



CITY OF LODI COUNCIL COMMUNICATION

AGENDATITLE: Public Hearing to Receive Comments on the Lodi General Plan and Consider Adopting Resolution Certifying the Final Environmental Impact Report.

MEETING DATE: February 17, 2010

PREPARED BY: Community Development Director

RECOMMENDED ACTION:

- 1) Open public hearing to receive comments on the Lodi General Plan and Final Environmental impact Report.
- 2) Close public hearing.
- 3) Adopt Resolution certifying the Final Environmental Impact Report.

BACKGROUND INFORMATION: The City Council received a presentation on the Draft Environmental Impact Report (DEIR) and General Plan at the January 6th meeting. The City Council received one public comment at the meeting from Mr. Bruce Fry regarding land use designations for property south of Harney Lane. Subsequent to the meeting, the public comment period closed for comments related to the DEIR. We received 44 comments from a combination of citizens and public agencies during the 45-day review period. The attached Final Environmental Impact Report (FEIR) represents the responses to those comments and proposed revisions to the DEIR.

If the City Council is satisfied with the document, we have provided a Resolution for your consideration to certify the FEIR. This Resolution contains the required findings as well as Statements of Overriding Consideration which the City Council is not being asked to adopt the General Plan at this time. We are waiting for comments from the San Joaquin Valley Air Pollution Control District. Additionally, we would like to accept any further comment and direction from the City Council in order to prepare the Final Plan which will contain all of the edits and revisions from the environmental process as well as public comment received to date. I anticipate having this work completed for the City Council meeting on April 7, 2010.

As with all EIR's, this document assesses the potential impacts the proposed General Plan may have on specific environmental topics. This has been done on a program level rather than the detail that the City Council may be used to with specific development projects. As a result of the public comment on the DEIR, there are revisions/edits that are being proposed in this FEIR as follows:


Blair King, City Manager

Revisions to the Draft EIR

Section	Page	Correction
3.2	3.2-15	The second sentence of the first paragraph is amended as follows: Table 3.2-4 presents the existing and projected (2030) traffic volumes and LOS for individual roadway segments throughout the city.
3.2	3.2-21	Add paragraph following Table 3.2-4: <u>Future (2030) traffic volumes and LOS values were assessed for two additional north-south segments, between Harnev Lane and Armstrong Road:</u> <ul style="list-style-type: none"> • <u>Lower Sacramento Rd: 24,500. LOS B</u> • <u>West Lane: 28,500. LOS D</u> <u>Existing daily traffic volumes and LOS were not assessed. These additional segments do not alter the conclusions presented in the Draft EIR regarding significant environmental impacts and therefore do not trigger recirculation</u>
3.2	3.2-22	The following text is added after the first paragraph of the Impact Methodology section. The referenced Table 3.2-4A may be found at this end of this chapter. <u>The traffic demand forecasting model summarizes land uses, street network, travel characteristics, and other key factors. Using these data, the model performs a series of calculations to determine the amount of trips generated, where each trip begins and ends, and the route taken by the trip. Trip generation is estimated by land use, using factors, as described in a new table, Table 3.2-4A. These trips are aggregated to determine daily traffic volumes and total vehicle trips in addition to other outcomes.</u>
3.7	3.7-1	The Comanche <u>Camanche</u> Reservoir is located on the Mokelumne River approximately 20 miles northeast of the Planning Area (City of Lodi, 1988; Department of Water Resources, 2006).
3.7-4		A second map is added to this page to show groundwater basins. This new map, Figure 7.2-1A is amended at the end of this section.
3.13-15		The following text is added after the third paragraph under the heading "Policies and Mitigations:" <u>Third, the City's Water Conservation Ordinance promotes water conservation by restricting water of landscaping to certain days and hours. (For example, odd numbered street addresses may only water landscaping on Wednesdays, Fridays and Sundays, and watering between May 1 and September 30, between 10AM and 6PM is prohibited.) The ordinance also specifies enforcement procedures, including sanctions for non-compliance. Most importantly, in relation to dry year scenarios, the ordinance also permits the City to place additional restrictions on water use in an emergency situation to manage water pressure and/or supply demands.</u>

Significant and Unavoidable Impacts

Pursuant to the California Environmental Quality Act (CEQA), EIR's are required to provide a summary of those impacts which are considered significant and unavoidable. This is Section 5.3 of the DEIR and summarized in the table below. As the City Council is aware, in order for the project (in this case the General Plan) to move forward, the Resolution to certify the FEIR must contain reasons why the benefits of the General Plan outweigh the significant unavoidable impacts. These are considered Statements of Overriding Considerations.

Summary of Significant and Unavoidable Impacts

#	Impact	Proposed General Policies that Reduce the Impact	Significance	Mitigation
3.2	Traffic and Circulation			
3.2- I	The proposed General Plan would result in a substantial increase in vehicular traffic that would cause certain facilities to exceed level of service standards established by the governing agency.	T-G I, T-PI, T-P2, T-P3, T-P4, T-PNEW, T-NEW, T-P8, T-NEW, T-P9, T-PI0, T-P I3, T-PI4, T-PI5, T-PI6, T-PI7, T-PI8, T-PI9, T-P20, T-P22, T-P24, T-P25, T-P27, T-P-28, T-P29, T-P43, T-P44, T-P45	Significant and Unavoidable	No feasible mitigation is currently available.
3.2-2	The proposed General Plan may adversely affect emergency access.	T-PI, T-P2, T-P8, T-P9, T-P I0	Significant and Unavoidable	No mitigation measures are feasible.
3.2-3	The proposed General Plan may conflict with adopted policies, plans, or programs supporting alternative transportation modes.	T-G I, T-P8, T-P9, T-PI0, T-PI3, T-PI4, T-PI5, T-PI6, T-PI7, T-PI8, T-PI9, T-P20, T-P22, T-P24, T-P25, T-P27, T-P28, T-P29, T-P43, T-P44, T-P45, T-G2, T-G3, T-G4, T-G5, T-PI I, T-PI2, T-P21, T-P23, T-P26, T-P30, T-P38, T-P39	Significant and Unavoidable	No feasible mitigation is currently available.
3.3	Agriculture and Soil Resources			
3.3- I	Buildout of the proposed General Plan would convert substantial amounts of Important Farmland to non-agricultural use.	C-G I, C-G2, C-PI, C-P2, C-P3, C-P4, C-P5, C-P6, C-P7, C-P8, GM-GI, GM-P2	Significant and Unavoidable	Not directly mitigable aside from preventing development altogether
3.6	Climate Change and Greenhouse Gases			
3.6- I	Implementation of the proposed General Plan would increase total carbon dioxide equivalent emissions in Lodi, compared to existing conditions.	LU-G I, LU-G2, LU-G3, LU-GI, LU-G4, LU-P2, LU-P3, LU-P6, LU-PI8, LU-P25, LU-P26, LU-P27, GM-GI, GM-G2, GM-G3, GM-PI, GM-P2, GM-P3, GM-P4, GM-P6, CD-G I, CD-PI, CD-G-4, CD-G-5, CD-P3 I, CD-P21, CD-P24, T-G2, T-G4, T-PI3, T-PI4, T-PI5, T-PI6, T-PI7, T-PI8, T-PI9, T-P23, T-P25, T-P28, T-P29, GM-PI I, GM-PI3, GM-PI4, GM-PI5, CD-G8, CD-G9, CD-P38, CD-P39, CD-P40, CD-P32, C-P39, C-PNEW, C-PNEW, C-P37, C-P38, C-P40, C-P42, GM-PI9, CD-PI5, CD-PI6, CD-PI9, C-P43, C-P44, C-P45, C-P4I, C-G9, C-GI0, C-P36, T-G8, T-P43, T-P44, T-P45, GM-PI7, GM-PI8	Overall Significant Cumulative Impact, Project Contribution Cumulatively Considerable	No feasible mitigation measures are currently available

3.8	Air Quality			
3.8-1	Implementation of the proposed General Plan could result in a cumulatively considerable net increase of criteria pollutants which may conflict with or violate an applicable air quality plan, air quality standard or contribute substantially to an existing or projected air quality violation.	C-P46, C-P47, C-P48, C-P49, C-P50, C-P51, C-P52, C-P53, C-P54, C-P55, C-P56, C-P57, T-G4, T-G5, T-P14, T-P15, T-P16, T-P17, T-P18, T-P19, T-P20, T-P21, T-P22, T-P23, T-P24, T-P25, T-P26, T-P27, T-P28, T-P29, T-P38, T-P39, T-P43, T-P44, T-P45	Significant and Unavoidable	No feasible mitigation measures are currently available.
3.8-2	Buildout of the proposed General Plan could expose sensitive receptors to substantial pollutant concentrations.	C-P46, C-P47, C-P48, C-P49, C-P50, C-P51, C-P52, C-P53, C-P54, C-P55, C-P56, C-P57, T-G4, T-G5, T-P14, T-P15, T-P16, T-P17, T-P18, T-P19, T-P20, T-P21, T-P22, T-P23, T-P24, T-P25, T-P26, T-P27, T-P28, T-P29, T-P38, T-P39, T-P43, T-P44, T-P45	Significant and Unavoidable	No feasible mitigation measures are currently available.
3.1	Noise			
3.1-1	Implementation of the proposed General Plan could result in a substantial permanent increase in ambient noise levels.	N-P1, N-P2, N-P3, N-P4, N-P5, N-P6, N-P7, N-P8, N-P9, N-P10, N-PNEW	Significant and Unavoidable	No feasible mitigation measures are currently available.

FISCAL IMPACT: N/A

FUNDING AVAILABLE: N/A



 Konradt Bartlam
 Community Development Director

KB/kjc
 Attachments:
 Final Environmental Impact Report, February, 2010
 Draft Resolution



LODI GENERAL PLAN FINAL ENVIRONMENTAL IMPACT REPORT

SCH# 2009022075

CITY OF LODI FEBRUARY 2010

LODI GENERAL PLAN
FINAL ENVIRONMENTAL IMPACT REPORT
SCH# 2009022075

CITY OF LODI FEBRUARY 2010

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I Introduction

This Program Final Environmental Impact Report (EIR) has been prepared by the City of Lodi (City) in accordance with the California Environmental Quality Act (CEQA). The City is the lead agency responsible for ensuring that the proposed Lodi General Plan (General Plan) complies with CEQA.

PURPOSE

The Final EIR includes the Draft EIR and this document, which includes Comments on and Responses to Comments on the Draft EIR, and minor corrections and clarifications to the Draft EIR. It is intended to disclose to City decision makers, responsible agencies, organizations, and the general public, the potential impacts of implementing the proposed General Plan. This program level analysis addresses potential impacts of activities associated with implementation of the General Plan, which are described in Chapter 2: Project Description, of the Draft EIR.

The primary purpose of the Final EIR is to revise and refine the environmental analysis in the Draft EIR, published November 25, 2009, in response to comments received during the 45-day public review period. The review period for the Draft EIR (State Clearinghouse No. 2006022008) was from November 25, 2009 to January 11, 2010. This document, combined with the Draft EIR, constitutes the Final EIR on the project. This Final EIR amends and incorporates by reference the Draft EIR, which is available as a separately-bound document from the City of Lodi Community Development Department, 221 W. Pine Street, in Lodi, and also available on the Internet at http://www.lodi.gov/community_development/general_plan/reports.htm.

The Draft EIR contains some impacts that are significant and unavoidable despite extensive mitigating policies, specifically impacts to traffic and circulation, agricultural resources, climate change and greenhouse gases, air quality, and noise. Other potentially significant impacts can be avoided or reduced to levels that are not significant through implementation of the policies identified in the Draft EIR.

ORGANIZATION

This document contains the following components:

- Chapter 2 lists all of the agencies and individuals that submitted written comments on the Draft EIR; reproduces all comments and provides a unique number for each EIR comment in the page margin.
- Chapter 3 provides responses to comments, numbered, and in order according to the comments in Chapter 2.
- Chapter 4 lists revisions to the Draft EIR by chapter and page, in the same order as the revisions would appear in the Draft EIR. Additional tables and graphics appear at the end of this chapter, also in the same order that they would appear in the Draft EIR.

PROCESS

Upon publication of the Final EIR, the City Council will hold a public hearing to certify the EIR and to consider adoption of the proposed General Plan. The City Council will determine the adequacy of the Final EIR, and, if determined adequate, will certify the document as compliant with CEQA. For impacts identified in the EIR that cannot be reduced to a level that is less than significant, the City must make findings and prepare a Statement of Overriding Considerations for approval of the Project if specific social, economic, or other factors justify the proposed Project's unavoidable adverse environmental effects.

If the City decides to approve the proposed Project for which the Final EIR has been prepared, it will issue a Notice of Determination.

Copies of the Final EIR have been provided to agencies and other parties that commented on the Draft EIR or have requested the Final EIR. The Final EIR is also available at the City of Lodi Community Development Department, 221 W. Pine Street, in Lodi and the City's website at: http://www.lodi.gov/community_development/general_plan/reports.htm.

2 Comments on the Draft EIR

This chapter contains copies of the comment letters and oral comments received on the Draft EIR of the proposed General Plan. A total of 44 comments were received during the 45-day comment period. Additionally, oral comments were heard at a Planning Commission public hearing on the Draft EIR, on December 9, 2009. Each comment letter is numbered, and each individual comment is assigned a number in the page margin. Responses to each comment are provided in Chapter 3 of this document. Please note that only comments on the Draft EIR are addressed in this Final EIR. Where comments are on the merits of the proposed General Plan rather than on the Draft EIR, this is noted in the response. Where appropriate, the information and/or revisions suggested in these comment letters have been incorporated into the Final EIR. These revisions are included in Chapter 4 of this document.

Comments Received on the Proposed Lodi General Plan

Letter #	Date	Agency/Organization	Commenter
<i>Public Agencies (Federal, State Regional, Local)</i>			
A1	December 14, 2009	Central Valley Flood Protection	James Herota
A2	January 6, 2010	Department of Transportation	Tom Dumas
A3	January 8, 2010	Public Utilities Commission	Moses Stites
A4	January 11, 2010	City of Stockton	Kevin O'Rourke
A5	January 11, 2010	San Joaquin Council of Governments	Dana Cowell
A6	January 11, 2010	San Joaquin Council of Governments	Dana Cowell
A7	January 11, 2010	San Joaquin County: Community Development Department	Kerry Sullivan
<i>Organizations/Individuals</i>			
B1	December 9, 2009		Jane Wagner-Tyack
B2	January 8, 2010	Herum/Crabtree Attorneys	Steven A. Herum
B3			Bruce Fry
B4	January 10, 2010		Joseph L. Manassero
B5	January 10, 2010		Catherine T. Manassero
B6	January 10, 2010		Michael J. Manassero
B7	January 10, 2010		Patricia M. Manassero
B8	January 10, 2010		Jack D. Ward
B9	January 10, 2010		Joseph Kaehler
B10	January 10, 2010		Illegible name
B11	January 10, 2010		John Kaehler
B12	January 10, 2010		Illegible name
B13	January 10, 2010		Grace Puccinelli
B14	January 10, 2010		Illegible name

Chapter 2: Comments on the DEIR

Comments Received on the Proposed Lodi General Plan

<i>Letter #</i>	<i>Date</i>	<i>Agency/Organization</i>	<i>Commenter</i>
B15	January 10, 2010		Illegible name
B16	January 10, 2010		Douglass Manassero
B17	January 10, 2010		Illegible name
B18	January 10, 2010		Illegible name
B19	January 10, 2010		Illegible name
B20	January 10, 2010		Illegible name
B21	January 10, 2010		Illegible name
B22	January 10, 2010		Steve J. Borra Jr.
B23	January 10, 2010		Beverly Borra
B24	January 10, 2010		Lucille Borra
B25	January 10, 2010		Gary Tsutsumi
B26	January 10, 2010		Illegible name
B27	January 10, 2010		Illegible name
B28	January 10, 2010		Illegible name
B29	January 10, 2010		Illegible name
B30	January 10, 2010		Thomas Gooding
B31	January 10, 2010		Louise Gooding
B32	January 10, 2010		Illegible name
B33	January 10, 2010	Diede Construction, Inc	Mike Mason
B34	January 10, 2010	Diede Construction, Inc	Jake Diede
B35	January 10, 2010	Diede Construction, Inc	Steven L. Diede
B36	January 10, 2010	Diede Construction, Inc	Izzac Ramirez
B37	January 10, 2010	Diede Construction, Inc	Robert Lee
<i>Oral Testimony (C)</i>			
C1	December 9, 2009	Planning Commission Hearing	

CENTRAL VALLEY FLOOD PROTECTION BOARD

3310 El Camino Ave., Rm. LL40
SACRAMENTO, CA 95821
(916) 574-0609 FAX: (916) 574-0682
PERMITS: (916) 574-0685 FAX: (916) 574-0682

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DEC 15 2009

COMMUNITY DEVELOPMENT DEPT
CITY OF LODI

December 14, 2009

Konradt Bartlam
City of Lodi
Planning Division
221 West Pine Street
Lodi, CA 95241

Dear Mr. Bartlam:

State Clearinghouse (SCH) Number: 2009022075
City of Lodi General Plan Update
EIR - Draft EIR

Staff for the Central Valley Flood Protection Board has reviewed the subject document and provides the following comments:

The proposed project is located within the jurisdiction of the Central Valley Flood Protection Board (Formerly known as The Reclamation Board). The Board is required to enforce standards for the construction, maintenance and protection of adopted flood control plans that will protect public lands from floods. The jurisdiction of the Board includes the Central Valley, including all tributaries and distributaries of the Sacramento River and the San Joaquin River, and designated floodways (Title 23 California Code of Regulations (CCR), Section 2).

A1-1

A Board permit is required prior to starting the work within the Board's jurisdiction for the following:

- The placement, construction, reconstruction, removal, or abandonment of any landscaping, culvert, bridge, conduit, fence, projection, fill, embankment, building, structure, obstruction, encroachment, excavation, the planting, or removal of vegetation, and any repair or maintenance that involves cutting into the levee (CCR Section 6);
- Existing structures that predate permitting or where it is necessary to establish the conditions normally imposed by permitting. The circumstances include those where responsibility for the encroachment has not been clearly established or ownership and use have been revised (CCR Section 6);
- Vegetation plantings will require the submission of detailed design drawings; identification of vegetation type; plant and tree names (i.e. common name and scientific name); total number of each type of plant and tree; planting spacing and irrigation method that will be within the project area; a complete vegetative management plan for maintenance to prevent the interference with flood control, levee maintenance, inspection and flood fight procedures (Title 23, California Code of Regulations CCR Section 131).

December 14, 2009
Konradt Bartlam
Page 2 of 2

The permit application and Title 23 CCR can be found on the Central Valley Flood Protection Board's website at <http://www.cvfpb.ca.gov/>. Contact your local, federal and state agencies, as other permits may apply.

If you have any questions please contact me at (916) 574-0651 or by email jherota@water.ca.gov.

Sincerely,



James Herota
Staff Environmental Scientist
Floodway Protection Section

cc:

Governor's Office of Planning and Research
State Clearinghouse
1400 Tenth Street, Room 121
Sacramento, CA 95814

DEPARTMENT OF TRANSPORTATION
 DISTRICT 10
 P.O. BOX 2048, STOCKTON, CA 95201
 (1976 E. DR. MARTIN LUTHER KING JR. BLVD., 95205
 PHONE (209) 948-7943
 FAX (209) 948-3670
 TTY 711

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JAN 11 2010

COMMUNITY DEVELOPMENT DEPT
CITY OF LODI

*Flex your power!
 Be energy efficient!*

January 6, 2010

10-SJ-Variou
 City of Lodi
 General Plan Update
 SCH 2009022075

Mr. Rad Bartham
 City of Lodi
 Planning Division
 221 West Pine Street
 Lodi, CA 95241

Dear Mr. Bartham:

The California Department of Transportation (Department) appreciates the opportunity to have reviewed the Draft Environmental Impact Report (DEIR) for the City of Lodi General Plan. The Department has the following comments:

Traffic Operations Comments

1. Refer to Page 3.2-25, Proposed General Plan Policies that Reduce the Impact Section T-NEW. This section discusses applying a standard of Level of Service (LOS) E during peak hour conditions on all streets in the City's jurisdiction. Please remember State Route 12 (Kettleman Lane) is a Caltrans State Highway and the minimum LOS standard is D. A2-1
2. Refer to page 3.2-9, *Trucking*. We would like the City of Lodi STAA Truck Routes Map included in the Lodi General Plan. A2-2
3. In order to maintain the integrity of the State Highway System (SHS), proposed developments with potential impact to the SHS will need to be reviewed by Caltrans. Projects impacting the State Highway System may require a Traffic Impact Study (TIS) in order to determine the operational mitigation measures necessary to remediate the identified transportation impacts. The TIS will need to be completed per Caltrans' Guide for the Preparation of Traffic Impact Studies, December 2002. The TIS should include all approved and pending projects within the vicinity. A2-3

A2-4

4. Please remember, the City of Lodi General Plan should be consistent with Caltrans' Ramp Metering, HOV, and Park-and-Ride Plan as a means to further reduce traffic congestion.

Travel Forecasting Comments:

A2-5

1. **Table ES-1: General Plan Population, and Employment Potential** - The housing, population and employment in the General Plan appear to be inconsistent with SJCOG underlying data. The date in the DEIR for the proposed City of Lodi General Plan Update is higher than SJCOG's underlying data. Regardless of which alternative is chosen, Caltrans recommends the City of Lodi work with SJCOG to update the regional land use projections in the next RTP by incorporating the higher numbers in the Lodi General Plan Update. This will ensure approved transportation projects with regional impacts can be accurately identified and properly mitigated.

A2-6

2. **Table 3.1-2: Housing Units, by Type** - Please clarify what type of units "2 to 4 units" and "5 or More Units" are so that we can determine the trip generation.

A2-7

3. **Table 3.2-1: Average Daily Traffic Volumes and LOS Thresholds** – Please specify what highways under "Facility Type" and amount of truck volumes under "Daily Volume".

A2-8

4. **Table 3.2-3: Citywide Transportation Analysis Results for the Proposed General Plan** – Please explain how "Total Vehicle Trips" were computed and provide trip generation tables.

A2-9

5. **Table 3.2-4: Existing and Proposed General Plan Average Daily Traffic Volumes and Levels of Service** – Please explain how the "Proposed General Plan Daily Traffic Volume" was forecasted and to what year. The DEIR shows existing daily traffic volumes for SR-99 NB/SB Eight Mile Rd. to Armstrong to be 53,000 and the 2008 Caltrans ADT volumes at this same location show 62,000. Please explain this substantial difference.

A2-10

6. The Department requests that the DEIR address the potential traffic impacts of the City of Lodi's growth on SR 99 and Interstate 5. It is recommended that a traffic mitigation "fair share" fee program be considered with the adopting of the General Plan to address Lodi's growth impacts on the State Highway Transportation System. These projects should be clearly identified as funded through the impact fee program in the DEIR. For example, not mentioned in the DEIR are SR-99

New Capacity projects. The widening of SJ99 four to six lanes from Junction 12 east to the Sacramento County line. The SJ-99 four to six lane widening from north of Harney Lane to junction Highway 12 east was also not mentioned.

7. **Air Quality** – Please send the DEIR to the San Joaquin Valley Air Pollution Control District (SJVAPCD) for review.

A2-11

System & Advanced Planning Comments:

1. In addition to multimodal and Travel Demand Modeling measures to reduce traffic, please consider other methods to maintain and enhance level of service (LOS) standards on State Routes through Lodi such as access management, site design, and on-site development circulation.

A2-12

2. In order to accommodate future growth in the city and surrounding areas, please remember to insure and preserve adequate right of way for future State Route improvements to the mainline, ramps and bridges, light rail, and off-road bike, pedestrian trails.

A2-13

3. The following items were left out of the City of Lodi General Plan Update, but should be included in future General Plan Updates:

A2-14

- Provision of a truck route map in the document which includes how plans are being made to link major industrial centers and shopping centers to rail line distribution centers, and STAA truck routes and establish where there are all significant STAA truck route gaps. Delineate all gaps on a map, and establish methodologies including funding as to how these gaps will be addressed over a specific time period.
- Include discussion of what efforts are being made with adjacent jurisdictions to provide connectivity for larger sized or STAA trucks.

<Mr. Rad Barham>

<January 11, 2010

<Page 4

Thank you for continuing to coordinate and consult with the Department to identify and address potential cumulative transportation impacts that may occur within this geographical location. This will assist us in ensuring that traffic safety and quality standards are maintained for the traveling public on existing and future State transportation facilities.

Sincerely,

for 
TOM DUMAS, Chief
Office of Metropolitan Planning

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



January 8, 2010

Konradt Bartlam
City of Lodi
221 W Pine Street
Lodi, CA 95240

Re: Notice of Completion-Draft Environmental Impact Report (DEIR)
SCH # 2009022075-City of Lodi General Plan Update

RECEIVED
JAN 11 2010
COMMUNITY DEVELOPMENT DEPT
CITY OF LODI

Dear Mr. Bartlam:

As the state agency responsible for rail safety within California, the California Public Utilities Commission (CPUC or Commission) recommends that development projects proposed near rail corridors be planned with the safety of these corridors in mind. New developments and improvements to existing facilities may increase vehicular traffic volumes, not only on streets and at intersections, but also at at-grade highway-rail crossings. In addition, projects may increase pedestrian traffic at crossings, and elsewhere along rail corridor rights-of-way. Working with CPUC staff early in project planning will help project proponents, agency staff, and other reviewers to identify potential project impacts and appropriate mitigation measures, and thereby improve the safety of motorists, pedestrians, railroad personnel, and railroad passengers.

We concur with the City of Lodi in addressing rail safety in the DEIR;

On pages 2-16-17, Community Design and Livability, Transportation, Improve railroad crossings to minimize safety hazards and allow for additional capacity improvements.

Page 2-19, Support grade separated railroad crossings, where feasible and other appropriate measures adjacent to railroad tracks to ensure the safety of the community.

Page 3-2-22, Traffic and Circulation section under Significance criteria, implementation of the proposed General Plan would have a potentially significant transportation/traffic if it would; Conflict with adopted policies, plans or programs supporting alternative transportation modes, such as rail transit, buses, bicycles, vanpools and walking.

We recommend that the City incorporate any improvements to the at-grade railroad crossings and rail corridors into the existing City mitigation fee program to ensure that improvements get programmed with an actual funding mechanism. This will also address project specific and cumulative impacts of new development projects to rail facilities. Otherwise, the burden could eventually fall on one project or the City, depending on the level of significance and or safety concerns. This could potentially affect the entitlement process for future development projects according to CEQA.

A3-1

Konradt Bartlam
City of Lodi
SCH # 2009022075
January 8, 2010
Page 2 of 2

Thank you for your consideration of these comments. If you have any questions in this matter, please contact me at (415) 713-0092 or email at ms2@cpuc.ca.gov.

Sincerely,

A handwritten signature in cursive script that reads "Moses Stites".

