the potential for residents of new homes to be exposed to toxic air pollutants produced on nearby agricultural lands. Conversely, the addition of new residents into manufacturing and commercial areas increases the potential for exposure to urban toxic air pollutants generated in some manufacturing facilities. Overall, the impacts to air quality are reduced in this alternative.

Biological Resources
Impacts to biological resources would likely be reduced in this alternative. Major impacts associated with residential development include the potential to impact sensitive wildlife habitats or jurisdictional wetlands. An increase in the percentage of development that is infill will reduce the necessary outward expansion of the community to meet housing needs. Sensitive habitat areas are more likely to occur on greenfield sites, thus the alternative increases the potential to avoid sensitive habitat areas and wetlands. This alternative would result in fewer impacts to biological resources than the proposed Project.

Cultural and Historic Resources
Potential impacts to cultural resources are limited to those unknown artifacts and resources which may be discovered during construction of new residential projects. While this alternative increases the amount of infill development, correspondingly reducing the amount of greenfield development, such decreases would not significantly change the likelihood that artifacts would be encountered. Mitigation measures would apply equally in this alternative. Overall, impacts related to cultural resources are considered similar to the proposed Project.

Geology, Soils, and Mineral Resources
Geologic conditions in the area are generally similar across portions of the city. Increasing the number and population housed on infill sites will reduce the amount of land required to support new residential development, thus reducing the potential for impacts related to erosion. The primary form of erosion in this area is windborne erosion from construction sites, thus a decrease in land consumption and conversion of unimproved lands to urban uses will decrease impacts, as compared to the proposed Project.

Health and Safety

The primary health and safety risks associated with the Housing Element are related to the potential for development of sites with hazardous materials. The most probable sites for encountering hazardous materials are located in the projected infill areas. This alternative increases the number of infill sites that may be developed for housing, thus raising the potential for impacts to new residents. Impacts are considered greater in this alternative than in the proposed Project.

Hydrology and Water Quality

Water quality issues associated with this alternative are likely to be reduced in this alternative. This alternative would result in greater infill development, where existing infrastructure is in place with the ability to support residential uses. Urban infill development would also be likely to occur at higher densities, thus reducing the amount of pavement and impervious surfaces created by the new development. This would have the potential to decrease runoff, urban contaminants in runoff, have less impact upon groundwater recharge, and reduce degradation of area waterways as compared to the Project. The impacts of this alternative are fewer than with the proposed Project.

Land Use Planning, Agricultural and Visual Resources

Issues related to land use compatibility, agricultural resources, and visual resources are expected to increase in this alternative to the proposed Project. Increasing the amount of infill, and thus the overall density of new development, will result in less overall land consumption, but will serve to increase the placement of housing in commercial and industrial areas – the main source of potential land use compatibility conflicts. The residential growth areas that would not be consumed in this alternative would likely not be prime agricultural areas, thus no impacts to this resource would be reduced by the alternative. Visual resources would also not be changed. Overall, the impacts to land use planning will increase in this alternative, with impacts to agricultural and visual resources remaining similar to the proposed Project.

Noise

Noise impacts would likely be increased in this alternative. Infill development has a greater potential to affect surrounding land uses during construction, and future residents have a greater potential to be affected by surrounding land uses and heavy traffic than development on the urban fringe. Raising densities in infill areas will increase the amount of construction in these areas, as well as increase the population potentially affected by existing noise sources in the area. Overall, impacts are considered greater in this alternative with regards to noise.

Population and Housing

This alternative does not alter the projected number of dwelling units needed to accommodate new growth, nor will it have any additional growth-inducing impacts beyond those associated with the proposed Project. Impacts are considered similar.

Public Facilities and Services

Impacts to public facilities and services will be reduced with this alternative. Infill development could better utilize existing infrastructure, including water and sewer infrastructure, proximity to existing police and fire stations, parks, and schools. While overall service demand would not change, the ability of the service providers to maintain levels of service would be improved in this alternative due to the greater percentage of infill associated with new residential development. Therefore, the impacts associated with public facilities and services are considered lesser in this alternative than in the proposed Project.

Transportation

Impacts related to transportation associated with this alternative include potential reduction in levels of service on area roadways and intersections, as well as potential impacts to demand for transit services. The infill policies of the proposed Project have a greater potential to adversely affect intersection levels of service due to the higher existing traffic volumes in the core of the city. Increasing the amount of infill residential development would increase the potential impacts to existing high-traffic intersections and increase overall transportation impacts. Transit demand would not be altered as a result of the alternative. The impacts to transportation systems would likely be increased in this alternative.

Alternative 4: No Project Alternative

Air Quality

Air quality impacts would likely be reduced in this alternative. Reducing the infill component of the Project would force a greater percentage of new residential growth to southern and western greenfield sites. This would reduce the potential exposure of persons to toxic emissions from industrial uses, as well as reduce carbon monoxide hotspots, which are more likely to form in high traffic, urban intersections. While the new residential development to the south and west would maintain the potential for exposure to agriculturally-related toxic airborne chemicals, this risk is lower than the potential for urban exposure to toxic chemicals. The impacts associated with the alternative are fewer than with the proposed Project.

Biological Resources

In this alternative, the reduced likelihood that infill properties will develop with residential uses will push most probable residential development to the southern portion of the city. The corresponding increase in the amount of land required to construct such housing would increase the likelihood that additional agricultural and open space lands would be consumed, including possible habitat for sensitive species. In addition, expansion of the city limits and sphere of influence to the south and west would raise consistency issues with the County Habitat Conservation Plan, requiring additional mitigation to offset potential impacts to habitat areas. The impacts are considered greater in this alternative than in the proposed Project.

Cultural and Historic Resources

Potential impacts to cultural resources are limited to those unknown artifacts and resources which may be discovered during construction of new residential projects. While this alternative expands the amount of land required to accommodate growth, such increases would not significantly change the likelihood that artifacts would be encountered. Mitigation measures would apply equally in this alternative. Overall, impacts related to cultural resources are considered similar to the proposed Project.

Geology, Soils, and Mineral Resources

Geologic conditions in the area are generally similar across portions of the city. Relocating growth from infill sites within the existing city limits to areas outside the existing city limits on the southern side of the city will increase the potential for impacts related to erosion. The primary form of erosion in this area is windborne erosion from construction sites, thus the increased land consumption and conversion of agricultural lands to urban uses will increase impacts, compared to the proposed Project.

Health and Safety

The primary health and safety risks associated with the Housing Element are related to the potential for development of sites with hazardous materials. Infill sites, particularly those formerly used in manufacturing or other industrial activities, have a greater potential to contain hazardous materials in the soils from past activities. The reduction in infill development will reduce the potential for this impact. Thus, impacts associated with this alternative are less than with the proposed Project.

Hydrology and Water Quality

Water quality issues associated with this alternative are likely to be greater than with the proposed Project. This alternative would result in the development of more land with urban uses, including the addition of paved surfaces. This would have the potential to increase runoff, urban contaminants in runoff, reduce groundwater recharge, and potentially degrade area waterways to a greater extent. The impacts of this alternative are greater than the proposed Project with regards to hydrology and water quality.

Land Use Planning, Agricultural and Visual Resources

Reducing the amount and density of the infill residential, and consequently relocating growth toward the southern and western ends of the community, could serve to alleviate potential land use compatibility issues. Several of the areas considered for infill have the potential to causes nuisances on new residents by placing housing close to high volume roadways, manufacturing facilities, and truck routes. More rapid outward expansion does have the potential to place added pressure on agricultural lands south of the city to convert to urban uses. There are no anticipated differences between the proposed Project and the alternative with regard to visual resources. Overall, the impacts from land use incompatibilities will be reduced to a greater degree than the impacts to agricultural resources will be increased. The impacts to this topic area are considered fewer in this alternative than in the proposed Project.

Noise

Noise impacts could be significantly reduced in this alternative. Infill development has a greater potential to affect surrounding land uses during construction, and future residents have a greater potential to be affected by surrounding land uses and heavy traffic than development on the urban fringe. A higher ambient noise level in the infill areas also poses a more significant potential for noise impacts than areas away from the city center. Noise impacts are expected to be fewer in this alternative than in the proposed Project.

Population and Housing

This alternative does not alter the projected number of dwelling units needed to accommodate new growth, nor will it have any additional growth-inducing impacts beyond those associated with the proposed Project. Impacts are considered similar.

Public Facilities and Services

Impacts to public facilities and services will be greater with this alternative. Infill development could better utilize existing infrastructure, including water and sewer infrastructure, proximity to existing police and fire stations, parks, and schools. While overall service demand would not change, the ability of the service providers to maintain levels of service would be worsened in this alternative. The removal of infill potential worsens these impacts. Therefore, the impacts associated with public facilities and services are considered greater in this alternative than in the proposed Project.

Transportation
Impacts related to transportation associated with this alternative include potential reduction in levels of service on area roadways and intersections, as well as potential impacts to demand for transit services. The infill policies of the proposed Project have a greater potential to adversely affect intersection levels of service due to the higher existing traffic volumes in the core of the city. Movement of the residential development to the southerly portion of the city would reduce the potential impacts to existing high-traffic intersections and reduce overall transportation impacts. The impacts to transportation systems would likely be reduced in this alternative.

Comparative Environmental Superiority

Table 4-1 provides a summary comparison of the potential environmental impacts of each of the four alternatives, including the "No Project" alternative with the proposed Housing Element, using the following terms:

Greater: The impacts associated with the alternative are greater than those associated with the proposed Project.

Similar: The impacts associated with the alternative are proportional to those associated with the proposed Project.

Less: The impacts associated with the alternative are less than those associated with the proposed Project.

Table 4-1
Comparison of Project with Alternatives

Environmental Topic	Alternative 1	Alternative 2	Alternative 3	No Project Alternative
Air Quality	Less	Less	Less	Less
Biological Resources	Greater	Less	Less	Greater
Cultural and Historic Resources	Similar	Similar	Similar	Similar
Geology Soils and Minerals	Greater	Less	Less	Greater
Health and Safety	Less	Similar	Greater	Less
Hydrology and Water Quality	Greater	Less	Less	Greater
Land Use/Ag/Visual Resources	Less	Similar	Similar	Less
Noise	Less	Greater	Greater	Less
Population and Housing	Similar	Similar	Similar	Similar
Public Facilities and Services	Greater	Less	Less	Greater
Transportation	Less	Greater	Greater	Less
Comparative Rank	**4**	**1**	**2**	**3**
Objectives Accomplished	**3 of 5**	**5 of 5**	**5 of 5**	**3 of 5**

Among the five choices (the proposed Project and the four alternatives), Alternative 2: Increased Density Alternative is the environmentally superior choice. Rankings of each of the alternatives with respect to environmental superiority are found in Table 4-1. This alternative, as well as Alternative 3: Increased Infill Alternative, are environmentally superior to the Project and meet all five of the project objectives.

5.0 Cumulative and Long-Term Impacts

Cumulative and Significant Irreversible Impacts

CEQA Section 15126(c) requires an analysis of potential irreversible changes that would occur as a result of project approval. As noted in that section, "uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely." Primary impacts and, particularly, secondary impacts, such as highway improvement which provides access to a previously inaccessible area, generally commit future generations to similar uses. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

Significant Irreversible Environmental Changes

Housing projects developed on lands surrounding Lodi could result in the permanent loss of valuable agricultural resources to urban development. These agricultural lands are not only productive economically, but represent important aesthetic resources for the community. Agricultural land conversion can have indirect impacts on adjacent ongoing agricultural operations and agriculture-dependent businesses. Though the Housing Element does not propose projects in areas with sensitive biological resources, construction and urban development can disturb habitats and movement of species, depending on project location, intensity and type of development, and site layout. These various impacts will be irreversible for the most part. Mitigation measures in this EIR are identified, where appropriate, that reduce impacts in these environmental topic areas to a less-than-significant level, wherever feasible. The General Plan identifies policies that would reduce impacts in most topic areas to less-than-significant levels. Some impacts of Housing Element implementation would be significant and unavoidable, and are identified in appropriate sections of the report.

Consumption of Nonrenewable Resources

Any housing projects encouraged or facilitated by the Housing Element would commit nonrenewable resources during construction and operation. Raw materials will be used to construct the new homes, roads, and facilities, while water, energy, and fossil fuels will be used in operations of the homes and vehicles that serve the homes. The loss of non-renewable energy resources will be irreversible and irretrievable. Energy will be consumed in processing building materials and for transporting these materials and construction workers to the proposed project site, as well as for project construction and operation.

Energy conservation standards are required, as specified in Title 24 (Part 6 of the California Building Standards Code), as well as programs and policies of Goal E of the Housing Element. Automobile traffic attracted to, and generated at, the housing projects will consume fossil fuels. Ongoing

operation of heating and cooling systems at individual homes would contribute to the permanent loss of nonrenewable resources.

Growth Inducing Impacts

Future residents of Lodi living in homes encouraged or facilitated by Housing Element policies will require goods and services, both private and public. Public facilities and services impacts are reviewed explicitly in this EIR. However, the Housing Element does not increase the projected buildout population of the city. All housing development envisioned within the Housing Element update is projected to take place within existing city limits and the adopted Sphere of Influence. The timing and spatial arrangement of residential development in the City may be influenced by Housing Element policies, but the overall level of growth is not expected to be substantially increased.

Cumulative Impacts

Section 15130 of the CEQA Guidelines requires an analysis of the potential cumulative impacts of the Project. Cumulatively considerable, as defined in Section 15065(c), "means that the incremental effects of an individual 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."

An adequate discussion of significant cumulative impacts requires either (1) "a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency" or (2) "a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact."

The geographic scope of analysis for the Project is the Lodi Planning Area, which includes the incorporated City limits and the Sphere of Influence. Effects of the Housing Element are considered cumulatively with other aspects of the buildout of the General Plan Area (as summarized in Table 5-1). All housing development encouraged by policies in the Housing Element Update would occur within existing city limits and the adopted Sphere of Influence. Specific Plans for new developments within the planned annexation areas would be required, as would CEQA environmental review. The General Plan and General Plan EIR include mitigation measures and mitigating policies that reduce many impacts to less-than-significant levels. The Housing Element does not alter these policies or mitigation measures. This EIR includes mitigation measures for some impacts that would reduce the cumulative impact to a less-than-cumulatively considerable level. The following table does not include a discussion of impacts or impact areas except areas where potentially significant cumulative impacts are identified.

Significant cumulative impacts to air quality, agricultural resources, and scenic resources would result from implementation of the Housing Element coupled with buildout of the General Plan.

Table 5-1
Cumulative Impacts of Housing Element Implementation

Environmental Topic	Cumulative Impact Description	Cumulative Considerations	Significance
Air Quality	Carbon monoxide hot spots	Though roadway improvements in the city are designed to meet LOS standards that will prevent substantial congestion and carbon monoxide concentrations, infill development may introduce traffic-attracting or traffic-generating land uses in areas where roadway improvements are infeasible or undesirable.	Significant and unavoidable
	Adverse impact to air quality attainment efforts	Construction and operation of development projects envisioned in General Plan buildout would adversely affect the Air District's efforts to achieve compliance with State and federal ozone and particulate matter standards. Mitigation is included in this EIR, the General Plan EIR, and mitigating policies are included in the Housing Element and General Plan.	Significant and unavoidable
Land Use Planning, Agricultural Resources, and Visual Resources	Conversion of prime agricultural lands	Annexation and conversion of prime agricultural lands outside the city limits, as envisioned in the General Plan and Housing Element Update, represents a potentially significant impact. Mitigating policies are included in both documents, including a prime agricultural land mitigation fee, agricultural buffers, establishment of an agricultural greenbelt around the city, and adoption of a "right-to-farm" ordinance. Beyond outright prohibition of development of prime agricultural lands, there are no other available mitigation measures.	Significant and unavoidable
	Loss of scenic resources	Annexation and conversion of agricultural lands, which are considered important scenic resources for the community, represents a potentially significant impact. Beyond outright prohibition of development of agricultural lands, there are no other available mitigation measures.	Significant and unavoidable
Noise	Cumulative noise increase	Implementation of the Housing Element and buildout of the General Plan would add traffic to city streets, and would potentially result in noise above local compatibility standards where mitigation would be infeasible. Noise would be generated by development of undeveloped areas, increasing the ambient noise levels substantially. Residential development along busy streets or along the railroad tracks may create incompatibility related to noise exposure. The City has detailed noise analysis and	Significant and unavoidable

Table 5-1
Cumulative Impacts of Housing Element Implementation

Environmental Topic	Cumulative Impact Description	Cumulative Considerations	Significance
		mitigation requirements, and no further mitigation is available.	
Transportation	Adverse effect on intersection and roadway segment level of service	Introduction of additional residential development into areas of the city with congested roadways may reduce intersection levels of service to unacceptable levels. Increased density and infill development would create challenges for transportation planning. Development encouraged by the Housing Element also may create congestion where roadways previously functioned at uncongested levels, or may change the distribution of traffic patterns in such a way that levels of service are adversely affected. In some already developed areas of the city, if additional development occurs, typical automobile traffic mitigation may not be feasible or appropriate to relieve peak hour congestion. Additional right-of-way may be difficult to acquire. Other than traffic analysis and fair-share transportation improvements requirements, no other feasible mitigation remains.	Significant and unavoidable

6.0 References

1 California Air Resources Board. *California Air Quality Almanac.* 2002.

2 California Air Resources Board. *Transportation-Related Land Use Strategies to Minimize Motor Vehicle Emissions: An Indirect Source Research Study.* 1995.

3 California Department of Conservation. California Department of Conservation Farmland Mapping and Monitoring Program. *2000 FIELD REPORT, COUNTY: San Joaquin.* 2001.

4 California Department of Conservation. Farmland Mapping and Monitoring Program. Statistics and Reports. County, Regional & Statewide Farmland Conversion Tables. www.consrv.ca.gov.

5 City of Lodi, *Draft General Plan Environmental Impact Report,* 1990; City of Lodi, General Plan Policy Document. 1991.

6 City of Lodi, ICMA Center for Performance Measurement, FY 2001 Parks and Recreation Template.

7 City of Lodi. *Draft General Plan Background Report.* January 1990.

8 City of Lodi. *Draft Redevelopment Plan Environmental Impact Report,* 1991.

9 San Joaquin County Agricultural Commissioner. *Annual Report of Agricultural Production in San Joaquin County.* 2002.

10 San Joaquin County. *Draft San Joaquin County Multi-Species Habitat Conservation & Open Space Plan,* 2003.

11 San Joaquin Valley Unified Air Pollution Control District. *An Extreme Choice.* www.valleyair.org.

12 San Joaquin Valley Unified Air Pollution Control District. *Guide for Assessing and Mitigating Air Quality Impacts.* August 1998 (revised June 1999).

13 State Water Resources Control Board. *Farad Diversion Dam Replacement Project Draft Environmental Impact Report.* March 2002.

7.0 Persons and Agencies Contacted

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3.0 Environmental Analyses

Organization of EIR

The discussion of each of the environmental topics addressed in this Draft EIR, as identified in Section 1.0 is organized in the following manner:

Environmental Setting

This sub-section provides a description of the environmental conditions that may be affected by the Project.

Regulatory Background

This sub-section identifies local, regional, State, and federal agencies which have jurisdictional control over some environmental resource or relevant regulation or approval. The section will explain the presiding agency's jurisdictional power and list the specific documents, standards, or policies that will govern the environmental analysis. This section will appear only where there are applicable controlling agencies for the environmental topic.

Thresholds of Significance

This sub-section identifies the thresholds, or evaluation criteria, by which potential impacts are measured and determined to be significant or less than significant. Impact evaluation criteria include local, State, and federal standards, where applicable, and criteria contained in Appendix "G" of the CEQA Guidelines.

Environmental Impact and Mitigation Measures

This section includes two sub-sections, as described below:

- ***Description of Potential Impacts:*** Each potential impact associated with the environmental topic area is described relative to the relevant impact threshold criterion. Each potential impact is given a summary heading and a number for future reference and to correspond with mitigation measures.

- ***Mitigation Measures:*** To the extent practicable, a mitigation measure is recommended for each identified potential impact. Each mitigation measure is numbered for future reference and states to which impact the mitigation would apply.

The level of significance following application of recommended mitigation measures is identified as being either significant and unavoidable or less than significant.

The above-described text organization conforms to the standards for adequacy of an EIR set forth in Section 15151 of the CEQA Guidelines, which states:

> An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and good faith effort at full disclosure.

Scope and Methodology

City staff determined that the proposed Project could have a significant effect on the environment, requiring an EIR. The following are the environmental topic areas that receive full analysis in the following sections:

- Air quality
- Biology
- Cultural resources
- Geology, soils, and mineral resources
- Hydrology and water quality
- Land use planning, agricultural resources, and visual resources
- Noise
- Population and housing
- Public facilities and services
- Safety
- Transportation

3.1 Air Quality

This section examines the potential air quality impacts resulting from implementation of the Housing Element update. Air quality impacts are considered both in the short term and in the long term. Short-term effects are those impacts resulting from construction activities. Long-term effects are primarily the result of increased traffic, but can include other impacts. Cumulative air quality impacts are addressed in Section 5.0.

Environmental Setting

Weather and topography both influence air quality. The California Air Resources Board (ARB) has divided California into regional air basins for monitoring and regulation of air quality. Lodi is located within the San Joaquin Valley Air Basin (SJVAB), a 250-mile-long and 35-mile-wide valley in the central and southern portion of California's great central valley. Air pollutants are confined by the Sierra Nevada Mountains in the east, the Coast Ranges in the west, and the Tehachapi transverse mountain range to the south. An opening in the valley exists at the Carquinez Straits where the San Joaquin and Sacramento rivers empty into the San Francisco Bay. The valley's surrounding topographic features and resulting weak air flow, which becomes blocked vertically by high barometric pressure, causes air pollutants to accumulate.

Summer winds usually originate at the northern end of the valley and flow to the south or southeast. During the winter, wind occasionally originates from the south end of the valley, flowing in a north to northwesterly direction. Low wind speeds, combined with low inversion layers in the winter, encourage high carbon monoxide and particulate matter concentrations.[1] Sea breezes from the north occur during the day, while land breezes can predominate at night. Upslope mountain flow occurs during the day, while downslope (valley) flow can predominate at night.

The SJVAB has an Inland Mediterranean climate, with warm, dry summers and cooler, humid winters.

Daytime surface temperature inversions during the summer are more frequent in the southern portion of the San Joaquin Valley than near Lodi, but winter inversions occur with some frequency, trapping pollutants near the ground. Subsidence inversions also occur due to the relative proximity of mountain ranges and the subsequent differential pressure changes in the atmosphere as air moves from mountain ranges down into the valley.

Regulatory Background

Lodi is located in the SJVAB, and is under the jurisdiction of the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) at the local level, and the California Air Resources Board (CARB) at the State level. Local air pollution control districts are charged with monitoring and regulating air quality within these air basins based on federal and State legislation.

Criteria Pollutants

The U.S. Environmental Protection Agency (EPA) is responsible for implementation of the Federal Clean Air Act of 1970, as amended. This act requires the EPA to establish National Ambient Air Quality Standards (NAAQS) in order to protect the public health. Both the federal government and the State of California have set ambient air quality standards based on the health-related impacts of six pollutants (criteria pollutants), which could potentially be affected by construction and operation of housing accommodated through the Housing Element update:

- Sulfur dioxide (SO_2)
- Lead (Pb)
- Carbon monoxide (CO)
- Fine particulate matter (PM_{10})
- Nitrogen dioxide (NO_2)
- Ozone (O_3)

The Lodi portion of the San Joaquin Valley Air Basin is in nonattainment for ozone and PM_{10}, as shown in Table 3.1-1. About 60 percent of the valley's ozone problems come from cars, diesel trucks, and other mobile sources.[2] The other 40 percent is a result of business' and industrial operations.

Table 3.1-1
Attainment Status, Lodi Portion of SJVAB

Pollutant	Designation/Classification	
	Federal Standards	State Standards
Ozone	Severe Nonattainment	Severe Nonattainment
PM_{10}	Serious Nonattainment	Nonattainment
CO	Unclassified/Attainment	Attainment
Nitrogen Dioxide	Unclassified/Attainment	Attainment
Sulfur Dioxide	Unclassified	Attainment
Lead (Particulate)	No Designation	Attainment
Hydrogen Sulfide	No Federal Standard	Unclassified
Sulfates	No Federal Standard*	Attainment
Visibility Reducing Particles	No Federal Standard	Unclassified

Source: SJVUAPCD web site, 2003.

The standards have been designed to protect sensitive populations from illness or discomfort (with a margin of safety). The California standards are more stringent than federal standards, and in the case of PM_{10} and SO_2, far more stringent. Table 3.1-2 outlines federal and State ambient air quality standards.

Table 3.1-2
Air Pollution Standards, Sources, and Effects

Air Pollutant	State Standard	Federal Primary Standard	Sources	Primary Effects
Ozone (O_3)	0.09 ppm 1-hour avg.	0.12 ppm 1-hour avg.	Atmospheric reaction of organic gases with nitrogen oxides in sunlight	Aggravation of respiratory and cardiovascular diseases, irritation of eyes, impairment of cardiopulmonary function, plant leaf injury
Carbon Monoxide (CO)	9.0 ppm, 8-hour avg., 20 ppm, 1-hour avg.	9.0 ppm 8-hour avg. 35 ppm 1-hour avg.	Incomplete combustion of fuels and other carbon-containing substances such as motor vehicle exhaust, natural events, such as decomposition of organic matter	Reduced tolerance for exercise, impairment of mental function, impairment of fetal development, death at high levels of exposure, aggravation of some heart diseases (angina)
Nitrogen Dioxide (NO_2)	0.25 ppm, 1-hour avg.	0.053 ppm annual avg.	Motor vehicle exhaust, high-temperature stationary combustion, atmospheric reactions	Aggravation of respiratory illness, reduced visibility, reduced plant growth, formation of acid rain
Sulfur Dioxide (SO_2)	0.25 ppm 1-hour avg. 0.05 ppm 24-hour avg. with ozone > = 0.10 ppm, 1 hour avg. or TSP > = 100 $\mu g/m^3$ 24-hour avg.	0.03 ppm annual avg. 0.14 ppm 24-hour avg.	Combustion of sulfur-containing fossil fuels, smelting of sulfur-bearing metal ores, industrial processes	Aggravation of respiratory diseases (asthma, emphysema), reduced lung function, irritation of eyes, reduced visibility, plant injury, deterioration of metals, textiles, leather, finishes, coatings, etc.
Fine Particulate Matter (PM_{10})	30 $\mu g/m^3$, annual geometric mean; > 50 $\mu g/m^3$ 24-hour avg.	50$\mu g/m^3$ annual arithmetic mean 150 $\mu g/m^3$ 24-hour avg.	Stationary combustion of solid fuels, construction activities, industrial processes, industrial chemical reactions, agricultural operations	Reduced lung function, aggravation of the effects of gaseous pollutants, aggravation of respiratory and cardio-respiratory diseases, increased coughing and chest discomfort, soiling, reduced visibility
Lead (Pb)	1.5 $\mu g/m^3$ 30-day avg.	1.5 $\mu g/m^3$ calendar quarter	Contaminated soil	Increased body burden, impairment of blood formation and nerve conduction
Visibility Reducing Particles	Sufficient to reduce visual range to less than 10 miles at relative humidity less than 70%, 8-hour avg. (9am - 5pm)			Visibility impairment on days when relative humidity is less than 70 percent

Notes: $\mu g/m^3$ = micrograms per cubic meter of air; ppm = parts per million of air, by volume.
Source: California Air Resources Board Web Site: www.ca.arb.gov

Because lead-based gasoline has been phased out in California, airborne lead pollution is no longer a problem in the valley – neither is SO_2 nor NO_2 pollution. Most wide-scale pollution control programs have relied on development and application of cleaner technology and emission control devices for vehicular and industrial sources, such as catalytic converters for automobiles. But more recent efforts have been directed at how emission sources are used (e.g., the Inspection and Maintenance Program, High Occupancy Vehicle Lanes, Heavy Duty Vehicle and Equipment Incentive Program, and mandatory procedures on industrial sources). The efforts of the SJVUAPCD are focused primarily on attainment of State and federal standards for ozone and particulate matter and maintaining attainment standards for all criteria pollutants, as well as permitting and monitoring toxic emissions.

Toxic Air Pollutants

The federal government and state governments have implemented programs to control toxic air emissions. The Federal Clean Air Act provides a program for the control of hazardous air pollutants. In particular, the federal government includes a list of Hazardous Air Pollutants (HAPs), which are controlled by the National Emissions Standards for Hazardous Air Pollutants, known as NESHAPs (CFR, Title 40, Chapter I, Part 61). Likewise, the California legislature has enacted programs including the Tanner Toxics Act, the Air Toxics Hot Spot Assessment Program, the Toxics Emissions Near Schools Program, and the Disposal Site Air Monitoring Program. Sources of toxic air pollutants are required to comply with conditions established in the SJVUAPCD's stationary source permitting process, through which the aforementioned statutes are implemented.

Air Quality Trends in the Project Area

Several air quality monitoring stations operated by the San Joaquin Valley Unified Air Pollution Control District are located in relative proximity to Lodi, though none operate within its jurisdictional boundaries. The following air quality monitoring stations are located in San Joaquin County (approximate distances from Lodi are indicated in parentheses):

- 4987 Claremont Boulevard, Stockton (12 miles south)
- 13521 East Mariposa, Stockton (20 miles south-southeast)
- 1593 East Hazelton Street, Stockton (14 miles south)
- 8778 Brattle Place, Stockton (12 miles southwest)
- 24371 Patterson Pass Road, Tracy (45 miles south-southwest)

The Stockton-Wagner-Holt School monitoring station on Brattle Place is closest to the city, but only monitors particulate matter. The closest monitoring station to Lodi that monitors ozone is the Hazelton Street station in Stockton.

Ozone

For ozone, no clear increasing or decreasing trend is discernable for the Stockton-Lodi area in the past five years, though it appears ozone levels may have increased in 1998 and 1999 and then decreased again (Table 3.1-3). At the Hazelton Street station, average ozone levels decreased during the mid-1990s and then increased again at the end of the decade (Figure 3.1-1). The ozone levels in the wider SJVAB, however, have shown improvement over time, with fewer federal

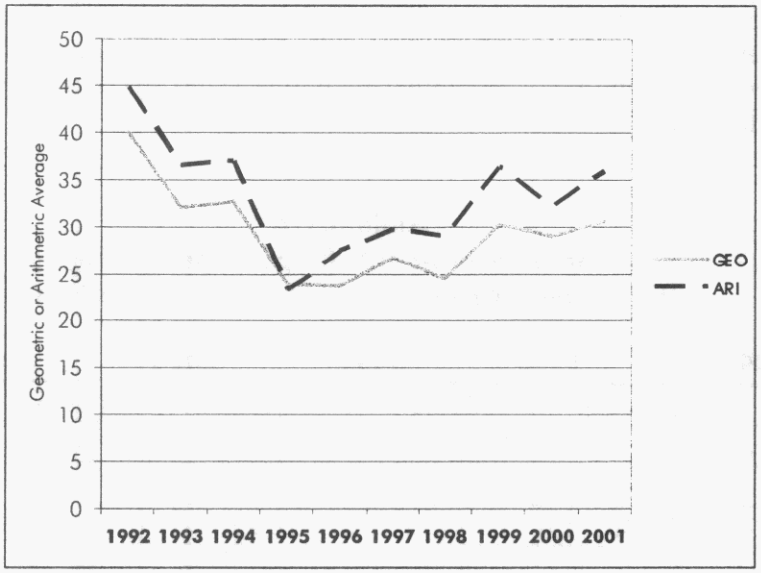
exceedance days, and a slight reduction in the number of State exceedance days (Figure 3.1-2). The SJVAB has shown less improvement in ozone air quality than coastal areas nearby due to higher rates of growth.[3]

Table 3.1-3
Ozone Measurements (in parts per million)
Hazelton Street Station

	1997		1998		1999		2000		2001		2002*	
Highest	Aug. 7	0.102	Aug. 4	0.126	Aug. 25	0.144	Aug. 2	0.107	June 16	0.103	No Date	0.10
2nd Highest	Sept. 23	0.092	Aug. 5	0.105	July 11	0.130	Oct. 1	0.104	June 15	0.101	n/a	n/a
3rd Highest	Aug. 8	.090	Sept. 4	0.104	Oct. 10	0.107	July 29	0.095	June 22	0.100	n/a	n/a
4th Highest	Sept. 28	0.090	Sept. 7	0.104	July 10	0.105	Aug. 1	0.095	June 21	0.096	n/a	n/a
CA days	1		10		6		4		5		2	
Fed days	0		1		2		0		0		0	

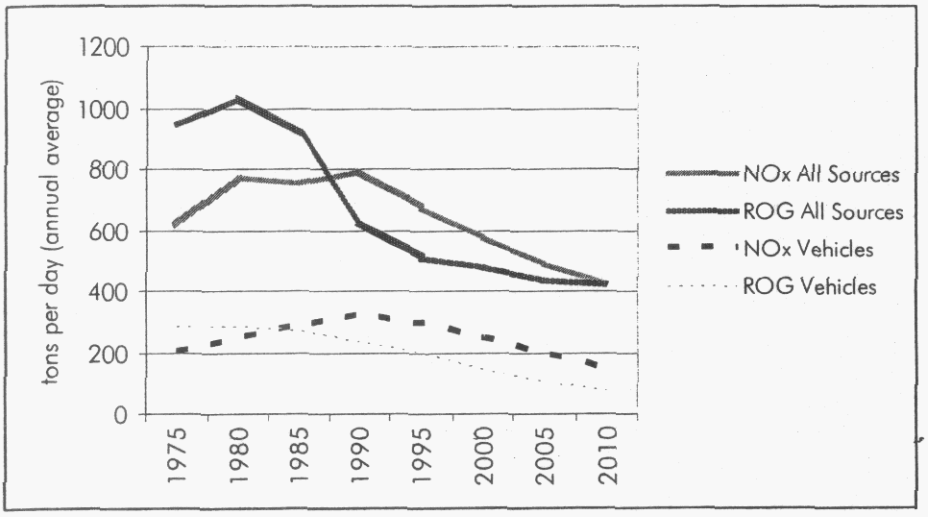
Note: *2002 data is classified on the ARB web site as being "preliminary." n/a = not available.
Source: California Air Resources Board web site.

Figure 3.1-1
Average Ozone Levels at the Hazelton Street Monitoring Station, 1992-2001



Source: Air Resources Board; Cotton/Bridges/Associates, 2003.
Note: Annual geometric and arithmetic averages are based on the highest 24-hour observations collected each day throughout the year. The California annual average standard is exceeded when the annual geometric average is greater than 30 micrograms per cubic meter. The national annual average standard is exceeded when the average of three consecutive annual arithmetic averages is greater than 50 micrograms per cubic meter.

Figure 3.1-2
Ozone Precursor Trends in San Joaquin Valley Air Basin



Source: California Air Resources Board, 2002; Cotton/Bridges/Associates, 2003.

The Elk Grove-Bruceville Road monitoring station in Sacramento County monitors ozone and is located approximately 20 miles north of Lodi (Table 3.1-4). The ozone levels at this monitoring station were similar to those measured at the Hazelton Street Station, with a spike in 1998 and 1999 and then some reduction in ozone concentrations during the four worst days and a lack of days where concentrations exceeded the federal standard. The Elk Grove station, however, had 10 days in 2001 where concentrations exceeded California standards, compared to only five at the Hazelton Street Station in Stockton.

Table 3.1-4
Ozone Measurements (in parts per million)
Elk Grove-Bruceville Road Monitoring Station

	1997		1998		1999		2000		2001		2002	
Highest	Aug. 7	0.121	Aug. 4	0.147	Aug. 25	0.160	Sept. 30	0.104	June 22	0.103	July 10	0.096
2nd Highest	Aug. 6	0.101	Aug. 11	0.110	July 10	0.118	Oct. 1	0.099	June 15	0.101	July 9	0.087
3rd Highest	June 19	.0999	Aug. 29	0.102	Aug. 24	0.112	Sept. 20	0.097	July 3	0.100	July 12	0.085
4th Highest	Sept. 23	0.096	Aug. 13	0.101	Oct. 1	0.111	Sept. 12	0.092	June 16	0.096	Aug. 10	0.082
CA days	5		7		16		3		10		1	
Fed days	0		1		1		0		0		0	

Source: California Air Resources Board web site.

Particulate matter became more of a problem for the Lodi area between 1997 and 2001 – annual average particulate matter levels steadily increased since 1996 at the Stockton-Wagner-Holt School

monitoring station (Table 3.1-5). Particulate matter concentrations may have increased between 1997 and 1999, decreased in 2000, and then increased again in the area around the Hazelton Street monitoring station (Table 3.1-6).

Table 3.1-5
PM_{10} Statistics (in micrograms per cubic meter)
Stockton-Wagner-Holt School Station

	1997		1998		1999*		2000		2001	
High	Dec. 31	130	Dec. 31	99	Dec. 20	104	Nov. 20	104	Jan. 1	119
2nd High	Feb. 15	63	Dec. 13	80	Dec. 26	90	Dec. 2	76	Nov. 9	87
3rd High	Oct. 25	57	Nov. 13	75	Jan. 30	63	Dec. 20	75	Jan. 19	77
4th High	Jan. 10	55	Oct. 20	61	Dec. 14	52	Nov. 29	72	Nov. 21	77
CA days**	20		25		24		51		30	
Federal Days**	0		0		n/a		0		0	

Note: *In 1999, this station had only 52 percent coverage, whereas in the other years shown, the coverage was in the 90 to 100 percent range.
**CA and Federal days are the estimated number of days that a measurement would have been greater than the level of the standard had measurements been collected every day. The number of days above the standard is not necessarily the number of violations of the standard for the year.
Source: California Air Resources Board web site.

Table 3.1-6
PM_{10} Statistics (in micrograms per cubic meter)
Hazelton Street Station

	1997		1998		1999		2000		2001	
High	Dec. 30	98	Dec. 25	106	Oct. 21	150	Nov. 20	91	Jan. 7	140
2nd High	Jan. 10	72	Dec. 31	95	Oct. 15	123	Oct. 21	86	Nov. 9	97
3rd High	Oct. 25	69	Oct. 20	89	Dec. 20	119	Dec. 20	64	Nov. 21	77
4th High	Feb. 15	58	Dec. 13	76	Dec. 26	84	Dec. 2	62	Nov. 21	77
CA days*	26		43		60		45		60	
Federal Days*	0		0		0		0		0	

Note: *CA and Federal days are the estimated number of days that a measurement would have been greater than the level of the standard had measurements been collected every day. The number of days above the standard is not necessarily the number of violations of the standard for the year.
Source: California Air Resources Board web site.

For the San Joaquin Valley Air Basin as a whole, there has been an overall downward trend in the average annual concentrations of particulate matter, and the number of State and federal exceedance days.[4]

Air Quality Management Plans

Both California and the federal government require nonattainment areas to prepare a plan to

reduce air pollution to federal and State health levels. The San Joaquin Valley Air Basin failed to attain federal PM_{10} standards by December 31, 2001 and is therefore required to submit a new plan demonstrating for an annual reduction of PM_{10} of five percent. With the 2001 reclassification from Serious to Severe Ozone Nonattainment, the SJVUAPCD is required to prepare plans demonstrating attainment of the standard by November 15, 2005 and rate of progress plans (ROPs) demonstrating reduction of ozone precursor emissions at a rate of three percent per year, averaged over a three-year period.

Methodology

The air quality analysis and reporting contained in this EIR follows the most recent version of the SJVUAPCD document, *Guide for Assessing and Mitigating Air Quality Impacts*. The EIR follows the SJVUAPCD analysis methods recommended for general plan updates, specific plans, and general plan amendments. A similar level of detail is afforded to the Housing Element. Both direct and reasonably foreseeable indirect emissions are assessed.

The SJVUAPCD's approach to CEQA analyses of construction impacts involves implementation of effective and comprehensive control measures rather than to require detailed quantification of emissions.

The entire Housing Element Update is incorporated by reference to this EIR. Implementation of the majority of the programs included within the Housing Element Update will not result in potential environmental effects. For the purposes of this section of the EIR, only those policies, goals, and/or programs that may result in environmental effects related to air quality have been analyzed. Mitigation measures included in the General Plan EIR that would reduce impacts to air quality are not altered by the Housing Element or the Housing Element EIR and are considered as a part of the impact analysis in this section. The following excerpt includes all relevant Housing Element policies and programs (including policies and programs that would reduce potential air quality impacts:

Goal A: **To provide a range of housing types and densities for all economic segments of the community while emphasizing high quality development, homeownership opportunities, and the efficient use of land.**

1. The City shall promote the development of a broad mix of housing types through the following mix of residential land uses: 65 percent low density, 10 percent medium density, and 25 percent high density.

2. The City shall regulate the number of housing units approved each year to maintain a population-based annual residential growth rate of 2.0 percent, consistent with the recommendations of the Mayor's Task Force and the growth management ordinance.

3. The City shall continue to exempt senior citizen housing projects from the growth management ordinance.

4. The City shall exempt very low- and/or low-income housing units from the growth management ordinance if necessary to meet the City's share of regional housing needs, as required by state law.

10. The City shall seek to intersperse very low- and low-income housing units within new residential developments and shall ensure that such housing is visually indistinguishable from market-rate units.

13. The City shall encourage infill residential development and higher residential densities within the existing City limits near transit stops, and compact development patterns in annexation areas to reduce public facility and service costs, avoid the premature conversion of natural resource and agricultural lands, and reduce the number of trips from private vehicles.

