

## 4.0 CUMULATIVE IMPACTS

### 4.1 INTRODUCTION TO CUMULATIVE ANALYSIS

State CEQA Guidelines § 15130 requires that an EIR include a discussion of cumulative impacts “...when the project's incremental effect is cumulatively considerable, as defined in [State CEQA Guidelines] § 15065(c).” Cumulatively considerable effects are those “...incremental effects of an individual project... when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.” CEQA Guidelines § 15065(c). A lead agency need not consider an incremental effect as “cumulatively considerable” but does need to briefly describe its basis for concluding the incremental effect is not cumulatively considerable.

“The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great [a level of] detail as is provided for the effects attributable to the project alone. The discussion should be guided by standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact.” CEQA Guidelines § 15130(b).

### 4.2 CUMULATIVE PROJECTS CONSIDERED

The City of Lodi has an adopted Growth Management Plan for residential development (City of Lodi Municipal Code, Chapter 15.34). The growth management plan calls for the approved of residential units at a rate not to exceed two percent of annual population growth as forecast by the State Department of Finance. The growth limitation does not apply to commercial, industrial projects or other types of land uses besides residential.

This cumulative impact analysis will rely on the “list approach” of past, present, and probable future projects that the project may, in combination with the cumulative projects, produce related or cumulative impacts. The City of Lodi has identified the past, present, and probable future projects that, when considered with the effects of the project, may result in cumulative effects. The location of the cumulative projects are indicated on Exhibit 4-1 and described on Table 4-1.

#### Discussion of Cumulative Impacts

##### **Land Use and Planning**

The proposed project was determined, assuming approval of a general plan amendment, to be consistent with the planned land uses of the project site. The general plan amendment would change a small portion of PR property to NCC, consistent with the Westside Facilities Master Plan. It would comply with other relevant general plan goals and policies, as discussed in Section 3.2, herein. Analysis of key project features indicates that the project would conform to City of Lodi Zoning



**TABLE 4-1  
LIST OF CUMULATIVE PROJECTS**

Project Name	General Description
<b>Commercial/Retail</b>	
Shopping Center	<b>Description:</b> Development of a 345,000 sq.ft. retail outlet. ❖ 219,000 sq.ft. of a major national retail center ❖ 126,000 sq.ft. of small retail shops, gas station
Subtotal Commercial/Retail	Potential for the development of a 345,000 sq.ft. square foot shopping center.
<b>Residential</b>	
Sunwest [Phases 4-12]	<b>Description:</b> Development of remainder (i.e., 2 homes) of Phases 2-12 of a residential development. ❖ <i>Total Approved:</i> 178 ❖ <i>Finished Homes:</i> 176 <i>To Be Constructed or Currently Under Construction:</i> 2
Apple Orchard	<b>Description:</b> Development of remaining 3 units of housing in an approved residential development. ❖ <i>Total Approved:</i> 39 ❖ <i>Finished Homes:</i> 36 <i>To Be Constructed or Currently Under Construction:</i> 2
The Meadows II	<b>Description:</b> Development of housing unit on 1 remaining vacant lot in a residential development. ❖ <i>Total Approved:</i> 42 ❖ <i>Finished Homes:</i> 41 <i>To Be Constructed or Currently Under Construction:</i> 1
Mokelumne Village	<b>Description:</b> Development of housing unit on 1 remaining vacant lot in a residential development. ❖ <i>Total Approved:</i> 114 ❖ <i>Finished Homes:</i> 113 <i>To Be Constructed or Currently Under Construction:</i> 1
Rivergate Mokelumne	<b>Description:</b> Development of housing unit on 1 remaining vacant lot in a residential development. ❖ <i>Total Approved:</i> 71 ❖ <i>Finished Homes:</i> 70 <i>To Be Constructed or Currently Under Construction:</i> 1
Sunwest 14	<b>Description:</b> Development of housing unit on 7 remaining vacant lots in a residential development. ❖ <i>Total Approved:</i> 59 ❖ <i>Finished Homes:</i> 51 <i>To Be Constructed or Currently Under Construction:</i> 8