Moses Stites
Rail Corridor Safety Specialist
Consumer Protection and Safety Division
Rail Transit and Crossings Branch
515 L Street, Suite 1119
Sacramento, CA 95814



CITY OF STOCKTON

OFFICE OF THE CITY MANAGER

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www.stocktongov.com

January 11, 2010

Rad Bartlam
Community Development Director
City of Lodi
P. O. Box 3006
Lodi, CA 95241

CITY OF STOCKTON COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE CITY OF LODI GENERAL PLAN

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report (DEIR) for the above-noted General Plan. Staff respectfully offers the following comments:

1. Land Use Policies: To ensure that future growth will proceed in an orderly manner, Lodi has proposed to designate an Urban Reserve Boundary (URB) beyond the existing City limits shown on the Land Use Diagram. We recommend that the following land use polices or measures for the URB be included in the General Plan and the DEIR:
 - (1) that Lodi expands the URB only when applicable General Plan policies can be met and appropriate services and adequate infrastructure can be provided; and
 - (2) future urban development in the URB be in conformance with Lodi's adopted master utility and circulation plans.
2. Land Use Policies, Growth Management and Infrastructure: Stockton's adopted General Plan has designated an open space/agricultural land use along the northern boundary as a buffer zone between the City of Stockton and the City of Lodi. We recommend that Lodi also take into consideration the same land use designation up to its southern Sphere of Influence boundary in order to provide a more meaningful and effective greenbelt buffer.
3. The DEIR indicates that the Armstrong Road Agricultural Cluster Study Area will be designated with agricultural, open space or large-lot rural residential use to ensure maintenance of this area as greenbelt. For consistency purposes, the proposed study area on the land use diagram should reflect this policy and show a future land use designation in that area.

A4-1

A4-2

A4-3

Comments on the DEIR for City of Lodi General Plan

January 11, 2010

Page 2 of 2

A4-4

4. Traffic and Circulation: It appears that the traffic analysis did not consider potential impacts to arterial roadways including Lower Sacramento Road and West Lane south of Harney Lane, which is within the proposed Lodi General Plan boundaries and should be to Armstrong Road.

A4-5

5. Public Facilities: In order to provide protection to the public through effective fire protection services and the incorporation of the fire safety features in new and existing development, the General Plan and the DEIR should include a fire response time which may be used to determine future fire station needs under Growth Management and Infrastructure Element Policies.

Should you have any questions regarding this matter, please do not hesitate to contact me at 937-8212 or Community Development Director Mike Niblock at 937-8444.



KEVIN O'ROURKE
INTERIM CITY MANAGER

LM:mmn:sis

emc: Mayor and City Council
Ren Nosky, City Attorney
Guy Petzold, Deputy City Attorney
Michael M. Niblock, Community Development Director
Gregg S. Meissner, Deputy Director/Community Development Department-
Planning and Engineering Services Division
Mark J. Madison, Director of Municipal Utilities Department
Robert Murdoch, Interim Director of Public Works Department
Matt Duaine, Fire Prevention Chief
Blair Ullring, Police Chief of Police Department
David Stagnaro, AICP, Planning Manager
Michael McDowell, Planning Manager
Jenny Liaw, Senior Planner



SAN JOAQUIN COUNCIL OF GOVERNMENTS

555 E. Weber Avenue • Stockton, California 95202

209.235.0600 • 209.235.0438(fax)

www.sjcog.org

January 11, 2010

Larry Hansen
CHAIR

Ann Johnston
VICE CHAIR

Andrew T. Chesley
EXECUTIVE DIRECTOR

Mr Rad Bartlam
Community Development Director
City of Lodi
P.O. Box 3006, Lodi, CA 95241

Dear Mr Bartlam.

**Re: ALUC Review - City of Lodi's Draft Environmental Impact Report (DEIR)
Lodi General Plan: SCH# 2009022075**

Member Agencies:
CITIES OF
ESCALON,
LATHROP,
LODI,
MANTECA,
RIPON,
STOCKTON,
TRACY,
AND
THE COUNTY OF
SAN JOAQUIN

Thank you for the opportunity to comment on this important document. The San Joaquin Council of Governments, in carrying out the duties of the County's Airport Land Use Commission (ALUC), has reviewed the above-referenced document with respect to safety and regional aviation land use planning pursuant to the California Environmental Quality Act (CEQA). The following comments are offered on behalf of the ALUC:

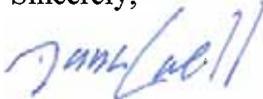
- 1) As discussed with the DEIR, there are two public use airports that are located within the planning boundaries of Lodi's General Plan; Lodi Airpark and Kingdon Executive Airport. The 2009 Airport Land Use Compatibility Plan (ALUCP) gives detailed information on the existing and future operations of these two airports. Also within the ALUCP, zones of compatible land uses have been established surrounding each respective airport's "Area of Influence" (AIA). Special commendation is noted for including the recently approved compatibility map in the DEIR and incorporating a discussion within the Land Use, Noise, and Hazards sections. Although not enough information has been submitted to the ALUC for detailed consistency analysis of the future land uses as they relate to the compatibility zones, the general land use patterns appear to be consistent.
- 2) Since neither of the airports AIA's fall within Lodi's City limits, it is the ALUC's understanding that the County of San Joaquin will be the lead agency for any future projects that fall outside of the city limits but within Lodi's

ALUC Comments – Lodi GP
January 11, 2010

Sphere of Influence. However there may be exceptions to this for certain projects resulting in Lodi taking the responsibility as the lead agency. In either circumstance, the ALUC requires notification from the lead agency at the time of application. Upon notification and submittal of required project information, ALUC staff will make the determination the project's consistency with the most recent adopted Compatibility Zones.

Thank you for the opportunity to review and comment on Lodi's General Plan. If you have any questions please call the ALUC's staff planner, Laura Brunn, at (209) 235-0579.

Sincerely,



DANA COWELL
Deputy Director



SAN JOAQUIN COUNCIL OF GOVERNMENTS

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January 11, 2010

Larry Hansen
CHAIR

Ann Johnston
VICE CHAIR

Andrew T. Chesley
EXECUTIVE DIRECTOR

Mr. Rad Bartlam
Community Development Director
City of Lodi
P.O. Box 3006, Lodi CA 95241

Dear Mr. Bartlam.

**Re: CMA Review - City of Lodi's Draft Environmental Impact Report (DEIR)
Lodi General Plan: SCH# 2009022075**

Thank you for the opportunity to comment on this important document. As the County's designated Congestion Management Agency, the San Joaquin Council of Governments (SJCOG) has reviewed the above-referenced document with respect to traffic impacts pursuant to the California Environmental Quality Act (CEQA).

The establishment of a Regional Congestion Management Program (RCMP) is required by State Government Code, Section 65088 – 65089 10 and the County's Measure K Renewal Ordinance, Section 1. The purpose of the RCMP is to monitor the cumulative transportation impacts of growth of the regional roadway system, establish a level of service standard, identify deficient regional roadways and develop plans to mitigate the deficiencies, and encourage travel demand management and operational preservation.

The following roadways within Lodi's jurisdiction are monitored as part of the adopted RCMP Roadway Network:

Harney Ln. – Lower Sacramento Rd. to SR 99
Hutchins St. – Harney Rd. to Kettleman Ave (SR 12)
Lower Sacramento – Harney Lane to Turner Rd
Kettleman Lane (SR 12) – West City Limit to SR 99
Victor Rd. (SR 12) – SR 99 to East City Limits
Turner Rd. – West City Limits to Lower Sacramento Rd.
SR 99 – Northern to Southern City Limits

Member Agencies
CITIES OF
ESCALON,
LATHROP,
LODI,
MANTECA,
RIPON,
STOCKTON,
TRACY,
AND
THE COUNTY OF
SAN JOAQUIN

One of the major implementation actions of the RCMP is to establish and monitor Level of Service (LOS) conditions on the Network and to assess where any deficiencies exist. A roadway segment is considered deficient if operating at a LOS of “E” or “F” (as calculated per the RCMP’s adopted methodology). It should be noted that part of the methodology for determining the LOS includes the deduction of all interregional trips (pass-through trips that originate outside of the county), traffic generated from low-income housing, and traffic generated by high-density residential located within one-fourth mile of a fixed rail passenger station from the volumes. Once a deficient roadway segment is identified, the agency where the majority of a deficient segment physically lies will have twelve months to prepare a Deficiency Plan. Government Code Section 65089.4 details the required analysis and components of a Deficiency Plan.

A6-1

Upon implementation of the proposed General Plan’s land uses, the DEIR anticipates that several of the roadways listed on page one will exceed the CMP Program’s adopted LOS standards; with impacts to Kettleman and SR 99 being significant and unmitigable. CMP statute provides that, regardless of any overriding considerations that the City of Lodi may adopt as part of the FEIR, the jurisdiction will be required to prepare a Deficiency Plan at the time the roadway becomes deficient.

A6-2

Although roadway segments operating at LOS “D” (per RCMP methodology) are not considered deficient within the RCMP, this standard does trigger a requirement. Roadway segments operating at LOS “D” are subject to the preparation of a plan that analyzes specific strategies for operational preservation and transportation demand management. SJCOG is currently preparing a Regional Travel Demand Management Action Plan the will give future guidance. SJCOG does recognize and commends the City on its incorporation of the policies that tie directly to the intent of the Regional Congestion Management Program.

A second major implementation action of the CMP is the CMA’s requirement to analyze and comment on future land uses that may impact roadways located within the RCMP network. The *Land Use Analysis Process* was adopted as part of the 2007 Regional Congestion Management Plan and is also part of state CMP Legislation (Section 65089) and the Measure K Renewal Ordinance. SJCOG now receives referrals from member jurisdictions development proposals for review, analysis and follow-up action where appropriate as part of RCMP implementation. Based on analysis using the RCMP process, proposals resulting in a degradation of LOS conditions require the identification and implementation of mitigation measures to resolve or mitigate the identified impact(s).

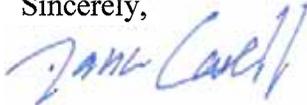
A6-3

SJCOG Comments – Lodi GP
January 11, 2010

As future land use projects that generate 125 or more peak hour trips go forward with the entitlement process, SJCOG, in implementing the RCMP, will require that the potential impacts to roadways be analyzed within the project's Traffic Impact Analysis (TIA) and accompanying EIR. The TIA and EIR should each contain a section that specifically addresses requirements and standards of the Regional Congestion Management Program.

Thank you for the opportunity to review and comment on Lodi's General Plan. If you have any questions please call the RCMP's lead planner, Laura Brunn, at (209) 235-0579. We would be pleased to meet with the city concerning these comments if that would be helpful.

Sincerely,



DANA COWELL
Deputy Director

**SAN JOAQUIN COUNTY
COMMUNITY DEVELOPMENT DEPARTMENT**

1810 E. HAZELTON AVE., STOCKTON, CA 95205-6232
PHONE: 209/468-3121 FAX: 209/468-3163

January 11, 2010

RECEIVED

JAN 12 2010

COMMUNITY DEVELOPMENT DEPT
CITY OF LODI

Rad Bartlam
Community Development Department
City of Lodi
Post Office Box 3006
Lodi, CA 95241-1910

RE: LODI GENERAL PLAN DRAFT ENVIRONMENTAL IMPACT REPORT
SCH #2009022075

Dear Mr. Bartlam:

A7-1

The San Joaquin County Community Development Department appreciates the opportunity to review the above referenced document. We have reviewed the Draft Environmental Impact Report (EIR) and offer the following comments.

The draft EIR makes several references to the "Armstrong Road Agricultural/Cluster Study Area". This area is entirely within the unincorporated portion of San Joaquin County, and subject to land use authority by the San Joaquin County Board of Supervisors. Although there have been discussions regarding the potential for creation of the Armstrong Road Agricultural/Cluster Zoning classification, the County is not engaged in any studies of this area, nor involved in the preparation of any Specific Plans or other planning programs for this area. On April 21, 2009, the San Joaquin County Board of Supervisors voted to authorize the Community Development Director to send a letter to the City of Lodi clarifying the Board's position that the City of Lodi must submit the necessary applications for the creation of the Specific Plan and preparation of the EIR and pay all costs associated with the review and processing of the application for the creation of the Armstrong Road Agricultural/Cluster Zoning classification. Pursuant to the Board's action, the enclosed letter was sent to the City of Lodi on April 23, 2009. To date, the City has not submitted any applications or application fees to the San Joaquin County Community Development Department for the creation of the Armstrong Road Agricultural/Cluster Zoning.

If you have any questions, I can be reached at (209) 468-3140. Again, thank you for the opportunity to comment on the City's Draft EIR.

Sincerely,

A handwritten signature in black ink, appearing to read "Kerry Sullivan".

KERRY SULLIVAN
Director

KS:ss
SONIA/KERRY/BARTLAM LTR

Enclosure

c: Board of Supervisors
Manuel Lopez
David Wooten
Mark Myles
Ray Hoo

File: Cluster Zone



**SAN JOAQUIN COUNTY
COMMUNITY DEVELOPMENT DEPARTMENT**

1810 E. HAZELTON AVE., STOCKTON, CA 95205-8232
PHONE: 209/468-3121 FAX: 209/468-3163

April 23, 2009

Blair King, City Manager
City of Lodi, City Hall
221 West Pine Street
Lodi, CA 95240

Dear Mr. King:

Re: Armstrong Road Agricultural/Cluster Zoning Classification

On April 21, 2009, the San Joaquin County Board of Supervisors authorized the Community Development Department to send a letter to the City of Lodi clarifying the Board's position that the City of Lodi must submit the necessary applications for the creation of the Specific Plan and preparation of the Environmental Impact Report (EIR) and pay all costs associated with the review and processing of the applications for the creation of the Armstrong Road Agricultural/Cluster Zoning Classification. Two consulting firms submitted adequate proposals for preparation of the Specific Plan and EIR. Mintier Harnish's proposal is for \$483,486.00 and Augustine Planning Associates is for \$366,208.00. As both proposals meet the requirements of the Request for Proposal, the Community Development Department would like to award the contract to Augustine Planning Associates in the event that the City of Lodi elects to go forward with the project. The total cost for the Specific Plan and EIR would be \$488,108.00, based upon the consultant fee plus the County's administrative fees of 26.5% of the cost of the EIR, plus 35% of the cost of the Specific Plan. Enclosed is an application form for the Specific Plan.

Section 9-806.2 (enclosed) of the Development Title states that:

Applications for Specific Plans or Specific Plan Amendments may be initiated by the Board of Supervisors, Planning Commission, Director of Community Development, or the property owner or the property owner's authorized agent.

Since the City of Lodi will be the applicant, the City will serve as the "property owner's authorized agent." When the City submits the fees and application materials, the City also needs to submit documentation in writing from the property owners within the

Letter to Blair King
Armstrong Road Cluster Zone
April 23, 2009
Page2

proposed project area that the City of Lodi is representing them in the application process.

Please contact me if you have any questions. I can be reached at (209) 468-3140.

Sincerely,

A handwritten signature in black ink that reads "Kerry Sullivan". The signature is written in a cursive style with a long horizontal flourish at the end.

KERRY SULLIVAN,
DIRECTOR

/eel

Enclosures

c: Board of Supervisors
Manuel Lopez
David Wooten
Mark Myles

File: ClusterZone4-23-09

(b) **Board of Supervisors.** The Board of Supervisors shall hold a Public Hearing to take final action if the Planning Commission has recommended approval or if the Planning Commission's denial was appealed. (Ord. 3715)

9-805.4 APPROVAL.

Prior to approving an application for a Public Financing Plan or a Public Financing Plan Amendment, the Planning Commission and the Board of Supervisors shall determine that the Public Financing Plan or the Public Financing Plan Amendment is consistent with the General Plan and applicable Master Plan. (Ord. 3715)

9-805.5 RECOVERY OF COSTS.

For a Public Financing Plan or a Public Financing Plan Amendment prepared at the County's expense, the Board of Supervisors may impose a Public Financing Plan fee. The fee shall be applied to persons seeking approvals for development within the area covered by the Public Financing Plan or Public Financing Plan Amendment. The fee charged shall be a prorated amount determined on the basis of the amount of land proposed for development expressed as a percentage of the total land included in the applicable Public Financing Plan or Public Financing Plan Amendment. (Ord. 3715)

CHAPTER 9-806

SPECIFIC PLANS

Sections:

- 9-806.1 Intent.**
- 9-806.2 Requirements for Application.**
- 9-806.3 Review Procedures.**
- 9-806.4 Approval.**
- 9-806.5 Recovery of Costs.**

9-806.1 INTENT.

The intent of this Chapter is to provide a method for adopting and amending Specific Plans, as provided in the California Government Code.

(Ord. 3675)

9-806.2 REQUIREMENTS FOR APPLICATION.

Applications for Specific Plans or Specific Plan Amendments may be initiated by the Board of Supervisors, Planning Commission, Director of Community Development, or the property owner or the property owner's authorized agent. Applications shall be filed with the Community Development Department. A fee, as specified by resolution of the Board of Supervisors, shall be required.

(Ord. 3675)

9-806.3 REVIEW PROCEDURES.

Specific Plan Applications shall be reviewed using the Public Hearing Review Procedure in Chapter 9-220, with modifications as provided in this Section.

(a) **Planning Commission.** At the conclusion of the Public Hearing, the Planning Commission shall recommend approval of the application or deny the application.

(1) If the Planning Commission recommends approval, the application shall be reviewed by the Board of Supervisors.

(2) If the Planning Commission denies the Specific Plan Application, the action is final, unless appealed to the Board of Supervisors.

(b) **Board of Supervisors.** The Board of Supervisors shall hold a Public Hearing to take final action if the Planning Commission has recommended approval or if the Planning Commission's denial was appealed. (Ord. 3675)

9-806.4 APPROVAL.

Prior to approving an application for a Specific Plan or a Specific Plan Amendment, the Planning Commission and the Board of Supervisors shall determine that the

**Comments to Planning Commission Regarding Draft General Plan and Draft EIR
Water and Infrastructure**

12/9/09

Jane Wagner-Tyack
145 South Rose Street, Lodi

1. Issues raised in 10/20/09 email to Mr. Bartlam

- The graphic on page 3-9 of the Draft General Plan is misleading because it minimizes the contribution of groundwater (well water) to Lodi's water supply. The graphic should show that we rely primarily on groundwater, that the time frame for recharge is quite long, and that the water does not necessarily become available in the future in the same place where it entered the ground originally. At a minimum, the title of the graphic should be changed. B1-1
- On page 3-10, right-hand column, third paragraph, the Draft General Plan says, "As the city grows, the available safe yield of the underlying groundwater will increase." This is a puzzling statement for which there appears to be no justification. At a minimum, the statement requires some explanation.

The Draft EIR actually addresses this by explaining (page 3.13-1) that the City will reduce its groundwater pumping from over 17,000 acre feet in 2008 "to a safe yield of approximately 15,000 acre-feet per year. This safe-yield estimate reflects an acreage-based relationship. Therefore, as the City's land area increases, the estimated safe yield of the underlying aquifer will likely increase."

Given the unpredictability of groundwater, this seems like a tenuous solution to Lodi's water supply needs. In addition, the connection between more city acreage and more access to groundwater constitutes a perverse incentive tending to encourage unsustainable urban growth and loss of agricultural land. As a policy, this should be discouraged. B1-2

- On page 3-17, the Draft General Plan says "Use of gray water or rainwater for non-potable uses may require installation of dual plumbing systems." Pages 3-33 – 3-34 (GM-P12) says "Support on-site gray water and rainwater harvesting systems for households and businesses" – I encourage the city to pursue these alternatives. B1-3

A careful reading of the Draft General Plan makes it clear that water supply and wastewater treatment options do not support projected growth. Rather than point out relevant sections in that draft, I have noted them below in comments on the Draft EIR.

2. Comments on the Draft EIR

B1-4

- The correct formal name of the Delta is the Sacramento-San Joaquin Delta. The area is also correctly referred to as the San Francisco Bay-Delta Estuary.

B1-5

- Camanche Reservoir is misspelled.

B1-6

- This page refers to Figure 3.7-1 regarding Groundwater Basins, but the figure itself doesn't specifically identify groundwater sub-basins, only watersheds. The title of the graphic is "Regional Watersheds and Waterways." The identification of groundwater basins needs to be more clear.

In categories related to hydrology, water quality, and infrastructure, the Draft EIR identifies the impact of the General Plan as "less than significant" and reports that no mitigation is required, in some cases because "[the] impact would be mitigated by existing State and local regulations and proposed General Plan policies." This wording undoubtedly meets regulatory requirements, but I urge you to exercise common sense in addressing the spirit as well as the letter of the regulations with respect to water supply and wastewater treatment. Specifically:

B1-7

- "Upon construction of the new surface water treatment plant, the City would have a long-term water supply of 27,000 acre feet per year available from its current safe yield of groundwater and the future surface water supplies." The Draft General Plan (page 3-10) assumes that even with a 15% reduction in residential demand due to the installation of water meters, "the total city-wide demand at reasonable development [would be about] 29,380 acre-feet per year." **That is a shortfall of 2,380 acre-feet per year under a best-case scenario for both supply and demand.**

B1-8

- The Draft General Plan, (page 3-23) and the Draft EIR (3.13-20 and 21) list inadequacies in the City's wastewater facilities. The Sewer Outfall from the City to the WSWPCF does not have adequate capacity for the PWWF [peak wet weather flows] at reasonable development of the General Plan. The City is already aware that expansion of WSWPCF will be required in the near future, and a tertiary filtration facility is part of that plan.

Wastewater discharge by cities in the Delta region has come under increasing scrutiny, not just because it affects the quality of export water (which we might like to assume is not our problem) but because it adversely affects fish and other species and their habitat in the Delta and the Estuary. This is our problem. Although I don't know the details, I believe the California Sportfishing Protection Alliance has already challenged Lodi's treatment of some of its wastewater. **The City should be aware that pressure is increasing from the State for cities in the Delta region to treat their wastewater discharge to a very high level—likely higher than we have planned for.**

Recommendations

The City should aggressively pursue gray water systems, rainwater harvesting and cisterns, dry wells, and water recycling in addition to rigorous water conservation, including increased use of drought-tolerant landscaping by the City itself. The dual plumbing systems necessary for gray water and harvested rainwater use are allowed under this General Plan. The City should revisit the issue of the cost-effectiveness of delivering recycled water to potential demand locations. The existing Water Conservation Ordinance needs to be strictly enforced, and the City itself should be following the Ordinance. Efforts at public education need to be increased, with the City considering incentives as well as penalties with respect to wise water use.

B1-9

The Draft EIR makes it clear that there is no lack of State regulations and local plans and ordinances addressing water issues, and General Plan policies require planning for water supply and availability before development takes place. Necessary infrastructure must be provided in a “timely” manner—but in practice, we know that budgetary constraints do not allow the City to meet this requirement in every case.

It is the job of city planners to take growth projections, however they are arrived at, and give decision-makers a plan that provides for that projected growth. It is possible to make assumptions and update demand and supply calculations in ways that support that projected growth. However, it falls to Lodi decision-makers to connect the dots in this General Plan without relying on optimistic assumptions or estimates. The Draft General Plan and Draft EIR clearly show that water availability and wastewater treatment place inescapable constraints on Lodi’s growth. I urge you to require a General Plan that acknowledges actual, realistic limits on water availability, wastewater treatment, and the City’s ability to provide necessary water infrastructure, allowing for growth only within those realistic limits.

B1-10

The Final EIR requires responses to public comments. I look forward to seeing these comments addressed there.



Steven A. Herum
sherum@herumcrabtree.com

January 8, 2010

City of Lodi Community Development Department
Lodi City Hall
Post Office Box 3006
Lodi, California 95241-1910

Re: City of Lodi General Plan EIR

Dear Members of the Lodi Community Development Department:

These comments on the City of Lodi General Plan Draft Environmental Impact Report are submitted on behalf of property owners generally located in the southern part of the City's General Plan and generally described in the draft General Plan as Alternative A. Several members of the client group presently enjoy the PRR General Plan designation. My client group favors Alternative A and favors retaining the PRR General Plan designation (or its new equivalent) in the new general plan.

1. The PR designation contains special rights that should not be obliterated by this new General Plan.

By way of background three local families, the Fry, Costa, Beckman, and Fink families, actively participated in the 1990 Lodi General Plan update. Specifically they asked that their property be included in the General Plan so that ancillary infrastructure plans, such as water, sewer and storm drain, could be designed to include their properties. After more than fifteen presentations to the planning commission and city council, the city council agreed to include these properties in the General Plan with a designation of PRR and agree that infrastructure plans would be designed to include capacity for these territories. As a condition for this city action the City required the landowners to enter into a formal agreement with the City to pay for their fair share of oversized infrastructure. A formal agreement was negotiated and submitted by City Attorney Bob W. McNatt to the City Council for approval. The City Council approved the agreement as recommended by staff.

It is vital to note that during the course of these numerous hearings no member of the public appeared and opposed the request of these three families.

The essence of the agreement focuses on the property owners' promise to pay their fair share contribution to oversize a sewer line that could serve their properties. The property

owners agreed to pay their fair share contribution when the City of Lodi demanded that payment be made. Subsequently, on July 11, 1997, the City Attorney authored an opinion about the agreement, stating:

"Your current clients (Fry, Costa, Beckman and Fink) have a beneficial interest in the improvements which they may wish to save by seeking specific performance on their behalf. The sizing and location of the improvements is directly for the benefit of your current clients, not for the benefit of the City."

(Emphasis and underlining added.)

Indeed, the City subsequently, in May 2003, made a demand based upon the Agreement for the property owners to pay their fair share for oversizing the sewer line. The property owners promptly satisfied the City's demand by submitting \$177,789.72 as their fair share for oversizing the sewer line.

As the City Attorney has opined, the oversizing of the sewer line is for the benefit of these property owners and not for the benefit of the City. If the City takes away the PRR designation then these property owners will be deprived of the benefit of their bargain from the Agreement and will have relied upon City actions to their detriment. Hence notions of fairness and minimum legal requirements compel the City to retain the PRR designation or equivalent for these properties.

B2-1

Since these properties need to retain a land use designation signifying that the properties are expected to build out during the General Plan planning period it makes sense to include the remainder of Area A within the General Plan.

2. Alternative A is the Environmental Superior Alternative for the General Plan and can facilitate the City's two percent growth policy.

The Draft EIR admits that Alternative A is the environmental superior alternative. (DEIR at e-6, 4-20.) It has "fewer vehicle trips, miles of travel, hours of travel and hours of delay than the proposed general plan." (DEIR at 4-8.) It has "reduced impact to agricultural resources (DEIR at 4-9) less VTMs (DEIR at 4-10), and less demand for fire, police and other emergency services. DEIR at 4-17.

The DEIR's criticism of Alternative A is that it cannot independently facilitate meeting the City's two percent growth policy and therefore this policy will not be attained and ambient growth pressure will be redirected to other communities.

This analysis is fatally flawed for two reasons:

First, an environmentally superior alternative does not need to match all of the project objectives in order to be a viable alternative. See

B2-2

Second, this means that Alternative A can be matched or blended with either the preferred alternative or with another alternative and facilitate the two percent growth policy. To the extent this method places additional land into the general plan than may be anticipated for development during the general plan's planning period, the City's annexation policy can control the rate, location and timing of the City's expansion with an eye toward the efficient provision for services, environmental considerations and preservation of agricultural lands.

B2-3

In short, the Draft EIR ineffectively dispenses with the environmental superior alternative by designing false choices. Correctly framed, the issue isn't whether Alternative A should be adopted to the exclusion of the preferred alternative. Instead the correct way to view the question is whether Alternative A (the environmentally superior alternative) can be integrated into another alternative with the City's future growth pattern determined by the City's annexation policy.

In advance, thank you for your attention to these comments.

