

Public Review Draft

Initial Study/ Mitigated Negative Declaration

For the

City of Lodi – Police Training Facility Project



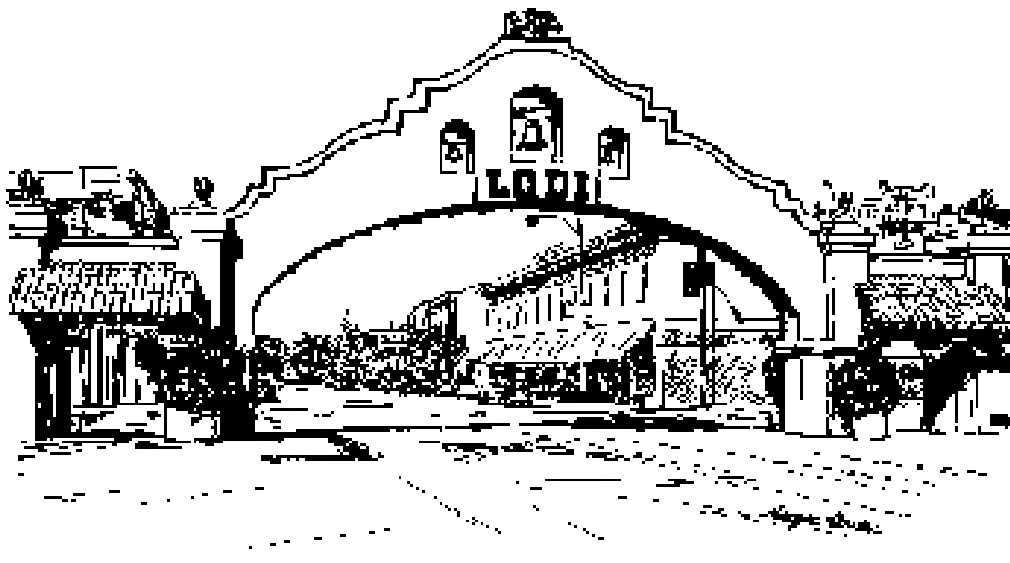
February 2020

PUBLIC REVIEW DRAFT

INITIAL STUDY/ PROPOSED MITIGATED NEGATIVE DECLARATION

FOR THE

THE CITY OF LODI – POLICE TRAINING FACILITY PROJECT



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

February 2020

**NOTICE OF AVAILABILITY AND NOTICE TO OF INTENT
TO ADOPT A MITIGATED NEGATIVE DECLARATION FOR THE
CITY OF LODI
LODI POLICE TRAINING FACILITY PROJECT**

The City of Lodi has prepared an Initial Study pursuant to California Environmental Quality Act (CEQA) and the CEQA Guidelines (Public Resources Code, Division 13 and California Code of Regulations, Title 14, Chapter 3) evaluating the potential environmental impacts of the City of Lodi Police Training Facility Project. The City proposes to adopt a Mitigated Negative Declaration ("MND") because the Project construction and operation would not have a significant effect on the environment. This MND and the Initial Study describe the reasons that this project will not have a significant effect on the environment and, therefore, does not require the preparation of an environmental impact report under CEQA.

FILE NUMBER: 2020-01 MND

PROJECT TITLE: CITY OF LODI POLICE TRAINING FACILITY PROJECT

PROJECT LOCATION: The Project is located at the White Slough Water Pollution Control Facility (WPCF) in unincorporated northern San Joaquin County, approximately 6.5 miles west of the City of Lodi. The WPCF is located in a primarily agricultural area, adjacent to Interstate 5 and 1.2 miles south of Highway 12. The WPCF address is 12751 North Thornton Road, Lodi, California, and consists of 1,026.27 acres of land, including the treatment facilities, the existing recycled water storage facilities, the newly built western expansion ponds (Proposition 84 Ponds), and surrounding City-owned agricultural fields. The project location is adjacent north of the Proposition 84 Ponds within the facilities agricultural land (APN: 055-150-29). The City of Lodi General Plan designates the WPCF as "Industrial" and the surrounding City-owned agricultural fields where the expansion pond is proposed as "Public/Quasi-Public". A regional and project location map are included as Figures 1 and 2, respectively.

PROJECT DESCRIPTION: The City of Lodi (City) is proposing to provide the City of Lodi Police Department (PD) with a police training facility. The City of Lodi Police Department currently uses other City and Agency facilities for training; the purpose of this project is to provide the necessary long-term police training facility required in order to properly train and certify the Department on a long-term, consistent basis, as well as potentially offer some "open to the public" opportunities such as scheduled hunter safety courses or local shooting club competition space. The Training Facility proposes to include a classroom training facility, short, medium, and long-range shooting ranges, a defensive driving training course, a detonation area and bunker, as well as a mobile restroom, storage containers, parking stalls, an emergency access lane, target berms, improvements to the existing gravel road, lighting for night time use of the facility, and site fencing with access through sliding gates. Other associated facility improvements include hardscape, limited greenscape, and landscaping.

The proposed Project excavation depths will be shallow (approximately 6 to 18 inches below grade). The on-site soil has been determined suitable as engineered fill; no borrow will be imported and no spoils will be removed.

The proposed Project is still in the design phase (15 to 25 Percent Design). The full conceptual design draft set documents are available for review in Appendix B; project conceptual design (Figure 3) draft items as of July 2019, include, the following:

- (3) 25-yard shooting ranges
- (1) 75-yard shooting range
- (1) 100-yard shooting range
- (1) 200-yard shooting range
- (1) 300-yard shooting range
- (3) 40'x8' Storage containers
- (1) 40'x24' training classroom
- Detonation area
- 12'x12' Bunker
- 55 parking stalls
- Emergency access lane
- Existing road improvements
- Site fencing/access gates
- Night lighting
- Hardscape/greenscape
- Landscaping

The proposed Training Facility will be located north of the newly built storage ponds and will occupy approximately 20 acres total (Figure 2). The proposed project (including potential driving course) is located within the study area(s) for the White Slough Water Pollution Control Facility Storage Expansion and Surface, Agricultural, and Groundwater Supply Improvement Project (Prop 84 Ponds) Initial Study/Mitigated Negative Declaration, adopted on March 15, 2017. Therefore, the previous IS/MND will be referenced throughout the IS/MND where appropriate; the Notice of Determination (NOD) for the Prop 84 Ponds IS/MND is provided as Appendix A. Previous study areas for the Prop 84 Ponds compared to Lodi PD Training Facility location(s) are provided as Figure 4 to illustrate project overlap.

PUBLIC REVIEW PERIOD: As mandated by State law, the minimum public review period for this document is 30 days. The proposed Mitigated Negative Declaration will be circulated for a 30-day public review period, beginning on **Friday, February 14, 2020** and ending on **Sunday, March 15, 2020**. Copies of the Draft Negative Declaration are available for review at the following locations:

- **Community Development Department**, 221 West Pine Street, Lodi, CA 95240;
- **Lodi Public Library**, 201 West Locust Street, Lodi, CA 95240; and
- **Online at** http://www.lodi.gov/com_dev/EIRs.html


Any person wishing to comment on the Initial Study and proposed Negative Declaration must submit such comments in writing **no later than 5:00 pm on Sunday, March 15, 2020** to the City of Lodi at the following address:

Paul Junker, Contract City Planner
City of Lodi
P. O. Box 3006
Lodi, CA 95241

Facsimiles at (209) 333-6842 will also be accepted up to the comment deadline (please mail the original). For further information, contact Paul Junker, Contract City Planner, at (209) 333-6711.



Paul Junker, Contract City Planner



Date

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APPENDIX A – Previous Prop 84 Ponds Project NOD

APPENDIX B – Conceptual Design – Draft Document

APPENDIX C – SJCOG Review Form

APPENDIX D – CalEEMod

APPENDIX E – Biological Assessment Report

APPENDIX F – Preliminary Geotechnical Report

1. PROJECT TITLE

City of Lodi – Police Training Facility Project

2. LEAD AGENCY NAME AND ADDRESS

City of Lodi
Public Works Department
221 West Pine Street
Lodi, CA 9540

3. CONTACT PERSONS

Paul Junker: 209-333-6711

4. PROJECT LOCATION

The Project is located at the White Slough Water Pollution Control Facility (WPCF) in unincorporated northern San Joaquin County, approximately 6.5 miles west of the City of Lodi. The WPCF is located in a primarily agricultural area, adjacent to Interstate 5 and 1.2 miles south of Highway 12. The WPCF address is 12751 North Thornton Road, Lodi, California, and consists of 1,026.27 acres of land, including the treatment facilities, the existing recycled water storage facilities, the newly built western expansion ponds (Proposition 84 Ponds), and surrounding City-owned agricultural fields. The project location is adjacent north of the Proposition 84 Ponds within the facilities agricultural land (APN: 055-150-29). The City of Lodi General Plan designates the WPCF as “Industrial” and the surrounding City-owned agricultural fields where the expansion pond is proposed as “Public/Quasi-Public”. A regional and project location map are included as Figures 1 and 2, respectively.

5. PROJECT SPONSOR'S NAME AND ADDRESS

City of Lodi, Public Works
221 W. Pine Street
Lodi CA 95240

6. PROJECT DESCRIPTION

The City of Lodi (City) is proposing to provide the City of Lodi Police Department (PD) with a police training facility. The City of Lodi Police Department currently uses other City and Agency facilities for training; the purpose of this project is to provide the necessary long-term police training facility required in order to properly train and certify the Department on a long-term, consistent basis, as well as potentially offer some “open to the public” opportunities such as scheduled hunter safety courses or local shooting club competition space. The Training Facility proposes to include a classroom training facility, short, medium, and long-range shooting ranges, a defensive driving training course, a detonation area and bunker, as well as a mobile restroom, storage containers, parking stalls, an emergency access lane, target berms, improvements to the existing gravel road, lighting for night time use of the facility, and site fencing with access through sliding gates. Other associated facility improvements include hardscape, limited greenscape, and landscaping.

The proposed Project excavation depths will be shallow (approximately 6 to 18 inches below grade). The on-site soil has been determined suitable as engineered fill; no borrow will be imported and no spoils will be removed.

The proposed Project is still in the design phase (15 to 25 Percent Design). The full conceptual design draft set documents are available for review in Appendix B; project conceptual design (Figure 3) draft items as of July 2019, include the following:

- (3) 25-yard shooting ranges
- (1) 75-yard shooting range
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- 12'x12' Bunker
- 55 parking stalls
- Emergency access lane
- Existing road improvements
- Site fencing/access gates
- Night lighting
- Hardscape/greenscape
- Landscaping

The proposed training facility will be an outdoor firing range located north of the newly built storage ponds and will occupy approximately 20 acres total (Figure 2). The proposed project (including potential driving course) is located within the study area(s) for the White Slough Water Pollution Control Facility Storage Expansion and Surface, Agricultural, and Groundwater Supply Improvement Project (Prop 84 Ponds) Initial Study/Mitigated Negative Declaration, adopted on March 15, 2017. Therefore, the previous IS/MND will be referenced throughout the IS/MND where appropriate; the Notice of Determination (NOD) for the Prop 84 Ponds IS/MND is provided as Appendix A. Previous study areas for the Prop 84 Ponds compared to Lodi PD Training Facility location(s) are provided as Figure 4 to illustrate project overlap.

Firearms Shooting Ranges:

Although final layout is to be determined, per the current design draft there are three proposed 25-yard shooting ranges that are positioned north-south and which will accommodate 10 shooting positions. The remaining ranges are expected to be oriented east west and include one 300-yard range with 10 shooting positions, one 200-yard range with 10 shooting positions, one 100-yard range with 20 shooting positions, and one 75-yard range with 10 shooting positions. The shooting ranges are all currently designed to be approximately 100 feet wide, with the exception of the 100-yard range, estimated to be approximately 200 feet wide.

All outdoor firearm shooting range target berms are currently designed to have a minimum of 2 feet thick ballistic sand to at least 8 feet high and protective eyebrows. All berms located on the back and side of the ranges will be at least 15 feet high with 2:1 slope. Each range will be separated by a ballistic wall and shooting bays will separate seating with baffles. There will be at least 10 feet high Hesco walls placed along the length of the firing ranges for safety and noise reduction. The ballistic sand layer would be an effective and easily maintained ammunition trap which can be sifted to sort and recover lead bullets. The most current Design Draft is included as Appendix B.

Defensive Driving Training Course:

The defensive driving training course will encompass approximately 4.5 acres of the site. It will be graded to between 1.0 and 1.5 feet below ground surface in order provide slope fill materials for the rest of the site. Operations related to the driving course will include an asphalt cover surface that will allow for evasive maneuver handling for speed and capture drills.

Detonation Area and Bunker:

A detonation area and associated bunker is proposed in the southwest portion of the training facility. The area will include a storage magazine capable of containing safely all detonation materials. In the event of an accidental discharge, the magazine would contain all explosive materials.

Project Access, Parking and Facility Structures:

The proposed project will utilize an existing gravel road as access located north of the Training Facility which is connected to the entrance to the White Slough Water Pollution facility, off of I-5 Frontage Road. There are currently 55 parking stalls on compacted gravel planned for the project.

The structures (one classroom facility and one mobile restroom) will be portable structures. The entire site will be fenced for security and there will be the appropriate amount of nighttime lighting for safety.

Utilities:

The Training Facility will utilize portable toilets and a bottled potable water supply service for all occupant use. Additional water for dust mitigation, area cleaning, or landscape maintenance would be provided from the waste treatment plant as needed.

The project area naturally collects, contains, and conveys stormwater from the existing area to the waste treatment facility. The proposed Training Facility would add a separate swale collection system similar to what is proposed in the Conceptual Site Layout Design Draft (Figure 3). Stormwater runoff from the firing range embankment area would be collected and tested for soluble metals (lead) analysis and monitoring. As needed, appropriate treatment would be used for soluble lead mitigation.

Operational Usage:

The Training Facility would accommodate approximately 40 police officers currently serving the City of Lodi. Typically, training would likely consist of small groups of officers training regularly once a week, twice per month. The Training Facility may be open to the public by reservation to accommodate gun safety courses and to host special training/competition events as needed; a maximum of approximately 80 users in a single day could utilize the range for special events, with approximately 20 users per day, including additional personnel such as instructors and safety officers, being a more reasonable assumption. It is not likely that all firing ranges would be utilized at once during any given training event.

Typical hours of operation would be during daytime hours, likely between 8:00 am and 5:00 pm unless specifically training for nighttime qualification requirements, which are generally only held once a year, during the fall or winter months when the sun sets earlier.

Training scenarios would vary depending on training being conducted. In general, the trainings would be similar to other firing ranges which would include safety briefings, instructor demonstrations, drills without live ammunition, drills with live ammunition, and debriefing with instructor. In addition to firing range training, law enforcement training would also consist of periodic explosives detonation training and defensive driver training, although on a less consistent per month basis.

Lead Hazard Management Plan

While the Training Facility is critical for the continued development and tactical training of the City of Lodi Police, responsible environmental stewardship of the project site is of utmost importance. The project draft design is currently at 15 to 25 percent completion. The final performance standards for the Training Facilities planning, construction, and operations will follow the United States Environmental Protection Agency (EPA) *Best Management Practices for Lead at Outdoor Shooting Ranges* manual published in June 2005. The City of Lodi Police Training Facility will develop and incorporate an effective Lead Hazard Management Plan with site-specific BMPs for lead conditions. Because specific BMPs to be implemented will be dependent on final draft designs, a site-specific lead management plan has not yet been developed. However, a comprehensive and effective lead management plan will be developed and followed, and will incorporate implementing BMPs from each of the following four steps:

1. Control and contain lead bullets and bullet fragments;
2. Prevent migration of lead to the subsurface and surrounding surface water;
3. Remove and recycle lead from ranges; and
4. Documentation and record keeping of lead management activities.

7. SURROUNDING LAND USES AND SETTING

The proposed Project is located at the City of Lodi's White Slough WPCF, in a primarily agricultural area. The surrounding area is designated Agricultural (AG-40) within the San Joaquin County General Plan. Bishop Cut, designated as Resource Conservation (OS/RC) is located west of the proposed Project. Wineries, crop fields, grape production, orchards and a dairy farm make up the uses in the surrounding area. Rural residential housing is located intermittently throughout the general vicinity, with the nearest residential housing located along N Thornton Road, approximately 0.5 miles northeast of the project location.

8. NECESSARY PUBLIC AGENCY APPROVALS

It is anticipated that the following "typical" permits and compliance may be needed for this Project:

- City of Lodi: Lead agency with responsibility for approving the proposed expansion pond. Preparation of a Stormwater Pollution Prevention Plan (SWPPP) to City of Lodi standards. Pollutant Discharge Elimination Permit (Stormwater/Erosion Control) issued by the City of Lodi.
- Central Valley Regional Water Quality Control Board (RWQCB): The owner or operator of any facility that is currently discharging waste to groundwater must follow

Waste Discharge Requirements (WDRs) obtained from the Central Valley RWQCB. If changes in the quantity or quality of a discharge or a change in the treatment process are proposed, amended WDRs are required.

- State Water Resources Control Board Division of Drinking Water (DDW): DDW approval of a Title 22 Engineering Report is required to support an amendment of the WDR incorporating the new storage and discharge facilities.
- United States Fish and Wildlife Service – Compliance with the Federal Endangered Species Act: Construction activities would not directly or indirectly adversely affect a federally listed species or its habitat (see Biological Resources section of this document for additional information). Therefore, the proposed project would not be required to obtain Section 7 clearance from the U.S. Fish and Wildlife Service prior to SRF loan commitment.
- State Historic Preservation Office – Compliance with the National Historic Preservation Act: There are no prehistoric or historic archaeological resources, historic properties, or resources of value to local cultural groups within the project area. Therefore, the proposed project would not be required to demonstrate to the satisfaction of the State Historic Preservation Office that the project complies with Section 106 of the National Historic Preservation Act (see Cultural Resources section of this document for additional information).
- Native American Heritage Commission: Compliance with Assembly Bill 52 (AB 52). Lead agencies consult with Native American tribes who have previously contacted the Lead Agency early in the CEQA planning process. Lead Agency was contacted by the Wilton Rancheria and Northern Valley Yokuts and notified them of the proposed Project (see Cultural Resources section of this document for additional information).
- San Joaquin Valley Air Pollution Control District (SJVAPCD): Air Quality mitigation permit for grading work.
- San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP): Annexation into the Habitat Conservation Plan.
- County of San Joaquin: Preparation of a SWPPP to County of San Joaquin (and City of Lodi) standards. Pollutant Discharge Elimination Permit issued by the County of San Joaquin (and City of Lodi).
- San Joaquin County Airport Land Use Commission: Subject to a Consistency Determination in accordance with the Airport Land Use Commission Plan, based on the Project location within the Kingdon Airport's area of influence.

9. PROJECT CONSTRUCTION

The project is currently in the conceptual design phase (15 to 25 percent). Due to the Prop 84 Pond construction activity, the Training Facility location has already been cleared of any vegetation and initial grading has occurred; all soil is anticipated to remain onsite. No borrow material will be imported from off-site and no spoils will be removed.

Project construction will primarily consist of the construction of the firing ranges, engineered swale systems, bunker and detonation areas, a gravel parking lot, and the defensive driver course. The restroom and office/classroom structures are portable units. Minor construction activities to accommodate utility connections, security fencing, lighting, and road

improvements are also planned. Improvements will be constructed in a phased manner as funding permits.

The Project has been designed to eliminate environmental impacts by requiring the following measures:

- Project design to meet City of Lodi and applicable San Joaquin County design standards.
- Air Quality Mitigation through SJVAPCD.
- Preparation of a Stormwater Pollution Prevention Plan (SWPPP) to County of San Joaquin and City of Lodi standards.
- Pollutant Discharge Elimination Permit (Stormwater/Erosion Control) issued by the County of San Joaquin and City of Lodi.

A Stormwater Pollution Prevention Plan (SWPPP) and an Erosion and Sediment Control Plan will be prepared and implemented to avoid and minimize impacts on water quality during construction and operations. Best management practices (BMPs) for erosion control will be implemented to avoid and minimize impacts on the environment during construction. A comprehensive site-specific Lead Management Plan will be implemented prior to operation.

