Archer Daniels Midland
Sweetener Distribution Center
Initial Study/
Mitigated Negative Declaration

February 2007

Prepared by:
RBF Consulting
500 Ygnacio Valley Road, Suite 270
Walnut Creek, CA 94596

Lead Agency:
City of Lodi
Community Development Department
221 West Pine Street
Lodi, CA 95240

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APPENDICES (PLEASE REFER TO THE ENCLOSED DISK)

LSA Associates, *Biological Resources Evaluation*, November 2006.

LSA Associates, *A Cultural and Paleontological Resources Study for the Archer Daniels Midland Sweetener Distribution Center Project*, August 2006.

KD Anderson and Associates, Inc., *Traffic Information for ADM Distribution Center, Lodi*, October 26, 2006.

Kleinfelder, Inc., *Geotechnical Services Report Distribution Terminal Guild Avenue and Victor Road*, January 17, 2005.

SECTION 1
INTRODUCTION

This Initial Study addresses the potential environmental effects of the proposed Archer Daniels Midland (ADM) Sweetener Distribution Center. The project site is composed of one parcel totaling approximately 14.94 acres at the northeast corner of Victor Road (State Route 12) and North Guild Avenue in the City of Lodi. The parcel is mostly undeveloped, except for an existing vacant single-family residence and associated carport and parking lot. The proposed Sweetener Distribution Center would be implemented in three construction phases. Phase I would consist of an operations/distribution building, storage tank farm, boiler room, cooling towers and a rail spur extension from the existing Central California Traction Company (CCTA) mainline to the project site. Phase II would consist of a 95,000-square-foot dry goods warehouse/distribution building. Phase III would consist of a 20,000-square-foot liquid sweetener packaging/warehouse facility. Phase I of the project would be constructed immediately after City approval. Phases II and III would be market driven expansions, with an implementation timeframe of up to ten years from the construction of Phase I. The proposed project would provide two driveways for the facility, one off of North Guild Avenue and the other off of Victor Road (for emergency vehicle access only). Additional project related infrastructure improvements include the widening of Victor Road, as well as the relocation of Pacific Gas and Electric 60 kilovolt Lockeford-Lodi #2 power lines.

1.1 LEGAL AUTHORITY AND FINDINGS

This Initial Study has been prepared in compliance with the California Environmental Quality Act (CEQA) (Public Resources Code 21000 et seq.) and the *CEQA Guidelines* (California Administrative Code 15000 et seq.), as amended.

An Initial Study is a preliminary analysis prepared by the lead agency to determine whether an EIR or Negative Declaration must be prepared for a project and to identify the significant effects to be analyzed in an EIR. Section 15382 of the *CEQA Guidelines* defines "significant effect on the environment" as a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, mineral, flora, fauna, ambient noise, and objects of historic or aesthetic significance.

The Initial Study for the proposed project will serve to focus on effects determined to be potentially significant. This document has been prepared as an objective, full-disclosure document to inform agency decision-makers and the general public of the direct and indirect physical environmental effects of the proposed action and any measures to reduce or eliminate potential adverse impacts.

1.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Geology and Soils
☐ Hazards and Hazardous Materials	☐ Hydrology and Water Quality	☐ Land Use and Planning
☐ Mineral Resources	☐ Noise	☐ Population and Housing
☐ Public Services	☐ Recreation	☐ Transportation/Traffic
☐ Utilities and Service Systems	☐ Mandatory Finding of Significance	

1.3 DETERMINATION

On the basis of this initial evaluation:

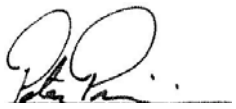
☐ I find that the proposed project COULD NOT have a significant effect on the environment and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect: 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards; and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects: 1) have been analyzed adequately in an EARLIER EIR or NEGATIVE DECLARATION pursuant to applicable legal standards; and 2) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures imposed upon the proposed project, nothing further is required.



2/07/07

Peter Pirnejad, Planning Manager — Date
City of Lodi

1.4 EVALUATION OF ENVIRONMENTAL IMPACTS

(a) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

(b) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

(c) Once the lead agency has determined that a particular physical impact may occur, then that checklist answers must indicate whether the impact is potentially significant, less than significant with the mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there

(d) "Negative Declaration: Less Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).

(e) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063 (c) (3) (D). In this case, a brief discussion should identify the following:

(1) Earlier Analysis Used. Identify and state where they are available for review.
(2) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
(3) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures, which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

(f) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

(g) Supported Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

(h) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

(i) The explanation of each issue should identify:

(1) The significance criteria or threshold, if any, used to evaluate each question; and
(2) The mitigation measure identified, if any, to reduce the impact less than significance

SECTION 2
PROJECT DESCRIPTION

2.1 Project Title:

Archer Daniels Midland (ADM) Sweetener Distribution Center

2.2 Lead Agency Name and Address:

City of Lodi
Department of Community Development
221 West Pine Street
Lodi, CA 95240

2.3 Contact Person and Telephone Number:

Mr. Peter Pirnejad, Planning Manager
209-333-6711

2.4 Project Location:

The project site is located in the County of San Joaquin within the City of Lodi, at the northeast corner of Victor Road (State Route 12) and North Guild Avenue (APN 049-040-91). Figure 1 (Regional Map) shows the project site's regional location in San Joaquin County. Figure 2 (Vicinity Map) shows the immediate site location.

2.5 Project Sponsor's Name and Address:

Mr. Ian Poulin
Archer Daniels Midland
350 North Guild Avenue
Lodi, CA 95240

2.6 General Plan Designation and Zoning:

The City of Lodi *General Plan* land use designation and zoning of project site is Light Industrial (M-1).

2.7 Description of Project:

The project site is composed of one parcel totaling approximately 14.94 acres at the northeast corner of Victor Road (State Route 12) and North Guild Avenue. The subject property is mostly undeveloped, except for an existing vacant single-family residence, carport and parking lot on the western most part of the site. Historically, the site has been used for agricultural purposes but has been recently fallow. The project sponsor, ADM, proposes the development of a Sweetener Distribution Center and accessory components. All existing structures would be removed from the site.

The proposed project would be implemented in three phases. Phase I would be constructed on the westerly portion of the site and would include a 10,500-square-foot operations building containing a two-bay truck wash, equipment room, scale and load-out area, as well as office space. The operations building would be approximately 30 feet in height. Accessory components would include a storage tank farm with ten tanks each approximately 40 feet in height, a dry storage silo approximately 55 feet in height, a boiler room approximately 30 feet in height, cooling towers each approximately 20 feet in height, and a rail spur extension from the existing Central California Traction Company (CCTA) mainline,

which runs along the eastern property boundary. The proposed rail extension would split into five separate spurs that would run parallel to Victor Road. The CCTA rail spur would require easements from adjacent property owners (refer to Figure 3, Site Plan). Phase I of the Sweetener Distribution Center would result in the creation of ten new jobs.

Phase II of the proposed project would be constructed on the eastern portion of the site and consist of a 95,000-square-foot dry goods warehouse/distribution. Phase II would include six semi-truck docking stalls, an extension of a fire access road and an additional rail spur serving this phase of the proposed project exclusively. Phase III would consist of the construction of a 20,000-square-foot liquid sweetener packaging/warehouse facility located on the far west portion of the project site immediately adjacent to North Guild Avenue south of the proposed access road. Phases II and III would be market driven expansions, with an implementation timeframe of up to ten years from the construction of Phase I. Phases II and III would result in the creation of approximately 30 new jobs, with a maximum of ten employees per shift per phase.

Operation of the Sweetener Distribution Center would involve the delivery of corn syrup by rail car, which would be pumped into the storage tank farm. The corn syrup would be distributed individually or in a sweetener blend. Cyrstalline beet sugar would be pneumatically offloaded by trucks into the dry storage silo. The beet sugar would be conveyed into a melting/blending tank where hot, potable water would be added to create liquid sugar. The liquid sugar would be distributed from the site as sucrose, invert products[1] and/or blends by truck. Phases II and III of the proposed project would enhance the storage and distribution capabilities of Phase I with the addition of the larger warehouse/distribution building and the liquid sweetener packaging/warehouse facility.

The proposed project would construct a driveway off of North Guild Avenue. This driveway would be the only ingress/egress point for cars and trucks utilizing the project site. An additional driveway would be provided off Victor Road, but would be for emergency access only. Pursuant to California Department of Transportation (Caltrans) requirements, the proposed project would construct infrastructure improvements along Victor Road. Improvements would include paving a new roadway segment and constructing new curb and gutter for the eventual widening of Victor Road. Caltrans would transfer ownership of an 18.5-foot wide parcel along Victor Road to the City for the construction a "rails to trails" bike path. In addition, a ten-foot wide easement would be granted to the City by ADM for the extension of the City's storm drain and sanitary sewer system. North Guild Avenue

[1] Invert sugar is composed of equal parts of glucose and fructose.

FIGURE 1: REGIONAL MAP

FIGURE 2: VICINITY MAP

FIGURE 3: SITE PLAN

improvements would include the construction of curb, gutter and sidewalk, to match the existing curb, gutter and sidewalk north of the project site.

In addition, telephone and Pacific Gas and Electric (PG&E) 60 kilovolt Lockeford-Lodi #2 power lines would be relocated on the project site. PG&E would relocate a portion of the Lockeford-Lodi 60 KV transmission pole line approximately twenty to thirty feet to the north of existing alignment to accommodate roadway improvements associated with the proposed development.