Project Name	General Description
Bangs Ranch	<p><b>Description:</b> Development of housing unit on 1 remaining vacant lot in a residential development.</p> <ul style="list-style-type: none"> <li>❖ <i>Total Approved:</i> 106</li> <li>❖ <i>Finished Homes:</i> 105</li> </ul> <p><i>To Be Constructed or Currently Under Construction:</i> 1</p>
Century Meadows 3	<p><b>Description:</b> Development of housing units on 17 remaining vacant lots in a residential development.</p> <ul style="list-style-type: none"> <li>❖ <i>Total Approved:</i> 142</li> <li>❖ <i>Finished Homes:</i> 125</li> </ul> <p><i>To Be Constructed or Currently Under Construction:</i> 17</p>
Century Meadows 4	<p><b>Description:</b> Development of housing units on 77 lots in a residential development.</p> <ul style="list-style-type: none"> <li>❖ <i>Total Approved:</i> 137</li> <li>❖ <i>Finished Homes:</i> 60</li> </ul> <p><i>To Be Constructed or Currently Under Construction:</i> 77</p>
Lodi West	<p><b>Description:</b> Development of housing units on 26 lots in a residential development.</p> <ul style="list-style-type: none"> <li>❖ <i>Total Approved:</i> 375</li> <li>❖ <i>Finished Homes:</i> 349</li> </ul> <p><i>To Be Constructed or Currently Under Construction:</i> 26</p>
Richards Ranch	<p><b>Description:</b> Development of housing units on 2 lots in a residential development.</p> <ul style="list-style-type: none"> <li>❖ <i>Total Approved:</i> 49</li> <li>❖ <i>Finished Homes:</i> 47</li> </ul> <p><i>To Be Constructed or Currently Under Construction:</i> 2</p>
Towne Ranch	<p><b>Description:</b> Development of housing units on 68 lots in a residential development.</p> <ul style="list-style-type: none"> <li>❖ <i>Total Approved:</i> 402</li> <li>❖ <i>Finished Homes:</i> 334</li> </ul> <p><i>To Be Constructed or Currently Under Construction:</i> 68</p>
Riverpointe	<p><b>Description:</b> Development of housing units on 19 lots in a residential development.</p> <ul style="list-style-type: none"> <li>❖ <i>Total Approved:</i> 43</li> <li>❖ <i>Finished Homes:</i> 24</li> </ul> <p><i>To Be Constructed or Currently Under Construction:</i> 19</p>
Bridgetowne	<p><b>Description:</b> Development of housing units on 11 lots in a residential development.</p> <ul style="list-style-type: none"> <li>❖ <i>Total Approved:</i> 140</li> <li>❖ <i>Finished Homes:</i> 129</li> </ul> <p><i>To Be Constructed or Currently Under Construction:</i> 11</p>

Project Name	General Description
Sasaki	<p><b>Description:</b> Development of housing units on 93 lots in a residential development.</p> <ul style="list-style-type: none"> <li>❖ Total Approved: 93</li> <li>❖ Finished Homes: 0</li> </ul> <p>To Be Constructed or Currently Under Construction: 93</p>
Beckman	<p><b>Description:</b> Development of housing units on 46 lots in a residential development.</p> <ul style="list-style-type: none"> <li>❖ Total Approved: 46</li> <li>❖ Finished Homes: 0</li> </ul> <p>To Be Constructed or Currently Under Construction: 46</p>
Perlegos	<p><b>Description:</b> Development of housing units on 45 lots in a residential development.</p> <ul style="list-style-type: none"> <li>❖ Total Approved: 50</li> <li>❖ Finished Homes: 5</li> </ul> <p>To Be Constructed or Currently Under Construction: 45</p>
Almond Wood Estates	<p><b>Description:</b> Development of housing units on 74 lots in a residential development.</p> <p>Tentative map submitted and awaiting approval.</p>
Legacy Estates	<p><b>Description:</b> Development of housing units on 77 lots in a residential development.</p> <p>Tentative map submitted and awaiting approval.</p>
Subtotal Residential	<p>Potential development of up to 420 approved, additional housing units.</p>