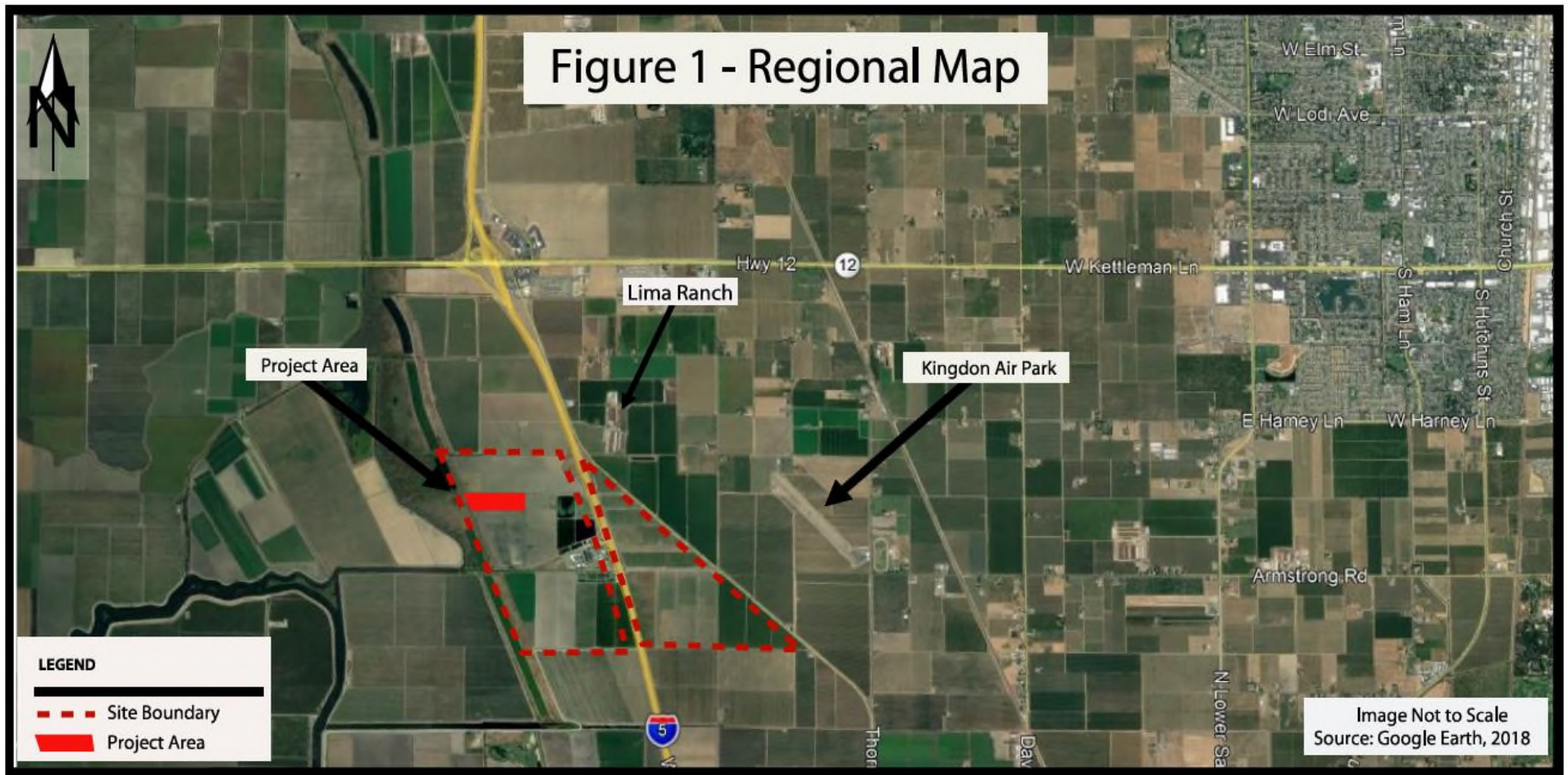


Figure 1 - Regional Map



Figure 2 – Proposed Project Area

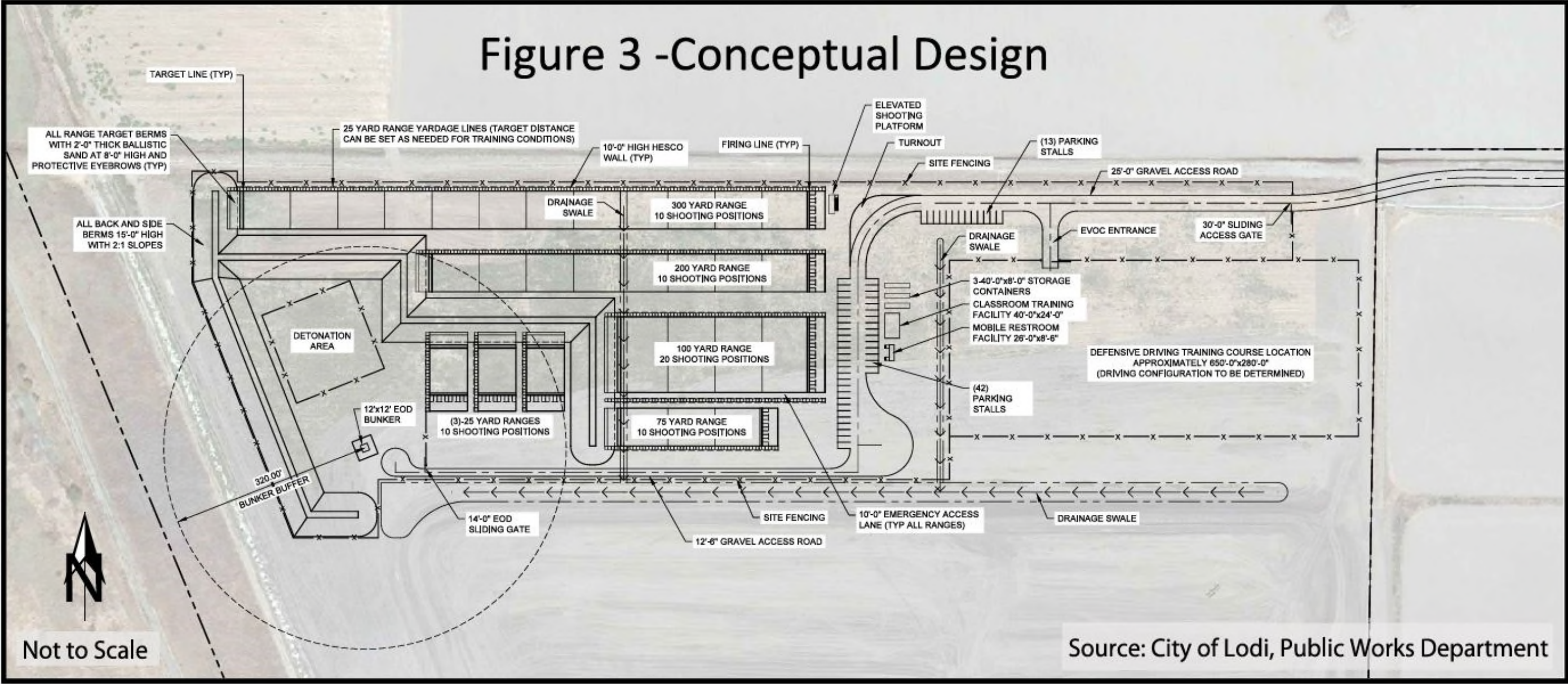


Figure 3 - Conceptual Design

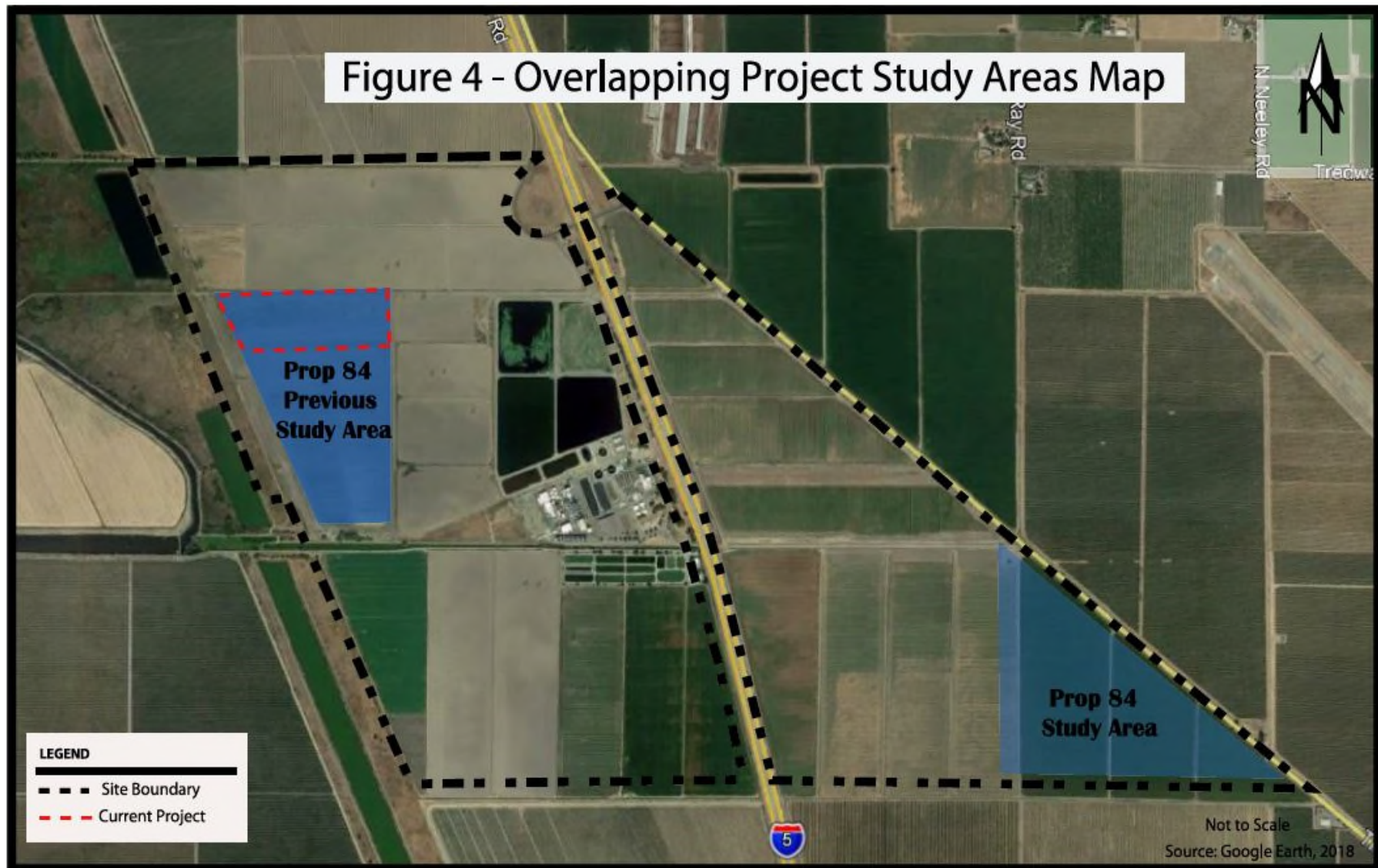


Figure 4 – Proposition 84 Ponds and Proposed Lodi Police Department Training Facility Locations


10. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project as indicated by the checklist on the following pages.

Environmental Factors Potentially Affected		
<input type="checkbox"/> Aesthetics	<input checked="" type="checkbox"/> Agriculture and Forestry	<input checked="" type="checkbox"/> Air Quality
<input checked="" type="checkbox"/> Biological Resources	<input checked="" type="checkbox"/> Cultural Resources	<input checked="" type="checkbox"/> Energy
<input type="checkbox"/> Geology/Soils	<input checked="" type="checkbox"/> Greenhouse Gas Emissions	<input checked="" type="checkbox"/> Hazards & Hazardous Materials
<input type="checkbox"/> Hydrology / Water Quality	<input type="checkbox"/> Land Use / Planning	<input type="checkbox"/> Mineral Resources
<input checked="" type="checkbox"/> Noise	<input type="checkbox"/> Population / Housing	<input type="checkbox"/> Public Services
<input type="checkbox"/> Recreation	<input type="checkbox"/> Transportation	<input checked="" type="checkbox"/> Tribal Cultural Resources
<input type="checkbox"/> Utilities / Service Systems	<input type="checkbox"/> Wildfire	<input type="checkbox"/> Mandatory Findings of Significance

11. ENVIRONMENTAL DETERMINATION

- ☐ I find that the proposed project could not have a significant effect on the environment, and a Negative Declaration will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A Mitigated Negative Declaration will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an Environmental Impact Report is required.
- ☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measure based on the earlier analysis as described on attached sheets. An Environmental Impact Report is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or Negative Declaration pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or Negative Declaration, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.


Paul Junker, Contract City Planner

2/13/2020
Date

12. ENVIRONMENTAL CHECKLIST

I. Aesthetics

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<i>Would the Project:</i>				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. In non-urbanized area, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The view of the area surrounding the WPCF is one of agricultural fields, wastewater treatment storage ponds, and the Northern California Power Agency power generating facility; the surrounding area consists of scattered agricultural and residential buildings. The visual character is rural, with Interstate 5 running north to south, adjacent to the Project site. The WPCF is viewed mainly by motorists traveling south on Interstate 5. As motorists near the facility, the four existing storage ponds and facility structures are visible. A buffer of eucalyptus and conifer trees and grass partially obscures the view of the facility as motorists pass.

- a) **No Impact.** The San Joaquin County General Plan does not identify any scenic vistas within the Project area.
- b) **No Impact.** No State “designated scenic highways” or “eligible scenic highways” are located within the vicinity of the project site (California Scenic Highway Program). There are no rock outcroppings, or historic buildings located on the project site. The San Joaquin County General Plan does identify Interstate 5, running north-south adjacent to the Project site, as a Scenic Route of agricultural/rural value. However, the Project site is part of the existing WPCF.
- c) **Less Than Significant Impact.** There is no “publicly accessible vantage point” within the range of the proposed project. The Project would not degrade the overall visual character of the site, since the site area has industrial facilities already in place.
- d) **Less Than Significant Impact.** Nighttime lighting for the 24-hour operation of the facility is currently present on the site for the operation of both the White Slough Water Pollution Control Facility and the Northern California Power Agency. It is anticipated that some

training will occur during evening hours, therefore, the site will require sufficient lighting to illuminate the firing line and the target areas, as well as walkways, parking areas, and the surrounding structures. The lighting at the proposed training facility will be focused onto the site, with appropriate incorporation of light shielding. Due to the level of 24-hour lighting already on site, and the incorporation of light shielding to keep light focused on the site, this is considered a less than significant impact.

II. Agricultural Resources

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p><i>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the Project:</i></p>				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program in the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of forest land (as defined in PRC Sec. 4526), or timberland zoned Timberland Production (as defined in PRC Sec. 51104 (g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Land use surrounding the White Slough WPCF Project area generally consists of agricultural land zoned as General Agriculture in the San Joaquin County General Plan. Residences in the area are associated with agricultural land use. Interstate 5 is located adjacent to the Project site. The Project site consists of the WPCF and surrounding City-owned agricultural land, consisting of corn crops or alfalfa/fodder grass.

The City of Lodi is a signatory to San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP). The land use area for the proposed project was previously agricultural land that was converted to facilitate the construction of the wastewater expansion ponds located to the adjacent south. The required compliance with SJMSCP for conversion of Agricultural Habitat Land, along with associated fees, was previously mitigated (2018). The SJMSCP response confirming the project is a Previously Mitigated Agricultural Land Habitat is available in **Appendix C**.

- a) Less than Significant Impact with Mitigation Incorporated. According to the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP), the proposed project activities are within an area previously mitigated (2018) due to the loss of agricultural land related to the Expansion Pond project which converted approximately 88 acres from Open Space Agricultural Habitat Lands to Urban Use. The City submitted the SJMSCP

Review Form dated December 8, 2016 and previously worked with SJCOG to comply with mitigation to address loss of Open Space Agricultural Lands. Previous conversion of the Agricultural Lands (Prop 84 Ponds Project) required compensation ratio of one acre of preserve acquired, enhanced, and managed in perpetuity for each acre of agricultural land converted from open space use, along with associated fees. The SJMSCP notice of previously mitigated agricultural habitat land is included in Appendix C.

- b) **No Impact.** The City of Lodi General Plan designates the WPCF as “Industrial” and the surrounding City-owned agricultural fields where the expansion pond is proposed as “Public/Quasi-Public”. The Project does not propose to convert any land zoned for agricultural use to non-agricultural use. According to the San Joaquin County Williamson Act FY 2013/2014 map, the WPCF is “Urban and Built-Up Land”. The former agricultural fields where the proposed project is planned mapped as “Non-Enrolled Land”, meaning the land is not enrolled in a Williamson Act, therefore this is no impact.
- c-d) **No Impact.** The Project site consists of the WPCF and surrounding City-owned agricultural land zoned as “Public/Quasi-Public”. The Project area is not comprised of any timber or forested properties.
- e) **Less than Significant Impact with Mitigation Incorporated.** The Police Training Facility is proposed within City-owned former agricultural fields that were converted to facilitate the construction of the expansion ponds in 2018. The proposed pond converted existing agricultural land, either corn crops or alfalfa/fodder grass, to non-agricultural land. According to the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP), the proposed projects activities are subject to SJMSCP, as the Expansion Pond converted 88 acres from Open Space Agricultural Habitat Lands to Urban Use. The City submitted the SJMSCP Review Form, dated December 8, 2016, and worked with the SJCOG to comply with mitigation to address the loss of Open Space Agricultural Lands which were associated with the pond project, and which already now cover the Proposed Police Training Facility Project. SJCOG provided an advisory notice, dated September 17, 2019, which states the Agricultural Habitat Land for the proposed project has been Previously Mitigated (2018). The SJMSCP response is available for review in Appendix C.

III. Air Quality

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

The proposed Project site is located west of the City of Lodi in San Joaquin County, which is within the jurisdictional boundaries of the San Joaquin Valley Air Pollution Control District (SJVAPCD). The San Joaquin Valley's relatively flat topography surrounded by elevated terrain and its meteorology provide ideal conditions for trapping air pollution and producing harmful levels of air pollutants, such as ozone and particulate matter. Elevated temperatures, cloudless days, low precipitation levels, and light winds during the summer in the Valley are favorable to high ozone levels. Inversion layers in the atmosphere during the winter months can also trap emissions of directly emitted PM_{2.5} (particulate matter that is 2.5 microns or less in diameter) and PM_{2.5} precursors (such as NO_x and sulfur dioxide (SO₂)) within the Valley for several days, accumulating to unhealthy levels.

The proposed Project is still in design draft phase; therefore, construction and operation dates are estimates. It should be noted that the proposed Project location has undergone ground disturbance (devegetation and grading) for the previous Prop 84 Ponds. For modeling purposed, the construction start date is estimated to begin by July 2020 and take approximately 6 months.

- a) **Less Than Significant Impact.** The proposed Project site is located within the jurisdictional boundaries of the SJVAPCD. At the federal level, the jurisdictional area of the SJVAPCD is designated as extreme nonattainment for the 8-hour ozone standard, nonattainment for PM_{2.5}, and attainment for the 1-Hour ozone, PM₁₀ and CO standards. At the State level, the area is designated as severe nonattainment for the 8-hour ozone, PM₁₀ and PM_{2.5} California Ambient Air Quality Standards CAAQS. Due to the nonattainment designations, the SJVAPCD has developed plans to attain the State and federal standards for ozone and particulate matter. The plans include the *2013 Plan for the Revoked 1-Hour Ozone Standard*, the *2007 Ozone Plan*, the *2007 PM₁₀ Maintenance Plan and Request for Redesignation*, the *2008 PM_{2.5} Plan*, and the *2012 PM_{2.5} Plan*.

The SJVAPCD's recommended thresholds of significant impact are a major component of the SJVAPCD's air quality plans. According to the SJVAPCD, projects with emissions should be compared to the thresholds of significance for criteria pollutants in order to

determine potential conflict with or obstruction of the applicable air quality plan. As detailed further below in section b, the proposed Project would produce temporary emissions of criteria pollutants that will not surpass the applicable thresholds of significance listed in **Table A-1**. Estimated air emissions are considered in Tables A-2 and A-3 below and demonstrate levels which are less than significant. Therefore, the proposed Project would not be considered in conflict with or obstruct implementation of the applicable air quality plan.

Table A-1. SJVAPCD Thresholds of Significance

Pollutant	Construction Emissions (tons/yr)	Operational Emissions (tons/yr)
ROG	10	10
NO _x	10	10
CO	100	100
SO _x	27	27
PM ₁₀	15	15
PM _{2.5}	15	15
<i>Source: SJVAPCD, March 2015.</i>		

- b) **Less Than Significant Impact with Mitigation Incorporated.** The proposed Project site is located within the jurisdictional boundaries of the SJVAPCD. According to SJVAPCD, the procedure for assessing construction and operation emission impacts should be analyzed using the newer CalEEMod 2016.3.2 impact calculator. The model applies default values for land uses. It should be noted however, that there is not currently a land use default category for a firing range in the model; therefore, light industrial land use input was applied in CalEEMod with project assumptions input where appropriate (such as estimated trips per day for Operation Emissions). A CalEEMod analysis was conducted by Petralogix Engineering, Inc (Petralogix, 2019) using the following project characteristics: Light Industrial Land Use, 1,100 square feet (modular buildings) and a total of 20 acres and Parking Lot with 55 spaces; Climate Zone 2, 2.7 m/s Wind Speed, 51 days Precipitation Frequency, and Statewide Average Utility Company. Where project-specific parameters are unknown, the default values in CalEEMod are used as they provide a conservative estimate of emissions.

Typically, construction and operation of a project generates emissions of various air pollutants, including criteria pollutants such as carbon monoxide (CO), ozone precursors such as nitrous oxides (NO_x), reactive organic gases (ROG) or Volatile Organic Compounds (VOC), particulate matter 10 (PM₁₀) and particulate matter 2.5 (PM_{2.5}), as well as sulfur oxides (SO_x). For example, typical emission sources during construction include equipment exhaust, dust from wind erosion, earth moving, excavation and other earthmoving activities, and vehicle movements.

To assist in evaluating impacts of project-specific air quality emissions, the SJVAPCD has adopted thresholds of significance for criteria pollutant emissions, expressed in units of tons per year (tons/yr), as presented in **Table A-1**.

ASSESSMENTS AND FINDINGS

Long Term Operational Emissions. Long-term operational impacts to air quality are greatly determined by land uses and vehicle travel associated with these uses. The amount of long-term emissions that generally result from a project such as a firing range is largely based on the number of new vehicle trips to the school site as a result of the project. In the case of the proposed Project, the users (primarily Lodi Police officers) currently travel outside of the Lodi area for critical training. Long-term operational impacts from emissions for the region would therefore be reduced by the decreased vehicle miles traveled. The California Emissions Estimator Model (CalEEMod) was used to estimate the projects long term operational emissions using the proposed 1,100 square feet of new construction for light industrial; although vehicle trips per day is estimated at 20, a conservative input of 40 trips per weekday was used in CalEEMod; the operational emissions estimates for the proposed project are considered a highly conservative result, since the Project will reduce the commuting mileage for Lodi Police officers and the daily trips anticipated were doubled in the model from 20 per day to 40 per day. Detailed CalEEMod results are shown in **Appendix D**, while a summary of the long-term operation project emissions is presented in the table below:

Table A-2. Estimated Operational Air Pollutant Emissions

Pollutant	SJVAPCD Significance Threshold (tons/yr)	Unmitigated Emissions		Mitigated Emissions	
		Total (tons/yr)	Total (lbs/day)	Total (tons/yr)	Total (lbs/day)
ROG	10	0.0207	0.1134	0.0207	0.1134
NO _x	10	0.1501	0.8225	0.1501	0.8225
CO	100	0.1571	0.8608	0.1571	0.8608
SO _x	27	0.00076	0.0042	0.00076	0.0042
PM ₁₀	15	0.0476	0.2608	0.0476	0.2608
PM _{2.5}	15	0.0133	0.0729	0.0133	0.0729
<i>Source: SJVAPCD, March 2015.</i>					

The proposed Project is still in the design draft stage, operations beginning in July 2020 was input as an estimate. The first full operational year for CalEEMod is 2021. All of the operational emissions (Table A-2) are well below the SJVAPCD Thresholds of Significance. Based on the results, we do not expect a cumulative significant impact for CO. A cumulative impact does not already exist in this region and both the unmitigated and mitigated CO emissions (Table A-2) would not result in localized CO concentration above the SJVAPCD thresholds. Additionally, CO is created by the combustion of fossil fuels by vehicles – this project is anticipated to decrease vehicle miles traveled regionally and the project is not intended to facilitate significant future growth. Operational emissions “mitigations” include using low bathroom fixtures. The operational period emissions for the project are all below the thresholds of significance and are considered less than significant with mitigation.