Program 1: Zoning Ordinance Revisions

The City shall revise Title 17 of the Lodi Municipal Code (Zoning Ordinance) to reduce barriers to, and provide incentives for, the construction and conservation of a variety of housing types. Revisions to Title 17 will include the following:

a. The addition of a chapter that provides for density bonuses and other incentives for projects that include ten percent very low-income housing, 20 percent low-income housing, 50 percent qualifying senior housing, or 20 percent moderate-income hosing in condominium conversion projects, in compliance with Sections 65915 – 65918 of the California Government Code. The City shall work with the San Joaquin County Housing Authority in developing procedures and guidelines for establishing income eligibility for the "reserved" units and for maintaining the "reserved" units as affordable units for at least 30 years. The City shall seek Housing Authority administration of the reserved units. The City shall establish a program to publicize the availability of the density bonus program through the City's website, program information at the Community Development Department public counter, and pre-development meetings with housing providers (such as the housing unit allocation stage). The City shall encourage prospective housing developers to use the density bonus program at pre-development meetings. In conjunction with density bonuses, the City will offer one or more regulatory incentives, as needed and appropriate, such as:

    - Reduced parking for projects oriented to special needs groups and/or located close to public transportation and commercial services;
    - Expedited permit processing; or
    - Deferral of fees for an appropriate time period to allow for the project to begin generating income.

b. Conformance with California Government Code sections 65852.3 and 65852.7, which require that manufactured homes in single-family zones on permanent foundations be permitted under the same standards as site-built homes (with limited exceptions) and that mobilehome parks be permitted in any residential zone (although the City may require a use permit).

c. Addition of standards for emergency shelters and transitional housing to clearly identify appropriate zoning districts and locations for such facilities and to make these sites readily accessible. Until the adoption of such revisions to the Zoning Ordinance, the City will continue to allow by right the development of such facilities in areas zoned C-M or C-2.

d. Addition of a definition of farmworker housing that does not conflict with state law definitions for employees housing (beginning with California Government Section

17000) and specification of the zoning districts and standards under which such housing will be permitted.

e. Clarification of standards for permitting residential care facilities (such as group homes). The City will specify that all such facilities with six or fewer residents are permitted in residential zoning districts. The City will also designated zoning districts in which facilities of seven or more persons will be permitted through a use permit and standards for such facilities.

f. Revision of off-street parking requirements (Chapter 17.60) to allow for less than two spaces per multifamily dwelling unit with fewer than two bedrooms when justified due to the characteristics of the occupants (such as seniors, persons with disabilities, or low-income single working adults) and/or the project location (such as along a public transit route or in the downtown area).

g. Revision of standards for second dwelling units to allow the conversion of accessory buildings to second units subject to compliance with all other zoning and parking standards, an appropriate minimum lot size for detached second units, and architectural compatibility with the main dwelling unit. The City will permit second dwelling units through an administrative permit process in compliance with state law (California Government Code section 65852.2).

h. Elimination of single-family homes as permitted uses in the R-GA, R-MD, R-HD, and R-C-P zones, except on parcels constrained by lot size, environmental, or other factors that would make the construction of multifamily housing infeasible.

i. Reduction in the number of non-residential uses permitted in multifamily residential zones to public and quasi-public uses and supportive services for multifamily residents.

Responsibility: Community Development Department, Planning Commission, City Council
Timeframe: Complete zoning code amendments as part of a new unified development code by June 2004.
Funding: General Fund
Objective: Reduce regulatory barriers to the provision of housing

Program 2: Revise Growth Management Program

The City will revise its growth management program to exempt housing units affordable to very low- or low-income households with long-term affordability restrictions.

Responsibility: Community Development Department
Timeframe: Begin second round of allocations, if needed, in 2005 and annually thereafter
Funding: Application fees
Objective: Expedite the residential development approval process

Program 4: Land Inventory

The City shall prepare and maintain a current inventory of vacant, residentially zoned parcels and a list of approved residential projects, and shall make this information available to the public and developers, including information on underutilized sites within the downtown area with residential or mixed-use development potential. The City shall update the inventory and list at least annually. The City will promote the land inventory and the availability of each

update through the City's web site, a notice at the Community Development Permit Counter, and a press release subsequent to each update.

To encourage the maximum efficient use of land within the current City limits, Lodi will also conduct a study of residential development potential on underutilized industrial and commercial sites along Cherokee Lane, South Sacramento Street, South Stockton Street, and West Kettleman Lane. Properties along these corridors may be suitable for future residential development if sufficient land can be consolidated to make such development feasible (see Figures 2-3 through 2-5, which follow). These areas are characterized by obsolete patterns of land development, older structures in substandard condition, odd-sized lots, and marginally viable commercial and industrial uses that would make properties ripe for redevelopment in the next five to ten years. If Lodi determines that residential development is feasible along these streets, the City will initiate a planning process with property owners (which may be a special area plan or a specific plan meeting state law requirements) to define specific properties suitable for residential or mixed-use development, appropriate development standards, and improvements needed to support residential development.

Responsibility:	*Community Development Department, Planning Commission, City Council*
Timeframe:	Complete study of residential development potential by December 2006; prepare and adopt area plan(s) by December 2009.
Funding:	General Fund, contributions from property owners
Objective:	Increase the potential for infill development, thereby reducing the need to prematurely annex land and convert agricultural land to urban use

Program 6: Encourage Efficient Use of Land for Residential Development

The City will investigate incentive and regulatory tools to encourage efficient use of land designated or held in reserve for urban development within the existing Lodi Sphere of Influence to reduce the premature conversion of agricultural land to urban use. If determined to be feasible, the City will adopt one or more incentives or regulations. Examples of approaches the City will study and consider are:

- A requirement to mitigate the loss of Prime Farmland through the payment of a fee. Fees collected by the City will be used to foster agricultural production in the Lodi area. This program may fund marketing, research, land acquisition and other programs necessary to promote agricultural production. An option that the City may consider to promote the production of affordable housing is to have this program tied to a sliding scale based on dwelling units per acre. If a development is at the Land Use Element mandated 65% Low Density/10% Medium Density/35% High Density, equivalent to 9.85 dwelling units per acre, then no fee would be collected, a higher density would be provided with a credit while a lower density would be subject to the fee.

- The use of transferred development rights (TDRs) that can be applied to designated areas within the Sphere of Influence. The TDRs might be combined with a density bonus program for agricultural preservation to increase the number of opportunities to use the TDRs. An option that the City of Lodi may consider is to designate sending and receiving areas. A potential sending area for the program could be approximately 0.25 miles south of Harney Lane to Armstrong Road in the area currently designated as Planned Residential Reserve by the Land Use Element of the General Plan. The receiving area for this program could then be designated to areas north of Harney Lane in the Planned Residential portion of the General Plan.

- The use of transitional land use categories, such as residential estates, to provide a further buffer between more intense urban land uses and agricultural land uses.

Responsibility: Community Development Department, Planning Commission, City Council,
Timeframe: Complete study and recommend incentives and regulations by June 2005; City Council to adopt incentives or regulations by December 2005.
Funding: General Fund
Objective: Preserve agricultural land and reduce the amount of land needed to meet future urban growth needs

Program 9: Annexation of Land to Accommodate Future Housing Needs

The City will work with property owners of approximately 600 acres outside the current City limits, but within Lodi's Sphere of Influence (SOI), to plan for, and annex the land to the City so that additional residential development opportunities can be provided to meet Lodi's future housing construction needs. The 600 acres is located between Harney Lane, Lower Sacramento Road, the Woodbridge Irrigation District canal, and the western SOI boundary. The City has facilitated a specific planning process with property owners of approximately 300 acres to prepare these sites for annexation to the City. The development potential for the properties to be annexed is summarized in Table II-1B.

The City does not need to annex all 600 acres within the next three to six years to meet housing construction needs given the backlog of unused housing allocations and available sites within the current City limits, but will initiate the process with property owners during the 2003 - 2009 period.

Responsibility: Community Development Department, Planning Commission, City Council
Timeframe: Annex initial 300 acres by December 2005; annex remaining land by December 2009.
Funding: Annexation and permit fees
Objective: Increase the City's residential development capacity to accommodate its share of the region's future housing construction needs between 2001 and 2009, and subsequent years, under the San Joaquin County Council of Governments housing allocation plan

Goal B: **To encourage the maintenance, improvement, and rehabilitation of the City's existing housing stock and residential neighborhoods, particularly in the Eastside area.**

1. The City shall encourage private reinvestment in older residential neighborhoods and private rehabilitation of housing.

2. The City shall use available and appropriate state and federal funding programs and collaborate with nonprofit organizations to rehabilitate housing and improve older neighborhoods.

3. The City shall support the revitalization of older neighborhoods by keeping streets and other municipal systems in good repair.

4. The City shall allow reconstruction of existing housing in the Eastside area and in commercially or industrially designated areas in the event such housing is destroyed or damaged.

5. The City shall implement historic preservation guidelines to preserve historically significant residential structures and insure that infill projects fit within the context of the neighborhood. (See the Urban Design and Cultural Resources Element for implementation of this policy.)

GOAL C: To ensure the provision of adequate public facilities and services to support existing and future residential development.

Program 21: Growth Management Program

The City will continue to use its growth management program to insure that the pace of development is consistent with the City's, the Lodi Unified School District's, and other public facility and service providers' abilities to provide public facilities and services and maintain minimum facility and service standards for the entire community. The City will contact other public facility and service providers annually during the housing unit allocation process to insure that these agencies can serve the increased number of housing units to be allocated.

Responsibility: Community Development Department, Planning Commission, City Council
Timeframe: Annually during housing allocation process, 2003 - 2009
Funding: Application fees, development impact fees
Objective: To provide public facilities and services meeting minimum City standards

Goal E: To encourage residential energy efficiency and reductions in residential energy use.

Policies

1. The City shall require the use of energy conservation features in the design and construction of all new residential structures and shall promote the use of energy conservation and weatherization features in existing homes.

2. The City shall require solar access in the design of all residential projects.

3. The City shall pursue residential land use and site planning policies, and promote planning and design techniques, that encourage reductions in residential energy consumption.

Program 29: Energy Efficiency and Weatherization Improvements for Older Homes

The City shall continue to permit energy conservation and weatherization improvements as eligible activities under the Lodi Housing Rehabilitation Program. The City will post and distribute information on currently available weatherization and energy conservation programs operated by the City, nonprofit organizations, and utility companies through the Lodi website, the Community Development Department public counter, the Lodi Public Library, the Loel Senior Center, and other public locations.

Responsibility: Community Development Department
Timeframe: Current and ongoing, 2003 - 2009
Funding: CDBG, HOME, public and private utilities, nonprofit organizations
Objective: To increase energy efficiency in older homes

Program 30: Energy Conservation for New Homes

The City shall enforce state requirements for energy conservation, including Title 24 of the California Code or Regulations (state building code standards), in new residential projects and encourage residential developers to employ additional energy conservation measures in the design of new residential developments with respect to the following:

- Siting of buildings
- Landscaping
- Solar access
- Subdivision design

Responsibility: Community Development Department
Timeframe: Current and ongoing, 2003 - 2009 as part of review of planning and building permit applications
Funding: Permit fees
Objective: To increase energy efficiency in the design and construction of new homes

Thresholds of Significance

Based on standards of significance established by the SJVUAPCD (see Table 3.1-7), the proposed Project would result in a significant air quality impact if it would:

- Have the potential to frequently expose members of the public to objectionable odors;
- Have the potential to expose sensitive receptors (including residential areas) or the general public to substantial levels of toxic air contaminants; or
- Fail to carry out appropriate controls for construction dust. (The SJVUAPCD significance threshold for construction dust impacts is based on the appropriateness of construction dust controls. The SJVUAPCD guidelines provide feasible control measures for construction emission of PM_{10} beyond that required by District regulations. If the appropriate construction controls are to be implemented, then air pollutant emissions for construction activities would be considered less than significant); or,
- Result in increased carbon monoxide and ozone precursors (ROG and NO_x);

Table 3.1-7
SJVUAPCD Thresholds of Significance

Criteria Pollutant	Threshold
Reactive Organic Gases (ROG)	10 tons per year
Oxides of Nitrogen (NO_x)	10 tons per year
Carbon Monoxide (CO)	9 parts per million (ppm) averaged over 8 hours or 20 ppm for 1 hour.

Source: SJVUAPCD, 1998.

Environmental Impact and Mitigation Measures

Impact AQ-1 Short-Term Construction Emissions

Grading, excavation, and travel on unpaved construction site roadways can generate dust, and construction equipment engines emit carbon monoxide, PM_{10}, and ozone precursors.

Construction emissions during implementation of the Housing Element could be higher compared to recent periods if Housing Element policies accommodate substantially more growth by exempting affordable or senior housing from the City's growth limitation.

With higher densities, smaller units, and less land area per unit, construction emissions would be lower on a per-unit basis, and could be lower overall than in recent years depending on the rate of infill and development. The reduction of parking requirements (Goal A, Program 1) will decrease potential construction-related emissions, especially ROG and NOx, associated with multi-family development. Construction-related emissions would also occur if construction occurred on lands annexed to the City to accommodate residential development.

SJVUAPCD Regulation VIII, Fugitive Dust Control Measures, is meant to reduce PM_{10} generated from man-made dust sources. Compliance with this regulation is required under existing regulatory conditions. Enhanced and Additional Control Measures are also available from the Air District that provides a greater degree of PM_{10} reduction than Regulation VIII. The SJVUAPCD recommends implementing all feasible control measures as a part of development projects. Short-term construction emissions are **potentially significant** and requires mitigation.

Mitigation Measure AQ-1:

The City shall coordinate with the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) to assess and properly mitigate short-term construction related air pollution. For projects over which the City has some discretionary authority, the City shall require the following mitigation measures, where applicable, or measures deemed to be similarly effective in reducing short-term construction related emissions of PM_{10}, carbon monoxide, and ozone precursors:

- **Limit traffic speeds on unpaved roads to 15 mph; and**
- **Install sandbags or other erosion control measures to prevent silt runoff to public roadways from sites with a slope greater than one percent.**

The following control measures are strongly encouraged at construction sites that are large in area, located near sensitive receptors, or which for any other reason warrant additional emissions reductions:

- **Install wheel washers for all exiting trucks, or wash off all trucks and equipment leaving the site;**
- **Install wind breaks at windward side(s) of construction areas;**
- **Suspend excavation and grading activity when winds exceed 20 mph; and**
- **Limit area subject to excavation, grading, and other construction activity at any one time.**

Construction Equipment Mitigation Measures for Heavy duty equipment (scrapers, graders, trenchers, earth movers, etc.):

- **Use of alternative fueled construction equipment**
- **Minimize idling time (e.g., 10 minute maximum)**
- **Limit the hours of operation of heavy duty equipment and/or the amount of equipment in use**
- **Replace fossil-fueled equipment with electrically driven equivalents (provided they are not run via a portable generator set)**
- **Curtail construction during periods of high ambient pollutant concentrations; this may include ceasing of construction activity during the peak-hour of vehicular traffic on adjacent roadways**
- **Implement activity management (e.g. rescheduling activities to reduce short-term impacts)**

With incorporation of the identified mitigation, the impact is considered **less than significant**.

Impact AQ-2 Exposure to, or Creation of, Toxic Emissions

Urban development of lands to the south and west of the city could expose future residents to toxic air pollutant emissions associated with ongoing agricultural operations. Certain types of crops and certain methods of agricultural operations involve application of chemicals for fertilization, suppression of insects, and control of unwanted plants. Some of these chemicals could become airborne and affect nearby residents.

Infill residential development may place future Lodi residents in relatively close proximity to existing industrial or commercial sources of harmful air pollutant emissions. These are **potentially significant** impacts that require mitigation.

Mitigation Measure AQ-2

The City in preparing environmental documents for proposed residential development near agricultural lands or near operational industrial/manufacturing facilities, shall consider impacts related to exposure of residential development to airborne hazardous air pollutants. A risk assessment shall be conducted, where necessary, to support environmental documentation. The City shall coordinate with the State Department of Toxic Substances Control and the San Joaquin Valley Unified Air Pollution Control District and implement recommendations of these agencies as a part of future residential projects deemed to be at risk of exposure to sources of hazardous air pollutants. Based on this environmental analysis the City shall either:

- **Ensure that the proposed project is located away from sources of airborne pollution;**
- **Ensure that the proposed project is not located downwind of significant point sources of air pollution such as smoke stacks and agricultural fields where chemicals are used; and/or,**
- **Require buffers of other compatible uses of adequate width between residential areas and sources of pollution.**

With the incorporation of identified mitigation, the impact is considered **less than significant**.

Impact AQ-3 Long-Term Operational Emissions

Long-term operational air pollutant emissions are those associated with the function of projects developed under, or accommodated by the Housing Element. Housing Element policies do not affect manufacturing or other land uses associated with emission of substantial air pollutant emissions (except the possibility of encouraging vacant or underutilized lands to be removed from industrial or commercial operation – Programs 4 and 6). Long-term air quality impacts are primarily associated with *indirect* impacts of residential development such as:

- Additional vehicle traffic;
- Operation of landscape maintenance equipment;
- Power generation to supply electricity;
- Fireplaces and other indoor climate control; and,
- Other activities with less substantial air quality consequences.

The Housing Element includes exemptions to the growth ordinance for affordable housing and senior housing. The extent to which housing developers would take advantage of this new growth management limit exemption is unknown. However, this program could increase the number of housing units that could constructed or occupied in any given year, and ultimately increase the level of air pollution attributable to construction. The effect of this exemption on the overall population of Lodi is also difficult to estimate, but the program could increase long-term air pollutant emissions, to the extent that pollution is related to residential population increases. Density bonuses and second unit programs increase the number of units that can be developed per land area of the city, and air pollution attributable to the use of housing units. Land inventory and infill programs could result in a higher population density in developed areas of the city, and may lead to transportation related air quality problems if adequate circulation infrastructure is not provided. Annexation of land for urban development would result in additional automobile trips, fireplaces, energy needs, all aspects of residential development that impact air quality.

Several goals, policies, and programs included in the Housing Element would have a mitigating effect on long-term air quality impacts that might otherwise occur. Senior and special needs housing is encouraged near services and public transportation, which could reduce dependence on automobiles, the major source of air pollution from new development in this portion of the SJVAB. Infill residential development, which also places residences in closer proximity to jobs and services, may also reduce dependence on the automobile. There are various goals, policies, and programs intended to encourage higher density residential development, creating land use patterns that support transit and other alternative travel modes. Programs ensuring adequate transportation and transit facilities will reduce potential congestion and automobile related air pollutant emissions. Finally, the Housing Element specifies goals and programs related to residential efficiency, which would reduce air pollution associated with off-site electricity generation. The City's General Plan Circulation Element Goals C, D, E, G, I, and the associated policies also establish the City's desire to reduce automobile trips and promote alternatives to this mode of transportation.

The SJVUAPCD's *Air Quality Guidelines for General Plans* (AQGGP) identifies goals, policies, and implementation strategies for use in land use planning documents. The Air District recommendations focus on automobile use, which typically account for 90 percent or more of total emissions attributable to new commercial and residential projects.[5] Housing Element programs that

encourage increased density and infill development are consistent with some of the factors that could reduce non-work automobile trips, as cited by SJVUAPCD and the California Air Resources Board:[6,7]

- Residential and commercial developments must be of sufficient density to support transit service;
- Neighborhoods must be sufficiently compact to encourage walking and biking for errands, socializing, etc;
- Houses, jobs, and services should be located close enough together to allow walking and biking for at least some trips;
- The circulation network and the design of individual streets should provide a safe and attractive environment for bicyclists and pedestrians;
- The community should have a rough balance between the number of jobs and the number of employed residents;
- Increase density near transit corridors;
- Increase density near transit stations;
- Encourage mixed-use development;
- Encourage infill and densification;
- Develop concentrated activity centers;
- Strengthen downtowns;
- Develop interconnected street network; and,
- Provide strategic parking facilities.

Some Housing Element components may have adverse long-term operational air quality impacts while other components may reduce operational emissions in the short and/or long term compared to continued growth with recent development patterns. Future housing projects will be subjected to CEQA review and mitigation. Overall, the impact is considered **less than significant**.

Impact AQ-4 Exposure to, or Creation of, Carbon Monoxide Hotspots

Traffic congestion can create localized concentrations of carbon monoxide, otherwise known as hot spots. The federal and State governments created standards for carbon monoxide concentrations that, if not exceeded, would ensure no public health risk. The housing element is intended to encourage a more efficient use of land as well as infill development, which could strain public infrastructure, including roadways. If an intersection operating at satisfactory level of service becomes congested (LOS E or F) during peak demand as a result of housing development, this congestion (depending on the location of nearby sensitive receptors, the mix of vehicle types, the level of delay, the surrounding topography and wind patterns, the ambient concentration of carbon monoxide, and other factors) could cause one or more hot spots.

Increased density in areas with existing transit service and with a mix of land uses would make walking, bicycling, and use of transit more attractive and convenient, thus reducing the demand on local roadways, consistent with General Plan Circulation Element Goals C, E, and G.

Introduction of additional residential development into areas of the city with congested roadways may increase congestion and associated pollutant concentrations. As future housing projects are

proposed throughout the Lodi, they are required to analyze the site specific, development specific traffic congestion impacts and mitigate, wherever feasible. Levels of service for affected intersections and roadway segments would be analyzed under pre- and post-project conditions and cumulative conditions. Wherever the housing project contributed to an unacceptable level of service (LOS E or F), the project would be required to provide signalization, additional lanes, intersection improvements, or other solutions to reduce travel demand and/or increase roadway capacity.

In some built out areas of the city, if additional housing development or additional density is accommodated through future housing projects, typical automobile traffic mitigation may not be feasible or appropriate to relieve peak hour congestion. Additional right-of-way may be difficult to acquire. These potential problems were anticipated in the Circulation Element (Goal A, Policy 4), which indicates that meeting City congestion standards in redeveloping areas may be infeasible or undesirable. The Housing Element encourages redevelopment and infill development. This may place housing in areas where existing or future congestion levels may create carbon monoxide hot spots. In some areas, roadway improvements to reduce peak hour congestion may not be feasible or desirable. This is a **significant and unavoidable impact**.

Impact AQ-5 Consistency with Air Quality Management Plans

SJVUAPCD Attainment Plans regulate the creation and emission of non-attainment pollutants within the Project area. To ensure that short-term and long-term impacts of development are sufficiently addressed, the District created and adopted these plans, which assume that development throughout the region will occur based on local and regional growth projections, and contain standards for emissions based on these projections. A project is considered to be in compliance with the Attainment Plans if it does not exceed the thresholds and does not contribute a significant percentage of the California Ambient Air Quality Standards.

Annexation areas identified in the Housing Element are within the City's current Sphere of Influence, and annexation and development of these properties, as well as development of affordable and senior housing under an exemption to the residential growth limits would only occur if necessary to meet the regional housing needs allocation (Program 2 and Program 9).

The City's General Plan establishes a growth management program implemented by the City through Ordinance 1521, which regulates residential growth to two percent per year through 2007 and designates residential land sufficient to meet the City's needs. To ensure a two percent growth rate per year, Lodi established a residential permit allocation system. The residential allocation system establishes the number of units that can be permitted on a yearly basis within the established two percent limit of Ordinance 1521. The system is applied to all residential projects of five dwellings or more, except senior housing developments. Unused allocations may roll over into subsequent years without limit. Even though the growth management program establishes an upper limit to growth, in recent years, residential development has not approached the two percent limit and there are approximately 3,000 unused allocations.

The San Joaquin County Regional Transportation Plan and the applicable air quality attainment plans for PM10 and ozone are based on San Joaquin Council of Governments (SJCOG) projections, without consideration of any local growth control ordinances. The Housing Element does not

include any measures that would accommodate or encourage population growth beyond SJCOG population projections. No specific housing projects are identified in the Housing Element. The impact is considered **less than significant**.

Notes and References

1 San Joaquin Valley Unified Air Pollution Control District. *Guide for Assessing and Mitigating Air Quality Impacts. August, 1998 (revised June 1999).*
2 San Joaquin Valley Unified Air Pollution Control District. *An Extreme Choice.* www.valleyair.org.
3 California Air Resources Board. *California Air Quality Almanac.* 2002.
4 Ibid. Page 43.
5 San Joaquin Valley Unified Air Pollution Control District. *Guide for Assessing and Mitigating Air Quality Impacts.* August, 1998 (revised June 1999).
6 Ibid. Page 56.
7 California Air Resources Board. *Transportation-Related Land Use Strategies to Minimize Motor Vehicle Emissions: An Indirect Source Research Study.* 1995.

3.2 Biological Resources

This section provides a general description of the important biological features of Lodi, including plants, animals, special-status species, and wetlands. The information and analysis in this section draw heavily from existing documents, including the *Lodi General Plan EIR* (1988), *Lodi General Plan Background Report* (1990), and the *Lodi Redevelopment Plan EIR* (2002). Each of these reports is available for review at the Lodi City Hall.

Environmental Setting

The Project area is characterized by a variety of natural and altered habitats, ranging from fully urbanized areas to natural river channels. Seven habitat types have been identified within the city and Sphere of Influence[1], with multiple plant and animal species of interest to local, State, and federal agencies. Some sensitive habitat areas, including the Lodi Lake Nature Area, are already protected from development under existing ordinances and plans.

Of the seven habitat types found in the city and SOI, four are manmade and three are natural. The seven habitat types are described below. Refer to the *Lodi General Plan EIR Background Report* for a full explanation of each habitat type and their locations within the community.

River Channels:
River channels provide habitat for a number of aquatic and land species, and are essential to adjacent wetland communities which feed from the river channels. The major river in Lodi, Mokelumne River, has its water levels controlled by releases from the Comanche Reservoir and the Woodbridge diversion dam. Chinook salmon and steelhead are the major species of concern in this habitat type within Lodi.

Ponds and Marshes:
This habitat type, including freshwater marshes, is considered valuable due to its relative scarcity in the Central Valley and its ability to provide habitat for a rich variety of species. Locations of ponds and marshes are primarily within the Lodi Lake Nature Area, although scattered sites also exist along the Mokelumne River and along ditches and drainage areas. Potential sensitive species that can reside or utilize such habitat include endangered, threatened, and special-status raptors, migratory birds, snakes, and rodents.

Riparian Stands:
Riparian stands include vegetated tree and shrub communities occurring along waterways, providing habitat for plants and animals, stabilizing river banks, and serving as a natural filter for contaminants carried by urban runoff toward adjacent waterways. Various endangered, threatened, and special-status species can reside in this habitat, and riparian stands are known to support a greater diversity of species than any other habitat type in the area. Although once abundant in the area, this habitat type currently exists only along portions of the Mokelumne River within the Project area, generally within the Lodi Lake Nature area and immediately west thereof.

Old Fields:
Old Fields habitat represents the state of land following abandonment of urban or agricultural use. Abandoned lands once developed with urban or agricultural uses will transition into a natural-type habitat, but during such transition are known as old field habitat. Vegetation in this habitat is typified by ruderal species, generally hardy and aggressive, than can colonize vacated lands quickly and efficiently. Wildlife species supported by this habitat are similar to those in agricultural areas. This habitat type is found throughout the city, although the majority is located on the periphery of the urbanized area.

Fence Rows:
This habitat type occurs along the undeveloped edges of agricultural areas, or along previously-disturbed sites no longer in urban or agricultural use. Trees and scattered vegetation can occur in these areas, providing supporting habitat for sensitive plant and animal communities. This habitat is most abundant in rural areas, although scattered portions exist throughout urban areas as well. Tremendous variety exists in these habitats, depending on the size, location, former use, and surrounding land uses of the site.

Agricultural Areas:
Agricultural areas consist primarily of cultivated fields, vineyards, orchards, and irrigated pastures. Common crops grown in Lodi and surrounding areas include tomatoes, grapes, apples, leafy vegetables, cherries, and assorted nuts. Livestock farming is also known to occur. Species supported by this habitat type very greatly according to the type of crop grown on the land and the types and extent of chemical (pesticide and herbicide) use on the property. This habitat type is the dominant type found in non-urban areas, and throughout the Sphere of Influence.

Urban Areas:
This habitat type includes physically developed areas typified by pavement, structures, and other site disturbances. This includes residential, commercial, and industrial areas. Non-native landscaping is the most common plant type here, and the urban environment is not generally considered supportive of endangered, threatened, or special-status species of plants or animals. While not considered ideal habitat for any such species, it is possible that such species can utilize urban areas for foraging, nesting, or mating. This habitat type is common throughout the city.

Uses within the Project area range from urban to agricultural to natural, with most areas inside the City limits characterized by urban development. Agricultural and preserved open space areas exist within the Sphere of Influence, serving as residence and foraging habitat for a range of species.

Previous Studies

The Project area considered in this EIR is the same as was considered in the *Lodi General Plan EIR* in 1988. This previous report assessed potential environmental impacts to biological resources within the Planning area resulting from planned urban development of Lodi.

In addition to the General Plan EIR and its corresponding Background Report, multiple EIRs have been prepared within the city addressing biological impacts. Most recently, the Lodi Redevelopment Agency prepared an EIR for the Lodi Redevelopment Plan, adopted in 2002. This EIR considered impacts to biological resources throughout the redevelopment area, which includes

1,184 acres of land within the city limits. Both EIRs provided analyses of potential impacts to plant and animal species resulting from urban development in the Project area.

Regulatory Background

The following section describes relevant federal and State regulations governing biological resources that could be applicable to development within the Project area. Specific agencies and applicable laws depend on the type of habitat affected and the type of development proposed.

Special-Status Species Regulation

Federal Endangered Species Act

The Endangered Species Act (ESA) requires that projects ensure their actions do not jeopardize the continued existence of species listed as endangered or threatened or result in the destruction or adverse modification of the critical habitat of these species.

California Endangered Species Act

The California Department of Fish and Game (CDFG) is responsible for protection and conservation of fish and wildlife resources in California. Under the California Endangered Species Act of 1984 (CESA), CDFG is responsible for ensuring that projects do not adversely affect a species listed as endangered or threatened under the California ESA (Section 2090 of the Fish and Game Code).

The State and federal Endangered Species Acts are intended to operate in conjunction with the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA) to help protect the ecosystems upon which endangered and threatened species depend. The United States Fish and Wildlife Service (USFWS) is responsible for implementation of the federal ESA, while CDFG implements the California ESA.

Native Plant Protection Act

The legal protection afforded listed plants under the Native Plant Protection Act involves provisions that prohibit the taking of plants from the wild and a salvage requirement for landowners. Once they have been notified of the presence of a listed species on their property, landowners are required to inform CDFG at least ten days prior to any land use change. This allows for the salvaging of plants that would otherwise be destroyed.

California Environmental Quality Act

In addition to formal listing under FESA and CESA, plant and wildlife species receive additional consideration during the CEQA process. Species that may be considered for review are included on a list of "Species of Special Concern," developed by the CDFG. It tracks species in California whose numbers, reproductive success, or habitat may be threatened. This EIR considers Species of Special Concern, in compliance with CEQA requirements.

Migratory Bird Treaty Act / Fish and Game Code

Raptors (birds of prey), migratory birds, and other avian species are protected by both State and federal laws. Disturbance to nesting raptors is prohibited by Section 3503 of the California Fish and Game Code and by the federal Migratory Bird Treaty Act (MBTA). Section 3503.5 of the California Fish and Game Code states that it is "unlawful to take, possess, or destroy any birds in the order Falconiformes or Strigiformes or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto."

The federal MBTA also states that it is "unlawful to take any migratory bird listed in 50 CFR (10), including nests, eggs, or products." It prohibits the killing, possessing, or trading of migratory birds except in accordance with regulations prescribed by the Secretary of Interior. Disturbance that causes nest abandonment is considered "taking", and is prohibited.

San Joaquin County Habitat Conservation Plan

San Joaquin County maintains a Habitat Conservation Plan (HCP) which provides protection for sensitive habitat areas within the County. The San Joaquin Council of Governments[2] and the consultant who prepared the HCP have indicated that the HCP is based on an assumption that areas planned for urban uses will be developed to 100 percent levels. Thus, the HCP assumed that development of a parcel would result in its elimination as potential habitat for species of concern. The HCP considered that all areas within the city limits and in the sphere of influence will develop with urban uses, and considered that all lands within the existing city limits and SOI will lose any value as habitat for species of plants and animals.

Wetlands Regulation

Section 404 of the Clean Water Act

The U.S. Army Corps of Engineers (Corps) regulates discharge of dredged or fill material into waters of the United States, including wetlands, under Section 404 of the Clean Water Act (CWA). "Discharge of fill material" is defined as the addition of fill material into waters of the U.S., including, but not limited to, the following: placement of fill that is necessary for the construction of any structure, or impoundment requiring rock, sand, dirt, or other material for its construction; site-development fills for recreational, industrial, commercial, residential, and other uses; causeways or road fills; fill for intake and outfall pipes and subaqueous utility lines [33 C.F.R. §328.2(f)].

Waters of the U.S. include a range of wet environments such as lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, and wet meadows. Boundaries between jurisdictional waters and uplands are determined in a variety of ways depending on which type of waters is present. Methods for delineating wetlands and non-tidal waters are described below.

Wetlands are defined as "those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support and under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions" [33 C.F.R. §328.3(b)].

Presently, to be a wetland, a site must exhibit three wetland criteria: hydrophytic vegetation, hydric soils, and wetland hydrology existing under the "normal circumstances" for the site.

The lateral extent of non-tidal waters is determined by delineating the ordinary high water mark (OHWM) [33 C.F.R. §328.4(c)(1)]. The OHWM is defined by the Corps as "that line on shore established by the fluctuations of water and indicated by physical character of the soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas" [33 C.F.R. §328.3(e)].

Section 401 of the Clean Water Act

In addition, Section 401 of the CWA (33 U.S.C. 1341) requires any applicant for a federal license or permit to conduct any activity that may result in a discharge of a pollutant (including fill material) into waters of the United States to obtain a certification that the discharge will comply with the applicable effluent limitations and water quality standards.

Section 1600 – 1607 of the California Fish and Game Code

The CDFG has jurisdiction under Section 1600 *et seq.* of the California Fish and Game Code over fish and wildlife resources of the state. Under Section 1603, a private party must notify the CDFG if a proposed project will "substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake designated by the department, or use any material from the streambeds...except when the department has been notified pursuant to Section 1601." If an existing fish or wildlife resource may be substantially adversely affected by the activity, the CDFG may propose reasonable measures that will allow protection of those resources. If these measures are agreeable to the party, they may enter into an agreement with the CDFG identifying the approved activities and associated mitigation measures.

Methodology

The entire Housing Element Update is incorporated by reference to this EIR. Implementation of the majority of the programs included within the Housing Element Update will not result in potential environmental effects. For the purposes of this section of the EIR, only those policies, goals, and/or programs that may result in environmental effects related to biological resources have been analyzed. The following excerpt includes all relevant Housing Element policies and programs, including policies 2 and 13 from Goal A, and Programs 6 and 9 of the Housing Element:

Goal A: **To provide a range of housing types and densities for all economic segments of the community while emphasizing high quality development, homeownership opportunities, and the efficient use of land.**

Policies

2. The City shall regulate the number of housing units approved each year to maintain a population-based annual residential growth rate of 2.0 percent, consistent with the recommendations of the Mayor's Task Force and the growth management ordinance.

13. The City shall encourage infill residential development and higher residential densities within the existing City limits near transit stops, and compact development patterns in annexation areas to reduce public facility and service costs, avoid the premature conversion of natural resource and agricultural lands, and reduce the number of trips from private vehicles.

Program 6: Encourage Efficient Use of Land for Residential Development

The City will investigate incentive and regulatory tools to encourage efficient use of land designated or held in reserve for urban development within the existing Lodi Sphere of Influence to reduce the premature conversion of agricultural land to urban use. If determined to be feasible, the City will adopt one or more incentives or regulations. Examples of approaches the City will study and consider are:

- A requirement to mitigate the loss of Prime Farmland through the payment of a fee. Fees collected by the City will be used to foster agricultural production in the Lodi area. This program may fund marketing, research, land acquisition and other programs necessary to promote agricultural production. An option that the City may consider to promote the production of affordable housing is to have this program tied to a sliding scale based on dwelling units per acre. If a development is at the Land Use Element mandated 65% Low Density/10% Medium Density/35% High Density, equivalent to 9.85 dwelling units per acre, then no fee would be collected, a higher density would be provided with a credit while a lower density would be subject to the fee.

- The use of transferred development rights (TDRs) that can be applied to designated areas within the Sphere of Influence. The TDRs might be combined with a density bonus program for agricultural preservation to increase the number of opportunities to use the TDRs. An option that the City of Lodi may consider is to designate sending and receiving areas. A potential sending area for the program could be approximately 0.25 miles south of Harney Lane to Armstrong Road in the area currently designated as Planned Residential Reserve by the Land Use Element of the General Plan. The receiving area for this program could then be designated to areas north of Harney Lane in the Planned Residential portion of the General Plan.

- The use of transitional land use categories, such as residential estates, to provide a further buffer between more intense urban land uses and agricultural land uses.

Responsibility:	Community Development Department, Planning Commission, City Council,
Timeframe:	Complete study and recommend incentives and regulations by June 2005; City Council to adopt incentives or regulations by December 2005.
Funding:	General Fund
Objective:	Preserve agricultural land and reduce the amount of land needed to meet future urban growth needs

Program 9: Annexation of Land to Accommodate Future Housing Needs

The City will work with property owners of approximately 600 acres outside the current City limits, but within Lodi's Sphere of Influence (SOI), to plan for, and annex the land to the City so that additional residential development opportunities can be provided to meet Lodi's future housing construction needs. The 600 acres is located between Harney Lane, Lower

Sacramento Road, the Woodbridge Irrigation District canal, and the western SOI boundary. The City has facilitated a specific planning process with property owners of approximately 300 acres to prepare these sites for annexation to the City. The development potential for the properties to be annexed is summarized in Table II-1B.

The City does not need to annex all 600 acres within the next three to six years to meet housing construction needs given the backlog of unused housing allocations and available sites within the current City limits, but will initiate the process with property owners during the 2003 - 2009 period.

Responsibility:	Community Development Department, Planning Commission, City Council
Timeframe:	Annex initial 300 acres by December 2005; annex remaining land by December 2009.
Funding:	Annexation and permit fees
Objective:	Increase the City's residential development capacity to accommodate its share of the region's future housing construction needs between 2001 and 2009, and subsequent years, under the San Joaquin County Council of Governments housing allocation plan

Thresholds of Significance

Based on CEQA and federal guidelines, the proposed Project would have a significant biological resources impact if it would:

- 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;

- 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 of U.S. Fish and Wildlife Service;

- 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;

- Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;

- Conflict with City of Lodi General Plan policies or City ordinances protecting biological resources; or

- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.

Environmental Impact and Mitigation Measures

Impact BIO-1 Potential Impact on Sensitive Biological Habitats

The Project includes changes to the housing policy of the City, including increases in density in some urban areas, and various growth policies that could affect locations and timing of residential growth. In addition, policies encourage preservation of transition areas and other open space areas. The pace of growth called for in the Housing Element will affect outward expansion and impact sensitive habitat or foraging areas for regulated species of plants/animals. All four elements of Program 6 would affect biological resources with regard to this potential impact. The location of the land uses or agricultural areas preserved would likely be habitat for plant or animal species, and there is potential for fragmentation or removal of sensitive habitat.

Mitigation measures were adopted in previous City environmental documents, including the General Plan EIR, which help to mitigate this impact. The General Plan Conservation Element includes policies and implementation programs designed to mitigate impacts to special-status species, sensitive habitat areas, biological diversity, and water quality impacts. These mitigation measures and General Plan policies were found to reduce impacts of urban development on biological resources in the area to a level of less than significant. Relevant policies for biological resource protection are provided below.

Policy E-1
The City shall protect the river channel, pond and marsh, and riparian vegetation and wildlife communities and habitats in the Mokelumne River and floodplain areas.

Policy E-2
The City shall prohibit the removal of large valley oak trees that are defined as "heritage trees".

Policy E-3
New development shall be sited to maximize the protection of native tree species and sensate plants and wildlife habitats.

Policy E-5
The City shall require site-specific surveys to identify significant vegetation and wildlife habitat for development projects located in or near sensitive habitat areas.

Policy E-6
The City shall support federal and state laws and policies preserving rare, threatened, and endangered species by ensuring that development does not adversely affect such species or by fully mitigating adverse effects consistent with the recommendations of the U.S. Fish and Wildlife Service and California Department of Fish and Game.

Implementation Program 8
The City shall adopt a heritage tree ordinance that defines and identifies mature trees to be protected and establishes regulations for their protection and removal.

Mitigation Measure (Biological Resources)
The City should work with DFG in identifying an area or areas suitable for Swainson's hawk and burrowing owl habitat; this land should be preserved and put into a mitigation land bank to mitigate impacts on existing habitat for these species.

Mitigation Measure (Biological Resources)
The City shall manage portions of storm drainage detention ponds and drainage ponds, and other appropriate areas, as wildlife habitat.

The added potential environmental impacts associated with the density increases, open space preservation policies, and growth levels called for in the Housing Element will be effectively mitigated by the existing Conservation Element policies and *General Plan EIR* mitigation measures. Increases to density of urban uses will not increase the level of impact to biological resources, and potential fragmentation of open space areas will be mitigated by existing policies requiring consultation with California Department of Fish and Game, U.S. Fish and Wildlife, and special-status species surveys prior to development of lands within the city limits or proposed annexation areas.

In addition to these existing policies, the encouragement of infill development can have a potentially positive impact on biological resources by facilitating a reduction in land consumption. Given existing policies and mitigation measures in place, as well as the infill encouragement provisions of the Housing Element, this impact is considered **less than significant**.

Another aspect of impacts to sensitive biological communities is the consistency of the Project with the Habitat Conservation Plan (HCP). The HCP considers development of the lands within the city limits and sphere of influence, assessing the impacts associated with such development. The HCP assumes that development of these lands will eliminate any potential habitat value of the lands within the study area. The Project does not increase the boundaries of the SOI or the city limits, and thus has no impact on lands identified as potentially valuable habitat for special species in the area. While Program 9 of the Housing Element does call for annexation of up to 600 acres on the west side of the community to meet projected residential development needs, this land is within the existing Sphere of Influence for the city, and the impacts of development of this area were adequately considered in the *General Plan EIR* and accounted for in the HCP. The Project is consistent with the adopted Habitat Conservation Plan for San Joaquin County. The impact to the adopted Habitat Conservation Plan is **less than significant**.

Impact BIO-2 Impact on Jurisdictional Wetlands

Expanding residential development into outlying areas increases the potential for impact to jurisdictional wetlands. While the Housing Element does not increase the planned urban boundaries of the city or proposes changes to the city limits and sphere of influence, the policies contained in the Element have the potential to alter the density and timing of development in outlying areas. The increases in density on residential sites could increase impacts of urban runoff and water quality degradation associated with increased construction or infrastructure necessary to support the planned housing.

