

INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

[Pursuant to Public Resources Code Section 21080(c) and California Code of Regulations, Title 14, Sections 15070-15071]

LEAD AGENCY: San Joaquin County Community Development Department

PROJECT APPLICANT: PDK Hospitality LLC

PROJECT TITLE/FILE NUMBER(S): PA-2200142 (SA)

PROJECT DESCRIPTION: This project is a Site Approval for a hotel. This project will include a 3-story; 38,595-square-foot building, and a 575 square foot storage shed. The project site lies within the service boundary of CSA-31 for water, sewer, and storm drainage. This parcel is not under a Williamson Act Contract. (Use Type: Transient Lodging-Hotel and Motel)

PROJECT LOCATION: On the south side of West Banner Street, 575 feet east of North Thornton Road, Lodi

ASSESSOR PARCEL NO.: 055-320-66

ACRES: 2.71-acres

GENERAL PLAN: C/FS (Freeway Services Commercial)

ZONING: C-FS (Freeway Services Commercial)

POTENTIAL POPULATION, NUMBER OF DWELLING UNITS, OR SQUARE FOOTAGE OF USE(S):
Three-story hotel totaling 38,595 square foot, 575 square foot storage shed.

SURROUNDING LAND USES:

NORTH: Commercial/Agricultural

SOUTH: Commercial

EAST: Commercial

WEST: Commercial

REFERENCES AND SOURCES FOR DETERMINING ENVIRONMENTAL IMPACTS:

Original source materials and maps on file in the Community Development Department including: all County and City general plans and community plans; assessor parcel books; various local and FEMA flood zone maps; service district maps; maps of geologic instability; maps and reports on endangered species such as the Natural Diversity Data Base; noise contour maps; specific roadway plans; maps and/or records of archeological/historic resources; soil reports and maps; etc.

Many of these original source materials have been collected from other public agencies or from previously prepared EIR's and other technical studies. Additional standard sources which should be specifically cited below include on-site visits by staff (Air Impact Assessment from San Joaquin Valley Air Pollution Control District dated November 1, 2022, Vehicle Miles Traveled (VMT) Memorandum by Fehr & Peers dated March 21, 2023) Copies of these reports can be found by contacting the Community Development Department.

TRIBAL CULTURAL RESOURCES:

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.

No

GENERAL CONSIDERATIONS:

1. Does it appear that any environmental feature of the project will generate significant public concern or controversy?

Yes No

Nature of concern(s): Enter concern(s).

2. Will the project require approval or permits by agencies other than the County?

Yes No

Agency name(s): APCD

3. Is the project within the Sphere of Influence, or within two miles, of any city?

Yes No

City: Lodi

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION: (To be completed by the Lead Agency) On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (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.


Giuseppe Sanfilippo
Associate Planner

4-13-2023
Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a) the significance criteria or threshold, if any, used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significance.

Issues:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Analyzed In The Prior EIR
<u>I. AESTHETICS.</u>					
Except as provided in Public Resources Code Section 21099, would the project:					
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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"/>	<input type="checkbox"/>
c) In non-urbanized areas, 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 publically 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 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact Discussion:

a-d) This project is a Site Approval for a 3-story 38,595-square-foot hotel and a 575 square foot storage shed. The project site is not located along a scenic vista route, and the surrounding area is a mixture of commercial uses. The project site is not located along a designated scenic route pursuant to 2035 General Plan Figure 12-2, and the surrounding area is a mixture of industrial, and agricultural with scattered residences. The project will be subject to all Development Title requirements regarding building heights, setbacks, site lighting, and signs. As a result, the proposed project is not anticipated to have an impact on aesthetics.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Analyzed In The Prior EIR
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II. AGRICULTURE AND FORESTRY RESOURCES.