Project emissions would be short-term, (approximately 5-6 months), as a result of construction activities, as discussed below.

Short Term, Construction Phase Emissions. Short-term construction impacts to air include the emissions related to construction workers accessing the site, emissions from construction equipment, site preparation, and grading. It should be noted that devegetation and much of the grading was performed previously for the Prop 84 Ponds project and the buildings (one portable restroom and one 1,000 square-foot modular) will be hauled to the site. Construction days were extended to account for the additional development of firing range. Significant paving is not anticipated for the proposed Project. Soil is expected to remain on-site and will be incorporated into the project; no borrow will be imported and no spoils will be removed. Soil has been determined suitable as engineered fill and will be used as the fill source for berms (Terracon, 2019).

CalEEMod accounted for these construction project characteristics (Appendix D) during the analysis. Short-term emissions for this project are considered to be related to the construction phase of the project. The proposed Training Facility is currently in early draft design phase (15 to 25 percent), therefore, construction dates are approximate for modeling purposes. The construction phase of the project is estimated to begin July 2020 and continue through November or December 2020, or approximately 5 to 6 months. Of the many emissions generated during this type of construction, however, PM₁₀ is the pollutant of greatest concern. PM₁₀ emitted throughout the duration of a construction project can vary greatly, contingent on the level of activity, the specific operations, the equipment utilized, local soil, weather conditions and other factors, making quantification difficult. The SJVAPCD has adopted a set of PM₁₀ Fugitive Dust Rules, collectively called Regulation VIII. Several components of Regulation VIII specifically address fugitive dust generated by construction related activities. Detailed CalEEMod results are shown in Appendix D of this document, while a summary of the proposed Projects results for construction emissions are presented in the table below.

Table A-3. Estimated Construction Air Pollutant Emissions

Pollutant	SJVAPCD Significance Threshold (tons/yr)	Unmitigated Emissions		Mitigated Emissions	
		Total (tons/yr)	Total (lbs/day)	Total (tons/yr)	Total (lbs/day)
ROG	10	0.1499	2.4983	0.1499	2.4983
NO _x	10	1.5664	26.107	1.5664	26.107
CO	100	1.0622	17.703	1.0622	17.703
SO _x	27	0.00198	0.033	0.00198	0.033
PM ₁₀	15	0.3245	5.41	0.1914	3.19
PM _{2.5}	15	0.1826	3.043	0.1206	2.010
<i>Source: SJVAPCD, March 2015.</i>					

The mitigated and unmitigated emissions are all well below the SJVAPCD Thresholds of Significance (Table A-3). Based on the highest estimated emissions, evaluated per the SJVAPCD Thresholds of Significance, and the implementation of the following **Mitigation Measure Air 1**, which requires appropriate permitting with the SJVAPCD prior to

construction, **Mitigation Measure Air 2**, which incorporates Regulation VIII measures, the project Construction impacts to air quality will be **less than significant with mitigation**.

Air Quality Mitigation 1

The City of Lodi shall not begin construction activities until first securing appropriate permits from the San Joaquin Valley Air Control District.

Air Quality Mitigation 2: Construction of the proposed Project shall comply with all the applicable regulations specified in the San Joaquin Valley Air Pollution Control District Regulation VIII (Fugitive Dust Rules). The following procedures will be adhered to by the construction contractor(s) in accordance with Regulation VIII practices:

- Visible Dust Emissions (VDE) from construction, demolition, excavation or other earthmoving activities related to the Project shall be limited to 20% opacity or less, as defined in Rule 8011.
 - Pre-water all land clearing, grubbing, scraping, excavation, land leveling, grading, cut and fill, and phase earthmoving.
 - Apply water, chemical/organic stabilizer/suppressant, or vegetative ground cover to all disturbed areas, including unpaved roads.
 - Restrict vehicular access to the disturbance area during periods of inactivity.
 - Apply water or chemical/organic stabilizers/suppressants, construct wind barriers and/or cover exposed potentially dust-generating materials.
 - When materials are transported off-site, stabilize and cover all materials to be transported and maintain six inches of freeboard (i.e., minimum vertical distance between the top of the load and the top of the trailer) space from the top of the container.
 - Remove carryout and trackout of soil materials on a daily basis unless it extends more than 50 feet from site; carryout and trackout extending more than 50 feet from the site shall be removed immediately. The use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions. Use of blower devices is expressly forbidden. If the Project would involve more than 150 construction vehicle trips per day onto the public street, additional restrictions specified in Section 5.8 of Rule 8041 shall apply.
 - Traffic speeds on unpaved roads shall be limited to 15 mph.
-
- During construction, all earth moving activities shall cease during periods of high winds (i.e., greater than 30 mph). To assure compliance with this measure, grading activities are subject to periodic inspections by the City of Lodi staff.
 - Construction equipment shall be kept in proper operating condition, including proper engine tuning and exhaust control systems.
 - Areas following clearing, grubbing and/or grading shall receive appropriate BMP treatments (e.g., re-vegetation, mulching, covering with tarps, etc.) to prevent fugitive dust generation.

- All exposed soil or material stockpiles that will not be used within 3 days shall be enclosed, covered, or watered twice daily, or shall be stabilized with approved nontoxic chemical soil binders at a rate to be determined by the on-site construction supervisor.
- Unpaved access roads shall be stabilized via frequent watering, non-toxic chemical stabilization, temporary paving, or equivalent measures at a rate to be determined by the on-site construction supervisor.
- Trucks transporting materials to and from the site shall allow for at least two feet of freeboard. Alternatively, trucks transporting materials shall be covered.
- Where visible soil material is tracked onto adjacent public paved roads, the paved roads shall be swept, and debris shall be returned to the construction site or transported off site for disposal.
- Wheel washers, dirt knock-off grates/mats, or equivalent measures shall be installed within the construction site where vehicles exit unpaved roads onto paved roads.
- Diesel powered construction equipment shall be maintained in accordance with manufacturer's requirements and shall be retrofitted with diesel particulate filters where available and practicable.
- Heavy duty diesel trucks and gasoline powered equipment shall be turned off if idling is anticipated to last for more than 5 minutes.
- Where feasible, the construction contractor shall use alternatively fueled construction equipment, such as electric or natural gas-powered equipment or biofuel.
- Heavy construction equipment shall use low NOx diesel fuel to the extent that it is readily available at the time of construction.
- The construction contractor shall maintain signage along the construction perimeter with the name and telephone number of the individual in charge of implementing the construction emissions mitigation plan, and with the telephone number of the SJVAPCD's complaint line. The contractor's representative shall maintain a log of any public complaints and corrective actions taken to resolve complaints.
- During grading and site preparation activities, exposed soil areas shall be stabilized via frequent watering, non-toxic chemical stabilization, or equivalent measures at a rate to be determined by the on-site construction supervisor.
- During windy days when fugitive dust can be observed leaving the construction site, additional applications of water shall be required at a rate to be determined by the onsite construction supervisor.

c) **Less Than Significant Impact with Mitigation Incorporated.** Sensitive receptors are a category of land use that serves a population considered more sensitive to pollutant concentrations. Sensitive receptors include, but are not limited to, facilities such as hospitals, schools, convalescent homes, and residential areas. The potential for negative air quality impact on sensitive receptors increases as the distance between the sensitive receptors and source of emissions decreases. As stated in the Project location description, the project area is located in an agriculturally zoned land use area and thus not located near any sensitive receptors.

With the exception of a short period of time associated with the construction phase, implementation of the proposed Project would not result in any substantial increase in traffic on local area roadways. Therefore, the proposed Project's impact associated with mobile-source concentrations of CO are considered less than significant.

Another category of environmental concern is Toxic Air Contaminants (TACs). According to the California Air Resources Board (CARB), diesel exhaust particulate matter (DPM) is a TAC associated with diesel exhaust. DPM is identified as the most common TAC source for this type of project, which will utilize heavy diesel fueled equipment intermittently for the duration of the construction phase, estimated to last almost seven months. Health risks from TACs are a function of both the duration of exposure and the concentration of emissions. Due to the lack of proximity to sensitive receptors, the short duration of the construction phase utilizing diesel fueled equipment, as well as **Air Quality Mitigation 2** requiring diesel powered equipment be retrofitted with diesel particulate filters where available, the Project's impact of TACs is considered less than significant.

The Project site is located near a substantial source of TACs, the Interstate 5 freeway; however, there are no sensitive receptors located at the site. In addition, the Proposed Project would not introduce new sensitive receptors to the area. Therefore, the proposed Project would not be affected by any existing sources of TACs.

As discussed above, the proposed Project would not cause substantial pollutant concentrations, including TACs or localized CO. Therefore, impacts related to exposure of sensitive receptors to substantial pollutant concentrations would be less than significant.

- d) **Less Than Significant Impact.** Due to the subjective nature of odor impacts, the number of variables that can influence the potential for an odor impact, and the variety of odor sources, quantitative or formulaic methodologies to determine the presence of a significant odor impact do not exist. The intensity of an odor source's operations and its proximity to sensitive receptors influence the potential significance of odor emissions. Common types of facilities that have been known to produce odors in the San Joaquin Valley include, but are not limited to, wastewater treatment facilities, landfills, composting facilities, petroleum refineries, food processing facilities, feed lots, and/or dairies.

The proposed Police Training Facility would not produce objectionable odors. In addition, as discussed above, the site is located in a primarily agricultural regions with the nearest sensitive receptors just under approximately 1 mile.

Diesel fumes from construction equipment are often found to be objectionable; however, as discussed in further detail above, construction is temporary and associated diesel emissions would be regulated. As such, substantial levels of DPM associated with the temporary, intermittent construction activities would not be expected at the nearest sensitive receptor. Thus, odors related to DPM from construction equipment would not be expected to be considerable or affect a substantial number of people.

For the aforementioned reasons, construction and operation of the proposed Project would not create objectionable odors, and a less-than-significant impact related to objectionable odors would result.

IV. Greenhouse Gas Emissions

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<i>Would the Project:</i>				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Climate change is a global problem. Pollutants with localized air quality effects have generally short atmospheric lifetimes (approximately 1 day), greenhouse gas (GHG) emissions persist in the atmosphere for long enough periods of time (1 year to several thousand years) to be dispersed around the globe. The amount of GHGs required to ultimately result in climate change is not precisely known. What is known is that the amount is enormous, and no single project would measurably contribute to noticeable incremental change in the average global temperature. Thus, from the standpoint of CEQA, GHG impacts to global climate change are inherently cumulative.

Prominent GHGs of primary concern from land use development projects include carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O). There are other GHGs, such as chlorofluorocarbons, hydrofluorocarbons, and sulfur hexafluoride, however, these are less of a concern since construction and operational activities associated with land use development projects are not likely to generate these in substantial quantities. To quantify GHG, a standard of "CO₂-Equivalent" or CO₂E is used. Carbon dioxide equivalency (CO₂E) refers to the amount of mixed GHGs that would have the same global warming potential when measured over a specified timescale (generally 100 years).

California has adopted a wide variety of regulations aimed at reducing the State's greenhouse gas (GHG) emissions. These regulations include, but are not limited, to the following:

- **Assembly Bill (AB) 32.** The California Global Warming Solutions Act of 2006, requires California to reduce statewide GHG emissions to 1990 levels by 2020. AB 32 directs ARB to develop and implement regulations that reduce statewide GHG emissions.
- **Executive Order S-3-05.** This order establishes GHG emission reduction targets for California and directs the CAL-EPA to coordinate oversight efforts. The targets, which were established by Governor Schwarzenegger, call for a reduction of GHG emissions to 2000 levels by 2010; a reduction of GHG emissions to 1990 levels by 2020; and a reduction of GHG emissions to 80% below 1990 levels by 2050.
- **Senate Bill 375.** Senate Bill (SB) 375 was enacted in order to align regional transportation planning efforts, regional GHG reduction targets, and land use and house allocation. SB 75 requires Metropolitan Planning Organizations (MPOs) to adopt a Sustainable Communities Strategy (SCS) or Alternative Planning Strategy (APS), which will prescribe land use allocation in the MPOs Regional Transportation Plan.

- **Executive Order B-30-15.** This order requires that greenhouse gas emissions in California are reduced by 40 percent below 1990 levels by 2030, and below 1990 levels by 2050.

The San Joaquin Valley Air Pollution Control District has adopted **Rule 9510 – Indirect Source Review (ISR)** in order to:

- Fulfill the District's emission reduction from nitrogen oxide (NOx) and particulate matter of 10 microns or less (PM10) that are associated with construction and operation of a new development project;
- To achieve emission reductions from the construction and use of development projects through design features and on-site measures; and
- To provide a mechanism for reducing emissions from the construction of and use of development projects through off-site measures.

The emissions are called indirect since they don't come directly from a "smokestack" like traditional industry emissions, but instead from growth in population. According to the SJVAPCD, mobile source emissions make up over 85 percent of the Valley's NOx emissions, the primary driver in the formation of particulate matter and ozone pollution. As the District notes, in general, new development contributes to the air pollution problem by increasing the number of vehicles and the amount of vehicle miles traveled. As stated in the SJVAPCD *Frequently Asked Questions: Rule 9510 Indirect Source Review (ISR)* (2018), although the District has no regulatory authority to control tailpipe emissions from motor vehicles, the District undertook groundbreaking action to reduce vehicle miles traveled by adopting Rule 9510 Indirect Source Review".

Rule 9510 – Indirect Source Review applies to any applicant that seeks to gain a final discretionary approval for a development project, or any portion thereof, which upon full build-out will include any of the following:

- 50 residential units;
- 2,000 square feet of commercial space;
- 25,000 square feet of light industrial space;
- 100,000 square feet of heavy industrial space;
- 20,000 square feet of medical office space;
- 39,000 square feet of general office space;
- 9,000 square feet of educational space;
- 10,000 square feet of government space;
- 20,000 square feet of recreational space; or
- 9,000 square feet of space not identified above.

a) **Less Than Significant Impact.** The CalEEMod model estimated the construction and operational emissions anticipated for the proposed Project (see Appendix D). Based on the CalEEMod results, the proposed Project construction GHG emissions will generate approximately 175.5826 metric tons per year of CO₂ equivalent with a slight reduction to 175.5824 CO₂ equivalent with the application of **Air Quality Mitigation Measure 2**. (Carbon dioxide equivalent, or CO₂E, is a term that is used for describing different greenhouse gases in a common and collective unit). Neither the SJVAPCD or the State has established a threshold of significance for GHG emissions from construction activities, however, the

construction emissions will be short-term (approximately 5 to 6 months) and cease once completed. Taking into account the site has already been cleared and graded for the previous Prop 84 Ponds and the CalEEMod emissions are likely very conservative, this is considered a less than significant impact.

The CO₂ equivalent for the project is 80.3058 MT/Year unmitigated and 80.1855 MT/Year mitigated. In terms of operational emissions, ARB staff allows small projects to be considered insignificant if a project consists of a quantitative threshold of 7,000 metric tons of carbon dioxide equivalent per year for operational emissions. The total CO₂E estimated for the proposed Project utilizing the CalEEMod model was considered with conservative inputs, including twice the estimated vehicle trips anticipated per day (40 vehicle trips estimated/input but 20 vehicle trips per day is considered more reasonable). This is well below the proposed threshold of significance of 7,000 MT/Year of CO₂E for operations proposed by ARB. In addition, it should be noted that the proposed Project would result in an overall reduction of regional vehicle miles traveled (VMT), given the Training Facility would be for Lodi PD who are currently traveling to training facilities out of the area. This is a less than significant impact.

According to San Joaquin Valley Air Pollution Control District (District), if a proposed Project exceeds 10,000 square feet of government space, the District concludes that the proposed Project would be subject to District Rule 9510 (Indirect Source Review). As the District notes, in general, new development contributes to the air pollution problem by increasing the number of vehicles and the amount of vehicle miles traveled; the District states that Rule 9510 ISR is in response to reduce vehicle miles traveled. It is worth noting then, that the need for the proposed Police Training Facility is in response to current police force members being required to travel regionally out of Lodi to access other shooting range facilities. Therefore, upon completion of the Training Facility, the project would result in an overall reduction of VMT. It is also relevant to note that the proposed Project only requires two small modular buildings (1,000 square-feet) and 55 unpaved parking stalls to facilitate the shooting range activities. The purpose of Rule 9510 ISR is to achieve emission reductions from the construction and use of development projects through design features and on-site measures; the project would reduce VMT once approved and the City has Air Quality Mitigation Measure 2 to reduce construction emissions with on-site measures. Although the District may consider Rule 9510 ISR applicable to the proposed Project due to its overall footprint of approximately 20 acres, the modular building footprints (1,100 square feet) is considered a more reasonable assessment given the nature of the proposed Project discussed above. The NO_x and PM₁₀ emissions, even with conservative inputs into the approved CalEEMod model, as shown below, are less than significant.

Table G-1. Nitrogen Oxide and Particulate Matter of 10 Microns

Pollutant	SJVAPCD Significance Threshold (tons/yr)	Construction Emissions		Operational Emissions	
		Unmitigated Total (tons/yr)	Mitigated Total (tons/yr)	Unmitigated Total (tons/yr)	Mitigated Total (tons/yr)
NO _x	2	1.5664	1.5664	0.1501	0.1501
PM ₁₀	2	0.3245	0.1914	0.0476	0.0476

Source: SJVAPCD, Rule 9510.

b) **Less Than Significant Impact.** ARB staff allows small projects to be considered insignificant if a project consists of a quantitative threshold of 7,000 metric tons of CO₂ equivalent per year for operational emissions. As discussed above, the CO₂ equivalent for the project operation emissions is 80.3058 MT/Year unmitigated and 80.1855 MT/Year mitigated. According to San Joaquin Valley Air Pollution Control District (District), if a proposed Project exceeds 10,000 square feet of governmental space, the district concludes that the proposed Project would be subject to District Rule 9510 (Indirect Source Review). However, the proposed Project will in fact be *reducing* the vehicle miles traveled per day as Lodi Police are currently traveling regionally for training, plus the buildings planned for the project are two small portables; therefore, Rule 9510 should be considered non-applicable to the project. The project would be subject to all applicable permit and planning requirements in place or adopted by the District, San Joaquin County, and the City of Lodi. No significant conflict with GHG reduction policies is anticipated, therefore, there is a **less than significant impact**.

V. Biological Resources

Issues	Potentially Significant Impact	Potentially Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<i>Would the proposal:</i>				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Moore Biological Consultants prepared a biological assessment (Moore Biological Consultants, 2016) of the previously discussed Prop 84 Pond project sites and how the project could affect the environment within and adjacent to the sites (including the proposed Police Training Facility location) and a Biological Assessment – Lodi Police Training Facility Project (Moore Biological Consultants, 2019). Their reports include biological information regarding Waters of the U.S. and wetlands, Federal and State special-status species, and other natural resources in the project site, in accordance with the Federal Endangered Species Act (FESA), the Clean Water Act (CWA), the Rivers and Harbors Act, the Migratory Bird Species Act (MBTA), the California Endangered Species Act (CESA), the California Environmental Quality Act (CEQA), the Fish and Game Code of California, the Porter-Cologne Water Quality Control Act, the California Native Plant Protection Act, and the San Joaquin County Multispecies Habitat Conservation and Open Space Plan (SJMSCP). The results of their assessment are hereby incorporated by reference (Moore Biological Consultants, 2016 and 2019), with an emphasis on the recent Lodi Police Training Facility Project Biological Assessment (available in Appendix E).

Moore Biological Consultants utilized the California National Diversity Database (CNDDDB) to identify wildlife and plant species that have been previously documented in the project vicinity or that have the potential to occur based on suitable habitat and geographical distribution. They also conducted field surveys of the proposed project site, which included an assessment of potentially jurisdictional waters of the U.S., special-status species, and suitable habitat for special-status species.

- a) **Less than Significant With Mitigation Impact.** Special-status species are plants and animals that are legally protected under the CESA, FESA, or other regulations. Special-status species also include other species that are considered rare enough by the scientific community and trustee agencies to warrant special consideration, particularly with regard to protection of isolated populations, nesting or denning locations, communal roosts, and other essential habitat (Moore Biological Consultants, 2016).

The Federal Endangered Species Act (FESA) of 1973 (16 U.S.C. 1531-1543) and subsequent amendments provide guidance for the conservation of endangered and threatened species and the ecosystems upon which they depend. Section 7 of FESA requires Federal agencies to ensure that the actions they authorize, fund, or carry out are not likely to jeopardize the continued existence of threatened or endangered species or result in the destruction or adverse modification of critical habitat for these species. The California Endangered Species Act (CESA) (Fish and Game Code 2050 et seq.) establishes the policy of the State to conserve, protect, restore, and enhance threatened or endangered species and their habitats. CESA mandates that State agencies should not approve projects that would jeopardize the continued existence of threatened or endangered species, if reasonable and prudent alternatives are available that would avoid jeopardy. The CDFW is required to issue a written finding indicating if a project would jeopardize threatened or endangered species and specifying reasonable and prudent alternatives that would avoid jeopardy.