Major wetland areas in the city of Lodi are the Mokelumne River and Lodi Lake, as well as adjacent ponds formed during high water periods. The *Lodi General Plan EIR* considered impacts to water quality in these areas, as it is associated with urban development. Multiple policies and mitigation

measures were put in place to alleviate projected impacts. Following are the relevant policies and mitigation measures from the *General Plan EIR*.

> **Policy A-8**
> The City shall support efforts on a county, regional, state, and federal level to reduce runoff of toxic chemicals from agricultural lands.
>
> **Policy E-7**
> The City shall prohibit the development of facilities and trails in Lodi Lake Park that will degrade or destroy riparian habitat values.
>
> **Mitigation Measure (Biological Resources)**
> The City shall manage portions of storm drainage detention ponds and drainage ponds, and other appropriate areas, as wildlife habitat.

In addition to local policies and mitigation measures, there are a variety of federal laws prohibiting the degradation or impact to federal wetlands or waters of the United States. As noted in the regulatory background portion of this section, both the U.S. Army Corps of Engineers and the California Department of Fish and Game have regulatory authority over any projects that have the potential to modify, divert, or affect wetlands. Because the potential impacts to wetlands associated with future development will depend heavily on project-specific design characteristics including density, amount and location of pavement, drainage, and other factors, it is not possible to accurately gage impacts at this level of review. Future residential projects within the city that have the potential to impact wetlands will be required to undergo subsequent environmental review and mitigate all impacts associated with jurisdictional wetlands. With all impacts required to be addressed at the later point of review, the impact is considered **less than significant**.

Notes and References

[1] City of Lodi. *General Plan Background Report* (1990), Page 12-2.
[2] Personal communications with Gerald Park (San Joaquin COG) and Amy Augustine (Augustine Land Use Planning). October 7, 2003.

3.3 Cultural and Historic Resources

This section provides an evaluation of the potential effects the Housing Element Update may have on cultural and historic resources.

Environmental Setting

Prehistoric Resources

Historically, the Plains Miwok Indians inhabited the northern portion of the San Joaquin Valley, within the area that includes modern-day Lodi. The Miwok Indians are generally characterized as hunters and gatherers that lived a semi-sedentary lifestyle. Several studies within the project region have provided evidence that the Miwok Indians utilized the Mokelumne River, located along the northern boundary of Lodi. In general, the majority of Native American sites found in the Lodi area are located along the southern banks of the Mokelumne River, near the town of Woodbridge.

Historical Resources

Lodi is best known for its thousands of acres of agricultural land mainly devoted to Tokay Flame grape vineyards, which were first planted in the area in 1864, and increasingly planted over time. Lodi is an agriculturally-oriented community that was established in 1869 when the Town of Mokelumne Station was founded by the Central Pacific Railroad. It later incorporated as the City of Lodi in 1907.

The presence of these unique vineyards in the Lodi area served to shape the character of the city. In 1907, the Lodi Arch, considered a State Historical Landmark and listed on the National Register of Historic Places, was constructed to commemorate the first of what would eventually be an 80-year tradition, the annual Lodi Grape Festival. The Lodi Arch is constructed in the Mission Revival style and is considered the foremost historic resource in the city. The arch was rehabilitated in 1984 and remains in its original condition. The arch is located at the western intersection of Pine Street and the Union Pacific Railroad tracks in Downtown Lodi and serves as the "gateway" into the downtown area.

In addition to the Lodi Arch, two other structures are currently listed on the National Register of Historic Places. The Hotel Lodi, located on School Street, was originally operated from 1915 to 1922. The hotel is characterized as a three story L-shape, made of reinforced masonry, and constructed in the Renaissance Revival manner. The building was renovated in 1990. The Women's Club of Lodi, located on Pine Street, was constructed in 1923. The building is a classic example of early 20th century neo-classical architecture. It is also considered a significant historic resource given its intended use was originally for non-commercial purposes, rare for its time.

Lodi is also home to several other historically significant buildings. The downtown area was established during the early days of the city, between 1869 and 1920. Currently, the area includes approximately 70 historic buildings. Within a 22-block radius of the downtown area, 45 of the buildings are considered to make a significant collection of historic resources. A 1987 preliminary study of the Downtown Lodi area concluded that the entire collection of downtown buildings is eligible for local listing and could also be considered a National Register district. More specifically, buildings found in a two-block area within the downtown are considered architecturally significant, regardless of weathering that has occurred over time.

Historical resources play an important role in the lives of the residents of Lodi, as indicated by the existing residential neighborhoods to the east and west of the downtown area. These areas consist of an abundance of historical homes that have been preserved on an owner-driven basis through rigorous maintenance and renovation. Some homes of note outside the downtown area include the Towne Farmhouse (approximately 1920), the Beckman Ranch House (1900), and the Hill House (1902). However, the City of Lodi does not administer any specific programs related to preservation of historical homes.

Methodology

The entire Housing Element Update is incorporated by reference to this EIR. Implementation of the majority of the programs included within the Housing Element Update will not result in potential environmental effects. For the purposes of this section of the EIR, only those policies, goals, and/or programs that may result in environmental effects related to cultural and historic resources have been analyzed. The following excerpt includes all relevant Housing Element policies and programs:

> **Program 4: Land Inventory**
>
> The City shall prepare and maintain a current inventory of vacant, residentially zoned parcels and a list of approved residential projects, and shall make this information available to the public and developers, including information on underutilized sites within the downtown area with residential or mixed-use development potential. The City shall update the inventory and list at least annually. The City will promote the land inventory and the availability of each update through the City's web site, a notice at the Community Development Permit Counter, and a press release subsequent to each update.
>
> To encourage the maximum efficient use of land within the current City limits, Lodi will also conduct a study of residential development potential on underutilized industrial and commercial sites along Cherokee Lane, South Sacramento Street, South Stockton Street, and West Kettleman Lane. Properties along these streets may be suitable for future residential development if sufficient land can be consolidated to make such development feasible. These areas are characterized by obsolete patterns of land development, older structures in substandard condition, odd-sized lots, and marginally viable commercial and industrial uses that would make properties ripe for redevelopment in the next five to ten years. If Lodi determines that residential development is feasible along these streets, the City will initiate a planning process with property owners (which may be a special area plan or a specific plan meeting state law requirements) to define specific properties suitable for residential or mixed-use development, appropriate development standards, and improvements needed to support residential development.

Responsibility:	Community Development Department, Planning Commission, City Council
Timeframe:	Complete study of residential development potential by December 2006; prepare and adopt area plan(s) by December 2008.
Funding:	General Fund, contributions from property owners
Objective:	Increase the potential for infill development, thereby reducing the need to prematurely annex land and convert agricultural land to urban use

Thresholds of Significance

Impact on cultural and historic resources is considered potentially significant if the Housing Element Update will:

- Cause a substantial adverse change in the significance of a historic resource and/or archaeological resource, as defined in Section 15064.5.
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
- Disturb any human remains, including those interred outside of formal cemeteries.

Environmental Impact and Mitigation Measures

Impact C/HR-1 Impact on Known and Undiscovered Cultural Resources

The cultural resource sites that have been previously identified within the Project area considered by the Housing Element Update are located along the southern banks of the Mokelumne River. There are also identified historical resources within the developed portion of Lodi. Program 4, included above, identifies vacant land and land for potential reuse within the Planning Area that could be used to accommodate the City's anticipated housing needs. As seen in Figures 2-3, 2-4, and 2-5, there are no sites located along the southern bank of the Mokelumne River identified for residential use. However, given the presence of Native Americans throughout this region of the valley, there is a potential for development of previously undisturbed sites to uncover cultural sites and features that have not been previously discovered. Undiscovered cultural resources could be potentially damaged as a result of site development activities. If left unmitigated, impacts to previously undiscovered cultural resources would be significant.

The City does not specifically implement any policies or programs to promote preservation of historical structures within Lodi. The majority of historic properties within the city are concentrated in the downtown area, which is within the City's established Redevelopment Area. As such, the Housing Element Update identifies some areas that could be reused for residential purposes. Development of infill sites for residential uses could result in impacts to potentially historic

structures. *If left unmitigated, implementation of* the Housing Element Update would result in **potentially significant impacts** to historic structures.

Mitigation Measure C/HR-1

Should grading or excavation activities reveal the presence of archaeological and/or paleontological resources, work activities in the vicinity of the find shall be temporarily halted and a qualified archaeologist consulted to assess the significance of the resource. Proper management recommendations for significant resources could include avoidance or data recovery excavation. Should human skeletal remains be encountered, State law requires immediate notification of the County Coroner. Should the County Coroner determine that such remains are in an archaeological context, the Native American Heritage Commission in Sacramento shall be notified immediately, pursuant to State law, to arrange for Native American participation in determining the disposition of the remains.

Mitigation Measure C/HR-2

Existing structures, ages 45 years old and older, on redevelopment sites identified within the Housing Element Update shall be evaluated by a qualified professional architectural historian prior to demolition/removal to determine the suitability of the structure for historic status. If disturbance to an historic resource cannot be avoided, appropriate mitigation shall be identified. Appropriate mitigation may include preservation in place or relocation and rehabilitation. A mitigation program shall be implemented to ensure implementation of the measure.

Following implementation of the mitigation measures identified above, potential impacts related to cultural and historic resources resulting from implementation of policies and programs within the Housing Element Update are considered **less than significant.**

3.4 Geology, Soils, and Mineral Resources

This section describes potential impacts of the Housing Element Update due to geologic conditions, seismic activity, soil conditions, and mineral resources.

Environmental Setting

Geology

The Great Valley is a 400-mile long northwest-trending trough, which has been, and continues to be, filled with alluvial sediment from tectonic uplift and erosion of the mountains to the east.

Groundwater

The Central Valley is underlain by major groundwater basins and several smaller basins along the foothills and mountain valley areas. The City of Lodi utilizes a groundwater basin for its domestic water supply however; the basin is not considered a major aquifer within the Central Valley system. The groundwater basin underlying Lodi was created over time by a vast thickness of alluvium that has become saturated to a relatively shallow depth. Water can be encountered at approximately 50 feet below ground surface. As seen in Figure 3.2-1, the Mokelumne River is located along the northern boundary of the city. The river is the main source of local groundwater recharge in the project area. There has been a problem with overdrafting of the groundwater basin for over approximately four decades. The water level varies seasonally and is dependant upon rainfall. The presence of shallow groundwater is known to play a role in the occurrence of liquefaction and has been recorded as a contributing factor of subsidence in the southern San Joaquin County area of California. See Sections 3-5, Hydrology and 3-9, Public Facilities of this EIR for further discussion of groundwater availability and water quality.

Seismic Safety

In general, the state of California in its entirety is potentially subject to groundshaking associated with seismic activity, given the extensive network of faults that are present throughout the state. The major fault zone nearest to Lodi is the San Joaquin fault, located to the south along the hills just southwest of Tracy. The San Joaquin fault extends south, along the foothills, for approximately 35 miles. There are no Alquist-Priolo fault zones identified within the city boundary or within San Joaquin County. The nearest identified Alquist Priolo fault zone is located within Contra Costa and Alameda counties, approximately 50 miles southwest of the city.

Given Lodi's location in relation to known faults, the potential for groundshaking experienced within the city has been estimated to be between a 6.0 magnitude and an 8.0 magnitude earthquake

event, originating from the major faults of the San Andreas Fault system, the Midland Fault, or the Tracy-Stockton Fault. The way in which the human environment is impacted by groundshaking effects is related to the presence and level of groundwater, as well as the type and texture of the substrate in which they occur. Areas adjacent to and near the Mokelumne River will experience groundshaking events differently from the southeastern area of Lodi because of the differing levels of groundwater. Lodi is located within the potential liquefaction zone of the Midland Fault (see discussion below).

However, given the absence of known faults within the Lodi area, the risk of surface rupture is considered minimal. Damage resulting from a large earthquake event would mainly be associated with structural damage to poorly built, masonry structures and may cause some level of widespread fear. In the event of the anticipated maximum 8.0 magnitude event, structural damage could occur to even well-made structures.

Liquefaction

Liquefaction occurs when sediment, saturated with water, temporarily loses strength, causing ground failure. This can be caused by earthshaking. Soils most susceptible to liquefaction are loose, clean and uniformly graded fine grained sands. Silty sands can also liquefy during strong groundshaking. Lodi is located in the potential liquefaction zone for the Midland Fault because the city is underlain by saturated, clay-free sand and silt, which can liquefy with the passage of seismic energy.

Soil Stability

The topography of Lodi is generally flat, ranging in elevation from 10 feet above mean sea level on the west side of the city to 20 feet above mean sea level on the east side of the city. Because of its location in the Central Valley and the surrounding flat topography, Lodi is not exposed to any landslide risks.

The majority of soils within the Project area consist of variants of the Tokay soil series, as mapped by the U.S. Soil Conservation Service. The three variants of the Tokay series present are all fine sandy loam. There are also small mapped units of Tujunga loamy sands throughout the project area, and Clear Lake clay and Columbia fine sandy loams located near the Mokelumne River.

Constituents of the Tokay soils series are generally well-drained, permeable soils that have low shrink-swell potential and provide a competent base for all types of development. However, Tokay soils are also considered prime agricultural soils because of their exceptional ability to support crop production. Although only occasional occurrences of Tujunga soils are found in Lodi, it is important to note that when these soils are denuded of vegetative cover, they present a significant wind erosion hazard. Tujunga soils are typically well drained and have low shrink/swell potential.

Mineral Resources

There are no significant identified mineral resources within Lodi. The alluvium that underlies the area is generally suitable for use as construction aggregate.

Regulatory Background

Regional Water Quality Control Board

A National Pollution Discharge Elimination (NPDES) General Permit for Storm Water Discharges Associated with Construction Activities, issued by the Central Valley Regional Water Quality Control Board (RWQCB), is required when site development involves clearing, grading, disturbances to ground, such as stockpiling, or excavation that results in soil disturbances of at least five acres of total land area. Erosion potential from exposed soils is controlled through compliance with Permit requirements, including the implementation of a stormwater pollution prevention plan (SWPPP) that includes utilization of Best Management Practices (BMPs). The BMPs may include such measures as:

- Avoidance of excavation and grading activities during wet weather;
- Construction diversion dikes to channel runoff around the site, and lining channels with grass or roughened pavement to reduce velocity of runoff;
- Covering stockpiles and excavated soil with tarps or plastic sheeting;
- Removal of existing vegetation only when absolutely necessary;
- Planting temporary vegetation for erosion control on slopes or where construction is not immediately planned, and planting permanent vegetation as soon as possible; and,
- Other measures, as deemed necessary by the RWQCB.

Methodology

The entire Housing Element Update is incorporated by reference to this EIR. Implementation of the majority of the programs included within the Housing Element Update will not result in potential environmental effects. For the purposes of this section of the EIR, only those policies, goals, and/or programs that may result in environmental effects related to geology, soils, and mineral resources have been analyzed. The following excerpt includes all relevant Housing Element policies and programs:

Goal A: **To provide a range of housing types and densities for all economic segments of the community while emphasizing high quality development, homeownership opportunities, and the efficient use of land.**

Policies

1. The City shall promote the development of a broad mix of housing types through the following mix of residential land uses: 65 percent low density, 10 percent medium density, and 25 percent high density.

13. The City shall encourage infill residential development and higher residential densities within the existing City limits near transit stops, and compact development patterns in annexation areas to reduce public facility and service costs, avoid the premature conversion of natural resource and agricultural lands, and reduce the number of trips from private vehicles.

Program 2: *Revise Growth Management Program*

The City will revise its growth management program to exempt housing units affordable to very low- or low-income households with long-term affordability restrictions.

Responsibility:	*Community Development Department*
Timeframe:	Begin second round of allocations, if needed, in 2005 and annually thereafter
Funding:	Application fees
Objective:	Expedite the residential development approval process

Program 4: Land Inventory

The City shall prepare and maintain a current inventory of vacant, residentially zoned parcels and a list of approved residential projects, and shall make this information available to the public and developers, including information on underutilized sites within the downtown area with residential or mixed-use development potential. The City shall update the inventory and list at least annually. The City will promote the land inventory and the availability of each update through the City's web site, a notice at the Community Development Permit Counter, and a press release subsequent to each update.

To encourage the maximum efficient use of land within the current City limits, Lodi will also conduct a study of residential development potential on underutilized industrial and commercial sites along Cherokee Lane, South Sacramento Street, South Stockton Street, and West Kettleman Lane. Properties along these streets may be suitable for future residential development if sufficient land can be consolidated to make such development feasible. These areas are characterized by obsolete patterns of land development, older structures in substandard condition, odd-sized lots, and marginally viable commercial and industrial uses that would make properties ripe for redevelopment in the next five to ten years. If Lodi determines that residential development is feasible along these streets, the City will initiate a planning process with property owners (which may be a special area plan or a specific plan meeting state law requirements) to define specific properties suitable for residential or mixed-use development, appropriate development standards, and improvements needed to support residential development.

Responsibility:	Community Development Department, Planning Commission, City Council
Timeframe:	Complete study of residential development potential by December 2006; prepare and adopt area plan(s) by December 2008.
Funding:	General Fund, contributions from property owners
Objective:	Increase the potential for infill development, thereby reducing the need to prematurely annex land and convert agricultural land to urban use

Program 9: Annexation of Land to Accommodate Future Housing Needs

The City will work with property owners of approximately 600 acres outside the current City

limits, but within Lodi's Sphere of Influence (SOI), to plan for, and annex the land to the City so that additional residential development opportunities can be provided to meet Lodi's future housing construction needs. The 600 acres is located between Harney Lane, Lower Sacramento Road, the Woodbridge Irrigation District canal, and the western SOI boundary. The City has facilitated a specific planning process with property owners of approximately 300 acres to prepare these sites for annexation to the City. The development potential for the properties to be annexed is summarized in Table II-1B.

The City does not need to annex all 600 acres within the next three to five years to meet housing construction need given the backlog of unused housing allocations and available sites within the current City limits, but will initiate the process with property owners during the 2003 - 2008 period.

Responsibility:	Community Development Department, Planning Commission, City Council
Timeframe:	Annex initial 300 acres by December 2005; annex remaining land by December 2008.
Funding:	Annexation and permit fees
Objective:	Increase the City's residential development capacity to accommodate its share of the region's future housing construction needs between 2001 and 2008, and subsequent years, under the San Joaquin County Council of Governments housing allocation plan

Goal B: **To encourage the maintenance, improvement, and rehabilitation of existing housing and residential neighborhoods, particularly in the Eastside area, and the preservation of existing affordable housing.**

Program 13: Housing Rehabilitation and Code Enforcement

The City will continue to combine code enforcement and housing rehabilitation assistance, targeted to the Eastside area. The City will promote its program through the Eastside Improvement Committee, a neighborhood organization that provides direct outreach to area residents and property owners, by providing information at the Community Development Department's public counter, and through a link to the program on the City's website. The City's Community Improvement Manager will work with the Committee to continue marketing the program to Eastside area residents and property owners.

Responsibility:	Community Development Department
Timeframe:	Current and ongoing, 2003 - 2008
Funding:	CDBG and HOME, CalHOME
Objective:	Improvement of 1,000 housing units (including private investment to correct code violations) over five years

Program 18: Preservation of the Eastside Area

The City will continue to target a portion of its annual CDBG allocation for public improvements in the Eastside area in support of its housing rehabilitation and neighborhood improvement activities. The City will also maintain the Eastside single-family residential zoning as a regulatory tool to preserve the character of the neighborhood and encourage private investment in older homes.

Responsibility:	Community Development Department, Planning Commission, City Council
Timeframe:	Annual CDBG allocation, maintain zoning, 2003 - 2008
Funding:	CDBG, permit fees, impact fees
Objective:	To preserve and improve the Eastside area.

Thresholds of Significance

According to the CEQA Guidelines, impact would be significant if a project associated with the Housing Element Update:

- Exposes people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, or landslides
- Results in substantial soil erosion or loss of top soil
- Is 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 an on-site or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.
- Is located on expansive soil
- Has soil incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems.
- 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.
- 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.

Environmental Impact and Mitigation Measures

Impact GEO-1 Potential for Seismic Effects

Standard City of Lodi practices for issuance of building permits will be relied upon to reduce impacts related to geotechnical/seismic issues because there are no major geologic features/issues within the Planning area. As indicated above, the city is located within the potential liquefaction zone for the Midland Fault. The soil in and around the Lodi area is predominately a sandy loam type that is characterized by well-drained soil with a hardpan layer approximately five feet under the surface, which can be susceptible to the occurrence of liquefaction. Strict adherence to the construction standards mandated for Seismic Area 3 by the Uniform Building Code are expected to mitigate any structural concerns associated with the construction of dwelling units recommended within the Housing Element Update. Impacts related to potential seismic effects are considered **less than significant**.

Impact GEO-2 Increased Erosion Potential

Expanding residential development into outlying areas increases the potential for impacts related to erosion as a result of ground disturbance during the site development process.

The most common form of erosion within the Lodi area, given the relatively flat topography is wind erosion. The San Joaquin Valley Air Pollution Control District currently exceeds both EPA and California Air Resources Board standards for dust of 10 microns or less, commonly known as PM_{10}. As a result, the District has promulgated rules regarding dust under the 2003 PM_{10} Attainment Plan. The policies and programs identified in the Housing Element Update could result in an incremental increase of the formation of PM_{10} through construction activities related to recommended housing development. The routine implementation of provisions in the District's 2003 PM_{10} Attainment Plan is expected to reduce erosion effects to a point below significance.

There is potential for erosion caused by surface runoff to increase during construction activities as well as during operation of projects due to an increase in impervious surfaces. Surface water runoff picks up sediment as it flows over disturbed soils and urban surfaces resulting in erosion. Consequently, residential development that occurs from implementation of the Housing Element Update may result in increased soil erosion. Projects will be required to comply with the provisions established by the National Pollutant Discharge Elimination System (NPDES) permit system, which regulates municipal and industrial discharges to surface water of the United States, administered by the Regional Water Quality Control Board (RWQCB). Compliance with the NPDES permit requires that any construction activity affecting one acre or more obtain a General Construction Activity Stormwater Permit and prepare a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP identifies Best Management Practices (BMPs), source control and erosion control measures, that will be installed during construction activities to reduce construction effects on receiving water quality. BMPs that will serve to reduce the occurrence of soil erosion include, but are not limited to, preservation of existing vegetation, temporary mulching, seeding, or other stabilization measure to protect disturbed soils, silt fencing, as well as velocity reduction mechanisms.

Impacts related to potential erosion resulting from implementation of the policies and programs of the Housing Element Update are considered **less than significant**.

Impact GEO-3 Interference with Potential Mineral Extraction

As identified in Program 9 of the Housing Element Update, the City anticipates relying upon annexation to accommodate the majority of its expected residential development. The area identified for potential annexation is located adjacent to the southeastern corner of the developed city, outside the city limits and within the Sphere of Influence. The area encompasses approximately 600 acres and a specific planning process has been initiated. There are currently no mineral extraction activities occurring within this area.

Any potential mineral extraction sites will be rendered unsuitable for extraction by expanding residential development into outlying areas. However, there are presently no extraction operations in or around the immediate Lodi area; therefore, this impact is expected to be **less than significant**.

3.5 Health and Safety

Potential threats to public safety, including those related to hazardous materials and wildland fires are assessed and evaluated in this section. Hazards associated with geology, flooding, and noise are discussed in other sections of this EIR.

Environmental Setting

Two railroad lines run through Lodi on the east and west sides of State Route 99. A third set of inactive tracks runs east-west along Railroad Avenue. These rail lines commonly transport hazardous materials. In general, the trains that run on these lines could be transporting liquefied petroleum gasoline, flammable liquids, and other hazardous materials. Several federal and State agencies, as well as railroad companies, administer programs associated with labeling, safe packaging, limitations on quantities of shipments, as well as proper actions following an incident in order to prevent negative impacts to the human environment associated with railroad transportation activities. Lodi's municipal code includes provisions that limit the transport of corrosive and flammable materials by commercial vehicles within the residential areas of the city.

Pursuant to the California Environmental Quality Act (CEQA), the California Department of Toxic Substances Control (DTSC) maintains a Hazardous Waste and Substances Sites List (Cortese List). As part of the Cortese list, DTSC also tracks "Calsites," which are mitigation or brownfield sites that are subject to Annual Workplans and/or are listed as Backlog sites, confirmed release sites that are not currently being worked on by DTSC, in Health and Safety Code Section 25356. Before placing a site in the backlog, DTSC ensures that all necessary actions have been taken to protect the public and environment from any immediate hazard posed by the site.

There are ten sites within Lodi listed with the DTSC that no longer require remediation activities. One site, associated with Hughes Spray Chemical, was referred to the Regional Water Quality Control Board for clean up of soil contamination associated with onsite storage drums and pesticide washdown activities. The Lodi Door and Metal site, located east of State Route 99 in an industrially zoned area, consisted of an evaporation pond that was shown to be contaminated with chromium and nickel, which are known carcinogens; lead, which is toxic, and zinc, which is potentially toxic. The site was remediated and was issued a closure certification by DTSC in 1991. The eight remaining sites listed within Lodi required minimal investigation of potentially hazardous situations and were quickly deemed to need no further action.

There are four identified Calsites within Lodi that are currently considered active remediation sites and are all somewhat related. The Lodi Groundwater Area of Contamination consists of a groundwater plume that is approximately 1.5 miles long and 0.5 miles wide and is located in the central part of the city. Perchloroethene (PCE), trichloroethene (TCE), and 1,1,1-trichloroethene (1,1,1-TCA) were discovered within the groundwater and the City has since taken two of its drinking water wells out of service. The three other listed sites in Lodi have been determined to be

contributing factors to the groundwater plume. They include the Lustre-Cal Nameplate Corporation, the Guild Cleaners, and the Busy Bee Cleaners.

Two sites associated with PG&E manufactured gas plants are listed as active DTSC sites within Lodi. Preliminary Endangerment Assessments have yet to be prepared that would determine the exact level of threat, if any, associated with these sites. The San Joaquin County Environmental Health Department administers an Underground Storage Tank (UST) program that includes permitting procedures for the installation and/or removal of USTs, repair and retrofit, and closure in place of existing USTs. The program also includes the compilation and maintenance of the UST Site Mitigation Database, which identifies all contaminated sites associated with USTs throughout the jurisdiction. As of May 2002, there were 24 USTs within Lodi listed within the database that were associated with some level of contamination to either the groundwater and/or soil around them.

Fire risk in Lodi is generally associated with urban uses such as commercial development, construction sites, and various residential developments. The presence of the historical downtown district presents a unique fire hazard given that the buildings are not protected by modern fire walls or equipped with sprinkler systems. The City of Lodi Fire Department provides fire protection for residents and buildings within the city (See Section 3-9, Public Facilities of this EIR for further discussion).

Because of the quantity of irrigated agricultural land surrounding the city, Lodi is well protected from the risk of wildland fires. However, during the summer months, Lodi is often subject to grass fires. The Lodi Fire Department administers a weed abatement program, which somewhat reduces the hazard of grass land fires.

Regulatory Background

Hazardous materials and waste regulations are implemented by a number of government agencies including, but not limited to, the following:

- United States Environmental Protection Agency (USEPA);
- California Environmental Protection Agency (EPA) - Division of Toxic Substances Control;
- Regional Water Quality Control Board (RWQCB);
- California Division of Industrial Safety;
- California State Fire Marshall;
- California Highway Patrol; and,
- Local police and fire departments.

Each of the aforementioned agencies has established regulations regarding the proper transportation, handling, management, use, storage, and disposal of hazardous materials for specific operations and activities.

Methodology

The entire Housing Element Update is incorporated by reference in this EIR. Implementation of the majority of the programs included within the Housing Element Update will not result in potential environmental effects. For the purposes of this section of the EIR, only those policies, goals, and/or programs that may result in environmental effects related to health and safety issues have been analyzed. The following excerpt includes all relevant Housing Element policies and programs:

Goal A: **To provide a range of housing types and densities for all economic segments of the community while emphasizing high quality development, homeownership opportunities, and the efficient use of land.**

Program 3: Personal Security Standards

The City will continue to implement design standards applicable to all new residential projects with the objective of improving the personal security of residents and discouraging criminal activity. Design standards will address issues such as the placement of landscaping accessory buildings, and accessory structures in a manner that does not impede the City's ability to conduct neighborhood police patrols and observe potential criminal activity, lighting and other security measures for residents, and the use of materials that facilitate the removal of graffiti and/or increase resistance to vandalism.

Responsibility: Community Development Department
Timeframe: Current and ongoing, 2003 – 2008
Funding: *Permit fees*
Objective: Reduce the susceptibility of residential properties and neighborhoods to criminal activity and increase residents' perception of personal safety

Program 4: Land Inventory

The City shall prepare and maintain a current inventory of vacant, residentially zoned parcels and a list of approved residential projects, and shall make this information available to the public and developers, including information on underutilized sites within the downtown area with residential or mixed-use development potential. The City shall update the inventory and list at least annually. The City will promote the land inventory and the availability of each update through the City's web site, a notice at the Community Development Permit Counter, and a press release subsequent to each update.

To encourage the maximum efficient use of land within the current City limits, Lodi will also conduct a study of residential development potential on underutilized industrial and commercial sites along Cherokee Lane, South Sacramento Street, South Stockton Street, and West Kettleman Lane. Properties along these streets may be suitable for future residential development if sufficient land can be consolidated to make such development feasible. These areas are characterized by obsolete patterns of land development, older structures in substandard condition, odd-sized lots, and marginally viable commercial and industrial uses that would make properties ripe for redevelopment in the next five to ten years. If Lodi determines that residential development is feasible along these streets, the City will initiate a planning process with property owners (which may be a special area plan or a specific plan meeting state law requirements) to define specific properties suitable for residential or mixed-use development, appropriate development standards, and improvements needed to support residential development.

Responsibility: Community Development Department, Planning Commission, City Council
Timeframe: Complete study of residential development potential by December 2006; prepare and adopt area plan(s) by December 2008.
Funding: General Fund, contributions from property owners
Objective: Increase the potential for infill development, thereby reducing the need to prematurely annex land and convert agricultural land to urban use

Goal B: ***To encourage the maintenance, improvement, and rehabilitation of existing housing and residential neighborhoods, particularly in the Eastside area, and the preservation of existing affordable housing.***

Program 13: Housing Rehabilitation and Code Enforcement

The City will continue to combine code enforcement and housing rehabilitation assistance, targeted to the Eastside area. The City will promote its program through the Eastside Improvement Committee, a neighborhood organization that provides direct outreach to area residents and property owners, by providing information at the Community Development Department's public counter, and through a link to the program on the City's website. The City's Community Improvement Manager will work with the Committee to continue marketing the program to Eastside area residents and property owners.

Responsibility: Community Development Department
Timeframe: Current and ongoing, 2003 - 2008
Funding: CDBG and HOME, CalHOME
Objective: Improvement of 1,000 housing units (including private investment to correct code violations) over five years

Program 14: Property Maintenance and Management Standards

The City will continue to implement standards for private property maintenance (Chapter 15.30 of the Municipal Code) to 1) control or eliminate conditions that are detrimental to health, safety, and welfare; 2) preserve the quality of life and alleviate certain socioeconomic problems created by physical deterioration of property; and 3).protect property values and further certain aesthetic considerations for the general welfare of all residents of the City of Lodi.

Responsibility: Community Development Department
Timeframe: Code enforcement on both complaint and pro-active basis, 2003 - 2008
Funding: Inspection fees, code violation penalties, CDBG funds (for dwelling units occupied by low-income households)
Objective: Eliminate substandard building and property conditions

Program 17: Mobilehome Park Preservation

Lodi will meet with mobilehome park owners to discuss their long-term goals for their properties and the feasibility of preserving these parks. Feasibility will be evaluated based on the condition of park infrastructure and buildings, the condition of mobile homes located in the park, parcel size, accessibility to services, and surrounding land uses. Several of the parks are small (fewer than 50 spaces) and may not be prime candidates for preservation. For those parks that are feasible to preserve, the City will:

- Assist property owners in accessing state and federal funds for park improvements by preparing funding requests, providing information to park owners on state and federal programs, and/or providing referrals to nonprofit organizations who can assist in preparing funding requests.

- Facilitate a sale to park residents of those mobile home parks the City has targeted for preservation and whose owners do not desire to maintain the present use. If necessary to facilitate a sale, the City will seek state and federal funding to assist residents in purchasing, improving, and managing their parks and/or seek the assistance of a nonprofit organization with experience in mobile home park sales and conversion to resident ownership and management.

The City shall also require, as condition of approval of change of use, that mobilehome park owners who desire to close and/or convert their parks another use provide relocation or other assistance to mitigate the displacement of park residents, as required by California Government Code Section 65863.7. The City shall also require the park owner to provide evidence of resident notification of intent to close and/or convert the mobilehome park as required by state law.

Responsibility:	Community Development Department
Timeframe:	Meet with property owner and other interested parties by December 2004
Funding:	CDBG, HOME California Housing Finance Agency HELP program, California Mobilehome Park Resident Ownership Program
Objective:	To preserve approximately 400 mobilehomes and spaces in mobilehome parks with the highest feasibility for continued operation

Program 18: Preservation of the Eastside Area

The City will continue to target a portion of its annual CDBG allocation for public improvements in the Eastside area in support of its housing rehabilitation and neighborhood improvement activities. The City will also maintain the Eastside single-family residential zoning as a regulatory tool to preserve the character of the neighborhood and encourage private investment in older homes.

Responsibility:	Community Development Department, Planning Commission, City Council
Timeframe:	Annual CDBG allocation, maintain zoning, 2003 - 2008
Funding:	CDBG, permit fees, impact fees
Objective:	To preserve and improve the Eastside area.

Thresholds of Significance

According to the CEQA Guidelines, hazards and hazardous materials impacts would be significant if the Housing Element Update:

- Creates a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

- Creates 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.

Environmental Impact and Mitigation Measures

Impact HS-1 Effects on Public Safety

The Housing Element Update identifies areas within the developed portion of the city that have reuse potential to accommodate residential land uses. Some of these sites are located near the railroad tracks that traverse Lodi. The tracks are straight and flat, with a minor curve north of the Mokelumne River. Activities associated with active operation of the railroad tracks are regulated by the United States Department of Transportation, Federal Railroad Administration, and a variety of other agencies.

The Federal Railroad Administration administers a safety program that oversees the movement of hazardous materials, including dangerous goods, such as petroleum, chemical, and nuclear products throughout the Nation's rail transportation system. The current hazardous materials safety regulatory program includes a hazardous materials incident reduction program, a tank car facility conformity assessment program, tank car owner maintenance program evaluations, spent nuclear fuel and high-level nuclear waste program, and several others. Union Pacific Railroad also implements its own safety program, which includes programs related to public awareness, vegetation control, crossing accident reduction enforcement, "near hit" program, and crossing closure activities.

Neither the railroad companies nor the federal government provide a record of each type of cargo transported along a particular line. However, railroad companies are required to log all hazardous materials that are transported. In general, railroad lines can be used for any type of freight moved by train, including fuels, finished and unfinished commercial goods, industrial and construction equipment, wastes, lumber, and raw materials. The type and amount of particular cargo is not known in advance and schedules for rail traffic on particular lines can be changed multiple times daily. Typically, containers that are used to transport hazardous materials are double-walled iron or steel cars, designed to hold cargo without spill even in the event of a derailment.

Pedestrian and vehicular crossings include safeguards such as dual reflectorized gates, with mast mounted flashing lights and bells, stop lines and railroad crossing symbols painted on the pavement on both sides of each crossing. Safety barriers can be used to provide a physical obstruction between a railroad track and sites developed with urban land uses. The form of such barriers can include stone or masonry walls, wooden or chain link fences, or some combination thereof. Projects developed near the railroad as result of recommendations within the Housing Element Update may be required to include safety and sound barriers in the event that there is a need to mitigate significant physical or acoustic impact. See Section 3-8, Noise, of this EIR for further discussion of noise related to the railroad.

There is no published information regarding the distance from the tracks that a train or materials from a train could reach in the event of an accident or derailment, which typically depends on

various factors including physical properties of the materials, speed of the train, severity of impact, topography of surrounding land, and intervening structures and vegetation. The potential for harmful effects due to the release of gaseous hazards would vary significantly depending on the type, density, and amount of gas involved, the prevailing winds, and conditions at release.

The transportation of explosives in trucks is regulated by the U.S. Department of Transportation National Safety Standards, as incorporated into the California Vehicle and Health and Safety Codes. Explosives and corrosives may only be transported on routes established by the local jurisdiction and the California Department of Transportation (CalTrans) and violations are issued by the California Highway Patrol (CHP). In addition, the California Administrative Code sets forth procedures established by the CHP for safe stopping and parking of vehicles loaded with these types of materials.

Program 3 of the Housing Element Update recommends the continued inclusion of personal security standards such as lighting, roadway design standards, placement of landscaping, to deter theft and criminal activity within the residential developments constructed pursuant to the Housing Element. These impacts will be beneficial to the health and safety of current and future residents of Lodi. Additionally, the housing rehabilitation, code enforcement, maintenance, and mobile home park preservation programs included in the Update may also result in beneficial impacts through alleviation of various hazardous conditions that currently exist. For example, preservation of a mobile home park would involve bringing outdated and possibly unsafe electrical, sewer, and natural gas connections up to current code standards. Rehabilitation, code enforcement, and maintenance standards will ensure that housing within the city is not substandard and unsafe to its residents.

Considering the level of existing regulation mandated by the State, City, and federal government, as well as internal control within most lending institutions related to health and safety issues, impacts resulting from implementation of the policies and programs included in the Housing Element Update are considered **less than significant.**

Impact HS-2 Safety Issues Associated with Potentially Hazardous Sites

The reuse of sites within the developed city as recommended by the Housing Element Update may potentially expose construction workers and future residents to hazardous conditions. For example, potential development of former industrial sites may have hazards associated with prior accidental release of contaminants that may not meet standards for residential uses.

A portion of the area identified in Program 4 of the Housing Element Update for reuse is located within the City's designated redevelopment area, which is also located atop the Lodi Groundwater Area of Contamination. As such, the Redevelopment Plan EIR prepared in March 2002 indicates that activities within the area are subject to comply with all applicable existing federal, State, and City-mandated site assessment, remediation, removal and disposal requirements for soil, surface water, and/or groundwater contamination. There is evidence of both soil and groundwater contamination. Impacts related to the exposure of construction workers and future residents to hazardous materials are **potentially significant**.

Mitigation Measure HS-1

Applications for development identified by the Housing Element Update as "Areas within Reuse/Infill Potential" and within the City's designated redevelopment area shall complete a health and safety plan to prevent worker and public exposure to hazardous substances. This plan must comply with the requirements of the City Department of Public Works, San Joaquin County Department of Environmental Health, Regional Water Quality Control Board, and California Department of Toxic Substances Control.

Health and safety plans in the case of soil contamination typically include:

- **Investigation of the site determines whether there has been a hazardous material discharge into soils. If so, characterize the nature and extent of soil contamination that is present prior to the start of construction.**
- **Determination of need for further investigation and/or remediation of soils based on proposed reuse and level of future human contact. For example, commercial uses could require only industrial clean-up levels.**
- **If potential for extensive human contact with contaminated soils following development, undertake a Phase II investigation involving soil sampling at a minimum, at the expense of the property owner or responsible party. Should further investigation reveal high levels of hazardous materials in the onsite soils, mitigate health and safety risks according to City of Lodi, San Joaquin County Department of Environmental Health, and Regional Water Quality Control Board regulations. Also, if buildings are located atop soils that are significantly contaminated, undertake measures to either remove the chemicals or prevent contaminants from entering and collecting within the building.**
- **If remediation is infeasible, a deed restriction shall be required to limit site use and eliminate unacceptable risks to health or the environment.**

Health and safety plans in the case of surface or groundwater contamination typically include:

- **Investigation of the site determines whether there has been a hazardous material discharge into surface water or groundwater. If so, characterize the nature and extent of soil contamination that is present prior to the start of construction.**
- **Installation of drainage improvements to prevent transport and spreading of hazardous materials that may spill or accumulate.**
- **If site investigation determines presence of hazardous materials within site surface water and/or groundwater, mitigation acceptable to the RWQCB shall be incorporated prior to the start of construction.**
- **Inform construction personnel of the proximity to recognized contaminated sites and advise them of health and safety procedures to prevent exposure to hazardous materials in surface water and/or groundwater.**

Adherence to the mitigation measure identified above will result in **less-than-significant** impacts related to the safety issues associated with exposure to potentially hazardous sites resulting from

implementation of the policies and programs and subsequently, recommended development of housing, of the Housing Element Update.

3.6 Hydrology and Water Quality

This section describes impacts associated with the implementation of the Housing Element Update on surface hydrology and water quality within the Project area.

Environmental Setting

Local Hydrology

Lodi and its surrounding areas are located in a former floodplain of the Mokelumne River. The area is generally level, with slight slopes and an elevation ranging from 10 to 20 feet above sea level. Lodi, as well as the California Central Valley, is underlain by alluvial soils deposited by surrounding mountain ranges. Soils were transported to this area through rivers and streams and deposited in floodplain areas. The alluvium is saturated below a relatively shallow depth, making the sedimentary layers underneath the area part of the major aquifer system that extends throughout the Central Valley.

The Mokelumne River serves as the northern boundary of Lodi and is the only above-ground waterway in the community. This river serves to recharge groundwater aquifers as well as provide surface water for irrigation of agricultural lands. Further west, this river provides drinking water and irrigation water to agricultural lands and communities in the eastern San Francisco Bay.

Water Resources

The City of Lodi draws fresh water from both surface and ground sources. Surface water is provided from the Mokelumne River, located to the north of the city. Water from the Mokelumne provides irrigation for agricultural lands in and around the city, as well as for recreational uses and freshwater habitat. This surface water is not currently used for human consumption in Lodi, but the City recently purchased water rights for approximately 6,000 acre-feet of water from the Mokelumne for municipal use. The City's water supply comes from groundwater via 25 municipal wells. Saturated alluvial soils underlay much of the city, extending throughout the Central and San Joaquin Valleys.

The Water Master Plan indicates that the water supply is sufficient to meet future demand, maintaining a service standard of approximately one well per 2,000 people. The system is continually undergoing upgrades; although the placement of future wells may be limited by contamination in some areas east of the Lodi (proposed expansion to meet future housing needs is to the west and will not be affected by contamination). Anticipated water demand in 2009, approximately 49 million gallons per day, will be met by Lodi's existing system of municipal wells and transmission pipelines.