Ordinance provisions. The proposed shopping center would be of similar character to retail uses that exist in the project vicinity along Highway 12. Consequently, the project would not contribute to cumulatively significant land use and planning impacts. (Less Than Significant Cumulative Land Use and Planning Impacts).

**Transportation/Traffic**

The traffic analysis presented in Section 3.2 of this EIR indicates that the project will contribute minimally to cumulative traffic impacts. The LOS of study intersections would remain unchanged from cumulative (no project) conditions after the project implementation (refer to discussion under Impact 3.2-B). The project could result in some inconsistencies with some City of Lodi plans which, should other cumulative projects be approved in the area, could result in a cumulative impact so consistency with City plans. However, mitigation measures 3.2-F.1 through 3.2-F4 would reduce this project potential to a less than significant effect and, therefore, no cumulative impacts would result. As discussed in Impact 3.2-G, the project would be consistent with City of Lodi General Plan policies. Therefore, the project would not contribute to cumulative impacts regarding inconsistencies with City

of Lodi relevant general plan policies. (Less Than Significant Cumulative Transportation/Traffic Impacts).

### **Air Quality**

The proposed project, in combination with cumulative projects, would generate a substantial amount of fugitive dust emissions that would be considered significant. However, the project's contribution to these impacts would be reduced to a less than significant level with the application of Mitigation 3.3-A.

Significant cumulative impacts would also occur during construction related to the Construction would also result in exhaust emissions of CO, ROG, NO<sub>x</sub>, SO<sub>x</sub>, and PM<sub>10</sub> from the operation of diesel-powered heavy equipment during grading and construction and for the import of soil. These emissions would also be generated through the emissions of vehicles used by construction workers. Although mitigation measure 3.3-A would reduce some of the construction-related impacts, there are no feasible mitigation measures available to reduce NO<sub>x</sub> emissions to a less than significant level and a significant and unavoidable construction-related NO<sub>x</sub> emissions impact would remain. (Significant and Unavoidable Impact Regarding NO<sub>x</sub> Emissions).

Long term operational emissions of the project plus cumulative impacts would result in a significant impact regarding ROG and NO<sub>x</sub>. Customers of the Vintner's Square Shopping Center will rely mostly on the use of vehicles to get to and from the center. The shopping center is dependent on the use of power for its operation. Consequently, there are not feasible mitigation measures to reduce this impact to a less than significant level. (Significant and Unavoidable Impacts Regarding ROG and NO<sub>x</sub> Emissions).

The project would not contribute to CO Hot spot and would be consistent with the Air Quality Attainment Plans (AQAP). (Less Than Significant Impacts Regarding Consistency with AQAP).

### **Noise**

Noise associated with grading of the project site and construction of the project uses would generally be limited to the site and immediate periphery. Noise would be generated by vehicles bringing construction crews to and from the site, but this noise would be limited to select times of the day (e.g., to work, to and from lunch sites, from work to home. Once the project is constructed and is in operation, it would draw shoppers and customers from outlying areas. These vehicle trips would increase local and cumulative ambient noise levels on roadways leading to the project site. As indicated in Impacts 3.4-B and 3.4-D, however, these impacts would be considered less than significant. (Less Than Significant Cumulative Construction Noise Impacts).