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. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. -- Would the project:

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|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|--------------------------|
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Result in the 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"/> | <input 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 or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Impact Discussion:

a-e) This project is a Site Approval for a 3-story 38,595-square-foot hotel and a 575 square foot storage shed. The project will be served by County Service Area 31 for water, wastewater, and storm drainage. The proposed project is within an established commercial area and is not anticipated to impact properties under a Williamson Act contract. Additionally, the nearest property under a Williamson Act contract is approximately 300 feet north of the project site. As a result, the proposed project will have a less than significant impact to surrounding agricultural operations and will not create premature development pressure on surrounding agricultural lands to convert land from agricultural uses to non-agricultural uses.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Analyzed In The Prior EIR
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III. AIR QUALITY.

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

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"/>	<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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in substantial 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"/>	<input type="checkbox"/>

Impact Discussion:

(a-d) This project is a Site Approval for a 3-story 38,595-square-foot hotel and a 575 square foot storage shed. The San Joaquin Valley Unified Air Pollution Control District (SJVAPCD) has been established by the State in an effort to control and minimize air pollution. On November 1, 2022, the SJVAPCD issued the final Air Impact Assessment (AIA) approval for the project. The SJVAPCD determined that the construction and operation for the project will be less than two-tons of NOx per year, and two tons PM10 per year. The SJVAPCD provided the following mitigation measures:

- For each project phase, within 30-days of issuance of the first certificate of occupancy, if applicable, submit to the District a summary report of the construction start, and end dates, and the date of issuance of the first certificate of occupancy. Otherwise, submit to the District a summary report of the construction start and end dates within 30 days of the end of each phase of construction.
- For each project phase, all records shall be maintained on site during construction and for a period of ten years following either the end of construction or the issuance of the first certificate of occupancy, whichever is later. Records shall be made available for District inspection upon request.
- For each project phase, maintain records of (1) the construction start and end dates and (2) the date of issuance of the first certificate of occupancy, if applicable.
- Improve predestrial network within project site and connecting off-site

In addition to these measures, the project will be required to file a Dust Control Plan prior to commencing any earth moving activities and obtain an Authority to Construct prior to the installation of equipment that controls or may emit air contaminants, including but not limited to emergency internal combustion engines, boilers, and bag houses. As a result, air impacts are anticipated to be less than significant.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Analyzed In The Prior EIR
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IV. BIOLOGICAL RESOURCES:

Would the project:

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|--|--------------------------|--------------------------|-------------------------------------|--------------------------|--------------------------|
| 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 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 US Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input 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"/> | <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 native wildlife nursery sites? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input 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"/> | <input type="checkbox"/> |
| f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Impact Discussion:

- a) This project is a Site Approval for a 3-story 38,595-square-foot hotel and a 575 square foot storage shed. The Natural Diversity Database lists the Swainson's hawk (*Buteo swainsoni*), the rose-mallow (*Hibiscus lasiocarpus*), the California black rail (*Laterallus jamaicensis contorniculus*), the giant garter snake (*Thamnophis gigas*), and the vernal pool tadpole shrimp (*Lepidurus packardii*) as rare, endangered, or threatened species as potentially occurring in or near the site. The project would be subject to the San Joaquin Council of Governments (SJCOG) for review and be required to participate in the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP). The applicant has confirmed participation in the plan, which will address any potential impacts to rare, endangered or threatened species, or habitat located on or near the site. Pursuant to the Final EIR/EIS for the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP), dated November 15, 2000, and certified by the San Joaquin Council of Governments on December 7, 2000.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Analyzed In The Prior EIR
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V. CULTURAL RESOURCES.

Would the project:

- | | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 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"/> | <input checked="" 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"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Disturb any human remains, including those interred outside of dedicated cemeteries? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Impact Discussion:

- a-c) This project is a Site Approval for a 3-story 38,595-square-foot hotel and a 575 square foot storage shed. No impact on cultural resources is anticipated. Should human remains be discovered during any ground disturbing activities, all work shall stop immediately in the vicinity (e.g. 100 feet) of the finds until they can be verified. The County coroner shall be immediately contacted in accordance with Health and Safety Code section 7050.5(b). Protocol and requirements outlined in Health and Safety Code Sections 7050.5(b) and 7050.5(c), as well as Public Resources Code Section 5097.98, shall be followed.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Analyzed In The Prior EIR
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VI. ENERGY.