Water Quality

Water drawn from the Mokelumne River is unsuitable for human consumption due to high concentrations of bacterial contamination. Water quality tests have indicated levels of fecal coliform beyond the maximum concentration levels allowed by the State for drinking water. Concentrations of minerals and inorganic chemicals are below the State thresholds, thus making the water suitable for use in agricultural irrigation, wildlife habitat, and recreational areas. General Plan policies call for regular testing of water from the Mokelumne River for coliform and other contaminants.

Groundwater from the aquifers below Lodi serves all municipal uses, and is drawn by a series of wells throughout the city.

Flood Hazards

The City of Lodi participates in the Flood Insurance program operated by the Federal Emergency Management Agency (FEMA). FEMA produces Flood Insurance Rate Maps (FIRMs) that illustrate areas likely to be affected by 100-year and 500-year floods. The levee system along the Mokelumne River protects most of the Project area from effects of a 100-year flood. Only small portions of developed property immediately adjacent to the river are within the 100-year floodplain. Figure 3.6-1 illustrates portions of the Project area within the 100-year floodplain. The flood hazard map has not been updated for Lodi since 1987.

Storm Drainage

The City of Lodi provides a municipal storm drainage system to serve the Project area. This system consists of an integrated series of trunk lines, detention basins, and pump stations. Surface infrastructure such as gutters, alleys, and ditches provide for collection of storm water into the system. Ultimate discharge of collected storm water within Lodi is into the Mokelumne River or the Woodbridge Irrigation District (WID) canal.

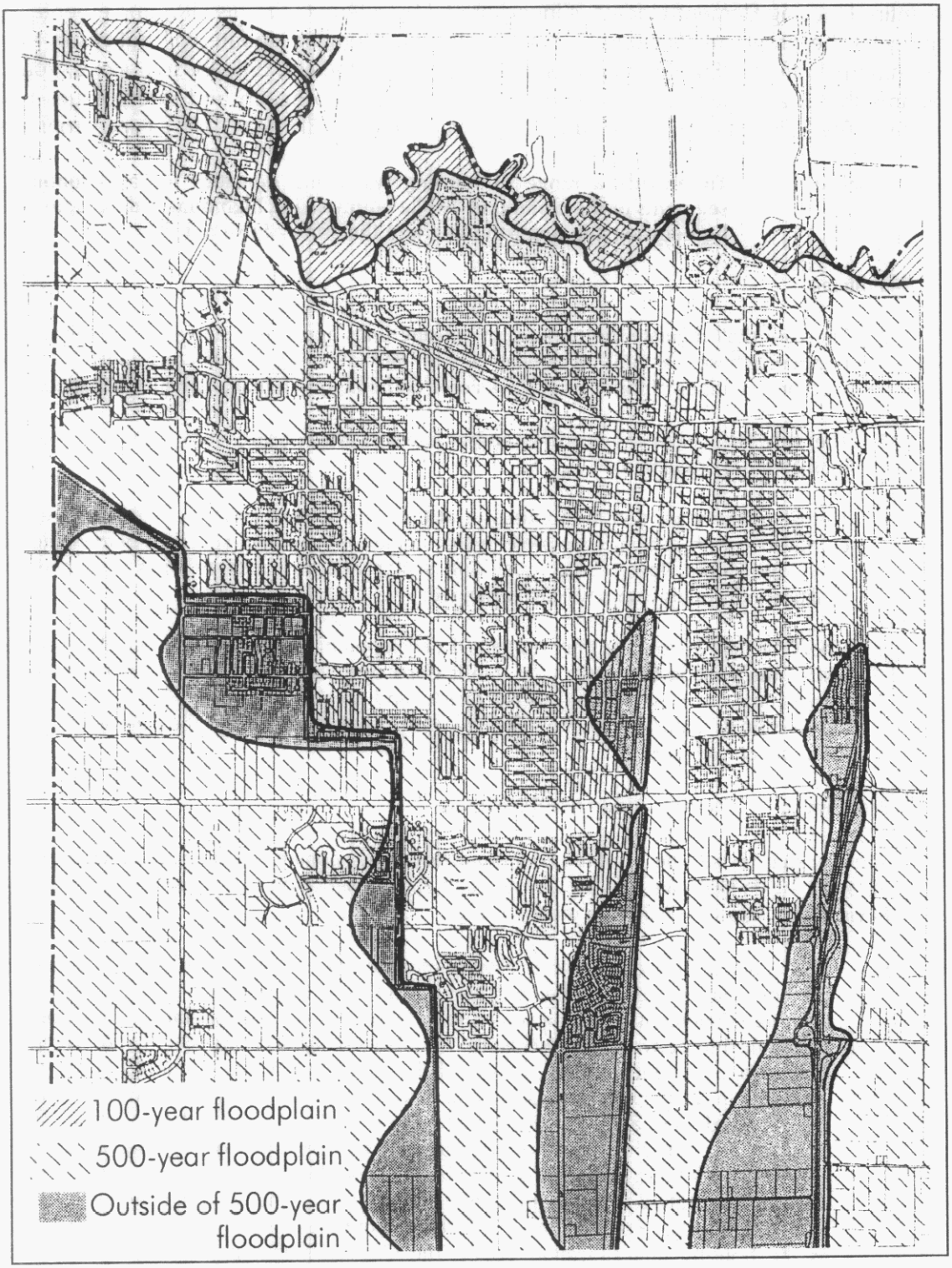
Detention basins are used to store stormwater runoff so that discharge into the Mokelumne River and WID canal can be done gradually, reducing potential flooding impacts. Design standards for new detention basins require that they be sufficient to accommodate 100-year, 48-hour floods. Many of the existing detention basins are not sufficient to meet this standard. Most basins within the Project area are operating at full capacity, although some remain available for expansion to accommodate additional growth in stormwater runoff and drainage.

Regulatory Background

Two agencies hold regulatory authority over water quality within the Project area. The California Department of Water Resources (DWR) and the Central Valley Regional Water Quality Control Board (CVRWQCB) each are charged with maintaining water quality and reducing potential impacts to water quality within the area. The California DWR controls use of Rivers and other surface waters, while the CVRWQCB monitors water quality and remediation.

The CVRWQCB is responsible for implementing the U.S. Environmental Protection Agency's National Pollution Discharge Elimination System (NPDES). The CVRWQCB has delegated responsibility over the NPDES compliance to the City of Lodi for issuance of compliance permits and monitoring. All projects resulting in the disturbance of more than five acres of land are required to obtain a NPDES permit, which includes mitigation for stormwater discharge impacts associated with the project.

Figure 3.6-1
Flood Hazard Areas



Source: Lodi General Plan Draft EIR

Methodology

The entire Housing Element Update is incorporated by reference in this EIR. Implementation of the majority of the programs included within the Housing Element Update will not result in potential environmental effects. For the purposes of this section of the EIR, only those policies, goals, and/or programs that may result in environmental effects related to health and safety issues have been analyzed. The following excerpt includes all relevant Housing Element policies and programs:

Goal A: **To provide a range of housing types and densities for all economic segments of the community while emphasizing high quality development, homeownership opportunities, and the efficient use of land.**

Policies

2. The City shall regulate the number of housing units approved each year to maintain a population-based annual residential growth rate of 2.0 percent, consistent with the recommendations of the Mayor's Task Force and the growth management ordinance.

4. The City shall exempt very low- and/or low-income housing units from the growth management ordinance.

9. The City shall grant density bonuses of at least 25 percent and/or other incentives in compliance with state law for projects that contain a minimum specified percentage of very low-income, low-income, qualifying senior housing units or units designed to facilitate individuals with physical challenged.

13. The City shall encourage infill residential development and higher residential densities within the existing City limits near transit stops, and compact development patterns in annexation areas to reduce public facility and service costs, avoid the premature conversion of natural resource and agricultural lands, and reduce the number of trips from private vehicles.

Program 1: **Zoning Ordinance Revisions**

The City shall revise Title 17 of the Lodi Municipal Code (Zoning Ordinance) to reduce barriers to, and provide incentives for, the construction and conservation of a variety of housing types. Revisions to Title 17 will include the following:

- The addition of a chapter that provides for density bonuses and other incentives for projects that include ten percent very low-income housing, 20 percent low-income housing, 50 percent qualifying senior housing, or 20 percent moderate-income hosing in condominium conversion projects, in compliance with Sections 65915 - 65918 of the California Government Code. The City shall work with the San Joaquin County Housing Authority in developing procedures and guidelines for establishing income eligibility for the "reserved" units and for maintaining the "reserved" units as affordable units for at least 30 years. The City shall seek Housing Authority administration of the reserved units. The City shall establish a program to publicize the availability of the density bonus program through the City's website, program information at the Community Development Department public counter, and pre-development meetings with housing providers (such as the housing unit allocation stage). The City shall encourage prospective housing developers to use the density bonus program at pre-development meetings. In

conjunction with density bonuses, the City will offer one or more regulatory incentives, as needed and appropriate.

- Addition of standards for emergency shelters and transitional housing to clearly identify appropriate zoning districts and locations for such facilities and to make these sites readily accessible. Until the adoption of such revisions to the Zoning Ordinance, the City will continue to allow by right the development of such facilities in areas zoned C-M or C-2.

- Clarification of standards for permitting residential care facilities (such as group homes). The City will specify that all such facilities with six or fewer residents are permitted in residential zoning districts. The City will also designated zoning districts in which facilities of seven or more persons will be permitted through a use permit and standards for such facilities.

- Revision of off-street parking requirements (Chapter 17.60) to allow for less than two spaces per multifamily dwelling unit with fewer than two bedrooms when justified due to the characteristics of the occupants (such as seniors, persons with disabilities, or low-income single working adults) and/or the project location (such as along a public transit route or in the downtown area).

- Revision of standards for second dwelling units to allow the conversion of accessory buildings to second units subject to compliance with all other zoning and parking standards, an appropriate minimum lot size for detached second units, and architectural compatibility with the main dwelling unit. The City will permit second dwelling units through an administrative permit process in compliance with state law (California Government Code section 65852.2).

- Elimination of single-family homes as permitted uses in the R-GA, R-MD, R-HD, and R-C-P zones, except on parcels constrained by lot size, environmental, or other factors that would make the construction of multifamily housing infeasible.

- Reduction in the number of non-residential uses permitted in multifamily residential zones to public and quasi-public uses and supportive services for multifamily residents.

Responsibility:	Community Development Department, Planning Commission, City Council
Timeframe:	Complete zoning code amendments as part of a new unified development code by June 2004.
Funding:	General Fund
Objective:	Reduce regulatory barriers to the provision of housing

Program 6: Encourage Efficient Use of Land for Residential Development

The City will investigate incentive and regulatory tools to encourage efficient use of land designated or held in reserve for urban development within the existing Lodi Sphere of Influence to reduce the premature conversion of agricultural land to urban use. If determined to be feasible, the City will adopt one or more incentives or regulations. Examples of approaches the City will study and consider are:

- A requirement to mitigate the loss of Prime Farmland through the payment of a fee. Fees collected by the City will be used to foster agricultural production in the Lodi area. This program may fund marketing, research, land acquisition and other programs necessary to promote agricultural production. An option that the City may consider to promote the production of affordable housing is to have this program tied to a sliding scale based on dwelling units per acre. If a development is at the Land Use Element mandated 65% Low Density/10% Medium Density/35% High Density, equivalent to 9.85 dwelling units per acre, then no fee would be collected, a higher density would be provided with a credit while a lower density would be subject to the fee.

- The use of transferred development rights (TDRs) that can be applied to designated areas within the Sphere of Influence. The TDRs might be combined with a density bonus program for agricultural preservation to increase the number of opportunities to use the TDRs. An option that the City of Lodi may consider is to designate sending and receiving areas. A potential sending area for the program could be approximately 0.25 miles south of Harney Lane to Armstrong Road in the area currently designated as Planned Residential Reserve by the Land Use Element of the General Plan. The receiving area for this program could then be designated to areas north of Harney Lane in the Planned Residential portion of the General Plan.

- The use of transitional land use categories, such as residential estates, to provide a further buffer between more intense urban land uses and agricultural land uses.

Responsibility:	Community Development Department, Planning Commission, City Council,
Timeframe:	Complete study and recommend incentives and regulations by June 2005; City Council to adopt incentives or regulations by December 2005.
Funding:	General Fund
Objective:	Preserve agricultural land and reduce the amount of land needed to meet future urban growth needs

Program 9: Annexation of Land to Accommodate Future Housing Needs

The City will work with property owners of approximately 600 acres outside the current City limits, but within Lodi's Sphere of Influence (SOI), to plan for, and annex the land to the City so that additional residential development opportunities can be provided to meet Lodi's future housing construction needs. The 600 acres is located between Harney Lane, Lower Sacramento Road, the Woodbridge Irrigation District canal, and the western SOI boundary. The City has facilitated a specific planning process with property owners of approximately 300 acres to prepare these sites for annexation to the City. The development potential for the properties to be annexed is summarized in Table II-1B.

The City does not need to annex all 600 acres within the next three to six years to meet housing construction needs given the backlog of unused housing allocations and available sites within the current City limits, but will initiate the process with property owners during the 2003 - 2009 period.

Responsibility:	Community Development Department, Planning Commission, City Council
Timeframe:	Annex initial 300 acres by December 2005; annex remaining land by December 2009.

Funding: Annexation and permit fees
Objective: Increase the City's residential development capacity to accommodate its share of the region's future housing construction needs between 2001 and 2009, and subsequent years, under the San Joaquin County Council of Governments housing allocation plan

Goal B: **To encourage the maintenance, improvement, and rehabilitation of the City's existing housing stock and residential neighborhoods, particularly in the Eastside area.**

Policies

5. The City shall support the revitalization of older neighborhoods by keeping streets and other municipal systems in good repair.

Program 18: Preservation ~~of the~~ Eastside Area

The City will continue to target a portion of its annual CDBG allocation for public improvements in the Eastside area in support of its housing rehabilitation and neighborhood improvement activities. The City will also maintain the Eastside single-family residential zoning as a regulatory tool to preserve the character of the neighborhood and encourage private investment in older homes.

Responsibility: Community Development Department, Planning Commission, City Council
Timeframe: Annual CDBG allocation, maintain zoning, 2003 - 2009
Funding: CDBG, permit fees, impact fees
Objective: To preserve and improve the Eastside area.

Thresholds of Significance

Based on CEQA Guidelines, the proposed project would have a significant drainage or water quality impact if it would:

- Violate any water quality standards or waste discharge requirements;
- Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level;
- Substantially alter the existing drainage pattern of an area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion, siltation, or flooding;
- Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems to provide substantial additional sources or polluted runoff;
- Otherwise substantially degrade water quality;

- Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map;
- Place within a 100-year flood hazard area structures that would impede or redirect flood flows;
- Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam; or
- Expose people or structures to inundation of seiche, tsunami, or mudflow.

Environmental Impact and Mitigation Measures

Impact HYDRO-1 Potential Impact on Water Quality

The pace of new development called for in the Housing Element may result in negative impacts to water quality. Water quality degradation could occur from increases in urban runoff and effluent discharge causes by urban development. Effluent discharge increases occur as a result of population growth, with wastewater disposal needs proportional to population increase. Increases in sewage into the treatment plant (White Slough Water Pollution Control Facility) will result in corresponding increases to discharge from that plant into area waterways, including Dredger Cut, the main disposal site for treated effluent.

Urban runoff results from the pavement of lands with non-porous materials, reducing the ability of the land to absorb water. This water runs along paved areas until reaching an area where soils allow for infiltration, or reaching a waterway. Urban pollutants such as hydrocarbons (oil and diesel gasoline), heavy metals (lead, cadmium, and nickel), fertilizers, and other chemicals can be transported by runoff into waterways and groundwater, thus degrading water quality.

In addition to these potential sources of water quality contamination, additional water quality impacts could occur with new construction activities. Construction of housing, infrastructure, roadways, and other improvements has the potential to increase sedimentation and erosion from construction site runoff.

The Transfer of Development Rights (TDR) program, open space preservation policies, and transitional land use categories called for in the Housing Element have the potential to affect water quality. These programs are designed to limit land use conflicts and preserve a suitable transition from urban to rural uses on the edges of the city. The impacts to water quality associated with implementation of each of these programs will depend heavily on the density and layout of developments. The flexibility inherent in these programs makes accurate assessment of potential impacts difficult.

Several provisions of the housing element are designed to reduce potential impacts on water quality. Reduction in land consumption associated with increased densities in some residential zones will help reduce the amount of impervious surface constructed and reduce the amount and time of construction necessary.

Impacts associated with the contamination and degradation of water quality are addressed in the Conservation Element of the General Plan, which sets forth policies to offset water quality impacts from new development. The following policies from the Conservation Element relate to water quality.

> ***Policy D-1***
> The City shall require developers to prepare an erosion and sediment control plan, prior to approving development, which includes features such as mitigation of sediment runoff beyond proposed project boundaries, and complete revegetation and stabilization of all disturbed soils (including details regarding seed material, fertilizer, and mulching).
>
> ***Policy A-1***
> The City, together with the County, shall monitor the water quality of the Mokelumne River and Lodi Lake to determine when the coliform bacteria standard for contact recreation and the Maximum Concentration Levels of Priority Pollutants, established by the California Department of Health Services (DHS), are exceeded...The City shall participate in implementing remedial action as feasible.
>
> **Policy A-5**
> The City shall regularly monitor water quality in municipal wells for evidence of contamination from DBCP, saltwater intrusion, and other toxic substances that could pose a health hazard to the domestic water supply.
>
> **Policy A-6**
> The City shall close or treat municipal wells that exceed the action level for DBCP.

Even with application of the Conservation Element policies, the overall impacts to water quality associated with the Housing Element are considered **potentially significant**, and will require mitigation.

Mitigation Measure HYDRO-1

All residential projects of one acre or more in size shall prepare a Storm Water Pollution Prevention Plan (SWPPP), as required by the Regional Water Quality Control Board under the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity. Prior to the start of construction, a SWPPP shall be prepared to address water quality impacts associated with construction of Project facilities and roadways. The Project Proponent shall incorporate into construction contract specifications the requirement that all contractors comply with and implement the provisions of the SWPPP. The objectives of the SWPPP are to identify pollutant sources that could affect the quality of stormwater discharge, to implement control practices to reduce pollutants in stormwater discharges, and to protect receiving water quality.

With incorporation of the above mitigation measure and continued application of City policies, the impacts related to degradation of water quality associated with the adoption of the Housing Element will be reduced to a level of **less than significant**.

Impact HYDRO-2 Exposure to Flood Hazards

Exposure of persons and structures to hazards of flooding is a potential impact associated with all urban development. Development of outlying areas, especially where located near watercourses, can result in potential exposure to seasonal flooding hazards.

The Federal Emergency Management Agency (FEMA) maintains maps of the 100-year floodplain, representing the areas of the community most likely to be adversely impacted by a major flood. The City has adopted numerous policies to address potential impacts of flooding on both existing and new development. The following relevant policies are provided from the Lodi General Plan Health and Safety Element.

Policy A-1
The City shall continue to participate in the National Flood Insurance Program and ensure that local regulations are in full compliance with standards adopted by FEMA.

Policy A-2
The City shall ensure that the storm drainage facilities are constructed to serve new development adequate to store runoff generated by a 100-year storm.

Policy A-3
The City shall ensure that storm drainage facilities are provided for all new development to make certain that all surface runoff generated by the development is adequately handled.

Policy A-4
The City shall evaluate the degree of flood protection afforded to currently developed areas compared to standards for new development.

Policy A-5
The City shall only permit structures in the 100-year floodplain consistent with FEMA regulations.

Policy A-6
The City shall not support approval of land uses or projects that have the potential of greatly increasing flood hazards in Lodi.

Policy A-7
The City shall support the implementation of flood hazard reduction measures in neighboring areas.

New policies and programs set forth in the Housing Element have the potential to increase density and location of new development in the city. The existing General Plan policies set forth in the Health and Safety Element are sufficient to ensure that both new and infill developments are not subjected to substantial adverse risks associated with flooding and flood hazards. The impact is considered **less than significant**.

Impact HYDRO-3 Increased Runoff Effects

Increasing density within developments will increase the amount of impervious surface associated with development and may affect surface hydrology and drainage. Adding impervious surfaces has the potential to increase the amount of runoff, the amount of contamination of urban chemicals and contaminants in runoff, and reduce groundwater recharge in residential areas. Existing municipal codes and standards require preparation of an erosion control plan, as well as consistency with the City's Drainage Master Plan and utilization of BMPs from the City's SWPPP. These existing requirements, along with those set forth in mitigation measure HYDRO-1 in this report, will educe potential impacts to a level of **less than significant**.

3.7 Land Use Planning, Agricultural and Visual Resources

The following section assesses the extent to which implementation of the updated Housing Element would adversely affect important agricultural or visual resources, conflict with adopted environmental policies, and create land use conflicts. Adopted policies that would reduce impacts are summarized. Where further impacts are identified, feasible mitigation is recommended.

Environmental Setting

Following is a description of land use and agricultural resources in Lodi and the surrounding area that would affect, or be affected by Project development.

Existing Land Use

Historically, Lodi has long been one of San Joaquin County's population centers, second only to Stockton. As of Lodi's 2003 population estimate of 60,521 people, Lodi was surpassed by Tracy to become the third largest city in the county. The Lodi General Plan Area includes approximately 11,929 acres.

Throughout the past decade, Lodi experienced a moderate rate of population growth at a time when surrounding jurisdiction's populations were nearly doubling. A major theme of the 1991 City General Plan is maintenance of Lodi's small-town character. Policies developed to implement this goal may be responsible for the more moderate pace of growth compared to surrounding communities.

While Lodi is surrounded by land subject to agricultural activities, the City's economy is mainly influenced by the manufacturing, retail, health care, and hospitality industries though only 36 percent of Lodi residents are employed within these industries. More than half of the residents commute outside of the city for work, a pattern that has become more common for San Joaquin County cities over the past decade.

The predominant land use in Lodi is residential. Approximately 70 percent of Lodi's housing stock consists of detached, single-family residences. Yet, in 2000, only 55 percent of Lodi residents were homeowners, slightly below the state average of 57 percent. The city is also comprised of commercial, office, industrial, public/quasi public land uses, as well as vacant land.

Agricultural Resources

Lodi is located in one of the most productive agricultural regions in the world, and a large portion of economic activity in the wider area is directly or indirectly related to the production, processing, or

sale of agricultural products of several varieties.

Agricultural Land Uses

As of 1987, 201 acres of city land was in agricultural use, mostly in the northeastern corner of the city, mixed in with industrial and light industrial uses.[1] Currently, approximately 100 acres of land in thee city is farmland, some of which is actively farmed and some of which is fallow. Within the Study Area for the Lodi General Plan, which includes land within the city limits and within Lodi's Sphere of Influence, 4,838 acres was in agricultural use (as of 1987). Currently, no land in the city has agricultural land use designations or agricultural zoning, and land currently in agricultural production is designated for eventual urban use.

Grapes are the most prevalent type of crop grown in San Joaquin County, (in terms of overall value) and milk is the top valued commodity overall. Corn, nuts, tomatoes, and alfalfa are additional crop types. The gross value of agricultural production for 2001 in San Joaquin County is approximately $1.4 million, a 4 percent increase from the estimated 2000 figure.[2]

The 1982 Department of Water Resources survey identified vineyards on the majority of agricultural lands surrounding Lodi, and to a lesser extent, deciduous fruit and nut operations, corn, and alfalfa.[3] (Refer to Figure 3.7-1 for illustration of agricultural lands in the western Lodi Sphere of Influence area and Figure 3.7-2 for agricultural lands in the southern Lodi Sphere of Influence area).

Figure 3.7-1
Agricultural Land in Western Lodi Sphere of Influence Area

Source: GlobeXplorer Airphoto USA, 2003, www.mapquest.com.

Important Farmland

Farmland of Local Importance is land that is determined by each county's local advisory committee (and adopted by its Board of Supervisors) to be important to the local economy. Farmland of Local Importance is, or has the potential to be, agriculturally productive, but *does not* meet the criteria of Prime Farmland, Farmland of Statewide Importance, or Unique Farmland. Farmland of Local Importance in San Joaquin County includes all farmable land within San Joaquin County not meeting the definitions of "Prime Farmland," "Farmland of Statewide Importance," or "Unique Farmland." This includes land that is, or has been used for irrigated pasture, dry land farming, confined livestock or dairy facilities, aquaculture, poultry facilities, and dry grazing, including lands with soils *previously* designated as "Prime Farmland," "Farmland of Statewide Importance," and "Unique Farmland" that has since become idle.[4]

According to the State Department of Conservation, 2,533 acres of important farmland in the County were converted to urban use between 1996 and 1998, and another 2,345 acres were converted between 1998 and 2000.[5] This conversion is predominantly a result of housing, commercial and industrial development in areas adjacent to Tracy, Stockton, Manteca, and Lodi.[6]

Figure 3.7-2
Agricultural Land in Southern Lodi Sphere of Influence Area

Nuisance Issues

Urban encroachment upon agricultural areas introduces issues such as land use conflicts, vandalism, increased land values and taxes, and other issues. The State recognized potential land use conflicts, and through AB 1190 (Chapter 97, Statutes of 1992), attempted to avoid impact to agricultural operations associated with urban uses "coming to a nuisance." By amending provisions of the Civic Code of the State of California, under AB 1190, existing agricultural processing facilities do not constitute a nuisance, provided they operate in a manner consistent with historic operations.

Important Visual Features

The agricultural lands surrounding the city are an important aesthetic resource, especially the vineyards.[7] Lodi's tree-lined streets are a valuable aesthetic resource, as are the older homes and other historic structures in and around downtown and the public parks and public spaces.[8] The Mokelumne River and associated riparian areas in the northern portion of Lodi are considered a valuable natural aesthetic resource, as well (refer to Figure 2-1, Regional Location).

Regulatory Background

Relevant policies and regulations guiding land use in Lodi and its Sphere of Influence are discussed below.

Land Use Planning and CEQA

The California Environmental Quality Act (CEQA) establishes that a significant effect on the environment is an adverse change to the physical environment. In CEQA documents, land use is evaluated in terms of compatibility with existing land uses and consistency with local plans and other local land use controls (general plans, zoning codes, specific plans, etc.), which are summarized below. State agencies involved in land use regulation and planning include the California Department of Transportation (Caltrans), California Department of Forestry and Fire Protection (CDF), California Department of Conservation, and California Department of Fish and Game (CDFG).

The California Land Evaluation and Site Assessment (LESA) Model is used by many lead agencies in assessing agricultural land conversions quantitatively in the environmental review process (Public Resources Code Section 21095), including in CEQA review. The LESA is a point-based approach for rating the relative importance of agricultural land resources, and considers soil quality, parcel size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. For a given project, the factors are rated, weighted, and combined, resulting in a single numeric score. The score associated with the agricultural resource becomes the basis for making a determination of a project's potential significance.

Growth Management

The City's General Plan establishes a growth management program implemented by the City through Ordinance 1521, which regulates residential growth to two percent per year through 2007 and designates residential land sufficient to meet the City's needs. Given that Lodi will continue to grow after 2007, the General Plan also establishes "reserve" land; land designated for development of specific land use types, which is recognized for development in the future.

To ensure a two percent growth rate per year, Lodi established a residential permit allocation system. The residential allocation system establishes the number of units that can be permitted on a yearly basis. The system is applied to all residential projects of five dwellings or more, except senior

housing developments. Housing units constructed on individual lots that existed prior to the adoption of Ordinance 1521 or in new subdivisions or multi-family projects of one to four housing units are exempt from the annual allocation limit.

According to the City's General Plan Background Report, Measure A, is intended to: "preserve and protect agricultural land; preserve the scenic resources of the area; protect wildlife habitats and natural resources; and, to maintain the small-city character of Lodi within the designated Greenbelt."[9]

General Plan Policies

Lodi's 1991 General Plan policies that would reduce land use, aesthetic resources, and agricultural resources impacts are summarized below. The policies may be employed in developing mitigation measures for the Project, and, since assessment of visual resources impacts is somewhat subjective, the policies are utilized to guide characterization of visual impacts.

Agricultural Resources

Section 3/Land Use and Growth Management Element:

Goal B:

To preserve agricultural land surrounding Lodi and to discourage premature development of agricultural land with nonagricultural uses, while providing for urban needs.

Policies to Support Goal B:

1. The City shall encourage the preservation of agricultural land surrounding the City.
2. The City should designate a continuous open space greenbelt around the urbanized area of Lodi to maintain and enhance the agricultural economy.
3. The City should cooperate with San Joaquin County and the San Joaquin County LAFco to ensure that the greenbelt is maintained.
4. The City shall support the continuation of agricultural uses on lands designated for urban uses until urban development is imminent.
5. The City shall promote land use decisions within the designated urbanized area that allow and encourage the continuation of viable agricultural activity around the City.
6. The City shall encourage San Joaquin County to retain agricultural uses on lands adjacent to the City.

Relevant Implementation Programs:

10. The City shall coordinate with San Joaquin County and the City of Stockton to identify and designate an agricultural and open space greenbelt around the urbanized area of the City.
11. The City shall establish an ongoing process by which it will coordinate its planning with San Joaquin County and the City of Stockton to ensure consistency with their plans.

Section 7/Conservation Element:

Goal C:

To promote the economic viability of agriculture in and surrounding Lodi and to discourage the premature conversion of agricultural lands to nonagricultural uses, while providing for urban needs.

Policies to Support Goal C:

1. The City shall ensure, in approving urban development near existing agricultural lands, that such development will not constrain agricultural practices or adversely affect the economic viability of adjacent agricultural practices.
2. The City shall require new development to establish buffers between urban development and productive agricultural uses consistent with the recommendations of the San Joaquin County Department of Agriculture.
3. The City shall adopt a "right-to-farm" ordinance for the purpose of protecting agricultural land from nuisance suits brought by surrounding landowners.
4. The City shall support economic programs established by San Joaquin County for farm preservation.

Relevant Implementation Programs:

7. The City shall adopt a "right-to-farm" ordinance.

Visual Resources/Land Use Compatibility

Section 10/Urban Design and Cultural Resources Element:

Goal A:

To provide a strong and clear definition to the edges and overall form of the City.

Policies to Support Goal A:

1. The City should designate a continuous open space greenbelt around the urbanized area of Lodi to maintain visual definition and a clearly delineated edge to the City's urbanized area within its agricultural and rural setting, and to protect the scenic resources of the surrounding rural, agricultural, and natural landscape (including the Lodi Lake Park and the Mokelumne River corridor).
2. The City shall formulate an Urban Design Plan to guide the overall three-dimensional organization and quality of the physical development. This plan shall be designed to achieve the following objectives:
   - Identify and protect the major physical features that serve to define Lodi's small-town character, such as the parks, boulevards, public and civic areas, historic downtown, and historic/older buildings;
   - Identify and maintain the primary physical features that give the City its overall visual image and scenic quality, such as the street trees, older residential neighborhoods, surrounding agricultural lands, river corridor, and civic buildings;
   - Identify and enhance the principal physical elements that give the City its basic form and structure, such as the Central Business District (CBD), key major streets, and railroad corridors;
   - Organize the open space areas into a coherent system, including parks, schools, civic area, open space, and greenbelts within developments; and,
   - Establish an interconnected system of pedestrian and bicycle paths linking scenic

resources with other uses.

3. The City shall revise its Site Plan and Architectural Review Guidelines to ensure consistency with the Urban Design Plan.

Goal C:

To maintain and enhance the aesthetic quality of major streets and public/civic areas.

Policies to Support Goal C:

1. The City shall develop special design standards to upgrade roadways, including SR 12 and SR 99. Such standards shall include provisions for setbacks, signs, landscaping, parking, and upgrading commercial development along these streets, and screening of visually unattractive commercial and industrial uses.
2. The City shall develop a street tree program, with an emphasis on enhancing major arterial streets and unifying the CBD, civic center, and other public areas. The street tree program should include strategies for providing street trees through boulevard plants on City property, developer-provided plantings on either City property or private property (front yards), and City-furnished, planted, and maintained trees on private property (front yards).

Goal E:

To maintain and enhance the aesthetic quality of the CBD and civic center, to maintain a clear definition and distinction between the CBD and the surrounding areas, and to preserve the small-town character.

Policies to Support Goal E:

1. The City shall prepare and adopt a CBD/Civic Center Design Plan as part of the citywide Urban Design Plan as set forth in Policy A-2. The plan should be designed to achieve the following objectives:
   - Assess the urban design potential of each of the vacant parcels in the CBD and establish an overall urban design strategy;
   - Provide a clearer visual and functional link between the CBD and civic center through unified street lights, street trees, street furniture, and parking;
   - Ensure that parking lots do not destroy or dominate the fabric of the CBD/civic center area including avoiding parking lots at street intersections;
   - Provide unified landscaping (including street trees) in the CBD;
   - Establish design standards and design review procedures for ensuring that the height, bulk, setbacks, facades, entryways, signs, and pedestrian areas (such as courtyards and walkways) contribute to creating a coherent, attractive, and lively CBD;...
   - Upgrade the visual quality of the SPRR corridor within the CBD, particularly between East Pine Street and East Elm Street, through measures such as landscaping , improved building maintenance, and converting building uses from industrial to retail uses (including converting the SPRR Depot into a civic-related function); and,
   - Provide stronger visual and pedestrian linkages between the CBD/civic center and adjacent City parks, schools, and other open spaces.

Goal F:

To preserve existing community character and fabric, and promote the creation of a small-

town atmosphere in newly developing areas.

Policies to Support Goal F:

1. *The City shall respect existing neighborhood scale and character when infilling and/or* upgrading existing residential areas;
2. The City shall promote the creation of well-defined residential neighborhoods in newly developing areas. Each of these neighborhoods should have a clear focal pint, such as a park, school, or other open space and community facilities, and should be designed to promote pedestrian convenience.
3. The visual impact of automobiles shall be minimized in all new development...
5. Open space provide within new developments shall be configured to link with existing urban open space.

Relevant Implementation Programs:

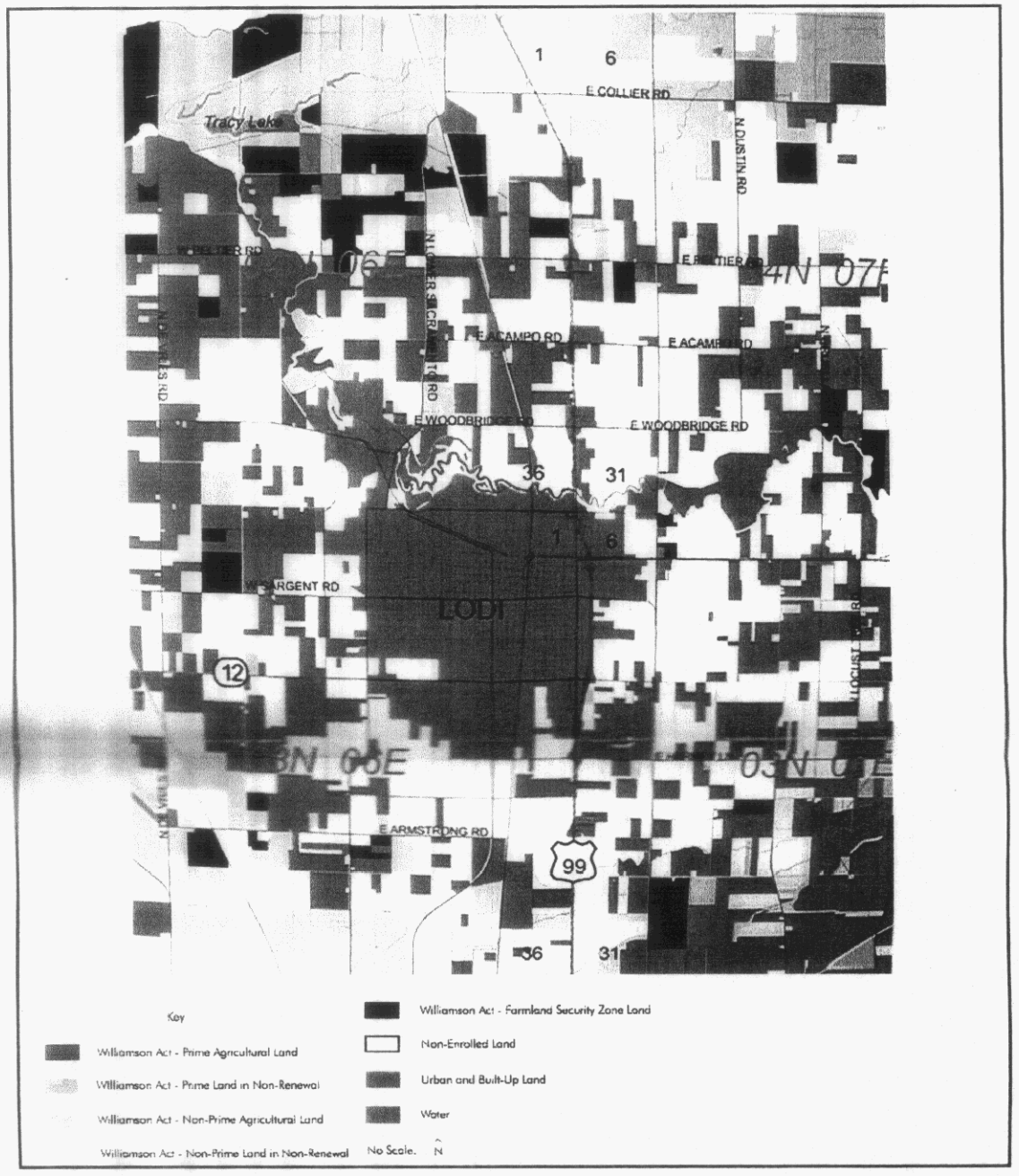
1. The City shall adopt and periodically update an Urban Design Plan consistent with the objectives outlined in Policy A-2.
3. The City shall develop and adopt design standards for roadways consistent with the objectives outlined in Policy C-1.
4. The City shall develop and adopt a street tree and civic area landscape program consistent with the objectives outlined in Policy C-2.
6. The City shall formulate and adopt a CBD/Civic Center Design Plan consistent with the objectives outlined in Policy E-1.
7. The City shall appoint a Citizens' Task Force to oversee the formulation of the CBD/Civic Center Design Plan.

Though some of these policies are very general, depending upon the degree to which they are implemented through zoning, land use, subdivision, and development application processing decisions, these policies have the potential to substantially reduce unnecessary conversion of agricultural lands. The City's intent to identify and reserve land for agriculture is a stabilizing force in agricultural production. With appropriate land use designations, zoning designations, and clear indications of where rezoning and general plan amendments would and would not be allowed and where annexation would and would not be appropriate, the City has reduced the likelihood of *unnecessary loss of productive agricultural land. Decisions about urban land use density,* location of infrastructure, management of growth, and similar decisions not directly related to the use of agricultural land would also have substantial impacts on the future loss of agricultural land. The City has indicated that it will coordinate with the County on land use decisions. Most of the City's Sphere of Influence is designated as Agricultural Urban Reserve, with areas beyond that designated as General Agriculture.

Williamson Act Program

The Williamson Act establishes a mechanism for contracts between local governments and private landowners, restricting parcels of land to agricultural or related open space use. Landowners are taxed on the farming and open space land value instead of the full market value, and local governments receive an annual subvention of forgone property tax revenues from the State via the Open Space Subvention Act of 1971. Figure 3.7-3 illustrates the location of Williamson Act properties near the city.

Figure 3.7-3
Williamson Act Properties near Lodi, 2002



Notes:
Williamson Act - Prime Agricultural Land = Land enrolled under California Land Conservation Act contract which meets any of the following criteria: 1) Land which is class I or class II in the Natural Resources Conservation; 2) Service land use capability classification system; 3) Land which rates 80 to 100 in the Stone Index Rating system; 4) Land which supports livestock used for the production of food and fiber and which has an annual carrying capacity equivalent to at least one animal unit per acre as defined by the United Stales Department of Agriculture; 5) Land planted with fruit or nut-bearing trees, vines, bushes or crops, which have a nonbearing period of less than five years and which will normally return during the commercial bearing period on an annual basis from the production of unprocessed agricultural plant production not less than two hundred dollars per acre; or 6) Land returned from the production of unprocessed agricultural plant production having an annual gross value of not less than two hundred dollars per acre for three of the previous five years.
Williamson Act - Non-Prime Agricultural Land = Land enrolled under California Land Conservation Act contract which does not meet any of the criteria for classification as Prime Agricultural Land. Non-Prime Land is defined as Open Space Land of Statewide Significance under the California Open Space Subvention Act and may be identified as such in other documents. Most Non-Prime Land is in agricultural uses such as grazing or non-irrigated crops. However, Non-Prime Land may also include other open space uses which are compatible with agriculture and consistent with local general plans.
Williamson Act - Land in Non-Renewal = A Notice of Non-Renewal starts the non-renewal period. During the Non-renewal process, the annual tax assessment gradually increases. At the end of the non-renewal period, the contract is terminated
Williamson Act – Farmland Security Zone Land = A Farmland Security Zone is an area created within an Agricultural Preserve by a Board of Supervisors upon request by a land owner or group of land owners. The minimum initial term for (he contract is 20 years. Agricultural Preserves allow local jurisdictions to designate priority areas for farmland and open space conservation. The establishment of a preserve indicates the willingness of the jurisdiction to enroll parcels within the preserve under the Williamson Act contract. Agricultural Preserves must generally t>e at least 100 acres in size.
Non-Enrolled Land = County land not enrolled with the Williamson Act Program
Urban and Built-up Land = Land occupied by structures with a density of at least one unit to one and one-half acre. Developed Land data is provided by the Department of Conservation's Farmland Mapping and Monitoring Program
Source: Department of Conservation, 2003.

San Joaquin LAFCO

The San Joaquin Local Agency Formation Commission (LAFCO) coordinates logical and timely changes in local governmental boundaries, including:

- Annexations and detachments of territory;
- Incorporations of cities;
- Formations of special districts; and
- Consolidations, mergers, and dissolutions of districts.

The LAFCO also oversees development and updating of spheres of influence (SOI) for cities and special districts in the county. Territory must be within a city or district's sphere in order to be annexed. LAFCo's powers, procedures, and functions are set forth in the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000.

State law requires input from affected agencies and the public for all jurisdictional boundary changes. Also, LAFCO must comply with CEQA when considering boundary change proposals.