Very truly yours,



STEVEN A. HERUM
Attorney-at-Law

SAH:lac

cc: Client

City of Lodi Community Development Department
 Lodi City Hall
 Post Office Box 3006
 Lodi, California 95241-1910

Re: City of Lodi General Plan Draft EIR

Dear Lodi Community Development Department,

- Alternative A should be adopted or integrated into the Draft Preferred General Plan Alternative for several reasons: B3-1
 - It is the environmentally superior alternative
 - It is the most logical progression of the City's growth is to the South due to the current planning designation of PRR which was established in the 1991 General Plan and should not be removed and placed to the West side of the City
 - It retains the PRR General Plan designation (or as it is called in the new General Plan, Urban Reserve [UR]) in the new general plan.
 - It does not revoke the decision or the integrity of past city council members of establishing the PRR zone [South of Harney Lane, North of Armstrong Road, East of Lower Sacramento Road and west of Highway 99].
 - It does not revoke the good faith effort/cooperation Armstrong Road Property Owners have done to research and propose the Armstrong Road Agricultural Cluster Zoning Concept. In the property owners good faith effort they have never stated over the many years of discussion of taking away or removing the PRR zoning south of Harney Lane. So it would be of bad faith and poor cooperation for the City of Lodi to remove the PRR south of Harney and place it on the West side. B3-2
 - The DEIR does not state what factors caused the Urban Reserve or PRR to be moved from South of Harney to the west side, when the most recent developments have been south of Harney Lane [The Blue Shield Project and the new Costco Project in 2010]. So it would be a logical conclusion for the city to grow south due to all the infrastructure planning south of Harney Lane B3-3
 - The definition of UR is as follows: The Plan identifies Urban Reserve areas to provide additional area for development, if sufficient capacity to accommodate growth in the initial phases is not available.
 - So to fulfill the growth needs of Lodi, Urban Reserve should be maintained in the area described above south of Harney Lane and North of Armstrong Road. If more area is needed to fill growth needs then establish a west side Urban Reserve B3-4
- Of the 16 topics [Land Use & Housing, Traffic & Circulation, Agricultural Resources, Biological Resources, Cultural Resources, Climate Change & Greenhouse Gases, Hydrology and Water Quality, Air Quality, Flood Hazards, Seismic & Geologic Hazards, Noise, Hazardous Materials & Toxics, Infrastructure, Public Facilities, Parks & Recreation and Visual Resources] evaluated in the DEIR, the Hydrology and Water Quality topic should be evaluated in more detail B3-5
 - Supply: What are the back-up procedures if 1, 2, 3 or more ground water pumps go dry or malfunction? Are water contracts in place for replacement? How fast can water be reestablished? Where would the city get their water? How does that affect agriculture? What are the costs associated with all the different options? Also, it is vital that the City of Lodi go forward as quickly as possible with the water treatment plant to use the banked Woodbridge Irrigation District surface water rather than pumping ground water. By pumping out of the over drafted ground water aquifer it has detrimental effects on the agricultural farming businesses surrounding the City of Lodi. As the saying goes, "No Water No Farming, No Farming No Food, No Food No Economy." Agriculture is the B3-6

economic engine in Lodi and San Joaquin County. According to an Economic Impact Report done by the Lodi Winegrape Commission and the Lodi District Grape Growers in 2009, wine and winegrapes alone have a \$5 billion economic impact to San Joaquin County. So, the City of Lodi needs to help in every way possible to keep agriculture economically viable which in turn keeps the City of Lodi economy moving. One step would be by switching their source of water from ground water to surface water.

B3-7

B3-8

B3-9

- Demand
- Quality
- Policy changes
 - C-P8 Adopt an agricultural conservation program (ACP) establishing a mitigation fee to protect and conserve agricultural lands:
 - Comments: When establishing the ACP, besides the City of Lodi residents and policy makers, surrounding property owners in San Joaquin County, the San Joaquin Farm Bureau and other agricultural interests should be fully involved in the process of establishing the ACP and mitigation fee
 - The ACP should encourage that conservation easement locations are prioritized but a ratio [agricultural land : land developed] and fee should not be established or set until the ACP is finalized
 - Existing language: C-P2: Work with San Joaquin County and relevant land owners to ensure economic viability of grape growing, winemaking, and supporting industries, to ensure the preservation of viable agricultural land use. New language: C-P2: Work with San Joaquin County, the City of Stockton, the City of Galt, San Joaquin Farm Bureau and surrounding land owners to ensure economic viability of all agricultural businesses and supporting industries to ensure the preservation of viable agricultural land use

Thank you for allowing my comments and taking them into consideration.

Bruce Fry
22000 Lower Sacramento Road
Acampo, CA
95220

RECEIVED

JAN 11 2010

COMMUNITY DEVELOPMENT DEPT
CITY OF LODI

January 10, 2010

City of Lodi
Community Development Dept.
Attn: Mr. Bartlam, Director
Lodi City Hall
P.O. Box 3006
Lodi, Ca. 95241

SUBJECT : Draft General Plan And Environmental Impact Report.

Dear Sir,

We, desire to make some comments concerning the City of Lodi's Draft General Plan, and the related Environmental Impact Report (EIR). Our concerns and comments follow:

Numerous years, countless hours, and significant expenses have been incurred trying to create a Community Separator along Armstrong Rd. separating the Cities of Lodi and Stockton.

The Armstrong Rd. property owners diligently met and cooperated with the City of Lodi, and San Joaquin County trying to arrive at a workable separator. However as of this date, nothing has happened. The plan for rezoning the proposed separator under county jurisdiction appears to have stagnated.

The current City of Lodi 1991 General Plan, designates the area South of Harney Ln., extending to The North side of Armstrong Rd. as Planned Residential Reserve (PRR). The new Preferred Draft Lodi General Plan, has removed the PRR designation from The North side of Armstrong Rd, extending a half mile south, and replaced it with the designation of "Armstrong Rd. Agriculture Cluster Study Area." Additionally, as an effort to accommodate the City's 2% growth policy, the new Preferred Draft General Plan designates Urban Reserve (UR) to the west and east of the City limits.

In view of all the cooperation and efforts between the City and the Armstrong Rd. property owners towards the goal of creating a separator, we are dismayed, that the City of Lodi's Draft Preferred General Plan, does not see fit to retain the current PRR, or the equivalent Urban Reserve (UR) designation for the Armstrong Rd. area. Back in 1991 when the current General Plan was adopted, Area property owners worked diligently, and at significant expense, to obtain the Planned Residential Reserve (PRR) designation for the Harney Ln. – Armstrong Rd. area. Removing the PRR or the equivalent Urban Reserve (UR) designation in the New General Plan, for the Armstrong Rd. area is not in Lodi's best interest.

Additionally, the Micke Grove Park area, and Lodi area, has always been synonymous. One would think that the City of Lodi would like to have some say in the future of the Micke Grove area. An urban reserve designation, adjacent to Micke Grove Park, would serve to “ earmark” the area for Lodi’s future plans.

B4-2

An additional concern to us is the fact that **the Draft EIR indicates that Alternative A, is the environmentally superior alternative.** In addition to other reasons, it indicates that it has a reduced impact on agricultural resources, and is the middle-ground development scenario. The Draft EIR also finds that Alternative A does not fully meet the City’s two percent growth policy. However, this could be accomplished by adjusting the planned urban reserve for the East and West boundaries of the City.

B4-3

The environment is an important consideration affecting our everyday lives, as well as future generations. It appears that to not take heed of the findings of the Draft EIR, and adopting the “Preferred Plan,” which has been approved by the Lodi Planning Commission, **contradicts the environmental guidelines established by the State of California.**

B4-4

In conclusion, we feel that the City of Lodi should adopt Alternative A as the “Preferred Plan” to govern Lodi’s future.

Thank you for the opportunity to express our thoughts and concerns in this matter.

Sincerely,



Joseph L. Manassero
541 W. Turner Road
Lodi, CA 95240

RECEIVED

JAN 11 2010

COMMUNITY DEVELOPMENT DEPT
CITY OF LODI

January 10, 2010

City of Lodi
Community Development Dept.
Attn: Mr. Bartlam, Director
Lodi City Hall
P.O. Box 3006
Lodi, Ca. 95241

SUBJECT : Draft General Plan And Environmental Impact Report.

Dear Sir,

We, desire to make some comments concerning the City of Lodi's Draft General Plan, and the related Environmental Impact Report (EIR). Our concerns and comments follow:

Numerous years, countless hours, and significant expenses have been incurred trying to create a Community Separator along Armstrong Rd. separating the Cities of Lodi and Stockton.

The Armstrong Rd. property owners diligently met and cooperated with the City of Lodi, and San Joaquin County trying to arrive at a workable separator. However as of this date, nothing has happened. The plan for rezoning the proposed separator under county jurisdiction appears to have stagnated.

The current City of Lodi 1991 General Plan, designates the area South of Harney Ln., extending to The North side of Armstrong Rd. as Planned Residential Reserve (PRR). The new Preferred Draft Lodi General Plan, has removed the PRR designation from The North side of Armstrong Rd, extending a half mile south, and replaced it with the designation of "Armstrong Rd. Agriculture Cluster Study Area." Additionally, as an effort to accommodate the City's 2% growth policy, the new Preferred Draft General Plan designates Urban Reserve (UR) to the west and east of the City limits.

In view of all the cooperation and efforts between the City and the Armstrong Rd. property owners towards the goal of creating a separator, we are dismayed, that the City of Lodi's Draft Preferred General Plan, does not see fit to retain the current PRR, or the equivalent Urban Reserve (UR) designation for the Armstrong Rd. area. Back in 1991 when the current General Plan was adopted, Area property owners worked diligently, and at significant expense, to obtain the Planned Residential Reserve (PRR) designation for the Harney Ln. – Armstrong Rd. area. Removing the PRR or the equivalent Urban Reserve (UR) designation in the New General Plan, for the Armstrong Rd. area is not in Lodi's best interest.

B5-1

Additionally, the Micke Grove Park area, and Lodi area, has always been synonymous. One would think that the City of Lodi would like to have some say in the future of the Micke Grove area. An urban reserve designation, adjacent to Micke Grove Park, would serve to “ earmark” the area for Lodi’s future plans.

B5-2

An additional concern to us is the fact that **the Draft EIR indicates that Alternative A, is the environmentally superior alternative.** In addition to other reasons, it indicates that it has a reduced impact on agricultural resources, and is the middle-ground development scenario. The Draft EIR also finds that Alternative A does not fully meet the City’s two percent growth policy. However, this could be accomplished by adjusting the planned urban reserve for the East and West boundaries of the City.

B5-3

The environment is an important consideration affecting our everyday lives, as well as future generations. It appears that to not take heed of the findings of the Draft EIR, and adopting the “Preferred Plan,” which has been approved by the Lodi Planning Commission, **contradicts the environmental guidelines established by the State of California.**

B5-4

In conclusion, we feel that the City of Lodi should adopt Alternative A as the “Preferred Plan” to govern Lodi’s future.

Thank you for the opportunity to express our thoughts and concerns in this matter.

Sincerely,



Catherine T. Manassero
541 W. Turner Road
Lodi, CA 95240

RECEIVED

JAN 11 2010

COMMUNITY DEVELOPMENT DEPT
CITY OF LODI

January 10, 2010

City of Lodi
Community Development Dept.
Attn: Mr. Bartlam, Director
Lodi City Hall
P.O. Box 3006
Lodi, Ca. 95241

SUBJECT : Draft General Plan And Environmental Impact Report.

Dear Sir,

We, desire to make some comments concerning the City of Lodi's Draft General Plan, and the related Environmental Impact Report (EIR). Our concerns and comments follow:

Numerous years, countless hours, and significant expenses have been incurred trying to create a Community Separator along Armstrong Rd. separating the Cities of Lodi and Stockton.

The Armstrong Rd. property owners diligently met and cooperated with the City of Lodi, and San Joaquin County trying to arrive at a workable separator. However as of this date, nothing has happened. The plan for rezoning the proposed separator under county jurisdiction appears to have stagnated.

The current City of Lodi 1991 General Plan, designates the area South of Harney Ln., extending to The North side of Armstrong Rd. as Planned Residential Reserve (PRR). The new Preferred Draft Lodi General Plan, has removed the PRR designation from The North side of Armstrong Rd, extending a half mile south, and replaced it with the designation of "Armstrong Rd. Agriculture Cluster Study Area." Additionally, as an effort to accommodate the City's 2% growth policy, the new Preferred Draft General Plan designates Urban Reserve (UR) to the west and east of the City limits.

In view of all the cooperation and efforts between the City and the Armstrong Rd. property owners towards the goal of creating a separator, we are dismayed, that the City of Lodi's Draft Preferred General Plan, does not see fit to retain the current PRR, or the equivalent Urban Reserve (UR) designation for the Armstrong Rd. area. Back in 1991 when the current General Plan was adopted, Area property owners worked diligently, and at significant expense, to obtain the Planned Residential Reserve (PRR) designation for the Harney Ln. – Armstrong Rd. area. Removing the PRR or the equivalent Urban Reserve (UR) designation in the New General Plan, for the Armstrong Rd. area is not in Lodi's best interest.

B6-1

Additionally, the Micke Grove Park area, and Lodi area has always been synonymous. One would think that the City of Lodi would like to have some say in the future of the Micke Grove area. An urban reserve designation, adjacent to Micke Grove Park would serve to “ earmark” the area for Lodi ‘s future plans.

B6-2

An additional concern to us is the fact that, **The Draft EIR indicates that Alternative A, is the environmental superior alternative.** In addition to other reasons, it indicates that it has a reduced impact on agricultural resources, and is the middle- ground development scenario. The Draft EIR also finds that Alternative A does not fully meet the City’s two percent growth policy. However, this could be accomplished by adjusting the planned urban reserve for the East and West boundaries of the City.

B6-3

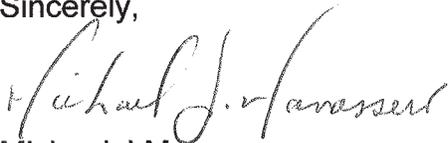
The Environment is an important consideration affecting our everyday lives, as well as future generations. It appears that to not take heed of the findings of the Draft EIR, and adopting the “preferred plan” which has been approved by the City of Lodi Planning Commission, contradicts the environmental guidelines established by the State of California.

B6-4

In conclusion , we feel that the City of Lodi should adopt Alternative A as the preferred plan to govern. Lodi’s future.

Thank you for the opportunity to express our thoughts and concerns in this matter.

Sincerely,



Michael J. Manassero
1490 E. Harney Ln.
Lodi, Ca. 95242

RECEIVED

JAN 11 2010

COMMUNITY DEVELOPMENT DEPT
CITY OF LODI

January 10, 2010

City of Lodi
Community Development Dept.
Attn: Mr. Bartlam, Director
Lodi City Hall
P.O. Box 3006
Lodi, Ca. 95241

SUBJECT : Draft General Plan And Environmental Impact Report.

Dear Sir,

We, desire to make some comments concerning the City of Lodi's Draft General Plan, and the related Environmental Impact Report (EIR). Our concerns and comments follow:

Numerous years, countless hours, and significant expenses have been incurred trying to create a Community Separator along Armstrong Rd. separating the Cities of Lodi and Stockton.

The Armstrong Rd. property owners diligently met and cooperated with the City of Lodi, and San Joaquin County trying to arrive at a workable separator. However as of this date, nothing has happened. The plan for rezoning the proposed separator under county jurisdiction appears to have stagnated.

The current City of Lodi 1991 General Plan, designates the area South of Harney Ln., extending to The North side of Armstrong Rd. as Planned Residential Reserve (PRR). The new Preferred Draft Lodi General Plan, has removed the PRR designation from The North side of Armstrong Rd, extending a half mile south, and replaced it with the designation of "Armstrong Rd. Agriculture Cluster Study Area." Additionally, as an effort to accommodate the City's 2% growth policy, the new Preferred Draft General Plan designates Urban Reserve (UR) to the west and east of the City limits.

In view of all the cooperation and efforts between the City and the Armstrong Rd. property owners towards the goal of creating a separator, we are dismayed, that the City of Lodi's Draft Preferred General Plan, does not see fit to retain the current PRR, or the equivalent Urban Reserve (UR) designation for the Armstrong Rd. area. Back in 1991 when the current General Plan was adopted, Area property owners worked diligently, and at significant expense, to obtain the Planned Residential Reserve (PRR) designation for the Harney Ln. – Armstrong Rd. area. Removing the PRR or the equivalent Urban Reserve (UR) designation in the New General Plan, for the Armstrong Rd. area is not in Lodi's best interest.

B7-1

Additionally, the Micke Grove Park area, and Lodi area has always been synonymous. One would think that the City of Lodi would like to have some say in the future of the Micke Grove area. An urban reserve designation, adjacent to Micke Grove Park would serve to "earmark" the area for Lodi 's future plans.

B7-2

An additional concern to us is the fact that, **The Draft EIR indicates that Alternative A, is the environmental superior alternative.** In addition to other reasons, it indicates that it has a reduced impact on agricultural resources, and is the middle- ground development scenario. The Draft EIR also finds that Alternative A does not fully meet the City's two percent growth policy. However, this could be accomplished by adjusting the planned urban reserve for the East and West boundaries of the City.

B7-3

The Environment is an important consideration affecting our everyday lives, as well as future generations. It appears that to not take heed of the findings of the Draft EIR, and adopting the "preferred plan" which has been approved by the City of Lodi Planning Commission, contradicts the environmental guidelines established by the State of California.

B7-4

In conclusion , we feel that the City of Lodi should adopt Alternative A as the preferred plan to govern. Lodi's future.

Thank you for the opportunity to express our thoughts and concerns in this matter.

Sincerely,



Patricia M. Manassero
1490 E. Harney Ln.
Lodi, Ca. 95242

January 10, 2010

City of Lodi Community Development Department
Lodi City Hall
P.O. Box 3006
Lodi, Ca. 95241

RECEIVED
JAN 11 2010
COMMUNITY DEVELOPMENT DEPT
CITY OF LODI

Attn: Mr. Bartlam

Re: City of Lodi Draft General Plan and EIR

Dear Mr. Bartlam:

As a citizen of the Lodi Community, I wish to take issue with the Draft General Plan which the City of Lodi is currently working on. My comments are identified below:

In choosing the currently proposed draft General Plan (referred to as the "preferred Plan") the City is not following the recommendation of The Environmental Impact Report, *funded by the citizens of Lodi tax dollars.*

B8-1

The **ENVIRONMENTAL IMPACT REPORT** finds that **Alterative A**, is the **environmental superior alternative**. It provides for less impact on the environment, as well as other significant reasons for it's adoption.

I feel that the New Lodi General Plan should Adopt Alternative A as the plan which will govern Lodi's future for the next 20+ years. **Do not adopt the currently proposed General Plan.**

B8-2

Sincerely,

Jack D. Ward

(Name)

583 W Turner Rd Lodi Calif

(Address)

January 10, 2010

City of Lodi Community Development Department
Lodi City Hall
P.O. Box 3006
Lodi, Ca. 95241

RECEIVED

JAN 11 2010

COMMUNITY DEVELOPMENT DEPT
CITY OF LODI

Attn: Mr. Bartlam

Re: City of Lodi Draft General Plan and EIR

Dear Mr. Bartlam:

As a citizen of the Lodi Community, I wish to take issue with the Draft General Plan which the City of Lodi is currently working on. My comments are identified below:

B9-1

In choosing the currently proposed draft General Plan (referred to as the "preferred Plan") the City is not following the recommendation of The Environmental Impact Report, *funded by the citizens of Lodi tax dollars.*

The **ENVIRONMENTAL IMPACT REPORT** finds that **Alternative A, is the environmental superior alternative.** It provides for less impact on the environment, as well as other significant reasons for it's adoption.

B9-2

I feel that the New Lodi General Plan should Adopt Alternative A as the plan which will govern Lodi's future for the next 20+ years. **Do not adopt the currently proposed General Plan.**

Sincerely,

Joseph M Kuehler
(Name)

989 E Armstrong Rd.
(Address)

Lodi, Ca. 95242

January 10, 2010

City of Lodi Community Development Department
Lodi City Hall
P.O. Box 3006
Lodi, Ca. 95241

RECEIVED

JAN 11 2010

COMMUNITY DEVELOPMENT DEPT
CITY OF LODI

Attn: Mr. Bartlam

Re: City of Lodi Draft General Plan and EIR

Dear Mr. Bartlam:

As a citizen of the Lodi Community, I wish to take issue with the Draft General Plan which the City of Lodi is currently working on. My comments are identified below:

In choosing the currently proposed draft General Plan (referred to as the "preferred Plan") the City is not following the recommendation of The Environmental Impact Report, *funded by the citizens of Lodi tax dollars*.

B10-1

The **ENVIRONMENTAL IMPACT REPORT** finds that **Alternative A, is the environmental superior alternative**. It provides for less impact on the environment, as well as other significant reasons for it's adoption.

I feel that the New Lodi General Plan should Adopt Alternative A as the plan which will govern Lodi's future for the next 20+ years. **Do not adopt the currently proposed General Plan.**

B10-2

Sincerely,

Gregory M... ..
(Name)

541 W Turner Rd Lodi
(Address)

January 10, 2010

City of Lodi Community Development Department
Lodi City Hall
P.O. Box 3006
Lodi, Ca. 95241

RECEIVED
JAN 11 2010
COMMUNITY DEVELOPMENT DEPT
CITY OF LODI

Attn: Mr. Bartlam

Re: City of Lodi Draft General Plan and EIR

Dear Mr. Bartlam:

As a citizen of the Lodi Community, I wish to take issue with the Draft General Plan which the City of Lodi is currently working on. My comments are identified below:

B11-1

In choosing the currently proposed draft General Plan (referred to as the "preferred Plan") the City is not following the recommendation of The Environmental Impact Report, *funded by the citizens of Lodi tax dollars*.

The ***ENVIRONMENTAL IMPACT REPORT*** finds that **Alternative A, is the environmental superior alternative**. It provides for less impact on the environment, as well as other significant reasons for it's adoption.

B11-2

I feel that the New Lodi General Plan should Adopt Alternative A as the plan which will govern Lodi's future for the next 20+ years. **Do not adopt the currently proposed General Plan.**

Sincerely,



(Name)



(Address)

RECEIVED

JAN 11 2010

COMMUNITY DEVELOPMENT DEPT
CITY OF LODI

January 10, 2010

City of Lodi Community Development Department
Lodi City Hall
P.O. Box 3006
Lodi, Ca. 95241

Attn: Mr. Bartlam

Re: City of Lodi Draft General Plan and EIR

Dear Mr. Bartlam:

As a citizen of the Lodi Community, I wish to take issue with the Draft General Plan which the City of Lodi is currently working on. My comments are identified below:

In choosing the currently proposed draft General Plan (referred to as the "preferred Plan") the City is not following the recommendation of The Environmental Impact Report, *funded by the citizens of Lodi tax dollars*.

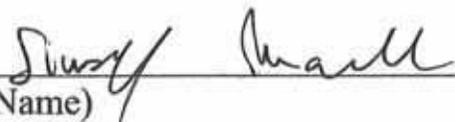
B12-1

The ***ENVIRONMENTAL IMPACT REPORT*** finds that **Alternative A**, is the **environmental superior alternative**. It provides for less impact on the environment, as well as other significant reasons for it's adoption.

I feel that the New Lodi General Plan should Adopt Alternative A as the plan which will govern Lodi's future for the next 20+ years. **Do not adopt the currently proposed General Plan.**

B12-2

Sincerely,



(Name)

2719 S. Stockton St., LODI 95240
(Address)

January 10, 2010

City of Lodi Community Development Department
Lodi City Hall
P.O. Box 3006
Lodi, Ca. 95241

RECEIVED
JAN 11 2010
COMMUNITY DEVELOPMENT DEPT
CITY OF LODI

Attn: Mr. Bartlam

Re: City of Lodi Draft General Plan and EIR

Dear Mr. Bartlam:

As a citizen of the Lodi Community, I wish to take issue with the Draft General Plan which the City of Lodi is currently working on. My comments are identified below:

B13-1

In choosing the currently proposed draft General Plan (referred to as the "preferred Plan") the City is not following the recommendation of The Environmental Impact Report, *funded by the citizens of Lodi tax dollars*.

The ***ENVIRONMENTAL IMPACT REPORT*** finds that **Alternative A, is the environmental superior alternative**. It provides for less impact on the environment, as well as other significant reasons for it's adoption.

B13-2

I feel that the New Lodi General Plan should Adopt Alternative A as the plan which will govern Lodi's future for the next 20+ years. **Do not adopt the currently proposed General Plan.**

Sincerely,

Grace Puccinelli

(Name)

2719 S. Stockton St. Lodi 95240

(Address)

RECEIVED

JAN 11 2010

COMMUNITY DEVELOPMENT DEPT
CITY OF LODI

January 10, 2010

City of Lodi Community Development Department
Lodi City Hall
P.O. Box 3006
Lodi, Ca. 95241

Attn: Mr. Bartlam

Re: City of Lodi Draft General Plan and EIR

Dear Mr. Bartlam:

As a citizen of the Lodi Community, I wish to take issue with the Draft General Plan which the City of Lodi is currently working on. My comments are identified below:

In choosing the currently proposed draft General Plan (referred to as the "preferred Plan") the City is not following the recommendation of The Environmental Impact Report, *funded by the citizens of Lodi tax dollars*.

B14-1

The **ENVIRONMENTAL IMPACT REPORT** finds that **Alterative A, is the environmental superior alternative**. It provides for less impact on the environment, as well as other significant reasons for it's adoption.

I feel that the New Lodi General Plan should Adopt Alternative A as the plan which will govern Lodi's future for the next 20+ years. **Do not adopt the currently proposed General Plan.**

B14-2

Sincerely,



(Name)

2259 S Ham Ln Lodi

(Address)

RECEIVED

JAN 11 2010

COMMUNITY DEVELOPMENT DEPT
CITY OF LODI

January 10, 2010

City of Lodi Community Development Department
 Lodi City Hall
 P.O. Box 3006
 Lodi, Ca. 95241

Attn: Mr. Bartlam

Re: City of Lodi Draft General Plan and EIR

Dear Mr. Bartlam:

As a citizen of the Lodi Community, I wish to take issue with the Draft General Plan which the City of Lodi is currently working on. My comments are identified below:

B15-1 In choosing the currently proposed draft General Plan (referred to as the "preferred Plan") the City is not following the recommendation of The Environmental Impact Report, *funded by the citizens of Lodi tax dollars*.

The ***ENVIRONMENTAL IMPACT REPORT*** finds that **Alternative A**, is the **environmental superior alternative**. It provides for less impact on the environment, as well as other significant reasons for it's adoption.

B15-2 I feel that the New Lodi General Plan should Adopt Alternative A as the plan which will govern Lodi's future for the next 20+ years. **Do not adopt the currently proposed General Plan.**

Sincerely,



(Name)

(Address)

10179 E Hwy 12 Lodi Ca 95240

RECEIVED

JAN 11 2010

COMMUNITY DEVELOPMENT DEPT
CITY OF LODI

January 10, 2010

City of Lodi Community Development Department
Lodi City Hall
P.O. Box 3006
Lodi, Ca. 95241

Attn: Mr. Bartlam

Re: City of Lodi Draft General Plan and EIR

Dear Mr. Bartlam:

As a citizen of the Lodi Community, I wish to take issue with the Draft General Plan which the City of Lodi is currently working on. My comments are identified below:

In choosing the currently proposed draft General Plan (referred to as the "preferred Plan") the City is not following the recommendation of The Environmental Impact Report, *funded by the citizens of Lodi tax dollars*.