Would the project:

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|--|--------------------------|--------------------------|-------------------------------------|--------------------------|--------------------------|
| a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input 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"/> | <input type="checkbox"/> |

Impact Discussion:

- a,b) This project is a Site Approval for a 3-story 38,595-square-foot hotel and a 575 square foot storage shed. The California Energy Code (also titled The Energy Efficiency Standards for Residential and Non-residential Buildings) was created by the California Building Standards Commission in response to a legislative mandate to reduce California's energy consumption. The code's purpose is to advance the state's energy policy, develop renewable energy sources and prepare for energy emergencies. These standards are updated periodically by the California Energy Commission. The code includes energy conservation standards applicable to most buildings throughout California. These requirements will be applicable to ensure that any impacts to the environment due to wasteful, inefficient, or unnecessary consumption of energy will be reduced to less than significant and help to prevent any conflict with state or local plans for energy efficiency and renewable energy.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Analyzed In The Prior EIR
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VII. GEOLOGY AND SOILS.

Would the project:

- | | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|--------------------------|
| a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ii) Strong seismic ground shaking? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| iii) Seismic-related ground failure, including liquefaction? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| iv) Landslides? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 checked="" 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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Be located on expansive soil and create direct or indirect risks to life or property? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Impact Discussion:

- (a-f) This project is a Site Approval for a 3-story 38,595-square-foot hotel and a 575 square foot storage shed. The project site is in an area of expansive soil, with a soil expansive potential of low. At the time of future development, the Building Division will require a soils report to be submitted with a Building Permit application to determine the appropriate construction of the building. Therefore, the effects of expansive soil to the underlying project are expected to be less than significant.

The proposed project will not cause the risk of injury or death as a result of a rupture of a known earthquake fault, seismic activity, or landslides because there are no faults located near the project site, and the site is relatively flat. The proposed project will not result in substantial soil erosion or the loss of topsoil. The proposed project will not destroy a unique paleontological resource or site or unique geological feature. The proposed project is not 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.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Analyzed In The Prior EIR
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VIII. GREENHOUSE GAS EMISSIONS.

Would the project:

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"/>	<input type="checkbox"/>
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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"/>	<input type="checkbox"/>
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Impact Discussion:

a-b) This project is a Site Approval for a 3-story 38,595-square-foot hotel and a 575 square foot storage shed. Emissions of GHG's contributing to global climate change are attributable in large part to human activities associated with the industrial/manufacturing, utility, transportation, residential, and agricultural sectors. Therefore, the cumulative global emissions of GHGs contributing to global climate change can be attributed to every nation, region, and city, and virtually every individual on earth. An individual project's GHG emissions are at a micro-scale level relative to global emissions and effects to global climate change; however, an individual project could result in a cumulatively considerable incremental contribution to a significant cumulative macro-scale impact. As such, impacts related to emissions of GHG are inherently considered cumulative impacts.

Estimated GHG emissions attributable to future development would be primarily associated with increases of carbon dioxide (CO₂) and, to a lesser extent, other GHG pollutants, such as methane (CH₄) and nitrous oxide (N₂O) associated with area sources, mobile sources or vehicles, utilities (electricity and natural gas), water usage, wastewater generation, and the generation of solid waste. The primary source of GHG emissions for the project would be mobile source emissions. The common unit of measurement for GHG is expressed in terms of annual metric tons of CO₂ equivalents (MTCO₂e/yr).

The SJVAPCD has adopted the *Guidance for Valley Land- use Agencies in Addressing GHG Emission Impacts for New Projects under CEQA* and the *District Policy – Addressing GHG Emission Impacts for Stationary Source Projects Under CEQA When Serving as the Lead Agency*.¹ The guidance and policy rely on the use of performance-based standards, otherwise known as Best Performance Standards (BPS) to assess significance of project specific greenhouse gas emissions on global climate change during the environmental review process, as required by CEQA. To be determined to have a less-than-significant individual and cumulative impact with regard to GHG emissions, projects must include BPS sufficient to reduce GHG emissions by 29 percent when compared to Business As Usual (BAU) GHG emissions. Per the SJVAPCD, BAU is defined as projected emissions for the 2002-2004 baseline period. Projects which do not achieve a 29 percent reduction from BAU levels with BPS alone are required to quantify additional project-specific reductions demonstrating a combined reduction of 29 percent. Potential mitigation measures may include, but not limited to: on-site renewable energy (e.g. solar photovoltaic systems), electric vehicle charging stations, the use of alternative-fueled vehicles, exceeding Title 24 energy efficiency standards, the installation of energy-efficient lighting and control systems, the installation of energy-efficient mechanical systems, the installation of drought-tolerant landscaping, efficient irrigation systems, and the use of low-flow plumbing fixtures.