LAFCO guidelines for reviewing proposed revisions to agency structure (including annexation) include:[10]

- Local agencies should be so constituted and organized as to best provide... controls required to conserve environmental resources;
- The public interest shall be served by considering "resource" in a broad sense to include ecological factors such as open space, wildlife and agricultural productivity in addition to the commonly accepted elements of land, water, and air;
- Annexations to agencies providing urban services shall be progressive steps toward filling in the territory designated by the affected agency's adopted Sphere of Influence;
- Proposed growth shall be from inner toward outer areas;
- A proposal establishing urban encroachment of areas designated by the County General Plan for open space or agricultural use will be opposed unless it complies with a previously adopted Sphere of Influence of an incorporated City;

Methodology

The entire Housing Element Update is incorporated by reference to this EIR. Implementation of the majority of the programs included within the Housing Element Update will not result in potential environmental effects. For the purposes of this section of the EIR, only those policies, goals, and/or programs that may result in environmental effects related to land use planning, agricultural resources, and visual resources have been analyzed. Mitigation measures included in the General Plan EIR that would reduce impacts to land use planning, agricultural resources, and visual resources are not altered by the Housing Element or the Housing Element EIR and are considered as a part of the impact analysis in this section. The following excerpt includes all relevant Housing Element goals, policies, and programs (including policies and programs that would reduce potential land use, visual resources, and agricultural resources impacts, such as Goal A, Program 6, which establishes a Prime Farmland mitigation fee process):

Goal A: **To provide a range of housing types and densities for all economic segments of the community while emphasizing high quality development, homeownership opportunities, and the efficient use of land.**

Policies:

2. The City shall regulate the number of housing units approved each year to maintain a population-based annual residential growth rate of 2.0 percent, consistent with the recommendations of the Mayor's Task Force and the growth management ordinance.

3. The City shall continue to exempt senior citizen housing projects from the growth management ordinance.

4. The City shall exempt very low- and/or low-income housing units from the growth management ordinance.

10. The City shall seek to intersperse very low- and low-income housing units within new residential developments and shall ensure that such housing is visually indistinguishable from market-rate units.

Programs:

Program 1: Zoning Ordinance Revisions

The City shall revise Title 17 of the Lodi Municipal Code (Zoning Ordinance) to reduce barriers to, and provide incentives for, the construction and conservation of a variety of housing types. Revisions to Title 17 will include the following:

a. The addition of a chapter that provides for density bonuses and other incentives for projects that include ten percent very low-income housing, 20 percent low-income housing, 50 percent qualifying senior housing, or 20 percent moderate-income hosing in condominium conversion projects, in compliance with Sections 65915 - 65918 of the California Government Code. The City shall work with the San Joaquin County Housing Authority in developing procedures and guidelines for establishing income eligibility for the "reserved" units and for maintaining the "reserved" units as affordable units for at least 30 years. The City shall seek Housing Authority administration of the reserved units. The City shall establish a program to publicize the availability of the density bonus program through the City's website, program information at the Community Development Department public counter, and pre-development meetings with housing providers (such as the housing unit allocation stage). The City shall encourage prospective housing developers to use the density bonus program at pre-development meetings. In conjunction with density bonuses, the City will offer one or more regulatory incentives, as needed and appropriate, such as:

    - Reduced parking for projects oriented to special needs groups and/or located close to public transportation and commercial services;

    - Expedited permit processing; or

    - Deferral of fees for an appropriate time period to allow for the project to begin generating income.

b. Conformance with California Government Code sections 65852.3 and 65852.7, which require that manufactured homes in single-family zones on permanent foundations be permitted under the same standards as site-built homes (with limited exceptions) and that mobilehome parks be permitted in any residential zone (although the City may require a use permit).

c. Addition of standards for emergency shelters and transitional housing to clearly identify appropriate zoning districts and locations for such facilities and to make these sites readily accessible. Until the adoption of such revisions to the Zoning Ordinance, the City will continue to allow by right the development of such facilities in areas zoned C-M or C-2.

d. Addition of a definition of farmworker housing that does not conflict with state law definitions for employees housing (beginning with California Government Section 17000) and specification of the zoning districts and standards under which such housing will be permitted.

e. Clarification of standards for permitting residential care facilities (such as group homes). The City will specify that all such facilities with six or fewer residents are permitted in residential zoning districts. The City will also designated zoning districts in which facilities of seven or more persons will be permitted through a use permit and standards for such facilities.

f. Revision of off-street parking requirements (Chapter 17.60) to allow for less than two spaces per multifamily dwelling unit with fewer than two bedrooms when justified due to the characteristics of the occupants (such as seniors, persons with disabilities, or low-income single working adults) and/or the project location (such as along a public transit route or in the downtown area).

g. Revision of standards for second dwelling units to allow the conversion of accessory buildings to second units subject to compliance with all other zoning and parking standards, an appropriate minimum lot size for detached second units, and architectural compatibility with the main dwelling unit. The City will permit second dwelling units through an administrative permit process in compliance with state law (California Government Code section 65852.2).

h. Elimination of single-family homes as permitted uses in the R-GA, R-MD, R-HD, and R-C-P zones, except on parcels constrained by lot size, environmental, or other factors that would make the construction of multifamily housing infeasible.

i. Reduction in the number of non-residential uses permitted in multifamily residential zones to public and quasi-public uses and supportive services for multifamily residents.

Responsibility: Community Development Department, Planning Commission, City Council
Timeframe: Complete zoning code amendments as part of a new unified development code by June 2004.
Funding: General Fund
Objective: *Reduce regulatory barriers to the provision of housing*

Program 2: Revise Growth Management Program

The City will revise its growth management program to exempt housing units affordable to very low- or low-income households with long-term affordability restrictions.

Responsibility: Community Development Department
Timeframe: Begin second round of allocations, if needed, in 2005 and annually thereafter
Funding: Application fees
Objective: Expedite the residential development approval process

Program 4: Land Inventory

The City shall prepare and maintain a current inventory of vacant, residentially zoned parcels and a list of approved residential projects, and shall make this information available to the public and developers, including information on underutilized sites within the downtown area with residential or mixed-use development potential. The City shall update the inventory and list at least annually. The City will promote the land inventory and the availability of each update through the City's web site, a notice at the Community Development Permit Counter, and a press release subsequent to each update.

To encourage the maximum efficient use of land within the current City limits, Lodi will also conduct a study of residential development potential on underutilized industrial and commercial sites along Cherokee Lane, South Sacramento Street, South Stockton Street, and West Kettleman Lane. Properties along these corridors may be suitable for future residential development if sufficient land can be consolidated to make such development feasible (see Figures 2-3 through 2-5, which follow). These areas are characterized by obsolete patterns of land development, older structures in substandard condition, odd-sized lots, and marginally viable commercial and industrial uses that would make properties ripe for redevelopment in the next five to ten years. If Lodi determines that residential development is feasible along these streets, the City will initiate a planning process with property owners (which may be a special area plan or a specific plan meeting state law requirements) to define specific properties suitable for residential or mixed-use development, appropriate development standards, and improvements needed to support residential development.

Responsibility: Community Development Department, Planning Commission, City Council
Timeframe: Complete study of residential development potential by December 2006; prepare and adopt area plan(s) by December 2009.
Funding: General Fund, contributions from property owners
Objective: Increase the potential for infill development, thereby reducing the need to prematurely annex land and convert agricultural land to urban use

Program 6: Encourage Efficient Use of Land for Residential Development

The City will investigate incentive and regulatory tools to encourage efficient use of land designated or held in reserve for urban development within the existing Lodi Sphere of Influence to reduce the premature conversion of agricultural land to urban use. If determined to be feasible, the City will adopt one or more incentives or regulations. Examples of approaches the City will study and consider are:

- A requirement to mitigate the loss of Prime Farmland through the payment of a fee. Fees collected by the City will be used to foster agricultural production in the Lodi area. This program may fund marketing, research, land acquisition and other programs necessary to promote agricultural production. An option that the City may consider to promote the production of affordable housing is to have this program tied to a sliding scale based on dwelling units per acre. If a development is at the Land Use Element mandated 65% Low Density/10% Medium Density/35% High Density, equivalent to 9.85 dwelling units

per acre, then no fee would be collected, a higher density would be provided with a credit while a lower density would be subject to the fee.

- *The use of transferred development rights (TDRs) that can be applied to designated* areas within the Sphere of Influence. The TDRs might be combined with a density bonus program for agricultural preservation to increase the number of opportunities to use the TDRs. An option that the City of Lodi may consider is to designate sending and receiving areas. A potential sending area for the program could be approximately 0.25 miles south of Harney Lane to Armstrong Road in the area currently designated as Planned Residential Reserve by the Land Use Element of the General Plan. The receiving area for this program could then be designated to areas north of Harney Lane in the Planned Residential portion of the General Plan.

- The use of transitional land use categories, such as residential estates, to provide a further buffer between more intense urban land uses and agricultural land uses.

Responsibility: Community Development Department, Planning Commission, City Council,
Timeframe: Complete study and recommend incentives and regulations by June 2005; City Council to adopt incentives or regulations by December 2005.
Funding: General Fund
Objective: *Preserve agricultural land and reduce the amount of land needed to meet* future urban growth needs

Program 9: Annexation of Land to Accommodate Future Housing Needs

The City will work with property owners of approximately 600 acres outside the current City limits, but within Lodi's Sphere of Influence (SOI), to plan for, and annex the land to the City so that additional residential development opportunities can be provided to meet Lodi's future housing construction needs. The 600 acres is located between Harney Lane, Lower Sacramento Road, the Woodbridge Irrigation District canal, and the western SOI boundary. The City has facilitated a specific planning process with property owners of approximately 300 acres to prepare these sites for annexation to the City. The development potential for the properties to be annexed is summarized in Table II-1B.

The City does not need to annex all 600 acres within the next three to six years to meet housing construction needs given the backlog of unused housing allocations and available sites within the current City limits, but will initiate the process with property owners during *the 2003 - 2009 period.*

Responsibility: Community Development Department, Planning Commission, City Council
Timeframe: Annex initial 300 acres by December 2005; annex remaining land by December 2009.
Funding: Annexation and permit fees
Objective: Increase the City's residential development capacity to accommodate its share of the region's future housing construction needs between 2001 and 2009, and subsequent years, under the San Joaquin County Council of Governments housing allocation plan

Goal B: **To encourage the maintenance, improvement, and rehabilitation of the City's existing housing stock and residential neighborhoods, particularly in the Eastside area.**

Policies:

2. The City shall prohibit the conversion of existing single-family units to multifamily units on residentially zoned properties less than 6,000 square feet.

3. The City shall use available and appropriate state and federal funding programs and collaborate with nonprofit organizations to rehabilitate housing and improve older neighborhoods.

4. Housing rehabilitation efforts shall continue to be given high priority in the use of Community Development Block Grant (CDBG) funds, especially in the Eastside area.

5. The City shall support the revitalization of older neighborhoods by keeping streets and other municipal systems in good repair.

8. The City shall continue to enforce residential property maintenance standards.

Program 13: Housing Rehabilitation and Code Enforcement

The City will continue to combine code enforcement and housing rehabilitation assistance, targeted to the Eastside area. The City will promote its program through the Eastside Improvement Committee, a neighborhood organization that provides direct outreach to area residents and property owners, by providing information at the Community Development Department's public counter, and through a link to the program on the City's website. The City's Community Improvement Manager will work with the Committee to continue marketing the program to Eastside area residents and property owners.

Responsibility: Community Development Department
Timeframe: Current and ongoing, 2003 - 2009
Funding: CDBG and HOME, CalHOME
Objective: Improvement of 1,000 housing units (including private investment to correct code violations) over five years

Program 14: Property Maintenance and Management Standards

The City will continue to implement standards for private property maintenance (Chapter 15.30 of the Municipal Code) to 1) control or eliminate conditions that are detrimental to health, safety, and welfare; 2) preserve the quality of life and alleviate certain socioeconomic problems created by physical deterioration of property; and 3).protect property values and further certain aesthetic considerations for the general welfare of all residents of the City of Lodi.

Responsibility: Community Development Department
Timeframe: Code enforcement on both complaint and pro-active basis, 2003 - 2009
Funding: Inspection fees, code violation penalties, CDBG funds (for dwelling units occupied by low-income households)
Objective: Eliminate substandard building and property conditions

Program 17: Mobilehome Park Preservation

Lodi will meet with mobilehome park owners to discuss their long-term goals for their properties and the feasibility of preserving these parks. Feasibility will be evaluated based on the condition of park infrastructure and buildings, the condition of mobile homes located in the park, parcel size, accessibility to services, and surrounding land uses. Several of the parks

are small (with fewer than 50 spaces) and may not be prime candidates for preservation. For those parks that are feasible to preserve, the City will:

- Assist property owners in accessing state and federal funds for park improvements by preparing funding requests, providing information to park owners on state and federal programs, and/or providing referrals to nonprofit organizations who can assist in preparing funding requests.

- Facilitate a sale to park residents of those mobile home parks the City has targeted for preservation and whose owners do not desire to maintain the present use. If necessary to facilitate a sale, the City will seek state and federal funding to assist residents in purchasing, improving, and managing their parks and/or seek the assistance of a nonprofit organization with experience in mobile home park sales and conversion to resident ownership and management.

The City shall also require, as condition of approval of change of use, that mobilehome park owners who desire to close and/or convert their parks another use provide relocation or other assistance to mitigate the displacement of park residents, as required by California Government Code Section 65863.7. The City shall also require the park owner to provide evidence of resident notification of intent to close and/or convert the mobilehome park, as required by state law.

Responsibility: Community Development Department
Timeframe: Meet with property owner and other interested parties by December 2004
Funding: CDBG, HOME California Housing Finance Agency HELP program, California Mobilehome Park Resident Ownership Program
Objective: To preserve approximately 400 mobilehomes and spaces in mobilehome parks with the highest feasibility for continued operation

Program 18: Preservation of the Eastside Area

The City will continue to target a portion of its annual CDBG allocation for public improvements in the Eastside area in support of its housing rehabilitation and neighborhood improvement activities (see Figure 2-6). The City will also maintain the Eastside single-family residential zoning as a regulatory tool to preserve the character of the neighborhood and encourage private investment in older homes.

Responsibility: Community Development Department, Planning Commission, City Council
Timeframe: Annual CDBG allocation, maintain zoning, 2003 - 2009
Funding: CDBG, permit fees, impact fees
Objective: To preserve and improve the Eastside area.

Goal C: **To ensure the provision of adequate public facilities and services to support existing and future residential development.**

Program 21: Growth Management Program

The City will continue to use its growth management program to insure that the pace of development is consistent with the City's, the Lodi Unified School District's, and other public facility and service providers' abilities to provide public facilities and services and maintain minimum facility and service standards for the entire community. The City will contact other

public facility and service providers annually during the housing unit allocation process to insure that these agencies can serve the increased number of housing units to be allocated.

Responsibility: Community Development Department, Planning Commission, City Council
Timeframe: Annually during housing allocation process, 2003 - 2009
Funding: Application fees, development impact fees
Objective: To provide public facilities and services meeting minimum City standards

Thresholds of Significance

The Project will have a significant impact if it will:

- Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project, adopted for the purpose of avoiding or mitigating an environmental effect (i.e., if it would be inconsistent with any of the City of Lodi General Plan policies;
- Physically divide an established community;
- Induce substantial growth in an area either directly or indirectly (e.g., through projects in an undeveloped area or extension of major infrastructure);
- Result in the conversion to non-agricultural use any lands identified as significant (point value of 80 or greater) in accordance with the California Department of Conservation Land Evaluation and Site Assessment (LESA);
- Conflict with existing zoning for agricultural use, or a Williamson Act contract;
- Have a substantial adverse effect on scenic vistas or scenic resources; or,
- Create a new source of substantial light or glare.

Environmental Impact and Mitigation Measures

Impact LU-1 Consistency with Land Use Policy, Zoning, Williamson Act, Conversion of Agricultural Land

The Lodi Housing Element is part of the City's General Plan, a comprehensive policy statement regarding the physical, economic, and social development of the City. The Housing Element is being updated separately from the General Plan, which is common because of State housing law requirements. The Housing Element identifies certain changes to land use policy and zoning regulations to which the City will commit, with the intent of accommodating its regional housing need. This commitment to meeting the City's regional housing need may involve changes to local policy that was enacted to reduce environmental impacts of development projects.

Annexation of fertile farmland west and south of Lodi may conflict with City and County policies intended to preserve important farmland for agricultural, economic, and aesthetic purposes. Increased density and infill may make City level of service standards more difficult to achieve and may conflict with City urban design goals that emphasize the importance of Lodi's small town, rural character. Infill residential development and residential development on vacant or underutilized land may conflict with city policies regarding noise exposure. Annexation of County lands west of Lodi may conflict with Williamson Act requirements, according to maps provided by the California Department of Conservation.

To promote a uniform and compatible vision for the development of the community, the General Plan must be internally consistent in its goals and policies as required by California Government Code Section 65300.5. Government Code section 65583(c) requires that a housing element describe how consistency has been achieved among the general plan elements. The most important aspect of consistency among general plan elements is that policies and implementation measures do not conflict, but support one another, to achieve the overall goals and vision of a general plan. In preparing the 2003 Housing Element, the City reviewed goals and policies of the various elements of the Lodi General Plan. The City has concluded that the 2003 Housing Element is consistent with the vision of the General Plan. Policies included in other General Plan elements that affect housing are summarized below (and as summarized in the Housing Element Section I-G).

General Plan Land Use Element

1. The City shall establish a growth management ordinance that ensures a population-based housing growth rate of 2.0 percent (compounded) per year consistent with the recommendations of the Mayor's Task Force on Measure A.
2. The City shall require specific development plans in areas of major new development.
   Housing Element:
3. The City shall encourage the preservation of agricultural land surrounding the City.
4. The City shall support the continuation of agricultural uses on lands designated for urban uses until urban development is imminent.
5. The City shall promote land use decisions within the designated urbanized area that allow and encourage the continuation of viable agricultural activity around the City.
6. The City shall maintain an adequate supply of residential land in appropriate land use designations and zoning categories to accommodate a population-based 2.0 percent per year housing growth rate.

7. The City shall promote the development of affordable housing to meet the needs of low- and moderate-income households.
10. The City shall encourage higher density housing to be located in areas served by the full range of urban services, preferably along collector, arterial, and major arterial streets, and within walking distance of shopping areas.

General Plan Parks, Recreation, and Open Space Element

12. The City shall assess a park development fee on all new residential, commercial, office, and industrial development sufficient to fund the acquisition and development of new parkland consistent with the City standards identified in the policy above.
13. The City shall expand the neighborhood and community park system with the goal of providing park facilities within walking distance of all new residential areas.
14. The City shall require that more open space be provided within multifamily developments through wider setbacks and greater building separation.
15. The City shall promote the provision of private open space and recreational facilities as part of new large-scale residential developments to meet a portion of the recreation and open space needs that would be generated by the development.

General Plan Health and Safety Element

16. The City shall assess development fees on all new residential, commercial, office, and industrial development sufficient to fund capital improvements and equipment required to provide fire protection.
17. The City shall assess development fees on all new residential, commercial, office, and industrial development sufficient to fund capital improvements and equipment required to provide police protection.

General Plan Urban Design and Cultural Resources Element

18. The City shall respect existing neighborhood scale and character when infilling and/or upgrading existing residential areas.
19. The City shall promote the creation of well-defined residential neighborhoods in newly developing areas. Each of these neighborhoods should have a clear focal point, such as a park, school, or other open space and community facilities, and should be designed to promote pedestrian convenience.
20. The City shall provide home improvement incentives for upgrading landscaping and parking areas in the Eastside neighborhood.

The Housing Element includes policies and programs that ensure consistency with the General Plan and help to mitigate any adverse impacts related to land use policies, agricultural resources, aesthetics, and agricultural zoning:

The Housing Element is found to be consistent with the other elements of the General Plan, as well as documents and plans adopted in accordance with the General Plan.

The General Plan EIR identified inconsistencies with agricultural land use designations of the San Joaquin County General Plan south of the city. Mitigation included in the General Plan EIR requires the City to establish an ongoing process to coordinate planning with the County. In addition, any future annexation of County lands for urban development would require coordination with the San Joaquin LAFCo to address planning consistency issues and impacts on agricultural resources.

Agriculture has multiplier effects throughout various sectors of the economy. Agricultural purchases stimulate private sector sales; personal income derived through farming leads to purchases of goods and services in other sectors; and agricultural operations create jobs in agricultural processing and other sectors of the economy. The loss of agricultural land affects industries supportive of, or dependent upon agriculture, such as agricultural machinery manufacturers, chemical manufacturers, processors, and people working in retail food trade have jobs related to agriculture.

The Housing Element proposes transfer of development rights, agricultural buffers, and efficient use of land that would avoid unnecessary conversion of farmland (Programs 4, 6, and 9 of the Housing Element). The growth management ordinance and infrastructure/services concurrency requirements also limit unnecessary urban land conversion (Program 2 of the Housing Element). Nonetheless, annexation of areas of Prime Farmland and conversion to urban use represents a potentially significant impact. Apart from the policies in the Housing Element that reduce impacts in this regard, there are no feasible mitigation measures available. This impact is **significant and unavoidable**.

Impact LU-2 Adverse Effect on Scenic Resources

Annexation of farmland west and south of Lodi would have an aesthetic impact. Increased density and infill may alter Lodi's small town, rural character. Increased density, infill, and housing development on the outskirts of the city may involve the removal of trees and other vegetation.

Enforcement of property maintenance, rehabilitation programs, and neighborhood preservation and revitalization may improve the overall aesthetic presentation of certain parts of the city. Housing Element policies meant to promote residential density and infill would also prevent the unnecessary conversion of agricultural and other open space outside of the developed city. Transfer of development rights, agricultural buffers, and more efficient use of land would avoid unnecessary conversion of farmland. The Housing Element requires affordable housing included in the context of an overall development to be visually indistinguishable from the other housing, which may provide some aesthetic benefit.

The Housing Element does not propose development of particular projects on particular pieces of property, and does not recommend development of areas along the Mokelumne River. However, policies and programs in the Housing Element could encourage or accommodate conversion of scenic farmland west of the city to meet the regional housing needs allocation. Depending on the level and intensity of development, this could represent a significant impact. Even though more compact development patterns are promoted as a method of conserving agricultural lands compared to what would be developed under recent lower-density development patterns, impacts of development of agricultural lands outside the city limits represents a potentially **significant and unavoidable** impact.

Impact LU-3 Creation of Light Spillage and Glare

Infill residential development and residential development on vacant or underutilized land may introduce sources of light and glare into areas of the city that previously were mostly dark at night. Annexation of areas south and west of Lodi, and urban development there would introduce light

and glare. Personal security standards for development may increase the level of light and glare associated with new development, if not properly mitigated. Increased development density may increase the density of security and other lighting, producing more light pollution than would occur with lower density development.

The General Plan identifies important urban design considerations for future development and redevelopment of the city. Urban design guidelines are to be developed for certain important areas of the city such as downtown and the Eastside neighborhood, while many General Plan policies and guidelines to be developed apply on a citywide basis (refer to pages 10-3 through 10-11 of the City of Lodi General Plan Policy Document). Future housing projects will be developed using City guidelines and will require CEQA review. Lighting standards, cut-off standards, and glare reduction will be required through future City design review and CEQA review. The Housing Element does not encourage or facilitate development of outdoor stadiums, car lots, or other land uses associated with high levels of light or glare. The impact is considered **less than significant**.

Notes and References

[1] City of Lodi. *Draft General Plan Background Report.* 1990.
[2] San Joaquin County Agricultural Commissioner. Annual Report of Agricultural Production in San Joaquin County. 2002.
[3] Survey compiled by the California Department of Water Resources, 1982. Cited in the *Lodi General Plan Background Report,* Figure 2-8.
[4] *California Department of Conservation.* www.consrv.ca.gov/.
[5] California Department of Conservation. Farmland Mapping and Monitoring Program. Statistics and Reports. County, Regional & Statewide Farmland Conversion Tables. www.consrv.ca.gov.
[6] *California Department of Conservation.* California Department of Conservation Farmland Mapping and Monitoring Program. *2000 FIELD REPORT, COUNTY: San Joaquin.* 2001.
[7] City of Lodi. *General Plan Background Report.* Page 2-24.
[8] City of Lodi. *Draft General Plan Environmental Impact Report,* 1990; City of Lodi, General Plan Policy Document, 1991.
[9] Ibid.
[10] San Joaquin County Local Agency Formation Commission. *Guidelines for Formation and Development of Local Governmental Agencies.* No date.

3.8 Noise

This section describes noise impacts resulting from construction and operation of projects encouraged or accommodated by implementation of the Housing Element Update. Noise impacts are considered both in the short term and in the long term. Short-term effects are those resulting from construction or other activities with a short duration. Long-term effects are the result of increased traffic in the area attributable to Housing Element implementation and exposure of sensitive land uses to existing or future sources of noise.

Background

Noise is unwanted sound. Noise is measured on a decibel scale, which allows practical measurement and characterization. The decibel scale is adjusted for community noise impact assessment to consider the additional sensitivity to certain pitches (through the A-weighting mechanism) and to consider the additional sensitivity during evening and nighttime hours (through the Community Noise Equivalent Level and Day-Night Average).

Day-Night Average Sound Level

Average sound exposure over a 24-hour period is often presented as a day-night average sound level (L_{dn}). L_{dn} values are calculated using hourly L_{eq} values, with the L_{eq} values for the nighttime period (10:00 P.M.-7:00 A.M.) increased by 10 dB to reflect the greater disturbance potential from nighttime noises.

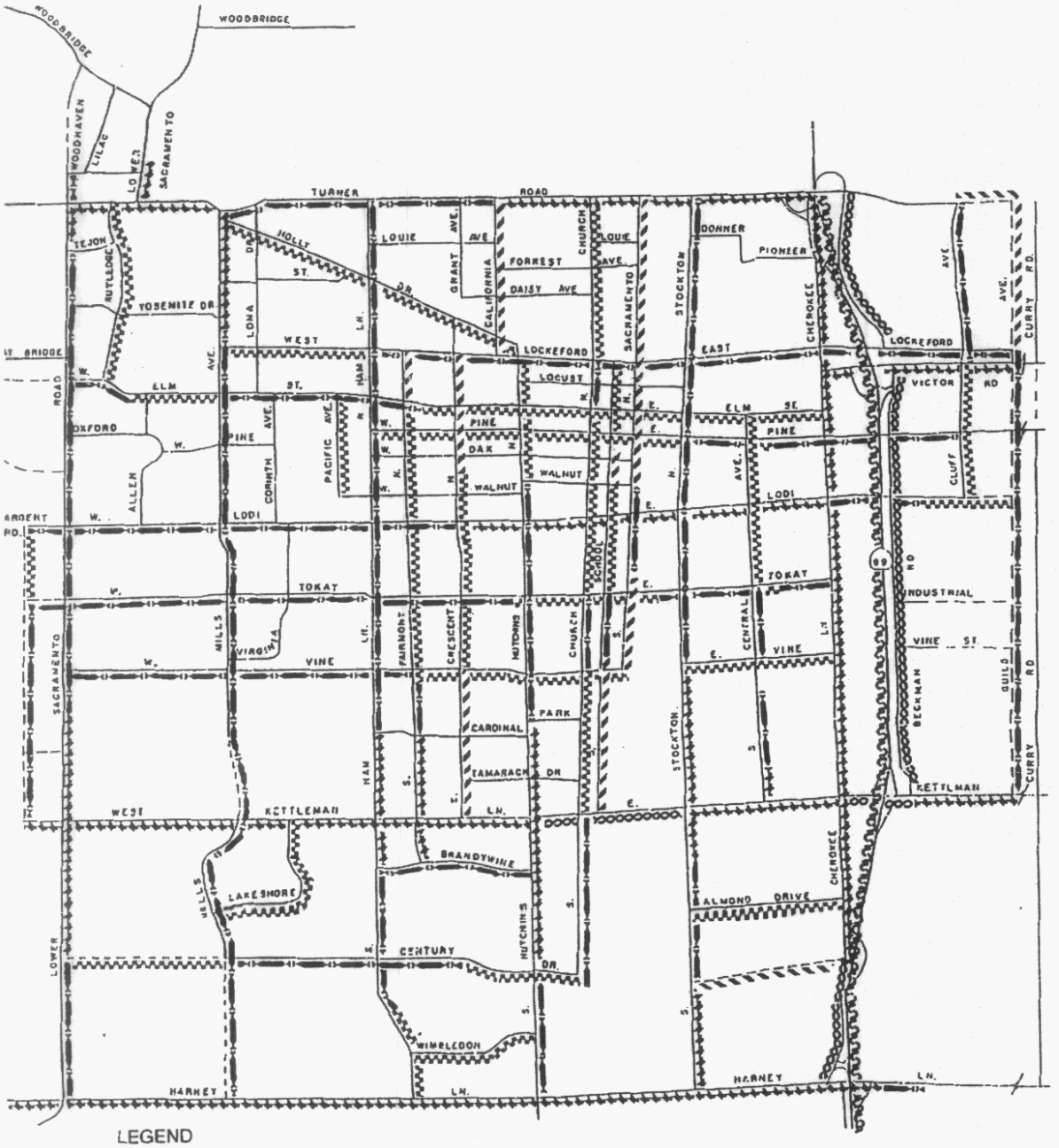
Community Noise Equivalent Level

The community noise equivalent applies weighting factors for both evening and nighttime sound levels. L_{eq} values for the evening period (7:00 P.M.-10:00 P.M.) are increased by 5 dB, while L_{eq} values for the nighttime period (10:00 P.M.-7:00 A.M.) are increased by 10dB.

Environmental Setting

Lodi experiences typical urban noise from sources such as automobile traffic, operation of mechanical equipment and construction equipment, vocalizations, loud stereos, and related sources. Primary sources of noise include highways and other roadways (especially Highway 99) and railroad noise (see Figure 3.8-1). Construction noise is an intermittent and temporary contributing source, and industrial noise is generated in the central and eastern portions of the city. Existing noise levels in the central portion of Lodi are in the range of 53 – 65 L_{eq}.[1] Most recent traffic counts available for the City are from April of 2003. Traffic noise can be estimated using assumptions about traffic mix, timing, intervening surfaces, and related variables. The estimated distance to the 60 and 65 dB(A) CNEL noise contours from city roads is shown in Table 3.8-1.

Figure 3.8-1
Roadway Noise Levels (1990)



No Scale.
Source: City of Lodi General Plan Policy Document, 1991; Adapted by Cotton/Bridges/Associates, 2003.

Table 3.8-1
April 2003 Estimated Distance to 60 and 65 CNEL Noise Contour

Roadway	between	and	Estimated Distance to 60 dB(A) CNEL Contour	Estimated Distance to 65 dB(A) CNEL Contour (in feet from centerline)
Turner	Evergreen Dr	Woodhaven Ln	130	66
Turner	Woodhaven Ln	Lower Sacramento Rd	184	90
Turner	Lower Sacramento Rd	Mills Ave	215	104
Turner	Mills Ave	Ham Ln	199	96
Turner	California St	Church St	191	93
Turner	Stockton St	Cherokee Ln	185	90
Turner	Cherokee Ln	Cluff Ave	84	47
Turner	Cluff Ave	Guild Ave	55	35
Lockeford	Mills Ave	Ham Ln	74	42
Lockeford	Ham Ln	Hutchins St	132	67
Lockeford	Hutchins St	Church St	153	76
Lockeford	Church St	Stockton St	168	83
Lockeford	Stockton St W	Cherokee Ln W	150	75
Lockeford	Stockton St N	Cherokee Ln N	133	67
Lockeford	Beckman Rd	Cluff Ave	154	77
Elm	Evergreen Dr	Lower Sacramento Rd	67	40
Elm	Lower Sacramento Rd	Mills Ave	87	48
Elm	Mills Ave W	Ham Ln W	113	59
Elm	Ham Ln E	Ham Ln E	131	66
Elm	Ham Ln W	Hutchins St W	97	52
Elm	Hutchins St	Church St	67	40
Elm	Church St	Stockton St	62	37
Elm	Stockton St	Cherokee Ln	67	40
Lodi	West of Lower Sacramento Rd		119	61
Lodi	Lower Sacramento Rd	Mills Ave	119	61
Lodi	Mills Ave	Ham Ln	142	71
Lodi	Ham Ln	Hutchins St	187	91
Lodi	Hutchins St	Church St	205	99
Lodi	Church St	Stockton St	183	89
Lodi	Central Ave	Cherokee Ln	174	85
Lodi	Cherokee Ln	Highway 99	94	51
Lodi	Beckman Rd	Cluff Ave	88	48
Lodi	Cluff Ave	Guild Ave	59	36
Tokay	Lower Sacramento Rd W	Mills Ave W	51	33
Tokay	Lower Sacramento Rd E	Mills Ave E	73	42
Tokay	Mills Ave	Ham Ln	118	61
Tokay	Ham Ln	Hutchins St	108	57
Tokay	Hutchins St	Church St	106	56
Tokay	Church St	Stockton St	122	63
Tokay	Stockton St	Central Ave	92	50
Tokay	Central Ave	Cherokee Ln	76	43

Table 3.8-1
April 2003 Estimated Distance to 60 and 65 CNEL Noise Contour

Roadway	between	and	Estimated Distance to 60 dB(A) CNEL Contour	Estimated Distance to 65 dB(A) CNEL Contour (in feet from centerline)
Vine	Lower Sacramento Rd W	Mills Ave W	79	45
Vine	Lower Sacramento Rd E	Mills Ave E	84	47
Vine	Mills Ave	Ham Ln	88	48
Vine	Ham Ln W	Hutchins St W	91	49
Vine	Ham Ln E	Hutchins St E	71	41
Vine	Hutchins St	Church St	50	33
Vine	Stockton St	Central Ave	48	32
Vine	Central Ave	Cherokee Ln	56	35
Kettleman	West of Lower Sacramento Rd		173	85
Kettleman	Lower Sacramento Rd	Mills Ave	323	152
Kettleman	Ham Ln	Hutchins St	331	156
Kettleman	Hutchins St	Church St	353	166
Kettleman	Stockton St	Almond Dr	300	142
Kettleman	Highway 99	Beckman Rd	214	103
Kettleman	East of Beckman Rd		144	72
Century	West of Mills Ave		50	33
Century	Mills Ave W	Ham Ln W	79	45
Century	Mills Ave E	Ham Ln E	113	59
Century	Ham Ln W	Hutchins St W	107	56
Century	Ham Ln E	Hutchins St E	119	61
Century	Hutchins St	Stockton St	94	51
Harney	Mills Ave	Ham Ln	122	63
Harney	Ham Ln	Hutchins St	143	72
Harney	Hutchins St	Stockton St	188	91
Harney	Stockton St	Central Ave	157	78
Lower Sacramento	North of Harney Ln		191	93
Lower Sacramento	South of Kettleman Ln		199	96
Lower Sacramento	Kettleman Ln	Vine St	255	121
Lower Sacramento	Tokay St	Lodi Ave	256	122
Lower Sacramento	Lodi Ave	Elm St	231	111
Lower Sacramento	Elm St	Turner Rd	66	39
Lower Sacramento	Turner Rd	Woodhaven Ln	162	80
Mills	Harney Ln S	Century Bl S	74	43
Mills	Harney Ln N	Century Bl N	73	42
Mills	Century Bl S	Kettleman Ln S	86	47
Mills	Century Bl N	Kettleman Ln N	88	48
Mills	Kettleman Ln S	Vine St S	98	52
Mills	Kettleman Ln N	Vine St N	122	63
Mills	Vine St	Tokay St	133	67
Mills	Tokay St	Lodi Ave	137	69
Mills	Lodi Ave S	Elm St S	133	67
Mills	Lodi Ave N	Elm St N	132	67

Table 3.8-1
April 2003 Estimated Distance to 60 and 65 CNEL Noise Contour

Roadway	between	and	Estimated Distance to 60 dB(A) CNEL Contour	Estimated Distance to 65 dB(A) CNEL Contour (in feet from centerline)
Mills	Elm St	Lockeford St	126	64
Mills	Lockeford St	Turner Rd	114	59
Ham	Harney Ln S	Century Bl S	125	64
Ham	Harney Ln N	Century Bl N	148	74
Ham	Century Bl S	Kettleman Ln S	146	73
Ham	Century Bl N	Kettleman Ln N	170	84
Ham	Tokay St	Lodi Ave	196	95
Ham	Lodi Ave	Pine St	196	95
Ham	Lockeford St S	Turner Rd S	155	77
Ham	Lockeford St N	Turner Rd N	154	77
Hutchins	Harney Ln	Century Bl	194	94
Hutchins	Century Bl	Kettleman Ln	194	94
Hutchins	Tokay St	Lodi Ave	147	73
Hutchins	Lodi Ave	Pine St	143	72
Hutchins	Elm St	Lockeford St	146	73
Church	Century Bl	Kettleman Ln	116	60
Church	Kettleman Ln	Vine St	121	62
Church	Tokay St	Lodi Ave	121	62
Church	Lodi Ave	Pine St	141	71
Church	Elm St	Lockeford St	126	64
Church	Lockeford St	Turner Rd	91	49
Stockton	Harney Ln	Century Bl	116	60
Stockton	Almond Dr	Kettleman Ln	44	30
Stockton	Kettleman Ln	Vine St	124	63
Stockton	Tokay St	Lodi Ave	123	63
Stockton	Lodi Ave	Pine St	105	55
Stockton	Elm St	Lockeford St	104	55
Stockton	Lockeford St S	Turner Rd S	77	44
Stockton	Lockeford St N	Turner Rd N	67	40
Central	Kettleman Ln	Vine St	92	50
Central	Vine St	Tokay St	95	51
Central	Tokay St	Lodi Ave	106	56
Cherokee	Almond Dr	Kettleman Ln	172	84
Cherokee	Kettleman Ln	Vine St	215	104
Cherokee	Vine St	Tokay St	218	105
Cherokee	Tokay St	Lodi Ave	206	100
Cherokee 5	Lodi Ave	Pine St	223	107
Cherokee 6	Pine St	Lockeford St	237	113
Highway 99	South of Harney Ln		1013	471
Highway 99	Harney Ln	Kettleman Ln	1037	482
Highway 99	Kettleman Ln	Victor Rd	1012	471
Highway 99	North of Turner Rd		1037	482

Table 3.8-1
April 2003 Estimated Distance to 60 and 65 CNEL Noise Contour

Roadway	between	and	Estimated Distance to 60 dB(A) CNEL Contour	Estimated Distance to 65 dB(A) CNEL Contour (in feet from centerline)
Beckman	Kettleman Ln	Vine St	132	67
Beckman	Vine St	Tokay St	110	58
Beckman	Tokay St	Lodi Ave	110	58
Beckman	Pine St	Lockeford St	89	49

Note: The "roadway" column identifies the road and the "between" and "and" columns identify the specific roadway segment. If the "between" and "and" columns identify roads and a direction (i.e., N, S, E, or W), this indicates that there are data for two points along the roadway segment. Directions are included to distinguish the two data points from one another.

Source: Traffic counts from the City of Lodi web site; noise analysis based on FHWA noise modeling methods.

Regulatory Background

Noise is regulated by government agencies at the federal and State levels, though authority and responsibility for regulating, monitoring, and enforcing noise regulations typically occurs at the local level. Existing regulations provide a basis for examining the impacts of projects under CEQA, and the enforcement of local noise regulations can reduce noise-related impacts of projects.

Federal Standards

The federal Noise Control Act of 1972 requires that all federal agencies promote an environment free of noise that would jeopardize public health or welfare. The U.S. Environmental Protection Agency (EPA) was given the responsibility for establishing noise standards. Outdoor L_{dn} limits of 55 dB and indoor L_{dn} limits of 45 dB are identified as desirable to protect against speech interference and sleep disturbance for residential, educational, and healthcare areas.

The Federal Highway Administration (FHWA) adopted criteria for evaluating noise impacts of federally funded highway projects. The criteria are based on peak hourly L_{eq} sound levels, not L_{dn} or 24-hour L_{eq} values. The maximum allowable peak 1-hour L_{eq} for residential, educational, and healthcare facilities is 67 dB outdoors and 52 dB indoors.

The U.S. Department of Housing and Urban Development (HUD) established guidelines for evaluation of noise impacts on federally funded residential projects. Prior to development of federally funded residential projects, the surrounding noise environment is assessed and characterized according to the following standards:

- Acceptable if exposed to outdoor L_{dn} values of 65 dB or less;
- Normally unacceptable if exposed to outdoor L_{dn} values of 65-75 dB; and,
- Unacceptable if exposed to outdoor L_{dn} values above 75 dB.

The Federal Interagency Committee on Urban Noise, which is composed of representatives from the Department of Defense, Department of Transportation, Department of Housing and Urban Development, the EPA, and the Veterans Administration, published guidelines for considering noise in land use planning, summarized in Table 3.8-2 for residential uses. Residential development is appropriate under these guidelines in areas with a noise environment up to 65 L_{dn}.

Table 3.8-2
Federal Land Use Compatibility Standards

Land Use	Yearly L_{dn}	
	Below 65	Above 65
Residential	Y	N

Y = Yes, land use and related structure compatible without restrictions;
N = No, land use and related structure not compatible and should be prohibited.
Source: Federal Interagency Committee on Urban Noise (FICUN). *Guidelines for Considering Noise in Land-Use Planning and Control.* June 1980.

California State Land Use Compatibility Standards

The California Department of Health Services Office of Noise Control studied the relationship between noise and various land uses, and provided land use compatibility guidelines for the noise elements of local general plans. The guidelines are the basis for most noise element land use compatibility guidelines in California, including those adopted by the City. The Land Use Compatibility Standards generated by the State and adopted by Lodi are presented in Table 3.8-3 below.

Lodi Noise Standards

Lodi's General Plan includes Noise Compatibility Guidelines, (see Table 3.8-2) which identify acceptable noise levels for different types of land use development. All residential development is addressed through the same noise compatibility standard regardless of density or location. A noise environment of up to 65 dB (L_{dn} or CNEL) is presumed to be acceptable without any special requirements for mitigation. The Noise Element also contains policies that:

- Apply the State noise insulation standards to all residential dwellings, hospitals, convalescent homes, and rest homes;
- Prohibit new residential development in areas exposed to L_{dn} levels above 75 dB unless effective noise shielding of indoor and outdoor areas can be achieved; and
- Reduce exterior L_{dn} levels, where possible, to less than 65 dB for new noise-sensitive land uses.