Landscaping for the proposed project (along Victor Road) would consist of a mixture of redwood, Italian cypress and strawberry trees with a variety of large shrubs for screening. Additional screening would be provided by a three-foot tall landscape berm. Planting along North Guild Avenue would consist of American sweet gum trees and a variety of shrubs that would match the landscaping of the adjacent property to the north. Interior planting would consist of a variety of trees, spreading shrubs and groundcover. For security purposes, a six-foot fence would enclose the entire project site. Said landscape plans will be subject to review and approval by the Planning Commission and the City.

2.8 Surrounding Land Uses and Existing Setting:

The project site is bounded by Victor Road and North Guild Avenue to the west and south, as well as a CCTA mainline that runs parallel to the eastern property line. Surrounding land uses include a warehouse distribution center to the north, a corporation yard and light industrial uses to the east and south and vacant land/scattered single-family residences to the west.

Topography on the project site is mostly flat, sloping slightly from east to west and north. The elevation of the project site ranges from approximately 57 to 61 feet above mean sea level. The subject property is located within a highly altered environment and natural communities have been largely displaced. The property itself has been used historically for agricultural purposes, but is currently fallow. Plant communities on the project site are limited to row and field crops, ruderial, scraped/paved and urban/built area. There is a large sycamore tree located in the southeast area of the site. The western portion of the site contains an existing vacant single-family residence, carport and parking lot. The eastern portion is completely undeveloped.

2.9 Other Public Agencies Whose Approval is Required (e.g., permits, financing approvals, or participation agreement).

The proposed project would require an encroachment permit from Caltrans.

SECTION 3
EVALUATION OF ENVIRONMENTAL IMPACTS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
I AESTHETICS				
Would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒

Discussion:
The proposed project would not result in a substantial effect on a scenic vista because there are no established scenic vistas within the vicinity of the project site, and the project site is surrounded by similar existing light industrial uses. Therefore, no impacts would occur as a result of the proposed project.

(Source: 1)

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒

Discussion:
The project would not damage any scenic resources and is not located within the vicinity of a state scenic highway. There would be no impact.

(Source: 1)

c. Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐

Discussion:
The project site is located in an urbanized area and would be developed in a manner consistent with the City's *General Plan* land use designation for the site (Light Industrial) and with the existing surrounding land uses. Pursuant to the *General Plan's* Urban Design and Cultural Resources Element Goal I, Policy 2, the proposed project would be subject to Site Plan and Architectural Review Committee approval. Landscape plans prepared for the project would adequately screen proposed structures on the site from Victor Road and North Guild Avenue. As a result, the proposed project would have a less than significant impact on the existing visual character or quality of the site and its surroundings.

(Source: 1)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
d. Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Discussion:
Lighting for the proposed Sweetener Distribution Center (Phases I, II and III) would consist of wall and pole mounted lighting fixtures, which would create new sources of light and glare. However, light fixtures would be directed downward to reduce the amount of light or glare spillover onto adjacent properties. In addition, the project's creation of new sources of light or glare would be incremental given the project's location in proximity to similar industrial land uses that have the same type of light fixtures. Therefore, impacts would be less than significant.

(Source: 1)

II AGRICULTURAL RESOURCES

Would the project: {In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland.}				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒

Discussion:
Although the project site was historically used for agriculture purposes, it is currently fallow, and is not zoned for agricultural use. In addition, the project site is not identified and/or mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide importance. Therefore, implementation of the proposed project would not result in the conversion of farmland, as described above, to non-agricultural use. No impact would result.

(Sources: 1, 2)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒

Discussion:
The subject property is not zoned for agricultural use, nor is it under a Williamson Act contract. Therefore, no impact would occur as a result of the proposed project.

(Sources: 1, 2)

c. Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	☐	☐	☐	☒

Discussion:
See Checklist Items II.a. and II.b., above. The project site is designated by the City's *General Plan* and *Zoning Ordinance* as Light Industrial and is not considered agricultural land, nor is it located immediately adjacent to active agricultural land. Furthermore, the project site is surrounded predominately by existing urban development. Therefore, the proposed project would not involve changes that could result in the conversion of farmland to a non-agricultural use and no impact would result.

(Sources: 1, 2)

III AIR QUALITY

Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒

Discussion:
The San Joaquin Valley Air Pollution Control District (SJVAPCD) is the regional agency responsible for overseeing compliance with state and federal laws, regulations and programs regarding air quality. The SJVAPCD has prepared and implements specific plans to meet the applicable laws, regulations and programs, including the 1991 *Air Quality Attainment Plan* (AQAP). In addition, the SJVAPCD has developed the *Guide for Assessing and Mitigating Air Quality Impacts* (*Guide*) to help lead agencies in evaluating the significance of air quality impacts.

In formulating its compliance strategies, the SJVAPCD relies on planned land uses established by local general plans. When a project proposes to change planned uses assumed in an adopted plan by requesting a general plan amendment, the project may depart from the assumptions used to formulate the plans of the SJVAPCD in such a way that cumulative results of incremental change may hamper or prevent the SJVAPCD from achieving its goals. Land use patterns influence transportation needs, and motor vehicles are the primary source of air pollution. As stated in the *Guide*, projects proposed in jurisdictions with

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact

general plans that are consistent with the SJVAPCD's AQAP and projects that conform to those general plans would not create significant cumulative air quality impacts.

The proposed Sweetener Distribution Center would be consistent with the City of Lodi *General Plan* and, as such, traffic volumes representing build-out of the project were used to develop projections in the AQAP. Therefore, the proposed project would not conflict with the applicable clean air plan. No impacts would result.

(Sources: 1, 4)

b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☒	☐	☐

Discussion:
The San Joaquin Valley is considered a nonattaintment area for ozone and PM_{10} (fine particulate matter less than 10 microns in diameter). The Federal Clean Air Act (CCA) and the California Clean Air Act (CCA) require areas that are designated nonattaintment to reduce emissions until air quality standards are met.

The project does not propose operational features that would emit substances that would violate local or regional air quality standards. The project would create air emissions during construction and from vehicle traffic to and from the project site. The SJVAPCD has established thresholds for construction (short-term) and operational (long-term) emissions for air pollutants including reactive organic gases (ROG) and nitrogen oxide compounds (NO_x), which are known as ozone precursors, and PM_{10}.

Construction activities, including the operation of construction vehicles and worker vehicle trips, produce emissions of ROG and NO_X. SJVAPCD does not require quantification of the construction emissions of these compounds, although it is recommended for very large or long-lasting projects. The proposed project would not be considered very large or long-lasting under the *Guide*. Based on the number of construction vehicles and worker vehicle trips that would be created by the project, the project would emit quantities of ROG and NO_X below SJVAPCD thresholds and, therefore, these emissions would be less than significant.

PM_{10} is the pollutant of greatest concern with respect to construction activities. As a result, the proposed project would be subject to District Regulation VIII (Fugitive Dust Prohibitions). Compliance with Regulation VIII would reduce PM_{10} impacts to a less than significant level. Implementation of Mitigation Measure III.b, drawn directly from Regulation VIII, would ensure that the project's construction-related air quality impacts would be less than significant.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact

Implementation of the following mitigation measure would reduce potential construction-related air quality impacts to less than significant:

RECOMMENDED MITIGATION MEASURE

Mitigation Measure III.a. The following control measures shall be included in construction contracts for Phases I, II and III of the proposed project, and shall be shown on plans submitted for a grading or building permit for all Phases:

- All disturbed areas, including storage piles, which are not being actively utilized for construction purposes, shall be effectively stabilized of dust emissions using water, chemical stabilizer/suppressant, covered with a tarp or other suitable cover or vegetative ground cover.
- All on-site unpaved roads and off-site unpaved access roads shall be effectively stabilized of dust emissions using water or chemical stabilizer/suppressant.
- All land clearing, grubbing, scraping, excavation, land leveling, grading, cut and fill, and demolition activities shall be effectively controlled of fugitive dust emissions utilizing application of water or by presoaking.
- When materials are transported off-site, all material shall be covered, or effectively wetted to limit visible dust emissions, and at least six inches of freeboard space from the top of the container shall be maintained.
- All operations shall limit or expeditiously remove the accumulation of mud or dirt from adjacent public streets at the end of each workday. The use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions.
- Following the addition of materials to, or the removal of materials from, the surface of outdoor storage piles, said piles shall be effectively stabilized of fugitive dust emissions utilizing sufficient water or chemical stabilizer/suppressant.
- Within urban areas, trackout shall be immediately removed when it exceeds 50 or more feet from the site and at the end of each workday. Cleanup of carryout or trackout shall be accomplished by:
    - Manually sweeping and picking up;
    - Operating a rotary brush or broom accompanied or preceded by sufficient wetting to limit Visual Dust Emission (VDE) to 20% opacity;
    - Operating a PM_{10}-efficient street sweeper; and
    - Flushing with water, if curbs and gutters are not present and where the use of water will not result as a source of trackout material or result in adverse impacts on storm drain systems or violate National Pollutant Discharge Elimination System permit program.
- Any site with 150 or more vehicle trips per day shall prevent carryout and trackout.