It should be noted that neither the SJVAPCD nor the County provide project-level thresholds for construction-related GHG emissions. Construction GHG emissions are a one-time release and are, therefore, not typically expected to generate a significant contribution to global climate change.

¹ San Joaquin Valley Air Pollution Control District. *Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for New Projects under CEQA*. December 17, 2009. San Joaquin Valley Air Pollution Control District. *District Policy Addressing GHG Emission Impacts for Stationary Source Projects Under CEQA When Serving as the Lead Agency*. December 17, 2009.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Analyzed In The Prior EIR
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IX. HAZARDS AND HAZARDOUS MATERIALS.

Would the project:

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|--------------------------|
| 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 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 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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input 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 or excessive noise for people residing or working in the project area? | <input type="checkbox"/> | <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"/> | <input type="checkbox"/> |
| g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Impact Discussion:

- a-g) This project is a Site Approval for a 3-story 38,595-square-foot hotel and a 575 square foot storage shed. The project site is not 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 not create a significant hazard to the public or the environment. The proposed project would not result in, create or induce hazards and associated risks to the public. Construction activities related to development projects would be subject to federal, state, and local laws and requirements designed to minimize and avoid potential health and safety risks associated with hazardous materials. No significant impacts are anticipated related to the transport, use, or storage of hazardous materials during construction activities are anticipated.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Analyzed In The Prior EIR
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X. HYDROLOGY AND WATER QUALITY.

Would the project:

- | | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|--------------------------|
| 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"/> | <input checked="" 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"/> | <input checked="" 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"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| i) result in substantial erosion or siltation on- or off-site; | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 off-site; | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| iv) impede or redirect flood flows? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 checked="" 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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Impact Discussion:

- a-e) This project is a Site Approval for a 3-story 38,595-square-foot hotel and a 575 square foot storage shed. The project site is located in the Flood Zone X (500) flood designations. A referral was sent to the Department of Public Works Flood Control Division for comments. All new construction, at the time of development, will be subject to the rules and regulations of the Department of Public Works.

The project area is located approximately 2.0-miles north of White Slough. The proposed project will not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality, conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Analyzed In The Prior EIR
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XI. LAND USE AND PLANNING.

Would the project:

- | | | | | | |
|--|--------------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|
| a) Physically divide an established community? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input 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 an environmental effect? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Impact Discussion:

- a,b) This project is a Site Approval for a 3-story 38,595-square-foot hotel and a 575 square foot storage shed. The proposed project will have a less than significant impact to surrounding parcels and will not create premature development pressure on surrounding agricultural lands to convert land from agricultural uses to nonagricultural uses. Therefore, this project is not a growth-inducing action. The General Plan and Zoning designations of the project site will not change as a result of the project, and the Transient Lodging-Hotel and Motel use type is conditionally permitted in the C-FS (Freeway Services Commercial) zone subject to an approved Site Approval application. The proposed project will not set a significant land use precedent and is consistent with all applicable plans adopted by the County.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Analyzed In The Prior EIR
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XII. MINERAL RESOURCES.

Would the project:

- | | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|--------------------------|
| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Impact Discussion:

- a, b) The proposed project will not result in the loss of availability of a known mineral resource of a resource recovery site because the site does not contain minerals of significance or known mineral resources. San Joaquin County applies a mineral resource zone (MRZ) designation to land that meets the significant mineral deposits definition by the State Division of Mines and Geology. The project site is not in an area designated MRZ, and there is currently no mining activity in the area. The surrounding area is developed with various commercial uses. Therefore, the proposed project application will have less than a significant impact on the availability of mineral resources or mineral resource recovery sites within San Joaquin County.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Analyzed In The Prior EIR
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XIII. NOISE.