Table 3.8-3
Maximum Outdoor Ambient Noise Levels by Land Use

Land Use Category	Outdoor Noise Exposure, in L_{dn} or CNEL, dB						
	≤55 dB	55-60	60-65	65-70	70-75	75-80	> 80
Residential, including apartments & mobile homes							
Transient lodging (motels, hotels) & convalescent facilities							
Churches, hospitals, schools, & meeting halls							
Theaters, concert halls, & auditoriums							
Sports arenas, amusement parks, & outdoor spectator sports							
Parks, playgrounds, golf courses, riding stables, outdoor ampitheateers, & passive open space							
Business office, medical & dental offices, retail & wholesale facilities							
Manufacturing & other industrial facilities							

Key

Presumed to be acceptable

Normally unacceptable

Conditionally acceptable

Presumed to be unacceptable

According to the Lodi General Plan EIR,

> The most noticeable increases in traffic noise would occur along roadways serving future development sites and roadways providing freeway access. Such roadways include portions of Kettleman Lane (estimated increase of 2.5-3 dB), Harney Lane (2.5 dB), Lower Sacramento Road (2.5-3 dB), Turner Road (2.5-4 dB), Pine Street (2-2.5 dB), and Mills Avenue (2.5 dB). A noise-level increase of 2.5 dB represents a 19-percent increase in apparent loudness, 3 dB a 23-percent increase, and 4 dB a 32-percent increase.

The Noise Element contains the following policies and implementation programs to minimize noise impacts associated with future development:[1]

Policy A-1: The City shall use the outdoor CNEL criteria on the attached land use compatibility chart as a primary guide to determine whether all or part of an existing or proposed development site should be considered "noise impacted"; areas shall be considered noise impacted if current or projected exterior noise levels would classify the area as "conditionally acceptable," "normally unacceptable," or "presumed to be unacceptable" for the existing or proposed use.

Policy A-2: The City shall recognize that a CNEL measure does not adequately reflect the disturbance effects of intermittent noise events or noise sources that operate for only part of a day. Intermittent or discontinuous noise sources should be evaluated on a case-by-case basis to determine appropriate land use compatibility classifications.

Policy A-3: The City shall require a noise impact analysis for development projects on sites that are wholly or partially noise impacted under existing or projected future conditions.

Policy A-4: The City shall require a noise impact analysis for development projects that may cause or significantly contribute to adjacent properties becoming noise impacted.

Policy A-5: Noise impact analyses required by Policies A-3 and A-4 above shall:

- Be included in any environmental impact study prepared for the proposed project;
- Be the responsibility of the project applicant;
- Be prepared by persons with adequate experience and training to properly address the noise impact and noise mitigation issues that may arise;
- Include at the discretion of City staff, ambient noise monitoring of the project site and adjacent areas for sufficient time periods and at appropriate seasons to clarify the land use compatibility status of the property under current conditions;
- Estimate future noise levels and land use compatibility conditions following buildout of the proposed project;
- Include an evaluation of the magnitude, duration, and temporal pattern of noise impacts associated with intermittent noise sources that will be associated with the proposed project or that will affect the project site;
- Include identification of noise mitigation measures required to produce "presumed to be acceptable" conditions on the potentially noise impacted property;
- Include an evaluation of the effectiveness of berms, sound walls, or wall-berm combinations for areas significantly affected by noise from railroad operations or traffic on state highways;
- Include recommendations regarding feasible noise mitigation measures and an evaluation of their expected effectiveness if it is judged infeasible to reduce noise levels at the noise impacted property to a "presumed to be acceptable" level;
- Include a discussion of mitigation monitoring procedures that can be used to ensure that recommended mitigation measures are implemented.

Policy A-6: The City shall require a comprehensive, objective analysis of alternative land uses for the proposed site and alternative sites for the proposed uses for:

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[1] City of Lodi. *General Plan*. 1991.

- Any development projects that contain areas that would be classified as "normally unacceptable" or "presumed to be unacceptable" after implementation of recommended noise mitigation measures, or
- Any development projects that would cause adjacent properties to be classified as "normally unacceptable" or "presumed to be unacceptable" even with implementation of recommended noise mitigation measures.

Policy A-7: The City shall recognize residential uses (including apartments and mobile homes), motels, hotels, other transient lodgings, hospitals, convalescent facilities, and schools as noise-sensitive land uses.

Policy A-8: The City should deny development projects that would be classified as "normally unacceptable" or "presumed to be unacceptable" unless one of the following findings can be made:

Finding A:

- The uses proposed for the noise impacted area are not noise-sensitive and are fully contained within enclosed structures that meet or exceed the indoor noise criteria listed in (Figure 6-4) [Figure 16-3 of this EIR]; and
- The proposed uses will not expose employees, occupants, or visitors to outdoor noise conditions for longer than required to enter or leave the property; and
- The proposed uses will not create or significantly contribute to noise problems on other properties.

Finding B:

- The uses proposed for the noise impacted area are not noise-sensitive; and
- Noise exposures inherent in the proposed uses will significantly exceed the pre-project ambient noise level; and
- The proposed uses will not create or significantly contribute to noise problems on other properties.

Finding C:

- There are no other reasonable uses for the property; and
- The proposed uses will not create or significantly contribute to noise problems on other properties.

Policy A-9: The City shall apply the State Noise Insulation Standards (California Administrative Code, Title 24) and Chapter 35 of the Uniform Building Code to all new convalescent facilities, hospitals, and single family residential developments in addition to the multifamily and transient lodging developments covered by the State Noise Insulation Standards.

Policy A-10: The City shall actively pursue opportunities provided by highway and utility construction projects to install or obtain sound walls or other noise reduction measures for existing noise sensitive land uses located in noise impacted areas.

Policy A-11: The City shall establish a noise ordinance to regulate intermittent, temporary, or permanent stationary noise sources associated with land uses in the City of Lodi.

Methodology

Existing literature, application of accepted noise prediction techniques, and known characteristics of sound were used to predict changes in ambient noise levels resulting from the Project. Specific noise sources evaluated in this section include traffic and construction noise.

Traffic Noise Impact Assessment Methodology

To describe noise levels associated with project traffic, an application based on the Federal Highway Administration Highway Traffic Noise Prediction Model (FHWA RD-77-108) is used. The FHWA model is the analytical method used by most State and local agencies for predicting traffic noise impacts. The FHWA model yields estimates of hourly L_{eq} values for free-flowing traffic conditions. To predict L_{dn} and CNEL values, noise levels were averaged over 24 hours, a reasonable day/night distribution of traffic was assumed, and evening and nighttime penalties were applied.

Construction Noise Impact Assessment Methodology

Implementation of the Housing Element may encourage or accommodate construction, especially housing construction that may occur during the Housing Element planning period (2001 - 2008). During construction, noise from construction activities would add to the noise environment in the immediate vicinity. A typical array of construction equipment would be expected to generate maximum noise levels ranging from 85 to 90 dB at a distance of 50 feet (Table 3.8-4). Construction activities would be temporary in nature and are anticipated to occur during normal daytime working hours. Reasonable assumptions of construction activities are used to predict and describe the temporary impact of construction activities.

Table 3.8-4
Construction Equipment Noise

Type of Equipment	Typical Noise Level, dB(A) 50 Feet From Source
Backhoe	80
Grader	85
Loader	85
Roller	75
Bulldozer	85
Truck	88
Scraper	89

Source: Federal Transit Administration 1995.

The entire Housing Element Update is incorporated by reference in this EIR. Implementation of the majority of the programs included within the Housing Element Update will not result in any adverse physical environmental impact. For the purposes of this section of the EIR, only those policies, goals, and programs that may result in noise effects have been analyzed. Mitigation measures included in the General Plan EIR that would reduce impacts to the city's noise environment are not

altered by the Housing Element or the Housing Element EIR and are considered as a part of the impact analysis in this section. The following excerpt includes all relevant Housing Element policies and programs:

Goal A: **To provide a range of housing types and densities for all economic segments of the community while emphasizing high quality development, homeownership opportunities, and the efficient use of land.**

Policies:

3. The City shall continue to exempt senior citizen housing projects from the growth management ordinance.

4. The City shall exempt very low- and/or low-income housing units from the growth management ordinance.

10. The City shall seek to intersperse very low- and low-income housing units within new residential developments and shall ensure that such housing is visually indistinguishable from market-rate units.

13. The City shall encourage infill residential development and higher residential densities within the existing City limits near transit stops, and compact development patterns in annexation areas to reduce public facility and service costs, avoid the premature conversion of natural resource and agricultural lands, and reduce the number of trips from private vehicles.

Program 1: Zoning Ordinance Revisions

The City shall revise Title 17 of the Lodi Municipal Code (Zoning Ordinance) to reduce barriers to, and provide incentives for, the construction and conservation of a variety of housing types. Revisions to Title 17 will include the following:

a. The addition of a chapter that provides for density bonuses and other incentives for projects that include ten percent very low-income housing, 20 percent low-income housing, 50 percent qualifying senior housing, or 20 percent moderate-income hosing in condominium conversion projects, in compliance with Sections 65915 - 65918 of the California Government Code. The City shall work with the San Joaquin County Housing Authority in developing procedures and guidelines for establishing income eligibility for the "reserved" units and for maintaining the "reserved" units as affordable units for at least 30 years. The City shall seek Housing Authority administration of the reserved units. The City shall establish a program to publicize the availability of the density bonus program through the City's website, program information at the Community Development Department public counter, and pre-development meetings with housing providers (such as the housing unit allocation stage). The City shall encourage prospective housing developers to use the density bonus program at pre-development meetings. In conjunction with density bonuses, the City will offer one or more regulatory incentives, as needed and appropriate, such as:

    - Reduced parking for projects oriented to special needs groups and/or located close to public transportation and commercial services;

    - Expedited permit processing; or

- Deferral of fees for an appropriate time period to allow for the project to begin generating income.

b. Conformance with California Government Code sections 65852.3 and 65852.7, which require that manufactured homes in single-family zones on permanent foundations be permitted under the same standards as site-built homes (with limited exceptions) and that mobilehome parks be permitted in any residential zone (although the City may require a use permit).

c. Addition of standards for emergency shelters and transitional housing to clearly identify appropriate zoning districts and locations for such facilities and to make these sites readily accessible. Until the adoption of such revisions to the Zoning Ordinance, the City will continue to allow by right the development of such facilities in areas zoned C-M or C-2.

d. Addition of a definition of farmworker housing that does not conflict with state law definitions for employees housing (beginning with California Government Section 17000) and specification of the zoning districts and standards under which such housing will be permitted.

e. Clarification of standards for permitting residential care facilities (such as group homes). The City will specify that all such facilities with six or fewer residents are permitted in residential zoning districts. The City will also designated zoning districts in which facilities of seven or more persons will be permitted through a use permit and standards for such facilities.

f. Revision of off-street parking requirements (Chapter 17.60) to allow for less than two spaces per multifamily dwelling unit with fewer than two bedrooms when justified due to the characteristics of the occupants (such as seniors, persons with disabilities, or low-income single working adults) and/or the project location (such as along a public transit route or in the downtown area).

g. Revision of standards for second dwelling units to allow the conversion of accessory buildings to second units subject to compliance with all other zoning and parking standards, an appropriate minimum lot size for detached second units, and architectural compatibility with the main dwelling unit. The City will permit second dwelling units through an administrative permit process in compliance with state law (California Government Code section 65852.2).

h. Elimination of single-family homes as permitted uses in the R-GA, R-MD, R-HD, and R-C-P zones, except on parcels constrained by lot size, environmental, or other factors that would make the construction of multifamily housing infeasible.

i. Reduction in the number of non-residential uses permitted in multifamily residential zones to public and quasi-public uses and supportive services for multifamily residents.

Responsibility: Community Development Department, Planning Commission, City Council
Timeframe: Complete zoning code amendments as part of a new unified development code by June 2004.
Funding: General Fund
Objective: Reduce regulatory barriers to the provision of housing

Program 2: Revise Growth Management Program

The City will revise its growth management program to exempt housing units affordable to very low- or low-income households with long-term affordability restrictions.

Responsibility: Community Development Department
Timeframe: Begin second round of allocations, if needed, in 2005 and annually thereafter
Funding: Application fees
Objective: Expedite the residential development approval process

Program 4: Land Inventory

The City shall prepare and maintain a current inventory of vacant, residentially zoned parcels and a list of approved residential projects, and shall make this information available to the public and developers, including information on underutilized sites within the downtown area with residential or mixed-use development potential. The City shall update the inventory and list at least annually. The City will promote the land inventory and the availability of each update through the City's web site, a notice at the Community Development Permit Counter, and a press release subsequent to each update.

To encourage the maximum efficient use of land within the current City limits, Lodi will also conduct a study of residential development potential on underutilized industrial and commercial sites along Cherokee Lane, South Sacramento Street, South Stockton Street, and West Kettleman Lane. Properties along these corridors may be suitable for future residential development if sufficient land can be consolidated to make such development feasible (see Figures 2-3 through 2-5, which follow). These areas are characterized by obsolete patterns of land development, older structures in substandard condition, odd-sized lots, and marginally viable commercial and industrial uses that would make properties ripe for redevelopment in the next five to ten years. If Lodi determines that residential development is feasible along these streets, the City will initiate a planning process with property owners (which may be a special area plan or a specific plan meeting state law requirements) to define specific properties suitable for residential or mixed-use development, appropriate development standards, and improvements needed to support residential development.

Responsibility: Community Development Department, Planning Commission, City Council
Timeframe: Complete study of residential development potential by December 2006; prepare and adopt area plan(s) by December 2009.
Funding: General Fund, contributions from property owners
Objective: Increase the potential for infill development, thereby reducing the need to prematurely annex land and convert agricultural land to urban use

Program 9: Annexation of Land to Accommodate Future Housing Needs

The City will work with property owners of approximately 600 acres outside the current City limits, but within Lodi's Sphere of Influence (SOI), to plan for, and annex the land to the City so that additional residential development opportunities can be provided to meet Lodi's future housing construction needs. The 600 acres is located between Harney Lane, Lower Sacramento Road, the Woodbridge Irrigation District canal, and the western SOI boundary. The City has facilitated a specific planning process with property owners of approximately 300 acres to prepare these sites for annexation to the City. The development potential for the properties to be annexed is summarized in Table II-1B.

The City does not need to annex all 600 acres within the next three to six years to meet housing construction needs given the backlog of unused housing allocations and available sites within the current City limits, but will initiate the process with property owners during the 2003 - 2009 period.

Responsibility: Community Development Department, Planning Commission, City Council
Timeframe: Annex initial 300 acres by December 2005; annex remaining land by December 2009.
Funding: Annexation and permit fees
Objective: Increase the City's residential development capacity to accommodate its share of the region's future housing construction needs between 2001 and 2009, and subsequent years, under the San Joaquin County Council of Governments housing allocation plan

Program 13: Housing Rehabilitation and Code Enforcement

The City will continue to combine code enforcement and housing rehabilitation assistance, targeted to the Eastside area. The City will promote its program through the Eastside Improvement Committee, a neighborhood organization that provides direct outreach to area residents and property owners, by providing information at the Community Development Department's public counter, and through a link to the program on the City's website. The City's Community Improvement Manager will work with the Committee to continue marketing the program to Eastside area residents and property owners.

Responsibility: Community Development Department
Timeframe: Current and ongoing, 2003 - 2009
Funding: CDBG and HOME, CalHOME
Objective: Improvement of 1,000 housing units (including private investment to correct code violations) over five years

Goal B: **To encourage the maintenance, improvement, and rehabilitation of the City's existing housing stock and residential neighborhoods, particularly in the Eastside area.**

Policies:

3. The City shall use available and appropriate state and federal funding programs and collaborate with nonprofit organizations to rehabilitate housing and improve older neighborhoods.

4. Housing rehabilitation efforts shall continue to be given high priority in the use of Community Development Block Grant (CDBG) funds, especially in the Eastside area.

5. The City shall support the revitalization of older neighborhoods by keeping streets and other municipal systems in good repair.

8. The City shall continue to enforce residential property maintenance standards.

Program 14: Property Maintenance and Management Standards

The City will continue to implement standards for private property maintenance (Chapter 15.30 of the Municipal Code) to 1) control or eliminate conditions that are detrimental to health, safety, and welfare; 2) preserve the quality of life and alleviate certain socioeconomic problems created by physical deterioration of property; and 3).protect property values and further certain aesthetic considerations for the general welfare of all residents of the City of Lodi.

Responsibility: Community Development Department
Timeframe: Code enforcement on both complaint and pro-active basis, 2003 – 2009
Funding: Inspection fees, code violation penalties, CDBG funds (for dwelling units occupied by low-income households)
Objective: Eliminate substandard building and property conditions

Program 18: Preservation of the Eastside Area

The City will continue to target a portion of its annual CDBG allocation for public improvements in the Eastside area in support of its housing rehabilitation and neighborhood improvement activities (see Figure 2-6). The City will also maintain the Eastside single-family residential zoning as a regulatory tool to preserve the character of the neighborhood and encourage private investment in older homes.

Responsibility: Community Development Department, Planning Commission, City Council
Timeframe: Annual CDBG allocation, maintain zoning, 2003 - 2009
Funding: CDBG, permit fees, impact fees
Objective: To preserve and improve the Eastside area.

Goal E: **To encourage residential energy efficiency and reduce residential energy use.**

Policies:

1. The City shall require the use of energy conservation features in the design and construction of all new residential structures and shall promote the use of energy conservation and weatherization features in existing homes.

2. The City shall require solar access in the design of all residential projects.

3. The City shall pursue residential land use and site planning policies, and promote planning and design techniques, that encourage reductions in residential energy consumption.

Program 29: Energy Efficiency and Weatherization Improvements for Older Homes

The City shall continue to permit energy conservation and weatherization improvements as eligible activities under the Lodi Housing Rehabilitation Program. The City will post and distribute information on currently available weatherization and energy conservation programs operated by the City, nonprofit organizations, and utility companies through the Lodi website, the Community Development Department public counter, the Lodi Public Library, the Loel Senior Center, and other public locations.

Responsibility: Community Development Department
Timeframe: Current and ongoing, 2003 – 2009

Funding: CDBG, HOME, public and private utilities, nonprofit organizations
Objective: To increase energy efficiency in older homes

Thresholds of Significance

Based on the CEQA Guidelines, the City of Lodi General Plan and Zoning Ordinance, and Title 24 of the California Building Code, the proposed project would have a significant noise impact if:

- Land uses would be exposed to noise levels exceeding the City's established guidelines for noise and land use compatibility (see Table 3.8-3). The City of Lodi General Plan identifies any use as "noise impacted" if the levels exceed the "presumed-to-be-acceptable" range,
- Noise levels would increase substantially; or,
- People would be exposed to excessive groundbourne noise or vibration levels.

Environmental Impact and Mitigation Measures

Impact N-1 Construction Noise and Vibration

Multi-family development of larger buildings and supportive infrastructure may involve excavation and foundation work that would produce noise and vibration. Infill development by definition involves construction or redevelopment in close proximity to existing developed areas, and as such, this development may expose more people to groundbourne noise and vibration compared to development of previously undeveloped areas. Heavy trucks and heavy earthmoving and construction equipment may affect existing residential development, schools, and commercial properties in the city.

Activities involved in construction typically generate maximum noise levels ranging from 85 to 90 dB at a distance of 50 feet. When combined, the sound level of the three loudest pieces of equipment (scraper, truck, and bulldozer) would be approximately 92 dB(A) measured at 50 feet.[2] If a grader [85 dB(A)] and a scraper [89 dB(A)] operate concurrently, the combined sound level would be approximately 90 dB(A) at a distance of 50 feet from a construction site.[3] The actual level of noise experienced at adjacent land uses would be reduced by distance, air absorption (1-2 dB per 1,000 feet), and wind and thermal attenuation (1 dB per 1,000 feet).

The Housing Element Update may encourage or facilitate an increase in construction activity associated with density bonus provisions, second units, annexation for housing development, land inventory work, and affordable/senior housing exemptions to the growth management ordinance. Any increase in construction would result in construction noise. The Housing Element intent to encourage infill and increased density may increase exposure to construction noise compared to a scenario similar to the past several years in Lodi where more residential development occurred in low-density, undeveloped areas. Construction noise would not only impact residential and other land uses adjacent to project sites, but also residential and other land uses located adjacent to

roadways used to transport equipment and construction workers to and from construction sites. Rehabilitation of structures, revitalization of neighborhoods, and property maintenance may also involve the use of noisy equipment, moving of equipment on- and off-site, and other noise-generating activity.

Chapter 9.24 of the Lodi Municipal Code prohibits excessive, offensive and disturbing noise. It is unlawful to use sound systems that are clearly audible at a distance of 50 feet. It is unlawful to generate any noise or sound between the hours of 10:00 P.M. and 7:00 A.M., which exceeds the ambient noise level at the property line of any residential property by more than five decibels. This applies to both commercial and noncommercial activity. Exemptions to the noise ordinance are available for:

- Any bell, siren or similar device on any vehicle, which is required by law, and which is automatically activated by placing the vehicle transmission in reverse, or by any backing movement;
- Any sound equipment operating under a city license or permit;
- Emergency repair work as defined herein; and,
- Noise necessarily generated in conjunction with health or sanitation services, including but not limited to refuse collection.

Housing construction project proponents may find it necessary to obtain a City permit to create noise in excess of City standards during site preparation and construction. Current City guidelines in the Noise Element establish a process for reviewing noise impacts of development projects, which will apply to future housing projects facilitated or encouraged by the Housing Element. Future construction projects will require CEQA review, but infill development in particular may create substantial temporary noise and/or vibration impacts. It may not be feasible to avoid such impacts in every instance. This is a **significant and unavoidable** impact.

Impact N-2 Exposure to Existing Sources of Noise

Development of property along Highway 99 and the railroad in the eastern portion of the city would expose future residents to the noise associated with these transportation facilities. Development of residential property in proximity to industrial areas and commercial areas may expose future residents to truck noise, manufacturing noise, and other urban sources of noise. The Housing Element encourages the development of senior and special needs housing in proximity to public transit and community services. Public transit routes in Lodi tend to be located along relatively busy streets, and community service centers may also be located in areas where existing levels of noise are relatively high. Annexation and urban development of land adjacent to agricultural areas would expose new residents to noise from tractors and other farm equipment.

The City's General Plan Noise Element requires noise analysis for projects that could expose sensitive receptors to existing sources of noise. The City, according to Policy A-8 of the Noise Element will "deny development projects that would [result in a land use noise compatibility environment] classified as normally unacceptable or presumed to be unacceptable unless certain findings can be made. The findings establish situations where unacceptable land use noise compatibility environments would be tolerated by the City, and these findings are fairly restrictive. Nonetheless, it is possible that a housing project encouraged or facilitated by goals, policies, and/or

programs in the Housing Element could be constructed in an area with an incompatible noise environment, creating a significant impact. Beyond Noise Element policies and the Noise Ordinance, there are no feasible additional mitigation measures. This is a **significant and unavoidable** impact.

Impact N-3 Traffic Noise Impact on Surrounding Land Uses

Implementation of the Housing Element will include land uses that attract and generate vehicular traffic. The operation of this vehicular traffic will result in noise impacts along the city's roadways, potentially affecting sensitive land uses such as medical facilities, schools, community centers, residences, and churches. Existing traffic volumes along Kettleman Lane, Turner Road, Cherokee Lane, and Highway 99 create potentially incompatible noise environments for residential development. Without berms, soundwalls, or other noise attenuating features, residential development in these areas would create a potential impact. Housing development encouraged or facilitated by the Housing Element would generate traffic that would use Lodi's roadways, creating additional noise. Since no specific project and no specific property are proposed for development by the Housing Element, it is not possible to predict the level of traffic generation or traffic-related noise. Future projects will be subject to CEQA review, which would include traffic analysis and noise analysis and mitigation, where necessary. Future projects encouraged or accommodated by the Housing Element may produce traffic noise in levels that exceed city standards for noise sensitive land uses in the developed areas of the City. Housing development in undeveloped areas can analyze traffic noise impacts and include noise attenuating features into development plans. Mitigation for off-site traffic noise impacts may or may not be feasible, depending on the specific situation. It may not be feasible to implement mitigation measures that would effectively reduce all off-site traffic noise impacts to less-than-significant levels. Beyond Noise Element policies and the Noise Ordinance, there are no feasible additional mitigation measures. This is a **significant and unavoidable** impact.

Impact N-4 Increase in Noise Above Ambient Level

Implementation of the Housing Element accommodates urban development in agricultural areas and on vacant land, where ambient noise levels would be expected to be low. Construction and rehabilitation of housing identified in the Housing Element and supportive infrastructure will temporarily increase ambient noise levels. Long-term operation of urban development will increase the noise level as a result of automobile traffic and other urban noise sources. In addition, development of hard surfaces may result in increased transmission of noise and a further increase in ambient noise levels. This is a **significant and unavoidable** impact.

Notes and References

1 L_{eq} is another variation on the decibel scale that represents a time-averaged noise level. The existing noise environment is from the Lodi Redevelopment Plan EIR, 2002, page 9-7. The noise measurements were taken at intervals from 9 to 30 minutes.

2 State Water Resources Control Board. *Farad Diversion Dam Replacement Project Draft Environmental Impact Report.* March 2002.

3.9 Population and Housing

This section provides supplemental information and evaluation of the Housing Element's potential effects on population and housing.

Environmental Setting

Population

Historically, Lodi has long been one of San Joaquin County's population centers, second only to Stockton. As of Lodi's 2003 population estimate of 60,521 people, Lodi was surpassed by Tracy to become the third largest city in the county. Lodi has been experiencing moderate rates of population growth, whereas the surrounding jurisdiction's populations have been doubling. For example, between 1990 and 2000, Lodi's population increased by 9.8 percent as compared with all other cities in San Joaquin County, which experienced population growth rates of 20 percent or more during the same time period.

Over the next 20 years, the population of Lodi is expected to increase by 21.3 percent, or 12,157 people, according to the San Joaquin Council of Governments (SJCOG). On an annual basis, the 20-year population growth projection is the same as the city's historic population growth rate of approximately one percent per year during the 1990s. The other cities within San Joaquin County are projected to continue to add population at a much faster rate than Lodi at 36 percent and higher over the next twenty years.

Because population growth trends tend to play a major role in development of land use patterns, the City's desire to retain the historic small town character and quality of life throughout Lodi may influence the rate of growth. In addition, City policy related to housing and relevant services may also play a role in impeding significant population growth.

Housing

Growth and Composition

Lodi is a community consisting primarily of single-family homes. As of January 2003, the total number of housing units was 22,189, of which 63 percent, or 14,017 housing units, are traditional detached single-family homes. During the 1990s, nearly 90 percent of the housing that was constructed was comprised of traditional single-family homes. The increase in overall housing stock over the last decade was also influenced by additional attached single-family homes and multiple-family apartments in buildings of five units or more. Since the year 2000, a significant majority of housing units that have been constructed have been traditional single-family or attached single-family homes.

Tenure

Approximately 70 percent of Lodi's housing stock consists of single-family residences, which are typically associated with homeownership. However, in 2000, only 55 percent of Lodi residents were homeowners, which is slightly below the statewide average of 57 percent and significantly below the countywide level of 60 percent. Rising housing costs have limited homeownership opportunities for increasing numbers of Lodi residents. As a result, Lodi is now home to a higher percentage of renter-occupied single-family homes than has historically been the case. Over the last decade, the proportion of rented single-family homes has increased from 24 percent to 25 percent of such housing units. Countywide, only about 20 percent of single family homes are rented. The increase may be indicative of the inability of many Lodi residents to afford homeownership.

Vacancy Rates

The California Department of Finance estimates that as of January 2003, approximately 97 percent of all housing units in Lodi were occupied. Vacancy rates of both rental properties and for sale properties have been decreasing over the last decade. According to the 2000 Census, the effective vacancy rate, or the percentage of units available for sale or rent at a given time, was 2.9 percent for rental housing, a significant decrease from the 4.4 percent effective vacancy rate for rental housing in 1990. The effective vacancy rate for ownership housing was 1.2 percent in 2000, as indicated by the Census.

A survey of local rental property managers indicates that the most recent vacancy rate for rental housing in Lodi for both apartments and single-family homes is probably less than one percent. On average, each property estimates that approximately three units are vacant per year and that they are typically rented very quickly. Low vacancy rates create upward pressure on housing costs because the increase in demand is significantly higher than the increase in supply.

Housing Costs and Overpayment

The imbalance between housing supply and demand as indicated by the low vacancy rates may be the cause of the rise in housing costs in Lodi that has occurred over the last decade. Housing costs have risen to over five times Lodi's median income of $39,489. Rents for market rate apartments and homes have also increased at a faster rate than local incomes. The median cost for a home in Lodi in 2003 was nearly $210,000 and the median market rent was over $800.

Because the cost of housing is increasing at a faster rate than local income, there has been an increase in overpayment by Lodi's residents over the last decade. Households that pay more than 30 percent of their income for housing expenses are considered to be overpaying. In 2000, over 44 percent of renters in Lodi overpaid for housing while 24 percent of homeowners overpaid for housing, which are significant increases for both households types from ten years ago. This increase indicates that there is a growing portion of Lodi's population that is unable to afford homeownership.

In general, low-income households could typically access housing units that are rent-restricted to be affordable to low- and very-low income households. However, rent-restricted housing is extremely

limited in Lodi. At present, only 43 units of government assisted, rent-restricted housing, which provides long-term affordability, are available to Lodi residents of modest means.

Housing Age and Condition

The challenges many Lodi residents face from rising housing costs are compounded by the significant percentage of housing units that are in substandard condition. Nearly half of Lodi's housing is more than 30 years old. Nearly 20 percent is more than 50 years old. Based on past housing condition surveys, the City estimates that as many as 5,500 dwelling units, approximately 25 percent of the housing stock, may need repairs from deferred maintenance to substantial rehabilitation to replacement.

Housing Needs

According to the 2001-2009 Regional Housing Needs Allocation Plan prepared by the SJCOG, Lodi should plan to accommodate 4,014 additional residential units between 2001 and 2009, about 535 units per year. Of those residential units, 1,654 (40 percent) should be affordable to households earning no more than 80 percent of the countywide median income (approximately $40,480 annually). About 2,500 new homes have been added to Lodi's housing stock since 1990, at a construction rate that is less than half of the City's future housing need under the SJCOG regional housing needs plan.

Much of the gap between the prior rate of housing construction and projected housing need may be due to weak demand during the early to mid-1990s. However, the shortage of large, easily developable sites, the City's annual housing permit allocation process as well as other City policies and regulations may also impact the rate of housing construction.

Regulatory Background

Pursuant to California Government Code Section 65302 (c), all cities and counties are mandated to prepare a housing element as part of their comprehensive general plan. California Government Code Section 65583 specifies the contents of housing elements. In general, a housing element will assess the condition and availability of existing housing, analyze the information in relation to anticipated population growth, and determine the future housing needs of a jurisdiction. The housing element is subject to review and approval by the California Department of Housing and Community Development (HCD) in order to ensure that the analysis, goals, policies, and programs are sufficient to meet a jurisdiction's needs. The housing element is required to be updated every five years to accurately reflect a community's changing needs.

Thresholds of Significance

Impact on population and housing is considered potentially significant if the project will:

- Induce substantial population growth is an area, either directly (by proposing new homes and businesses) or indirectly (through extension of roads or other infrastructure).
- Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.
- Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

Methodology

The entire Housing Element Update is incorporated by reference to this EIR. Implementation of the majority of the programs included within the Housing Element Update will not result in potential environmental effects. For the purposes of this section of the EIR, only those policies, goals, and/or programs that may result in environmental effects related to population and housing have been analyzed. The following excerpt includes all relevant Housing Element policies and programs:

Goal A: **To provide a range of housing types and densities for all economic segments of the community while emphasizing high quality development, homeownership opportunities, and the efficient use of land.**

Policies

2. The City shall regulate the number of housing units approved each year to maintain a population-based annual residential growth rate of 2.0 percent, consistent with the recommendations of the Mayor's Task Force and the growth management ordinance.

3. The City shall continue to exempt senior citizen housing projects from the growth management ordinance.

4. The City shall exempt very low- and/or low-income housing units from the growth management ordinance.

9. The City shall grant density bonuses of at least 25 percent and/or other incentives in compliance with state law for projects that contain a minimum specified percentage of very low-income, low-income, qualifying senior housing units or units designed to facilitate individuals with physical challenged.

Program 2: Revise Growth Management Program

The City will revise its growth management program to exempt housing units affordable to very low- or low-income households with long-term affordability restrictions.

Responsibility: Community Development Department
Timeframe: Begin second round of allocations, if needed, in 2005 and annually thereafter
Funding: Application fees
Objective: Expedite the residential development approval process

Program 9: Annexation of Land to Accommodate Future Housing Needs

The City will work with property owners of approximately 600 acres outside the current City limits, but within Lodi's Sphere of Influence (SOI), to plan for, and annex the land to the City so that additional residential development opportunities can be provided to meet Lodi's future housing construction needs. The 600 acres is located between Harney Lane, Lower Sacramento Road, the Woodbridge Irrigation District canal, and the western SOI boundary. The City has facilitated a specific planning process with property owners of approximately 300 acres to prepare these sites for annexation to the City. The development potential for the properties to be annexed is summarized in Table II-1B.

The City does not need to annex all 600 acres within the next three to five years to meet housing construction need given the backlog of unused housing allocations and available sites within the current City limits, but will initiate the process with property owners during the 2003 - 2008 period.

Responsibility: Community Development Department, Planning Commission, City Council
Timeframe: Annex initial 300 acres by December 2005; annex remaining land by December 2008.
Funding: Annexation and permit fees
Objective: Increase the City's residential development capacity to accommodate its share of the region's future housing construction needs between 2001 and 2008, and subsequent years, under the San Joaquin County Council of Governments housing allocation plan

Program 21: Growth Management Program

The City will continue to use its growth management program to ensure that the pace of development is consistent with the City's ability to provide public facilities and services and maintain minimum facility and service standards for the entire community. The City will contact other public facility and service providers annually during the housing unit allocation process to ensure that these agencies can serve the increased number of housing units to be allocated.

Environmental Impact and Mitigation Measures

Impact PH-1 Potential for Growth Inducement

The *Lodi General Plan* establishes a growth management program implemented through Ordinance 1521, which regulates residential growth to two percent per year through 2007 and designates residential land sufficient to meet anticipated housing needs. The continuation of the Growth Management Program is indicated in the Housing Element Update. To ensure that the two percent residential growth rate per year is maintained, Lodi established a residential permit allocation system, which establishes the number of units that can be permitted on a yearly basis. The system

is applied to all residential projects of five dwellings or more, except senior housing developments. Housing units constructed on individual lots that existed prior to the adoption of Ordinance 1521 or in new subdivisions or multifamily projects of one to four housing units are also exempt from the annual allocation limit. The City has established separate allocation limits for single-family and multi-family units.

The City grants residential allocations pursuant to a point system established by the Growth Management Ordinance, which awards points based on issues such as agricultural land conflicts, onsite agricultural land mitigation, relationship to public services, promotion of open space, traffic and circulation levels of service, required traffic improvements, housing and site plan and project design. No individual single family development is allowed to receive more than one third of the permits available in any single year unless the number of applications is less than the total permits available for the year.

Although the City's residential permit allocation process establishes an annual upper limit on the annual allocations, unused allocations may roll over into subsequent years without limit. As of June 2003, the City calculates that there are 1,143 unused low density (single-family) housing unit allocations, 381 medium density (high density single-family or low density multifamily) housing unit allocations, and 1,441 unused high density (multifamily) housing unit allocations.

Based on the two percent annual limit in housing unit allocations, the Community Development Department projects that, between June 2003 and June 2008, approximately 2,300 additional housing unit allocations can be approved, of which 25 percent (575) could be high density housing. The City's share of regional housing needs, as determined by the San Joaquin Council of Governments, totals 4,014 housing units, which includes 1,654 housing units that must be affordable to very low- and low-income households.

Through mechanisms such as the growth management ordinance and allowing higher density development, the City supports its vision to develop in a compact, dense manner, as opposed to the type of urban sprawl commonly seen throughout California. As indicated in Program 9 of the Housing Element Update, the City is expecting to rely on annexation to support the anticipated residential demand.

The City's General Plan establishes "reserve" land; land designated for development of specific land use types, which is recognized for development in the future. The reserve designations include Planned Residential Reserve (PRR), discussed above, and Industrial Reserve (IR). Land identified for annexation in the Housing Element is currently designated for eventual residential development by the General Plan.

The Housing Element Update identifies types of residential development that are exempt from the requirements of the Growth Management Ordinance. These exceptions include housing for seniors and housing that is affordable to low- and very-low income households. The Housing Element Update includes a policy to award density bonuses of at least 25 percent to projects that accommodate affordable housing units. Given that the exceptions are specific to particular residential uses, the "cap" on growth that is provided through implementation of the residential allocation system will not be significantly affected. The impacts related to the potential for growth inducement resulting from implementation of the policies and programs contained in the Housing Element Update are considered **less than significant**.

Impact PH-2 Potential Fragmentation of Development Pattern

As indicated by Program 9 in the Housing Element Update, the City will be required to annex land within the City's Sphere of Influence (SOI) to accommodate anticipated residential demand. Development within the annexation area will be encouraged to be designed in a compact development pattern that compliments existing development throughout Lodi.

The City has a policy of encouraging infill residential development to ensure that new development has sufficient access to municipal utilities and other infrastructure. In addition, infill development is subject to comply with the City's design and improvement standards, which will serve to ensure that infill development is compatible with existing surrounding land uses. The General Plan also indicates that, "The City shall promote the preservation of and shall endeavor to protect the integrity of existing stable residential neighborhoods." In accordance with standard City practice, infill development will be reviewed prior to issuance of requisite permits for compatibility with the surrounding environment.

Implementation of the policies and programs in the Housing Element Update will not result in impacts related to fragmentation of the development pattern of Lodi. There is **no impact**.

3.10 Public Facilities and Services

This section describes the public facilities and services offered to the residents of Lodi by the City and the potential effects of Housing Element implementation on continued provision of services and facilities.

The *Lodi General Plan EIR* considered the environmental impacts associated with the development of the housing units projected in the Housing Element. This EIR will augment and support the analysis conducted for the General Plan, assessing potential impacts brought about by new or modified Housing Element policies. Public Facilities and Services, as defined in this section, include provision of water service, sewer service, solid waste service, parks and recreation, schools, police, fire, and emergency response services.

Environmental Setting

Water Service

The City of Lodi provides water service to all residents within the Project area. The City utilizes 25 wells in and around Lodi to access underground water supplies. The local groundwater table exists 60 feet beneath ground, and existing City wells and treatment facilities serve all residents in the Project area. Surface water is drawn from the Mokelumne River to provide irrigation to agricultural lands within the Planning area, but is not used for human consumption.

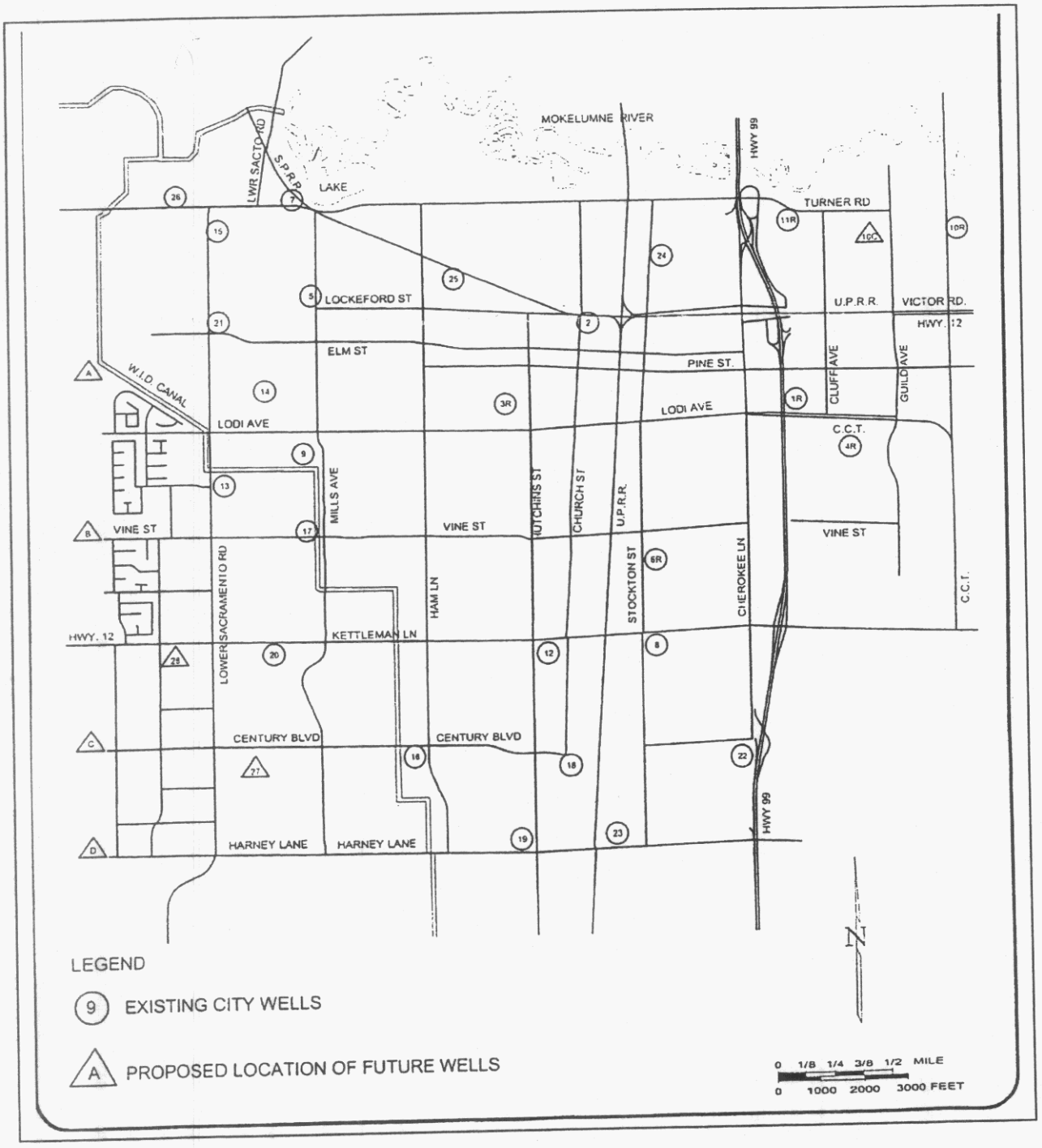
The City has adopted and maintains a *Water Master Plan* to project future demand and ensure that treatment and supply of urban water are provided in a manner suitable to accommodate anticipated growth. Continuous planned upgrades to the water system are called for to ensure that desired levels of service are met. The current City standards require the construction of one well for each additional 2,000 persons added to Lodi's population. With an estimated 57,500 persons residing in Lodi, the City is slightly behind the desired ratio of wells to population. Refer to Figure 3.10-1 for an illustration of existing and proposed well sites.