(Sources: 1, 4)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
c. *Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non – attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?*	☐	☐	☐	☒

Discussion:
See discussion under Check List Items III.a. and III.b., above. For any project that does not individually have operational air quality impacts, the determination of a significant cumulative impact should be based on the evaluation of the project's consistency with the general plan and the general plan with regional air quality plan. As previously noted under Check List Item III.a., the proposed project would be consistent with the City of Lodi *General Plan* land use designation for the project site. No impact would result.

(Sources: 1, 4)

d. *Expose sensitive receptors to substantial pollutant concentrations?*	☐	☐	☒	☐

Discussion:
The SJVAPCD *Guide* defines sensitive receptors as facilities that house or attract children, the elderly, people with illnesses, or others who are especially sensitive to the effects of air pollutants. Hospitals, schools, convalescent facilities, and residential areas are examples of sensitive receptors. According to the SJVAPCD criteria, due to the small size of the proposed project and the estimated amount of daily vehicle trips, it qualifies for what is referred to as a Small Project Analysis Level. No quantification of ozone precursor emissions is needed for such projects. With regard to dust during grading and construction, the proposed project may expose sensitive receptors to pollutant concentrations; however, there are no sensitive receptors located near the project site. In addition, Mitigation Measure III.a. would reduce construction-related air quality impacts. Impacts would be less than significant.

(Sources: 1, 4)

e. *Create objectionable odors affecting a substantial number of people?*	☐	☐	☒	☐

Discussion:
The SJVAPCD has determined some types of facilities that have been known to produce odors in San Joaquin County. Examples include wastewater treatment facilities, asphalt batch plants, chemical manufacturing facilities and feed lots/dairies. Sweetener distribution centers are not identified by the SJVAPCD as a use that produces objectionable odors. In addition, corn syrup and crystalline beet sugar are odorless/colorless substances. As such, the proposed project would not produce objectionable odors. Impacts would be less than significant.

(Source: 4)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
IV BIOLOGICAL RESOURCES				
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐

Discussion:
LSA Associates (LSA) prepared a *Biological Resources Evaluation*, dated November 2006, for the proposed project. Based on a comprehensive literature review and field surveys, LSA biologists characterized and mapped the project site's vegetation and habitats, and identified special status species that have the potential to occur on-site and within the immediate vicinity.

The predominate natural habitats in the region consist of grasslands and riparian corridors associated with larger river systems. The Mokelumne River is located approximately 0.75 mile north of the site. Topography on the project site is mostly flat, sloping slightly from east to west and north. The elevation of the project site ranges from approximately 57 to 61 feet above mean sea level. The subject property is located within a highly altered environment and natural communities have been largely displaced. The site itself has been used historically for agricultural purposes, but is currently fallow. Habitat on the project site is limited to row and field crops (12.15 acres), ruderial (1.13 acre), scraped/paved (0.41 acre) and urban/built area (1.26 acres). Additionally, there is a large sycamore tree located in the southeast area of the site.

Generally, agricultural lands, including row and field crops, do not provide high quality habitat for resident wildlife and/or plant species, including special status species. Nevertheless, some species inhabit these communities, which may provide limited cover and foraging habitat. The loss of row and field crops would contribute to the regional cumulative loss of wildlife; therefore, it is considered a potentially significant impact. However, this impact would be reduced to less than significant through the implementation of Mitigation Measure IV.a.

According to the *Biological Resources Evaluation*, no suitable habitat for special status plant species is present on-site. As a result, special status plant species are considered absent from the project site. However, several special status wildlife species have potential to occur on-site since suitable foraging habitat is present.

The following special status wildlife species have potential to occur on the project site:

Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact

Bat Species

Special-status bat species (state/federal species of special concern and San Joaquin County Multi-Species Habitat Conservation Plan (SJCMSHCP) covered species), such as the pale western big-eared bat, Pacific western big-eared bat, greater western mastiff bat, western red bat, small-footed mytotis, long eared mytois, fringed myotis, long-legged myotis, and Yumma mytois may occur on the project site. Although no bats were observed on-site by LSA, the property does provide at least marginal foraging habitat. However, given the abundance of row and field crops in the region and the small amount that would be removed by the proposed project, impacts to bat species are considered less than significant. In addition, implementation of Mitigation Measure IV.a. would ensure impacts to bat species are less than significant.

Tricolored Blackbird

The tricolored blackbird is a state/federal species of special concern, is listed by the United States Fish and Wildlife Service (USFWS) as a Migratory Non-game Bird of Management Concern (MNBMC), and is a SJCMSHCP-covered species. The *Biological Resources Evaluation* prepared for the proposed project indicates that there is no suitable nesting habitat present on-site but the row and field crops could provide suitable foraging habitat for the tricolored blackbird. Given the abundance of row and field crops in the region and the small amount that would be removed by the proposed project, impacts to tricolored blackbirds are considered less than significant. In addition, implementation of Mitigation Measure IV.a. would ensure impacts to tricolored blackbirds are less than significant.

Western Burrowing Owl

The western burrowing owl is a state/federal species of concern and a SJCMSHCP-covered species. Suitable nesting (i.e., habitat suitable for burrows) and foraging habitat for burrowing owl occur on the project site, and the California Natural Diversity Database (CNDDB) contains two records of burrowing owls within ten miles of the project site. In addition, field surveys of the project site identified several suitable burrows in the small berm along the northern property boundary, as well as a casting that appeared to be from a burrowing owl. Due to the presence of suitable burrowing owl habitat and an apparent casting, it is expected that burrowing owls are potentially foraging and nesting on-site. Implementation of Mitigation Measures IV.a. and IV.b. would reduce potential impacts to western burrowing owl to less than significant.

Aleutian Canada Goose

The Aleutian Canada goose is a federal delisted and a SJCMSHCP-covered species. Aleutian Canada geese do not nest in California, but could forage in the row and field crops on the project site in the winter. The CNDDB does not contain any records for this species within ten miles of the project site, and no geese were observed during on-site field investigations. Nonetheless, suitable foraging habitat is present; therefore, this species could occur on the project site during the winter. However, given the abundance of row and field crops in the region and implementation of Mitigation Measure IV.a. impacts to Aleutian Canada geese are considered less than significant.

Ferruginous Hawk

The ferruginous hawk is a state/federal species of concern and a SJCMSHCP-covered species. Ferruginous hawks do not nest in California but could forage in the row and field crops on the project site during the winter. The CNDDB does not contain any records for this species within ten miles of the project site, and no ferruginous hawks were observed during on-site field investigations. Nonetheless, suitable foraging habitat is present and, therefore, this species could occur on the project site during the

Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact

winter. Implementation of Mitigation Measure IV.a., would ensure that impacts to ferruginous hawk would be less than significant.

Swainson's Hawk

Swainson's hawk is a state threatened, a MNBMC and a SJCMSHCP-covered species. It has no federal status. California Swainson's hawks occur in the northeastern portion of the state, in the Great Basin Province, and in the Central Valley. Nests are built in the tops of large trees, primarily associated with riparian habitats. The CNDDB contains many records for Swainson's hawks within ten miles of the project site. Although no riparian habitat is present at the project site, the large sycamore tree in the southeast corner could provide suitable nesting habitat, and the row and field crops on the project site could provide suitable foraging habitat. Although no nests were observed on-site, the presence of suitable nesting and foraging habitat indicates that the species could potentially occur on-site. Implementation of Mitigation Measures IV.a. and IV.c. would reduce potential impacts to Swainson's hawk to less than significant.

Mountain Plover

The mountain plover is a state species of concern, is proposed for listing as federally threatened, and a SJCMSHCP-covered species. This species winters in short grasslands, freshly plowed fields, newly sprouting grain fields, and sometimes sod farms. The CNDDB does not contain any records of mountain plover within ten miles of the project site. However, since suitable foraging habitat is present, this species could occur on the project site during the winter. Implementation of Mitigation Measure IV.a. would reduce potential impacts to mountain plover to less than significant.

Northern Harrier

The northern harrier is a state species of special concern and a SJCMSHCP-covered species. It has no federal status. The CNDDB does not contain any records for the northern harrier within ten miles of the site, and no northern harriers were observed during site surveys. However, row and field crops provide suitable nesting and foraging habitat for northern harrier and, therefore, this species could occur on the project site. Implementation of Mitigation Measure IV.a. would reduce potential impacts to northern harrier to less than significant.

White-Tailed Kite

The white-tailed kite is fully protected under California Department of Fish and Game Code, the federal Migratory Bird Treaty Act (MBTA), and is a SJCMSHCP-covered species. This raptor species uses scattered trees for breeding and uses grasslands and marshes for foraging. The CNDDB does not contain any records for the white-tailed kite within ten miles of the project site, and no white-tailed kites or nests were observed on-site. However, the sycamore tree in the southeast corner of the site could provide suitable nesting habitat, and the row and field crops could provide suitable foraging habitat. Therefore, this species could occur on the project site. Implementation of Mitigation Measures IV.a. and IV.d. would reduce potential impacts to white-tailed kites to less than significant.

Prairie Falcon

The prairie falcon is a state species of concern and a SJCMSHCP-covered species. It has no federal status. This species nests on cliffs in dry, open terrain, and forages in open areas (e.g., grasslands and agricultural fields). The CNDDB does not contain any records for the prairie falcon, and no prairie falcons were observed on-site. However, given the presence of suitable foraging habitat, this species could occur on the

Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact

project site. Implementation of Mitigation Measure IV.a. would reduce potential impacts to prairie falcons to less than significant.