Would the project result in:

- | | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 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"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Generation of excessive groundborne vibration or groundborne noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) For a project 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"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Impact Discussion:

- a-c) This project is a Site Approval for a 3-story 38,595-square-foot hotel and a 575 square foot storage shed. The nearest single-family residence is located approximately 1,080 feet southeast of the project site Development Title Section 9-404.040 lists the Residential use type as a noise sensitive land use. Development Title Section Table 9-404.050 states that the maximum sound level for stationary noise sources during the daytime and nighttime and 65dB. This applies to outdoor activity areas of the receiving use or applies at the lot line if no activity area is known. Additionally, noise from construction activities are exempt from noise standards provided the construction occur no earlier than 6:00 A.M. and no later than 9:00 P.M. The proposed project would be subject to these Development Title standards. Therefore, noise impacts from the proposed project are expected to be less than significant.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Analyzed In The Prior EIR
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XIV. POPULATION AND HOUSING.

Would the project:

- | | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input 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"/> | <input type="checkbox"/> |

Impact Discussion:

- a-b) This project is a Site Approval for a 3-story 38,595-square-foot hotel and a 575 square foot storage shed. The nearest single-family residence is located approximately 1,080 feet southeast of the project site. The proposed project will not result in displacement of the population and affect the amount of proposed or existing housing in the vicinity. The project site is currently vacant, and no impacts to population and housing are anticipated if this application is approved.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Analyzed In The Prior EIR
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XV. PUBLIC SERVICES.

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

Fire protection?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Police protection?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Schools?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Parks?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Other public facilities?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Impact Discussion:

a) This project is a Site Approval for a 3-story 38,595-square-foot hotel and a 575 square foot storage shed. The existing fire protection is provided by the Woodbridge Fire District, existing law enforcement protection is provided by the San Joaquin County Sheriff's Department, and the existing school services are provided by the Lodi Unified School District. There are no parks in the vicinity, and none are required to be provided. Therefore, the project will not result in the need for additional fire protection, police protection, schools, parks, or other public facilities.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Analyzed In The Prior EIR
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XVI. RECREATION.

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"/>	<input type="checkbox"/>
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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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Impact Discussion:

a-b) The proposed project will not substantially increase the use of existing neighborhood and regional parks because no increase in housing or people is associated with this application. The proposed project will not substantially increase the use of existing neighborhood and regional parks because no increase in housing or people is associated with this application. Additionally, the project does not include recreation facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment. No impacts to recreation opportunities are anticipated.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Analyzed In The Prior EIR
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XVII. TRANSPORTATION.

Would the project:

- | | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|--------------------------|
| a) Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 checked="" 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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Result in inadequate emergency access? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Impact Discussion:

- a,c) This project is a Site Approval for a 3-story 38,595-square-foot hotel and a 575 square foot storage shed. The project was referred to the Department of Public Works on August 3, 2022, for review. A Vehicle Miles Traveled (VMT) Memorandum by Fehr & Peers dated March 21, 2023 was prepared for the project that concluded:

“Like locally-serving retail developments, hotel developments rarely generate new trips, rather, they often result in a redistribution of existing trips. Hotels are not typically a destination; they are merely a stop on the way to the final destination. For a hotel to generate new trips (and new VMT), it would need to include unique features that attract new visitors to the area (e.g., Great Wolf Lodge located in Manteca or Wine & Roses in Lodi). The proposed hotel does not include any unique features that would justify it serving as a final destination. Additionally, the project does not affect the local or regional population, disposable income for travel, or the attractiveness of local destinations. The project’s main effect is to increase hotel room supply creating more room choices for visitors.”