Expansion of the water system is continuous, with new wells and facilities being added or upgraded as opportunities and funding allow. The *Water Master Plan* provides for the necessary improvements to meet projected service demands through 2007.

Sewer Service

The City of Lodi provides sanitary sewer service to all residents within the Project area. The collection system includes separate domestic, industrial, and storm sewers and related pumping facilities. Untreated sewage is piped to the City's treatment plant through pipes, utilizing both gravity flow and lift stations, where appropriate. The City's sewage treatment plant, known as the White Slough Water Pollution Control Facility, has the capacity to handle 8.5 million gallons per day (mgd). Current estimated waste generation is 6.67 mgd within the Project area.

Figure 3.10-1
Existing and Proposed Well Sites



The City has adopted and maintains a *Wastewater Master Plan* to estimate future infrastructure and service demands within Lodi. Planned upgrades and improvements to the infrastructure and plant will ensure that adequate sewer service is provided to residents of the Project area.

Police Service

There are two providers of police services for the Project area. The City of Lodi provides police protection services to the residents within the city limits, while the San Joaquin Sheriff's Office provides police services for residents within the unincorporated areas of the Sphere of Influence. As unincorporated areas within the Project area are annexed into the city to accommodate planned urban expansion, police services will transition to the City of Lodi Police Department.

The Health and Safety Element of the *Lodi General Plan* sets a target ratio of 1.3 police officers per 1,000 population within the city. The Lodi Police Department, however, strives to maintain a ratio of 1.5 police officers per 1,000 population. As of November 2001, the department employed 78 sworn officers, with a ratio of 1.36 officers per 1,000 residents. The department plans facilities and patrolling to maintain a maximum three-minute response time for emergency calls and 40 minutes for non-emergency calls.

Fire Protection

The City of Lodi Fire Department provides all fire protection services for residents of the city. The department operates four fire stations within the city. Equipment available for use by the Lodi Fire Department staff includes a ladder truck, a grass fire protection unit, three fire engines, a Hazardous Materials (HazMat) unit, as well as two engines in reserve status. The fire department has plans to acquire a new "tiller" ladder truck to further improve service. The fire department has special training for HazMat operations, fire investigations, technical rescue, and an on-staff apparatus technician.

The *Lodi General Plan* establishes a performance threshold of three minutes for response to emergency medical and fire calls. Location of new facilities, staffing levels, and departmental organization are based on meeting this threshold.

The City's *Water Master Plan* addresses infrastructure needs required to maintain sufficient fire flow to meet fire department needs. The Health and Safety Element of the *Lodi General Plan* requires that new developments not reduce water pressure below that required for minimum fire flow rates, and water pressure is monitored throughout the system to ensure that fire flow can be met in all areas of the city.

Public Schools

Public school service for the Project area is provided by the Lodi Unified School District (LUSD), which serves the cities of Lodi, North Stockton, and parts of San Joaquin County. The LUSD provides kindergarten through Grade 12 education in 38 schools and eight additional special purpose facilities.

The LUSD annually prepares a *Needs Analysis Report* to predict student enrollment growth within the District. This report estimates student enrollment growth by dwelling unit type within Lodi. The estimates are based on projections of the District and serves as the basis for analysis within this section. The following table illustrates the projected student increase per new dwelling unit.[1]

Table 3.10-1
Student Generation Rates for New Development

School Type	Low Density Res.	Medium Density Res.	High Density Res.
Elementary	0.55	0.27	0.13
Middle	0.14	0.06	0.04
High	0.27	0.13	0.10

Source: Lodi USD Needs Analysis Report

Current school enrollment within the District is estimated at 27,853, with 31 percent high school students and 69 percent elementary and middle school students. Enrollment at most schools within the District exceeds design capacities. The District has implemented various program changes to accommodate additional students, including year-round and independent study schedules. State law limits the amount of impact fees a school district can charge new development to offset the costs of providing facilities and infrastructure for new students. In 2003, the maximum rate that can be assessed for new residential development is $2.14 per square foot. It is estimated that this amount is far short of the actual costs necessary to fund needed improvements.

Parks and Recreation

All parks and recreation services within the Project area are provided by the City of Lodi. As of March, 2002, the Lodi Parks and Recreation Department maintained 201 acres of parkland and an additional 181 acres of combined parks and detention basins. Lodi's public recreational facilities include a community center, an interpretive center, 20 multi-use football/soccer fields, 18 playgrounds, 11 tennis courts, seven basketball courts, one baseball field, three softball fields, three swimming pools, a 24-space campground, and 3.5 miles of trails. Of the 382 total acres of parkland within the city, 282.5 acres are considered developed, while 99.5 acres remain undeveloped.[2]

The *City of Lodi Park, Recreation, and Open Space Plan* has an overall goal of providing 3.4 acres of parkland per 1,000 residents. This includes 1.5 acres of neighborhood parkland, 1.8 acres of community parkland, and 1,800 square feet of community center space for each 1,000 residents. As of 2001, the City maintained a ratio of 1.51 acres of usable parkland per 1,000 residents[3], well below the stated goal.

Solid Waste

The City contracts with Central Valley Waste Services for refuse and solid waste collection within the Project area. The City maintains a transfer station which receives solid waste generated within the Project area. The North County Sanitary Landfill, in operation since 1991, is used for permanent

storage of solid waste from Lodi, with a permitted daily capacity of 850 tons. Based on current and projected refuse generation, the landfill has sufficient capacity to remain in operation until 2030.

The City of Lodi Public Works Department works with Central Valley Waste Services and San Joaquin County to address projected future needs with regard to services and locations for disposal.

Methodology

The entire Housing Element Update is incorporated by reference to this EIR. Implementation of the majority of the programs included within the Housing Element Update will not result in potential environmental effects. For the purposes of this section of the EIR, only those policies, goals, and/or programs that may result in environmental effects related to public facilities and services have been analyzed. The following excerpt includes all relevant Housing Element policies and programs:

Goal A: **To provide a range of housing types and densities for all economic segments of the community while emphasizing high quality development, homeownership opportunities, and the efficient use of land.**

Policies

2. The City shall regulate the number of housing units approved each year to maintain a population-based annual residential growth rate of 2.0 percent, consistent with the recommendations of the Mayor's Task Force and the growth management ordinance.

3. The City shall continue to exempt senior citizen housing projects from the growth management ordinance.

4. The City shall exempt very low- and/or low-income housing units from the growth management ordinance.

9. The City shall grant density bonuses of at least 25 percent and/or other incentives in compliance with state law for projects that contain a minimum specified percentage of very low-income, low-income, qualifying senior housing units or units designed to facilitate individuals with physical challenged.

12. The City shall promote the development of senior and other special needs housing near, and/or with convenient public transportation access to, neighborhood centers, governmental services, and commercial service centers.

Program 1: Zoning Ordinance Revisions

The City shall revise Title 17 of the Lodi Municipal Code (Zoning Ordinance) to reduce barriers to, and provide incentives for, the construction and conservation of a variety of housing types. Revisions to Title 17 will include the following:

- The addition of a chapter that provides for density bonuses and other incentives for projects that include ten percent very low-income housing, 20 percent low-income housing, 50 percent qualifying senior housing, or 20 percent moderate-income hosing in

condominium conversion projects, in compliance with Sections 65915 - 65918 of the California Government Code. The City shall work with the San Joaquin County Housing Authority in developing procedures and guidelines for establishing income eligibility for the "reserved" units and for maintaining the "reserved" units as affordable units for at least 30 years. The City shall seek Housing Authority administration of the reserved units. The City shall establish a program to publicize the availability of the density bonus program through the City's website, program information at the Community Development Department public counter, and pre-development meetings with housing providers (such as the housing unit allocation stage). The City shall encourage prospective housing developers to use the density bonus program at pre-development meetings. In conjunction with density bonuses, the City will offer one or more regulatory incentives, as needed and appropriate.

- Addition of standards for emergency shelters and transitional housing to clearly identify appropriate zoning districts and locations for such facilities and to make these sites readily accessible. Until the adoption of such revisions to the Zoning Ordinance, the City will continue to allow by right the development of such facilities in areas zoned C-M or C-2.

- Clarification of standards for permitting residential care facilities (such as group homes). The City will specify that all such facilities with six or fewer residents are permitted in residential zoning districts. The City will also designated zoning districts in which facilities of seven or more persons will be permitted through a use permit and standards for such facilities.

- Revision of off-street parking requirements (Chapter 17.60) to allow for less than two spaces per multifamily dwelling unit with fewer than two bedrooms when justified due to the characteristics of the occupants (such as seniors, persons with disabilities, or low-income single working adults) and/or the project location (such as along a public transit route or in the downtown area).

- Revision of standards for second dwelling units to allow the conversion of accessory buildings to second units subject to compliance with all other zoning and parking standards, an appropriate minimum lot size for detached second units, and architectural compatibility with the main dwelling unit. The City will permit second dwelling units through an administrative permit process in compliance with state law (California Government Code section 65852.2).

- Elimination of single-family homes as permitted uses in the R-GA, R-MD, R-HD, and R-C-P zones, except on parcels constrained by lot size, environmental, or other factors that would make the construction of multifamily housing infeasible.

- Reduction in the number of non-residential uses permitted in multifamily residential zones to public and quasi-public uses and supportive services for multifamily residents.

Responsibility:	Community Development Department, Planning Commission, City Council
Timeframe:	Complete zoning code amendments as part of a new unified development code by June 2004.
Funding:	General Fund
Objective:	Reduce regulatory barriers to the provision of housing

Program 2: Revise Growth Management Program

The City will revise its growth management program to exempt housing units affordable to very low- or low-income households with long-term affordability restrictions.

Responsibility:	Community Development Department
Timeframe:	Begin second round of allocations, if needed, in 2005 and annually thereafter
Funding:	Application fees
Objective:	Expedite the residential development approval process

Program 6: Encourage Efficient Use of Land for Residential Development

The City will investigate incentive and regulatory tools to encourage efficient use of land designated or held in reserve for urban development within the existing Lodi Sphere of Influence to reduce the premature conversion of agricultural land to urban use. If determined to be feasible, the City will adopt one or more incentives or regulations. Examples of approaches the City will study and consider are:

- A requirement to mitigate the loss of Prime Farmland through the payment of a fee. Fees collected by the City will be used to foster agricultural production in the Lodi area. This program may fund marketing, research, land acquisition and other programs necessary to promote agricultural production. An option that the City may consider to promote the production of affordable housing is to have this program tied to a sliding scale based on dwelling units per acre. If a development is at the Land Use Element mandated 65% Low Density/10% Medium Density/35% High Density, equivalent to 9.85 dwelling units per acre, then no fee would be collected, a higher density would be provided with a credit while a lower density would be subject to the fee.

- The use of transferred development rights (TDRs) that can be applied to designated areas within the Sphere of Influence. The TDRs might be combined with a density bonus program for agricultural preservation to increase the number of opportunities to use the TDRs. An option that the City of Lodi may consider is to designate sending and receiving areas. A potential sending area for the program could be approximately 0.25 miles south of Harney Lane to Armstrong Road in the area currently designated as Planned Residential Reserve by the Land Use Element of the General Plan. The receiving area for this program could then be designated to areas north of Harney Lane in the Planned Residential portion of the General Plan.

- The use of transitional land use categories, such as residential estates, to provide a further buffer between more intense urban land uses and agricultural land uses.

Responsibility:	Community Development Department, Planning Commission, City Council,
Timeframe:	Complete study and recommend incentives and regulations by June 2005; City Council to adopt incentives or regulations by December 2005.
Funding:	General Fund
Objective:	Preserve agricultural land and reduce the amount of land needed to meet future urban growth needs

Goal C: **To ensure the provision of adequate public facilities and services to support existing and future residential development.**

Program 21: ***Growth Management Program***

The City will continue to use its growth management program to insure that the pace of development is consistent with the City's, the Lodi Unified School District's, and other public facility and service providers' abilities to provide public facilities and services and maintain minimum facility and service standards for the entire community. The City will contact other public facility and service providers annually during the housing unit allocation process to insure that these agencies can serve the increased number of housing units to be allocated.

Responsibility:	Community Development Department, Planning Commission, City Council
Timeframe:	Annually during housing allocation process, 2003 - 2009
Funding:	Application fees, development impact fees
Objective:	To provide public facilities and services meeting minimum City standards

Program 23: **Park and Recreation Facilities**

The City will annually review its Park and Recreation impact fee to ensure that these fees, in combination with other funds that may be available to the City, will allow Lodi to acquire and improve sufficient parkland and provide recreation facilities according to the minimum standards contained in the General Plan Parks, Recreation, and Open Space Element.

Responsibility:	Community Development Department, Planning Commission, City Council
Timeframe:	Annually prior to the adoption of a City budget, 2003 - 2009
Funding:	Development impact fees, state grants for parkland acquisition, private foundation and individual donations
Objective:	To provide park and recreation facilities and services meeting minimum General Plan standards

Thresholds of Significance

The proposed project would have a potentially significant impact on public services if it would:

Water Service

- Conflict with applicable environmental plans adopted by agencies with jurisdiction over the project, or with policies of the community pertaining to water service;
- Require or result in the construction of new water treatment facilities or expansion of existing facilities; or
- Require the agency providing water service to obtain new or expanded water entitlements.
- Contribute to overdraught of local groundwater without demonstrating that replacement water is available.

Sewer Service

- Conflict with applicable environmental plans adopted by agencies with jurisdiction over the project, or with policies of the community pertaining to sewer service;
- Require or result in the construction of new wastewater treatment facilities or expansion of existing facilities; or
- Result in a determination by the wastewater treatment provider that it does not have adequate capacity to serve the project's demand in addition to the provider's existing commitments.

Police Service

- Result in the need for new or altered police service (i.e., require the Police Department to hire new sworn officers to maintain the Department's current staff-to-population ratio or fall below the Department's staff-to-population goal of 1.5 officers per 1,000 population);
- Impair implementation of or result in possible interference with an emergency response plan or emergency evacuation plan; or
- Result in a public service condition that is inconsistent with pertinent adopted City of Lodi General Plan policies.

Fire Protection

- Result in the need for new or altered fire service (i.e., require the Fire Department to hire new staff members to maintain the current staff-to-population ratio);
- Impair implementation of or result in possible interference with an emergency response plan or emergency evacuation plan; or

- Result in a public service condition that is inconsistent with pertinent adopted City of Lodi General Plan policies.

Public Schools

- Result in a public school condition that is inconsistent with adopted local plans and policies, including the City of Lodi General Plan; or
- Result in a need for new or altered school services.

Parks and Recreation

- Result in a parks or recreation condition that is inconsistent with adopted local plans and policies, including the City of Lodi General Plan and the City of Lodi Park, Recreation and Open Space Plan;
- Result in a need for new or altered parks or recreation services (e.g., based on established City park acreage standards of 3.4 acres per 1,000 population (excluding detention basin facilities); or
- 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.

Solid Waste

- Result in a solid waste condition that is inconsistent with adopted local plans and policies, including the City of Lodi General Plan;
- Result in a need for new or altered solid waste services;
- Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs; or
- Result in the inability of the City of Lodi to comply with federal, State and local statutes and regulations related to solid waste.

Environmental Impact and Mitigation Measures

Impact PFS-1 Result in the Need for Expanded or New Public Facilities

Various policies and programs presented in the Housing Element have the potential to impact a variety of City services and facilities, either through exemptions to the growth management ordinance or through approval of second dwelling units. Exemptions from the growth management ordinance may require the construction and operation of additional public facilities, or may

negatively impact existing facilities. The transfer of development rights program could affect the location and scale of public facility improvements as densities and locations of development change under the program.

While variations in the location and density of development have the potential to affect public facilities, such impacts are primarily related to the design of individual lines and systems. The Housing Element does not increase the projected buildout population of the city, nor does it require additional increases in capacity, flow pressure, treatment, or design of water and sewer systems. Increases in densities or locations of new developments may have slight impacts on the provision of solid waste services and need for parks, although major changes are not foreseen. Necessary changes to the designs of individual lines or systems brought about by policies of the Housing Element are best addressed during creation of Improvement Plans for residential projects.

All housing development called for within the Housing Element update is projected to take place within existing city limits and the adopted Sphere of Influence. Specific Plans for new developments within the planned annexation areas will be required to include infrastructure master plans to public utilities and services are extended in accordance with standards and levels of service set forth in the city's existing planning documents. With these policies and regulations in place, it is not anticipated that the Housing Element will result in significant impacts related to the provision of necessary public services. The impact is considered **less than significant**.

Impact PFS-2 Effect on Police and Fire Services and Schools

Increased residential development will affect the ability of the Police and Fire departments and schools to maintain adequate service levels. This potential effect is analyzed below.

Police Services

Increases in density of development and location of new residential structures can affect the ability of the Police Department to effectively provide services. As population of the community grows, additional police facilities, infrastructure, staff, and resources will be necessary to maintain adopted levels of service. The following General Plan policies are found in the Health and Safety Element relating to the provision of police services.

> **Policy 4**
> The Lodi Police Department will continue to participate in the development review process to ensure that crime prevention considerations are incorporated into the design of new development.
>
> **Policy 5**
> The City shall endeavor through adequate staffing and patrol arrangements to maintain the minimum feasible police response times for police calls. The goal for average response time to emergency calls shall be 3 minutes and no longer than 40 minutes for non-emergency calls.
>
> **Policy 6**
> The City shall endeavor to maintain the existing staff ratio of 1.3 officers per 1,000 population. The city shall translate this ratio to dwelling unit equivalents to correspond to the City's fee ordinance.

Policy 7
The City shall assess development fees on all new residential, commercial, office, and industrial development sufficient to fund capital improvements and equipment required to provide police protection.

The City has adopted and maintains an impact fee to cover the anticipated costs of providing capital improvements and equipment necessary to serve the growing population. This Housing Element Update does not change the projected buildout population, nor does it create a development pattern or type that will raise policing costs above and beyond those considered in the General Plan. The present impact fee and policies set forth in the General Plan are sufficient to ensure that impacts of new development on police services are mitigated. The impact of the Project on police services is considered **less than significant**.

Fire Services

Increases in density of development and location of new residential structures can affect the ability of the Fire Department to effectively provide services. As population of the community grows, additional firefighting facilities, infrastructure, staff, and resources will be necessary to maintain adopted levels of service. The following General Plan goals and policies are found in the Health and Safety Element relating to the provision of police services.

Goal C
To prevent loss of lives, injury, and property damage due to urban fires.

Policy 2
The City shall require new development to comply with minimum fire flow rates determined jointly by the City Fire Department and the Public Works Department.

Policy 3
The City shall monitor fire flow capability throughout the City and set a high priority on improving fire flow in those areas where fire flow is not adequate.

Policy 6
The City shall endeavor to at least maintain the existing overall fire insurance (ISO) rating of three.

Policy 7
The City shall endeavor through adequate staffing and station locations to maintain the minimum feasible response time for fire and emergency calls. The goals for travel time by the fire department in responding to an emergency shall be 3 minutes. As areas are developed beyond the 3-minute standard, additional fire stations, capital equipment, and personnel shall be provided or alternative fire protection measures shall be required.

Policy 8
The City shall endeavor to maintain a firefighting staff level consistent with the provision of three-person companies and a 3-minute emergency travel time. The City shall translate this ratio to land use equivalents to correspond to the City's fee ordinance.

Policy 10
The City shall assess development fees on all new residential, commercial, office, and industrial development sufficient to fund capital improvements and equipment required to provide fire protection.

The City assesses a development impact fee on all new residential development to help offset projected costs of providing infrastructure and equipment to meet the growing demands of the fire department. This Housing Element Update does not change the projected buildout population, nor does it create a development pattern or type that will raise firefighting costs above and beyond those considered in the General Plan. The present impact fee and policies set forth in the General Plan are sufficient to ensure that impacts of new development on provision of fire services are mitigated. The impact of the Project on fire services is considered **less than significant**.

Schools

The impacts of development on school services in the State of California led to Assembly Bill 2926 in 1986, which authorized school districts to levy developer fees. The Leroy F. Greene School Facilities Act of 1998 (SB 50) set caps on fees that school districts can levy against residential projects, and sets the CEQA standard for full and complete school facilities mitigation. Codified as Section 65995 of the Public Resources Code, this law states that a project developer can only be required to pay the adopted school impact mitigation fee of a jurisdiction, with no additional financial or regulatory requirements to mitigate impacts on schools. The maximum fees for residential and non-residential development continue to be set by the State, and are adjusted every two years for inflation. The current maximum for residential development is $2.14 per square foot.

Larger residential projects and specific plans may be required to dedicate a certain amount of land necessary to meet school expansion needs, including sites for new schools. For smaller projects or larger projects where the school district determines that additional sites are not necessary or feasible for a new school, payment of adopted school fees is considered sufficient to mitigate impacts of residential and commercial development on the Lodi Unified School District. Impacts related to the programs and policies of the Housing Element are **less than significant**.

Notes and References

[1] Lodi Unified School District, as referenced in *City of Lodi General Plan Policy Document.* 1991.
[2] City of Lodi. ICMA Center for Performance Measurement, FY 2001, Parks and Recreation Template.
[3] Ibid

3.11 Transportation

The impact of the Housing Element Update related to transportation, circulation, and parking is assessed in this section. The analysis considers existing traffic conditions prior to Housing Element adoption as the baseline and outlines impacts directly associated with Housing Element implementation. Cumulative conditions associated with future development in Lodi and the surrounding areas are also addressed.

Environmental Setting

Characteristics of transportation systems in the area are described below.

Study Area Streets and Intersections

Lodi is served by State Routes 99 and 12 (SR 99 and SR 12) and is located along the main line of the Union Pacific Railroad. Interstate 5 (I-5) is located to the west of the city. Lodi's automobile circulation system is comprised of various San Joaquin County roads, City-maintained roads, and SR 99 and SR 12.

State Routes 99 and 12

SR 99 is one of the major north-south travel corridors traversing central California. SR 99 originates at an interchange with Interstate 5 and State Route 36 in Red Bluff in the northern Sacramento Valley, and rejoins Interstate 5 south of Bakersfield. SR 99 is oriented north and south, and is located along the eastern portion of the city. It is a four-lane controlled-access freeway with interchanges at Kettleman Lane (SR 12), Turner Road, Victor Road, Harney Lane, Century Boulevard, and Armstrong Road. SR 12, also known as Kettleman Lane, is oriented east to west, and is located on the southern side of Lodi. It has five lanes, and is an at-grade arterial.

Major City Streets

Other major existing roadways include the following (number of lanes is indicated in parentheses):

- Lodi Avenue (4)
- Cherokee Lane (5)
- Turner Road (4)
- Lockeford Street (2-4)
- Church Street (2-4)
- Stockton Street (2-3)
- Elm Street (2)
- Pine Street (2)
- Hutchins Street (2-3)
- Ham Lane (4)
- Lower Sacramento Road (2)

- Harney Lane (2)
- Century Boulevard (2-4)

Future Street Network

As identified by Lodi's General Plan, several roadways are expected to require lane additions to accommodate planned development. Figure 3.11-1 summarizes these roadway expansion plans. As shown, Kettleman Lane is expected to be a six-lane, divided arterial; Lower Sacramento Road is expected to be a four-lane, undivided roadway; and Lodi Avenue is expected to be a four-lane, undivided road.

Non-Automotive Transportation

Lodi Transit, operated by the City, offers scheduled daily bus service from origins and destinations throughout the city, including the following routes (Table 3.11-1):

Table 3.11-1
Transit Routes

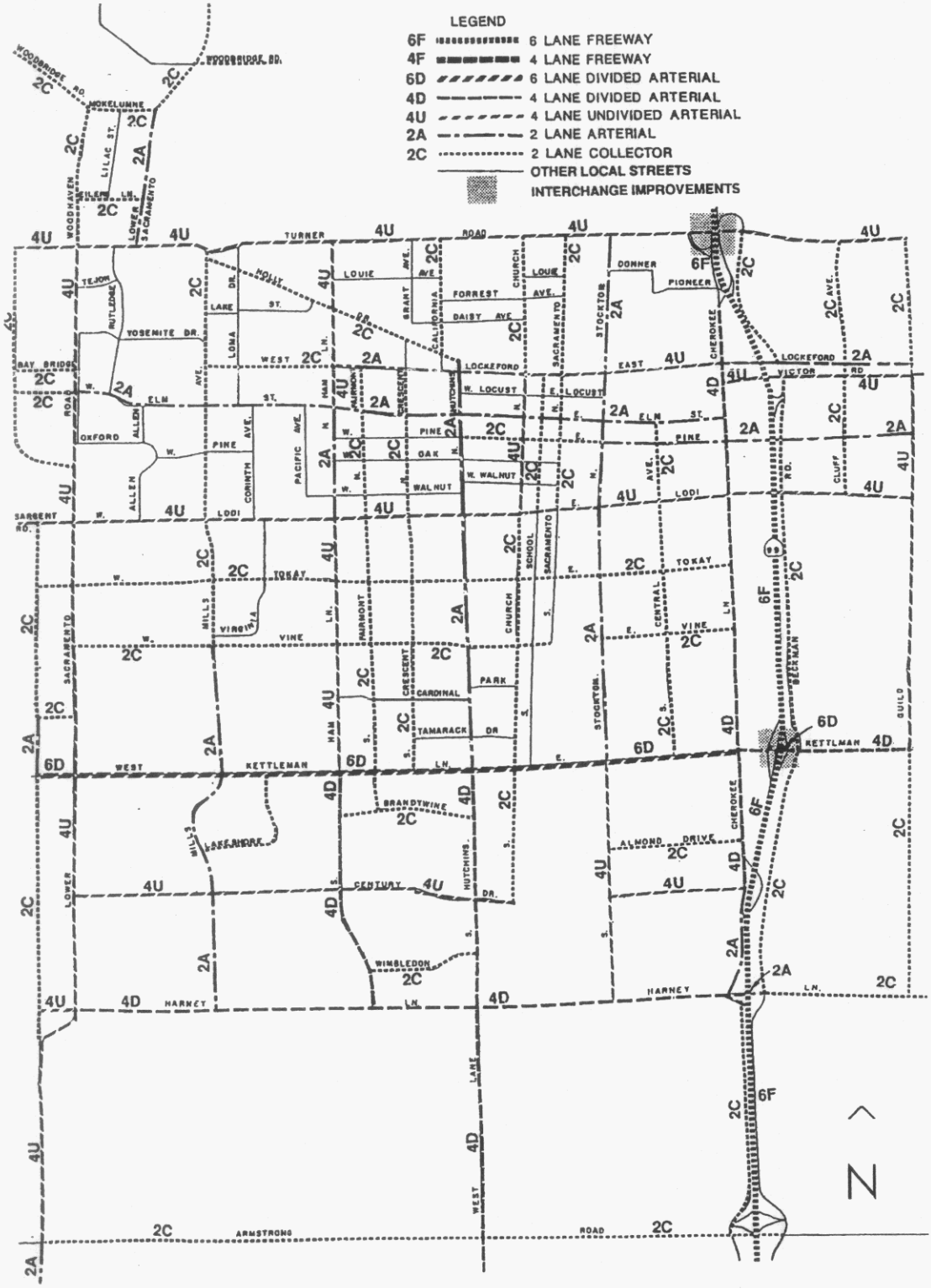
Route Number	Route Name	Path
Route 1	Church/ Lower Sacramento	Travels along North Church Street, Turner Road, Lodi Lake and Lower Sacramento Road to Wal-Mart and Target.
Route 2	Central	Travels along Central Avenue and Kettleman Lane to Wal-Mart and Target.
Route 3	Ham	Travels along Lockeford Street, Elm Street, Ham Lane to Harney.
Route 4	Century	Travels along Lodi Avenue, Fairmont Avenue, Vine Street, South Church Street, Century Boulevard, Mills Lane to Wal-Mart and Target.
Route 5	Cherokee	Travels through Northeast Lodi, Cluff Avenue, Cherokee Lane to Almond Drive.

Source: City of Lodi web site, 2003.

Lodi Transit coordinates connections to Manteca, Lathrop, Tracy, and Stockton through San Joaquin Regional Transit and to Galt, Elk Grove, and Sacramento through Sacramento South County Transit. The City also provides Dial-A-Ride service, a demand-response transit service throughout the Lodi area seven days a week.

An Amtrak stop is located at the Lodi Transit Center, 24 South Sacramento Street, in a recently renovated facility. Amtrak San Joaquin motor coaches connect to San Joaquin trains in Stockton and to California Zephyr, Capitol Trains, and the Coast Starlight in Sacramento.

Figure 3.11-1
2007 Roadway Network



Source: City of Lodi General Plan Policy Document, 1991; Adapted by Cotton/Bridges/Associates, 2003.

Sidewalks exist along Lodi streets for pedestrian travel, and bicycle lanes provide additional non-automobile transportation options. Class II Bikeways exist along both north-south and east-west roadways, especially in the western and southwestern portions of the city. A Class II Bikeway is a bike lane that lies along the edge of the paved area of a road, is designated as a bike lane, and is demarcated with striping and signing. Proposed Class II Bikeways would extend the existing bike lane along Elm Street westward to Peterson Park and connect Hale Park to areas east of the downtown (also along Elm Street.

Existing Levels of Service

Level of Service (LOS) is a measure of traffic operating conditions whereby a letter grade, "A" through "F," corresponding to progressively worsening operating conditions, is assigned to an intersection or roadway segment.

The City tracks traffic conditions on each of its roadways, and plans infrastructure improvements to prevent congestion. For improvements planning, the City uses the following method to convert the volume over capacity ratio to LOS:

Volume/Capacity	LOS
0 - 0.60	LOS A
0.61 - 0.70	LOS B
0.71 - 0.80	LOS C
0.81 - 0.90	LOS D
0.91 - 1.00	LOS E/F

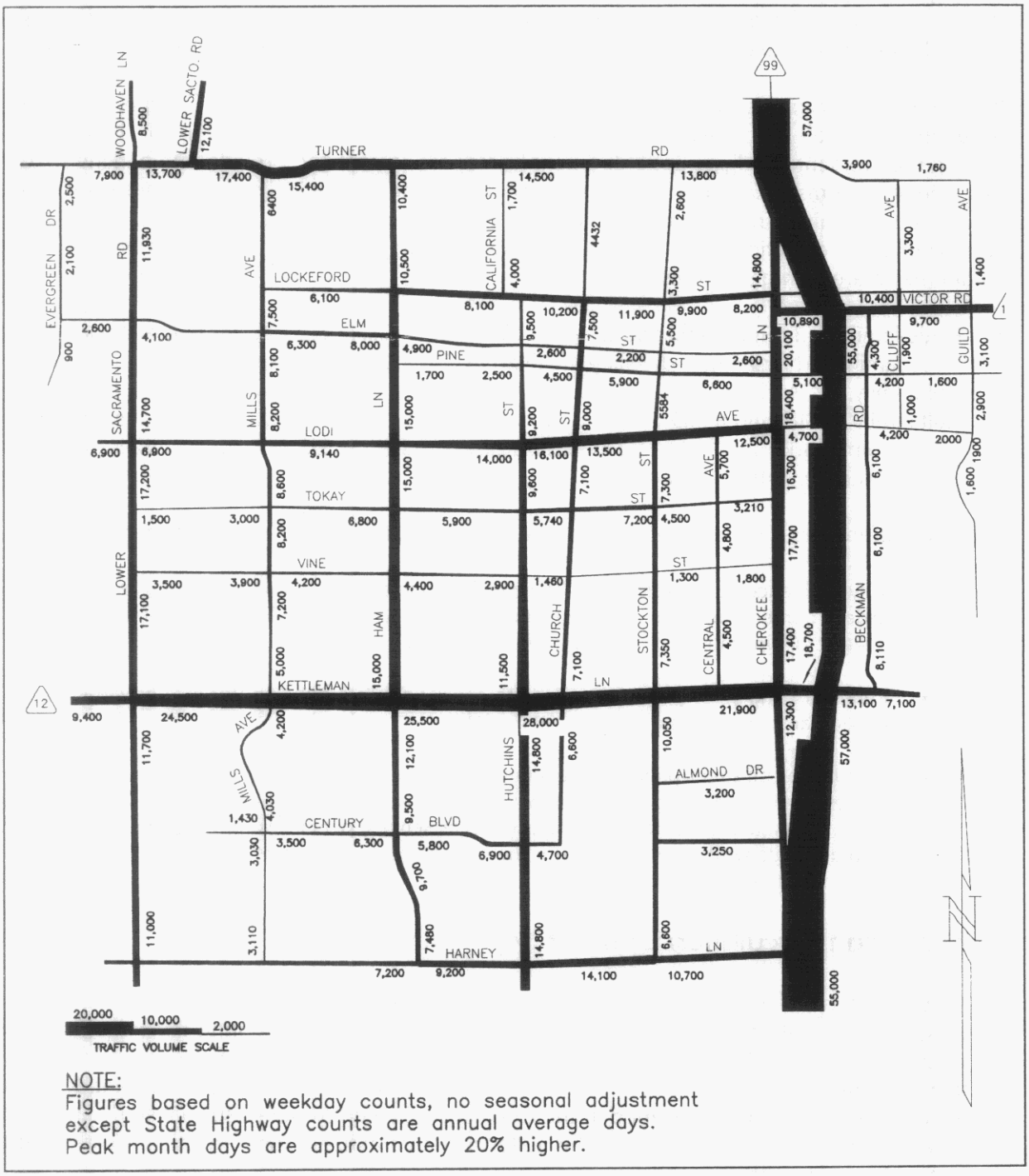
The City has planned roadway improvement projects to facilitate the array of land uses envisioned in the General Plan at buildout. Table 3.11-2 shows roadway segments where existing traffic volumes are at 50 percent or more of the planned capacity of the roadway. Existing daily traffic volumes for all city roadways are available from the City (Figure 3.11-2). Daily traffic volumes on Kettleman Lane are approaching 28,000 near Hutchins Street and 26,000 near the intersection with Ham Lane. Traffic on Lodi Avenue near Hutchins Street is at approximately 16,000.

Table 3.11-2
Roadway Volumes and General Plan Capacity

Street	Segment	Existing Daily Volume	Planned Geometry	Planned Capacity	Planned V/C
Cherokee Ln.	Lockeford St. - Lodi Ave.	20,100	4 Lanes W/ LT	35,000	0.57
Cherokee Ln.	Lodi Ave. - Kettleman Ln.	20,400	4 Lanes W/ LT	35,000	0.58
Church St.	Lodi Ave. - Kettleman Ln.	7,100	2 Lanes	12,500	0.57
Church St.	Kettleman Ln. - Century Blvd.	6,600	2 Lanes	12,500	0.53
Ham Ln.	Lockeford St. - Elm St.	13,000	4 Lanes	25,000	0.52
Ham Ln.	Elm St. - Lodi Ave.	15,000	4 Lanes	25,000	0.60
Ham Ln.	Lodi Ave. - Vine St.	15,000	4 Lanes	25,000	0.60
Ham Ln.	Vine St. - Kettleman Ln.	15,000	4 Lanes	25,000	0.60
Kettleman Ln. (Hwy 12)	Lwr Sac Rd. - Ham Ln.	24,500	6 Lanes W/ LT	45,000	0.54
Kettleman Ln. (Hwy 12)	Ham Ln. - Hutchins St.	25,500	6 Lanes W/ LT	45,000	0.57
Kettleman Ln. (Hwy 12)	Hutchins St. - Stockton St.	28,000	6 Lanes W/ LT	45,000	0.62
Lodi Ave.	Ham Ln. - Hutchins St.	14,000	4 Lanes	25,000	0.56
Lodi Ave.	Hutchins St. - Church St.	16,100	4 Lanes	25,000	0.64
Lodi Ave.	Stockton St. - Central Ave.	13,500	4 Lanes	25,000	0.54
Lower Sacramento Rd.	Vine St. - Kettleman Ln.	17,900	4 Lanes W/ LT	35,000	0.51
Mills Ave.	Turner Rd. - Elm St.	7,500	2 Lanes	12,500	0.60
Mills Ave.	Elm St. - Lodi Ave.	8,200	2 Lanes	12,500	0.66
Mills Ave.	Lodi Ave. - Vine St.	8,600	2 Lanes	12,500	0.69
Tokay St.	Mills Ave. - Ham Ln.	7,200	2 Lanes	12,500	0.58
Tokay St.	Ham Ln. - Hutchins St.	5,900	2 Lanes	12,500	0.47
Tokay St.	Hutchins St. - Stockton St.	7,200	2 Lanes	12,500	0.58
Turner Rd.	N. Lwr Sac Rd. - Mills Ave.	17,400	4 Lanes	25,000	0.70
Turner Rd.	Mills Ave. - Ham Ln.	15,400	4 Lanes	25,000	0.62
Turner Rd.	Ham Ln. - Church St.	14,500	4 Lanes	25,000	0.58
Turner Rd.	Church St. - Hwy 99	13,800	4 Lanes	25,000	0.55

Source: City of Lodi, 2003.

Figure 3.11-2
Existing Daily Traffic Volumes



NOTE:
Figures based on weekday counts, no seasonal adjustment except State Highway counts are annual average days. Peak month days are approximately 20% higher.

Source: City of Lodi. April 2003.

Parking

Parking is adequate to satisfy existing demand, according to the City's 1991 General Plan.[1] Some short-term parking deficit occurs in the downtown area, and there are some parking shortages in some older commercial centers where road widening has removed some on-street parking.

Parking ratios for residential uses in Lodi are determined by dwelling unit type, regardless of occupancy. For all residential uses including mobile homes, two spaces per unit is the standard parking requirement. Lodging and retirement homes are required to provide one parking space per two sleeping rooms. Convalescent homes and rest homes are subject to different standards that require one parking space per three beds. The City provides an administrative process for approving minor deviations from zoning standards; including parking requirements. Current parking requirements are summarized below:

- Single-family and duplex, all zones.....2 covered spaces per unit
- Three-family and four-family dwelling, R-LD zone.....2 spaces per unit, 2/3rd covered
- Multifamily, R-GA zone.....2 spaces per unit, 2/3rd covered,
- Multifamily, R-MD and R-HD zones.....2 spaces per unit
- Mobilehome Park.....2 spaces per unit
- Lodginghouse or retirement home.....1 space per each two sleeping rooms

Program 1 of the Housing Element involves the following changes to parking requirements:

> The City shall encourage prospective housing developers to use the density bonus program at pre-development meetings. In conjunction with density bonuses, the City will offer one or more regulatory incentives, as needed and appropriate, such as:
>
> - Reduced parking for projects oriented to special needs groups and/or located close to public transportation and commercial services...
>
> - Revision of off-street parking requirements (Chapter 17.60) to allow for less than two spaces per multifamily dwelling unit with fewer than two bedrooms when justified due to the characteristics of the occupants (such as seniors, persons with disabilities, or low-income single working adults) and/or the project location (such as along a public transit route or in the downtown area).

General Plan Circulation Element Key Policies

The City's General Plan Circulation Element establishes goals and policies for the transportation network, including infrastructure improvements that will be necessary during the Housing Element planning period. New development consistent with the Circulation Element is required to pay its fair share of traffic impact fees to fund transportation improvements, while development determined to generate more traffic than assumed in the Circulation Element requires special study and funding of additional traffic improvements. The following summarizes some of the most important Circulation Element policies:

Goal A Policies:

1. The City shall strive to maintain Level of Service C on local streets and at intersections. The acceptable level of service goal will be consistent with the financial resources available and limits of technical feasibility.
2. The City shall time the construction of new development such that the time frame for completion of the needed circulation improvements will not cause the level of service goals to be exceeded.
4. The City shall require dedication, widening, extension, and construction of public streets in accordance with the City's street standards. Major street improvements shall be completed as abutting land develop or redevelop. In currently developed areas, the City may determine that improvements necessary to meet City standards are either infeasible or undesirable.
5. The City shall review new developments for consistency with the GP Circulation Element and the capital improvements program. Those developments found to be consistent with the circulation Element shall be required to pay their fair share of traffic impact fees and/or charges. Those developments found to be generating more traffic than that assumed in the Circulation Element shall be require to prepare a site-specific traffic study and fund needed improvements not identified in the capital improvement program, in addition to paying their fair share of the traffic impact fee and/or charges.

Goal B Policies:

1. The City shall require new developments to provide an adequate number of off-street parking spaces in accordance with City parking standards. These parking standards should be periodically reviewed and updated.

Methodology

The Housing Element Update is incorporated by reference by this EIR. Implementation of the majority of the programs included within the Housing Element Update will not result in potential environmental effects. For the purposes of this section of the EIR, only those policies, goals, and/or programs that may result in environmental effects related to transportation systems have been analyzed. Mitigation measures included in the General Plan EIR that would reduce impacts to the transportation system are not altered by the Housing Element or the Housing Element EIR and are considered as a part of the impact analysis in this section. The following excerpt includes all relevant Housing Element policies and programs (including those that will reduce potential environmental impacts of Housing Element implementation, such as Goal A, Program 3, which ensures emergency access):

Goal A: **To provide a range of housing types and densities for all economic segments of the community while emphasizing high quality development, homeownership opportunities, and the efficient use of land.**

3. The City shall continue to exempt senior citizen housing projects from the growth management ordinance.

4. The City shall exempt very low- and/or low-income housing units from the growth

management ordinance if necessary to meet the City's share of regional housing needs, as required by state law.

10. The City shall seek to intersperse very low- and low-income housing units within new residential developments and shall ensure that such housing is visually indistinguishable from market-rate units.

13. The City shall encourage infill residential development and higher residential densities within the existing City limits near transit stops, and compact development patterns in annexation areas to reduce public facility and service costs, avoid the premature conversion of natural resource and agricultural lands, and reduce the number of trips from private vehicles.