RECOMMENDED MITIGATION MEASURES

Implementation of the following mitigation measures would reduce potential impacts to special status wildlife and plant species to a less than significant level:

Mitigation Measure IV.a. To compensate for the loss of habitat, the project sponsor shall implement the SJCMSHCP conservation strategy, which includes one (or a combination of two or more) of the following options to provide compensation pursuant to the SJCMSHCP, and Incidental Take Avoidance Mitigation Measures (ITMM), if necessary.

1) Pay the appropriate fee as indicated in the SJCMSHCP; or
2) Dedicate, as conservation easements of fee or title, or in-lieu dedications; or
3) Purchase approved mitigation bank credits; or
4) Propose an alternative mitigation plan, consistent with the goals of the SJCMSHCP and equivalent in biological value to options 1, 2, and 3 above, subject to approval by the Joint Powers Authority (JPA) with concurrence of the Permitting Agencies' representatives on the Technical Advisory Committee (TAC).

Implementation of the SJCMSHCP conservation strategy, as specified above, would reduce impacts to plant communities and associated wildlife (bat species, tri-colored blackbird, Aleution Canada geese, ferruginous hawk, mountain plover, northern harrier, and prairie falcon) to a less than significant level.

Mitigation Measure IV.b. To mitigate impacts to the western burrowing owl, the project sponsor shall implement the SJCMSHCP conservation strategy described in Mitigation Measure IV.a., as well as the following ITMMs that shall be implemented prior to the construction of Phase I, II and III:

1) During the non-breeding season (September 1 through January 31) any burrowing owls occupying the project site shall be evicted via passive relocation as described in the California Department of Fish and Game's Staff Report on Borrowing Owls (October 1995).
2) During the breeding season (February 1 through August 31) occupied burrows shall not be disturbed and shall be provided with a 245-foot protective buffer until and unless the SJCMSHCP TAC, with the concurrence of the Permitting Agencies' representatives on the TAC; or unless a qualified biologist approved by the Permitting Agencies verifies through non-invasive means that either: 1) the birds have not begun egg laying; or 2) juveniles from occupied burrows are foraging independently and are capable of independent survival. When the fledglings are capable of independent survival, the burrow can be destroyed.

Implementation of Mitigation Measures IV.a. and IV.b. would reduce impacts to western burrowing owl to a less than significant level.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact

Mitigation Measure IV.c. To mitigate impacts to the Swainson's hawk, the project sponsor shall implement the SJCMSHCP conservation strategy described in Mitigation Measure IV.a., as well as the following ITMMs that shall be implemented prior to the construction of Phase I, II and III:

1) If the project sponsor elects to retain a nest tree, the following ITMM shall be implemented during construction activities:

   If a nest tree in the vicinity of the project site becomes occupied during construction activities, then all construction activities shall remain a distance of two times the dripline diameter of the tree, measured from the nest.

2) If the project sponsor elects to remove a nest tree, then trees shall be removed between September 1 and February 15, when nests are unoccupied.

Implementation of Mitigation Measures IV.a. and IV.c. would reduce impacts to Swainson's hawk to a less than significant level.

Mitigation Measure IV.d. To mitigate impacts to white-tailed kite, the project sponsor shall implement the SJCMSHCP conservation strategy described in Mitigation Measure IV.a., as well as the following ITMMs that shall be implemented prior to the construction of Phase I, II and III:

1) Preconstruction surveys shall investigate all potential nesting trees on the project site during the nesting season (February 15 to September 15) whenever white-tailed kites are noted on-site or within the vicinity of the project site during the nesting season.

2) A setback of 100 feet from nesting areas shall be established and maintained during the nesting season for the period encompassing nest building, and continuing until fledglings leave nests. This setback applies whenever construction or other ground-disturbing activities must begin during the nesting season in the presence of nests which are known to be occupied. Setbacks shall be marked by brightly colored temporary fencing.

Implementation of the Mitigation Measures IV.a. and IV.d. would reduce impacts to white-tailed kite to a less than significant level.

(Source: 5)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☐	☒

Discussion:
According to the *Biological Resources Evaluation* prepared for the proposed project, the subject property does not contain any riparian habitat or other sensitive natural communities. No impact would result.

(Source: 5)

c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒

Discussion:
According to the *Biological Resources Evaluation* prepared for the proposed project, the subject property does not contain any protected wetlands, vernal pools or waters regulated by Section 404 of the Clean Water Act. No impact would result.

(Source: 5)

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒

Discussion:
The project site is located in a mostly urbanized area and is surrounded by industrial uses. The subject property does not link two or more large regional open space areas, is not part of a regional wildlife movement corridor, and is not located near a river, stream or lake. Therefore, the proposed project would not 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. No impact would result.

(Source: 5)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒

Discussion:
The City of Lodi *General Plan* (Conservation Element) includes goals and policies intended to protect sensitive native vegetation and wildlife habitats. Goal E, Policy 2 in the *General Plan* Conservation Element refers to the City's regulation of "heritage tree" removal. The proposed project would result in the removal of a large sycamore tree. However, heritage trees are not defined in the *General Plan,* and the City has not adopted a tree protection ordinance. Therefore, the proposed project would not conflict with any of the goals or policies outlined in the *General Plan* (including Conservation Element Goal E, Policy 2), or with any adopted ordinances protecting biological resources. There would be no impact.

(Source: 1, 5)

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Discussion:
The SJCMSHCP was developed to minimize and mitigate impacts to plant and wildlife resulting from the loss of open space projected to occur in San Joaquin County between 2001 and 2051. The City of Lodi adopted the SJMSHCP in 2001, and projects under the jurisdiction of the City can seek coverage under the plan. The proposed project would result in the conversion of 12.15 acres of row and field crops to an industrial use. As a result, the project sponsor would be required to pay the appropriate fee as indicated in the SJCMSHCP to mitigate the loss of open space. Payment of the appropriate fee would ensure the project's consistency with the SJCMSHCP goals and practices. No impact would result.

(Source: 1, 5)

V CULTURAL RESOURCES

Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	☒	☐

Discussion:
LSA Associates prepared the *Cultural and Paleontological Resources Study*, dated August 2006, for the project site and investigated three potential historical resources on-site (ADM-1, ADM-2 and ADM-3). ADM-1 consists of a Tudor-Revival single-family residence, garage, carport, and bird coop, built around 1950. ADM-2 consists of a razed single-family residence, barn, and garage; the basement of the residence remains. The ADM-2 residence was built in 1935. ADM-3 is a dismantled segment of the Southern

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact

Pacific Railroad tracks that were originally built by the San Joaquin and Sierra Nevada Railroad in 1882.

The LSA Study reached the following conclusions: ADM-1 does not possess the significance necessary to be eligible for the California Register of Historical Resources (CRHR) given that the residence represents a common architectural style in the Lodi area. Due to a lack of significance, ADM-1 does not constitute a cultural resource for the purposes of CEQA. ADM-2 also does not appear to be eligible for the CRHR. Although ADM-2 meets the CEQA minimum age requirement (50 years), it does not possess the significance necessary to be eligible for the CRHR and, therefore, does not constitute a cultural resource for the purposes of CEQA. ADM-3 meets the CEQA minimum age requirement and is important for its association with development of the region's early transportation network and economy, but it lacks the integrity necessary to convey its significance. ADM-3 does not constitute a cultural resource for the purposes of CEQA. Therefore, the proposed project's impacts to known historical resources located on-site would be less than significant.

(Source: 6)

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐

Discussion:
According to the *Cultural and Paleontological Resources Study* prepared for the project site, no archaeological resources were previously recorded or observed on the subject property. However, the proposed project's construction activities could impact previously undiscovered archaeological resources and, therefore, would require mitigation to reduce potential impacts to a less than significant level.

RECOMMENDED MITIGATION MEASURE

Implementation of the following mitigation measure would reduce potential impacts to previously undiscovered archaeological resources to a less than significant level:

Mitigation Measure V.a. If deposits of prehistoric or historical archaeological materials[1] not identified by the *Cultural and Paleontological Resources Study* prepared for the project site are encountered during Phase I, II or III activities, all work within 25 feet of the discovery shall be redirected and a qualified archaeologist contacted to access the finds, evaluate them for their CRHR eligibility, and make recommendations. It is recommended that adverse effects to such deposits be avoided by project activities. If such deposits cannot be avoided, they shall be evaluated for their CRHR eligibility. If the deposits are not significant, avoidance is not necessary. If the deposits are eligible, they shall be avoided or adverse effects mitigated. Upon completion of the assessment, the archaeologist shall prepare a report documenting the methods and results, and provide recommendations for mitigating adverse effects and

[1] Prehistoric materials can include flacked-stone (e.g., projectile points, knives, choppers) or obsidian, chert, basalt, or quartzite toolmaking debris; bone tools; culturally darkened soil (i.e., midden soil often containing heat-affected rock, ash and charcoal, shellfish remains, faunal bones, and cultural materials); and stone milling equipment (e.g., mortars, pestles, handstones). Prehistoric archaeological sites often contain human remains. Historical materials can include wood, stone, concrete, or adobe footings, walls and other structural remains; debris-filled wells or privies; and deposits of wood, glass, ceramics, metal, and other refuse.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact

for the treatment of the archaeological materials discovered. The report shall be submitted to the project sponsor, the City of Lodi, Community Development Department, and the Central California Information Center.