Operation of equipment on and near the shopping center uses would generate an increase in stationary noise. These sources of noise would include loading and unloading of materials and supplies to the uses of the shopping center, operation of mechanical equipment (e.g., air conditioners) and vehicular noise in parking areas. The increase in stationary noise was determined to be a significant impact of the project. However, since other cumulative projects are not located in the vicinity of the project, this impact would not be considered a cumulatively significant effect of the project. (Less Than Significant Cumulative Stationary Source Noise Impacts).

## Secondary Socioeconomic Effects

The proposed project would introduce new retail uses to the City of Lodi. The new uses would generate some competition with other stores in the City of Lodi. However, the economic analysis indicated that the competition would not be substantial with Downtown uses since they are of different character and not substantial enough to generate secondary effects such as store closures, increased crime or blight. Similar less than significant findings were determined for Vintner's Square Shopping Center competition with other established retail areas in the City of Lodi. Since the economic analysis was conducted for the Lodi "market area" these less than significant secondary economic effects would be the result of the proposed project and of the cumulative area. (Less Than Significant Cumulative Secondary Socioeconomic Effects Impacts).

## Cultural Resources

The project itself would not alter historic resources identified in the project vicinity, nor impact known prehistoric resources, and the site and vicinity are not considered to be located in an area of "cultural resources sensitivity." The closest prehistoric burial site is located over a mile south west of the project site. This burial site has been documented as having been destroyed in 1929. A number of historic structures have been identified within a two-mile radius of the project site, though none are located on site, or on the property across Highway 12 where the other planned retail center is proposed. The property on which the planned retail center would be located across Highway 12 from the proposed project site was included in the survey area for the cultural resources assessment that was conducted for the proposed project site. No cultural or historic artifacts were located on the site. It is expected that the retail center would not result in a significant impact with regards to cultural resources. No cumulative impact associated with cultural or historic resources is expected. (Less Than Significant Cumulative Cultural Resources Impacts).

## Aesthetics/Visual Resources

The proposed project, in combination with cumulative projects, would result in less than significant cumulative aesthetics impacts. The proposed project was determined to result in less than significant impacts regarding changes to the existing visual character project area since views of the project would not significantly alter views in the area. The project is proposed at the juncture, along Highway 12, of undeveloped, largely vacant or rural areas and intensive urban development, largely characterized by retail and shopping center uses. The largely vacant, rural areas are situated west of the site, along Highway 12, while the intensive retail/shopping areas are to the east. Consequently, both land types of land uses are within the visual range of any vehicles passing along Highway 12. The planned retail center across Highway 12 from the proposed project site would have similar impacts. When viewed cumulatively, these projects would not significantly alter views in the area, primarily due to the heavily urbanized area existing east of the project site, along Highway 12 (Kettleman Lane) and Lower Sacramento Road. Existing views would not be significantly altered.

The project, through the introduction of perimeter landscaping, would limit effects of glare that may result from the reflection of sunlight off of vehicles parked at the center and circulating through the site. Additional glare in the immediate area would come from the development of the planned retail center across Highway 12 from the project site. When viewed cumulatively, the amount of glare generated by these two projects would not have a substantial adverse effect that would result in a

significant impact. The same can be said for light generated by the projects. The location within the City of Lodi and surrounding light-emitting land uses results in an environment in which introduction of light generated by these two retail centers would be imperceptible beyond existing levels.

Other cumulative projects would not result in combined aesthetic effects with the proposed project because they are located throughout the City of Lodi, and not within the immediate visual area of the proposed project, and are projects that are visually compatible with surrounding land uses and the rest of the City of Lodi. (Less Than Significant Cumulative Aesthetic/Visual Resources Impacts).