Program 1: Zoning Ordinance Revisions

The City shall revise Title 17 of the Lodi Municipal Code (Zoning Ordinance) to reduce barriers to, and provide incentives for, the construction and conservation of a variety of housing types. Revisions to Title 17 will include the following:

a. The addition of a chapter that provides for density bonuses and other incentives for projects that include ten percent very low-income housing, 20 percent low-income housing, 50 percent qualifying senior housing, or 20 percent moderate-income hosing in condominium conversion projects, in compliance with Sections 65915 - 65918 of the California Government Code. The City shall work with the San Joaquin County Housing Authority in developing procedures and guidelines for establishing income eligibility for the "reserved" units and for maintaining the "reserved" units as affordable units for at least 30 years. The City shall seek Housing Authority administration of the reserved units. The City shall establish a program to publicize the availability of the density bonus program through the City's website, program information at the Community Development Department public counter, and pre-development meetings with housing providers (such as the housing unit allocation stage). The City shall encourage prospective housing developers to use the density bonus program at pre-development meetings. In conjunction with density bonuses, the City will offer one or more regulatory incentives, as needed and appropriate, such as:

    - Reduced parking for projects oriented to special needs groups and/or located close to public transportation and commercial services;
    - Expedited permit processing; or
    - Deferral of fees for an appropriate time period to allow for the project to begin generating income.

b. Conformance with California Government Code sections 65852.3 and 65852.7, which require that manufactured homes in single-family zones on permanent foundations be permitted under the same standards as site-built homes (with limited exceptions) and that mobilehome parks be permitted in any residential zone (although the City may require a use permit).

c. Addition of standards for emergency shelters and transitional housing to clearly identify appropriate zoning districts and locations for such facilities and to make these sites readily accessible. Until the adoption of such revisions to the Zoning Ordinance, the City will continue to allow by right the development of such facilities in areas zoned C-M or

C-2.

d. Addition of a definition of farmworker housing that does not conflict with state law definitions for employees housing (beginning with California Government Section 17000) and specification of the zoning districts and standards under which such housing will be permitted.

e. Clarification of standards for permitting residential care facilities (such as group homes). The City will specify that all such facilities with six or fewer residents are permitted in residential zoning districts. The City will also designated zoning districts in which facilities of seven or more persons will be permitted through a use permit and standards for such facilities.

f. Revision of off-street parking requirements (Chapter 17.60) to allow for less than two spaces per multifamily dwelling unit with fewer than two bedrooms when justified due to the characteristics of the occupants (such as seniors, persons with disabilities, or low-income single working adults) and/or the project location (such as along a public transit route or in the downtown area).

g. Revision of standards for second dwelling units to allow the conversion of accessory buildings to second units subject to compliance with all other zoning and parking standards, an appropriate minimum lot size for detached second units, and architectural compatibility with the main dwelling unit. The City will permit second dwelling units through an administrative permit process in compliance with state law (California Government Code section 65852.2).

h. Elimination of single-family homes as permitted uses in the R-GA, R-MD, R-HD, and R-C-P zones, except on parcels constrained by lot size, environmental, or other factors that would make the construction of multifamily housing infeasible.

i. Reduction in the number of non-residential uses permitted in multifamily residential zones to public and quasi-public uses and supportive services for multifamily residents.

Responsibility: Community Development Department, Planning Commission, City Council
Timeframe: Complete zoning code amendments as part of a new unified development code by June 2004.
Funding: General Fund
Objective: Reduce regulatory barriers to the provision of housing

Program 2: Revise Growth Management Program

The City will revise its growth management program to exempt housing units affordable to very low- or low-income households with long-term affordability restrictions.

Responsibility: Community Development Department
Timeframe: Begin second round of allocations, if needed, in 2005 and annually thereafter
Funding: Application fees
Objective: Expedite the residential development approval process

Program 3: Personal Security Standards

The City will continue to implement design standards applicable to all new residential projects with the objective of improving the personal security of residents and discouraging criminal activity. Design standards will address issues such as the placement of landscaping, accessory buildings, and accessory structures in a manner that does not impede the City's ability to conduct neighborhood police patrols and observe potential criminal activity; lighting and other security measures for residents, and the use of materials that facilitate the removal of graffiti and/or increase resistance to vandalism.

Responsibility: Community Development Department
Timeframe: Current and ongoing, 2003 - 2009
Funding: Permit fees
Objective: Reduce the susceptibility of residential properties and neighborhoods to criminal activity and increase residents' perception of personal safety

Program 4: Land Inventory

The City shall prepare and maintain a current inventory of vacant, residentially zoned parcels and a list of approved residential projects, and shall make this information available to the public and developers, including information on underutilized sites within the downtown area with residential or mixed-use development potential. The City shall update the inventory and list at least annually. The City will promote the land inventory and the availability of each update through the City's web site, a notice at the Community Development Permit Counter, and a press release subsequent to each update.

To encourage the maximum efficient use of land within the current City limits, Lodi will also conduct a study of residential development potential on underutilized industrial and commercial sites along Cherokee Lane, South Sacramento Street, South Stockton Street, and West Kettleman Lane. Properties along these corridors may be suitable for future residential development if sufficient land can be consolidated to make such development feasible (see Figures 2-3 through 2-5, which follow). These areas are characterized by obsolete patterns of land development, older structures in substandard condition, odd-sized lots, and marginally viable commercial and industrial uses that would make properties ripe for redevelopment in the next five to ten years. If Lodi determines that residential development is feasible along these streets, the City will initiate a planning process with property owners (which may be a special area plan or a specific plan meeting state law requirements) to define specific properties suitable for residential or mixed-use development, appropriate development standards, and improvements needed to support residential development.

Responsibility: Community Development Department, Planning Commission, City Council
Timeframe: Complete study of residential development potential by December 2006; prepare and adopt area plan(s) by December 2009.
Funding: General Fund, contributions from property owners
Objective: Increase the potential for infill development, thereby reducing the need to prematurely annex land and convert agricultural land to urban use

Program 9: Annexation of Land to Accommodate Future Housing Needs

The City will work with property owners of approximately 600 acres outside the current City limits, but within Lodi's Sphere of Influence (SOI), to plan for, and annex the land to the City so that additional residential development opportunities can be provided to meet Lodi's

future housing construction needs. The 600 acres is located between Harney Lane, Lower Sacramento Road, the Woodbridge Irrigation District canal, and the western SOI boundary. The City has facilitated a specific planning process with property owners of approximately 300 acres to prepare these sites for annexation to the City. The development potential for the properties to be annexed is summarized in Table II-1B.

The City does not need to annex all 600 acres within the next three to six years to meet housing construction needs given the backlog of unused housing allocations and available sites within the current City limits, but will initiate the process with property owners during the 2003 - 2009 period.

Responsibility: Community Development Department, Planning Commission, City Council
Timeframe: Annex initial 300 acres by December 2005; annex remaining land by December 2009.
Funding: Annexation and permit fees
Objective: Increase the City's residential development capacity to accommodate its share of the region's future housing construction needs between 2001 and 2009, and subsequent years, under the San Joaquin County Council of Governments housing allocation plan

Thresholds of Significance

Project impacts would be significant if the Project would:

- Degrade acceptable (LOS A, B, C or D) operating conditions at a signalized intersection to LOS E or F operating conditions. For intersections already operating at an unacceptable LOS E or F, the Project impact would be considered significant if the Project would increase volumes passing through the intersection by five percent or more;

- Degrade acceptable (LOS A, B, C or D) operating conditions on all all-way-stop intersections to LOS E or F operation. For all-way-stop intersections with unacceptable LOS E or F, the project impact would be considered significant if the Project would increase volumes passing through the intersection by five percent or more;

- Cause volumes at all-way-stop intersection with volumes less than CalTrans Warrant #11 urban peak hour signal warrant criteria levels to meet or exceed signal Warrant #11 criteria levels. For intersections with volumes already exceeding peak hour signal warrant criteria levels (e.g., LOS E or F), the Project impact would be considered significant if the Project would increase peak hour volumes passing through the intersection by five percent or more;

- Result in increased use of local transit above projected capacities and expansion of transit capacity would have significant impacts;

- Result in on- or off-site parking demand exceeding the projected supply of available spaces; or

- Prevent or obstruct emergency access.

Environmental Impact and Mitigation Measures

Impact TC-1 Adverse Effect on Roadway and Intersection Level of Service

Introduction of additional residential development into areas of the city with congested roadways may reduce intersection levels of service to unacceptable levels. Increased density and infill development would create challenges for transportation planning. Development encouraged by the Housing Element Update also may create congestion where roadways previously functioned at uncongested levels, or may change the distribution of traffic patterns in such a way that levels of service are adversely affected. Introduction of urban development into agricultural areas of the city to the south and west would present capacity issues for rural roadways.

As future housing projects are proposed throughout the city, they will be required to analyze the site specific, development specific traffic impacts and mitigate, wherever feasible. Housing development of undeveloped areas would occur under a development plan with an accompanying traffic impact analysis. Levels of service for affected intersections and roadway segments would be analyzed under pre- and post-project conditions and cumulative conditions. Wherever the housing project contributed to an unacceptable level of service, the project would be required to provide signalization, additional lanes, intersection improvements, or other solutions to reduce travel demand and/or increase roadway capacity.

The City requires new development to be consistent with, and pay a fair share toward traffic improvements identified in the Circulation Element and capital improvements program. Inconsistent development would require site-specific traffic study and funding of any necessary improvements not identified in the capital improvement program, in addition to paying a fair share of capital improvements projects. Additionally, the City requires an adequate number of off-street parking spaces in accordance with City parking standards for all new development. Housing Element Program 1 identifies a reduction of parking requirements when justified for:

- Projects oriented to special needs groups and/or located close to public transportation and commercial services; and,
- Multifamily dwelling units with fewer than two bedrooms when justified due to the characteristics of the occupants (seniors, persons with disabilities, or low-income single working adults) and/or the project location (such as along a public transit route or in the downtown area).

These parking requirements, targeted at housing development with relatively low levels of traffic generating characteristics, would not be expected to result in inadequate parking that would cause substantial safety or congestion impacts.

Increased density in areas with existing transit service and with a mix of land uses would make walking, bicycling, and use of transit more attractive and convenient, thus reducing the demand on local roadways, consistent with General Plan Circulation Element Goals C, E, and G.

In some built out areas of the city, if additional housing development or additional density is accommodated through future housing projects, typical automobile traffic mitigation may not be feasible or appropriate to relieve peak hour congestion. Additional right-of-way may be difficult to acquire. These potential problems were anticipated in the Circulation Element (Goal A, Policy 4), which indicates that meeting City congestion standards in redeveloping areas may be infeasible or undesirable. This is a **significant and unavoidable** impact.

Impact TC-2 Demand for Transit Service

The Housing Element Update encourages development of senior and special needs housing near transit, infill development, and higher density development, all of which would increase the demand for transit service.

Funding for Lodi Transit comes from rider fares and from the City's General Fund. Any increased ridership would produce additional revenue from fares to be used for adding routes or increasing service frequency to accommodate additional demand. Also, increased residential development would produce additional revenue for the City, which could be allocated to Lodi Transit for additional routes or increased service. Therefore, the impact to the City's ability to maintain transit service levels is considered **less than significant.**

Notes and References

[1] City of Lodi. *Draft General Plan Background Report.* January 1990.

APPENDICES

APPENDIX A

NOTICE OF PREPARATION

TO: Responsible Agencies
Trustee Agencies
Interested Parties

SUBJECT: **Notice of Preparation of a Draft Environmental Impact Report**
City of Lodi Housing Element Update EIR

Lead Agency
City of Lodi
Community Development Department
221 West Pine Street
Lodi, CA 95240
Attn: J.D. Hightower, City Planner

EIR Consultant
Cotton/Bridges/Associates
3840 Rosin Court, Suite 130
Sacramento, CA 95834
Attn: Randy M. Chafin, AICP

The City of Lodi will be the Lead Agency in the preparation of an environmental impact report (EIR) for the subject Project. The City requests your views relative to the scope and content of the environmental information that is pertinent to your agency's statutory responsibilities. Your agency will need to use the EIR prepared by the City of Lodi when considering your permit or other approval for the Project.

The proposed Project is comprehensive update to the City's Housing Element of the General Plan. The proposed Project is described more completely in the attached Exhibit 1, Preliminary Project Description, which includes narrative and graphic descriptions of the Project and its location.

As a programmatic document presenting policies and strategies for development throughout the community, a full-scope EIR will be prepared and will include an analysis of all CEQA-mandated topics.

Due to the time limits mandated by State law, your response must be sent at the earliest possible date, ***but not later than 30 days***, following receipt of this Notice of Preparation (NOP).

Please send written comments to the City of Lodi Community Development Department, ATTN: Mr. J.D. Hightower, City Planner, at the address shown above. Be sure to include the name of the contact person at your agency.

Project Title: Lodi Housing Element Update EIR
Project Applicant: City of Lodi
Project Location: Lodi is located in the northern San Joaquin Valley, along the Mokelumne River and between State Route 99 and Interstate 5. The city is approximately 10 square miles in area, with a Sphere of Influence that extends beyond the jurisdictional borders. The Project area includes the entire city limits and areas in the City's Sphere of Influence.

Date: October 20, 2003

EXHIBIT 1
PRELIMINARY PROJECT DESCRIPTION
Lodi Housing Element Update

The Project analyzed in this Program EIR is the Draft 2003-2008 Housing Element of the Lodi General Plan, which is an update of the Housing Element that was adopted in 1991. The Draft 2003-2008 Housing Element Update is hereby incorporated by reference in this Project description and consists of the principal components described below.

- ***Goals*** of the Housing Element present a general statement of intent, or purpose, for both the Policies and the Programs identified in the Element. Goals represent the most general of the City's visions for the Housing Element, and were developed in close consultation with members of the community and appropriate service providers through workshops and public review and comment. Due to their general nature, changes to Housing Element Goals do not lend themselves to environmental analysis, though they do indicate the intent of the City in implementing Policy and Program changes, the impacts of which will be analyzed.

- ***Policies*** are specific methods of implementing the Goals. The most important Policies for this EIR are those that would accommodate or require activities that would have physical environmental consequences.

- ***Programs*** specify the methods and timelines for implementing Housing Element Goals and Policies. Typically, programs identify the specific department or division of the City charged with their implementation. Programs are directly tied to Housing Element Policies and designed to achieve the Goals through the management of land use and development, regulatory concessions or restrictions, and utilization of appropriate financing and subsidy programs.

- ***Quantified Objectives*** are useful in implementing the Housing Element, tracking its implementation through annual Housing Element and General Plan reporting and assessment, and can be helpful in identifying the level of environmental impact of the Housing Element's Policies and Programs. While some Policies and Programs would be too general to precisely define likely environmental impacts, attaching quantified objectives allows a more precise assessment, and a more sophisticated form of environmental analysis.

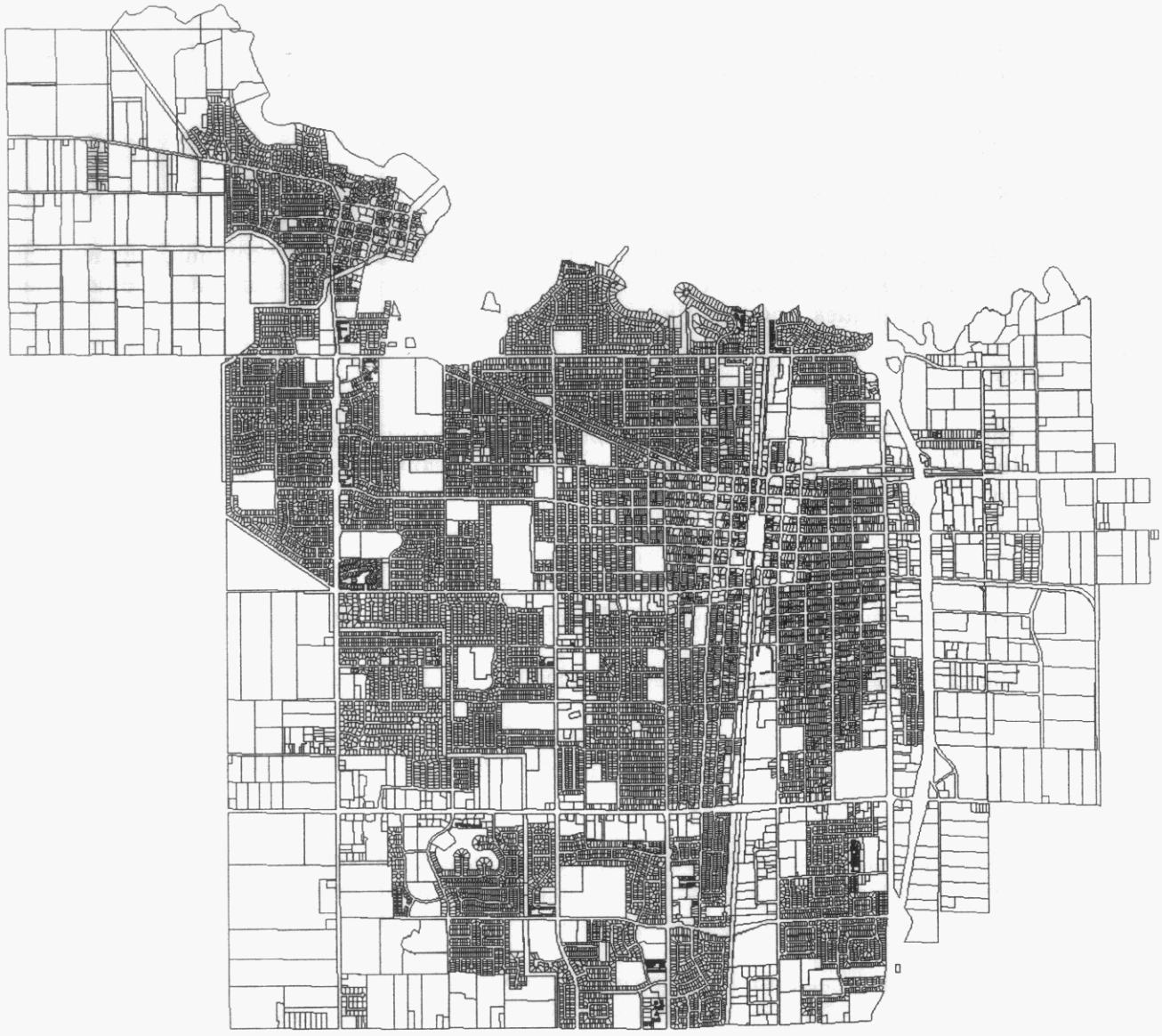
Project Location

Lodi is located in the northern San Joaquin Valley, along the Mokelumne River and between State Route 99 and Interstate 5. The city is approximately 10 square miles in area, with a Sphere of Influence that extends beyond the jurisdictional borders. The Project area includes the entire city limits and areas in the City's Sphere of Influence (see Figure 1).

Environmental Setting

The city is a mixture of urban uses, including residential, commercial, industrial, institutional, vacant, and agricultural uses. There are seven known habitat types within the Project area. Habitat types and uses vary across the city.

Figure 1
Project Area



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N
No scale.

Project Description

The Project is the adoption and implementation of the Housing Element Update. Many of the components of the Element involve programs whose operations are not expected to result in potential environmental effects.

Listed below are those components of the Housing Element Update that have potentially significant environmental effects. As previously noted, while the Housing Element Update in its entirety is the Project, for the purpose of environmental analysis the components described in this section - extracted from Section IV Strategy, Subsection B (Goals and Policies), and Section C (Implementation Programs) - constitute the Project that is the subject of this Program EIR. These changes are the basis for the environmental analysis contained in the Program EIR.

The numbers assigned to Housing Element Goals and Policies are as described in the Update.

GOALS AND POLICIES

GOAL A: To provide a range of housing types and densities for all economic segments of the community while emphasizing high quality development, homeownership opportunities, and the efficient use of land.

Policies

1. The City shall promote the development of a broad mix of housing types through the following mix of residential land uses: 65 percent low density, 10 percent medium density, and 25 percent high density.

2. The City shall regulate the number of housing units approved each year to maintain a population-based annual residential growth rate of 2.0 percent, consistent with the recommendations of the Mayor's Task Force and the growth management ordinance.

3. The City shall exempt senior citizen housing projects from the growth management ordinance.

4. The City shall exempt very low- and/or low-income housing units from the growth management ordinance if necessary to meet the City's share of regional housing needs, as required by state law.

9. The City shall grant density bonuses of at least 25 percent and/or other incentives in compliance with state law for projects that contain a minimum specified percentage of very low-income, low-income, or qualifying senior housing units.

10. The City shall seek to intersperse very low- and low-income housing units within new residential developments and shall ensure that such housing is visually indistinguishable from market-rate units.

12. The City shall promote the development of senior and other special needs housing near, and/or with convenient public transportation access to, neighborhood centers, governmental services, and commercial service centers.

13. The City shall encourage infill residential development within the existing City limits and compact development patterns in annexation areas to reduce public facility and service costs and the premature conversion of natural resource and agricultural lands.

Program 1: Zoning Ordinance Revisions

The City shall revise Title 17 of the Lodi Municipal Code (Zoning Ordinance) to reduce barriers to, and provide incentives for, the construction and conservation of a variety of housing types. Revisions to Title 17 will include the following:

f. Revision of off-street parking requirements (Chapter 17.60) to allow for less than two spaces per multifamily dwelling unit with fewer than two bedrooms when justified due to the characteristics of the occupants (such as seniors, persons with disabilities, or low-income single working adults) and/or the project location (such as along a public transit route or in the downtown area).

g. Revision of standards for second dwelling units to allow the conversion of accessory buildings to second units subject to compliance with all other zoning and parking standards, an appropriate minimum lot size for detached second units, and architectural compatibility with the main dwelling unit. The City will permit second dwelling units through an administrative permit process in compliance with state law (California Government Code section 65852.2).

h. Set specific density and design standards for single family homes in the R-MD, R-HD, and R-CP zones.

Program 2: Revise Growth Management Program

The City will revise its growth management program to:

a. Exempt housing units affordable to very low- or low-income households if such exemption is necessary to accommodate the City's share of regional housing construction needs as contained in the San Joaquin County Council of Governments housing allocation plan.

Program 3: Personal Security Standards

The City will continue to implement design standards applicable to all new residential projects with the objective of improving the personal security of residents and discouraging criminal activity. Design standards will address issues such as the placement of landscaping, accessory buildings, and accessory structures in a manner that does not impede the City's ability to conduct neighborhood police patrols and observe potential criminal activity; lighting and other security measures for residents, and the use of materials that facilitate the removal of graffiti and/or increase resistance to vandalism.

Program 4: Land Inventory

The City shall prepare and maintain a current inventory of vacant, residentially zoned parcels and a list of approved residential projects, and shall make this information available to the public and developers, including information on underutilized sites within the downtown area with residential or mixed-use development potential. The City shall update the inventory and list at least annually. The City will promote the land inventory and the availability of each update through the City's web site, a notice at the Community Development Permit Counter, and a press release subsequent to each update.

To encourage the maximum efficient use of land within the current City limits, Lodi will also conduct a study of residential development potential on underutilized industrial and commercial sites along Cherokee Lane and the Union Pacific Railroad. Properties along these streets may be suitable for future residential development if sufficient land can be consolidated to make such development feasible. These areas are characterized by obsolete patterns of land development, older structures in substandard condition, odd-sized lots, and marginally viable commercial and industrial uses that would make properties ripe for redevelopment in the next five to ten years. If Lodi determines that residential development is feasible along these streets, the City will initiate a planning process with property owners (which may be a special area plan or a specific plan meeting state law requirements) to define specific properties suitable for residential or mixed-use development, appropriate development standards, and improvements needed to support residential development.

Program 6: Encourage Efficient Use of Land for Residential Development

The City will investigate incentive and regulatory tools to encourage efficient use of land designated or held in reserve for urban development within the existing Lodi Sphere of Influence to reduce the conversion of agricultural land to urban use. If determined to be feasible, the City will adopt one or more incentives or regulations. Examples of approaches the City will study and consider are:

- A requirement to mitigate the loss of Prime Farmland through the payment of a fee. Fees collected by the City will be used to foster agricultural production in the Lodi area. This program may fund marketing, research, land acquisition and other programs necessary to promote agricultural production. An option that the City may consider that would promote the production of affordable housing is to have this program tied to a sliding scale based on dwelling units per acre. If a development is at the Land Use Element mandated 65% Low Density/10% Medium Density/35% High Density, equivalent to 9.85 dwelling units per acre, then no fee would be collected, a higher density would be provided with a credit while a lower density would be subject to the fee.

- The use of transferred development rights (TDRs) that can be applied to designated areas within the Sphere of Influence. The TDRs could possibly be combined with a density bonus program for agricultural preservation to increase the number of opportunities to use the TDRs. An option that the City of Lodi may consider is to designate sending and receiving areas. There is a potential that the sending area for the program could be approximately 0.25 miles south of Harney Lane to Armstrong Road in the area currently designated as Planned Residential Reserve by the Land Use Element of the General Plan. The receiving area for this program could then be designated to areas north of Harney Lane in the Planned Residential portion of the General Plan.

- Continue to promote the use of drainage basins as a transitional buffer land use between urban development and agricultural land uses to reduce the potential for conflicts.

- The use of transitional land use categories, such as residential estates, to provide a further buffer between more intense urban land uses and agricultural land uses.

Program 9: Annexation of Land to Accommodate Future Housing Needs

The City will work with property owners of approximately 600 acres outside the current City limits, but within Lodi's Sphere of Influence (SOI), to plan for, and annex the land to the City so that additional residential development opportunities can be provided to meet Lodi's future housing construction needs. The 600 acres are located between Harney Lane, Lower Sacramento Road, the Woodbridge Irrigation District canal, and the western SOI boundary. The City has initiated a specific planning process with property owners of approximately 300 acres to prepare these sites for annexation to the City. The development potential for the properties to be annexed is summarized in Table II-1B.

The City does not need to annex all 600 acres within the next three to five years to meet housing construction need given the backlog of unused housing allocations and available sites within the current City limits, but will initiate the process with property owners during the 2003 – 2008 period. Refer to Figures 2-3 and 2-4.

GOAL B: To encourage the maintenance, improvement, and rehabilitation of the City's existing housing stock and residential neighborhoods, particularly in the Eastside area.

Policies

2. The City shall prohibit the conversion of existing single-family units to multifamily units on residentially zoned properties less than 6,000 square feet in the Eastside area.

3. The City shall use available and appropriate state and federal funding programs and collaborate with nonprofit organizations to rehabilitate housing and improve older neighborhoods.

4. Housing rehabilitation efforts shall continue to be given high priority in the use of Community Development Block Grant (CDBG) funds, especially in the Eastside area.

5. The City shall support the revitalization of older neighborhoods by keeping streets and other municipal systems in good repair.

8. The City shall continue to enforce existing residential property maintenance standards.

Program 12: Housing Rehabilitation and Code Enforcement

The City will continue to combine code enforcement and housing rehabilitation assistance, targeted to the Eastside area. The City will promote its program through the Eastside Improvement Committee, a neighborhood organization that provides direct outreach to area residents and property owners, by providing information at the Community Development Department's public counter, and through a link to the program on the City's website. The City's Community Improvement Manager will work with the Committee to continue marketing the program to Eastside area residents and property owners.

Program 13: Property Maintenance and Management Standards

The City will continue to implement standards for private property maintenance (Chapter 15.30 of the Municipal Code) to 1) control or eliminate conditions that are detrimental to health, safety, and welfare; 2) preserve the quality of life and alleviate certain socioeconomic problems created by physical deterioration of property; and 3) protect property values and further certain aesthetic considerations for the general welfare of all residents of the City of Lodi.

Program 16: Mobilehome Park Preservation

Lodi will meet with mobilehome park owners to discuss their long-term goals for their properties and the feasibility of preserving these parks. Feasibility will be evaluated based on the condition of park infrastructure and buildings, the condition of mobile homes located in the park, parcel size, accessibility to services, and surrounding land uses. Several of the parks are small (fewer than 50 spaces) and may not be prime candidates for preservation. For those parks that are feasible to preserve, the City will:

- Assist property owners in accessing state and federal funds for park improvements by preparing funding requests, providing information to park owners on state and federal programs, and/or providing referrals to nonprofit organizations who can assist in preparing funding requests.

- Facilitate a sale to park residents of those mobile home parks the City has targeted for preservation and whose owners do not desire to maintain the present use. If necessary to facilitate a sale, the City will seek state and federal funding to assist residents in purchasing, improving, and managing their parks and/or seek the assistance of a nonprofit organization with experience in mobile home park sales and conversion to resident ownership and management.

- The City shall also require, as condition of approval of change of use, that mobilehome park owners who desire to close and/or convert their parks another use provide relocation or other assistance to mitigate the displacement of park residents, as required by California Government Code Section 65863.7. The City shall also require the park owner to provide evidence of resident notification of intent to close and/or convert the mobilehome park, as required by state law.

Program 17: Preservation of the Eastside Area (Housing Conservation Area)

The City will continue to target a portion of its annual CDBG allocation for public improvements in the Eastside area in support of its housing opportunities conservation through rehabilitation and neighborhood improvement activities. The City will also maintain the low density residential zoning (up to 7 dwelling units per acre) as a regulatory tool to preserve the character of the neighborhood, and encourage private investment in older homes while providing additional housing opportunities.

GOAL C: To ensure the provision of adequate public facilities and services to support existing and future residential development.

Policies

3. The City shall ensure that all necessary public facilities and services shall be available prior to

occupancy of residential units.

4. The City shall require that park and recreational acquisitions and improvements keep pace with residential development.

Program 19: Development Impact Fees and Improvement Requirements

The City will continue to collect a unified development impact fee to pay for off-site public facilities and services needed for residential development and require that residential developers continue to provide on-site infrastructure to serve their projects. The City shall continue to charge fees that reflect the actual cost of service provided to housing units anticipated by this element. Prior to the issuance of building permit, the City will require evidence that the developer has paid the required school impacts fees.

The City will review and adjust its fee formula for multifamily dwelling units in the medium and high density general plan land use designations so that the fee encourages the development of higher density affordable housing units while corresponding with the estimate public facility and service impact for the specific project being proposed. The review and adjustment is anticipated to result in a reduction of fees for some multifamily projects.

- **Water:** The City shall insure the integrity of water delivery service by constructing and operating wells.
- **Wastewater:** The City shall insure the provision adequate facilities and lands to effectively treat domestic wastewater while minimizing potential land use conflicts.
- **Streets:** The City shall insure that streets are designed and constructed that meet the intended development density while minimizing housing costs.
- **Transit:** The City shall insure the continued construction of transit facilities to facilitate service provision and lower the cost of living within the community. (Note: Transit Oriented Development concepts should probably be another program activity).
- **Parks:** See Program 22.
- **Emergency Services:** The City shall continue to insure that new housing developments are serviced in accordance with the goals and policies of the Safety Element.

Program 20: Growth Management Program

The City will continue to use its growth management program to ensure that the pace of development is consistent with the City's ability to provide public facilities and services and maintain minimum facility and service standards for the entire community. The City will contact other public facility and service providers annually during the housing unit allocation process to ensure that these agencies can serve the increased number of housing units to be allocated.

Program 22: Park and Recreation Facilities

The City will annually review its Park and Recreation impact fee to ensure that these fees, in combination with other funds that may be available to the City, will allow Lodi to acquire and improve sufficient parkland and provide recreation facilities according to the minimum standards contained in the General Plan Parks, Recreation, and Open Space Element.

GOAL E: To encourage residential energy efficiency and reduce residential energy use.

Policies

1. The City shall require the use of energy conservation features in the design and construction of all new residential structures and shall promote the use of energy conservation and weatherization features in existing homes.

2. The City shall require solar access in the design of all residential projects.

3. The City shall pursue residential land use and site planning policies that encourage reductions in residential energy consumption.

Program 27: Energy Efficiency and Weatherization Improvements for Older Homes

The City shall continue to permit energy conservation and weatherization improvements as eligible activities under the Lodi Housing Rehabilitation Program. The City will post and distribute information on currently available weatherization and energy conservation programs operated by the City, nonprofit organizations, and utility companies through the Lodi website, the Community Development Department public counter, the Lodi Public Library, the Loel Senior Center, and other public locations.

Program 28: Energy Conservation for New Homes

The City shall enforce state requirements for energy conservation, including Title 24 of the California Code or Regulations (state building code standards), in new residential projects and encourage residential developers to employ additional energy conservation measures in the design of new residential developments with respect to the following:

- Siting of buildings
- Landscaping
- Solar access
- Subdivision design

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CALIFORNIA DEPARTMENT OF CONSERVATION
NOP - LODI HE EIR
WILLIAMSON ACT PROGRAM
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SACRAMENTO CA 95814
916-322-1080

CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL
NOP - LODI HE EIR
1001 I STREET
SACRAMENTO CA 95814
916-324-1826

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD - CENTRAL VALLEY REG
NOP - LODI HE EIR
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916-255-3000

CALIFORNIA DEPARTMENT OF WATER RESOURCES
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SACRAMENTO CA 95814

CALIFORNIA WATER RESOURCES CONTROL BOARD
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916-341-5250

CALIFORNIA AIR RESOURCES BOARD
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2020 L STREET
SACRAMENTO CA 95814

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SCOTT BUTLER
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6 SOUTH EL DORADO STREET SUITE 400
STOCKTON CA 95202
209-468-3913

SAN JOAQUIN COUNTY - CDD
NOP - LODI HE EIR
1810 E HAZELTON AVE
STOCKTON CA 95205
209-468-3121

MIKE FINAN
US ARMY CORPS OF ENGINEERS
1325 J STREET
SACRAMENTO CA 95814
916-557-5324

HARRY MOSSMAN
US FISH AND WILDLIFE SERVICE
2800 COTTAGE WAY ROOM W-2605
SACRAMENTO CA 95825
916-414-6600

US DEPARTMENT OF AGRICULTURE
SOIL CONSERVATION SERVICE
1170 N LINCOLN AVENUE SUITE 110
DIXON CA 95620

SAN JOAQUIN LAFCO
1860 E HAZELTON AVENUE
STOCKTON CA 95205
209-468-3198

WES JOHNSON
SAN JOAQUIN COUNTY - PWD
1810 E HAZELTON AVE
STOCKTON CA 95205
209-953-7450

SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT
NOP – LODI HE EIR
4230 KIERNAN AVE STE 130
MODESTO CA 95356
209-557-6400

Lodi
Unified School District
Facility Planning Department

November 7, 2003

Mr. J. D. Hightower, City Planner
City of Lodi
P. O. Box 3006
Lodi, CA 95241-1910

Re: Notice of Preparation – Housing Element Update EIR

Dear Mr. Hightower:

The Lodi Unified School District respectfully requests that the EIR consider the impacts on school facilities relative to the following: new housing in areas where there are no schools, or school sites are not presently planned; in-fill housing and the impact on the school facilities serving that attendance area; changes in density either as part of the plan or as part of a bonus program.

Goal C, Policy 3 states that the City will ensure all necessary public facilities. Schools should be considered a necessary public facility and addressed accordingly.

LUSD recognizes that there is a statutorily-defined mitigation for new housing; however, the realities of whether or not there will be adequate facilities to serve the children from the new housing needs to be addressed.

Thank you for the opportunity to comment. The District's primary contact person will be Ms. Susan Ryan. She can be reached at 331-7213. Please do not hesitate to contact Susan or myself if you need information or if we may be of assistance on this project.

Sincerely,

Mary Joan (Mamie) Starr
Assistant Superintendent
Facilities and Planning

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CITY OF LODI

1305 E. Vine St.
Lodi, CA 95240

209-331-7218 • 209-953-8218
209-331-7229 Fax

DEPARTMENT OF CONSERVATION
STATE OF CALIFORNIA

CALIFORNIA CONSERVATION

DIVISION OF LAND RESOURCE PROTECTION

801 K STREET
SACRAMENTO
CALIFORNIA
95814

PHONE
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FAX
916/327-3430

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consrv.ca.gov

ARNOLD SCHWARZENEGGER
GOVERNOR

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November 20, 2003

Mr. J.D. Hightower, City Planner
Lodi Community Development Department
221 West Pine Street
Lodi, CA 95240

Dear Mr. Hightower:

Subject: Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Lodi Housing Element Update

The Department of Conservation's Division of Land Resource Protection (Division) monitors farmland conversion on a statewide basis and administers the California Land Conservation (Williamson) Act and other agricultural land conservation programs. The Division has reviewed the above NOP addressing a comprehensive update to the 1991 Housing Element. The Division recommends that, at a minimum, the following items be specifically addressed to document and treat the project impacts on agricultural land and land uses.

Agricultural Setting of the Project

The DEIR should describe the project setting in terms of the actual and potential agricultural productivity of the project area. The Division's San Joaquin County Important Farmland Map, which defines farmland according to soil attributes and land use, can be used for this purpose. In addition, we recommend including the following items of information to characterize the agricultural land resource setting of the project area.

- Current and past agricultural use of the project area. Include data on the types of crops grown, and crop yields and farmgate sales values.
- To help describe the full agricultural resource value of the soils on the site, we recommend the use of economic multipliers to assess the total contribution of the site's potential or actual agricultural production to the local, regional and state economies. State and Federal agencies such as the UC Cooperative Extension Service and USDA are sources of economic multipliers.

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Project Impacts on Agricultural Land

- Type, amount, and location of farmland conversion resulting directly and indirectly (growth-inducement) from the project.
- Impacts on current and future agricultural operations; e.g., land-use conflicts, increases in land values and taxes, vandalism, etc.
- Incremental project impacts leading to cumulatively considerable impacts on agricultural land. This would include impacts from the proposed project as well as impacts from past, current and probable future projects.

Impacts on agricultural resources may also be quantified and qualified by use of established thresholds of significance (California Code of Regulations Section 15064.7). The Division has developed a California version of the USDA Land Evaluation and Site Assessment (LESA) Model, a semi-quantitative rating system for establishing the environmental significance of project-specific impacts on farmland. The model may also be used to rate the relative value of alternative project sites. The LESA Model is available on the Division's website noted later in this letter.

Williamson Act Lands

A project is deemed to be of statewide, regional or area-wide significance if it will result in cancellation of a Williamson Act contract for a parcel of 100 or more acres [California Code of Regulations section 15206(b)(3)]. Since agricultural preserves and lands under Williamson Act contract exist in the proposed annexation area, the Department recommends that the following information be provided in the DEIR:

- A map detailing the location of agricultural preserves and contracted land within each preserve. The DEIR should also tabulate the number of Williamson Act acres, according to land type (e.g., prime or non-prime agricultural land), which could be impacted directly or indirectly by the project.
- A discussion of Williamson Act contracts that may be terminated upon implementation of the project. The DEIR should discuss the impacts that termination of Williamson Act contracts would have on nearby properties also under contract.

As a general rule, land can be withdrawn from Williamson Act contract only through the nine-year nonrenewal process. Immediate termination via cancellation is reserved for "extraordinary", unforeseen situations (See Sierra Club v. City of Hayward (1981) 28 Cal.3d 840, 852-855). The City or County of jurisdiction must approve a request for contract cancellation, and base that approval on specific findings that are supported by substantial evidence (Government Code section 51282). If Williamson Act contract cancellation is proposed, we recommend that a discussion of the findings be included in

the DEIR. Finally, the notice of the hearing to approve the tentative cancellation, and a copy of the landowner's petition, must be mailed to the Director of the Department of Conservation ten (10) working days prior to the hearing. (The notice should be mailed to Darryl Young, Director, Department of Conservation, c/o Division of Land Resource Protection, 801 K Street MS 18-01, Sacramento, CA 95814-3528.)

- If the project site is under Williamson Act contract, and any part of the site is to continue under contract after project completion, the DEIR should discuss the proposed uses for those lands. Uses of contracted land must meet compatibility standards identified in Government Code sections 51238 - 51238.3. Otherwise, contract termination (see paragraph above) must occur prior to the initiation of incompatible land uses.
- An agricultural preserve is a zone authorized by the Williamson Act, and established by the local government, to designate land qualified to be placed under the Act's 10-year contacts. Preserves are also intended to create a setting for contract-protected lands that is conducive to continuing agricultural use. Therefore, the uses of agricultural preserve land must be restricted by zoning or other means so as not to be incompatible with the agricultural use of contracted land within the preserve (Government Code section 51230). Therefore, the DEIR should also discuss any proposed general plan designation or zoning within agricultural preserves affected by the project.

Mitigation Measures and Alternatives

In addition to the land use incentive and regulatory tools discussed in the NOP, the Division recommends consideration of the purchase of agricultural conservation easements on land of at least equal quality and size as partial compensation for the direct loss of agricultural land, as well as for the mitigation of growth inducing and cumulative impacts on agricultural land. We highlight this measure because of its growing acceptance and use by lead agencies as mitigation under the California Environmental Quality Act.

Mitigation using conservation easements can be implemented by at least two alternative approaches: the outright purchase of conservation easements tied to the project, or via the donation of mitigation fees to a local, regional or statewide organization or agency, including land trusts and conservancies, whose purpose includes the purchase, holding and maintenance of agricultural conservation easements. Whatever the approach, the conversion of agricultural land should be deemed an impact of at least regional significance and the search for mitigation lands conducted regionally, and not limited strictly to lands within the Lodi area.

Information about conservation easements is available on the Division's website, or by contacting the Division at the address and phone number listed below. The Division's website address is:

http://www.conservation.ca.gov/DLRP/

The Department believes that the most effective approach to farmland conservation and impact mitigation is one that is integrated with general plan policies. For example, the measures suggested above could be most effectively applied as part of a comprehensive agricultural land conservation element in the City's general plan. Mitigation policies could then be applied systematically toward larger goals of sustaining an agricultural land resource base and economy. Within the context of a general plan mitigation strategy, other measures could be considered, such as the use of transfer of development credits, mitigation banking, and economic incentives for continuing agricultural uses.

Thank you for the opportunity to comment on the NOP. If you have questions on our comments, or require technical assistance or information on agricultural land conservation, please contact the Division at 801 K Street, MS 18-01, Sacramento, California 95814; or, phone (916) 324-0850.

Sincerely,

Charles Tyson for

Dennis J. O'Bryant
Acting Assistant Director

cc: San Joaquin County Resource Conservation District
1222 Monaco Court #23
Stockton, CA 95207