B16-1

The ***ENVIRONMENTAL IMPACT REPORT*** finds that **Alternative A**, is the **environmental superior alternative**. It provides for less impact on the environment, as well as other significant reasons for it's adoption.

I feel that the New Lodi General Plan should Adopt Alternative A as the plan which will govern Lodi's future for the next 20+ years. **Do not adopt the currently proposed General Plan.**

B16-2

Sincerely,

Douglas Manassero 
(Name)

7558 East Woodbridge Rd Acampo 95220
(Address)

RECEIVED

JAN 11 2010

COMMUNITY DEVELOPMENT DEPT
CITY OF LODI

January 10, 2010

City of Lodi Community Development Department
Lodi City Hall
P.O. Box 3006
Lodi, Ca. 95241

Attn: Mr. Bartlam

Re: City of Lodi Draft General Plan and EIR

Dear Mr. Bartlam:

As a citizen of the Lodi Community, I wish to take issue with the Draft General Plan which the City of Lodi is currently working on. My comments are identified below:

B17-1

In choosing the currently proposed draft General Plan (referred to as the "preferred Plan") the City is not following the recommendation of The Environmental Impact Report, *funded by the citizens of Lodi tax dollars*.

The ***ENVIRONMENTAL IMPACT REPORT*** finds that **Alternative A, is the environmental superior alternative**. It provides for less impact on the environment, as well as other significant reasons for it's adoption.

B17-2

I feel that the New Lodi General Plan should Adopt Alternative A as the plan which will govern Lodi's future for the next 20+ years. **Do not adopt the currently proposed General Plan.**

Sincerely,



(Name)

23689 N. Sowles Rd, Acampo 95220

(Address)

January 10, 2010

City of Lodi Community Development Department
Lodi City Hall
P.O. Box 3006
Lodi, Ca. 95241

RECEIVED
JAN 11 2010
COMMUNITY DEVELOPMENT DEPT
CITY OF LODI

Attn: Mr. Bartlam

Re: City of Lodi Draft General Plan and EIR

Dear Mr. Bartlam:

As a citizen of the Lodi Community, I wish to take issue with the Draft General Plan which the City of Lodi is currently working on. My comments are identified below:

In choosing the currently proposed draft General Plan (referred to as the "preferred Plan") the City is not following the recommendation of The Environmental Impact Report, *funded by the citizens of Lodi tax dollars*.

B18-1

The **ENVIRONMENTAL IMPACT REPORT** finds that **Alterative A, is the environmental superior alternative**. It provides for less impact on the environment, as well as other significant reasons for it's adoption.

I feel that the New Lodi General Plan should Adopt Alternative A as the plan which will govern Lodi's future for the next 20+ years. **Do not adopt the currently proposed General Plan.**

B18-2

Sincerely,

Willy Weidinger
(Name)

2000 Delta Lodi
(Address)

January 10, 2010

City of Lodi Community Development Department
Lodi City Hall
P.O. Box 3006
Lodi, Ca. 95241

RECEIVED

JAN 11 2010

COMMUNITY DEVELOPMENT DEPT
CITY OF LODI

Attn: Mr. Bartlam

Re: City of Lodi Draft General Plan and EIR

Dear Mr. Bartlam:

As a citizen of the Lodi Community, I wish to take issue with the Draft General Plan which the City of Lodi is currently working on. My comments are identified below:

B19-1

In choosing the currently proposed draft General Plan (referred to as the "preferred Plan") the City is not following the recommendation of The Environmental Impact Report, *funded by the citizens of Lodi tax dollars*.

The **ENVIRONMENTAL IMPACT REPORT** finds that **Alternative A, is the environmental superior alternative**. It provides for less impact on the environment, as well as other significant reasons for it's adoption.

B19-2

I feel that the New Lodi General Plan should Adopt Alternative A as the plan which will govern Lodi's future for the next 20+ years. **Do not adopt the currently proposed General Plan.**

Sincerely,

Don Kemp
(Name)

916 Sylvia Dr Lodi
(Address)

January 10, 2010

City of Lodi Community Development Department
Lodi City Hall
P.O. Box 3006
Lodi, Ca. 95241

RECEIVED

JAN 11 2010

COMMUNITY DEVELOPMENT DEPT
CITY OF LODI

Attn: Mr. Bartlam

Re: City of Lodi Draft General Plan and EIR

Dear Mr. Bartlam:

As a citizen of the Lodi Community, I wish to take issue with the Draft General Plan which the City of Lodi is currently working on. My comments are identified below:

In choosing the currently proposed draft General Plan (referred to as the "preferred Plan") the City is not following the recommendation of The Environmental Impact Report, *funded by the citizens of Lodi tax dollars*.

B20-1

The ***ENVIRONMENTAL IMPACT REPORT*** finds that **Alternative A**, is the **environmental superior alternative**. It provides for less impact on the environment, as well as other significant reasons for it's adoption.

I feel that the New Lodi General Plan should Adopt Alternative A as the plan which will govern Lodi's future for the next 20+ years. **Do not adopt the currently proposed General Plan.**

B20-2

Sincerely,

Christine M. Bone

(Name)

1550E. Armstrong Rd. Lodi, CA 95242

(Address)

January 10, 2010

City of Lodi Community Development Department
Lodi City Hall
P.O. Box 3006
Lodi, Ca. 95241

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JAN 11 2010

COMMUNITY DEVELOPMENT DEPT
CITY OF LODI

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In choosing the currently proposed draft General Plan (referred to as the "preferred Plan") the City is not following the recommendation of The Environmental Impact Report, *funded by the citizens of Lodi tax dollars*.

The ***ENVIRONMENTAL IMPACT REPORT*** finds that **Alternative A**, is the **environmental superior alternative**. It provides for less impact on the environment, as well as other significant reasons for it's adoption.

I feel that the New Lodi General Plan should Adopt Alternative A as the plan which will govern Lodi's future for the next 20+ years. **Do not adopt the currently proposed General Plan.**

Sincerely,



(Name)

1301 E. Armstrong Rd, Lodi, 95242

(Address)

January 10, 2010

City of Lodi Community Development Department
 Lodi City Hall
 P.O. Box 3006
 Lodi, Ca. 95241

RECEIVED

JAN 11 2010

COMMUNITY DEVELOPMENT DEPT
 CITY OF LODI

Attn: Mr. Bartlam

Re: City of Lodi Draft General Plan and EIR

Dear Mr. Bartlam:

As a citizen of the Lodi Community, I wish to take issue with the Draft General Plan which the City of Lodi is currently working on. My comments are identified below:

In choosing the currently proposed draft General Plan (referred to as the "preferred Plan") the City is not following the recommendation of The Environmental Impact Report, *funded by the citizens of Lodi tax dollars*.

B22-1

The ***ENVIRONMENTAL IMPACT REPORT*** finds that **Alternative A**, is the **environmental superior alternative**. It provides for less impact on the environment, as well as other significant reasons for it's adoption.

I feel that the New Lodi General Plan should Adopt Alternative A as the plan which will govern Lodi's future for the next 20+ years. **Do not adopt the currently proposed General Plan.**

B22-2

Sincerely,

STEVE J. BORRA JR

(Name)

1550 E. ARMSTRONG RD. LODI, CA 95242

(Address)

January 10, 2010

City of Lodi Community Development Department
 Lodi City Hall
 P.O. Box 3006
 Lodi, Ca. 95241

RECEIVED

JAN 11 2010

COMMUNITY DEVELOPMENT DEPT
 CITY OF LODI

Attn: Mr. Bartlam

Re: City of Lodi Draft General Plan and EIR

Dear Mr. Bartlam:

As a citizen of the Lodi Community, I wish to take issue with the Draft General Plan which the City of Lodi is currently working on. My comments are identified below:

B23-1 In choosing the currently proposed draft General Plan (referred to as the "preferred Plan") the City is not following the recommendation of The Environmental Impact Report, *funded by the citizens of Lodi tax dollars*.

The ***ENVIRONMENTAL IMPACT REPORT*** finds that **Alternative A, is the environmental superior alternative**. It provides for less impact on the environment, as well as other significant reasons for it's adoption.

B23-2 I feel that the New Lodi General Plan should Adopt Alternative A as the plan which will govern Lodi's future for the next 20+ years. **Do not adopt the currently proposed General Plan.**

Sincerely,

Beverly Boush

(Name)

1301 E Armstrong Rd Lodi CA

(Address)

January 10, 2010

City of Lodi Community Development Department
Lodi City Hall
P.O. Box 3006
Lodi, Ca. 95241

RECEIVED

JAN 11 2010

COMMUNITY DEVELOPMENT DEPT
CITY OF LODI

Attn: Mr. Bartlam

Re: City of Lodi Draft General Plan and EIR

Dear Mr. Bartlam:

As a citizen of the Lodi Community, I wish to take issue with the Draft General Plan which the City of Lodi is currently working on. My comments are identified below:

In choosing the currently proposed draft General Plan (referred to as the "preferred Plan") the City is not following the recommendation of The Environmental Impact Report, *funded by the citizens of Lodi tax dollars*.

B24-1

The ***ENVIRONMENTAL IMPACT REPORT*** finds that **Alternative A**, is the **environmental superior alternative**. It provides for less impact on the environment, as well as other significant reasons for it's adoption.

I feel that the New Lodi General Plan should Adopt Alternative A as the plan which will govern Lodi's future for the next 20+ years. **Do not adopt the currently proposed General Plan.**

B24-2

Sincerely,

Lucie Borra

(Name)

12139 E Hwy 12 - Lodi

(Address)

January 10, 2010

City of Lodi Community Development Department
Lodi City Hall
P.O. Box 3006
Lodi, Ca. 95241

RECEIVED

JAN 11 2010

COMMUNITY DEVELOPMENT DEPT
CITY OF LODI

Attn: Mr. Bartlam

Re: City of Lodi Draft General Plan and EIR

Dear Mr. Bartlam:

As a citizen of the Lodi Community, I wish to take issue with the Draft General Plan which the City of Lodi is currently working on. My comments are identified below:

B25-1

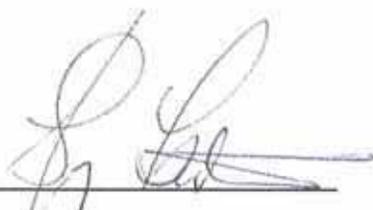
In choosing the currently proposed draft General Plan (referred to as the "preferred Plan") the City is not following the recommendation of The Environmental Impact Report, *funded by the citizens of Lodi tax dollars*.

The **ENVIRONMENTAL IMPACT REPORT** finds that **Alternative A, is the environmental superior alternative**. It provides for less impact on the environment, as well as other significant reasons for it's adoption.

B25-2

I feel that the New Lodi General Plan should Adopt Alternative A as the plan which will govern Lodi's future for the next 20+ years. **Do not adopt the currently proposed General Plan.**

Sincerely,

CHARY TOUTSOU 
(Name)

3725 E ARMSTRONG RD
(Address)
LODI, CA 95240

January 10, 2010

City of Lodi Community Development Department
Lodi City Hall
P.O. Box 3006
Lodi, Ca. 95241

RECEIVED

JAN 11 2010

COMMUNITY DEVELOPMENT DEPT
CITY OF LODI

Attn: Mr. Bartlam

Re: City of Lodi Draft General Plan and EIR

Dear Mr. Bartlam:

As a citizen of the Lodi Community, I wish to take issue with the Draft General Plan which the City of Lodi is currently working on. My comments are identified below:

In choosing the currently proposed draft General Plan (referred to as the "preferred Plan") the City is not following the recommendation of The Environmental Impact Report, *funded by the citizens of Lodi tax dollars*.

B26-1

The **ENVIRONMENTAL IMPACT REPORT** finds that **Alterative A**, is the **environmental superior alternative**. It provides for less impact on the environment, as well as other significant reasons for it's adoption.

I feel that the New Lodi General Plan should Adopt Alternative A as the plan which will govern Lodi's future for the next 20+ years. **Do not adopt the currently proposed General Plan.**

B26-2

Sincerely,

John Kessler
(Name)

3861 Armstrong Rd Lodi, Cal.
(Address)

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JAN 11 2010

COMMUNITY DEVELOPMENT DEPT
CITY OF LODI

January 10, 2010

City of Lodi Community Development Department
Lodi City Hall
P.O. Box 3006
Lodi, Ca. 95241

Attn: Mr. Bartlam

Re: City of Lodi Draft General Plan and EIR

Dear Mr. Bartlam:

As a citizen of the Lodi Community, I wish to take issue with the Draft General Plan which the City of Lodi is currently working on. My comments are identified below:

B27-1 In choosing the currently proposed draft General Plan (referred to as the "preferred Plan") the City is not following the recommendation of The Environmental Impact Report, *funded by the citizens of Lodi tax dollars*.

The ***ENVIRONMENTAL IMPACT REPORT*** finds that **Alterative A, is the environmental superior alternative**. It provides for less impact on the environment, as well as other significant reasons for it's adoption.

B27-2 I feel that the New Lodi General Plan should Adopt Alternative A as the plan which will govern Lodi's future for the next 20+ years. **Do not adopt the currently proposed General Plan.**

Sincerely,


(Name)

4051 E Armstrong Rd Lodi
(Address)

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JAN 11 2010

COMMUNITY DEVELOPMENT DEPT
CITY OF LODI

January 10, 2010

City of Lodi Community Development Department
Lodi City Hall
P.O. Box 3006
Lodi, Ca. 95241

Attn: Mr. Bartlam

Re: City of Lodi Draft General Plan and EIR

Dear Mr. Bartlam:

As a citizen of the Lodi Community, I wish to take issue with the Draft General Plan which the City of Lodi is currently working on. My comments are identified below:

In choosing the currently proposed draft General Plan (referred to as the "preferred Plan") the City is not following the recommendation of The Environmental Impact Report, *funded by the citizens of Lodi tax dollars*.

B28-1

The ***ENVIRONMENTAL IMPACT REPORT*** finds that **Alternative A**, is the **environmental superior alternative**. It provides for less impact on the environment, as well as other significant reasons for it's adoption.

I feel that the New Lodi General Plan should Adopt Alternative A as the plan which will govern Lodi's future for the next 20+ years. **Do not adopt the currently proposed General Plan.**

B28-2

Sincerely,



(Name)



(Address)

January 10, 2010

City of Lodi Community Development Department
Lodi City Hall
P.O. Box 3006
Lodi, Ca. 95241

RECEIVED

JAN 11 2010

COMMUNITY DEVELOPMENT DEPT
CITY OF LODI

Attn: Mr. Bartlam

Re: City of Lodi Draft General Plan and EIR

Dear Mr. Bartlam:

As a citizen of the Lodi Community, I wish to take issue with the Draft General Plan which the City of Lodi is currently working on. My comments are identified below:

B29-1

In choosing the currently proposed draft General Plan (referred to as the "preferred Plan") the City is not following the recommendation of The Environmental Impact Report, *funded by the citizens of Lodi tax dollars*.

The ***ENVIRONMENTAL IMPACT REPORT*** finds that **Alternative A**, is the **environmental superior alternative**. It provides for less impact on the environment, as well as other significant reasons for it's adoption.

B29-2

I feel that the New Lodi General Plan should Adopt Alternative A as the plan which will govern Lodi's future for the next 20+ years. **Do not adopt the currently proposed General Plan.**

Sincerely,

Marjorie Kramer

(Name)

23689 W. Sawles Rd.

(Address)

Acampo Ca 95220

January 10, 2010

City of Lodi Community Development Department
Lodi City Hall
P.O. Box 3006
Lodi, Ca. 95241

RECEIVED

JAN 11 2010

COMMUNITY DEVELOPMENT DEPT
CITY OF LODI

Attn: Mr. Bartlam

Re: City of Lodi Draft General Plan and EIR

Dear Mr. Bartlam:

As a citizen of the Lodi Community, I wish to take issue with the Draft General Plan which the City of Lodi is currently working on. My comments are identified below:

In choosing the currently proposed draft General Plan (referred to as the "preferred Plan") the City is not following the recommendation of The Environmental Impact Report, *funded by the citizens of Lodi tax dollars*.

B30-1

The ***ENVIRONMENTAL IMPACT REPORT*** finds that **Alternative A, is the environmental superior alternative**. It provides for less impact on the environment, as well as other significant reasons for it's adoption.

I feel that the New Lodi General Plan should Adopt Alternative A as the plan which will govern Lodi's future for the next 20+ years. **Do not adopt the currently proposed General Plan.**

B30-2

Sincerely,

Thomas Goding
(Name)

718 Willow Ave Lodi
(Address)

January 10, 2010

City of Lodi Community Development Department
Lodi City Hall
P.O. Box 3006
Lodi, Ca. 95241

RECEIVED

JAN 11 2010

COMMUNITY DEVELOPMENT DEPT
CITY OF LODI

Attn: Mr. Bartlam

Re: City of Lodi Draft General Plan and EIR

Dear Mr. Bartlam:

As a citizen of the Lodi Community, I wish to take issue with the Draft General Plan which the City of Lodi is currently working on. My comments are identified below:

B31-1

In choosing the currently proposed draft General Plan (referred to as the "preferred Plan") the City is not following the recommendation of The Environmental Impact Report, *funded by the citizens of Lodi tax dollars*.

The ***ENVIRONMENTAL IMPACT REPORT*** finds that **Alternative A, is the environmental superior alternative**. It provides for less impact on the environment, as well as other significant reasons for it's adoption.

B31-2

I feel that the New Lodi General Plan should Adopt Alternative A as the plan which will govern Lodi's future for the next 20+ years. **Do not adopt the currently proposed General Plan.**

Sincerely,

Louise Hells Gooding

(Name)

718 Willow Ave., Lodi

(Address)

January 10, 2010

City of Lodi Community Development Department
Lodi City Hall
P.O. Box 3006
Lodi, Ca. 95241

RECEIVED
JAN 11 2010
COMMUNITY DEVELOPMENT DEPT
CITY OF LODI

Attn: Mr. Bartlam

Re: City of Lodi Draft General Plan and EIR

Dear Mr. Bartlam:

As a citizen of the Lodi Community, I wish to take issue with the Draft General Plan which the City of Lodi is currently working on. My comments are identified below:

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B32-1

The ENVIRONMENTAL IMPACT REPORT finds that Alternative A, is the environmental superior alternative. It provides for less impact on the environment, as well as other significant reasons for it's adoption.

I feel that the New Lodi General Plan should Adopt Alternative A as the plan which will govern Lodi's future for the next 20+ years. **Do not adopt the currently proposed General Plan.**

B32-2

Sincerely,



(Name)

2217 W. Vine St, Lodi, CA 95242
(Address)



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License No. 632667

P.O. Box 1007 • Woodbridge, CA 95258

Lodi (209) 369-8255 Stockton (209) 464-3352 Fax (209) 368-0600



Since 1978

LETTER B33

January 10, 2010

City of Lodi Community Development Department
Lodi City Hall
P.O. Box 3006
Lodi, Ca. 95241

RECEIVED

JAN 11 2010

COMMUNITY DEVELOPMENT DEPT
CITY OF LODI

Attn: Mr. Bartlam

Re: City of Lodi Draft General Plan and EIR

Dear Mr. Bartlam:

As a citizen of the Lodi Community, I wish to take issue with the Draft General Plan which the City of Lodi is currently working on. My comments are identified below:

B33-1

In choosing the currently proposed draft General Plan (referred to as the "preferred Plan") the City is not following the recommendation of The Environmental Impact Report, *funded by the citizens of Lodi tax dollars*.

The **ENVIRONMENTAL IMPACT REPORT** finds that **Alterative A, is the environmental superior alternative**. It provides for less impact on the environment, as well as other significant reasons for it's adoption.

B33-1

I feel that the New Lodi General Plan should Adopt Alternative A as the plan which will govern Lodi's future for the next 20+ years. **Do not adopt the currently proposed General Plan.**

Sincerely,

(Name) MIKE MASON

1901 Windy Tree Lane, Lodi, CA 95242
(Address)



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License No. 632667

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LETTER B34

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JAN 11 2010

COMMUNITY DEVELOPMENT DEPT
CITY OF LODI

January 10, 2010

City of Lodi Community Development Department
Lodi City Hall
P.O. Box 3006
Lodi, Ca. 95241

Attn: Mr. Bartlam

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B34-1

The **ENVIRONMENTAL IMPACT REPORT** finds that **Alterative A**, is the **environmental superior alternative**. It provides for less impact on the environment, as well as other significant reasons for it's adoption.

I feel that the New Lodi General Plan should Adopt Alternative A as the plan which will govern Lodi's future for the next 20+ years. **Do not adopt the currently proposed General Plan.**

B34-2

Sincerely,

(Name) JACK DIORE

1254 Star Bridge DR, 95242

(Address)



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License No. 632667

P.O. Box 1007 • Woodbridge, CA 95258

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LETTER B35

RECEIVED

JAN 11 2010

COMMUNITY DEVELOPMENT DEPT
CITY OF LODI

January 10, 2010

City of Lodi Community Development Department
Lodi City Hall
P.O. Box 3006
Lodi, Ca. 95241

Attn: Mr. Bartlam

Re: City of Lodi Draft General Plan and EIR

Dear Mr. Bartlam:

As a citizen of the Lodi Community, I wish to take issue with the Draft General Plan which the City of Lodi is currently working on. My comments are identified below:

B35-1

In choosing the currently proposed draft General Plan (referred to as the "preferred Plan") the City is not following the recommendation of The Environmental Impact Report, *funded by the citizens of Lodi tax dollars*.

The **ENVIRONMENTAL IMPACT REPORT** finds that **Alternative A**, is the **environmental superior alternative**. It provides for less impact on the environment, as well as other significant reasons for it's adoption.

B35-2

I feel that the New Lodi General Plan should Adopt Alternative A as the plan which will govern Lodi's future for the next 20+ years. **Do not adopt the currently proposed General Plan.**

Sincerely,

(Name) STEVEN L. DIERDE

(Address) 6300 E HOGAN



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License No. 632667

P.O. Box 1007 • Woodbridge, CA 95258

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JAN 11 2010

COMMUNITY DEVELOPMENT DEPT
CITY OF LODI

January 10, 2010

City of Lodi Community Development Department
Lodi City Hall
P.O. Box 3006
Lodi, Ca. 95241

Attn: Mr. Bartlam

Re: City of Lodi Draft General Plan and EIR

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B36-1

The **ENVIRONMENTAL IMPACT REPORT** finds that **Alternative A**, is the **environmental superior alternative**. It provides for less impact on the environment, as well as other significant reasons for it's adoption.

I feel that the New Lodi General Plan should Adopt Alternative A as the plan which will govern Lodi's future for the next 20+ years. **Do not adopt the currently proposed General Plan.**

B36-2

Sincerely,

(Name) *ISAC RAMIREZ*

12539 N. Angier Rd Lodi, Ca 95240
(Address)



COMMERCIAL • INDUSTRIAL • RESIDENTIAL

License No. 632667

P.O. Box 1007 • Woodbridge, CA 95258

Lodi (209) 369-8255 Stockton (209) 464-3352 Fax (209) 368-0600



Since 1978

LETTER B37

RECEIVED

JAN 11 2010

COMMUNITY DEVELOPMENT DEPT
CITY OF LODI

January 10, 2010

City of Lodi Community Development Department
Lodi City Hall
P.O. Box 3006
Lodi, Ca. 95241

Attn: Mr. Bartlam

Re: City of Lodi Draft General Plan and EIR

Dear Mr. Bartlam:

As a citizen of the Lodi Community, I wish to take issue with the Draft General Plan which the City of Lodi is currently working on. My comments are identified below:

B37-1

In choosing the currently proposed draft General Plan (referred to as the "preferred Plan") the City is not following the recommendation of The Environmental Impact Report, *funded by the citizens of Lodi tax dollars*.

The **ENVIRONMENTAL IMPACT REPORT** finds that **Alterative A, is the environmental superior alternative**. It provides for less impact on the environment, as well as other significant reasons for it's adoption.

B37-2

I feel that the New Lodi General Plan should Adopt Alternative A as the plan which will govern Lodi's future for the next 20+ years. **Do not adopt the currently proposed General Plan.**

Sincerely,

(Name) Robert Lee

6504 E. Hogan Lane Lodi CA 95240
(Address)

3 Response to Comments on the Draft EIR

This chapter includes responses to each comment, and in the same order, as presented in Chapter 2. The responses are marked with the same number-letter combination as the comment to which they respond, as shown in the margin of the comment letters.

Proposed General Plan policies are referenced in several responses below. During preparation of the Draft EIR and this Final EIR, additional policy measures and edits to proposed policies were identified to further reduce potential impacts. New policy measures have been assigned with the suffix “NEW” (e.g. T-PNEW). Proposed policies that have been recommended for revisions are assigned with the suffix “EDIT” (e.g. T-P1EDIT); text additions are noted in underline and text deletions appear in ~~strikeout~~.

AGENCIES

A1: Central Valley Flood Protection Board

A1-1: The City acknowledges that the Central Valley Flood Protection Board’s (Board) jurisdiction includes the Mokelumne River, as a tributary of the San Joaquin River and that a Board permit will be required for activities, such as construction or landscaping, within the Board’s jurisdiction. This letter does not raise environmental issues under CEQA.

A2: Department of Transportation

A2-1: The City acknowledges that State Route 12 (Kettleman Lane) is a Caltrans State Highway and that the Congestion Management Program identifies a Level of Service standard of D for this route. The proposed General Plan policies both titled “T-NEW” on page 3.2-25 underscore the City’s understanding of the jurisdictional boundaries, stating: “For purposes of design review and environmental assessment, apply a standard of Level of Service E during peak hour conditions on *all streets in the City’s jurisdiction...*” (emphasis added) and that the City will “Strive to comply with the Level of Service standards and other performance measures on Routes of Regional Significance as defined by the County-wide Congestion Management Program.”

A2-2: This comment regarding adding a truck route map to the General Plan represents a comment on the proposed General Plan and not on the Draft EIR, and therefore does not require a response here. For information purposes, it should be noted, a truck route map was provided in an earlier working paper, published in July 2007 as part of the General Plan update process. See Figure 3-5 in “Land Use, Transportation, Environment, and Infrastructure” available on the City’s website:

http://www.lodi.gov/community_development/general_plan/reports.htm.

A2-3: The City acknowledges that future development projects may have impacts to the State highway system and, consistent with current City practice, future developments with

the potential to cause significant impacts would be subject to environmental review procedures, including preparation of a traffic impact study. Several General Plan policies are intended to ensure that appropriate reviews are applied. For example, Policy T-P1 ensures consistency between the timing of new development and the infrastructure needed to serve that development, and Policy T-P2 calls for project reviews to ensure that appropriate mitigations are identified and provided. Policy T-P3 commits the City to work collaboratively with San Joaquin County, San Joaquin Council of Governments, and Caltrans to successfully implement transportation improvements in the vicinity of Lodi.