### **Biological Resources**

Several regional planning efforts that address the protection of the diversity of biological resources have been undertaken in the area. The most significant of these is the creation in 2000 of the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP), the stated purpose of which is to provide a strategy for balancing the conversion of open space to non-open space uses with the need for the long-term management of plant, fish and wildlife species, especially those that are currently listed, or may be listed in the future, under the Federal Endangered Species Act (ESA) or the California Endangered Species Act (CESA). The City of Lodi is a participating agency in the SJMSCP. The SJMSCP resulted from the San Joaquin Council of Governments' efforts to develop a regional approach to managing the biological resources of the County. The site was identified as non-native grasslands and forbs habitat. Identification of the habitat on the project site and payment of SJMSCP fees would be both a project and cumulative mitigation for the potential loss of species within the County. The project applicant would be required to pay a sum of \$845 per acre, based on the habitat type and no further mitigation would be required.

The proposed project was also identified as potentially providing Swainson's hawk foraging habitat. However, abundant Swainson's hawk foraging habitat exists all along Highway 12 between the City of Lodi and Fairfield, as well as other territories throughout the County. This impact was considered less than significant for the project and, since abundant habitat is abundantly available throughout the County, would be a less than significant cumulative impact. (Less Than Significant Cumulative Biological Resources Impacts).

### **Drainage and Water Quality**

The proposed project would incorporate use of a temporary detention basin to capture stormwater runoff from the project site. The temporary detention basin would have the capacity to capture the 48-hour, 10-year volumes, pursuant to City of Lodi requirements. Stormwater will be released from the detention basin into a proposed underground pipe of 42" diameter. This pipe is oversized for conveyance of project stormwater and will be used to "meter" storm flows into the existing municipal storm drainage system. The use of the temporary detention basis and oversized underground pipe to meter our storm flow has been reviewed by the City of Lodi Public Works Department as providing sufficient drainage for the proposed project. By providing sufficient storm water protection to the project site, the project would not result in cumulative storm water drainage impacts. Urban pollutants may also be generated by the proposed project in the form of oil and grease and other materials that drain off of the project site during storm flows. These pollutants will be reduced through use of the temporary detention basin, allowing for settlement of heavy materials, and use of pervious materials where feasible for pedestrian walkways, non-vehicular circulation areas and overflow parking areas.

Moreover, Mitigation Measure 3.9-B will require the project applicant (or construction manager) to implement Best Management Practices (BMPs) to the maximum extent possible. The project would also be required to conform to NPDES Permit requirements and the applicant would be required to develop and obtain City approval of a SWPPP (Mitigation Measure 3.9-C). Use of the temporary detention basin and oversized underground pipe to “meter” storm water flows, and incorporation of Mitigation Measures 3.9-B and 3.9-C would prohibit project effects from substantially contributing to cumulative drainage and water quality impacts and a less than significant impact would result. (Less Than Significant Cumulative Drainage and Water Quality Impacts).

### **Public Services**

The effects of the proposed project on fire and police services were evaluated in Section 3.10 of this EIR. As discussed in that section, the City of Lodi has a Class 3 ISO fire rating, indicating the Fire Department is strategically distributed throughout the City and has more than adequate personnel, equipment and expertise to serve the current population. Given the potential development capacity of the cumulative projects and their location, it is anticipated that the Fire Department would continue to meet the Class 3 ISO rating and that less than significant cumulative fire service impacts would result.

The cumulative projects would allow for the construction of approximately 345,000 s.f. of commercial retail use and approximately 420 residential units. Most of the residential units would represent the development of on-going projects which are already served by the police department. The proposed retail use would be in the vicinity of the proposed project. The existing police station is centrally located, providing the ability of the police department to respond to emergency calls in acceptable response times. The new police station is due to be opened by December 2003 and would be situated in the same central City location. Given the project's less than significant project impacts on the existing police services and that additional police capacity will be available in short time, it is anticipated that the project would not contribute to a substantial adverse impact to cumulative police services and that a less than significant impact would result. (Less Than Significant Cumulative Public Services Impacts).