(Source: 6)

c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Discussion:
According to the *Cultural and Paleontological Resources Study* prepared for the project site, no paleontological resources were previously recorded or observed on the subject property. However, the Late Pleistocene Modesto Formation sediments that underlie the project's vicinity are sensitive for paleontological resources. Therefore, construction activities could impact previously undiscovered paleontological resources. Mitigation Measure V.b. would reduce potential impacts to a less than significant level.

RECOMMENDED MITIGATION MEASURE

Implementation of the following mitigation measure would reduce potential impacts to previously undiscovered paleontological resources to a less than significant level:

Mitigation Measure V.b. Though unlikely, if paleontological resources are discovered during Phase I, II or III project activities within five feet of the ground surface while no paleontological monitor is present, all work within 25 feet of the discovery shall be redirected until a qualified paleontologist has assessed the situation and made recommendations regarding their treatment. Project personnel shall not move or collect any paleontological resources. It is recommended that adverse effects to paleontological resources be avoided by project activities. If avoidance is not feasible, the paleontological resources shall be evaluated for their significance. If the resources are not significant, avoidance is not necessary. If the resources are significant, they shall be avoided by adverse effects, or such effects mitigated.

If a paleontological assessment is required because of material found on site, a report shall be prepared documenting the methods, results, and recommendations of the assessment. The report shall be submitted to the project sponsor and the City of Lodi, Community Development Department.

(Source: 6)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
d. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

Discussion:
No human remains, including those interred outside of formal cemeteries, were previously recorded or observed on the project site during LSA's cultural resources record search and field investigation. However, the proposed project's construction activities could impact previously undiscovered human remains. Mitigation Measure V.c. would reduce potential impacts to a less than significant level.

RECOMMENDED MITIGATION MEASURE

Implementation of the following mitigation measure would reduce potential impacts to previously undiscovered human remains to a less than significant level:

Mitigation Measure V.c. If human remains are encountered during Phase I, II or III activities, work within 25 feet of the discovery shall be redirected and the County Coroner notified immediately. At the same time, an archaeologist shall be contacted to assess the situation. Project personnel shall not collect or move any human remains or associated materials. If the human remains are of Native American origin, the Coroner shall notify the Native American Heritage Commission within 24 hours of this identification. The Native American Heritage Commission will identify a Native American Most Likely Descendant (MLD) to inspect the site and provide recommendations for the proper treatment of the remains. Upon completion of the assessment, the archeologist shall prepare a report documenting the methods and results, and provide recommendations regarding the treatment of the human remains and any associated cultural materials, as appropriate and in coordination with the recommendations of the MLD. The report shall be submitted to the project sponsor, the City of Lodi, Community Development Department, and the Central California Information Center.

(Source: 6)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
VI GEOLOGY AND SOILS				
Would the project:				
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
➢ *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*	☐	☐	☐	☒

Discussion:
According to the City's *General Plan*, no earthquake faults underlie the City of Lodi. Kleinfelder prepared a *Geotechnical Services Report*, dated January 2006, for the proposed project, which indicates that the project site lies within Seismic Zone 3 and has a one in ten chance of an earthquake with an active peak acceleration level of 0.03g (3/10 the acceleration of gravity) occurring within the next fifty years. Additionally, the nearest Seismic Source Type A fault is mapped greater than 9.32 miles from the project site and the nearest Seismic Source Type B fault is mapped greater than 6.21 miles from the project site. Given that recognized faults neither cross the site nor are adjacent to it, the potential for fault rupture is considered remote and a less than significant impact would result from the project.

(Sources: 1, 7)

➢ *Strong seismic ground shaking?*	☐	☐	☒	☐

Discussion:
If a significant earthquake were to occur on one of the faults described in Checklist Item VI.a.i., the project site would experience moderate shaking and possibly some structural damage. However, the project's adherence to the California Building Code (CBC) minimum standards for good engineering and construction practices would reduce potential seismic impacts. In addition, the project would incorporate all design and construction related recommendations provided in Kleinfelder's *Geotechnical Services Report.* As a result, impacts would be less than significant.

(Sources: 1, 7)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
➢ *Seismic related ground failure, including liquefaction?*	☐	☐	☒	☐

Discussion:
Liquefaction is a phenomenon in which loose, saturated granular materials experience a sudden loss of shear strength during seismic shaking. Effects of soil liquefaction include sand boils, differential settlement, lateral spread and slope failure. Liquidfaction would be anticipated to occur on sites with high levels of ground water, saturated soils or sandy soil layers.

According to the project's *Geotechnical Services Report* and associated soil borings, the project site contains soils that are predominately silty sand to the maximum depths explored with interbedded layers of sandy silt, clayey sand, relatively "clean" sand, and silty clay with sand. The soils were generally loose to depths of about five feet below the existing grade and medium-dense to very-dense to the maximum depths explored. Soil types of this nature do not present a significant risk of ground failure or liquidfaction. The test borings also checked for the presence of groundwater during and immediately following drilling operations. Groundwater seepage was not encountered. However, groundwater elevations and soil moisture conditions within the project site vary depending on seasonal rainfall, irrigation practices, land use and/or runoff conditions.

Based on the soil boring results, the project site would be suitable for implementation of the proposed project given its incorporation of specific project design and construction recommendations provided in the *Geotechnical Services Report*, as well as its adherence to the CBC. These requirements would ensure that impacts would be less than significant.

(Source: 8)

➢ *Landslides?*	☐	☐	☐	☒

Discussion:
The subject property, as well as the area surrounding the project site, is relatively flat. Furthermore, the project site is surrounded predominately by existing urban development. Due to the developed nature and topographic features of the site and surrounding area, the potential for landslides is considered remote. No impact would result from the implementation of the proposed project.

(Source: 7)

b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐

Discussion:
The proposed project would involve construction activities that would include grading, excavation and trenching for the implementation of the proposed Sweetener Distribution Center, accessory components and pavement surfaces.

Given the relatively small size of the project and the minimal amount grading that would be required, the proposed project would not result in substantial soil erosion, loss of topsoil or a significant change in the site's existing topography. In addition, pursuant to the City's *General Plan* Conservation Element Goal

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact

D, Policy 1, the project sponsor would be required to prepare an erosion control and sediment plan prior to project approval. The plan would include features such as Best Management Practices (BMPs), mitigation for sediment runoff beyond the boundaries of the project site, and a plan for the revegetation and stabilization of all disturbed soils for all Phases of the project. A less than significant impact would result.

(Sources: 1, 7)

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on, or off, site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐

Discussion:
See discussion above under Checklist Items VI.a.iii. and VI.a.iv. Based on the conclusions made in the project's *Geotechnical Services Report,* the project site is stable and suitable for the proposed project. Impacts would be less than significant.

(Source: 7)

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☐	☒

Discussion:
Expansive clay-rich soils swell when wet and shrink when dry, which can cause substantial damage to foundations, concrete slabs and pavement sections. The project's *Geotechnical Services Report* determined that the project site does not contain expansive soils. There would be no impact.

(Source: 7)

e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

Discussion:
The proposed project would be served by the City of Lodi wastewater system. Therefore, there would be no related impacts associated with septic tanks or alternative wastewater disposal systems.

(Source: 1, 7)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
VII HAZARDS AND HAZARDOUS MATERIALS				
Would the project:				
a. *Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*	☐	☐	☐	☒

Discussion:
The proposed Sweetener Distribution Center would not necessitate the routine use, transport or disposal of hazardous materials. Raw materials transported to the project site would be agricultural products that would be blended and/or mixed with each other, or with potable water. Wastewater produced by the proposed truck wash would be directed into the City of Lodi wastewater system for treatment. Therefore, implementation of the proposed project would not create a significant hazard to the public or the environment. No impact would result.

(Source: 1, 2)

b. *Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*	☐	☐	☒	☐

Discussion:
See discussion under Checklist Item VII.a., above. The proposed project would not use and/or contain hazardous materials and would not create a significant hazard to the public or the environment through the release of hazardous materials. There would be no impact.

(Source: 1, 2)

c. *Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*	☐	☐	☐	☒

Discussion:
The proposed project would not be located within one-quarter mile of an existing or proposed school. No impact would result.

(Sources: 1, 3)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒

Discussion:
According to the State Department of Toxic Substances Control's *EnviroStor* database and the State Water Resources Control Board *GeoTracker* database, the project site is not included on a list of hazardous materials sites. As a result, the proposed project would not create a significant hazard to the public or the environment. There would be no impact associated with the project.

(Sources: 1, 11, 12)

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒

Discussion:
The project site is not located within an airport land use plan, nor within two miles of a public airport. Therefore, the project would not result in a safety hazard for people residing or working in the project area. There would be no impact.

(Sources: 1, 3)

f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒

Discussion:
The project site is not located within the vicinity of a private airstrip. Therefore, the project would not result in a safety hazard for people residing or working in the project area. There would be no impact.

(Sources: 1, 3)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒

Discussion:
The City of Lodi's Emergency Plan is based on San Joaquin County's Emergency Plan. The City and County Plans represent a comprehensive disaster preparedness program for the area. The proposed project would not impair implementation of, nor physically interfere with the City or County's adopted emergency response plan or emergency evacuation plan. No impact would result.

(Source: 1)

h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒

Discussion:
The project site is located in a developed urban area and is not located adjacent to natural areas that would be subject to wildland fires. Therefore, no impacts would occur as a result of the proposed project.