- A2-4: The City acknowledges the importance of consistency between local and regional/State transportation plan and seeks to further reduce Impact 3.2-1, regarding plan consistency by modifying policy T-P3 to read as follows: Work collaboratively with San Joaquin County, San Joaquin Council of Governments, and Caltrans to maintain consistency with regional and State plans, and to successfully implement transportation improvements in the vicinity of Lodi.
- A2-5: The proposed Lodi General Plan presents population and employment projections, shown in Table ES-1 on page E-4. Although projections from the San Joaquin Council of Governments (SJCOG) were reviewed and consulted, the proposed General Plan's projections are based on calculations resulting from land use changes in the General Plan Land Use Diagram. The City acknowledges that projections by SJCOG are used as the foundation for the Regional Transportation Plan, Air Quality Conformity Analyses, traffic modeling, and other planning studies. The agency periodically updates its projections by—among other means—surveying local planning departments. The following proposed General Plan policy assures the City's cooperation:
- T-P6: Coordinate with the San Joaquin Council of Governments and actively participate in regional transportation planning efforts to ensure that the City's interests are reflected in regional goals and priorities.
- A2-6: The data reported in Table 3.1-2 on page 3.1-4 of the Draft EIR are provided by the California Department of Finance (DOF). DOF does not report a further breakdown of housing units, such as by square footage or the exact number of units in each development.
- A2-7: Table 3.2-1 on page 3.2-3 of the Draft EIR describes Level of Service thresholds and average daily traffic volumes for *typical* roadway types in Lodi. They do not refer to specific streets in the city. Rather they are devised through analysis of Transportation Research Board's Highway Capacity Manual, local factors and planning practice in Lodi and neighborhood jurisdictions, as described on page 3.2-2 of the Draft EIR.
- A2-8: As described on page 3.2-22 of the Draft EIR, the City of Lodi travel demand model was used to determine how the land uses in the proposed General Plan would generate vehicle trips and would contribute to future traffic volumes on the major streets throughout the planning area. A table has been added to page 3.2-22 of the Draft EIR

to display the trip generation rates used in the Lodi model for each land use category. See Table 4-1 and the trip generation table in Chapter 4 of this Final EIR.

- A2-9: The proposed General Plan has a 20-year horizon, through the year 2030, as described on page 2-10 of the Project Description in the Draft EIR. This is the horizon year for the future traffic volumes and levels of service described on page 3.2-15. A revision has been provided on page 3.2-15 of the Draft EIR to clarify this horizon year. See Table 4-1 of this Final EIR. Data on existing traffic volumes for State highway facilities was requested from the permanent count station database maintained by Caltrans HQ and was used directly in the General Plan analysis.
- A2-10: As described in the Physical Setting on page 3.2-1 of the Draft EIR, the study area for the transportation analysis is bound by the Mokelumne River to the north, ½ mile west of Lower Sacramento Road to the west, East Hogan Lane to the south, and the Central California Traction Railroad to the east. This area includes State Route 99, whose potential impacts are reported in Table 2.3-4, on page 3.2-21 of the Draft EIR. However, this study area does not include Interstate 5 located within five miles to the west of the city. Proposed General Plan policy T-P7 commits the City to work with the regional metropolitan transportation organization on regional transportation funding, including the update of regional transportation impact fees.

Page 3.2-24 of the Draft EIR describes the planned projects to widen SR 99 through Lodi that are referenced in this comment. As described in the Draft EIR, because those freeway widening projects do not have environmental clearance or identified funding, they cannot be assumed in the EIR analysis, but it is acknowledged that those projects would help to address the capacity shortfalls identified as a significant impact.

The City of Lodi has a transportation impact fee program to collect “fair share” contributions from new development projects. The fee program is referenced in General Plan policy T-P2, and the City’s commitment to update the fee program is included in General Plan policy T-P5. The City is willing to discuss with Caltrans the potential for expanding the transportation impact fee program to include contributions to State highway facility improvements. However, it should be noted that the future traffic volumes and Levels of Service on SR 99 described in the Draft EIR are the result of increased growth in Lodi combined with increased regional traffic demand (i.e., traffic that passes through Lodi but does not stop). Therefore, the “fair share” contribution toward SR 99 improvements from new development in Lodi may be a relatively small proportion of the overall cost of the improvements. In order for a revised impact fee program to be adopted, the likely sources of funding for the remainder of the improvement costs would need to be identified. The City will coordinate with Caltrans on this issue. A new policy will be added to the proposed General Plan:

- T-PNEW: Participate in discussions with Caltrans and neighboring jurisdictions to develop a fair-share fee program for improvements to regional routes and state highways. This fee should reflect traffic generated by individual municipalities and pass-through traffic.

A2-11: The Draft EIR was sent to the Air Resources Board.

A2-12: The proposed General Plan identifies a range of policies to improve mobility and maintain Level of Service standards, including suggestions recommended by the reviewer: access management, site design, and on-site development circulation. In addition to the City's Subdivision Ordinance, which specifies required street improvements for different types of development projects, these methods are exemplified by the following policies:

- T-P9: Design streets in new developments in configurations that generally match and extend the grid pattern of existing city streets. This is intended to disperse traffic and provide multiple connections to arterial streets. 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 lands develop or redevelop. In currently developed areas, the City may determine that improvements necessary to meet City standards are either infeasible or undesirable.
- T-P10: Maintain, and update as needed, roadway design standards to manage vehicle speeds and traffic volumes.
- CD-P14: Minimize pavement widths (curb-to-curb) along Mixed Use Corridors to prioritize pedestrian and bicycle movement, while ensuring adequate street width for traffic flow.
- CD-P34: Minimize curb cuts to expand pedestrian space and increase the supply of curbside parking. Methods include requiring abutting new developments to share a single access point from the road and allowing only one curb cut per parcel.
- CD-P35: Require new office development to be designed to address not just automobile access, but also potential for transit access, and allowing lunchtime pedestrian access to adjacent uses. Locate new office development along the street edge, with the main entrance facing the street. Parking should not be located between the street and building.

A2-13: The following policy in the proposed General Plan assures the City's continued cooperation with Caltrans and other agencies to make improvements that accommodate future growth:

- T-P3: Work collaboratively with San Joaquin County, San Joaquin Council of Governments, and Caltrans to successfully implement transportation improvements in the vicinity of Lodi.

A2-14: This comment regarding truck routes represents a comment on the proposed General Plan and not on the Draft EIR, and therefore does not require a response here. This issue is addressed in the response to comment A2-2 above.

A3: Public Utilities Commission

A3-1: The City appreciates the Public Utilities Commission's commitment to rail safety in California. The following proposed General Plan policies seek to assure the City's commitment to funding and implementing rail safety measures:

- T-P4: Maintain and update a Capital Improvements Program so that identified improvements are appropriately prioritized and constructed in a timely manner.
- T-P5: Update the local transportation impact fee program, consistent with General Plan projections and planned transportation improvements.
- T-P31: Coordinate with the California Public Utilities Commission to implement future railroad crossing improvements.
- T-P32: Require a commitment of funding for railroad crossing protection devices from private development requiring new railroad spurs.

A4: City of Stockton

A4-1: This comment regarding policies for Urban Reserve areas represents a comment on the proposed General Plan and not on the Draft EIR, and therefore does not require a response here. Notably, proposed General Plan policies ensure that the city expands only as needed and only when infrastructure has been provided:

- GM-P2EDIT: Target new growth into identified areas, extending south, west, and southeast. Ensure contiguous development by requiring development to conform to phasing described in Figure 3-1 [of the proposed General Plan]. Enforce phasing through permitting and infrastructure provision. Development may not extend to Phase 2 until Phase 1 has reached 75% of development potential, and development may not extend to Phase 3 until Phase 2 has reached 75% of development potential. In order to respond to market changes in the demand for various land use types, exemptions may be made to allow for development in future phases before these thresholds in the previous phase have been reached.
- GM-G2: Provide infrastructure—including water, sewer, stormwater, and solid waste/recycling systems—that is designed and timed to be consistent with projected capacity requirements and development phasing.
- GM-P8: Coordinate extension of sewer service, water service, and stormwater facilities into new growth areas concurrent with development phasing. Decline requests for extension of water and sewer lines beyond the city limit prior to the relevant development phase and approve development plans and water system extension only when a dependable and adequate water supply for the development is assured.

A4-2: This comment regarding the proposed General Plan's designation of an Armstrong Road Agricultural/Cluster Study Area represents a comment on the proposed General

Plan and not on the Draft EIR, and therefore does not require a response here. The City acknowledges that the City of Stockton has adopted an open space/agricultural land use along this northern boundary. For information purposes, more detail on the Armstrong Road Agricultural/Cluster Study Area is provided in Table 3-1 in the Growth Management Element of the proposed General Plan. This table describes potential policy tools, such as coordinating with other public agencies and avoiding uses that would diminish the agriculture/open space character of the greenbelt.

A4-3: This comment regarding the Armstrong Road Agricultural/Cluster Study Area represents a comment on the proposed General Plan and not on the Draft EIR, and therefore does not require a response here. However, for information purposes, we propose additional text in the proposed General Plan to describe the Armstrong Road Agricultural/Cluster Study Area, since it is shown on the Land Use Diagram:

- Armstrong Road Agricultural/Cluster Study Area: This overlay designation is intended to maintain a clear distinction between Lodi and Stockton. In coordination with relevant public agencies and property owners, the City will continue to study this designation area to determine a strategy to meet these objectives.

Notably, additional information and policy direction about the Study Area is described in the Growth Management Element of the proposed General Plan, as mentioned in the response to comment A4-2, above.

A4-4: A revision has been provided to page 3.2-21 of the Draft EIR to address this comment about traffic volumes and Level of Service on arterial roadways south of Harney Lane. See Table 4-1 of this Final EIR.

A4-5: Comments noted. The Draft EIR assesses potential impacts on the current staffing levels and facilities for police and fire protection. The City respectfully disagrees that it needs to provide response time standards. Instead, the proposed General Plan calls for establishing even more detailed thresholds to ensuring safety:

- GM-P22: Develop a Fire and Police Services Master Plan that would establish thresholds and requirements for fire and police facilities, staffing, and building features. The Fire and Police Services Master Plan should consider the following:
 - Typical nature and type of calls for service;
 - Fire prevention and mitigation measures, such as sprinklers, fire retardant materials, and alarms;
 - Appropriate measures for determining adequate levels of service; and
 - Locations and requirements for additional facilities and staffing.

A5: San Joaquin Council of Governments

A5-1: As the reviewer notes, although there are two public airports that lie within the city's Planning Area, the airports do not lie within the city limits and are therefore under San Joaquin County's jurisdiction. The City of Lodi will serve as the lead agency when it has

the primary responsibility for approving a project that may have a significant impact upon the environment.

A6: San Joaquin Council of Governments

- A6-1: The City acknowledges that, according to Government Code Section 65089.4, it will be required to prepare Deficiency Plan for roadway segments that are monitored as part of the Regional Congestion Management Program (RCMP) and which exceed the RCMP's stipulated Level of Service standard (currently LOS D), within 12 months of when the deficiency is identified.
- A6-2: The City acknowledges that RCMP roadway segments in Lodi that operate at the RCMP Level of Service standard (currently LOS D) will be required to prepare a plan that analyzes specific strategies for operational preservation and transportation demand management. The City further acknowledges that SJCOG is preparing a Regional Travel Demand Management Action Plan that will offer guidance for this requirement.
- A6-3: The City acknowledges that future projects in Lodi may be required to assess potential impacts on RCMP roadway segments within traffic impact analysis studies and/or environmental review documents, if the project generates 125 or more peak hour trips.

A7: San Joaquin County, Community Development Department

- A7-1: This comment regarding the Armstrong Road Agricultural/Cluster Study Area represents a comment on the proposed General Plan and not on the Draft EIR, and therefore does not require a response here. For further information about the Armstrong Road Agricultural/Cluster Study Area, see response to Letter A4, comment A4-3.

ORGANIZATIONS/INDIVIDUALS

B1: Jane Wagner-Tyack

- B1-1: This comment regarding the Lodi Urban Water Cycle graphic represents a comment on the proposed General Plan and not on the Draft EIR, and therefore does not require a response here. Notably, the sources of the water supply are documented on page 3.13-13 of the Draft EIR.
- B1-2: The City appreciates the reviewer's interest in ensuring an adequate water supply. Page 3.13-13 of the Draft EIR describes the potential increase in groundwater safe-yield, as the city grows and its land area increases. However, the proposed General Plan ensures that agricultural land will not be prematurely converted to urban uses in order to gain additional water supply. Proposed policies seek to ensure responsible growth that protects agricultural land and ensures that adequate infrastructure and water resources are in place before development can proceed:

- C-P3: Support the continuation of agricultural uses on lands designated for urban uses until urban development is imminent.
 - GM-G2: Provide infrastructure—including water, sewer, stormwater, and solid waste/recycling systems—that is designed and timed to be consistent with projected capacity requirements and development phasing.
 - GM-G3: Promote conservation of resources in order to reduce the load on existing and planned infrastructure capacity, and to preserve existing environmental resources.
 - GM-P2EDIT: Target new growth into identified areas, extending south, west, and southeast. Ensure contiguous development by requiring development to conform to phasing described in Figure 3-1 [of the proposed General Plan]. Enforce phasing through permitting and infrastructure provision. Development may not extend to Phase 2 until Phase 1 has reached 75% of development potential, and development may not extend to Phase 3 until Phase 2 has reached 75% of development potential. In order to respond to market changes in the demand for various land use types, exemptions may be made to allow for development in future phases before these thresholds in the previous phase have been reached.
 - GM-P7: Ensure that public facilities and infrastructure—including water supply, sewer, and stormwater facilities—are designed to meet projected capacity requirements to avoid the need for future replacement and upsizing, pursuant to the General Plan and relevant master planning.
 - GM-P8: Coordinate extension of sewer service, water service, and stormwater facilities into new growth areas concurrent with development phasing. Decline requests for extension of water and sewer lines beyond the city limit prior to the relevant development phase and approve development plans and water system extension only when a dependable and adequate water supply for the development is assured.
- B1-3: This comment supporting use of gray water or rainwater for non-potable uses represents a comment on the proposed General Plan and not on the Draft EIR, and therefore does not require a response here.
- B1-4: The Draft EIR makes interchangeable references to the San Francisco Bay-San Joaquin River Delta and the Delta. This full name and abbreviation are provided on page 3.7-1 of the Hydrology and Water Quality section.
- B1-5: A revision has been provided on page 3.7-1 of the Draft EIR to address this comment and proper spelling of the Camanche Reservoir. See Table 4-1 of this Final EIR.
- B1-6: A revision has been provided to page 7.2-4 of the Draft EIR to address this comment regarding groundwater basins. See Table 4-1 of this Final EIR.
- B1-7: During preparation of the Draft EIR, the analysis of potable water was revised to update projections from the most recent urban water management plan and other sources to reflect the development potential accommodated in the proposed General Plan Land Use Diagram. The water demand and supply analysis, presented in Impact

3.13-1, beginning on page 3.13-2, supersedes the proposed General Plan and identifies sufficient supply to meet demand during normal years. In dry years, demand is projected to exceed supply by approximately 4,040 acre-feet. However, growth management phasing, water conservation measures, recycled water, and graywater systems, are expected to bridge this gap. The proposed General Plan will be updated prior to adoption to reflect this updated analysis.

Relevant proposed General Plan policies that would ensure that a sufficient water supply is available to meet needs and that promote potable water conservation are identified in the impact statement, beginning on page 3.13-15. These policies include: GM-G2, GM-G3, GM-P7, GM-P8, GM-P9, GM-P10, GM-P11EDIT, GM-P12, GM-P13, GM-P14, and GM-P15EDIT. GM-P8 in particular ensures that development will not proceed until an adequate water supply has been identified:

- GM-P8: Coordinate extension of sewer service, water service, and stormwater facilities into new growth areas concurrent with development phasing. Decline requests for extension of water and sewer lines beyond the city limit prior to the relevant development phase and approve development plans and water system extension only when a dependable and adequate water supply for the development is assured.

B1-8: The City appreciates the reviewer's interest in ensuring water quality levels. The Draft EIR acknowledges existing wastewater deficiencies and an implementation program to meet existing and future demand. While the proposed General Plan will require new facilities to accommodate projected wastewater flows and required treatment capacity, it also identifies the infrastructure needed over the life of the Plan, and includes policies that require the provision of infrastructure in a timely manner. In fact, many of the required infrastructure improvements are already underway or are already part of existing master plans. In addition, project level environmental analysis will be required for any infrastructure development that could result in environmental impacts. Impact 3.13-2, beginning on page 3.13-17, identifies the relevant improvements and proposed General Plan policies that address this capacity issue. Moreover, the proposed General Plan also identifies policies to maintain and improve water quality levels in local and regional water bodies:

- C-P-26: Monitor water quality regularly to ensure that safe drinking water standards are met and maintained in accordance with State and EPA regulations and take necessary measures to prevent contamination. Comply with the requirements of the Clean Water Act with the intent of minimizing the discharge of pollutants to surface waters.
- C-P-27: Monitor the water quality of the Mokelumne River and Lodi Lake, in coordination with San Joaquin County, to determine when the coliform bacterial standard for contact recreation and the maximum concentration levels of priority pollutants, established by the California Department of Health Services, are exceeded. Monitor the presence of pollutants and variables that could cause harm to fish, wildlife, and plant species in the Mokelumne River and Lodi Lake. Post signs at areas used by water recreationists warning users of health risks whenever the coli-

form bacteria standard for contact recreation is exceeded. Require new industrial development to not adversely affect water quality in the Mokelumne River or in the area's groundwater basin. Control use of potential water contaminants through inventorying hazardous materials used in City and industrial operations.

- C-P-28: Regularly monitor water quality in municipal wells for evidence of contamination from dibromochloropropane (DBCP), saltwater intrusion, and other toxic substances that could pose a health hazard to the domestic water supply. Close or treat municipal wells that exceed the action level for DBCP.
- C-P-29: Minimize storm sewer pollution of the Mokelumne River and other waterways by maintaining an effective street sweeping and cleaning program.
- C-P-30: Require, as part of watershed drainage plans, Best Management Practices, to reduce pollutants to the maximum extent practicable.
- C-P-31: Require all new development and redevelopment projects comply with the post-construction Best Management Practices (BMPs) called for in the Stormwater Quality Control Criteria Plan, as outlined in the City's Phase 1 Stormwater NPDES permit issued by the California Water Quality Control Board, Central Valley Region. Require that owners, developers, and/or successors-in-interest to establish a maintenance entity acceptable to the City to provide funding for the operation, maintenance, and replacement costs of all post-construction BMPs.
- C-P-32: Require, as part of the City's Storm Water NPDES Permit and ordinances, the implementation of a Grading Plan, Erosion Control Plan, and Pollution Prevention Plan during the construction of any new development and redevelopment projects, to the maximum extent feasible.
- C-P-33: Require use of stormwater management techniques to improve water quality and reduce impact on municipal water treatment facilities.
- C-P-34: Protect groundwater resources by working with the county to prevent septic systems in unincorporated portions of the county that are in the General Plan Land Use Diagram, on parcels less than two acres.
- C-P-35: Reduce the use of pesticides, insecticides, herbicides, or other toxic chemical substances by households and farmers by providing education and incentives.

B1-9: The City appreciates the reviewer's support for potable water conservation and use of grey and recycled water. This comment does not raise environmental issues under CEQA.

B1-10: This comment does not raise environmental issues under CEQA. The Draft EIR represents a good faith effort to disclose all significant environmental effects of implementing the proposed General Plan, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the proposed Plan. Decision makers are required to use this informational document to make a decision about the Plan contents and adoption (CEQA Guidelines Section 15090).

B2: Herum/Crabtree Attorneys

- B2-1: This comment—discussing the PRR (Planned Residential Reserve) land use designation, which exists in the current General Plan—represents a comment on the existing and proposed General Plan and not on the Draft EIR, and therefore does not require a response here.
- B2-2: The reviewer is correct in saying that “an environmentally superior alternative does not need to match all the project objectives in order to be a viable alternative.” As described on page 4-20 of the Draft EIR, Alternative A was selected as the environmentally superior alternative for having the least environmental impact relative to the proposed General Plan and Alternative B, while meeting most project objectives.
- B2-3: The reviewer is correct that elements from two or more alternatives may be blended to create a new alternative and meet the two percent growth policy. However, the environmental impacts generally correlate with population and job projection estimates. Alternative A enjoys the benefits of lower vehicle miles traveled and greenhouse gas emissions compared with the proposed General Plan in part due to the fact that it results in fewer residents and jobs. Adding land area to accommodate the additional population to meet the two percent growth policy will result in additional environmental impacts, likely similar to those identified in the project.
- B2-4: As described on page 4-1 of the Draft EIR, according to CEQA Guidelines, the range of alternatives “shall include those that could feasibly accomplish *most* of the basic purposes of the project and could avoid or substantially lessen one or more of the significant impacts” (Section 15126.6(c)) (emphasis added). The project objectives, as described on page 2-4 of the Draft EIR, were synthesized during the planning process, as a result of input from community members, City staff, and decision makers. They articulate a vision for Lodi’s future in the next 20 years. When the City set out to define alternatives to the proposed General Plan, it had to balance the basic project objectives with opportunities for substantially lessening significant environmental effects.

The Draft EIR represents a good faith effort to disclose all significant environmental effects of implementing the proposed General Plan, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the proposed Plan. Decision makers ultimately decide on a preferred project, and prepare findings, facts in support of findings, and a statement of overriding considerations, as necessary, to support their decision.

B3: Bruce Fry

- B3-1: This comment, regarding the reviewer’s preference for Alternative A, does not raise environmental issues under CEQA; however, as a part of the public record, the City will take this comment into account in its decision on the proposed General Plan.
- B3-2: This comment—discussing the PRR (Planned Residential Reserve) land use designation, which exists in the current General Plan—represents a comment on the

existing and proposed General Plan and not on the Draft EIR, and therefore does not require a response here.

B3-3: The objectives of the proposed General Plan clarify the proposed growth pattern, as described on page 2-4 of the Draft EIR (emphasis added):

- **Objective #1: Compact Urban Form.** The Plan enhances Lodi's compact urban form, *promoting infill development* downtown and along key corridors, while also outlining growth possibilities directly adjacent to the existing urban edge. *The City's overall form will be squarish, reinforcing the centrality of downtown, with virtually all new development located within three miles from it.*
- **Objective #2: Mokelumne River as the City's Northern Edge.** The Lodi community has expressed a desire to see the river remain as the city's northern edge. The southern bank of the river (within the city) is occupied by residential uses and streets do not reach the river. Therefore, connectivity across the river to knit the urban fabric would be challenging if growth were to extend northward.
- **Objective #7: Agricultural Preservation Along Southern Boundary.** In order to *preserve agriculture and maintain a clear distinction between Lodi and Stockton*, the Plan acknowledges the Armstrong Road Agricultural/Cluster Study Area along the south edge of Lodi, from Interstate 5 (I-5) to State Route (SR) 99, and south to Stockton's Planning Area boundary.

The Land Use Diagram presented in Figure 2.3-1 on page 2-7 of the Draft EIR does depict urban development continuing south up to Hogan Lane, as the reviewer recommends, from Lower Sacramento Road on the west, past the Central California Traction Railroad to the east. However, it recommends stopping urban development at that boundary due to the reasons identified in the three objectives above.

B3-4: This comment, recommending that the area south of Harney Lane and north of Armstrong Road be designated as Urban Reserve, represents a comment on the proposed General Plan and not on the Draft EIR, and therefore does not require a response here.

B3-5: The water supply analysis presented on page 3.13-13 of the Draft EIR represents a good faith effort to evaluate the potential environmental effects of the proposed General Plan. The assumptions used are the best available and reflect existing knowledge and data. In the case of water supply, the analysis relies on the City's adopted 2005 Urban Water Management Plan (UWMP).

As described on page 3.13-13 of the Draft EIR, during dry years, the reliable water supply is estimated at 25,310 acre-feet. As a result, potential water shortage at full development could be 4,040 acre-feet in a dry year, meeting 86% of demand. The analysis on page 3.13-15 further concludes that because of recycled water supply opportunities, gray water and rain water catchment systems, and proposed General Plan policies that both restricts development until water supply is assured and promote

potable water conservation, supply will meet demand, making the potential impact less than significant.

A revision to page 3.13-15 of the Draft EIR (see Table 4-1 in Chapter 4 of this Final EIR) describes the City's Water Conservation Ordinance which further supports water conservation, enforces penalties when water is wasted, and permits the City to take additional conservation measures in the case of a water supply emergency. While the draft EIR does not evaluate scenarios where UWMP assumptions change, such as groundwater pumps malfunctioning, as hypothetically referenced by the reviewer, these revisions do explain the City's regulations during a water emergency situation.

- B3-6: Comment noted regarding a preference for the City to pursue surface water rather than groundwater sources and not on the Draft EIR, and therefore does not require a response here.
- B3-7: Comment noted regarding the reviewer seeking additional analysis of water demand. The demand analysis presented on page 3.13-12 of the Draft EIR represents the best effort to evaluate the potential environmental effects of the proposed General Plan. The assumptions used are the best available and reflect existing knowledge and data. The water analysis will be updated as part of the City's regular updating of its Urban Water Management Plan, as highlighted in policy GM-P10 of the proposed General Plan: "...The Urban Water Management Plan should be updated on a five year basis in compliance with State of California mandated requirements. Future plans should be developed in 2010, 2015, 2020, 2025, and 2030."
- B3-8: Comment noted regarding the reviewer seeking additional analysis of water quality. The potential impacts of the proposed General Plan in terms of water quality are identified in the impact analysis beginning on page 3.7-8 of the Draft EIR. Potential impacts are considered less than significant given the regulatory requirements and standards to which existing and future development must comply. Additionally, General Plan policies have been proposed to ensure potential environmental effects on water quality remain less than significant.
- B3-9: This comment, regarding the agricultural conservation program, represents a comment on the proposed General Plan and not on the Draft EIR, and therefore does not require a response here.

B4: Joseph L. Manassero

- B4-1: This comment—discussing the PRR (Planned Residential Reserve) land use designation—represents a comment on the existing and proposed General Plan and not on the Draft EIR, and therefore does not require a response here.
- B4-2: As described on page 4-20 of the Draft EIR, Alternative A was selected as the environmentally superior alternative for having the least environmental impact relative to the proposed General Plan and Alternative B, while meeting most project objectives. The reviewer is correct in saying that additional land area could be added to the east

and west of Alternative A in order to meet the two percent growth policy. However, the environmental impacts generally correlate with population and job projection estimates. Alternative A enjoys the benefits of lower vehicle miles traveled and greenhouse gas emissions compared with the proposed General Plan in part due to the fact that it results in fewer residents and jobs. Adding land area to accommodate the additional population to meet the two percent growth policy will result in additional environmental impacts, likely similar to those identified in the project.

B4-3: The City respectfully disagrees with the reviewer's comment. The Draft EIR is an informational document that represents a good faith effort to disclose all significant environmental effects of implementing the proposed General Plan. It identifies possible ways to minimize the significant effects and describes reasonable alternatives to the proposed Plan. It does not recommend the project nor any of the alternatives. Rather it is intended to assist the community in understanding potential impacts and ultimately to aid decision makers to decide on a preferred project, and prepare findings, facts in support of findings, and a statement of overriding considerations, as necessary, to support their decision.

B4-4: This comment, regarding the reviewer's preference for Alternative A, does not raise environmental issues under CEQA; however, as a part of the public record, the City will take this comment into account in its decision on the proposed General Plan.

B5: Catherine T. Manassero

B5-1: See Letter B4, response to comment B4-1.

B5-2: See Letter B4, response to comment B4-2.