The California Native Plant Protection Act (codified in Fish and Game Code Sections 1900-1913) is intended to preserve, protect, and enhance endangered or rare native plants in the state. A species is endangered when its prospects for survival and reproduction are in immediate jeopardy from one or more causes. A species is rare when, although not threatened with immediate extinction, it is in such small numbers throughout its range that it may become endangered if its present environment worsens.

CEQA Guidelines Section 15380 provides that a species not listed under the FESA or CESA may be considered rare or endangered under specific criteria. These criteria have been modeled after the definitions in FESA and CESA.

Farming, development, construction and maintenance of roads and utilities, and operation of the WPCF have substantially modified natural habitats within the greater project vicinity. The intensely cultivated field and strip of ruderal grasslands in the proposed Project site are highly disturbed, biologically unremarkable, and do not provide suitable habitat for special-status plants. Due to the lack of suitable habitat, no special-status plant species are expected to occur (Moore, 2019). The potential for intensive use of habitats within the project site is generally low; with the exception of Swainson's hawk, burrowing owl, white-tailed kite, and the tricolored blackbird, No special-status wildlife species are expected to occur in or near the site on more than a very occasional or transitory basis (Moore, 2019).

Per Moore Bio, although considered unlikely, Pacific pond turtle and giant garter snake could occasionally move onto the site and are given consideration.

As discussed above, the likelihood of occurrence of listed, candidate, and other special-status species in the project site is generally low. This determination is based on an assessment of the likelihood of occurrence of each of these species in and/or near the site. The evaluation of the potential for occurrence of each species is based on the distribution of regional occurrences (if any), habitat suitability, and field observations (Figures 5 and 6) (Moore Biological Consultants, 2019). The proposed Project also takes place within existing road rights-of-way and does not disturb any native or undisturbed areas.

Within the project site, intensively farmed fields provide foraging habitat for a variety of birds and seasonal habitat for a variety of migratory wildlife, primarily waterfowl. The existing wastewater treatment ponds just east of the intended site do not provide nesting habitat or a food source for birds but are often used for loafing. The well-developed riparian woodlands and wetlands of White Slough, Dredger Cut, and other Delta waterways adjacent to or near the WPCF support a more diverse assemblage of plant and wildlife species, including special-status species, though the potential for intensive use of habitats within the project site by special-status wildlife is generally low (Moore Biological Consultants, 2016).

Special status plant species recorded along the waterway in the greater project vicinity include Woolly rose mallow, Delta tule pea, Mason's lilaeopsis, Delta mudwort, Side-flowering skullcap, and Suisun marsh aster. However, the leveled fields, maintained irrigation ditches, and patches of highly disturbed ruderal upland grassland habitat within the WPCF do not provide suitable habitat for any special-status plants (Moore Biological Consultants, 2016).

Special status wildlife species with the potential to occur in the proposed project site on a more than transitory or very occasional basis include Swainson's hawk, Tri-colored blackbird, Burrowing owl, and Pacific pond turtle. Special consideration is also given to Giant garter snake. White-tailed kite and song sparrow are also considered to have a moderate potential for occurrence in the site. Generally, special-status mammals, reptiles, amphibians, and fish are all unlikely to occur within the project site itself, although surrounding riparian and aquatic areas provide habitats for these animals (Moore Biological Consultants, 2016 and 2019).

Swainson's hawk:

Swainson's hawk is a migratory hawk listed by the State of California as a Threatened species. The CNDDDB (2019) contains several records of nesting Swainson's hawk in the greater project vicinity. A pair of Swainson's hawks was observed nesting a lone cottonwood tree approximately 0.40 miles south of the site, just north of Dredger Cut during the June 24, 2019 field survey performed by Moore Biological Consultants, and adult Swainson's hawks were observed perched in the tree a few feet above the nest, which contained at least one chick. It has been observed that Swainson's hawks used this same nest in 2018, with two chicks successfully fledging. Although the proposed Project is located in an area known to provide habitat for numerous Swainson's hawks, there are no trees within or immediately adjacent to the site that could be used by nesting Swainson's hawks.

The project will participate in the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (HCP) (SJCOG, 2000) – and as such, Standard Incidental Take

Minimization Measures (ITMMs) under HCP outline protective measures for Swainson's hawk. The proposed Project is currently in the conceptual design phase; in the event that construction commences during the nesting season (i.e., if construction starts between March 1 and August 31) and Swainson's hawks are nesting in or adjacent to the site, a construction setback from the nest tree would be required until nesting is complete. The setback is calculated as twice the diameter of the dripline of the nest tree as measured from under the nest and is generally less than 100 feet. With the incorporation of Biological Resources Mitigation Measure 1, which indicated the Project shall participate in the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (Biological Resources Mitigation Measure 1) and preconstruction clearance survey requirement for special-status species (Biological Resources Mitigation Measure 2) will reduce impact to Swainson's hawk to **less than significant with mitigation**.

Biological Resources Mitigation Measure 1

The Project shall participate in the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan. The Project shall coordinate with San Joaquin Council of Governments (555 E. Weber Avenue, Stockton, CA 95202), prior to any site disturbance activities. The project site was addressed in the previous Proposition 84 Ponds project and biological impacts associated with development of the project site have been mitigated through the SJMSCP. Standard Incidental Take Minimization Measures (ITMMs) of the SJMSCP will apply to the project.

Biological Resources Mitigation Measure 2 - Preconstruction Survey Requirement

A qualified biologist shall conduct a preconstruction clearance survey for special-status species and migratory birds in all potential habitats throughout the project area; thus, any action that disrupts surface soils (e.g., clearing and grubbing, rough grading, excavation, compaction for temporary staging areas or permanent construction sites) shall be subject to a preconstruction survey. Surveys shall be undertaken not more than 30 days prior to ground disturbing activity to ensure avoidance during construction. All areas within 250 feet of the project area shall be surveyed where site access and visibility allow. If no special-status species or migratory birds are present, further mitigation is not necessary. If any special-status species and/or migratory birds are found nesting on-site, the biologist shall implement protective measures to ensure that animals are not adversely affected, and construction does not commence until the biologist has determined no harm would result to breeding animals as a result of construction. Written results of the preconstruction survey shall be submitted to the City of Lodi and San Joaquin County Council of Governments Habitat Conservation Program.

Tricolored blackbird:

Tricolored blackbird, a species endemic to California, is a State of California Species of Concern and is protected by the federal Migratory Bird Treaty Act and Fish and Game Code of California. The site does not contain the expansive patches of tules, cattails, or other emergent wetland vegetation required for nesting, but White Slough, Dredger Cut, and the peripheral canal west of the WPCF provide suitable nesting habitat for the tricolored blackbird. Although the extent of foraging by tricolored blackbirds in this area is not known, the grassland areas in and adjacent to the project site may potentially be used by foraging by this species. Standard ITMMs under the HCP outline protective measures. Therefore, with Biological Resources Mitigation Measure 1 and Biological Resources Mitigation Measure 2, the impact will be **less than significant with mitigation**.

White-tailed kite:

White-tailed kite is a State of California Species of Concern but is not a listed species at the state or federal level. The Migratory Bird Treaty Act and Fish and Game Code protect white-tailed kite year-round, as well as their nests during nesting season; nesting season for this species peaks from May to August, concurrent with other resident Central valley raptors (Moore Biological Consultants, 2019). While there are no trees within or immediately adjacent to the proposed Project site that could be easily utilized by white-tailed kite, white-tailed kites likely forage in the site on occasion; a white-tailed kite was observed foraging in an adjacent field during one of the field surveys (Moore Biological Consultants, 2019). Standard ITMMs under the HCP outline protective measures. Therefore, with Biological Resources Mitigation Measure 1 and Biological Resources Mitigation Measure 2, the impact will be **less than significant with mitigation**.

Burrowing owls:

Burrowing owls are not listed under FESA or CESA, but the MBTA and Game Code of California protects them year-round and protects their nests and eggs during nesting season (February 1 through August 31). The primary requirement for the burrowing owl is small mammal burrows for nesting. The nearest record of nesting burrowing owls in the CNDDDB (2019 search area is approximately 4 miles southeast of the site. The intensity of development and agriculture within and surrounding the site reduces the likelihood of burrowing owls using the site for nesting. Careful inspection of all burrows in and adjacent to the site showed no evidence of burrowing owl occupancy and no burrowing owls were observed during the field surveys (Moore Biological Consultants, 2019). Standard ITMMs under the HCP outline protective measures such as if construction is scheduled to commence outside the nesting season (between September 1 and January 31) and burrowing owls are present on-site, they can be passively relocated; in the event that construction commences during the nesting season and burrowing owls are present on-site, a 250-foot construction setback from the natal burrow would be required until nesting is complete. Therefore, with Biological Resources Mitigation Measure 1 and Biological Resources Mitigation the impact will be **less than significant with mitigation**.

Pacific pond turtle:

The Pacific pond turtle is a state species of concern but is not a listed species at the state or federal level. The nearest documented occurrence of this species in the CNDDDB (2019) is reportedly 0.25 miles north of the project site. Moore Biological Consultants (2019) note the project site and intensely cultivated fields surrounding the site provide very poor-quality nesting habitat for this species, which prefers sandy substrates for nesting. Pursuant to the HCP, aquatic habitats such as the sloughs to the west of the site are considered “potential habitat” for Pacific pond turtle, triggering an automatic “no construction” buffer extending 300 feet from the centerline of the aquatic habitats, unless a buffer reduction is granted by SJCOG. In January 2017, the City of Lodi secured a buffer reduction for the Prop 84 Pond project (adjacent south of proposed Project site) from 300 feet to 0 feet; securing a similar setback from SJCOG is recommended for the proposed Project (Moore Biological Consultants, 2019). Standard ITMMs related to preconstruction surveys for western pond turtle will still be required, and temporary construction setbacks from nests will be implemented in the event active nests are located. With Biological Resources Mitigation Measure 1 and Biological Resources Mitigation the impact will be **less than significant with mitigation**.

Giant garter snake:

The giant garter snake is listed as threatened both under FESA and CESA. Critical habitat has not been designated for this species. Necessary habitat components of giant garter snake consist of: (1) adequate water during the snake's active season (early-spring through mid-fall) to provide food and cover; (2) emergent, herbaceous wetland vegetation, such as cattails and bulrushes, for escape cover and foraging habitat during the active season; (3) grassy banks and openings in waterside vegetation for basking; and (4) higher elevation uplands for cover and refuge from flood waters during the snake's dormant season in the winter; giant garter snakes inhabit small mammal burrows and other soil crevices for aestivation. Moore Biological Consultants notes the project site does not provide the aquatic habitat required by giant garter snakes due to its intermittent nature plus the grasslands and croplands in the site are highly disturbed. Neither of these upland habitat types provide high quality aestivation habitat for the giant garter snake and the nearest documented occurrence in the CNDDDB (2019) is approximately 5.5 miles northwest of the project site.

Pursuant to the HCP, aquatic habitats such as sloughs to the west of the site are considered "potential habitat" for giant garter snake, triggering an automatic "no construction" buffer extending 200 feet from the centerline of the aquatic habitats, unless a buffer reduction is granted by SJCOG. As noted above in regard to the pacific pond turtle, in January 2017, the City of Lodi secured a buffer reduction for the pond project adjacent south of the site from 200 feet to 0 feet. Securing a similar setback from SJCOG for giant garter snake is recommended for the proposed Project (Moore Biological Consultants, 2019). Standard ITMMs related to preconstruction surveys for giant garter snake will still be required. With Biological Resources Mitigation Measure 1 and Biological Resources Mitigation Measure 2 the impact will be **less than significant with mitigation**.

Implementation of the aforementioned mitigation measures would reduce the above-identified impacts to biological resources to a less-than-significant level.

- b) **Less Than Significant Impact.** The project site is a field that has been farmed in hay for decades and a narrow band of upland grassland. No potentially jurisdictional Waters of the U.S, riparian wetlands, or seasonal wetlands were observed within the footprint of the proposed project (Moore Biological Consultants, 2019). The Project will have no adverse impacts on sensitive or regulated habitat because the Project site itself is devoid of native riparian vegetation or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS. In addition, none of the irrigation channels identified bordering the Project site is vegetated with riparian shrubs or trees. However, White Slough and the natural delta areas west of the WPCF support a wide variety of riparian and woodland vegetation. Dredger cut is completely choked with water hyacinth, and White Slough, the Highland Canal, and other Delta waterways to the west of the WPCF have more open water and support a larger variety of emergent wetland vegetation within them and/or along their banks. Therefore, the project will have a less than significant impact.
- c) **Less Than Significant Impact.** Despite the San Joaquin River and other Delta waterways located west and southwest of the site, no waters or wetlands that fall under the jurisdiction of the U.S. Army Corps of Engineers (ACOE), California Regional Water Quality Control Board (RWQCB), and/or CDFW were observed in or immediately adjacent to the site (Moore, 2019). The San Joaquin River is a navigable Water of the U.S. subject to Section 404 of the Clean Water Act, as well as Section 10 of the River and Harbor Act. White

Slough, Dredger Cut, Highline Canal, Bishop Cut, and other Delta waterways west and southwest of the site are also Waters of the U.S., although some may not be considered navigable. The limit of federal jurisdiction on all of these waterways is high tide, which is a few feet above mean sea level. These waterways also fall under the jurisdiction of CDFW and the RWQCB.

The Clean Water Act (CWA) (33 U.S.C. 1251-1376) provides guidance for the restoration and maintenance of the chemical, physical, and biological integrity of the nation's waters. Jurisdictional wetlands and Waters of the U.S. include, but are not limited to, navigable waterways, their tributaries, and adjacent wetlands; perennial and intermittent creeks and drainages, lakes, seeps, and springs; emergent marshes; riparian wetlands; and seasonal wetlands. Section 404 of the CWA requires that a permit be secured prior to the discharge of dredged or fill materials into any waters of the U.S.; this permit program is administered by the U.S. Army Corps of Engineers (ACOE). Implementing regulations by ACOE are found at 33 CFR Parts 320- 330. Guidelines for implementation allow the discharge of dredged or fill material into the aquatic system only if there is no practicable alternative that would have less adverse impacts. Section 401 of the CWA requires an applicant for a Federal license or permit that allows activities resulting in a discharge to waters of the U.S. to obtain a state certification that the discharge complies with other provisions of the CWA. The Regional Water Quality Control Board (RWQCB) administers the certification program in California. Section 10 of the Rivers and Harbors Act requires permits in, above, or below navigable waters of the U.S. for all structures such as docks, bridges, riprap, and activities such as dredging. A CWA Section 404 permit process usually also covers Section 10 of the Rivers and Harbors Act, where appropriate. Projects that affect Waters of the State may also be required to meet waste discharge requirements (WDRs) of the RWQCBs. The Central Valley Regional Water Quality Board is expected to develop a program requiring WDRs for the fill of isolated wetlands that are not subject to CWA Section 404.

There is no work proposed in White Slough, Dredger Cut, or any other Delta waterways, and beyond the San Joaquin River and other Delta waterways west and southwest of the site, no other potentially jurisdictional wetlands or Waters of the U.S. were observed in or near the site (Moore Biological Consultants, 2019). Therefore, no significant impact would occur. The proposed Project site is within designated critical habitat for delta smelt but will not adversely impact delta smelt critical habitat (Moore Biological Consultants, 2019). Moore Biological Consultants notes that the project will not involve work in rivers or streams, and will not change regional drainage patterns, and thus it will have no effect on special-status fish.

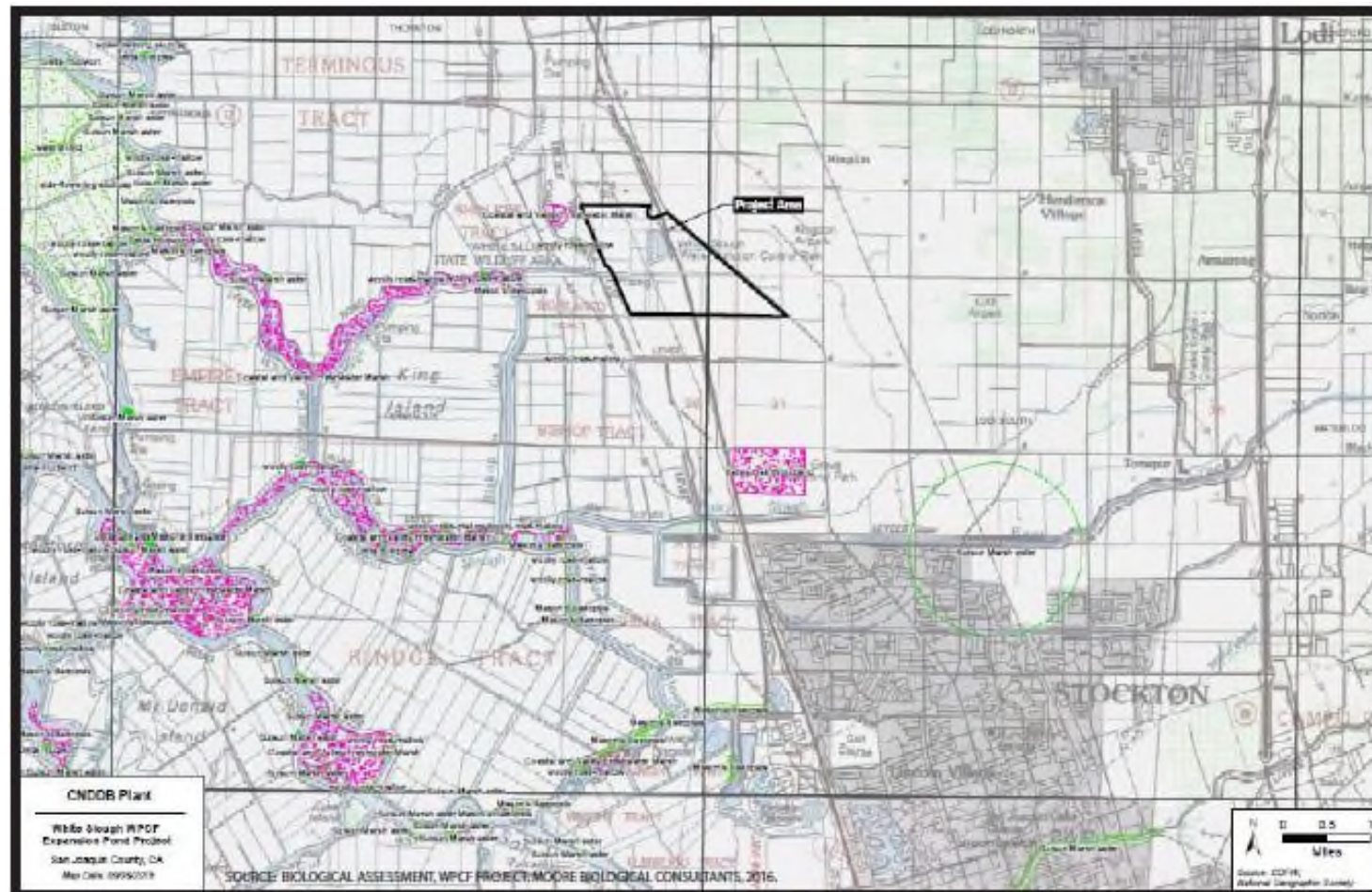
- d) **Less Than Significant Impact.** The Project site is surrounded by unobstructed movement habitat and is not located within a linkage area between important habitat areas or resources. Due to availability of movement routes throughout the Project vicinity and the relatively small project area, Project impacts to sensitive species movement routes would be less than significant under CEQA.
- e) **Less Than Significant Impact.** Construction and operation of the Project would not conflict with any local policies or ordinances protecting biological resources. The local authority for the Project area is detailed in the provisions of the San Joaquin County General Plan address the preservation of environmentally sensitive areas that have existing natural watercourses, drainage basins, sloughs, or other natural water features, including maintaining the quality of existing wetland areas. Other than conserving native oaks and

native trees associated with rivers, creeks, and streams, no specific tree preservation ordinances exist for the project area. Activities associated with the operation and maintenance of the proposed Project would have no impact on sensitive biological resources protected by local ordinances.

- f) **No Impact.** A significant impact may occur if the proposed Project were inconsistent with mapping or policies in any conservation plans of the types cited. In an effort to protect sensitive and threatened species throughout San Joaquin County, SJCOG prepared the San Joaquin County Multispecies Habitat Conservation and Open Space Plan (SJMSCP). The purpose of the SJMSCP is to provide for the long-term management of plant, fish and wildlife species, especially those that are currently listed or may be listed in the future under the FESA or CESA, and to provide and maintain multiple-use open space that contributes to the quality of life of residents of San Joaquin County.

The City of Lodi has adopted the SJMSCP and the Project's participation in the plan is required by the City. The plan should involve payment of fees and implementation of standard Take Avoidance measures outlined in the HCP for Swainson's Hawks, burrowing owls, Pacific pond turtles, and giant garter snakes. Pursuant to the HCP, aquatic habitats such as the sloughs to the west of the site are considered "potential habitat" for giant garter snake and Pacific pond turtle, thus triggering automatic "no construction" buffers extending 200 and 300 feet from the centerline of aquatic habitats, respectively unless a buffer reduction is granted by SJCOG. In January 2017, the City of Lodi secured buffer reductions for the Prop 84 Pond project adjacent south of the proposed project to "0 feet" for both species. The City will request the securing of similar setbacks from SJCOG for the proposed Project. Because the proposed Project will participate with the SJMSCP, there will be no impact.

Pursuant to the Final EIR/EIS for the SJMSCP, dated November 15, 2000, and certified by the San Joaquin Council of Governments on December 7, 2000, implementation of the SJMSCP is expected to reduce impacts to biological resources resulting from the proposed Project to a level of less-than-significant. That document is hereby incorporated by reference and is available for review during regular business hours at the San Joaquin Council of Governments (555 E. Weber Avenue, Stockton, CA 95202) or online at: www.sjcog.org. Thus, the proposed Project would comply with the SJMSCP, and no impact would occur.