Retail and similar projects with less than 50,000 square feet of floor area are considered locally serving and are presumed to have a less than significant impact on VMT and are screened out from requiring a full VMT analysis. San Joaquin County has determined the project will generate less than 110 automobile trips per day and, therefore, is considered a small project according to the Technical Advisory on Evaluating Transportation Impacts in CEQA, as published by the California Office of Planning and Research (OPR) in December 2018. According to this OPR guidance, a small project that generates or attracts “fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact” with regards to VMT.

The project proposes an access driveway from West Banner Street and will utilize existing public roads. The project is not expected to conflict with any program plans, ordinances, or policies addressing the vehicle circulation system.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Analyzed In The Prior EIR
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XVIII. TRIBAL CULTURAL RESOURCES.

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, and that is:

- i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
- 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Discussion:

a) This project is a Site Approval for a 3-story 38,595-square-foot hotel and a 575 square foot storage shed. A referral was sent to the United Auburn Indian Community (UAIC), North Valley Yokuts Tribe, and the Buena Vista Rancheria for review.

If any suspected Tribal Cultural Resources (TCR) are discovered during ground disturbing construction activities, all work shall cease within 100 feet of the find. A Tribal Representative from culturally affiliated tribes shall be immediately notified and shall determine if the find is a TCR pursuant to Public Resources Code Section 21074. The Tribal Representative will make recommendations regarding the treatment of the discovery. Preservation in place is the preferred alternative under CEQA and UAIC protocols, and every effort must be made to preserve the resources in place, including through project redesign. Work at the discovery location cannot resume until all necessary investigation and evaluation of the discovery under the requirements of CEQA, including AB 52, has been satisfied. The contractor shall implement any measures deemed by the lead agency to be necessary and feasible to preserve in place, avoid, or minimize impacts to the resource, including but not limited to, facilitating the appropriate tribal treatment of the find, as necessary. This has been incorporated into the project's Conditions of Approval.

Additionally, should human remains be discovered during any ground disturbing activities, all work shall stop immediately in the vicinity (e.g., 100 feet) of the finds until they can be verified. The County coroner shall be immediately contacted in accordance with Health and Safety Code section 7050.5(b). Protocol and requirements outlined in Health and Safety Code sections 7050.5(b) and 7050.5(c) as well as Public Resources Code section 5097.98 shall be followed.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Analyzed In The Prior EIR
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XIX. UTILITIES AND SERVICE SYSTEMS.

Would the project:

- | | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|--------------------------|
| 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 or relocation of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input 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"/> | <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"/> | <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 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 type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Impact Discussion:

- a-c) This project is a Site Approval for a 3-story 38,595-square-foot hotel and a 575 square foot storage shed. The project will be served by the County Service Area 31 for water, sewer, and storm drainage. As a result, project impacts to utilities and service systems are anticipated to be less than significant.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Analyzed In The Prior EIR
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XX. WILDFIRE.

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

- | | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Substantially impair an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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"/> | <input checked="" 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"/> | <input checked="" 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"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Impact Discussion:

a-d) This project is a Site Approval for a 3-story 38,595-square-foot hotel and a 575 square foot storage shed. Pursuant to the San Joaquin Fire Severity Zone map, the project site is located in local responsibility fire zone designation. The project utilizes proposed roadway access in conformance with San Joaquin County and fire road standards. Therefore, the proposed project will have a less that significant impact wildfire hazards.

The project has access directly from West Banner Street and all access driveways will be required to meet any applicable San Joaquin County and California Fire Code standards. As a result, the proposed project will have a less than significant impact related to potential wildfire hazards and emergency response plans.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Analyzed In The Prior EIR
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XXI. MANDATORY FINDINGS OF SIGNIFICANCE

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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Impact Discussion:

a) This project is a Site Approval for a 3-story 38,595-square-foot hotel and a 575 square foot storage shed. The proposed application does not have the potential to degrade the environment or eliminate a plant or animal community, or eliminate important examples of major periods of California history or prehistory. The project would not result in significant cumulative impacts or cause substantial adverse effects on human beings, either directly or indirectly.