B5-3: See Letter B4, response to comment B4-3.

B5-4: See Letter B4, response to comment B4-4.

B6: Michael J. Manassero

B6-1: See Letter B4, response to comment B4-1.

B6-2: See Letter B4, response to comment B4-2.

B6-3: See Letter B4, response to comment B4-3.

B6-4: See Letter B4, response to comment B4-4.

B7: Patricia M. Manassero

B7-1: See Letter B4, response to comment B4-1.

B7-2: See Letter B4, response to comment B4-2.

B7-3: See Letter B4, response to comment B4-3.

B7-4: See Letter B4, response to comment B4-4.

B8: Jack D. Ward

B8-1: The Environmental Impact Report does not recommend Alternative A nor does it recommend the proposed General Plan. The Draft EIR represents a good faith effort to disclose all significant environmental effects of implementing the proposed General Plan, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the proposed Plan. Decision makers may then use this informational document to make a decision about Plan contents and adoption.

B8-2: This comment, regarding the reviewer's preference for Alternative A, does not raise environmental issues under CEQA; however, as a part of the public record, the City will take this comment into account in its decision on the proposed General Plan.

B9: Joseph Kaehler

B9-1: See Letter B8, response to comment B8-1.

B9-2: See Letter B8, response to comment B8-2.

B10: Illegible name

B10-1: See Letter B8, response to comment B8-1.

B10-2: See Letter B8, response to comment B8-2.

B11: John Kaehler

B11-1: See Letter B8, response to comment B8-1.

B11-2: See Letter B8, response to comment B8-2.

B12: Illegible name

B12-1: See Letter B8, response to comment B8-1.

B12-2: See Letter B8, response to comment B8-2.

B13: Grace Puccinelli

B13-1: See Letter B8, response to comment B8-1.

B13-2: See Letter B8, response to comment B8-2.

B14: Illegible name

B14-1: See Letter B8, response to comment B8-1.

B14-2: See Letter B8, response to comment B8-2.

B15: Illegible name

B15-1: See Letter B8, response to comment B8-1.

B15-2: See Letter B8, response to comment B8-2.

B16: Douglass Manassero

B16-1: See Letter B8, response to comment B8-1.

B16-2: See Letter B8, response to comment B8-2.

B17: Illegible name

B17-1: See Letter B8, response to comment B8-1.

B17-2: See Letter B8, response to comment B8-2.

B18: Illegible name

B18-1: See Letter B8, response to comment B8-1.

B18-2: See Letter B8, response to comment B8-2.

B19: Illegible name

B19-1: See Letter B8, response to comment B8-1.

B19-2: See Letter B8, response to comment B8-2.

B20: Illegible name

B20-1: See Letter B8, response to comment B8-1.

B20-2: See Letter B8, response to comment B8-2.

B21: Illegible name

B21-1: See Letter B8, response to comment B8-1.

B21-2: See Letter B8, response to comment B8-2.

B22: Steve J. Borra Jr.

B22-1: See Letter B8, response to comment B8-1.

B22-2: See Letter B8, response to comment B8-2.

B23: Beverly Borra

B23-1: See Letter B8, response to comment B8-1.

B23-2: See Letter B8, response to comment B8-2.

B24: Lucille Borra

B24-1: See Letter B8, response to comment B8-1.

B24-2: See Letter B8, response to comment B8-2.

B25: Gary Tsutsumi

B25-1: See Letter B8, response to comment B8-1.

B25-2: See Letter B8, response to comment B8-2.

B26: Illegible name

B26-1: See Letter B8, response to comment B8-1.

B26-2: See Letter B8, response to comment B8-2.

B27: Illegible name

B27-1: See Letter B8, response to comment B8-1.

B27-2: See Letter B8, response to comment B8-2.

B28: Illegible name

B28-1: See Letter B8, response to comment B8-1.

B28-2: See Letter B8, response to comment B8-2.

B29: Illegible name

B29-1: See Letter B8, response to comment B8-1.

B29-2: See Letter B8, response to comment B8-2.

B30: Thomas Gooding

B30-1: See Letter B8, response to comment B8-1.

B30-2: See Letter B8, response to comment B8-2.

B31: Louise Gooding

B31-1: See Letter B8, response to comment B8-1.

B31-2: See Letter B8, response to comment B8-2.

B32: Illegible name

B32-1: See Letter B8, response to comment B8-1.

B32-2: See Letter B8, response to comment B8-2.

B33: Mike Mason

B33-1: See Letter B8, response to comment B8-1.

B33-2: See Letter B8, response to comment B8-2.

B34: Jake Diede

B34-1: See Letter B8, response to comment B8-1.

B34-2: See Letter B8, response to comment B8-2.

B35: Steven L. Diede

B35-1: See Letter B8, response to comment B8-1.

B35-2: See Letter B8, response to comment B8-2.

B36: Izzac Ramirez

B36-1: See Letter B8, response to comment B8-1.

B36-2: See Letter B8, response to comment B8-2.

B37: Robert Lee

B37-1: See Letter B8, response to comment B8-1.

B37-2: See Letter B8, response to comment B8-2.

ORAL TESTIMONY

C-1: Planning Commission Hearing on Draft EIR

Oral comments were heard at a Planning Commission public hearing on the Draft EIR, on December 9, 2009. Jane Wagner-Tyack voiced oral comments, but also provided the same comments in a letter. Responses to this letter, Letter B1, are provided above. All other comments heard represented comments on the proposed General Plan and did not raise environmental issues under CEQA and therefore will not be addressed in this response to comments on the Draft EIR.

4 Revisions to the Draft EIR

This chapter includes the revisions to the Draft EIR. These revisions have been made in response to comments or based on review by the EIR preparers. The revisions appear here in the order they appear in the Draft EIR. Text additions are noted in underline and text deletions appear in ~~strikeout~~.

The City may refine the proposed General Plan based upon agency and public comments. These changes will not alter the conclusions presented in the Draft EIR regarding significant environmental impacts or mitigation measures and therefore do not trigger recirculation. Revisions to the Draft EIR are described in Table 4-1 and organized by chapter, page and table or figure, where applicable. Certain revised pages (including revised figures) have been appended to the end of this chapter, for clarity purposes; these pages are referenced in the table.

Table 4-1: Revisions to the Draft EIR

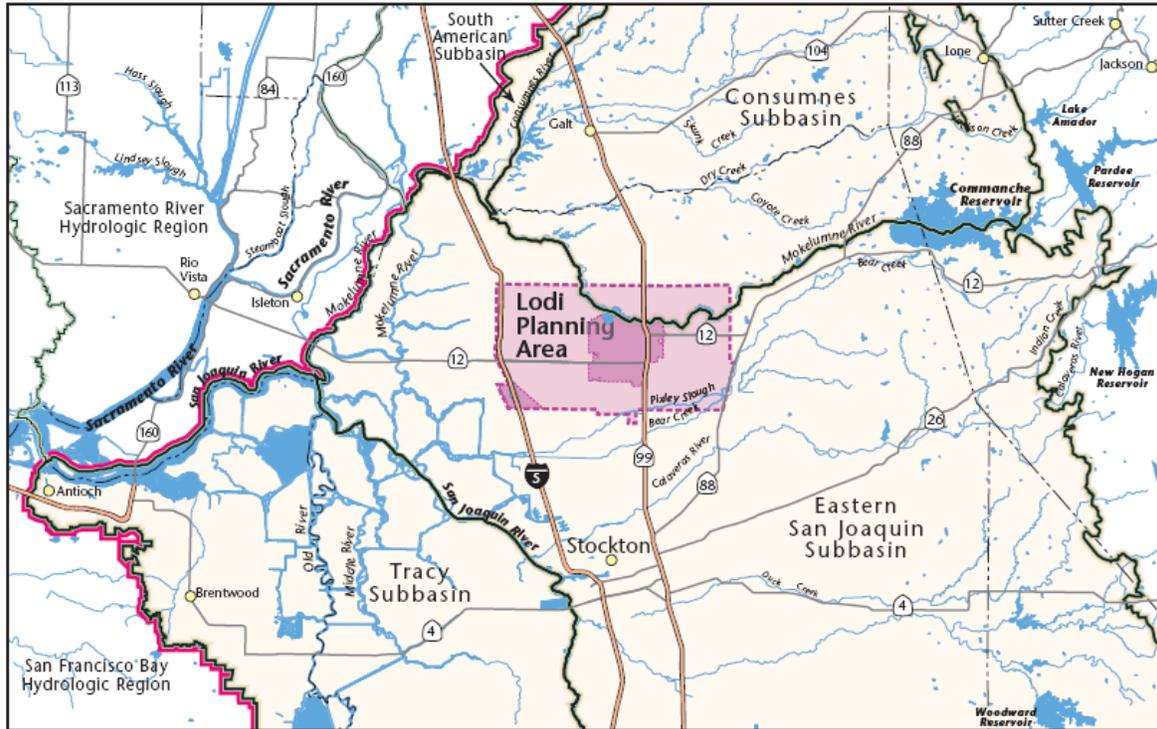
<i>Chapter/ Section</i>	<i>Page</i>	<i>Correction</i>
3.2	3.2-15	The second sentence of the first paragraph is amended as follows: Table 3.2-4 presents the existing and projected <u>(2030)</u> traffic volumes and LOS for individual roadway segments throughout the city.
3.2	3.2-21	Add paragraph following Table 3.2-4: <u>Future (2030) traffic volumes and LOS values were assessed for two additional north-south segments, between Harney Lane and Armstrong Road:</u> <ul style="list-style-type: none"> • <u>Lower Sacramento Rd: 24,500, LOS B</u> • <u>West Lane: 28,500, LOS D</u> <u>Existing daily traffic volumes and LOS were not assessed. These additional segments do not alter the conclusions presented in the Draft EIR regarding significant environmental impacts and therefore do not trigger recirculation</u>
3.2	3.2-22	The following text is added after the first paragraph of the Impact Methodology section. The referenced Table 3.2-4A may be found at this end of this chapter. <u>The traffic demand forecasting model summarizes land uses, street network, travel characteristics, and other key factors. Using these data, the model performs a series of calculations to determine the amount of trips generated, where each trip begins and ends, and the route taken by the trip. Trip generation is estimated by land use, using factors, as described in a new table, Table 3.2-4A. These trips are aggregated to determine daily traffic volumes and total vehicle trips in addition to other outcomes.</u>
3.7	3.7-1	The Comanche <u>Camanche</u> Reservoir is located on the Mokelumne River approximately 20 miles northeast of the Planning Area (City of Lodi, 1988; Department of Water Resources, 2006).
3.7-4		A second map is added to this page to show groundwater basins. This new map, Figure 7.2-1A is appended at the end of this section.
3.13-15		The following text is added after the third paragraph under the heading “Policies and Mitigations:”

Third, the City's Water Conservation Ordinance promotes water conservation by restricting water of landscaping to certain days and hours. (For example, odd numbered street addresses may only water landscaping on Wednesdays, Fridays and Sundays, and watering between May 1 and September 30, between 10AM and 6PM is prohibited.) The ordinance also specifies enforcement procedures, including sanctions for non-compliance. Most importantly, in relation to dry year scenarios, the ordinance also permits the City to place additional restrictions on water use in an emergency situation to manage water pressure and/or supply demands.

Table 3.2-4A: Daily Vehicle Trip Generation Rates

<i>Land Use Type</i>	<i>Units</i>	<i>Daily Trips Generated per Unit</i>
Residential		
Single Family	Dwelling Units	11
Multi-Family	Dwelling Units	7
Duplex	Dwelling Units	9
Mobile Home	Dwelling Units	4.99
Retirement Home	Thousand Square-feet	3.3
Non-Residential		
General Commercial/Shopping Center	Thousand Square-feet	45
Super Store	Thousand Square-feet	60
Downtown/Neighborhood Commercial	Thousand Square-feet	25
Office	Thousand Square-feet	15
Light Industrial	Thousand Square-feet	6.97
Heavy Industrial	Thousand Square-feet	1.7
Public Uses	Thousand Square-feet	1
High School	Students	1.71
Elementary & Junior High School	Students	1.29
Hotel	Rooms	8.92
Hospital	Thousand Square-feet	17.57
Highway Commercial	Thousand Square-feet	845.6

Source: City of Lodi Travel Demand Forecasting Model, Final Model Development Report, Fehr and Peers, February 2008.



- Hydrologic Region
- Groundwater Subbasin
- Waterway
- Lodi Planning Area
- Lodi City Limits

Figure 7.2-1A
**San Joaquin River
 Hydrologic Region and
 Groundwater Basins**

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RESOLUTION NO. 2010-21

A RESOLUTION OF THE LODI CITY COUNCIL CERTIFYING THE FINAL ENVIRONMENTAL IMPACT REPORT RELATING TO THE GENERAL PLAN; STATE CLEARINGHOUSE NO. 2009022075

=====

WHEREAS, California Government Code Section 65300 mandates that cities shall adopt a comprehensive, long-term general plan for the physical development of the City and of any land outside its boundaries, which in the City's judgment bears a relation to its planning; and

WHEREAS, the City Council initiated the comprehensive update to the City's General Plan on May 17, 2006, pursuant to Resolution No. 2006-94; and

WHEREAS, the Community Development Director made a determination that the update to the City's General Plan may have a potentially significant impact on the environment and ordered the preparation of an Environmental Impact Report (EIR); and

WHEREAS, the Notice of Preparation (NOP) of the Draft EIR (DEIR) was prepared and distributed to reviewing agencies on February 17, 2009; and

WHEREAS, the DEIR on the proposed General Plan (State Clearinghouse No. 2009022075) was released for circulation on November 25, 2009, for the statutorily mandated comment period of no less than 45-days; and

WHEREAS, the Planning Commission of the City of Lodi, after ten (10) days published notice, held a study session and public hearing on December 9, 2009. Public comments on the DEIR were taken at the hearing; and

WHEREAS, the City Council of the City of Lodi, after ten (10) days published notice, took public testimony on the DEIR on January 6, 2010; and

WHEREAS, written responses were prepared to all comments, oral and written, regarding the DEIR received during the public comment period; and

WHEREAS, a Final EIR (FEIR) responding to all public comments, oral and written, regarding the DEIR received during the public comment period was prepared and released to the public and commenting agencies on February 6, 2010; and

WHEREAS, on February 17, 2010, the City Council, after ten (10) days published notice, held a public hearing on the FEIR; and

WHEREAS, the City Council, after consideration of public testimony, voted to include a component of an Alternative B analyzed within the DEIR by adding a College Reserve placeholder to the General Plan; and

WHEREAS, the City Council independently reviewed, analyzed, and certified the FEIR; and

WHEREAS, the California Environmental Quality Act (CEQA) requires that, in connection with the approval of a project for which an EIR has been prepared, which identifies one or more significant effects, the decision-making agency make certain findings regarding those effects.

NOW, THEREFORE, BE IT RESOLVED, DETERMINED, AND ORDERED, as follows:

1. The foregoing recitals are true and correct and incorporated herein by reference.
2. THAT THE CITY COUNCIL hereby finds that full and fair public hearings have been held on the FEIR and the City Council having considered all comments received thereon, said FEIR is hereby determined to be adequate and complete; and said FEIR is hereby incorporated herein by reference.
3. THAT THE CITY COUNCIL hereby determines that the FEIR has been prepared in compliance with CEQA and the state and local environmental guidelines and regulations, that it has independently reviewed and analyzed the information contained therein, including the written comments received during the DEIR review period and the oral comments received at the public hearings, and that the FEIR represents the independent judgment of the City of Lodi as Lead Agency for the project.
4. THAT THE CITY COUNCIL does hereby find and recognize that the FEIR contains additions, clarifications, modifications, and other information in its responses to comments on the DEIR and also incorporates text changes to the DEIR based on information obtained from the City since the DEIR was issued. The City Council does hereby find and determine that such changes and additional information are not significant new information as that term is defined under the provisions of the CEQA because such changes and additional information do not indicate that any new significant environmental impacts not already evaluated would result from the proposed General Plan and they do not reflect any substantial increase in the severity of any environmental impact; no feasible mitigation measures considerably different from those previously analyzed in the DEIR have been proposed that would either lessen a significant environmental impact of the project or result in a new, substantial environmental impact; no feasible alternatives considerably different from those analyzed in the DEIR have been proposed that would lessen the significant environmental impacts of the project; and the DEIR was adequate. Accordingly, the City Council hereby finds and determines that recirculation of the Final EIR for further public review and comment is not warranted. (CEQA Guidelines §15088.5).
5. THAT THE CITY COUNCIL does hereby make the findings with respect to the significant effects on the environment resulting from the project, as identified in the FEIR, with the stipulation that (i) all information in these findings is intended as a summary of the full administrative record supporting the FEIR, which full administrative record is available for review through the Director of Community Development located in City Hall, 221 West Pine Street, Lodi, 95241, and (ii) any mitigation measures and/or alternatives that were suggested by the commentators on the DEIR and were not adopted as part of the FEIR are hereby expressly rejected for the reasons stated in the responses to comments set forth in the FEIR and elsewhere in the record. The significant and unavoidable impacts of the proposed General Plan as determined by the City are listed below. In addition, the findings and facts supporting the findings in connection therewith are listed. The following areas were discussed in the FEIR:

ENVIRONMENTAL IMPACTS OF THE GENERAL PLAN:

Summary of Impacts and Proposed General Policies that Reduce the Impact

#	Impact	Proposed General Policies that Reduce the Impact	Significance	Mitigation
3.1 Land Use and Housing				
3.1-1	The proposed General Plan would not physically divide any established communities and would increase connectivity locally and regionally.	NIA	Beneficial	NIA
3.1-2	The proposed General Plan would conflict with an applicable land use plan, policy, or regulation.	LU-P1, LU-P17, CD-P2, CD-P3, CD-P4, CD-P6, CD-P9, CD-P11, CD-P31, GM-P10	Less than Significant	None required
3.2 Traffic and Circulation				
3.2-1	The proposed General Plan would result in a substantial increase in vehicular traffic that would cause certain facilities to exceed level of service standards established by the governing agency.	T-G1, T-P1, T-P2, T-P3, T-P4, T-PNEW, T-NEW, T-P8, T-NEW, T-P9, T-P10, T-P13, T-P14, T-P15, T-P16, T-P17, T-P18, T-P19, T-P20, T-P22, T-P24, T-P25, T-P27, T-P-28, T-P29, T-P43, T-P44, T-P45	Significant and Unavoidable	No feasible mitigation is currently available.
3.2-2	The proposed General Plan may adversely affect emergency access.	T-P1, T-P2, T-P8, T-P9, T-P10	Significant and Unavoidable	No mitigation measures are feasible.
3.2-3	The proposed General Plan may conflict with adopted policies, plans, or programs supporting alternative transportation modes.	T-G1, T-P8, T-P9, T-P10, T-P13, T-P14, T-P15, T-P16, T-P17, T-P18, T-P19, T-P20, T-P22, T-P24, T-P25, T-P27, T-P28, T-P29, T-P43, T-P44, T-P45, T-G2, T-G3, T-G4, T-G5, T-P11, T-P12, T-P21, T-P23, T-P26, T-P30, T-P38, T-P39	Significant and Unavoidable	No feasible mitigation is currently available.
3.3 Agriculture and Soil Resources				
3.3-1	Build out of the proposed General Plan would convert substantial amounts of Important Farmland to non-agricultural use.	C-G1, C-G2, C-P1, C-P2, C-P3, C-P4, C-P5, C-P6, C-P7, C-P8, GM-G1, GM-P2	Significant and Unavoidable	Not directly mitigable aside from preventing development altogether
3.3-2	Build out of the proposed General Plan would result in potential land use incompatibilities with sites designated for continued agriculture use.	C-P1, C-P2, C-P3, C-P4, C-P5, C-P6, C-P7, C-P8, GM-G1, GM-P2, CD-G1	Less than Significant	None required
3.4 Biological Resources				
3.4-1	Build out of the proposed General Plan could have a substantial adverse effect, either directly or through habitat modifications, on special status and/or common species.	C-P9, C-P10, C-P11, C-P12, C-P13, C-P14, C-P15, C-P16, C-P32, P-P9, P-P10, P-P11, P-P12	Less than Significant	None required
3.4-2	Build out of the proposed General Plan	C-P9, C-P10, C-P11, C-P12, C-	Less than	None required