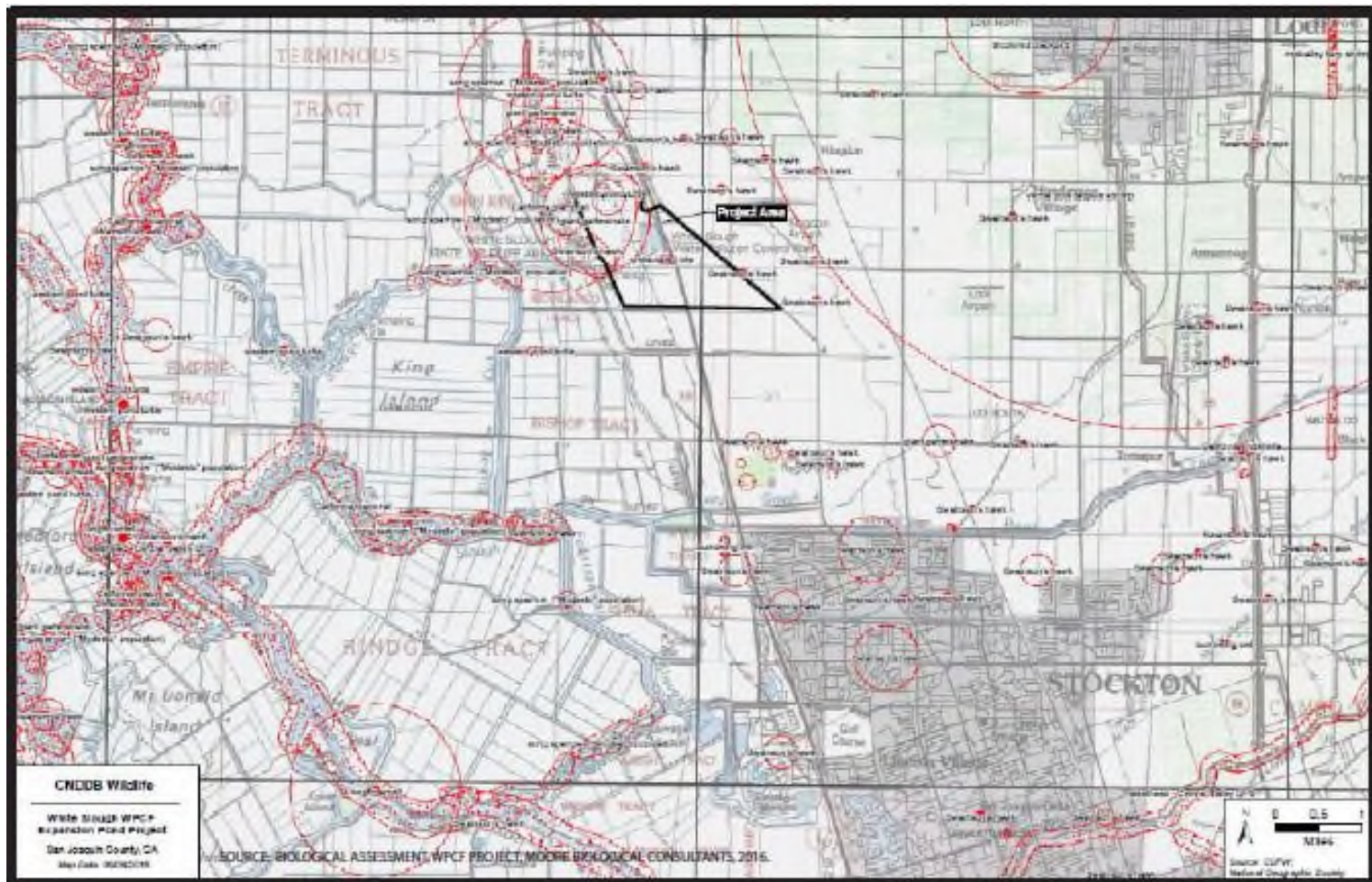


Figure 6 - Federal and State Special Status Wildlife Species Distribution Map

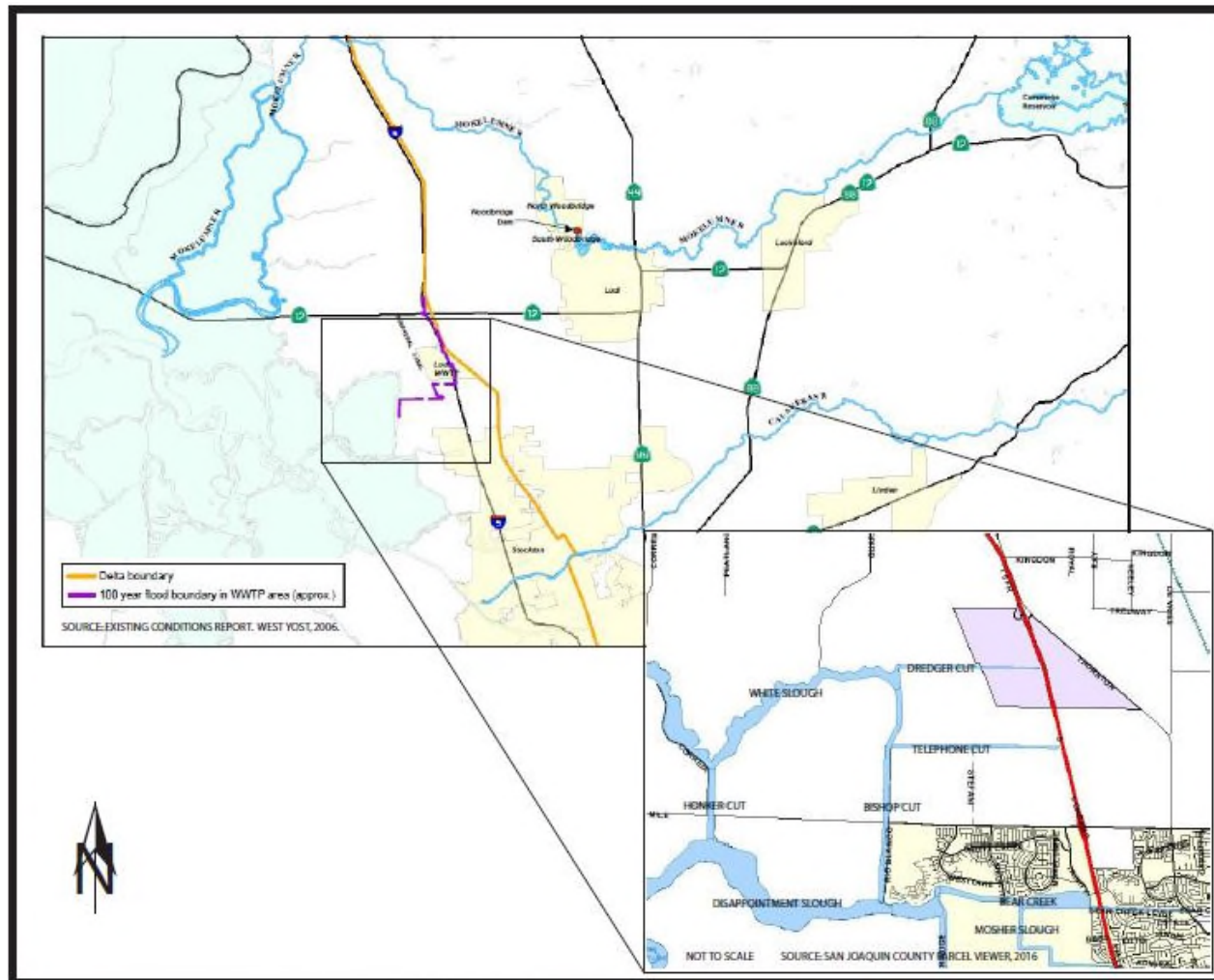


Figure 7 - Surface Waterways

VI. Cultural Resources

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<i>Would the Project:</i>				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	■	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	■	<input type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of formal cemeteries.	<input type="checkbox"/>	■	<input type="checkbox"/>	<input type="checkbox"/>

Michael Baker International (Michael Baker) completed a Cultural Resources Identification Report (November 2015) in support of the environmental review of the proposed Prop 84 Ponds Project under CEQA, adopted on March 15, 2017. The proposed Police Training Facility site is located within the previous study area (an approximately 135-acre area in the northwest portion of the facility); therefore, the Cultural Resources Identification Report is considered valid for the proposed project. The investigation included archival research, a field survey, and Native American and historical society consultation. Since the previous northwest potential pond location encompasses the proposed project location, any reference to the Project will hereby mean the northwest site, however, information regarding the southeast site is still included in this report. Due to confidentiality provisions, the Michael Baker report is not included as an appendix to this environmental document. The report findings are summarized below.

- a) **Less than Significant.** As summarized in the below table, the Cultural Resources Identification Report identified two built environmental resources within the Northwest Preferred Project Area, one built environmental resource adjacent to the Northwest Project Area, one built environmental resource within the now abandoned Southeast Project Area, and one built environmental resource adjacent to both Project Areas. Only the cultural resources identified within or adjacent the proposed Police Training Facility (Northwest Project Area) are listed below.

Table CR-1.
Cultural Resources Identified within and Adjacent to Project Areas

Resource Name	Built Date	Resource Type	Location	Impact by Project
Northwest Area Power Administration Transmission Line	Circa 1960	Transmission Line	Within Northwest Project Area	No Direct Impact
Pacific Gas & Electrical Company Transmission Line	Circa 1960	Transmission Line	Within Northwest Project Area	No Direct Impact
Animal Husbandry Features	Unknown	Animal Husbandry	Adjacent to Northwest Project Area	No Direct Impact
White Slough Water Pollution Control Facility	1966	Industrial Facility	Adjacent to Northwest Project Area	No Direct Impact

The Project will not directly impact the above built environment cultural resources identified, and evaluation of the resources for the California Register is not recommended by Michael Baker. Evaluation of the resources is, however, recommended should Project plans change to directly impact resources. Impacts to built environment resources should be avoided by Project activities, but if such impacts cannot be avoided, the resources would be evaluated for their California Register eligibility. If the resources are not California Register-eligible, no further protection will be performed. If the resources are California Register-eligible, they would be protected from Project-related impacts, or such impacts would be mitigated. Mitigation might consist of, but is not necessarily limited to, Historic American Engineering Record, Historic American Building Survey, and Historic American Landscape Survey mitigation documentation. Public educational outreach may also be appropriate.

- b) **Less than Significant with Mitigation Incorporated.** A significant impact would occur if the Project causes a substantial adverse change to an archaeological resource through demolition, construction, conversion, rehabilitation, relocation, or alteration. No archaeological resources were identified within the Project Area. However, archaeological resources may exist within the Project Area. In the event that archaeological resources are observed during Project construction-related activities, **Mitigation Measure CR-1** is in place to reduce impacts to a less than significant level. Therefore, the impact on archaeological resources is considered less than significant with mitigation incorporated.

Cultural Resources Mitigation Measure 1

If prehistoric or historic-period archaeological deposits are discovered during Project activities, all work within 25 feet of the discovery should be redirected and the archaeologist should assess the situation, consult with agencies as appropriate, and make recommendations regarding the treatment of the discovery. Impacts to archaeological deposits should be avoided by Project activities, but if such impacts cannot be avoided, the deposits should be evaluated for their California Register eligibility. If the deposits are not California Register-eligible, no further protection of the finds is necessary. If the deposits are California Register-eligible, they should be protected from Project-related impacts, or such impacts should be mitigated. Mitigation may consist of, but is not necessarily limited to, systematic recovery and analysis of archaeological deposits, recording the resource, preparation of a report of findings, and accessioning recovered archaeological materials at an appropriate curation facility. Public educational outreach may also be appropriate.

- c) **Less than Significant with Mitigation Incorporated.** A significant impact may occur if grading or excavation activities associated with the proposed Project would disturb paleontological resources or geologic features that exist within the Project site. No paleontological resources or unique geologic features have been noted on the surface of the Project site. The likelihood of paleontological resources or unique geologic features being present subsurface within the boundaries of the proposed Project is unlikely given the rapid rate of deposition in the area. The possibility exists, however, that previously unidentified paleontological resources could be encountered during ground-disturbing activities associated with the proposed Project and therefore is considered a potentially significant impact if mitigation measures are not implemented. Implementation of **Mitigation Measure CR-2 and Mitigation Measure CR-3** would ensure that any previously unidentified paleontological resources encountered during ground disturbing activities for the proposed project would be managed in accordance with applicable

regulations. Therefore, the impact on paleontological resources is considered less than significant with mitigation incorporated.

Cultural Resources Mitigation Measure 2

Should paleontological resources be identified on the Project site during any ground disturbing activities related to the Project, all ground disturbing activities within 100 feet of the discovery shall cease and the City of Lodi shall be notified within 24 hours of the discovery. The Project applicant shall retain a qualified paleontologist to provide an evaluation of the find and to prescribe mitigation measures to reduce impacts to a less than significant level. In considering any suggested mitigation proposed by the consulting paleontologist, the Project applicant shall determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, Project design, costs, specific plan policies and land use assumptions, and other considerations. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery) shall be instituted. Work may proceed on other parts of the project site while mitigation for paleontological resources is carried out.

Cultural Resources Mitigation Measure 3

Any human remains encountered during Project ground-disturbing activities should be treated in accordance with California Health and Safety Code Section 7050.5. The lead agency should inform its contractor(s) of the sensitivity of the Direct Area of Potential Effect for human remains and verify that the following directive has been included in the appropriate contract documents:

If human remains are encountered during Project activities, the Project shall comply with the requirements of California Health and Safety Code Section 7050.5. There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the county coroner has determined the manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation or to his or her authorized representative. At the same time, an archaeologist shall be contacted to assess the situation and consult with agencies as appropriate. Project personnel/ construction workers shall not collect or move any human remains and associated materials. If the human remains are of Native American origin, the coroner must notify the Native American Heritage Commission within 24 hours of this identification. The Native American Heritage Commission will identify a Native American Most Likely Descendant to inspect the site and provide recommendations for the proper treatment of the remains and associated grave goods.

VII. Energy

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

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

- a) **Less than Significant Impact.** The primary energy demands for the project during construction would be associated with construction equipment and vehicle fueling. A significant portion of site revegetation and site grading had occurred on-site, associated with the construction of the Prop 84 Ponds. The proposed project does not require unusual use of construction equipment that would be less energy efficient than other comparable construction projects. The proposed project will result in a slight increase in energy demands associated with the operation of the firing range which are reported and discussed in the air quality and greenhouse gas section of the IS/MND. Operations under the proposed project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. This is a less than significant impact.
- b) **Less than Significant Impact.** The project construction activities would use equipment and vehicles in compliance with Federal and State standards for fuel efficiency. As described above, the project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. This is a less than significant impact.

VIII. Geology and Soils

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<i>Would the Project:</i>				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	■	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	■	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	■	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	■
b. Result in substantial soil erosion, or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	■	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	■	<input type="checkbox"/>

Terracon Consultants, Inc. (Terracon) completed a Geotechnical Engineering Services Report (included in Appendix F) for the proposed Lodi Police Shooting Range project, dated December 19, 2019. The Project will 300-yard, 200-yard, 100-yard, 75-yard, and 25-yard shooting ranges surrounded by 10-foot high Hesco™ walls; an explosive ordinance demolition bunker; a 15-foot high earthen embankment; a 40-foot by 24-foot classroom building, mobile restroom, multiple storage containers, an access road, and a defensive driving course. The Project is in a preliminary design stage and conceptual at the time geotechnical services were provided; the project will likely be developed in phases depending on funding. Terracon's report presents the results of subsurface exploration, including findings on subsurface soil conditions, groundwater conditions, site preparation and earthwork, excavation considerations, seismic site classification per 2016 California Building Code, foundation design and construction, floor slab design and construction, lateral earth pressures, and pavement design and construction considerations. Their report also provides geotechnical recommendations for earthwork and the design and construction of grading/slopes for the proposed project.

Terracon also completed a Final Geotechnical Engineering Services Report, dated December 16, 2016, for the White Slough Tertiary Ponds, located at 12751 N Thornton Road, Lodi, California. The White Slough Tertiary Ponds report information include faulting and seismic considerations for the Prop 84 Ponds. Based on the close proximity of the Prop 84 Ponds project site, this study is referenced below.

a) **Less than Significant Impact.**

- i. **Less than Significant Impact.** The subject site is located in the California Central Valley Area, which is a relatively low to moderate seismically active area. The Project area is not listed within a State designated Alquist-Priolo Earthquake Fault Zone. There are no mapped surface or subsurface faults that traverse the Project area per review of Fault-Rupture Hazard Zones in California, Special Publication 42. Hence, the type and magnitude of seismic hazards affecting the site are dependent on the distance to causative faults and the intensity and magnitude of the seismic event (Terracon, 2016). According to County Wide General Plan (Public Health and Safety Volume 1) of the known fault lines in San Joaquin County, none are classified by the State Geologist as active, however, likely sources of seismic hazards potentially exist from the San Andreas, Hayward, Calaveras, Midland, Green Valley-Concord or Tracy-Stockton Faults, amongst others. The following table indicates the distances of key faults and the associated maximum credible earthquake that can be produced by nearby seismic events, as calculated using the United States Geologic Survey 2008 Interactive Deaggregations program. The Green Valley Connected Characteristic Fault, which is located about 56 kilometers from the site, is considered to have the most significant effect at the site from a design standpoint (Terracon, 2016). Construction will be required to meet the design standards set forth in the County of San Joaquin and City's Standards, and given the distance of these faults, earthquake hazard is considered to have a **less than significant impact**.

Table GS-1.
Distances of Key Faults and Associated Maximum Credible Earthquake

Fault Name	% Contribution	Approximate Distance to Site (km)	Maximum Credible Earthquake (MCE) Magnitude
Green Valley Connected Characteristic Fault	4.11	56.2	6.89
Mount Diablo Thrust D2.1 & D2.4, C	3.28	47.2	6.61
Greenville Connected Characteristic Fault	3.22	44.6	6.89

- ii. **Less than Significant Impact.** In general, strong ground shaking from an earthquake is the cause of most seismic ground shaking damage. Based on the likely sources of seismic shaking per the aforementioned faults, the probability of a seismic ground-shaking occurrence affecting the proposed Project site is moderately high. The California Building Code Site Classification (2016) for the proposed project site is D, corresponding to a stiff soil profile. From this, the USGS Design Maps Detailed Report evaluates the Peak Ground Acceleration (PGA) to be 0.368g. Based on the 2008 interactive deaggregations, the PGA at the subject site for a 2% probability of exceedance in 50 years (return period of 2475 years) is expected to be about 0.439g (Terracon, 2016). These peak ground accelerations are relatively moderate. The proposed project, however, is not located within an Alquist-Priolo Earthquake Fault Zone. Seismic design requirements will be incorporated into the final design and construction of the Training Facility. Strong seismic ground shaking is considered to have a less than significant impact.

- iii. **Less than Significant Impact.** Liquefaction is a mode of ground failure that results from the generation of excess pore-water pressures during earthquake ground shaking, causing loss of shear strength. This phenomenon generally occurs in areas of high seismicity, where groundwater is shallow, and soils are loose and granular. Strong seismic shaking can also cause cyclic softening of saturated relatively non-plastic fine-grained soils. The California Geologic Survey (CGS) has designated certain areas within California as potential liquefaction hazard zones. These are areas considered at risk of liquefaction-related ground failure during a seismic event, based upon mapped surficial deposits and the likely presence of a relatively shallow water table. This site is not mapped within a designated area of potential liquefaction hazard zone mapped by California Geologic Survey (Terracon, 2019).

However, due to the shallow depth to groundwater at the Prop 84 Pond location during the Final Geotechnical Engineering Report by Terracon in 2016, and the relatively cohesionless soils encountered in exploratory borings at that time, Terracon conducted two liquefaction analyses with data from two borings located south of the proposed Training Facility (Terracon, 2016). Based on the analyses, the liquefaction potential is judged to be relatively low. In considering potential liquefaction-induced settlement at this site, Terracon also considered that the soils are Pleistocene age deposits, which do not typically undergo liquefaction due to aging effects (Terracon, 2016).

Standard design and construction techniques would be used to mitigate the potential for damage due to seismically induced settlement. Based on the planned mitigation, and lack of proposed structures, potential for liquefaction is considered **less than significant**.

- iv). **No Impact.** The Project area is located on geographically level terrain (average grade less than five degrees) considered insufficient to produce a landslide. The Project area is not located within an earthquake-induced landslide zone (defined as “an area where previous occurrence of landslide movement, or local topographic, geological, geotechnical and subsurface water conditions indicate a potential for permanent ground displacement”) per the reviewed Official Maps of Seismic Hazard Zones provided by the State of California Department of Conservation. As a result, no impacts related to landslides are anticipated.
- b) **Less than Significant Impact.** The soil onsite is suitable for use as fill. Complete stripping of the topsoil should be performed in the proposed building and parking/driveway areas. The Project will be subject to the County's Grading Ordinance and the County of San Joaquin and City's Design Standards to reduce erosion impacts. As a normal and standard requirement, the Project would be required to prepare and have approved individual Stormwater Pollution Prevention Plans (SWPPPs) that mandate construction and post-construction water quality provisions, including but not limited to erosion control plans during construction. As a result of these standard engineering measures, the Project would have a less than significant impact on substantial soil erosion and issues resulting from the removal of topsoil during and after the construction process.

Regarding erosion of the 15-foot embankment structures, Terracon recommends the embankment slopes be covered with an erosion control measure immediately after construction. The surface soils at the site primarily consist of silty sands and sandy silts which are typically subject to significant wind/water erosion. The project civil engineer,

while developing the plans, should plan to limit wind/water erosion during and after construction. Rip rap or other erosion control measures, such as vegetation or jute netting, should be implemented to reduce the potential for erosion. Some minor and relatively shallow erosion should be anticipated and planned for. Routine maintenance will be required on all embankment slopes. A rigorous program of reducing the amount of animal burrows should be in place to reduce the potential for seepage-related problems (Terracon, 2019). As a result of these standard engineering measures, the embankments should experience a less than significant amount of soil erosion.