November 1, 2022

Planning Department
County Of San Joaquin
1810 East Hazelton Avenue
Stockton, CA 95205

Re: Air Impact Assessment (AIA) Application Approval
ISR Project Number: C-20220437
Land Use Agency: County of San Joaquin
Land Use Agency ID Number: Site Approval PA-2200142

To Whom It May Concern:

The San Joaquin Valley Air Pollution Control District (District) has approved the Air Impact Assessment (AIA) application for the Tru by Hilton- West Lodi project, located at 6125 W Banner Street in Lodi, California. The Project consists of a 4-story, 40,925 square foot, 81 room hotel. The District has determined that the mitigated baseline emissions for construction and operation will be less than two tons NOx per year and two tons PM10 per year. Pursuant to District Rule 9510 Section 4.3, this project is exempt from the requirements of Section 6.0 (General Mitigation Requirements) and Section 7.0 (Off-site Emission Reduction Fee Calculations and Fee Schedules) of the rule. As such, the District has determined that this project complies with the emission reduction requirements of District Rule 9510 and is not subject to payment of off-site fees.

Pursuant to District Rule 9510, Section 8.4, the District is providing you with the following information:

- A notification of AIA approval (this letter)
- A statement of tentative rule compliance (this letter)
- An approved Monitoring and Reporting Schedule
- A copy of the Air Impact Assessment Application

Certain emission mitigation measures proposed by the applicant may be subject to approval or enforcement by the County of San Joaquin. No provision of District Rule 9510 requires action on the part of the County of San Joaquin, however, please review the enclosed list of mitigation measures and notify the District if the proposed mitigation measures are

Samir Sheikh
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1890 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6081

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: (661) 392-5500 FAX: (661) 392-5585

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inconsistent with your agency's requirements for this project. The District can provide the detailed emissions analysis upon request.

If you have any questions, please contact Ms. Cherie A Clark by telephone at (559) 230-5940 or by email at cherie.clark@valleyair.org.

Sincerely,

Brian Clements
Director of Permit Services

A handwritten signature in black ink, appearing to read 'Brian Clements', with a stylized flourish at the end.

For Mark Montelongo
Program Manager

Enclosures

Indirect Source Review Complete Project Summary Sheet & Monitoring and Reporting Schedule

Project Name:	TRU BY HILTON- WEST LODI
Applicant Name:	PDK HOSPITALITY, LLC
Project Location:	6125 W BANNER STREET HIGHWAY 12 APN(s): 055-320-66
Project Description:	ACREAGE: 2.71
ISR Project ID Number:	C-20220437
Applicant ID Number:	C-303728
Permitting Public Agency:	COUNTY OF SAN JOAQUIN
Public Agency Permit No.	SITE APPROVAL PA-2200142

Existing Emission Reduction Measures

Enforcing Agency	Measure	Quantification	Notes
None - Existing Measure	Improve Walkability Design	54 Nodes/square mile	
None - Existing Measure	Improve Destination Accessibility	5.5 miles (distance to downtown or job center)	

Number of Existing Measures: 2

Non-District Enforced Emission Reduction Measures

Enforcing Agency	Measure	Specific Implementation	Source Of Requirements
STATE OF CALIFORNIA	Landscape equipment	3% Landscape Equipment electrically powered	State Building Code

Number of Non-District Enforced Measures: 1

District Enforced Emission Reduction Measures

Enforcing Agency	Measure	Specific Implementation	Measure For Compliance	District Review
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Indirect Source Review Complete Project Summary Sheet & Monitoring and Reporting Schedule

(District Enforced Emission Reduction Measures Continued)

Enforcing Agency	Measure	Specific Implementation	Measure For Compliance	District Review
SJVAPCD	Construction and Operation - Exempt from Off-site Fee	For each project phase, within 30-days of issuance of the first certificate of occupancy, if applicable, submit to the District a summary report of the construction start, and end dates, and the date of issuance of the first certificate of occupancy. Otherwise, submit to the District a summary report of the construction start and end dates within 30-days of the end of each phase of construction.	(Compliance Dept. Review)	
SJVAPCD	Construction and Operation - Recordkeeping	For each project phase, all records shall be maintained on site during construction and for a period of ten years following either the end of construction or the issuance of the first certificate of occupancy, whichever is later. Records shall be made available for District inspection upon request.	(Compliance Dept. Review)	
SJVAPCD	Construction and Operational Dates	For each project phase, maintain records of (1) the construction start and end dates and (2) the date of issuance of the first certificate of occupancy, if applicable.	(Compliance Dept. Review)	
SJVAPCD	Improve Pedestrian Network	Within Project Site and Connecting Off-Site	(Compliance Dept. Review)	