### **Public Utilities**

The effects of the proposed project on electrical service, natural gas supplies, water and wastewater services, stormwater drainage facilities, and solid waste disposal were evaluated in Section 3.11 of this EIR. As discussed in that section, the Lodi Electric Utility, the City of Lodi's electricity provider, has adequate electrical supplies available to serve the proposed project without compromising service to existing customers. The City also has plans to construct an electrical substation and new 60-kilovolt pole lines in the area to accommodate future development in the vicinity of the site. The proposed project site is located within the boundaries of the City's Westside Facilities Master Plan, which identified a substantial amount of anticipated growth in this area of Lodi. As growth of this nature is anticipated and planned for in this area of Lodi and the proposed project is consistent with the Westside Facilities Master Plan, it is expected that this project would have a less than significant cumulative impact with relation to electrical service and supplies.

Pacific Gas and Electric (PG&E) would provide natural gas services to the proposed project. The project would connect to an existing gas lines located on South Lower Sacramento Road. According to the 2002 Natural Gas Report prepared by the California Gas and Electric Utilities, PG&E

anticipates that sufficient supplies of natural gas will be available from a variety of sources at market-competitive prices to meet existing and projected market demands in its service area through the year 2022. These projections and the anticipated sufficiency of natural gas supplies through 2022 indicate that this project would not have a significant cumulative impact related to natural gas supplies.

Proposed on-site sewer lines would convey wastewater generated by individual businesses to an 18-inch sewer line located along South Lower Sacramento Road. The 18-inch sewer line flows south and connects to a 42-inch sewer main that flows southwest to the White Slough Water Pollution Control Facility (WSWPCF). According to Fran Forkas, Water and Wastewater Superintendent for the City of Lodi, the 18-inch and 42-inch sewer lines are operating well below their capacity. These lines would have more than enough capacity to serve the proposed shopping center. The WSWPCF currently treats approximately 6.2 million gallons of wastewater per day. The facility is permitted to treat 7.0 million gallons per day. The facility can treat an additional 0.8 million gallons of wastewater per day. According to Fran Forkas, Water and Wastewater Superintendent for the City of Lodi, the WSWPCF has adequate permitted capacity to serve growth and development within the City, including the proposed project, for the next 6 years. In addition, the City of Lodi is currently planning and designing a variety of improvements that will allow the City to increase the permitted capacity of the WSWPCF from 7.0 to 8.5 million gallons per day. The City's ability to accommodate the proposed project without meeting or exceeding capacity and its existing plans to increase capacity indicate the City of Lodi's ability to accommodate the wastewater needs of the proposed project without compromising service of existing clients or requiring the prohibition of new clients.

The proposed project site would be served by groundwater. Existing wells and wells that are currently under construction will provide groundwater to the site. The City of Lodi 2001 Urban Water management Plan projects the increase in water demand assuming ongoing development as provided in the City of Lodi General Plan. According to Wally Sandelin, City Engineer for the City of Lodi, the water demand associated with the proposed project is substantially in conformance with the forecast water demand under the current General Plan and the 2001 Urban Water Management Plan. According to Mr. Sandelin, the new wells that are under construction will insure the City's ability to serve the water demand of existing customers, the proposed project, and other future projects in the City under normal, single-dry, and multiple-dry water years. Therefore, the Lodi Water Utility would have adequate water supplies to serve the proposed project, existing customers, and future projects.

As previously mentioned, the proposed project site is within the area of the adopted Westside Facilities Master Plan which addressed the facility needs to accommodate future anticipated growth in the western area of the City. The project includes a temporary stormwater detention basin designed in adherence to City policies and consistent with the Westside Facilities Master Plan. As stated in Section 3.11, the proposed project would have a less than significant impact with relation to stormwater drainage facilities. As the stormwater drainage needs for growth outlined in the General Plan have been assessed the needs of the proposed project and similar anticipated growth have been accounted for and addressed in the Westside Facilities Master Plan. This project is consistent with the plan and would not impede its implementation, therefore no cumulative impact related to stormwater drainage is anticipated.