- c) **Less than Significant Impact.** The Geotechnical Engineering Services Report performed by Terracon (2019) for the Lodi Police Shooting Range project identified near surface soils consisted of dense silty sand and stiff sandy silt soils that extended to depth between 2.5 and 4 feet below ground surface (bgs). These soils were underlain by interbedded layers of loose to dense sands with varying amounts of silt, very stiff to hard silts with varying amounts of sand, and very stiff to hard lean clay with varying amounts of sand that extended to maximum depths explored (51 feet bgs). The lean clay soils encountered below a depth of 5 feet bgs and therefore the potential for seasonal volume changes from varying moisture contents (shrink/swell) is low and should not affect the support of structures (Terracon, 2019).

Depth to groundwater encountered during the Terracon field investigation varied between 4 and 7 feet bgs. Groundwater level fluctuations occur due to seasonal variations in the amount of rainfall, water in the adjacent slough, irrigation of adjacent fields, runoff, and other factors that may not be evident at the time of the exploratory borings. As discussed above, liquefaction potential is considered low for the project based on previous liquefaction analysis conducted by Terracon (2016) located south of the proposed Training Facility, liquefaction potential is judged to be relatively low (Terracon, 2016). Therefore, the potential for liquefaction or collapse is considered **less than significant**.

The site and region are located on relatively flat topography, therefore the potential for on or off-site landslides are considered **no impact**.

Significant subsidence/collapse potential of soils beneath the site is anticipated to be low due to the shallow groundwater; future land subsidence due to groundwater pumping is anticipated to be low due to the proximity to the bay, relatively constant historic groundwater depth, and the proposed reuse of water from the WPCF rather than depletion of groundwater resources. This is a **less than significant impact**.

IX. Hazards and Hazardous Materials

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<i>Would the Project:</i>				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Safety is the most important aspect of range design. The proposed Police Training Facility would consist of several live ammunition outdoor firing ranges, a detonation bunker, and a driving course. Range operation will consist of safety rules and policies users will be required to follow and policies related specifically to the types of shooting activity (type of caliber and firearms, and explosive safety handling procedures, for example) will be drafted and incorporated into practice. The final design will take into account several factors that are responsible for the development of a safe range, such as proper range site selection, range design consistent with the *Range Design Criteria U.S. Department of Energy* (2012) guidance document, and clear safety procedures and policies. As discussed in the project description, the firing range will be constructed with safety features such as bullet traps, target berms with thick ballistic sand, high Hesco walls, back and side berms with appropriate slope, and emergency access lanes for all ranges.

The proposed Training Facility will utilize ammunition containing lead; therefore, lead contamination is a concern for the site. As discussed in the Project Description, The City of Lodi Police Training Facility will develop and incorporate an effective Lead Hazard Management Plan with site-specific BMPs for lead conditions. The BMPs will ensure containment of lead bullets while preventing lead migration off site as well as implement routine lead removal and recycling practices.

a,b) **Less than Significant Impact with Mitigation Incorporated.** As discussed above, the proposed Police Training Facility could pose a threat to users and the environment, based on the use of firearms, defensive driver training course, and an explosives bunker. The shooting ranges and driving course at the Training Facility will be primarily utilized by professional law enforcement and only open to the public on special occasions. To reduce risks associated with firearms usage and explosive detonation activities, the facility would have clearly defined rules and policies and a strict policy of compliance.

Construction Activities:

The proposed Project would involve construction activities that could result in the transport, use, and disposal of hazardous materials, such as gasoline fuels and lubricants; the transport, use, storage, and disposal of these materials would comply with existing regulations established by numerous agencies, including, but not limited to, the Department of Toxic Substances Control, the U.S. Environmental Protection Agency (EPA), the U.S. Department of Transportation, and the Occupational Safety and Health Administration. The potential accidental release of hazardous material through possible spills associated with the construction equipment, such as oil and/or hydraulic fluid would be mitigated through the implementation of **Mitigation Measure Hazards and Hazardous Materials 1**, which requires standard spill prevention measures and a procedure for spill response if one does occur, the impact would be less than significant.

Hazards and Hazardous Materials Mitigation 1

Spill Prevention and Control Measures will be implemented and include the following:

- Any fuel products, lubricating fluids, grease, or other products and/or waste released from the Contractor(s) vehicles, equipment, or operations, shall be collected and disposed of immediately, and in accordance with State, Federal, and local laws.
- Spill clean-up materials will be stored near potential spill areas (such as vehicle and equipment staging areas).
- Spill kits will include sorbent material (such as pads designed for oil and gas), socks and/or pads to prevent spread of hazardous material, and containers for storing and proper disposal.
- Employees and contractor(s) will be trained on proper hazardous spill clean-up practices.

Operational Activities:

Explosives Bunker:

Hazardous and explosive materials, including wastes relating to the operation of the proposed explosives bunker would be properly packaged in accordance with Department of Transportation (DOT) requirements for safe transportation. Only trained technicians would use designated vehicles for the transportation of hazardous materials, explosives, and waste related to explosives. Waste relating to the spent explosives would be

transported in accordance with DOT requirements to a designated waste management facility.

Hazardous materials adherence to safety policies as required by Department of Toxic Substances Control (DTSC), OSHA, and as described above by DOT, and by other regulatory agencies, reduces the hazards associated with the explosives bunker to less than significant levels.

Shooting Range:

As discussed above, the operation of the Facility will have clearly defined rules and operational procedures for user safety. The final project design will be consistent with the *Range Design Criteria U.S. Department of Energy* (2012) guidance document for range construction considerations, such as appropriately designed berms, bullet traps, range dividing ballistic walls, bio-swales, and bullet ricochet reduction measures.

Lead shot is not considered a hazardous waste under the Resource Conservation and Recovery Act (RCRA) at the time it is discharged from a firearm because it is used for its intended purpose, therefore, an RCRA permit is not required to operate a shooting range. Spent shot and bullets, however, are potentially subject to RCRA statutory authority including section 7002 and 7003; lead shot is not considered hazardous if it is being sent to a recycling facility in accordance with state law. The proposed project would be required to comply with all applicable local, state, and federal regulations. Project operations would require a site-specific lead hazard management plan, where project maintenance would include the effective capture, collection, and recycling of lead bullets as spent ammunition which would protect the training site and surrounding environment.

The final performance standards for the Training Facilities planning, construction, and operations will follow the United States Environmental Protection Agency (EPA) *Best Management Practices for Lead at Outdoor Shooting Ranges* manual published in June 2005. The City of Lodi Police Training Facility will develop and incorporate an effective Lead Hazard Management Plan with site-specific BMPs for lead conditions. Because specific BMPs to be implemented will be dependent on final draft designs, a site-specific lead management plan has not yet been developed. Potential BMPs to be incorporated into the site-specific lead hazard management plan are discussed below.

Control and contain lead bullets and bullet fragments:

The most effective BMP for managing lead in shooting ranges is bullet containment. Each shooting range is unique; therefore, containment design needs to be site-specific. Containment options for lead bullets include, but are not limited to:

- Earthen backstops;
- Sand traps;
- Steel traps;
- Lamella or Rubber Granule Traps; and
- Shock Absorbing Concrete

As noted in the EPA's *Best Management Practices for Lead at Outdoor Shooting Ranges* (2005), "some bullet containment devices are so comprehensive that they virtually eliminate lead's contact with the environment".

Prevent migration of lead to the subsurface and surrounding surface water:

BMPs are critical for all outdoor ranges for preventing lead migration in the environment. These BMPs include:

- Monitoring and adjusting soil pH;
- Immobilizing lead; and
- Controlling runoff.

Lime addition BMP:

Since lead mobility increases with low pH (acidic soils) the BMP for monitoring and adjusting pH is an important range BMP. The ideal soil pH value for shooting ranges is between 6.5 and 8.5 (EPA, 2005). A corrosivity test which included pH testing of one boring samples (B4) obtained for the Lodi Police Shooting Range Geotechnical Engineering Report (Terracon, 2019) indicated the soil in the project area has pH of 8.37 from a sample depth of 1.0 - 2.5 feet below ground surface. This is consistent with the Guard soil mapped on-site using the UC Davis California Soil Resource Lab Soil Survey mapping tool; according to the Soil Survey, Guard soil has a pH of approximately 8.2 indicating a site-specific soil less likely to contribute to facilitating lead mobility in the surrounding environment. The BMP Guidance (EPA, 2005) recommends spreading lime to raise pH if the soil is less than 6.

Immobilizing Lead:

One way to immobilize lead is by monitoring and controlling the pH of soil (if needed), as discussed above. Another BMP for immobilizing lead is phosphate spreading. This method is recommended by the BMP Guidance (EPA, 2005) where lead is widely dispersed in range soils, a range is closing, or there is a high potential for vertical lead transport to groundwater, such as site conditions with shallow groundwater. The addition of phosphate binds lead particles, with rock phosphate considered a best choice if water is located nearby since phosphate could potentially contribute to algal blooms.

Controlling Runoff:

BMPs for controlling soil erosion and surface water runoff are imperative for preventing lead from migrating off site. There are two factors that influence the amount of lead that can potentially be transported off-site: (1) the amount of lead fragments on the range and (2) the velocity of the runoff. The Guidance manual (EPA, 2005) recommends several options for controlling runoff, such as planting vegetation and utilizing organic ground cover, as well as implementation of engineered runoff controls. Some recommended engineered runoff controls include (1) filter beds, (2) containment traps and detention ponds, (3) dams and dikes, and (4) ground contouring. The City of Lodi would consult with licensed professionals to develop site specific BMPs that would prevent migration of lead to the subsurface and surrounding surface water near the site.

Lead Removal and Recycling:

The most important BMP for lead management is lead reclamation. The proposed Project would implement a regular reclamation schedule as part of the BMPs and would assign the appropriate site-specific frequency and methods of lead removal which would be transported to a lead reclamation facility.

Documentation and Record Keeping:

Good record keeping and documenting is important for effective lead management at a range. Records would be kept that document all activities which occur at the range regarding the BMPs and lead reclamation schedule.

As discussed above, there are many options for the management of lead at shooting ranges. A comprehensive Lead Hazard Management Plan will be required mitigation (**Hazards and Hazardous Materials Mitigation 2**) and would be implemented for the site-specific conditions, therefore, the potential for release of hazardous materials due to shooting range activities would be **less than significant**.

Hazards and Hazardous Materials Mitigation 2

A site-specific Lead Hazard Management Plan will be developed for the Police Training Facility. Best Management Practices will consist of environmentally protective, site-specific lead management techniques to address (1) lead bullet control and containment, (2) prevention of lead migration to subsurface and surrounding surface water bodies and (3) lead removal and recycling. The lead hazard management plan will require comprehensive record keeping and documentation.

- c) **No Impact.** The project is not located within one-quarter mile of an existing or proposed school.
- d) **Less Than Significant Impact.** The project takes place within the boundary of the WPCF facility grounds. The project is not included in any hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, **no impact** would occur.
- e) **Less than Significant Impact With Mitigation.** The proposed Project lies within the Kingdon Executive Airport's Zone 8 Area of Influence (AIA) identified in the San Joaquin County Airport Land Use Compatibility Plan (ALUCP) (Figure 8) California law defines the area of influence as the "area where airport-related factors may significantly affect land uses or necessitate restrictions on those uses as determined by an airport land use commission". Moreover, the ALUCP states, "The AIA indicates those areas in which current or future airport-related over-flights, noise, safety, or airspace protection conditions may significantly affect land uses and may require land use restrictions to address those conditions. The airport influence area indicates the area within which the Airport Land Use Commission (ALUC) review of certain land use actions is required".

General hazards to be considered in a review by ALUC include:

- Visual hazards, including tall buildings, distracting lights, glare, sources of dust, steam or smoke;
- Electronic hazards that may cause interference with aircraft communications and/or navigation;
- Hazards to aircraft in flight.

The Kingdon Executive Airport is a private airport with public access. The one runway located at the Kingdon Executive Airport, oriented northwest/southeast and measuring 3,705 feet in length and 60 feet in width, is located approximately 8,500 feet east of the closest point on the eastern boundary of the proposed Project, nearest the proposed driving course and parking portions of the proposed Facility. In 2015, the Kingdon Air Park reported about 8,000 annual operations (takeoffs and landings). The long-range forecast

for anticipated annual aircraft operations is 84,500, although no data or analytics are provided to determine when or how these operational numbers are expected to occur (Wallace Environmental Consulting, Inc.).

Research performed by Wallace Environmental Consultants regarding the Prop 84 Ponds adjacent south of the proposed Police Training Facility indicate none of the tracks created by aircraft when arriving, departing or during pilot training, including touch-and-go tracks, cross over the preferred alternative WPCF expansion pond location, and therefore, also not over the adjacent north proposed Project. Based on normal aircraft operations, most aircraft are probably at an altitude of 800 to 1,000-feet when they pass over the existing WPCF ponds (Wallace Environmental Consultants, Inc.).

Most federal aviation land use guidelines for development within the vicinity of an airport address impacts caused by aircraft noise or the construction of objects that penetrate federally regulated airspace. In the case of the proposed Police Training Facility, neither of these general conditions is an issue. Regarding the proposed Project, the central land use issue is the construction of a Police Training Facility that proposes to incorporate a detonation area and the potential creation of a detonated explosives causing a large plume of smoke, dust, or debris.

According to a letter dated September 26, 2019 from the San Joaquin Council of Governments, acting as the Airport Land Use Commission (ALUC), SJCOG staff request that the Lodi Policy Department notify Kingdon Airport prior to detonating any explosives that may cause large plumes of smoke, dust, or debris, as a condition of approval of the project. In the event that Lodi Police Training Facility will be detonating any explosives that may have the potential to cause large plumes of smoke, dust, or debris, **Mitigation Measure Hazards and Hazardous Materials 2** is in place to mitigate potential impact(s) that may impair pilot visibility. With the implementation of **Mitigation Measure Haz-2** the proposed project will have a less than significant impact.

Hazards and Hazardous Materials Mitigation Measure 3

The Lodi Police Training Facility will notify Kingdon Airport prior to detonating any explosives that may cause large plumes of smoke, dust, or debris.

Kingdon Air Park is not a federally obligated airport; it is not eligible for federal airport improvement grants and is not part of the National Plan of Integrated Airport Systems. Nevertheless, regardless of location within San Joaquin County, ALUC review is required in addition, to Federal Aviation Administration (FAA) notification in accordance with Code of Federal Regulations, Part 77 (<https://oeaaa.faa.gov/oeaaa/external/portal.jsp>) for any proposal for construction or alteration under the following conditions:

- a. If requested by the FAA
- b. Any construction or alteration that is more than 200 AGL at its site.
- c. Any construction or alteration that exceeds an imaginary surface extending outward and upward at any of the following slopes:
 - i. 100 to 1 for a horizontal distance of 20,000 ft. of a public use or military airport from any point on the runway of each airport with its longest runway more than 3,200 ft.
 - ii. 50 to 1 for a horizontal distance of 10,000 ft. of a public use or military airport from any point on the runway of each airport with its longest runway no more than 3,200 feet.

- iii. 25 to 1 for a horizontal distance of 5,000 ft. of the nearest takeoff and landing area of a public use heliport.
- d. Any highway, railroad, or other traverse way whose prescribed adjusted height would exceed the above noted standards.
- e. Any construction or alteration located on a public use airport or heliport regardless of height or location.

The proposed Project does not meet the conditions listed above for requiring additional FAA notification, therefore, the City of Lodi will not be submitting FAA Form 7460-1, Notice of Proposed Construction or Alteration, unless further specified by the FAA.

The Project involves the construction of a Police Training Facility. Potential dust, smoke and debris from construction phases and explosive detonations that could pose a hazard will be mitigated as discussed above. Otherwise, no tall buildings, sources of light, steam, or electric hazards are associated with the proposed Project that could pose a hazard; however, it is important to note pre-existing structures that may be viewed as a potential hazard to aircraft in the vicinity of Kingdon Air Park.

Regarding electric hazards, an overhead high voltage (230 kV) dual electrical transmission line traverses the WPCF from north to south and is near the eastern boundary of the proposed Project. The transmission line is approximately 100-feet tall and about 8,100-feet west of Kingdon Air Park, it is at the western limit of flight tracks shown on ALUCP, Exhibit AKA- 1. High voltage power transmission lines pose peculiar hazards to low flying aircraft and the FAA specifies that such structures be marked and lighted. Aircraft operating over or near the transmission lines are typically at an altitude of 800 to 1,000 feet, so there is little threat of electrical interference with communication and navigation devices (Wallace Environmental Consultants, Inc.).

Regarding existing hazards associated with steam or smoke, in 2012 the California Energy Commission and Northern California Power Agency constructed a natural gas-fired 255-megawatt power generation facility with an evaporative cooling system on about 4.5-acres of the WPCF. The power plant emits thermal plumes in the form of steam generated by its cooling towers. Although the FAA has found that thermal emission is not likely to pose a threat to aircraft, it is recommended that aircraft maintain a vertical separation of 1,000 feet above such facilities. This is the existing vertical separation distance for aircraft using designated Kingdon Air Park flight tracks, so the power plant has a less than significant impact on aircraft (Wallace Environmental Consultants, Inc.).

Regarding existing wildlife hazards, San Joaquin County Mosquito and Vector Control District operates the White Slough Mosquitofish Rearing Facility on the WPCF property. The district operates about 8 acres of rearing ponds for mosquitofish (*Gambusia affinis*), which produce several thousand pounds of fish annually. The ponds attract a variety of bird species including herons and egrets, which feed on the mosquitofish in the shallow rearing ponds (Wallace Environmental Consultants, Inc.).

These structures and facilities are already in existence and currently do not pose any notable threat to air-traffic safety for any of the reasons in the consistency analysis components listed above. They do not affect the proposed project or any associated future hazards.

During Project construction, dust may be generated. However, this will be temporary and

mitigated by Air Quality Mitigation 2 (Section III – Air Quality). Therefore, the main hazard of concern is hazard to aircraft in flight due to the potential for detonated explosives that may cause large plumes of smoke, dust, or debris.

Therefore, considering the existing use, the historic permitted use for this type of project, and overall reduced flight pattern to avoid current power lines and existing structures, the potential for dust generated during construction will be mitigated by the Air Quality Mitigation 2 (Section III – Air Quality) and potential dust, smoke, and debris from the detonation area will be mitigated by Mitigation Measure Hazards and Hazardous Materials 1, and will be less than significant with mitigation.

f) **Less than Significant Impact.** The Project involves the construction of a Police Training Facility within the White Slough WPCF property boundary. There would be sufficient space along the gravel access road to allow emergency vehicles to pass one another. The Project would not interfere with road access, adopted emergency response plan or emergency evacuation plans for safety vehicles or personnel. Less than significant impact is expected.

g) **No Impact.** The Project is located within agricultural land use. The Project will not expose people or structures to a significant risk of loss, injury or death involving wildland fires. No impact is expected.

X. Hydrology and Water Quality

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

The City intends to construct and operate a Police Training Facility located at the White Slough Water Pollution Control Facility. Surface waters in the region of the WPCF include the Sacramento-San Joaquin Delta (Delta), Lower Mokelumne River, Calaveras River, and a peripheral canal (I-5). The facility is located within the legal boundary of the Delta, as well as within the 1-in-100-year flood zone. The surface waters near the proposed project include the Prop 84 Ponds adjacent south, with the I-5 Peripheral Canal and Dredger Cut approximately one-quarter mile south-southwest of the proposed Training Facility. Dredger Cut is a tributary to White Slough and eventually to the San Joaquin River. The variation of surface water levels in the adjacent Delta is associated with tidal fluctuations.

Based on previous site-specific studies, including the Surface Pond Percolation Study Draft (Petrilogix, 2016), the proposed project area likely has a depth to groundwater of four to six feet below ground surface, indicating a shallow table. Groundwater elevations in the western

portion of the site, near the proposed Training Facility, fluctuate in response to precipitation in non-irrigation season and groundwater pumping during irrigation season. The western portion of the site where the Training Facility is proposed only fluctuates a few feet seasonally, indicating the western portion as an area of recharge (West Yost Associates, 2015).

The construction will take place on City-owned agricultural land within the boundaries of the WPCF, and not within county road ditches or waterways. As part of the Prop 84 Ponds project, the bulk of devegetation and grading has been completed at the proposed Training Facility site; additional construction impacts will be temporary and best management practices will be in place. The Project will include the preparation of a Stormwater Pollution Prevention Plan (SWPPP) and Best Management Practices based on a comprehensive Lead Management Plan to reduce construction and operational impacts to water ways and groundwater.

- a) **Less Than Significant Impact.** The proposed Project will occupy approximately 20 acres on the White Slough WPCF property. The proposed Police Training Facility is located on a portion of the site that has undergone extensive devegetation and grading to accommodate the construction of the Prop 84 Ponds. However, the further disturbance of the area to construct the proposed Facility could potentially degrade surface water due to erosion or after the project is completed, primarily associated with the lead bullets used at the firing ranges. Likewise, groundwater degradation could potentially occur due to the high groundwater table and lead associated with bullets at the firing ranges. Construction activities on areas one acre or greater are required by the Central Valley Regional Water Quality Control Board (CVWQCB) to obtain a General Construction Activity Stormwater Permit and a National Discharge Elimination System (NPDES) permit. These permits are required to control activities that could potentially degrade water quality. The City will prepare and retain a Stormwater Pollution Prevention Plan that characterizes the Facilities potential erosion and sediment control(s) and waste disposal requirements for both construction and operational phases and will include storm and non-storm water management controls and best management practices.

As discussed in the project description, the proposed project will require a comprehensive lead management plan due to the firing range and use of lead bullets for firearms training. As discussed in the Hazards section of the IS/MND, the lead management plan would require bullets to be effectively contained within the project boundary, with lead migration mitigated, stormwater contained, and lead bullet debris regularly recovered and recycled. With the implementation of the lead management plan, and compliance with required NPDES permitting, the project would not substantially degrade surface or groundwater quality. This is a less than significant impact.