(Sources: 1, 3)

VIII HYDROLOGY AND WATER QUALITY

Would the project:				
a. Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐

Discussion:
Implementation of the proposed project would result in an increase of impervious surface. The project would create new sources of operational (long-term) and construction related (short-term) storm water runoff that could potentially result in minor amounts of pollutants entering the City storm drain system. However, given that the project would result in the disturbance of over one acre of land, the project sponsor would be required to obtain a National Pollutant Discharge Elimination System (NPDES) permit. NPDES coverage would be obtained under the General Permit by filing a Notice of Intent (NOI) with the Central Valley Regional Water Quality Control Board. The preparation of a Storm Water Pollution Prevention Plan (SWPPP) would also be require pursuant to the NPDES General Permit conditions. Compliance with the NPDES permit conditions and the implementation of the SWPPP would reduce operational and construction related water quality impacts to a less than significant level.

(Sources: 1, 3)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☒	☐

Discussion:
The proposed project would not include a well for groundwater extraction, but as noted above, the project would result in the increase of impervious surface. Given the relatively small size of the proposed project, the loss of permeable area (approximately nine acres) would not substantially deplete groundwater recharge since there is little dependence on groundwater recharge in the area. Therefore, the proposed project would not substantially deplete groundwater supplies, nor would it interfere with groundwater extraction. Impacts would be less than significant.

(Sources: 1, 3)

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off- site?	☐	☐	☐	☒

Discussion:
The project site does not contain a stream or river, nor is it located in proximity to a stream or river. Implementation of proposed project would not alter the existing drainage pattern of the area, nor would not alter the course of a stream or river resulting in substantial erosion or siltation. There would be no impact.

(Sources: 1, 3)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off- site?	☐	☐	☐	☒

Discussion:
The project site does not contain a stream or river, nor is it located in proximity to a stream or river. Therefore, the proposed project would not alter the existing drainage pattern of the area, nor would it alter the course of a stream or river resulting in substantial increase in the rate or amount of surface runoff in a manner that would result in flooding. There would be no impact.

(Sources: 1, 3)

e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐

Discussion:
The proposed project would result in an increase in impervious surface. Therefore, the project would create additional storm water runoff. The proposed project would connect to the existing storm water drainage system located within North Guild Avenue. North Guild Avenue contains a 42-inch storm drain main line that connects to a 60-inch storm drain line within Turner Road. The storm drain line within Turner Road discharges directly into the Mokelumne River. Although the proposed project would increase storm water runoff, the existing drainage system was designed to handle future development consistent with build-out of the City's *General Plan*; therefore, the existing storm drain system would have the capacity to accommodate the proposed project. Thus, a less than significant impact would result.

(Sources: 1, 3)

f. Otherwise substantially degrade water quality?	☐	☐	☐	☒

Discussion:
See discussion under Checklist Item VIII.a. No impact would result.

(Sources: 1)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒

Discussion:
The project site is not located within an area mapped by the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRM) as a 100-year flood hazard area, nor does the project propose the construction of housing. Therefore, no impacts would occur as a result of the proposed project.

(Source: 3)

h. Place within a 100-year flood hazard area structures, which would impede or redirect flood flows?	☐	☐	☐	☒

Discussion:
See Checklist Item VIII.g., above. No impact would result.

(Sources: 1, 3)

i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☒	☐

Discussion:
The entire City of Lodi is located within a dam inundation area for the Pardee and Camanche Dam and dike system. Floodwater from the Pardee Dam would take four hours and 20 minutes to reach west Lodi, and floodwater from the Camanche Dam and dike system would take four to six hours to reach Lodi[2]. Given the low probability of a dam and/or dike failure and the presence of sufficient warning time, impacts would be less than significant. Additionally, the project site is located near the Moklelumne River levee system, which could flood during extreme conditions. However, FEMA has evaluated the risks associated with the levee system and determined that flood hazards would only constrain development in the area immediately adjacent to the levees. Given the project site's distance (approximately three-quarters of a mile from the levee system) potential impacts would be less than significant. No mitigation is required.

(Sources: 1, 3)

[2] San Joaquin County, Office of Emergency Services, Dam Failure Plan, December 19, 2003.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
j. Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

Discussion:
A seiche is the tide-like rise and drop of water in a closed body of water caused by earthquake-induced seismic shaking or strong winds. A tsunami is a series of large waves generated by a strong offshore earthquake or volcanic eruption. Given the substantial distance of the site from San Francisco Bay or the Pacific Ocean, seiche and tsunami waves would not be a threat to the site. The proposed project site is flat and does not have any steep slopes or hillsides that would be susceptible to mudflows or landslides. Therefore, no impact would occur.

(Sources: 1, 3)

IX LAND USE AND PLANNING

Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒

Discussion:
The proposed project would not physically divide an established community. The project site is surrounded by existing light industrial uses, and the proposed Sweetener Distribution Center would not impede circulation by pedestrians or vehicles on public access routes in the vicinity of the site. There would be no impact associated with the project.

(Source: 1)

b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

Discussion:
The proposed project would be consistent with the City's *General Plan* policies and *Zoning Ordinance* regulations, and would not conflict with any other land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect. No impact would result.

(Sources: 1, 2)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

Discussion:
The City of Lodi adopted the SJCMSHCP in 2001. The conservation plan was developed to minimize and mitigate impacts to plant and wildlife habitat resulting from the loss of open space. Pursuant to the SJCMSHCP, the proposed project would be subject to a Development Fee, which would pay for the preservation of lands used to mitigate the cumulative impacts related to new development, including but not limited to acquisition, enhancement, restoration, maintenance and/or operation of habitat/open space conservation lands. The payment of this fee would ensure the proposed project's compliance with the SJCMSHCP. No impact would result.

(Source: 1)

X MINERAL RESOURCES

Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒

Discussion:
According to the City's *General Plan*, the subject property and surrounding area are not known to contain regionally and/or state valued mineral resources. Therefore, implementation of the proposed project would not result in an impact to mineral resources.

(Source: 1)

b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Discussion:
The subject property has not been historically used for mineral extraction. In addition, the City's *General Plan* does not identify the project site as a locally important mineral resource recovery site. There would be no impact.

(Source: 1)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
XI NOISE				
Would the project result in:				
a. *Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*	☐	☐	☒	☐

Discussion:
The proposed project would not include operational features that would result in a significant increase in noise levels. The City's *General Plan* Noise Element outlines many goals and policies regarding land use and associated noise standards. According to Figure 6-4 in the *General Plan*, the presumed acceptable noise level for manufacturing and other industrial facilities is 70 dB. Although the proposed project would result in an incremental increase in noise, it would not exceed the 70 dB standard, nor would it be located near an identified sensitive receptor outlined in *General Plan*. In addition, the project site is located in an urbanized area, and is bounded by North Guild Avenue, Victor Road (State Route 12) and a CCTA rail line. The proposed project's anticipated noise levels would be imperceptible compared to the existing ambient noise levels currently generated by the surrounding industrial area, highway and rail line. Impacts would be less than significant. Construction noise is addressed in Checklist Item XI.d., below.

(Source: 1)

b. *Exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?*	☐	☐	☐	☒

Discussion:
Ground borne vibrations occur when a vibration source causes soil particles to move or vibrate. Sources of ground borne vibrations include natural events (earthquakes, volcanic eruptions, sea waves, landslides, etc.) and human created events (explosions, operation of heavy machinery and heavy trucks, etc.). The proposed project would not involve any operations that would generate excessive ground borne vibrations or ground borne noise levels. There would no impact.

(Sources: 1, 2)

c. *A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?*	☐	☐	☒	☐

Discussion:
Refer to Checklist Item, XI.a., above. The project would not result in a significant increase in noise levels and, therefore, would not create a permanent increase in ambient noise levels in the vicinity of the project site. Impacts would be less than significant.

(Sources: 1, 2)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☒	☐	☐

Discussion:
As stated in Checklist Items XI.a. and XI.b., the proposed project's operational features would not generate or expose people to excessive amounts of noise or ground borne noise levels. However, short-term noise levels and ground borne vibrations created during the project's construction may create a temporary disturbance to the neighboring properties. Construction related noise impacts may be significant without the implementation of mitigation measures. The proposed project's compliance with these mitigation measures would reduce potentially significant short-term noise impacts to a less than significant level.

RECOMMENDED MITIGATION MEASURE

Implementation of the following mitigation measure would reduce construction related noise to a less than significant level:

Mitigation Measure XI.a. Prior to the issuance of building and/or grading permits for Phase I, II and III of the proposed project, the project sponsor shall demonstrate, to the satisfaction of the City of Lodi, that the project would comply with the following measures:

- The project's construction activities including grading, excavation and trenching shall be limited to between the hours of 7:00 a.m. and 7:00 p.m. weekdays and Saturdays. No construction activities shall be permitted on Sundays or holidays. In addition, construction hours, allowable workdays, and the telephone number of the job superintendent shall be clearly posted at all construction entrances.
- All construction equipment, fixed or mobile, shall be in good working order and equipped with properly operating and maintained mufflers.

(Sources: 1, 2)

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Discussion:
The project site is not located within an airport land use plan, nor within two miles of a public airport or public use airport. No impact would result.