Summary of Impacts and Proposed General Policies that Reduce the Impact

#	Impact	Proposed General Policies that Reduce the Impact	Significance	Mitigation
	could have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service.	P13, C-P14, C-P15, C-P16, C-P32, P-P9, P-P10, P-P11, P-P12	Significant	
3.4-3	Build out of the proposed General Plan could 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, etc.).	C-P9, C-P10, C-P11, C-P12, C-P13, C-P14, C-P15, C-P16, C-P32, P-P9, P-P10, P-P11, P-P12	Less than Significant	None required
3.4-4	Build out of the proposed General Plan could 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	C-P9, C-P10, C-P11, C-P12, C-P13, C-P14, C-P15, C-P16, C-P32, P-P9, P-P10, P-P11, P-P12	Less than Significant	None required
3.5 Cultural Resources				
3.5-1	Build out of the proposed General Plan may alter a historic resource.	CD-P10, C-G6, C-G7, C-P20, C-P21, C-P22, C-P23, C-P24, C-P25	Less than Significant	None required
3.5-2	Build out of the proposed General Plan could disrupt or adversely affect a prehistoric or historic archeological, paleontological, or culturally significant site.	C-G5, C-G6, C-P17, C-P18, C-P19	Less than Significant	None required
3.6 Climate Change and Greenhouse Gases				
3.6-1	Implementation of the proposed General Plan would increase total carbon dioxide equivalent emissions in Lodi, compared to existing conditions.	LU-G1, LU-G2, LU-G3, LU-G4, LU-G5, LU-G6, LU-G7, LU-G8, LU-G9, LU-G10, LU-G11, LU-G12, LU-G13, LU-G14, LU-G15, LU-G16, LU-G17, LU-G18, LU-G19, LU-G20, LU-G21, LU-G22, LU-G23, LU-G24, LU-G25, LU-G26, LU-G27, LU-G28, LU-G29, LU-G30, LU-G31, LU-G32, LU-G33, LU-G34, LU-G35, LU-G36, LU-G37, LU-G38, LU-G39, LU-G40, LU-G41, LU-G42, LU-G43, LU-G44, LU-G45, LU-G46, LU-G47, LU-G48, LU-G49, LU-G50, LU-G51, LU-G52, LU-G53, LU-G54, LU-G55, LU-G56, LU-G57, LU-G58, LU-G59, LU-G60, LU-G61, LU-G62, LU-G63, LU-G64, LU-G65, LU-G66, LU-G67, LU-G68, LU-G69, LU-G70, LU-G71, LU-G72, LU-G73, LU-G74, LU-G75, LU-G76, LU-G77, LU-G78, LU-G79, LU-G80, LU-G81, LU-G82, LU-G83, LU-G84, LU-G85, LU-G86, LU-G87, LU-G88, LU-G89, LU-G90, LU-G91, LU-G92, LU-G93, LU-G94, LU-G95, LU-G96, LU-G97, LU-G98, LU-G99, LU-G100, LU-G101, LU-G102, LU-G103, LU-G104, LU-G105, LU-G106, LU-G107, LU-G108, LU-G109, LU-G110, LU-G111, LU-G112, LU-G113, LU-G114, LU-G115, LU-G116, LU-G117, LU-G118, LU-G119, LU-G120, LU-G121, LU-G122, LU-G123, LU-G124, LU-G125, LU-G126, LU-G127, LU-G128, LU-G129, LU-G130, LU-G131, LU-G132, LU-G133, LU-G134, LU-G135, LU-G136, LU-G137, LU-G138, LU-G139, LU-G140, LU-G141, LU-G142, LU-G143, LU-G144, LU-G145, LU-G146, LU-G147, LU-G148, LU-G149, LU-G150, LU-G151, LU-G152, LU-G153, LU-G154, LU-G155, LU-G156, LU-G157, LU-G158, LU-G159, LU-G160, LU-G161, LU-G162, LU-G163, LU-G164, LU-G165, LU-G166, LU-G167, LU-G168, LU-G169, LU-G170, LU-G171, LU-G172, LU-G173, LU-G174, LU-G175, LU-G176, LU-G177, LU-G178, LU-G179, LU-G180, LU-G181, LU-G182, LU-G183, LU-G184, LU-G185, LU-G186, LU-G187, LU-G188, LU-G189, LU-G190, LU-G191, LU-G192, LU-G193, LU-G194, LU-G195, LU-G196, LU-G197, LU-G198, LU-G199, LU-G200, LU-G201, LU-G202, LU-G203, LU-G204, LU-G205, LU-G206, LU-G207, LU-G208, LU-G209, LU-G210, LU-G211, LU-G212, LU-G213, LU-G214, LU-G215, LU-G216, LU-G217, LU-G218, LU-G219, LU-G220, LU-G221, LU-G222, LU-G223, LU-G224, LU-G225, LU-G226, LU-G227, LU-G228, LU-G229, LU-G230, LU-G231, LU-G232, LU-G233, LU-G234, 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LU-G457, LU-G458, LU-G459, LU-G460, LU-G461, LU-G462, LU-G463, LU-G464, LU-G465, LU-G466, LU-G467, LU-G468, LU-G469, LU-G470, LU-G471, LU-G472, LU-G473, LU-G474, LU-G475, LU-G476, LU-G477, LU-G478, LU-G479, LU-G480, LU-G481, LU-G482, LU-G483, LU-G484, LU-G485, LU-G486, LU-G487, LU-G488, LU-G489, LU-G490, LU-G491, LU-G492, LU-G493, LU-G494, LU-G495, LU-G496, LU-G497, LU-G498, LU-G499, LU-G500, LU-G501, LU-G502, LU-G503, LU-G504, LU-G505, LU-G506, LU-G507, LU-G508, LU-G509, LU-G510, LU-G511, LU-G512, LU-G513, LU-G514, LU-G515, LU-G516, LU-G517, LU-G518, LU-G519, LU-G520, LU-G521, LU-G522, LU-G523, LU-G524, LU-G525, LU-G526, LU-G527, LU-G528, LU-G529, LU-G530, LU-G531, LU-G532, LU-G533, LU-G534, LU-G535, LU-G536, LU-G537, LU-G538, LU-G539, LU-G540, LU-G541, LU-G542, LU-G543, LU-G544, LU-G545, LU-G546, LU-G547, LU-G548, LU-G549, LU-G550, LU-G551, LU-G552, LU-G553, LU-G554, LU-G555, LU-G556, LU-G557, LU-G558, LU-G559, LU-G560, LU-G561, LU-G562, LU-G563, LU-G564, LU-G565, LU-G566, LU-G567, LU-G568, LU-G569, LU-G570, LU-G571, LU-G572, LU-G573, LU-G574, LU-G575, LU-G576, LU-G577, LU-G578, LU-G579, LU-G580, LU-G581, LU-G582, LU-G583, LU-G584, LU-G585, LU-G586, LU-G587, LU-G588, LU-G589, LU-G590, LU-G591, LU-G592, LU-G593, LU-G594, LU-G595, LU-G596, LU-G597, LU-G598, LU-G599, LU-G600, LU-G601, LU-G602, LU-G603, LU-G604, LU-G605, LU-G606, LU-G607, LU-G608, LU-G609, LU-G610, LU-G611, LU-G612, LU-G613, LU-G614, LU-G615, LU-G616, LU-G617, LU-G618, LU-G619, LU-G620, LU-G621, LU-G622, LU-G623, LU-G624, LU-G625, LU-G626, LU-G627, LU-G628, LU-G629, LU-G630, LU-G631, LU-G632, LU-G633, LU-G634, LU-G635, LU-G636, LU-G637, LU-G638, LU-G639, LU-G640, LU-G641, LU-G642, LU-G643, LU-G644, LU-G645, LU-G646, LU-G647, LU-G648, LU-G649, LU-G650, LU-G651, LU-G652, LU-G653, LU-G654, LU-G655, LU-G656, LU-G657, LU-G658, LU-G659, LU-G660, LU-G661, LU-G662, LU-G663, LU-G664, LU-G665, LU-G666, LU-G667, LU-G668, LU-G669, LU-G670, LU-G671, LU-G672, LU-G673, LU-G674, LU-G675, LU-G676, LU-G677, LU-G678, LU-G679, LU-G680, LU-G681, LU-G682, LU-G683, LU-G684, LU-G685, LU-G686, LU-G687, LU-G688, LU-G689, LU-G690, LU-G691, LU-G692, LU-G693, LU-G694, LU-G695, LU-G696, LU-G697, LU-G698, LU-G699, LU-G700, LU-G701, LU-G702, LU-G703, LU-G704, LU-G705, LU-G706, LU-G707, LU-G708, LU-G709, LU-G710, LU-G711, LU-G712, LU-G713, LU-G714, LU-G715, LU-G716, LU-G717, LU-G718, LU-G719, LU-G720, LU-G721, LU-G722, LU-G723, LU-G724, LU-G725, LU-G726, LU-G727, LU-G728, LU-G729, LU-G730, LU-G731, LU-G732, LU-G733, LU-G734, LU-G735, LU-G736, LU-G737, LU-G738, LU-G739, LU-G740, LU-G741, LU-G742, LU-G743, LU-G744, LU-G745, LU-G746, LU-G747, LU-G748, LU-G749, LU-G750, LU-G751, LU-G752, LU-G753, LU-G754, LU-G755, LU-G756, LU-G757, LU-G758, LU-G759, LU-G760, LU-G761, LU-G762, LU-G763, LU-G764, LU-G765, LU-G766, LU-G767, LU-G768, LU-G769, LU-G770, LU-G771, LU-G772, LU-G773, LU-G774, LU-G775, LU-G776, LU-G777, LU-G778, LU-G779, LU-G780, LU-G781, LU-G782, LU-G783, LU-G784, LU-G785, LU-G786, LU-G787, LU-G788, LU-G789, LU-G790, LU-G791, LU-G792, LU-G793, LU-G794, LU-G795, LU-G796, LU-G797, LU-G798, LU-G799, LU-G800, LU-G801, LU-G802, LU-G803, LU-G804, LU-G805, LU-G806, LU-G807, LU-G808, LU-G809, LU-G810, LU-G811, LU-G812, LU-G813, LU-G814, LU-G815, LU-G816, LU-G817, LU-G818, LU-G819, LU-G820, LU-G821, LU-G822, LU-G823, LU-G824, LU-G825, LU-G826, LU-G827, LU-G828, LU-G829, LU-G830, LU-G831, LU-G832, LU-G833, LU-G834, LU-G835, LU-G836, LU-G837, LU-G838, LU-G839, LU-G840, LU-G841, LU-G842, LU-G843, LU-G844, LU-G845, LU-G846, LU-G847, LU-G848, LU-G849, LU-G850, LU-G851, LU-G852, LU-G853, LU-G854, LU-G855, LU-G856, LU-G857, LU-G858, LU-G859, LU-G860, LU-G861, LU-G862, LU-G863, LU-G864, LU-G865, LU-G866, LU-G867, LU-G868, LU-G869, LU-G870, LU-G871, LU-G872, LU-G873, LU-G874, LU-G875, LU-G876, LU-G877, LU-G878, LU-G879, LU-G880, LU-G881, LU-G882, LU-G883, LU-G884, LU-G885, LU-G886, LU-G887, LU-G888, LU-G889, LU-G890, LU-G891, LU-G892, LU-G893, LU-G894, LU-G895, LU-G896, LU-G897, LU-G898, LU-G899, LU-G900, LU-G901, LU-G902, LU-G903, LU-G904, LU-G905, LU-G906, LU-G907, LU-G908, LU-G909, LU-G910, LU-G911, LU-G912, LU-G913, LU-G914, LU-G915, LU-G916, LU-G917, LU-G918, LU-G919, LU-G920, LU-G921, LU-G922, LU-G923, LU-G924, LU-G925, LU-G926, LU-G927, LU-G928, LU-G929, LU-G930, LU-G931, LU-G932, LU-G933, LU-G934, LU-G935, LU-G936, LU-G937, LU-G938, LU-G939, LU-G940, LU-G941, LU-G942, LU-G943, LU-G944, LU-G945, LU-G946, LU-G947, LU-G948, LU-G949, LU-G950, LU-G951, LU-G952, LU-G953, LU-G954, LU-G955, LU-G956, LU-G957, LU-G958, LU-G959, LU-G960, LU-G961, LU-G962, LU-G963, LU-G964, LU-G965, LU-G966, LU-G967, LU-G968, LU-G969, LU-G970, LU-G971, LU-G972, LU-G973, LU-G974, LU-G975, LU-G976, LU-G977, LU-G978, LU-G979, LU-G980, LU-G981, LU-G982, LU-G983, LU-G984, LU-G985, LU-G986, LU-G987, LU-G988, LU-G989, LU-G990, LU-G991, LU-G992, LU-G993, LU-G994, LU-G995, LU-G996, LU-G997, LU-G998, LU-G999, LU-G1000	Overall Significant Cumulative Impact, Project Contribution Cumulatively Considerable	No feasible mitigation measures are currently available
3.6-2	Build out of the proposed General Plan could result in a substantial increase in per	LU-G1, LU-G2, LU-G3, LU-G4, LU-G5, LU-G6, LU-G7, LU-G8, LU-G9, LU-G10, LU-G11, LU-G12, LU-G13, LU-G14, LU-G15, LU-G16, LU-G17, LU-G18, LU-G19, LU-G20, LU-G21, LU-G22, LU-G23, LU-G24, LU-G25, LU-G26, LU-G27, LU-G28, LU-G29, LU-G30, LU-G31, LU-G32, LU-G33, LU-G34, LU-G35, LU-G36, LU-G37, LU-G38, LU-G39, LU-G40, LU-G41, LU-G42, LU-G43, LU-G44, LU-G45, LU-G46, LU-G47, LU-G48, LU-G49, LU-G50, LU-G51, LU-G52, LU-G53, LU-G54, LU-G55, LU-G56, LU-G57, LU-G58, LU-G59, LU-G60, LU-G61, LU-G62, LU-G63, LU-G64, LU-G65, LU-G66, LU-G67, LU-G68, LU-G69, LU-G70, LU-G71, LU-G72, LU-G73, LU-G74, LU-G75, LU-G76, LU-G77, LU-G78, LU-G79, LU-G80, LU-G81, LU-G82, LU-G83, LU-G84, LU-G85, LU-G86, LU-G87, LU-G88, LU-G89, LU-G90, LU-G91, LU-G92, LU-G93, LU-G94, LU-G95, LU-G96, LU-G97, LU-G98, LU-G99, LU-G100	Less than	None required

Summary of Impacts and Proposed General Policies that Reduce the Impact

#	Impact	Proposed General Policies that Reduce the Impact	Significance	Mitigation
	capita energy consumption in the city which would suggest more wasteful, inefficient, or unnecessary consumption of energy.	P18, LU-P25, LU-P26, LU-P27, GM-G1, GM-G2, GM-G3, GM-P1, GM-P2, GM-P3, GM-P4, GM-P6, CD-G1, CD-P1, CD-G-4, CD-G-5, CD-P31, CD-P21, CD-P24, T-G2, T-G4, T-P13, T-P14, T-P15, T-P16, T-P17, T-P18, T-P19, T-P23, T-P25, T-P28, T-P29, GM-P11, GM-P13, GM-P14, GM-P15, CD-G8, CD-G9, CD-P38, CD-P39, CD-P40, CD-P32, C-P39, C-PNEW, C-PNEW, C-P37, C-P38, C-P40, C-P42, GM-P19, CD-P15, CD-P16, CD-P19, C-P43, C-P44, C-P45, C-P41, C-G9, C-G10, C-P36, T-G8, T-P43, T-P44, T-P45, GM-P17, GM-P18	Significant	
37 Hydrology and Water Quality				
3.7-1	Build out of the proposed General Plan could alter existing drainage patterns of the area in a manner which would result in substantial erosion or siltation on- or offsite or increase sediment loads thereby affecting water quality, but this impact would be mitigated by existing State and local regulations and proposed General Plan policies.	C-P-26, C-P-27, C-P-28, C-P-29, C-P-30, C-P-31, C-P-32, C-P-33, c-P-34, c-P-35	Less than Significant	None required
3.7-2	Implementation of the proposed General Plan would may result in increased nonpoint source pollution entering storm water runoff and entering the regional storm drain system or surrounding water resources (from either construction or long-term development), but this impact would be mitigated by existing State and local regulations and proposed General Plan policies.	C-P-26, C-P-27, C-P-28, C-P-29, C-P-30, C-P-31, C-P-32, C-P-33, C-P-34, C-P-35	Less than Significant	None required
38 Air Quality				
3.8-1	Implementation of the proposed General Plan could result in a cumulatively considerable net increase of criteria pollutants which may conflict with or violate an applicable air quality plan, air quality standard or contribute substantially to an existing or projected air quality violation.	C-P46, C-P47, C-P48, C-P49, C-P50, C-P51, C-P52, C-P53, C-P54, C-P55, C-P56, C-P57, T-G4, T-G5, T-P14, T-P15, T-P16, T-P17, T-P18, T-P19, T-P20, T-P21, T-P22, T-P23, T-P24, T-P25, T-P26, T-P27, T-P28, T-P29, T-P38, T-P39, T-P43, T-P44, T-P45	Significant and Unavoidable	No feasible mitigation measures are currently available.
3.8-2	Build out of the proposed General Plan could expose sensitive receptors to	C-P46, C-P47, C-P48, C-P49, C-P50, C-P51, C-P52, C-P53, C-P54,	Significant and Unavoidable	No feasible mitigation

Summary of Impacts and Proposed General Policies that Reduce the Impact

#	Impact	Proposed General Policies <i>that</i> Reduce the Impact	Significance	Mitigation
	substantial pollutant concentrations.	C-P55, C-P56, C-P57, T-G4, T-G5, T-P14, T-P15, T-P16, T-P17, T-P18, T-P19, T-P20, T-P21, T-P22, T-P23, T-P24, T-P25, T-P26 T-P27, T-P28 T-P29, T-P38, T-P39, T-P43, T-P44. T-P45		measures are currently available.
3.9 Flood Hazards				
3.9-1	Build out of the proposed General Plan could expose people or structures to a risk of loss , injury or death involving flooding, including flooding as a result of the failure of a levee or dam.	S-P1, S-P2, S-P4, S-P5, S-P6, S-P7, SPNEW, SPNEW	Less than Significant	None required
3.10 Seismic and Geologic Hazards				
3.10-1	Implementation of the proposed General Plan has low to moderate potential to expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death resulting from rupture of a known earthquake fault, ground shaking, landslides or liquefaction, though these risks are minimized through compliance with State regulations and proposed General Plan policies.	S-P16, S-P17, S-P18, S-P19, S-P20	Less than Significant	None required
3.10-2	Implementation of the proposed General Plan has moderate potential to result in substantial soil erosion or unstable soil conditions from excavation, grading or fill, though impacts would be mitigated with proposed General Plan policies.	S-P16, S-P17, S-P18, S-P19, S-P20	Less than Significant	None required
3.10-3	Implementation of the proposed General Plan has low potential to expose people or structures to potential substantial adverse effects, including the risk of loss , injury, or death resulting from settlement and/or subsidence of the land, or risk of expansive soils, and policies in the proposed General Plan would further mitigate this impact.	S-P16, S-P17, S-P18, S-P19, S-P20	Less than Significant	None required
3.11 Noise				
3.11-1	Implementation of the proposed General Plan could result in a substantial permanent increase in ambient noise levels.	N-P1, N-P2, N-P3 N-P4, N-P5, N-P6, N-P7, N-P8, N-P9, N-P10, N-PNEW	Significant and Unavoidable	No feasible mitigation measures are currently available.
3.11-2	New development in the proposed General Plan would potentially expose existing noise-sensitive uses to construction-related temporary increases in ambient noise.	N-PNEW, N-PNEW	Less than Significant	None required
3.11-3	New development in the proposed General Plan could cause the exposure of	N-P1, N-P2, N-P3 N-P4, N-P5, N-P6, N-P7, N-P8, N-P9, N-P10, N-	Less than Significant	None required

Summary of Impacts and Proposed General Policies that Reduce the Impact

#	Impact	Proposed General Policies that Reduce the <i>Impact</i>	Significance	Mitigation
	persons to or generation of excessive ground borne vibration or ground borne noise levels.	PNEW, N-PNEW, N-PNEW		
3.12 Hazardous Materials, and Toxics				
3.12-1	Implementation of the proposed General Plan has the potential to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, though existing federal, State, and local regulations and proposed General Plan policies would sufficiently reduce the impact.	SP8, SP9, S-PI OA , S-PI OB , S-PI I , S-PI2, S-PI3, S-PI 4 , S-PI5, S-PI8, S-P22, S-P23, S-P24, S-P25	Less than Significant	None required
3.12-2	Implementation of the proposed General Plan has the potential to locate land uses on sites which are included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, could create a significant hazard to the public or the environment.	SP8, SP9, S-PI OA , S-PI OB , S-PI I , S-PI2, S-PI3, S-PI 4 , S-PI5, S-PI8, S-P22, S-P23, S-P24, S-P25	Less than Significant	None required
3.12-3	Implementation of the proposed General Plan has the potential to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	S-P8, S-P9, S-PI OA , S-PI OB , S-PI I , S-PI2, S-PI3, S-PI 4 , S-PI5, S-P18, S-P22, S-P23, S-P24, S-P25	Less than Significant	None required
3.12-4	Implementation of the proposed General Plan has the potential to result in the handling of hazardous materials or wastes within one-quarter mile of an existing or proposed school or other sensitive use.	S-P8, S-P9, S-PI OA , S-PI OB , S-PI I , S-PI2, S-PI3, S-PI 4 , S-PI5, S-PI8, S-P22, S-P23, S-P24, S-P25	Less than Significant	None required
3.13 Infrastructure				
3.13-1	New development under the proposed General Plan would increase the demand for water beyond projections in the Lodi Urban Water Management Plan.	GM-G2, GM-G3, GM-P7, GM-P8, GM-P9, GM-PI0, GM-PI I , GM-P12, GM-PI3, GM-PI 4 , GM-PI5, GM-PI6, GM-PI7, GM-PI8	Less than Significant	None required
3.13-2	New development under the proposed General Plan may exceed wastewater treatment capacity of existing infrastructure.	GM-G2, GM-G3, GM-P7, GM-P8, GM-P9, GM-PI0	Less than Significant	None required
3.13-3	New development under the proposed General Plan would cause an increase in waste generation.	GM-PI9, C-PNEW	Less than Significant	None required
3.14 Public Facilities				
3.14-	New development under the proposed	GM-NEW, GM-NEW, GM-NEW,	Less than	None required

Summary of Impacts and Proposed General Policies that Reduce the Impact

#	Impact	Proposed General Policies that Reduce the Impact	Significance	Mitigation
1	Lodi General Plan will increase the demand for school facilities.	GM-P20	Significant	
3.14-2	New development in the proposed General Plan requires police and fire protection services that exceed current staffing and facilities.	GM-G4, GM-P22, GM-P23, S-P22, S-P23, S-P24, S-P25	Less than Significant	None required
3.15 Parks and Recreation				
3.15-1	Future development as a result of the proposed General Plan may result in failure to meet all of the City's park standard goals and increase the use of existing parks and recreation facilities, which would accelerate physical deterioration.	P-G3, P-PI, P-P3, P-P5, P-P7, P-PI9, P-P20	Less than Significant	None required
3.15-2	Implementation of the proposed General Plan would result in increased accessibility of parks and recreation facilities from residential neighborhoods.	P-G3, P-PI, P-P3, P-P5, P-P7, P-PI9, P-P20	Beneficial	NIA
3.16 Visual Resources				
3.16-1	Future proposed development in Lodi has the potential to affect scenic vistas within the Planning Area	CD-P20, CD-P22, CD-P23	Less than Significant	None required
3.16-2	New development and redevelopment activities have the potential to change Lodi's visual character, particularly where incompatibilities with existing development in scale and/or character may exist.	CD-G1, CD-G2, CD-G3, CD-G6, CD-G7, CD-P2, CD-P3, CD-P4, CD-P5, CD-P6, CD-P7, CD-P8, CD-PI0, CD-PI1, CD-PI2, CD-PI5, CD-PI6, CD-PI7, CD-PI8, CD-PI9, CD-P24, CD-P26, CD-P28, CD-P29, CD-P30, CD-P31, CD-P32, CD-P34, GM-G1, GM-PI, GM-P2, C-P20, C-P23, C-P24	Less than Significant	None required
3.16-3	Development under the proposed General Plan has the potential to adversely affect visual resources in the short-term during periods of construction by blocking or disrupting views.	None	Less than Significant	None required
3.16-4	Development under the proposed General Plan has the potential to create new sources of light or glare which would adversely affect day or nighttime views in the area.	CD-P33	Less than Significant	None required

FINDINGS REGARDING IMPACTS REDUCED TO A LESS THAN SIGNIFICANT LEVEL:

Based upon the FEIR and the entire record the City Council finds that the mitigation measures and proposed General Plan policies identified above are feasible and will be required in, or incorporated into, the proposed General Plan. These mitigation measures will reduce the impact to a less than significant level except as otherwise noted.

FINDINGS REGARDING GROWTH-INDUCING IMPACTS:

The EIR must examine the potential growth-inducing impacts of the proposed General Plan. More specifically, CEQA Guidelines require that the EIR “discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly” (CEQA Guidelines §15126.2(d)). This analysis must also consider the removal of obstacles to population growth, such as improvements in the regional transportation system.

Projected Growth

Lodi currently contains 23,353 housing units. Approximately 3,700 housing units have recently been approved or are under construction. The proposed General Plan accommodates 10,100 new residential units. Together, this results in the potential for 37,200 housing units, an increase of 38% above existing and approved units. Approximately half of the housing units will be low-density housing (i.e. single-family), a quarter medium-density, and the remaining quarter high-density and mixed-use residential (containing a mix of density levels).

Population

Lodi currently contains approximately 63,400 residents. The proposed General Plan could accommodate 26,400 additional residents. Accounting for the current population as well as new residents anticipated from recently approved projects (approximately 9,700 residents); full development of the General Plan could result in a total of 99,500 residents, representing an annual growth rate of 2%, consistent with the Growth Management Ordinance. Total residents under the proposed General Plan would exceed the San Joaquin Council of Governments (SJCOG) population projection of 81,717 in 2030 by 22%. (Notably, these SJCOG estimates are based on historical growth rates in Lodi and do not dictate how much growth could be accommodated.) The proposed General Plan accommodates 20% more residents than the No Project scenario, which allows for a population of 82,600 people. However, the population growth in the proposed General Plan is consistent with an annual growth rate of 2% as allowed in Lodi’s Growth Management Ordinance.

Employment

Lodi currently contains 24,700 jobs. Recently approved or completed development projects are expected to produce an additional 2,900 jobs. Total additional employment accommodated in the proposed General Plan by new commercial, office, industrial, and mixed-use land designations could allow for 23,400 new jobs in Lodi. In sum, Lodi could expect up to 51,000 jobs under the proposed General Plan, an increase of 85%. Total jobs under the proposed General Plan would exceed the SJCOG jobs projection of 33,686 in 2030 by 51%. Similarly, the proposed General Plan accommodates 56% more jobs than the No Project scenario, which includes 32,700 jobs. The increase in jobs under the proposed General Plan serves to improve the balance of jobs and housing.

Jobs/Housing Balance

A city's jobs/employment ratio (jobs to employed residents) would be 1.0 if the number of jobs in the city equaled the number of employed residents. In theory, such a balance would eliminate the need for commuting. More realistically, a balance means that in-commuting and out-commuting are matched, leading to efficient use of the transportation system, particularly during peak hours. The proposed General Plan projects a more balanced jobs/employed residents ratio when compared to existing conditions. In 2008, Lodi had a jobs/employed residents ratio of 0.8, meaning that the city did not have quite enough jobs for all the working people who lived there, even if the match between job skills required and job skills offered had been perfect. As of 2000, 54% of Lodi's employed residents commuted out of Lodi for work. The proposed General Plan designates land area for substantial employment growth, should market opportunities exist, as one attempt to reduce out-commuting and enable existing and future Lodi residents to work in Lodi. While the increase in new jobs exceeds the increase in new employed residents, the combined effect will result in a more balanced ratio of 1.0. This ratio suggests that the city would have about as many jobs as employed residents.

Increase in Regional Housing Demand

As the employment base in Lodi increases, more people may be drawn to Lodi and surrounding areas, thereby increasing housing demand in both Lodi and other adjacent areas that are within commuting distance. Proposed new employment would primarily be located in the southeastern corner of Lodi, easily accessible from major transportation routes. Service to Lodi via Amtrak and regional bus service would also provide access to new jobs from other cities. In addition, the proposed General Plan has the potential to result in development of approximately 10,100 new housing units by the year 2030, which will help meet some of the increased housing need. Lodi's updated Housing Element, which addresses housing programs and how Lodi will accommodate its regional housing needs allocation, is part of the proposed General Plan.

Growth Management

While the proposed General Plan allows growth beyond SJCOG's projections, the proposed General Plan represents an annual growth rate of 2%, which meets the maximum population permissible under the City's Growth Management Ordinance. The proposed General Plan also includes multiple growth management techniques including phasing, a community separator, and continuation of the Growth Management Ordinance. While policies to regulate the location, pace and timing of growth are included, these will not restrict Lodi's ability to meet its housing need obligations or long-range growth projections by regional agencies. Key policies and strategies are described in Chapter 2: Project Description.

Because growth under the proposed General Plan is consistent with allowable growth under the Growth Management Ordinance, is managed through multiple strategies to maintain a compact form, and helps the City achieve a more balanced jobs/housing ratio, the proposed General Plan is not expected to significantly contribute, directly or indirectly, to regional, subregional or citywide growth inducing impacts.

FINDINGS REGARDING SIGNIFICANT IRREVERSIBLE CHANGES:

The EIR must also examine irreversible changes to the environment. More specifically, CEQA Guidelines require the EIR to consider whether “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” (CEQA Guidelines §15126.2(c)). “Nonrenewable resource” refers to the physical features of the natural environment, such as land, waterways, etc.

Air Quality

Increases in vehicle trips and traffic resulting from implementation of the proposed General Plan would potentially contribute to long-term degradation of air quality and atmospheric conditions in the region, other parts of California, and the Western United States. However, technological improvements in automobiles, as well as commercial and industrial machinery, may lower the rate of air quality degradation in the coming decades.

Agricultural Land and Open Space

Development under the proposed General Plan could result in the permanent conversion of just under 2,893 acres of prime farmland to urban uses. This conversion has a wide array of impacts, ranging from habitat modifications to visual disruptions to new noise sources and stormwater drainage constraints. Overall, this represents a significant and irreversible environmental change.

Energy Sources

New development under the proposed General Plan would result in the commitment of existing and planned sources of energy, which would be necessary for the construction and daily use of new buildings and for transportation. Residential and non-residential development use electricity, natural gas, and petroleum products for power, lighting, heating, and other indoor and outdoor services, while cars use both oil and gas. Use of these types of energy for new development would result in the overall increased use of non-renewable energy resources. This represents an irreversible environmental change. However, energy-reduction efforts may lower the rate of increase.

Construction-Related Impacts

Irreversible environmental changes could also occur during the course of constructing development projects made possible by the proposed General Plan. New construction would result in the consumption of building materials, natural gas, electricity, water, and petroleum products. Construction equipment running on fossil fuels would be needed for excavation and the shipping of building materials. Due to the non-renewable or slowly renewable nature of these resources, this represents an irretrievable commitment of resources.

FINDINGS REGARDING CUMULATIVE IMPACTS:

The proposed General Plan’s cumulative impacts are discussed in the DEIR on pages 5-3, 5-4 and 5-5. CEQA requires that the EIR examine cumulative impacts. As discussed in CEQA Guidelines Section 15130(a)(1), a cumulative impact “consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts.” The analysis of cumulative impacts need not provide the level of detail required of the analysis of impacts from the project itself, but shall “reflect the severity of the impacts and their likelihood of occurrence” (CEQA Guidelines §15130(b)).

In order to assess cumulative impacts, the EIR must analyze either a list of past, present, and probable future projects or a summary of projections contained in an adopted general plan or related planning document. It is important to note that the proposed General Plan is essentially a set of projects, representing the cumulative development scenario for the reasonably foreseeable future in the Lodi Planning Area. This future scenario incorporates the likely effects of surrounding regional growth.

By their nature, the air quality, transportation, noise, and greenhouse gas (GHG) emissions analyses presented in Chapter 3: Settings, Impacts, and Mitigation Measures represent a cumulative analysis of the Planning Area as a whole. As a result of adding the proposed General Plan to the regional land use and transportation baseline, the travel demand, level of service operations, and associated air quality and GHG emissions produced by the proposed project is the cumulative condition for CEQA purposes. Some cumulative impacts on transportation, air quality, and noise are found to be significant; in addition, the cumulative effects on GHG emissions are found to be cumulatively significant, and the project's contribution cumulatively considerable.

FINDINGS REGARDING ALTERNATIVES TO THE PROJECT:

CEQA mandates consideration and analysis of a reasonable range of alternatives to the proposed General Plan. According to CEQA Guidelines, the range of alternatives "shall include those that could feasibly accomplish most of the basic purposes of the project and could avoid or substantially lessen one or more of the significant impacts" (CEQA Guidelines §15126.6(c)). The alternatives may result in new impacts that do not result from the proposed General Plan.

Case law suggests that the discussion of alternatives need not be exhaustive and that alternatives be subject to a construction of reasonableness. The impacts of the alternatives may be discussed "in less detail than the significant effects of the project proposed" (CEQA Guidelines §15126.6(d)). Also, the Guidelines permit analysis of alternatives at a less detailed level for general plans and other program EIRs, compared to project EIRs. The Guidelines do not specify what would be an adequate level of detail. Quantified information on the alternatives is presented where available; however, in some cases only partial quantification can be provided because of data or analytical limitations.

No Project Alternative

The No Project Alternative represents the continuation of land use development under the 1991 General Plan. In this scenario, new development results largely from the development of Planned Residential and Planned Residential Reserve areas, in the west and south, respectively. These areas are assumed to develop primarily for residential uses, at seven units per acre, and with a portion of land reserved for public uses, parks, and drainage basins. The No Project Alternative is illustrated in Figure 4.2-1.

The No Project Alternative could result in a total of 82,600 residents and 32,700 jobs, leading to a jobs/employed residents ratio of 0.8. This alternative produces the fewest number of housing units, new residents, and jobs compared with the other alternatives.