- b) **Less than Significant Impact.** The facility use numbers and schedule are still in the conceptual phase, however, the expected number of average numbers of daily facility users is not likely to exceed 40 people, and maximum users anticipated for a single day is not likely to exceed 80 people in a day. The project use water consumption would not decrease groundwater recharge such that the project would impede sustainable groundwater management. Therefore, the project does not deplete groundwater supplies or interfere with groundwater recharge and may actually increase groundwater storage. Therefore, this is considered a less than significant impact.
- c) **Less Than Significant Impact.** No streams or other drainage ways are located within the proposed Training Facility location. Although a canal does run through the WPCF

property, it is not located in the proposed Training Facility location. The Project will not alter or change drainage ways. Erosion and/or sedimentation will be avoided or reduced below a level of significance through conformance with applicable elements of the County of San Joaquin Stormwater General Construction Permit and City of Lodi Municipal Stormwater General Construction Permit. The Project will also include the preparation of a Stormwater Pollution Prevention Plan (SWPPP) to reduce construction impacts to waterways and neighboring sites.

i-iv. Less than Significant Impact. The project site has previously undergone revegetation and grading phases for the Prop 84 Ponds project. While the design draft is still incomplete, impervious surfaces created with respect to the project may include the parking area and classroom/restroom facilities which is considered less than significant. The project will have an adequate drainage system for directing and receiving stormwater runoff flows which will include properly sized bio-swales and holding structures. As discussed above, the proposed project could potentially generate stormwater degraded by contact with lead from bullets used on-site, however, the new facility will incorporate an effective lead management program to protect the water quality. The project would have an effectively designed receiving water swale system and lead management plan, therefore, the impact would be less than significant.

d) Less Than Significant Impact. The proposed Project involves the construction of an approximately 20-acre Police Training Facility that includes a detonation bunker, a firing range, and defensive driver training course. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Map Number 06077C0285F, effective on October 16, 2009, the Project area is located within the AE Zone, with the Base Flood Elevation (BFE) indicated as 10 feet above mean sea level. The proposed Project site elevation ranges between approximately 7 to 10 feet above mean sea level. Because the entire Project site is located within the AE Zone, development on the site will have to comply with national flood insurance program (NFIP) regulations.

Dredger Cut and the Peripheral Canal are the closest levee related water bodies to the Project site and are considered to be legal waters of the Delta. The nearest large river or creek capable of causing major flooding during a 100-year flood event is the Calaveras River to the South and the Mokelumne River to the North. Bear Creek is the nearest smaller waterway and would be a potential cause of flooding during a 100-year flood event. The project would not change the bank configurations of any of the creeks, rivers, or levees that surround the site. Therefore, impact to flooding conditions are considered to be limited.

Because the proposed Project is located within a flood zone, as discussed above, the development of the Police Training Facility will have to comply with NFIP regulations. In addition, as recommended in the *Range Design Criteria* by the U.S. Department of Energy, the firing platforms and targets will be elevated above the flood level. The proposed Police Training Facility will develop and implement a Lead Hazard Management Plan with site-specific BMPs, which would collect, contain, and remove lead on a routine basis for the site, therefore further mitigating potential impacts to surface water associated with a potential flooding event. Because the project will comply with NFIP regulations, implement a Lead Hazard Management Plan with site-specific BMPs, and design firing platforms and targets above the flood levels for the site, the potential for release of pollutants due to project inundation is considered **less than significant**.

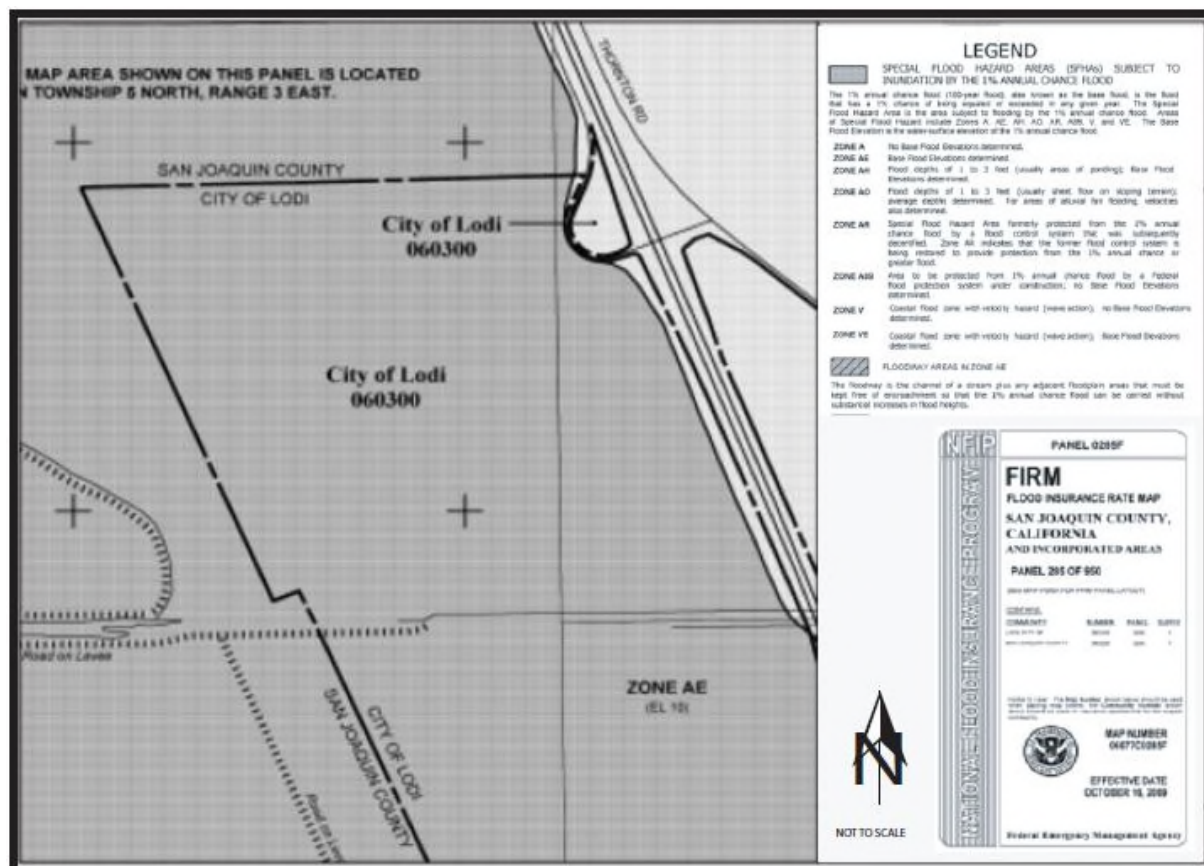


Figure 9 - Flood Zone Map

- e) **Less than Significant Impact.** The proposed Project will obtain a construction storm water general permit which will require the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). The proposed Police Training Facility will develop and implement a Lead Hazard Management Plan with site-specific BMPs, which would collect, contain, and remove lead on a routine basis for the site, therefore mitigating potential impacts to surface and groundwater which is consistent with the Central Valley Water Board's Antidegradation Implementation Policy to prevent pollution and maintain water quality. The proposed Project will not require significant groundwater resources and thus will not conflict or obstruct with the Eastern San Joaquin Groundwater Authority's *Groundwater Sustainability Plan* (2019). This is considered a less than significant impact.

XI. Land Use and Planning

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

a) **No Impact.** The physical division of an established community typically refers to the construction of a physical feature (such as an interstate highway or railroad tracks) or removal of a means of access (such as a local road or bridge) that would impair mobility within an existing community, or between a community and outlying area. The proposed Project will not physically divide an established community. No physical restraints to access are a part of this Project. The proposed Police Training Facility is located within the City-owned WPCF boundary. The general area consists of agricultural land with some rural residences. Current access to existing, nearby residences would not be impeded by construction and operation of the proposed Facility.

b) **Less Than Significant Impact With Mitigation Incorporated.** The City of Lodi General Plan designates the WPCF as “Industrial” and the surrounding City-owned agricultural fields where the Police Training Facility is proposed as “Public/Quasi-Public”. This is consistent with the current site land use. The Project also does not propose to change any existing zoning.

The San Joaquin Council of Governments (SJCOG), acting as the Airport Land Use Commission (ALUC), has reviewed the proposed project description for the Police Training Facility. The proposed project is located within Kingdon Airport’s Zone 8 (Area of Influence). Based on the Airport Influence Area (AIA) Zone 8, there is concern for the potential of dust, or smoke created from detonation area that may impair pilot visibility. Therefore, ALUC requests that Kingdon Airport be notified prior to detonating any explosives that may cause large plumes of smoke, dust, or debris, as a condition of approval of this project. In the event that Lodi Police Training Facility will be detonating any explosives that may have the potential to cause large plumes of smoke, dust, or debris, **Hazards and Hazardous Materials Mitigation Measure 2 (Haz-2)** is in place to mitigate potential impact(s) that may impair pilot visibility. With the implementation of **Mitigation Measure Haz-2** the proposed project will have a less than significant impact.

XII. Mineral Resources

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

According to the San Joaquin County General Plan, the primary extractive resources in San Joaquin County are sand, gravel and natural gas.

a,b) **No Impact.** The current use of the proposed Project site consists of the City of Lodi's main wastewater treatment facilities and surrounding agricultural land. According to the State Aggregate Resource Areas Map, and per the Significant Natural Resources of San Joaquin County, within the Resources element of the San Joaquin County General Plan, the proposed Project site is not located within an area of primary extractive resources. Therefore, there is **no impact**.

XIII. Noise

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

Regulatory Setting

The City of Lodi addresses noise (defined generally as unwanted or undesirable sounds) within the Noise Element of the General Plan and in the Noise Ordinance. Noise exposure City standards as designed in the General Plan have been designed to protect sensitive uses (schools, libraries, churches, hospitals, nursing homes) and community members from noise hazards and to establish criteria in which to mitigate noise generating development.

City of Lodi General Plan Noise Standard are shown in the table below:

Table N-1. Community Noise Exposure Matrix

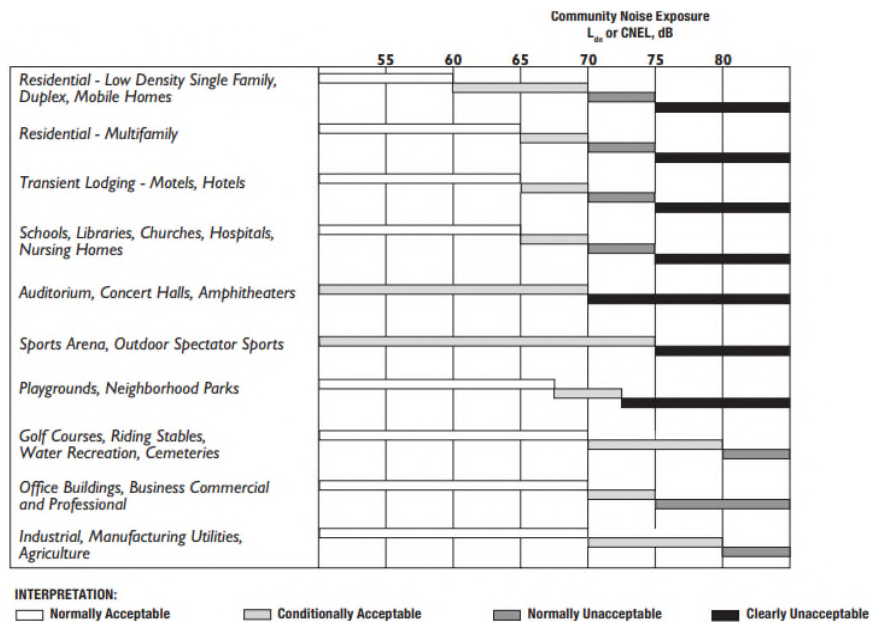


Table N-1 presents the City of Lodi's community noise exposure matrix which demonstrates the compatibility of land uses at various noise levels which the City can use to evaluate land use decisions. As stated in the General Plan, land uses are either classified as being "normally acceptable", "conditionally acceptable", and "clearly unacceptable".

- a) **Less Than Significant Impact.** The proposed Project is located within the WPCF facility boundary in an agricultural area. Agricultural fields with few rural residences are located in the area. Lima Ranch is located approximately 500 feet northeast of the eastern facility boundary, and the Kingdon Airport is located 0.60 miles east-northeast of the eastern facility boundary. Few sensitive receptors are located within the immediate vicinity of the Project site.

Project Construction:

The noise associated with the Project site will be from both construction and Training Facility operational activities. Due to the construction activities associated with the construction of the Prop 84 Ponds, a significant portion of devegetation and grading have occurred. Construction activities are not expected to last longer than 4 months, with much of the construction involving the import of structures, including modular and Hesco ballistic wall barriers. Therefore, any noise associated with construction will be short-term. Impacts are anticipated to be less than significant and will comply with the San Joaquin County and City of Lodi noise ordinance.

Project Operation – Firing Ranges:

The noise associated with the firing range will produce significant noise. However, due to the extreme distance from any sensitive receptors this is considered to be **a Less Than Significant Impact**. In addition to distances, onsite berm structures, including modular and Hesco ballistic wall barriers will reduce and capture the majority of the noise. Impacts are anticipated to be less than significant and will comply with the San Joaquin County and City of Lodi noise ordinance.

Project Operation – Detonation Bunker:

The noise associated with the detonation bunker will produce significant noise. However, due to the extreme distance from any sensitive receptors this is considered to be **a Less Than Significant Impact**. In addition to distances, onsite berm structures, including modular and Hesco ballistic wall barriers will reduce and capture the majority of the noise. Impacts are anticipated to be less than significant and will comply with the San Joaquin County and City of Lodi noise ordinance.

- b) **Less than Significant Impact.** The proposed Project is located within 1-mile of the Kingdon Airport, a private airport with public access, and falls within the Area of Influence (Figure 8). The nearest runway is approximately 8,220 feet to the east-northeast of the Project. The proposed Project is expected to have a less than significant impact upon the airport because no new residential population is being generated. No new residences or existing residences will be impacted by noise generated from the airport or overflights.

- c) **Less than Significant Impact.** The proposed Project is located within 1 mile of the Kingdon Airpark, a private airport with public access, and falls within the Area of Influence. The nearest runway is approximately 8,000 feet to the east-northeast of the Project. The distance of the proposed Project from the airport is enough that firing range participants would not be exposed to excessive air traffic noise. This is a less than significant impact.

XIV. Population and Housing

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<i>Would the Project:</i>				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Project proposes the construction of a police training facility. The project will not cause any population growth.

a-c) **No Impact.** The Project would not include the creation of new housing, nor displace any existing housing or people. Consequently, no impacts related to population and housing would occur.

XV. Public Services

Issues		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less- Than- Significant Impact	No Impact
a.	Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	■	<input type="checkbox"/>
b.	Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	■	<input type="checkbox"/>
c.	Schools?	<input type="checkbox"/>	<input type="checkbox"/>	■	<input type="checkbox"/>
d.	Parks?	<input type="checkbox"/>	<input type="checkbox"/>	■	<input type="checkbox"/>
e.	Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	■	<input type="checkbox"/>

a-e) **No Impact.** Construction and long-term operation of the proposed police training facility would not place any significant new demands on fire protection, police protection, schools, parks, or other public facilities because the Project would not involve the construction of facilities that require such services (e.g., residences).

XVI. Recreation

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a,b) **Less than Significant Impact.** The proposed Police Training Facility will not increase the use of existing neighborhood and regional parks, therefore there will be no impact on the potential physical deterioration of recreational facilities. This is a less than significant impact.

XVII. Transportation

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

a) **Less than Significant Impact** While construction trips would be necessary, given the scale of the project, the project would not substantially increase traffic congestion compared to existing conditions and road closures are planned. As discussed in project description, the Training Facility anticipates accommodating approximately 40 police officer currently serving the City of Lodi; a maximum of approximately 80 users in a single day may utilize the Facility on during special training/competition events, however, approximately 20 users per day including additional personnel is anticipated. There are no transit, bicycle or pedestrian facilities within the proposed project area that would conflict with the proposed project. This is considered a less than significant impact.

b) **Less than Significant Impact.** The City of Lodi Police currently travel out of the area to facilitate the critical need to develop and maintain firearms skills necessary for ensuring public safety. Currently, police training facilities available to the City of Lodi are located at greater distances (such as Tracy) from the proposed Project location.

As discussed in the CEQA Guidelines Section 15064.3(b.3), increased travel demand (normally measured in vehicle miles traveled or "VMT") can be an indicator of potential adverse environmental effects. Although there would be a need for some increased vehicle miles traveled to accommodate construction requirements, once the proposed project is completed, there would be a decrease in VMT, as Lodi PD will no longer need to travel to facilities located further away for required training. Upon completion of the proposed Project, VMTs will therefore decrease. This is considered a less than significant impact.

c,d) **No Impact.** The Project does not include design features that would increase hazards or incompatible uses, because the Project would not include the construction of any new streets or roads. The Project is located within the boundaries of the existing White Slough WPCF on City-owned land. Therefore, the proposed Project would not increase hazards due to a design feature, such as a sharp curve or dangerous intersection, incompatible uses, such as farming equipment, or inadequate emergency access.

XVIII. Tribal Cultural Resources

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

Tribal Cultural Resources are defined in CEQA as sites, features, places, cultural landscapes, sacred places, and objects of cultural value to a California Native American tribe listed or eligible for listing on the California Register of Historical Resources or included in a local register of historical resources.

Assembly Bill 52 Native American Consultation

Assembly Bill requires the lead agency to begin consultation with any California Native American tribe that is culturally and traditionally affiliated with the geographic area of the proposed project if the California Native American tribe requested to the lead agency, in writing, to be informed by the lead agency through formal notification within 14 days of determining application complete or public agency's decision to undertake the project. Upon formal notification, each California Native American tribe has 30 days to request consultation whereby the lead agency must initiate consultation within 30 days of the consultation request. Although the project is in an area previously subject to CEQA, and AB 52 was initiated for the location 2015 (Prop 84 Ponds), since it is a newly defined project, Petralogix requested an updated CEQA Tribal Consultation List pursuant to AB 52 early consultation on September 19, 2019. Project notification letters were addressed and sent to the all of the tribes provided by the Native American Heritage Commission (NAHC). Project notification letters and AB 52 consultation requests describing the proposed Police Training Facility Project were addressed and sent to all of the tribes provided by the NAHC, which includes Wilton Rancheria, Northern Valley Yokuts, Buena Vista Rancheria Me-wuk Indians, Lone Band of Miwok Indians, Torres Martinez Desert Cahuilla Indians, and the United Auburn Indian Community of the Auburn Rancheria. To date, no request for consultation has been received by any tribe(s), however,

Wilton Rancheria responded via email on October 10, 2019, with attached Mitigation Measures regarding the proposed project, discussed in subsection ii below.

Records Search

Michael Baker International (Michael Baker) completed a Cultural Resources Identification Report (November 2015) in support of the environmental review of the previously proposed Prop 84 Ponds; the currently proposed Police Training Facility project area is included in the previous investigation, with included archival research, a field survey, and Native American and historical society consultation. In addition to the previously mentioned investigation, Petralogix Engineering sent a letter describing the Police Training Facility project with maps depicting the project area to the State Historic Preservation Office on August 26, 2019. The letter requested any information or concerns about cultural resources in the project area; to date no response has been received by the State Historic Preservation Office.

a) **Less than Significant with Mitigation Incorporated.**

i. **Less than Significant with Mitigation Incorporated.** As discussed in Section 6, *Cultural Resources*, no cultural resources identified adjacent or within the proposed project area will be impacted by the proposed project. The Project will not directly impact the built environment cultural resources identified, and evaluation of the resources for the California Register is not recommended by Michael Baker. Evaluation of the resources is, however, recommended should Project plans change to directly impact resources. Impacts to built environment resources should be avoided by Project activities, but if such impacts cannot be avoided, the resources would be evaluated for their California Register eligibility. If the resources are not California Register-eligible, no further protection will be performed. If the resources are California Register-eligible, they would be protected from Project-related impacts, or such impacts would be mitigated. Mitigation might consist of, but is not necessarily limited to, Historic American Engineering Record, Historic American Building Survey, and Historic American Landscape Survey mitigation documentation. Public educational outreach may also be appropriate.

Because there is always the potential for impact to unidentified cultural resources, in the event that archaeological and/or paleontological resources are observed during Project construction-related activities, **Mitigation Measure CR-1 and Mitigation Measure CR-2** are in place to reduce impacts to a less than significant level. Mitigation Measures CR-1, CR-2 and CR-33 are presented in the Section VI. Cultural Resources.

ii. **Less than Significant with Mitigation Incorporated.** On September 19, 2019 the City of Lodi sent Native American early consultation letters to all the tribes that had requested formal notice of projects where AB 52 applies in Lodi (specifically, Wilton Rancheria, Northern Valley Yokuts, Buena Vista Rancheria Me-wuk Indians, Lone Band of Miwok Indians, Torres Martinez Desert Cahuilla Indians, and the United Auburn Indian Community of the Auburn Rancheria). In addition, Petralogix Inc. submitted a sacred land search (SLF) and request for a list of tribes affiliated with the project area to supplement the previous Cultural Resources Identification Report (November 2015) completed for the project area. No results for the SLF search have been received to date. The City of Lodi received one response from Wilton Rancheria via email on October 10, 2019 which included several proposed mitigation measures.