(Source: 1)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Discussion:
There are no private airstrips within the vicinity of the proposed project site. Therefore, no impacts would occur as a result of the proposed project.

(Source: 1)

XII POPULATION AND HOUSING

Would the project:				
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒

Discussion:
The proposed project would not include the construction of residential units, nor require the extension of roads or other infrastructure that would directly or indirectly induce substantial population growth. Phase I of the proposed project would create approximately ten new jobs and an additional 30 jobs would be created by Phases II and III. However, the creation of new jobs initially in Phase I and the incremental increase of jobs created in Phases II and III would not induce a substantial population growth. No impact would result.

(Sources: 1, 2)

b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐

Discussion:
Implementation of the proposed project would result in the demolition of one existing vacant single-family residence. However, this demolition would not necessitate the construction of replacement housing elsewhere because the house is currently vacant and the subject property is not designated for residential land use in the *General Plan*. Therefore, impacts would be less than significant.

(Sources: 1, 2)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Discussion:
See discussion under Checklist Item XII.b., above. Although the proposed project would result in the demolition of an existing vacant single-family residence, it would not displace any people. No impact would result.

(Sources: 1, 2)

XIII PUBLIC SERVICE

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a. Fire protection?	☐	☐	☒	☐

Discussion:
The City of Lodi Fire Department would provide fire service to the project site. The Fire Department has four fire stations located within the City. The City's fire protection and established service ratios are based on the full build-out of the City's *General Plan.* Given that the proposed project would be consistent with the *General Plan,* the project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities. Impacts would be less than significant.

(Sources: 1)

b. Police protection?	☐	☐	☒	☐

Discussion:
The City of Lodi Police Department would provide law enforcement services to the project site. The project site is located in the Heritage Patrol District, which encompasses many of the older residential neighborhoods in the City, as well as large business and industrial districts. The City's police protection, as well as established service ratios are based on the full build-out of the City's *General Plan.* Given that the proposed project would be consistent with the *General Plan,* the project would not result in substantial adverse physical impacts associated with the provision for new police protection services. Impacts would be less than significant.

(Sources: 1)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
c. Schools?	☐	☐	☐	☒

Discussion:
The proposed project would require no school services, nor would it create the need for new or expanded facilities. No impact would result.

(Sources: 1)

d. Parks?	☐	☐	☐	☒

Discussion:
The proposed Sweetener Distribution Center would not contribute to the demand on existing parks, nor require the dedication of additional parkland. No impact would result.

(Sources: 1)

e. Other public facilities?	☐	☐	☐	☒

Discussion:
Issues related to the provision of other public services have not been identified. Therefore, no impact would result.

(Sources: 1)

XIV RECREATION

Would the project:				
a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒

Discussion:
The proposed industrial project would not create additional demand for existing neighborhood or regional parks or other recreational facilities. No impact would result.

(Source: 1)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
b. Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Discussion:
The proposed project would not include the construction or expansion of recreational facilities, nor would it require the construction or expansion of recreational facilities. Therefore, no impact would occur.

(Source: 1)

XV TRANSPORTATION AND TRAFFIC

Would the project:				
a. Cause an increase in traffic, which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	☐	☒	☐	☐

Discussion:
KD Anderson and Associates, Inc., (KD Anderson) prepared a traffic study entitled, *Traffic Impact Analysis for the ADM Distribution Center*, dated October 2006, which evaluated existing and future traffic conditions and level of service (LOS) at the two-way stop controlled intersection at North Guild Avenue/Victor Road (State Highway 12). Traffic counts at this intersection during AM and PM peak hours were conducted on May 24, 2006, and intersection approach counts were conducted for a 24-hour period on October 3, 2006. As shown in KD Anderson's Traffic Impact Analysis, side street traffic on the North Guild Avenue approaches to the intersection currently experience LOS C to E delays in the AM peak hour and LOS F in the PM peak hour. Victor Road approaches to the intersection currently experience LOS A in the AM and PM peak hours.

Project generated traffic is estimated in the Traffic Impact Analysis based on the operating characteristics of the proposed project (Phase I) and would include nine inbound trips to the site and nine outbound trips in both the AM and PM peak hours. KD Anderson projected that a majority of trips would travel south on North Guild Avenue and west on Victor Road, and a few trips would travel east on Victor Road. As shown in the Traffic Impact Analysis, additional traffic generated by the proposed project at the intersection of North Guild Avenue/Victor Road would be relatively minor consisting of one to five vehicles in the AM and PM peak hours. Furthermore, operating LOS at the intersection would remain unchanged with Phase I development of the project site.

While Caltrans has not established traffic thresholds of significance, the following threshold was used in this analysis:

Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact

- A significant project impact occurs at a State Highway study intersection when the addition of project-generated trips causes the peak hour level of service of the study intersection to change from acceptable operation (LOS A, B or C) to deficient operation (LOS D, E or F).

Based on the traffic threshold of significance above, the Traffic Impact Analysis indicates the addition of Phase I project-generated trips is forecast to result in no significant traffic impact at the North Guild Avenue/Victor Road intersection.

Although the North Guild Avenue approaches to the intersection of North Guild Avenue/Victor Road currently operate at a deficient LOS (LOS E or F) in the AM and PM peak hours, the intersection approach that would be utilized by project traffic would experience a minor incremental increase in delay consisting of: 1) no measurable increase in delay at the eastbound left turn approach; and 2) a one to two second increase in average delay at the southbound approach to the intersection in the AM and PM peak hours, respectively. Development of the project is not anticipated to add additional traffic to the northbound intersection approach.

The Traffic Impact Analysis indicates that signalization on the North Guild Avenue/Victor Road intersection is currently warranted based on PM peak hour approaches volumes on the side streets. It is noted that signalization of the intersection is currently warranted based on volumes at the northbound North Guild Avenue approach, not the southbound approach that would be utilized by the proposed project. In addition, Phase I project traffic would not significantly affect the need for a traffic signal at the intersection. Signalization of the North Guild Avenue/Victor Road intersection is not recommended for Phase I given that the project would result in no measurable increase in delay in one case and a minor increase in delay in another and signalizing the intersection would result in a reduction in LOS at west and eastbound approaches to the intersection (State Highway 12), which currently operates at LOS A.

Based on the above discussion, Phase I of the proposed project would not result in an increase in traffic, which would be substantial in relation to existing traffic load and capacity of the street system. Therefore, Phase I impacts would be less than significant.

With regard to the ten-year planning horizon, which includes projected State Highway 12 traffic (1 percent annual increase), development assumptions for vacant parcels on North Guild Avenue, and Phases II and III of the proposed project, the Traffic Impact Analysis concluded that significant impacts would occur at the North Guild Avenue/Victor Road intersection. According to the Traffic Impact Analysis, traffic volumes for the ten-year planning horizon would further increase delays at the North Guild Avenue approaches associated with access to Victor Road. An LOS F delay is projected for both North Guild Avenue approaches, and signalization of the intersection would be required to mitigate LOS F delays regardless of implementation of Phases II and III. Upon signalization, the intersection would operate at a satisfactory LOS C. Project related trips (Phases II and III) would incrementally increase delays and volume capacity ratios at the intersection under the ten-year planning horizon.

Based on the KD Anderson Traffic Impact Analysis, the ten-year planning horizon scenario would require signalization of the North Guild Avenue/Victor Road intersection in order to mitigate the deficient LOS. Given the addition of Phase II and III project related traffic at the subject intersection, a contribution toward mitigation would be required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact

RECOMMENDED MITIGATION MEASURE

Mitigation Measure XV.a. Prior to occupancy of Phase II of the proposed project, the project sponsor shall make a fair share contribution to be determined by the City at the time of project implementation toward the signalization of the North Guild Avenue/Victor Road intersection to the City of Lodi. Improvements made to the subject intersection would improve the level of service at the intersection, thereby reducing potential impacts to a less than significant level.

(Sources: 1, 8)

b. Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	☐	☐	☐	☒

Discussion:
The proposed project would not exceed a level of service standard established by the San Joaquin Congestion Management Agency. The project sponsor would be required to pay all fees and/or construct all necessary traffic improvements so that no roadways identified by the Congestion Management Agency Plan would be adversely impacts. No impact would result.

(Sources: 1, 8)

c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒

Discussion:
The proposed project would not have any impact on air traffic patterns because the project site is not located near an airport. No related impacts would occur as a result of the proposed project.

(Source: 1)

d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒

Discussion:
The proposed project's main access driveway would be provided on North Guild Avenue. The fifty-foot wide driveway would contain a landscaped median that would separate incoming and outgoing traffic. An additional driveway and corresponding access road would be provided on Victor Road, but would be only used by emergency vehicles. The driveway on North Guild Avenue would narrow to a twenty-four-foot wide, paved access road that would provide access to the distribution center. The access road would

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact

parallel the northern property boundary and turn in a southerly direction toward the facility. Trucks entering the facility would go through the truck wash before circling around to enter the loading/scale area. Trucks exiting the project site would utilize the same access driveway on North Guild Avenue. Employees would also enter the project site through the North Guild Avenue driveway and access road, and would park in one of the 27 proposed parking spaces. The project site plan and circulation movements would meet all Caltrans and City design standards and, therefore, would not create a hazard due to a design feature. No impact would result.