Alternative A

Alternative A fills in growth up to the existing Sphere of Influence (SOI) boundary and extends the urban area south to Armstrong Road. The bulk of new growth would be contained in the mile-wide band between Harney Lane and Armstrong Road, including the

Planned Residential Reserve designation between Hogan Lane and Armstrong Road. In the southeast (south of Kettleman Lane and east of SR-99), the alternative includes Business Park/Office uses, with commercial nodes around the Kettleman and Harney Lane interchanges. Limited development is proposed through infill on vacant and underutilized sites in Downtown and along Cherokee Lane.

This alternative includes similar assumptions compared with the proposed General Plan in terms of the density, intensity, and land use categories. As a result, Alternative A could result in a total of 91,000 residents and 41,000 jobs, leading to a jobs/employed residents ratio of 0.9. These numbers represent lower development potential compared with the proposed General Plan and Alternative B, but higher than the No Project Alternative.

Alternative B

In Alternative B, new development is concentrated on the west side of the city, beyond the existing SOI. New neighborhoods on the west side of the city would contain a diverse range of amenities and uses, including neighborhood services, parks and schools. These neighborhoods would be focused around walkable centers containing retail, office, and higher density residential uses. A network of streets connects residential areas to these centers and to the existing street grid where feasible. Commercial and business uses would be located in the southeast, but in a smaller area than in Alternative A. A smaller portion of land is designated for urban and Rural Residential use between Harney and Hogan lanes. Finally, a small commercial node on Highway 12, adjacent to a site for a Lodi campus of San Joaquin Delta College, is also shown.

This alternative includes similar assumptions compared with the proposed General Plan in terms of the density, intensity, and land use categories. As a result, Alternative B could result in 104,400 residents and 47,000 jobs, leading to a jobs/employed residents ratio of 0.9. This alternative produces the largest increase population, but allows fewer jobs compared with the proposed General Plan.

CEQA Guidelines require the identification of an environmentally superior alternative among the alternatives analyzed in an EIR. Alternative A has been selected as the environmentally superior alternative.

Since the No Project Alternative results in the least amount of development, it results in the fewest environmental impacts and therefore would be the environmentally superior alternative. However, CEQA Guidelines stipulate that if the No Project Alternative is identified as the environmentally superior alternative, then another environmentally superior alternative must be identified, among the other alternatives and the project.

After the No Project, Alternative A has the least impact, relative to the proposed General Plan and Alternative B in the six environmental areas that have significant impacts: Traffic and Circulation, Agricultural Resources, Climate Change and Greenhouse Gases, Air Quality, and Noise. Alternative A has relatively more adverse impacts in the areas of Land Use and Housing and Parks and Recreation, when compared to the proposed General Plan and Alternative B. Particularly, in terms of Land Use, Alternative A does not allow sufficient growth to meet the city's future needs or the Growth Management Ordinance's allocation of 2% annual growth. This could also result in a cumulative regional impact as population and employment growth in the region may put additional pressure in the surrounding unincorporated areas or other parts of the region.

Alternative A and Alternative B meet many of plan objectives as described in Chapter 2: Project Description. However, the proposed General Plan achieves all these objectives to the highest extent, specifically exceeding the alternatives in the following three objectives:

- **Objective #1: Compact Urban Form.** The proposed General Plan ensures the most compact urban form, by prioritizing infill development downtown and along the city's major corridors during Phase I.
- **Objective #7: Agricultural Preservation Along Southern Boundary.** The proposed General Plan and Alternative B also preserve an agricultural preservation buffer south of Hogan Lane (Alternative A and the No Project scenario both allow limited development through the Planned Residential Reserve designation).
- **Objective #11: Phasing Future Development.** The proposed General Plan segments development into three phases, providing a framework for how and where urban growth should proceed. Urban reserve areas ensure that the city conforms to its Growth Management Ordinance and grows at a reasonable rate.

Although Alternative A has been chosen as the environmentally superior alternative, it does not in all cases adequately meet the three objectives described above (out of the 11 defined in the Project Description). Most critically, regarding Objective #1, Alternative A puts more growth pressures on other cities in the region and unincorporated portions of San Joaquin County. Reviewing historic trends, between 2000 and 2007, Lodi's population grew at half the rate compared with the County as a whole. Accommodating growth in Lodi through contiguous responsible development relieves some of this pressure elsewhere in the region. Alternative B conforms to the City's Growth Management Ordinance, but does not provide environmental impact reduction benefits and does not achieve all of the plan objectives. The proposed General Plan achieves all plan objectives while establishing policies to reduce environmental impacts to the greatest extent possible.

FINDINGS REGARDING SIGNIFICANT AND UNAVOIDABLE IMPACTS:

Transportation and Circulation

The proposed General Plan would result in a substantial increase in vehicular traffic that would cause certain facilities to exceed LOS standards established by the City (for City facilities) and the County (for regional routes). Proposed General plan policies and improvements have been identified to minimize transportation impacts, but even with these measures, the impact is considered significant and unavoidable. Proposed General Plan policies, intended to improve neighborhood character and the pedestrian environment, could adversely affect access for emergency vehicles in Lodi. Planned improvements that would help mitigate this impact include roadway extensions, roadway widenings, and the construction of a new arterial, all of which would serve to enhance connectivity and local neighborhood circulation. Still, implementation of the proposed General Plan and increases in regional travel passing through Lodi would increase the amount of vehicular traffic in and around Lodi, and would therefore increase the number of potential emergency access conflicts, resulting in a significant and unavoidable impact.

The substantial increases in vehicle trips and vehicle miles of travel resulting from the proposed General Plan could create conflicts with the goals and objectives of established alternative transportation plans. Increased traffic volumes may make it more difficult and time-consuming for pedestrians to cross some streets. Higher traffic volumes on some facilities could discourage bicycle travel, especially among non-expert bicycle users.

Additionally, increased delay on some of Lodi's roadway facilities could increase travel times for the various bus services that serve the city and provide access to regional travel services like Amtrak and ACE.

Agricultural Resources

While one quarter of the gross proposed General Plan potential development area is infill and will not reduce the amount of farmland, some conversion of agricultural land to urban use is inevitable given Lodi's growth needs. If the proposed General Plan were developed to maximum capacity, 2,893 acres of land classified as Prime Farmland would be replaced by urban development (including parks and open spaces). This area represents 69% of the new urban area delineated in the General Plan Land Use Diagram. The most prevalent crop types that would be displaced if the proposed General Plan developed to its fullest potential are vineyards (1,676 acres), deciduous fruits and nuts (516 acres), and field crops (322 acres). Although there are policies in the proposed General Plan to reduce this impact, the potential conversion of agricultural land—which will affect some agricultural activities and prime agricultural soils—is significant and unavoidable.

Climate Change and Greenhouse Gases

Under the proposed General Plan, future emissions are estimated to increase to 419,221 MTCO₂e in 2030 with State mandates, an increase of approximately 32% over the existing condition. This increase in emissions under the proposed General Plan is largely a result of job growth. This estimate, however, does not account for policies in the proposed General Plan that would contribute to lowering emissions, but that are difficult to quantify. Given the current uncertainty in quantifying the impacts of the measures, it is not possible to determine in this analysis if the proposed policies would reduce emissions sufficiently. Therefore, the proposed General Plan would result in a considerable contribution to the significant cumulative impact.

Air Quality

The proposed General Plan would result in an increase in criteria pollutant emissions primarily due to related motor vehicle trips. Stationary sources and area sources would result in lesser quantities of criteria pollutant emissions. Stationary sources and diesel-fueled mobile sources would also generate emissions of TACs including diesel particulate matter that could pose a health risk. Future growth in accordance with the proposed General Plan would exceed the annual San Joaquin Air Pollution Control District (SJVAPCD) thresholds for PM₁₀, as well as the threshold used for this analysis for PM_{2.5}, and would therefore result in a cumulatively considerable net increase of criteria pollutants.

Noise

Implementation of the proposed General Plan will result in higher traffic volumes, more industrial and commercial noise sources, and a larger population, all of which will contribute to the noise environment in Lodi. Future noise impacts related to traffic, railroads, and stationary sources would remain significant and unavoidable, given the uncertainty as to whether future noise impacts could be adequately mitigated for all the individual projects that will be implemented as part of the proposed General Plan.

STATEMENT OF OVERRIDING CONSIDERATIONS:

CEQA requires a public agency to balance the benefits of a proposed project against its unavoidable environmental risks in determining whether to approve the project. CEQA requires the City Council to state in writing specific reasons for approving a project in a “statement of overriding considerations” if the EIR identifies significant impacts of the project that cannot feasibly be mitigated to below a level of significance. Pursuant to California Public Resources Code Section 21081 and CEQA Guidelines Section 15093, the City Council adopts and makes the following Statement of Overriding Considerations regarding the remaining significant and unavoidable impacts of the proposed General Plan, as discussed above, and the anticipated benefits of the proposed General Plan.

The City finds and determines that the majority of the potentially significant impacts of the proposed General Plan will be reduced to less-than-significant levels by the mitigation measures recommended in the document. However, as set forth above, the City’s approval of the proposed General Plan will result in project and cumulative significant adverse environmental impacts related to Transportation, Agricultural Resources, Climate Change and Greenhouse Gases, Air Quality and Noise that cannot be avoided even with the incorporation of all feasible mitigation measures into the proposed General Plan, and there are no feasible Project alternatives which would mitigate or avoid the significant environmental impacts.

The proposed General Plan has unavoidable and significant adverse impacts as referenced previously; however, the benefits of the project outweigh the significant adverse impacts. The implementation of the proposed General Plan will mitigate to the greatest extent feasible impacts created. Every viable General Plan alternative, as well as the “no project” alternative, would have a significant and unavoidable environmental impact. There are no feasible mitigation measures have been identified that would reduce the impacts to a level that is less than significant. Mitigations, changes or alterations have been required in, or incorporated into, the proposed General Plan which avoids or substantially lessens the significant environmental effects identified in the FEIR.

In light of the environmental, social, economic, and other considerations set forth below related to this proposed General Plan, the City chooses to approve the proposed General Plan, because in its view, the economic, social, and other benefits resulting from the proposed General Plan will render the significant effects acceptable.

The following statement identifies the reasons why, in the City’s judgment, the benefits of the proposed General Plan outweigh the significant and unavoidable effects. The substantial evidence supporting the enumerated benefits of the proposed General Plan can be found in the Findings, which are herein incorporated by reference, in the proposed General Plan itself, and in the record of proceedings. Each of the overriding considerations set forth below constitutes a separate and independent ground for finding that the benefits of the proposed General Plan outweigh its significant adverse environmental effects and is an overriding consideration warranting approval.

1. The proposed General Plan allows the City to plan for growth in an orderly manner to meet future land needs based on projected population and job growth.
2. The proposed General Plan allows the City to meet the City’s job/housing balance objective, the need for additional housing in the community, and State Law requirements.

3. The proposed General Plan promotes economic development of the community, maintains and improves the quality of life in the community, preserves and enhances environmental resources, and conserves the natural and built environment.
4. The proposed General Plant integrates economic development into the General Plan and underscores the City's goals for fiscal health, a strong regional center, a vibrant Downtown, and retail strength.
5. The proposed General Plan protects and enhances community assets, including quiet communities with distinctive character, a strong sense of community, a diverse population, high quality building design, convenient shopping, post-secondary educational opportunities, broad choice in employment and entertainment, a family atmosphere with excellent recreational activities, and job opportunities close to where people live.
6. The proposed General Plan provides for the positive direction for the future physical development of the City, such as supporting mixed use development, transit supportive land uses and economic revitalization of underutilized sites to create more economic vitality in these commercial corridors.
7. The proposed General Plan enhances an efficient multi-modal transportation system and promotes a well-integrated and coordinated transit network and safe and convenient pedestrian and bicycle circulation.
8. The proposed General Plan serves a critical need to allow the City to plan for the equitable distribution of community facilities and services to meet the needs of all segments of the population and provide services for special needs that increase and enhance the community's quality of life while avoiding over-concentration in any one area.

NOW, THEREFORE, BE IT DETERMINED AND RESOLVED that the City Council hereby adopts the findings, statements of overriding considerations, and other determinations set forth in this resolution and based thereon certifies the Final Environmental Impact Report for the Lodi General Plan (State Clearinghouse No. 2009022075).

Dated: February 17, 2010

=====

I hereby certify that Resolution No. 2010-21 was passed and adopted by the City Council of the City of Lodi in a regular meeting held February 17, 2010, by the following vote:

AYES: COUNCIL MEMBERS – Hitchcock, Johnson, Mounce, and Mayor Katzakian

NOES: COUNCIL MEMBERS – Hansen

ABSENT: COUNCIL MEMBERS – None

ABSTAIN: COUNCIL MEMBERS – None



RANDI JOHL
City Clerk

Lodi Environmental Impact Report & General Plan



City Council

February 17, 2010

Agenda

1. California Environmental Quality Act (CEQA)
 - *Requirements*
 - *Purpose*
 - *Topics*
2. General Plan *Draft* EIR
 - *Project Description*
 - *Impacts*
 - *Alternatives*
 - *Cumulative and Growth-Inducing Impacts*
3. General Plan *Final* EIR
4. Next Steps

CEQA Requirements

- CEQA is a statute that requires state and local agencies to identify the significant environmental impacts of their actions and to avoid or mitigate those impacts, if feasible.
- A public agency must comply with CEQA when it undertakes an activity defined as a “project.”
- “Program” vs. “Project” EIR

Purpose

1. Meet CEQA requirements by evaluating physical impacts of the Plan and its alternatives.
2. Inform the public and decision-makers of these potential impacts to assist in the review and adoption the Plan.
3. Assist decision-makers in determining appropriate amendments to land use regulations or other standards.

Draft Environmental Impact Report

Topics Evaluated

1. Land Use and Housing
2. Traffic and Circulation
3. Agricultural Resources
4. Biological Resources
5. Cultural Resources
6. Climate Change and Greenhouse Gases
7. Hydrology and Water Quality
8. Air Quality
9. Flood Hazards
10. Seismic and Geologic Hazards
11. Noise
12. Hazardous Materials and Toxics
13. Infrastructure
14. Public Facilities
15. Parks and Recreation
16. Visual Resources

Project Description

- Basis for impact analysis
- Description of Plan characteristics
- Development potential
- Precise location and boundaries
- Objectives (11 Planning Themes)

Executive Summary

Table ES-3: Summary of Impacts and Proposed General Policies that Reduce the Impact

#	Impact	Proposed General Policies that Reduce the Impact	Significance	Mitigation
3.1 Land Use and Housing				
3.1-1	The proposed General Plan would not physically divide any established communities and would increase connectivity locally and regionally.	N/A	Beneficial	N/A
3.1-2	The proposed General Plan would conflict with an applicable land use plan, policy, or regulation.	LU-P1, LU-P17, CD-P2, CD-P3, CD-P4, CD-P6, CD-P9, CD-P11, CD-P31, GM-P10	Less than Significant	None required
3.2 Traffic and Circulation				
3.2-1	The proposed General Plan would result in a substantial increase in vehicular traffic that would cause certain facilities to exceed level of service standards established by the governing agency.	T-G1, T-P1, T-P2, T-P3, T-P4, T-PNEW, T-NEW, T-P8, T-NEW, T-P9, T-P10, T-P13, T-P14, T-P15, T-P16, T-P17, T-P18, T-P19, T-P20, T-P22, T-P24, T-P25, T-P27, T-P-28, T-P29, T-P43, T-P44, T-P45	Significant and Unavoidable	No feasible mitigation is currently available.
3.2-2	The proposed General Plan may adversely affect emergency access.	T-P1, T-P2, T-P8, T-P9, T-P10	Significant and Unavoidable	No mitigation measures are feasible.
3.2-3	The proposed General Plan may conflict with adopted policies, plans, or programs supporting alternative transportation modes.	T-G1, T-P8, T-P9, T-P10, T-P13, T-P14, T-P15, T-P16, T-P17, T-P18, T-P19, T-P20, T-P22, T-P24, T-P25, T-P27, T-P28, T-P29, T-P43, T-P44, T-P45, T-G2, T-G3, T-G4, T-G5, T-P11, T-P12, T-P21, T-P23, T-P26, T-P30, T-P38, T-P39	Significant and Unavoidable	No feasible mitigation is currently available.
3.3 Agriculture and Soil Resources				
3.3-1	Buildout of the proposed General Plan would convert substantial amounts of Important Farmland to non-agricultural use.	C-G1, C-G2, C-P1, C-P2, C-P3, C-P4, C-P5, C-P6, C-P7, C-P8, GM-G1, GM-P2	Significant and Unavoidable	Not directly mitigable aside from preventing development altogether
3.3-2	Buildout of the proposed General Plan would result in potential land use incompatibilities with sites designated for continued agriculture use.	C-P1, C-P2, C-P3, C-P4, C-P5, C-P6, C-P7, C-P8, GM-G1, GM-P2, CD-G1	Less than Significant	None required

Impacts

- Beneficial
 - *Land Use and Housing*
 - *Parks and Recreation*
- Less than Significant
 - *(Most impacts were mitigated through General Plan policies)*

Impacts

- Significant and Unavoidable Impacts
 - *Traffic and Circulation*
 - *Agricultural Resources*
 - *Climate Change and Greenhouse Gases*
 - *Air Quality*
 - *Noise*
- Require Statement of Overriding Considerations

Impacts

- Significant and Irreversible Environmental Changes
 - *Air Quality*
 - *Agricultural Land and Open Space*
 - *Energy Sources*
 - *Construction-Related*

Alternatives

- No Project Alternative results in the fewest impacts
- Alternative A is the “environmentally superior alternative”
- The proposed General Plan best meets Plan objectives (11 planning themes)

Growth-Inducing Impacts

- The General Plan allows approximately:
 - *23,400 new jobs*
 - *26,400 new residents*
 - *10,100 new housing units*
 - *jobs/employed residents ratio of 1:1*
- No significant growth-inducing impacts

Cumulative Impacts

- Many impacts are “cumulative” by nature
 - *Traffic*
 - *Greenhouse Gas Emissions*
 - *Air Quality*
 - *Noise*
- Other cumulative impacts:
 - *Agricultural Resources*
 - *Cultural Resources*
 - *Biological Resources*
 - *Land Use*

Final Environmental Impact Report

Contents

1. Introduction
2. Comments on the DEIR
3. Response to Comments
4. Revisions to the Draft EIR

Comments Received

- Planning Commission Hearing: December 6, 2009
- Written Comments:
 - *Six public agencies*
 - *37 individuals*
 - *Topics addressed, include:*
 - *Transportation and Traffic*
 - *Water Demand and Supply*
 - *Armstrong Road/Agricultural Cluster Study Area*
 - *Environmentally Superior Alternative*

New and Edited Policies

- Coordinate with Lodi Unified School District on school planning
- Revise Level of Service Standards
- Implement conservation and efficiency measures into municipal operations
- Improve storm drain and flood prevention facilities as needed
- Implement measures to reduce noise impacts on sensitive receptors
- Coordinate with Caltrans and neighboring jurisdictions to develop a fair-share fee program.

Next Steps

- Certification of the Final EIR
- Revision of the General Plan
 - *Will include policy revisions/additions per EIR findings and responses*
- Adoption of the General Plan

Lodi Environmental Impact Report & General Plan



City Council
February 17, 2010

CAPITOL AVENUE
DEVELOPMENT & INVESTMENTS

528 Third Street
West Sacramento, CA 95605

Phone: (916) 374-1662
Fax: (916) 374-8447

February 9, 2010

Mayor Phil Katzakian and I-Inorable Members of the Lodi City Council
Lodi City Hall
221 W. Pine Street
Lodi, CA 95240

RE: City of Lodi General Plan and Environmental Impact Report

Dear Mayor Katzakian and Honorable Members of the Lodi City Council:

On behalf of Lodi Victor Ventures, the private development partnership involving development of the San Joaquin Delta College (SJDC) project on Highway 12, we respectfully request to be included in the City of Lodi General Plan Update as part of the Lodi General Plan. The project area we wish to be included in the General Plan is depicted on the attached EIR exhibit of Alternative B.

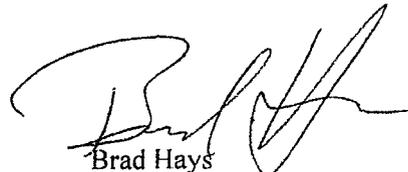
Although SJDC abandoned participating in developing the Highway 12 site in 2009, we have retained enforceable contracts with the land sellers in the belief that SJDC will revive its efforts to develop a Lodi satellite campus. We do not have formal communications that SJDC will locate at the Hwy 12 site; however, we believe that this location still provides the best opportunity to develop a long term campus in the City of Lodi, and this location is consistent with the substantial planning and design work that has been undertaken to date. Should you elect to include this project area in the General Plan, it sends a clear message of welcome to SJDC while advancing the ability of SJDC and the City of Lodi to complete the satellite campus. As you are no doubt aware, the City would retain control over the timing and type of development in this area as the General Plan land use designation is merely a preliminary step toward entitling this property.

We understand that this SJDC project has faced many challenges. But it is important to note that the City of Lodi, SJDC, and our partnership have expended substantial time and money evaluating, planning, and designing this project and quantifying the substantial benefits it brings to the community. Approving this request provides flexibility to the City, SJDC and us to advance important benefits to the citizens of Lodi.

Once again, thank you for your consideration and we would appreciate your support.

Sincerely,


Patrick McCuen


Brad Hays



*Please immediately confirm receipt
of this fax by calling 333-6702*

CITY OF LODI
P. O. BOX 3006
LODI, CALIFORNIA 95241-1910

ADVERTISING INSTRUCTIONS

SUBJECT: PUBLIC HEARING TO CONSIDER CERTIFICATION OF FINAL ENVIRONMENTAL IMPACT REPORT AND ADOPTION OF THE GENERAL PLAN

PUBLISH DATE: SATURDAY, FEBRUARY 6, 2010

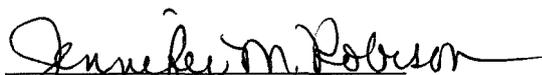
LEGAL AD

TEAR SHEETS WANTED: One (1) please

SEND AFFIDAVIT AND BILL TO: RANDI JOHL, CITY CLERK
City of Lodi
P.O. Box 3006
Lodi, CA 95241-1910

DATED: THURSDAY, FEBRUARY 4, 2010

ORDERED BY: RANDI JOHL
CITY CLERK


JENNIFER M. ROBISON, CMC
ASSISTANT CITY CLERK

MARIA BECERRA
ADMINISTRATIVE CLERK

Verify Appearance of this Legal in the Newspaper – Copy to File

Faxed to the Sentinel at 369-1084 at _____ (time) on _____ (date) _____ (pages)
LNS _____ Phoned to confirm receipt of all pages at _____ (time) _____ MB _____ JMR (initials)



DECLARATION OF POSTING

PUBLIC HEARING TO CONSIDER CERTIFICATION OF FINAL ENVIRONMENTAL IMPACT REPORT AND ADOPTION OF THE GENERAL PLAN

On Friday, February 5, 2010, in the City of Lodi, San Joaquin County, California, a Notice of Public Hearing to consider certification of Final Environmental Impact Report and adoption of the General Plan (attached and marked as Exhibit A) was posted at the following locations:

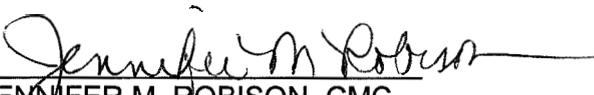
Lodi Public Library
Lodi City Clerk's Office
Lodi City Hall Lobby
Lodi Carnegie Forum

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 5, 2010, at Lodi, California.

ORDERED BY:

RANDI JOHL
CITY CLERK



JENNIFER M. ROBISON, CMC
ASSISTANT CITY CLERK

MARIA BECERRA
ADMINISTRATIVE CLERK



DECLARATION OF MAILING

PUBLIC HEARING TO CONSIDER CERTIFICATION OF FINAL ENVIRONMENTAL IMPACT REPORT AND ADOPTION OF THE GENERAL PLAN

On Friday, February 5, 2010, in the City of Lodi, San Joaquin County, California, I deposited in the United States mail, envelopes with first-class postage prepaid thereon, containing a Notice of Public Hearing to consider certification of Final Environmental Impact Report and adoption of the General Plan, attached hereto marked Exhibit A. The mailing list for said matter is attached hereto marked Exhibit B.

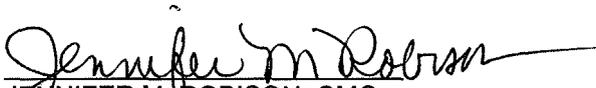
There is a regular daily communication by mail between the City of Lodi, California, and the places to which said envelopes were addressed.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 5, 2010, at Lodi, California.

ORDERED BY:

**RANDI JOHL
CITY CLERK, CITY OF LODI**


JENNIFER M. ROBISON, CMC
ASSISTANT CITY CLERK

MARIA BECERRA
ADMINISTRATIVE CLERK



CITY OF LODI

Carnegie Forum
305 West Pine Street, Lodi

NOTICE OF PUBLIC HEARING

Date: February 17, 2010

Time: 7:00 p.m.

For information regarding this notice please contact:

Randi Johl

City Clerk

Telephone: (209) 333-6702

EXHIBIT A

NOTICE OF PUBLIC HEARING

NOTICE IS HEREBY GIVEN that on **Wednesday, February 17, 2010**, at the hour of 7:00 p.m., or as soon thereafter as the matter may be heard, the City Council will conduct a public hearing at the Carnegie Forum, 305 West Pine Street, Lodi, to consider the following item:

- a) **Certification of Final Environmental Impact Report and adoption of the General Plan.**

Information regarding this item may be obtained in the Community Development Department, 221 West Pine Street, Lodi, (209) 333-6711. All interested persons are invited to present their views and comments on this matter. Written statements may be filed with the City Clerk, City Hall, 221 West Pine Street, 2nd Floor, Lodi, 95240, at any time prior to the hearing scheduled herein, and oral statements may be made at said hearing.

If you challenge the subject matter in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice or in written correspondence delivered to the City Clerk, 221 West Pine Street, at or prior to the close of the public hearing.

By Order of the Lodi City Council:

Randi Johl
City Clerk

Dated: February 3, 2010

Approved as to form:

D. Stephen Schwabauer
City Attorney

General Plan Update – mailing list

EXHIBIT B

<i>Company</i>	FirstName	LastName	Address1	City	State	Postal Code
1. J. Manassero			2171 E. Armstrong Rd.	Lodi	CA	95242
2.	Denis	Silber	1050Port Chelsea Cr.	Lodi	CA	95240
3. Calif. Valley Miwok Tribe	Silvia	Burley, Chairperson	10601 Escondido Place	Stockton	CA	95212
4. Ione Band of Miwok Indians	Matthew	Franklin, Chairperson	P.O. Box 1190	Ione	CA	95640
5. North Valley Yokuts Tribe	Katherine Erolinda	Perez	P.O. Box 717	Linden	CA	95236
6. Southern Sierra Miwuk Nation	Anthony	Brochini, Chairperson	P.O. Box 1200	Mariposa	CA	95338
7. Wilton Rancheria	Mary	Daniels-Tarango, Chairperson	7916Farnell Way	Sacramento	CA	95823
8. Brookfield Homes	Douglas	Brewer	500 La Gonda Way, Suite 100	Danville	CA	94526

Kari Chadwick - sent via e-Notification

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