Proposed Mitigation Measures from Wilton Rancheria:

Proposed Wilton Rancheria Tribal Cultural Resource Avoidance Mitigation Measure:

- Planning construction to avoid tribal cultural resources, archaeological sites and/ or other resources; incorporating sites within parks, green-space or other open space; covering archaeological sites; deeding a site to a permanent conservation easement; or other preservation and protection methods agreeable to consulting parties and regulatory authorities with jurisdiction over the activity. Recommendations for avoidance of cultural resources will be reviewed by the CEQA lead agency representative, interested Native American Tribes and the appropriate agencies, in light of factors such as costs, logistics, feasibility, design, technology and social, cultural and environmental considerations, and the extent to which avoidance is consistent with project objectives. Avoidance and design alternatives may include realignment within the project area to avoid cultural resources, modification of the design to eliminate or reduce impacts to cultural resources or modification or realignment to avoid highly significant features within a cultural resource. Native American Representatives from interested Native American Tribes will be allowed to review and comment on these analyses and shall have the opportunity to meet with the CEQA lead agency representative and its representatives who have technical expertise to identify and recommend feasible avoidance and design alternatives, so that appropriate and feasible avoidance and design alternatives can be identified.
- If the resource can be avoided, the construction contractor(s), with paid Native American monitors from culturally affiliated Native American Tribes present, will install protective fencing outside the site boundary, including a buffer area, before construction restarts. The construction contractor(s) will maintain the protective fencing throughout construction to avoid the site during all remaining phases of construction. The area will be demarcated as an “Environmentally Sensitive Area”. Native American representatives from interested Native American Tribes and the CEQA lead agency representative will also consult to develop measures for long term management of the resource and routine operation and maintenance within culturally sensitive areas that retain resource integrity, including tribal cultural integrity, and including archaeological material, Traditional Cultural Properties and cultural landscapes, in accordance with state and federal guidance including National Register Bulletin 30 (Guidelines for Evaluating and Documenting Rural Historic Landscapes), Bulletin 36 (Guidelines for Evaluating and Registering Archaeological Properties), and Bulletin 38 (Guidelines for Evaluating and Documenting Traditional Cultural Properties); National Park Service Preservation Brief 36 (Protecting Cultural Landscapes: Planning, Treatment and Management of Historic Landscapes) and using the Advisory Council on Historic Preservation (ACHP) Native American Traditional Cultural Landscapes Action Plan for further guidance. Use of temporary and permanent forms of protective fencing will be determined

in consultation with Native American representatives from interested Native American Tribes.

As discussed in Section 6, no known cultural resources are noted in the project area and previous ground disturbance work has occurred in the proposed project area for construction of the Prop 84 Ponds previously subject to CEQA. The avoidance mitigation measures proposed by Wilton Rancheria are noted for the record. However, Mitigation Measures CR-1 and CR-2 are considered sufficient mitigation for the potential for impact to unidentified cultural resources, in the event that archaeological or paleontological resources are observed during Project construction-related activities, **Mitigation Measure CR-1** is in place to reduce impacts to a less than significant level.

Proposed Wilton Rancheria Native American Monitoring Mitigation Measure:

To minimize the potential for destruction of or damage to existing or previously undiscovered burials, archaeological and tribal cultural resources and to identify any such resources at the earliest possible time during project-related earthmoving activities, THE PROJECT PROPONENT and its construction contractor(s) will implement the following procedures:

- Paid Native American monitors from culturally affiliated Native American Tribes will be invited to monitor the vegetation grubbing, stripping, grading or other ground-disturbing activities in the project area to determine the presence or absence of any cultural resources. Native American representatives from cultural affiliated Native American Tribes act as a representative of their Tribal government and shall be consulted before any cultural studies or ground-disturbing activities begin.
- Native American representatives and Native American monitors have the authority to identify sites or objects of significance to Native Americans and to request that work be stopped, diverted or slowed if such sites or objects are identified within the direct impact area. Only a Native American representative can recommend appropriate treatment of such sites or objects.
- If buried cultural resources, such as chipped or ground stone, historic debris, building foundations, or bone, are discovered during ground-disturbing activities, work will stop in that area and within 100 feet of the find until an archaeologist who meets the Secretary of the Interior's qualification standards can assess the significance of the find and, if necessary, develop appropriate treatment measures in consultation with the Caltrans, the SHPO, and other appropriate agencies. Appropriate treatment measures may include development of avoidance or protection methods, archaeological excavations to recover important information about the resource, research, or other actions determined during consultation.
- In accordance with the California Health and Safety Code, if human remains are uncovered during ground disturbing activities, the construction contractor or the County, or both, shall immediately halt potentially damaging excavation in the area of the burial and notify the County coroner and a qualified professional archaeologist to determine the nature of the remains. The coroner shall examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or state

lands, in accordance with Section 7050(b) of the Health and Safety Code. If the coroner determines that the remains are those of a Native American, he or she shall contact the NAHC by phone within 24 hours of making that determination (Health and Safety Code Section 7050[c]). After the coroner's findings are presented, the County, the archaeologist, and the NAHC-designated Most Likely Descendant (MLD) shall determine the ultimate treatment and disposition of the remains and take appropriate steps to ensure that additional human interments are not disturbed.

As discussed in Section 6, no known cultural resources are noted in the project area and previous ground disturbance work has occurred in the proposed project area for construction of the Prop 84 Ponds previously subject to CEQA. However, a significant impact may occur if grading or excavation activities associated with the proposed Project would disturb previously interred human remains. Implementation of **Mitigation Measure CR-3** would ensure that human remains encountered during Project activities are treated in a manner consistent with state law and reduce impacts to human remains to a less than significant level as required by CEQA. This would occur through the respectful coordination with descendant communities to ensure that the traditional and cultural values of said community are incorporated in the decision-making process concerning the disposition of human remains that cannot be avoided. The implementation of these mitigation measures would reduce this potential impact to a less than significant level.

Proposed Wilton Rancheria Tribal Cultural Inadvertent Discoveries Mitigation Measure:

Develop a standard operating procedure, points of contact, timeline and schedule for the project so all possible damages can be avoided or alternatives and cumulative impacts properly accessed.

If potential tribal cultural resources, archaeological resources, other cultural resources, articulated, or disarticulated human remains are discovered by Native American Representatives or Monitors from interested Native American Tribes, qualified cultural resources specialists or other Project personnel during construction activities, work will cease in the immediate vicinity of the find (based on the apparent distribution of cultural resources), whether or not a Native American Monitor from an interested Native American Tribe is present. A qualified cultural resources specialist and Native American Representatives and Monitors from culturally affiliated Native American Tribes will assess the significance of the find and make recommendations for further evaluation and treatment as necessary. These recommendations will be documented in the project record. For any recommendations made by interested Native American Tribes which are not implemented, a justification for why the recommendation was not followed will be provided in the project record.

As discussed in Section 6, no known cultural resources are noted in the project area and previous ground disturbance work has occurred in the proposed project area for construction of the Prop 84 Ponds previously subject to CEQA. However, a significant impact may occur if potential tribal cultural resources, archaeological resources, other cultural resources, articulated, or disarticulated human remains are discovered. Implementation of **Mitigation Measure CR-1, CR-2, and CR-3** would ensure that potential tribal cultural resources, archaeological resources, other cultural resources, articulated, or disarticulated human remains are treated in a manner consistent with state law and reduce impacts to human remains to a less than significant level as required by CEQA. This would occur through the

respectful coordination with descendant communities. If adverse impacts to cultural resources, unique archeology, or other cultural resources occurs, then consultation with descendant communities, including consultation with Wilton Rancheria, regarding mitigation contained in the Public Resources Code sections 21084.3(a) and (b) and CEQA Guidelines section 15370 will occur. The implementation of these mitigation measures would reduce this potential impact to a less than significant level.

Proposed Wilton Rancheria Awareness Training Mitigation Measure:

Wilton Rancheria proposes to have a consultant and construction worker tribal cultural resources awareness brochure and training program for all personnel involved in project implementation will be developed in coordination with interested Native American Tribes. The brochure will be distributed, and the training will be conducted in coordination with qualified cultural resources specialists and Native American Representatives and Monitors from culturally affiliated Native American Tribes before any stages of project implementation and construction activities begin on the project site. The program will include relevant information regarding sensitive tribal cultural resources, including applicable regulations, protocols for avoidance, and consequences of violating State laws and regulations. The worker cultural resources awareness program will also describe appropriate avoidance and minimization measures for resources that have the potential to be located on the project site and will outline what to do and whom to contact if any potential archaeological resources or artifacts are encountered. The program will also underscore the requirement for confidentiality and culturally appropriate treatment of any findings of significance to Native Americans and behaviors, consistent with Native American Tribal values.

As discussed in Section 6, no known cultural resources are noted in the project area and previous ground disturbance work has occurred in the proposed project area for construction of the Prop 84 Ponds previously subject to CEQA. However, a significant impact may occur if potential tribal cultural resources, archaeological resources, other cultural resources, articulated, or disarticulated human remains are discovered. Implementation of **Mitigation Measure CR-1, CR-2, and CR-3** will be incorporated into the project's M and the City of Lodi will have a Monitoring and Reporting Plan to ensure the mitigation measures are outlined and followed.

XIX. Utilities and Service Systems

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's Projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes, and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The City of Lodi's wastewater treatment facility at White Slough receives and treats municipal and wastewater for the City of Lodi. The White Slough WPCF additionally receives and treats separate industrial process wastewater collection for several industries within the City, as well as storm water from some industrial areas within the City and the agricultural fields surrounding the WPCF. The City of Lodi's WPCF includes primary and secondary treatment and chlorine disinfection. Secondary treated effluent is applied to City-owned agricultural land surrounding the treatment facility during summer months. The City has recently constructed improvements necessary to capture and store tertiary treated water which has decreased the discharge to the Delta and the need for groundwater pumping for irrigation.

The WPCF facility is projected to treat from 5.5 million gallons a day (MGD) to 8.5 MGD of wastewater discharge. The Facility underwent an expansion to handle 5.8 million gallons of wastewater discharge per day in 1976 and again in 1990 to handle the projected 8.5 million gallons per day.

- a) **Less Than Significant Impact.** The proposed Project is for the construction of a new Police Training Facility firing range. There will be a small portable restroom, a small portable classroom, and some night lighting; no relocation or construction of any major utilities or service systems is required. A Stormwater Pollution Prevention Plan (SWPPP) an Erosion and Sediment Control Plan, and a Lead Management Plan (including drainage swales) will be prepared and implemented to avoid and minimize impacts on water quality during construction and operations. Best management practices (BMPs) for erosion

control will be implemented to avoid and minimize impacts on the environment during construction. This is considered a less than significant impact.

- b) **Less Than Significant Impact.** The proposed project will require some potable water demand for the training facilities portable restroom, landscaping, and training facility members/ employees. Although there would be a slight increase in the demand for potable water at the site, the demand is considered less than significant.
- c) **Less Than Significant Impact.** The proposed Project does not result in significant increased demand that would exceed wastewater treatment requirements. The WPCF facility is projected to treat from 5.5 million gallons a day (MGD) to 8.5 MGD of wastewater discharge. The proposed project would likely utilize a portable restroom trailer with approximately six toilets, four sinks, and three wall urinals. This is not considered a significant impact.
- d,e) **Less Than Significant Impact.** Construction or long-term operation of the proposed Police Training Facility Project would not require the development of a new landfill facility. Waste from construction and operation of the Project, anticipated to be minimal, would be disposed of at the North County Recycling Center & Sanitary Landfill located on Harney Lane. The closure date for the North County Recycling Center & Sanitary Landfill is expected 2046.

Periodic lead removal activities will be scheduled for the site and conducted per Best Management Practice recommendations. Lead reclamation specialists will be utilized for the removal and recycling of lead accumulated over time at the shooting range. There is no conflict with federal, state or local regulations. This is a less than significant impact.

XX. Wildfire

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

a-d) **No Impact.** The site is located on flat land adjacent the San Joaquin Delta surrounded primarily by agricultural use and would not expose people or structures to significant risks pertaining to wildfire. No new infrastructure is needed to install or maintain the Lodi Police Training Facility that will exacerbate wildfire risk.

XXI. Mandatory Findings of Significance

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Does the Project have the potential to substantially 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, substantially 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) **Less than Significant with Mitigation Incorporated.** As discussed in Section 4, *Biological Resources* and Section 5, *Cultural Resources*, the Project does not have the potential to substantially reduce habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. The project will participate in the San Joaquin County Multi-species Habitat Conservation Plan, this will involve payment of fees and implementation of standard Take Avoidance measures outlined in the Habitat Conservation Plan. The project will not directly impact the built environment cultural resources identified near the proposed project and no archaeological resources were identified within the Project Area. In the event that archaeological resources are observed during Project construction-related activities, Mitigation Measure CR-1 is in place to reduce impacts to a less than significant level.

The project site consists of disturbed former agricultural fields. The Project does not contain any design feature that would directly reduce habitat, reduce wildlife populations, threaten animal or plant community restrict the range of species, or eliminate examples of history or prehistory.

- b) **Less than Significant Impact.** Cumulative impacts are defined as two or more individual effects that, when considered together, are considerable or that compound or increase other environmental impacts. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the development when added to the impacts of other closely related past, present, and reasonably foreseeable or probable future developments. Cumulative impacts can result from individually minor, but collectively significant, developments taking place over a period.

By developing the proposed Police Training Facility, there would no longer be a need for the training participants to travel to further training locations, therefore the cumulative greenhouse gas emissions would be less than significant. The project operational emissions are considered conservative. This is a less than significant impact.

- c) **Less than Significant Impact with Mitigation Incorporated.** As discussed in Section 3, Air Quality; Section 4, Greenhouse Gas Emissions; Section 7, Geology and Soils; Section 8, Hazards and Hazardous Materials; Section 9, Hydrology and Water Quality; Section 12, Noise; and Section 16, Transportation, the proposed project would not create environmental effects that would adversely affect human beings, and would be less than significant with mitigation incorporated.

13. SUMMARY OF MITIGATION MEASURES

This section represents the required mitigation measures identified in Section 12.0 Environmental Checklist. Implementation of these mitigation measures would reduce all impacts of the proposed project to a less than significant level. The City of Lodi has committed to implementing all required mitigation measures.

AIR QUALITY

Air Quality Mitigation 1

The City of Lodi shall not begin construction activities until first securing appropriate permits from the San Joaquin Valley Air Control District.

Air Quality Mitigation 2: Construction of the proposed Project shall comply with all the applicable regulations specified in the San Joaquin Valley Air Pollution Control District Regulation VIII (Fugitive Dust Rules). The following procedures will be adhered to by the construction contractor(s) in accordance with Regulation VIII practices:

- Visible Dust Emissions (VDE) from construction, demolition, excavation or other earthmoving activities related to the Project shall be limited to 20% opacity or less, as defined in Rule 8011.
- Pre-water all land clearing, grubbing, scraping, excavation, land leveling, grading, cut and fill, and phase earthmoving.
- Apply water, chemical/organic stabilizer/suppressant, or vegetative ground cover to all disturbed areas, including unpaved roads.
- Restrict vehicular access to the disturbance area during periods of inactivity.
- Apply water or chemical/organic stabilizers/suppressants, construct wind barriers and/or cover exposed potentially dust-generating materials.
- When materials are transported off-site, stabilize and cover all materials to be transported and maintain six inches of freeboard (i.e., minimum vertical distance between the top of the load and the top of the trailer) space from the top of the container.
- Remove carryout and trackout of soil materials on a daily basis unless it extends more than 50 feet from site; carryout and trackout extending more than 50 feet from the site shall be removed immediately. The use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions. Use of blower devices is expressly forbidden. If the Project would involve more than 150 construction vehicle trips per day onto the public street, additional restrictions specified in Section 5.8 of Rule 8041 shall apply.
- Traffic speeds on unpaved roads shall be limited to 15 mph.

- During construction, all earth moving activities shall cease during periods of high winds (i.e., greater than 30 mph). To assure compliance with this measure, grading activities are subject to periodic inspections by the City of Lodi staff.
- Construction equipment shall be kept in proper operating condition, including proper engine tuning and exhaust control systems.
- Areas following clearing, grubbing and/or grading shall receive appropriate BMP treatments (e.g., re-vegetation, mulching, covering with tarps, etc.) to prevent fugitive dust generation.
- All exposed soil or material stockpiles that will not be used within 3 days shall be enclosed, covered, or watered twice daily, or shall be stabilized with approved nontoxic chemical soil binders at a rate to be determined by the on-site construction supervisor.
- Unpaved access roads shall be stabilized via frequent watering, non-toxic chemical stabilization, temporary paving, or equivalent measures at a rate to be determined by the on-site construction supervisor.
- Trucks transporting materials to and from the site shall allow for at least two feet of freeboard. Alternatively, trucks transporting materials shall be covered.
- Where visible soil material is tracked onto adjacent public paved roads, the paved roads shall be swept, and debris shall be returned to the construction site or transported off site for disposal.
- Wheel washers, dirt knock-off grates/mats, or equivalent measures shall be installed within the construction site where vehicles exit unpaved roads onto paved roads.
- Diesel powered construction equipment shall be maintained in accordance with manufacturer's requirements and shall be retrofitted with diesel particulate filters where available and practicable.
- Heavy duty diesel trucks and gasoline powered equipment shall be turned off if idling is anticipated to last for more than 5 minutes.
- Where feasible, the construction contractor shall use alternatively fueled construction equipment, such as electric or natural gas-powered equipment or biofuel.
- Heavy construction equipment shall use low NOx diesel fuel to the extent that it is readily available at the time of construction.
- The construction contractor shall maintain signage along the construction perimeter with the name and telephone number of the individual in charge of implementing the construction emissions mitigation plan, and with the telephone number of the SJVAPCD's complaint line. The contractor's representative shall maintain a log of any public complaints and corrective actions taken to resolve complaints.
- During grading and site preparation activities, exposed soil areas shall be stabilized via frequent watering, non-toxic chemical stabilization, or equivalent measures at a rate to be determined by the on-site construction supervisor.
- During windy days when fugitive dust can be observed leaving the construction site, additional applications of water shall be required at a rate to be determined by the onsite construction supervisor.

BIOLOGICAL RESOURCES

Biological Resources Mitigation Measure 1

The Project shall participate in the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan. The Project shall coordinate with San Joaquin Council of Governments (555 E. Weber Avenue, Stockton, CA 95202), prior to any site disturbance activities. The project site was addressed in the previous Proposition 84 Ponds project and biological impacts associated with development of the project site have been mitigated through the SJMSCP. Standard Incidental Take Minimization Measures (ITMMs) of the SJMSCP will apply to the project.

Biological Resources Mitigation Measure 2 - Preconstruction Survey Requirement

A qualified biologist shall conduct a preconstruction clearance survey for special-status species and migratory birds in all potential habitats throughout the project area; thus, any action that disrupts surface soils (e.g., clearing and grubbing, rough grading, excavation, compaction for temporary staging areas or permanent construction sites) shall be subject to a preconstruction survey. Surveys shall be undertaken not more than 30 days prior to ground disturbing activity to ensure avoidance during construction. All areas within 250 feet of the project area shall be surveyed where site access and visibility allow. If no special-status species or migratory birds are present, further mitigation is not necessary. If any special-status species and/or migratory birds are found nesting on-site, the biologist shall implement protective measures to ensure that animals are not adversely affected, and construction does not commence until the biologist has determined no harm would result to breeding animals as a result of construction. Written results of the preconstruction survey shall be submitted to the City of Lodi and San Joaquin County Council of Governments Habitat Conservation Program.

CULTURAL RESOURCES

Cultural Resources Mitigation Measure 1

If prehistoric or historic-period archaeological deposits are discovered during Project activities, all work within 25 feet of the discovery should be redirected and the archaeologist should assess the situation, consult with agencies as appropriate, and make recommendations regarding the treatment of the discovery. Impacts to archaeological deposits should be avoided by Project activities, but if such impacts cannot be avoided, the deposits should be evaluated for their California Register eligibility. If the deposits are not California Register-eligible, no further protection of the finds is necessary. If the deposits are California Register-eligible, they should be protected from Project-related impacts, or such impacts should be mitigated. Mitigation may consist of, but is not necessarily limited to, systematic recovery and analysis of archaeological deposits, recording the resource, preparation of a report of findings, and accessioning recovered archaeological materials at an appropriate curation facility. Public educational outreach may also be appropriate.

Cultural Resources Mitigation Measure 2

Should paleontological resources be identified on the Project site during any ground disturbing activities related to the Project, all ground disturbing activities within 100 feet of the discovery shall cease and the City of Lodi shall be notified within 24 hours of the discovery. The Project applicant shall retain a qualified paleontologist to provide an evaluation of the find and to prescribe mitigation measures to reduce impacts to a less

than significant level. In considering any suggested mitigation proposed by the consulting paleontologist, the Project applicant shall determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, Project design, costs, specific plan policies and land use assumptions, and other considerations. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery) shall be instituted. Work may proceed on other parts of the project site while mitigation for paleontological resources is carried out.

Cultural Resources Mitigation Measure 3

Any human remains encountered during Project ground-disturbing activities should be treated in accordance with California Health and Safety Code Section 7050.5. The lead agency should inform its contractor(s) of the sensitivity of the Direct Area of Potential Effect for human remains and verify that the following directive has been included in the appropriate contract documents:

If human remains are encountered during Project activities, the Project shall comply with the requirements of California Health and Safety Code Section 7050.5. There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the county coroner has determined the manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation or to his or her authorized representative. At the same time, an archaeologist shall be contacted to assess the situation and consult with agencies as appropriate. Project personnel/ construction workers shall not collect or move any human remains and associated materials. If the human remains are of Native American origin, the coroner must notify the Native American Heritage Commission within 24 hours of this identification. The Native American Heritage Commission will identify a Native American Most Likely Descendant to inspect the site and provide recommendations for the proper treatment of the remains and associated grave goods.

HAZARDS AND HAZARDOUS MATERIALS

Hazards and Hazardous Materials Mitigation 1

Spill Prevention and Control Measures will be implemented and include the following:

- Any fuel products, lubricating fluids, grease, or other products and/or waste released from the Contractor(s) vehicles, equipment, or operations, shall be collected and disposed of immediately, and in accordance with State, Federal, and local laws.
- Spill clean-up materials will be stored near potential spill areas (such as vehicle and equipment staging areas).
- Spill kits will include sorbent material (such as pads designed for oil and gas), socks and/or pads to prevent spread of hazardous material, and containers for storing and proper disposal.
- Employees and contractor(s) will be trained on proper hazardous spill clean-up practices.

Hazards and Hazardous Materials Mitigation 2

A site-specific Lead Hazard Management Plan will be developed for the Police Training Facility. Best Management Practices will consist of environmentally protective, site-specific lead management techniques to address (1) lead bullet control and containment, (2) prevention of lead migration to subsurface and surrounding surface water bodies and (3) lead removal and recycling. The lead hazard management plan will require comprehensive record keeping and documentation.

Hazards and Hazardous Materials Mitigation Measure 3

The Lodi Police Training Facility will notify Kingdon Airport prior to detonating any explosives that may cause large plumes of smoke, dust, or debris.

14. DOCUMENTS REFERENCED

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15. REPORT PREPARTION

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