(Sources: 1, 2)

e. Result in inadequate emergency access?	☐	☐	☐	☒

Discussion:
Design plans for the proposed project indicate two access points for emergency vehicles. One driveway would be provided on North Guild Avenue, which would serve as the main ingress/egress point for project related traffic. An additional emergency vehicle access driveway and corresponding road would be provided off of Victor Road. Therefore, the proposed project would provide adequate emergency access to the site. There would be no impact.

(Source: 1)

f. Result in inadequate parking capacity?	☐	☒	☐	☐

Discussion:
According to Chapter 17.60 (Off-Street Parking) of the City of Lodi *Zoning Ordinance*, warehouse, industrial and manufacturing uses require one parking space for each 750 square feet of building area, or two parking spaces for every three employees in the largest shift, whichever is greater. In the first scenario, this would result in a parking requirement of 168 spaces or 14 spaces for Phase I (10,500 square feet ÷ 750), 127 spaces for Phase II (95,000 square feet ÷ 750) and 27 spaces for Phase III (20,000 square feet ÷ 750). According to the project sponsor, approximately 28 employees would be at the site during the largest shift (Phases I, II and III). Thus, in the second scenario, the parking requirement for all three phases would be 19 spaces (28 ÷ 3 x 2). As depicted on the project plans, a total of eight parking spaces would be provided for Phase I and a total of 27 spaces would be provided for the three phases of the proposed project.

The following mitigation measures would ensure that the project would meet the City's parking requirements and adequate parking would be provided.

RECOMMENDED MITIGATION MEASURE

Mitigation Measure XV.b. **Phase I** – The project sponsor shall provide 14 parking spaces for all buildings in Phase I.

Phases II and III - Prior to issuance of building permits, the project sponsor shall request a Variance to the modify the parking requirement to allow the calculation of parking for Phases II and III to be based on the maximum number of employees on-site during the largest shift. Plans submitted for a building permit

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact

shall reflect the number of parking spaces approved by the Planning Commission. Adequate areas shall be set aside so they can be utilized for additional parking in the future if and when a new or different use occupies the site or additional employees are hired.

(Sources: 1, 2)

g. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	☐	☐	☒	☐

Discussion:
The proposed project would not conflict with adopted policies, plans or programs supporting alternative transportation. No impact would result.

(Source: 1)

XVI UTILITIES AND SERVICE SYSTEMS

Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☒

Discussion:
The proposed project would not exceed wastewater treatment requirements of the Central Valley Regional Water Quality Control Board. No impact would result.

(Sources: 1, 3)

b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒

Discussion:
The project site is located in an urbanized area that contains existing water and wastewater infrastructure. The proposed project would not require the construction of new water or wastewater treatment facilities or the expansion of existing facilities because there is adequate capacity to serve the proposed Sweetener Distribution Center. No impact would result. Refer to Checklist Items XVI.d. and XVI.e. for further details.

(Sources: 1, 3)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐

Discussion:
The City of Lodi owns and maintains a variety of storm water facilities, including storm drain lines, pump stations, inlet catch basins, drainage ditches, and retention and detention facilities. City storm water is discharged to the Mokelumne River and the Woodbridge Irrigation Canal.

The proposed project would result in an increase in impervious surface. Therefore, the project would create additional storm water runoff. The proposed project would connect to the existing storm water drainage system located within North Guild Avenue. North Guild Avenue contains a 42-inch storm drain main line that connects to a 60-inch storm drain line within Turner Road. The storm drain line within Turner Road discharges directly into the Mokelumne River. Although the proposed project would increase storm water runoff, the existing drainage system was designed to handle future development consistent with build-out of the City's *General Plan*; therefore, the existing storm drain system has the capacity to accommodate the proposed project. The proposed project would not require or result in the construction of new or expanded storm water drainage facilities and impacts would be less than significant.

(Sources: 1, 3)

d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐

Discussion:
The City of Lodi Water Utility supplies and distributes potable water to the City and to some areas outside the City's jurisdiction. According to the City's *Urban Water Management Plan* (UWMP), the City currently has a net surplus in water supply given the City's current water entitlements and current water demand. In addition, year 2030 projections show the City with a net surplus in water supply. The UWMP analyzed future growth within the City based on land use assumptions depicted in the City's *General Plan.* The proposed project would not deviate from those land use assumptions; therefore, sufficient water supplies would be available and impacts would be less than significant.

(Sources: 1, 10)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐

Discussion:
The City of Lodi Public Works Department provides wastewater treatment for the City. Wastewater in the City is treated at the White Slough Water Pollution Control Facility (WSWPCF). The facility has been expanded to a design capacity of 8.5 million gallons (mgd) per day. However, the facility currently has permits to operate at 7.0 mgd per day. The WSWPCF currently treats approximately 6.2 mgd per day, which means the facility has a net surplus capacity of 0.8 mgd per day ("permitted" capacity). The facility's design capacity could accommodate an additional 2.3 mgd per day.

The proposed project would result in a small increase in demand on wastewater treatment. Given WSWPCF's capacity to treat additional wastewater flow, impacts would be less than significant.

(Sources: 1, 3)

f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐

Discussion:
Solid waste management and disposal within the City of Lodi is provided by Central Valley Waste Services. Solid waste is transported to a Transfer Station and Buy-Back Recycling Center. Waste is then deposited at the North County Landfill, which is owned and operated by San Joaquin County. The North County Landfill is a Class III facility that is permitted to accept 825 tons of solid waste per day. On average, the landfill receives 400 tons per day, and has a remaining lifetime capacity of approximately 6.0 million tons, which would equate to approximately 30 years.

The proposed project would generate an increase in the amount of solid waste. However, the North County Landfill has sufficient capacity to accommodate the proposed project's solid waste needs. Therefore, implementation of the proposed project would result in a less than significant impact.

(Source: 1)

g. Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	☒

Discussion:
The proposed project would comply with federal, state, and local statutes related to solid waste. No solid waste regulatory impacts would occur as a result of the project.

(Source: 1)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
XVII MANDATORY FINDINGS OF SIGNIFICANCE				
Would the project:				
a. *Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?*	☐	☒	☐	☐

Discussion:
As documented in this Initial Study, the proposed project would have less than significant impacts on biological and cultural resources with the incorporation of mitigation measures.

Implementation of the proposed project would result in the loss of open space habitat (row and field crops) and associated wildlife. Although no special status species were observed on the project site, suitable foraging and nesting habitat is present for some species. However, implementation of mitigation measures would reduce habitat loss and potential impacts to special status wildlife species to less than significant.

The project site contains potential historical resources. However, investigation of the historical resources determined that they are not eligible for the CRHR, nor do they constitute a cultural resource for the purposes of CEQA. Late Pleistocene Modesto Formation sediments underlie the project's vicinity and are known to be sensitive for paleontological and/or archeological resources. As a result, mitigation measures are recommended to reduce potential impacts to previously undiscovered paleontological and/or archeological resources to less than significant. In addition, potential impacts to previously undiscovered human remains would be less than significant with implementation of recommended mitigation measures.

(Sources: 1-12)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
b. *Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?*	☐	☐	☒	☐

Discussion:
The proposed project would develop the 14.94-acre site with a Sweetener Distribution Center. The project site is relatively small, most of the site would remain undeveloped, and the site is located in a predominately urbanized area. Therefore, incremental impacts associated with the proposed project would not be cumulatively considerable. Impacts would be less than significant.

(Sources: 1-12)

c. *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*	☐	☒	☐	☐

Discussion:
As discussed in this Initial Study, temporary air quality and noise impacts would be less than significant with the implementation of recommended mitigation measures. Therefore, the proposed project would not have significant environmental effects that would cause direct or indirect adverse effects to human beings.

Parking for future phases of the project would require that the project sponsor be granted a Variance to reduce the number of parking spaces from the number required by the City's parking standards. This would not have a significant impact on the environment due to the fact that ADM would still be required to provide adequate parking for the actual number of employees and customers at the facility.

(Sources: 1-12)

SECTION 4
REFERENCES

The following is a list of references used in the preparation of this document. Unless attached hereto, copies of all reference documents, reports, memorandums and letters are on file with the City of Lodi Community Development Department. Reference to publications by regional, state and federal agencies may be found with the agency responsible for providing such information.

1. City of Lodi, *General Plan 2007*, adopted June 12, 1991.

2. City of Lodi, *Municipal Code,* updated June 2006.

3. City of Lodi, *MapGuide*: http://mapguide.lodi.gov/.

4. San Joaquin Valley Air Pollution Control District, *Guide for Assessing and Mitigating Air Quality Impacts*, adopted January 10, 1998.

5. LSA Associates, *Biological Resources Evaluation*, November 2006.

6. LSA Associates, *A Cultural and Paleontological Resources Study for the Archer Daniels Midland Sweetener Distribution Center Project*, August 2006.

7. Kleinfelder, Inc., *Geotechnical Services Report Distribution Terminal Guild Avenue and Victor Road*, January 17, 2005.

8. KD Anderson and Associates, Inc., *Traffic Information for ADM Distribution Center, Lodi*, October 26, 2006.

9. City of Lodi, *Urban Water Management Plan*, adopted 2006.

10. San Joaquin County Office of Emergency Services, 2003. *Dam Failure Plan*, December 19.

11. State Department of Toxic Substances Control, *EnviroStor:* http://www.envirostor.dtsc.ca.gov/public/

12. State Water Resources Control Board, *GeoTracker*: http://www.waterboards.ca.gov/ust/cleanup/electronic_reporting/about.html