The proposed shopping center would generate solid waste that is typically associated with large retail shopping centers. Non-recyclable waste generated by the proposed project would be disposed at the North County Landfill. The landfill is currently operating below capacity, and can accept an

additional 425 tons of waste per day. The landfill has the capacity to accept the additional waste generated by the proposed project (estimated at 3.7 to 6.8 tons per day before recycling). In addition, the project would not require the landfill to expand or operate below current standards. Much of the waste generated by the proposed project, including cardboard boxes, packaging materials, paper products, glass, and aluminum cans, could be recycled. Central Valley Waste Services (CVWS) offers recycling services for commercial customers. Cardboard boxes, plastic, aluminum cans, and other recyclable containers and materials can be placed in mixed recycling bins at commercial sites. This project would be conditioned to contract with CVWS to provide recycling service and to provide onsite recycling areas. It is anticipated that similar project in the area would be held to similar conditions. Based on the landfills unused capacity compared to the waste generation rates of the proposed project, the North County Landfill would have capacity available to serve the proposed project and future projects. In addition, the emphasis and encouragement of utilizing recycling services would decrease the amount sent to the landfill. The proposed project would result in a less than significant cumulative impact related to solid waste disposal.

The infrastructure needs for the Westside area of the City of Lodi were addressed in the City's Westside Facilities Master Plan. Service providers, i.e. solid waste, electricity, natural gas, wastewater, water, have anticipated growth of this nature in this area and planned for future growth. The project would result in a less than significant cumulative public utilities impact. (Less Than Significant Cumulative Public Services Impacts).

## Geology and Soils

**IMPACT 4.0-A Loss of Prime Farmland: The project, in conjunction with cumulative projects, would result in a significant cumulative impact regarding the loss of prime farlands soils. (Cumulatively Significant and Unavoidable Impact)**

The other projects in the Lodi area are within the Lodi city limits, and generally occur towards the outer fringes. It is unknown whether or not the projects currently underway, i.e. the residential subdivisions, occurred on prime farmland soils, but when viewing their location within the urbanized area of the City of Lodi it is unlikely that these projects are taking place on lands that could support viable agricultural operations. Given the close proximity and density of commercial and residential uses surrounding these project sites it is highly likely that any agricultural operations on these lands would result in significant land-use conflicts. The retail center located across Kettleman Lane from the proposed project site would also take place on potential agricultural land, albeit surrounded by urban uses, which would result in the loss of 35 acres of prime farmland. This proposed project would result in the conversion of approximately 29 acres of prime farmland. The property has not been in active agricultural production in the past 5 years and is surrounded by urban land uses on three sides. While the appropriateness and viability of an agricultural operation on this property remains in question, it is clear the project would result in the direct conversion of 29 acres of prime farmland. In conjunction with the retail outlet across Kettleman Lane, approximately 54 acres would be lost. The loss of Prime Farmland within the City of Lodi's General Plan study area was evaluated and identified as a significant and unavoidable impact in the City of Lodi General Plan EIR (City of Lodi, 1988). The impact would remain significant and unavoidable. (Significant and Unavoidable Impact)

### **Hazards and Hazardous Materials**

Based on a Phase I site assessment prepared for the site in August of 2002, the site was determined to potentially contain pesticide residue on on-site soils, petroleum residue in soils, and the potential for the discovery of underground asbestos pipes. Mitigation measures 3.13-A, 3.13-B and 3.13-C are required and would reduce these impacts to a less than significant level. The only effects that could potentially combine with cumulative projects are seepage of soil pollutants into the soil, eventually being deposited into groundwater or be taken off the site in storm water runoff. However, the quantities discussed in the Phase I site assessment are very small to begin with (possible remainder of past agricultural activities.) Moreover, required mitigation measures would reduce project effects to a less than significant impact thereby avoiding the potential combination of impacts with cumulative projects. Consequently, less than significant cumulative impacts would result. (Less Than Significant Cumulative Hazards and Hazardous Materials Impacts).