Number of District Enforced Measures: 4



San Joaquin Valley Air Pollution Control District

Indirect Source Review (ISR) - Air Impact Assessment (AIA)

Residential/Non-Residential/Mixed-Use Application Form



A. Applicant Information			
Applicant/Business Name: PDK Hospitality, LLC			
Mailing Address: 1707 W Fremont Street		City: Stockton	State: CA Zip: 95203
Contact: Jai Patel		Title:	
Is the Applicant a licensed state contractor? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes, please provide State License number:			
Phone: (209) 483-0450	Fax:	Email: jaipatel@yahoo.com	
B. Agent Information (if applicable): If an Agent is signing the Air Impact Assessment Application on behalf of the Applicant, a signed letter from the Applicant giving the Agent authorization is required.			
Agent/Business Name: RED Inc. Architects			
Mailing Address: 1217 J. Street		City: Modesto	State: CA Zip: 95354
Contact: David Burkett		Title: Principle Architect	
Phone: (209) 522-8900	Fax:	Email: david@redincarchitects.com	
C. Project Information			
Project Name: Tru by Hilton- West Lodi		Tract Number(s) (if known): 055-320-66	
Project Location	Street: 6125 W Banner Street	City: Lodi	Zip: 95242
Cross Streets: Highway 12		County: San Joaquin County	
Permitting Agency: San Joaquin County	Planner: Giuseppe Sanfilippo	Contact Number: (209) 468-0227	
Mailing Address: 1810 E. Hazelton Avenue		City: Stockton	State: CA Zip: 95205
Permit Type and Number (if known): Site Approval PA-2200142	Subject to Project-Level Discretionary Approval? <input type="checkbox"/> Yes <input type="checkbox"/> No Last Project-Level Discretionary Approval Date: _____ Last Project-Level Ministerial Approval Date: _____		
D. Project Description			
Please briefly describe the project (e.g.: 300 multi family residential units apartments and 35,000 square feet of commercial uses): 4 story ; 40,925sf; 81 guestroom hotel with an outdoor patio area and 84 parking stalls			
Please check the box next to each applicable land use below:			Select land use setting below:
<input checked="" type="checkbox"/> Commercial / Retail	<input type="checkbox"/> Educational	<input type="checkbox"/> Office	<input type="checkbox"/> Warehouse
<input type="checkbox"/> Residential	<input type="checkbox"/> Government	<input type="checkbox"/> Industrial	<input type="checkbox"/> Distribution Center
<input type="checkbox"/> Recreational (e.g. park)	<input type="checkbox"/> Medical	<input type="checkbox"/> Manufacturing	<input type="checkbox"/> Other: _____
			<input type="checkbox"/> Urban <input checked="" type="checkbox"/> Rural
E. Notice of Violation		F. Voluntary Emission Reduction Agreement	
Is this application being submitted as a result of receiving a Notice of Violation (NOV) from the District? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes, NOV # _____		Is this project part of a larger project for which there is a Voluntary Emission Reduction Agreement (VERA) with the District? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes, VERA # _____	
G. Optional Section			
Do you want to receive information about the Healthy Air Living Business Partners Program? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
FOR APCD USE ONLY			
Filing Fee Received: _____ Date Paid: _____ Applicant #: C-303728	Check #: _____ Project #: C-20220437	<u>Date Stamp: Finance</u>	<u>Date Stamp: Permit</u> RECEIVED Sept. 29, 2022 Permits Services SJVAPCD

H. Parcel and Land Owner Information

	APN (000-000-00 Format)	Gross Acres	Land Owner
1.	055-320-66	2.71	PDK Hospitality, LLC
2.			
3.			
4.			

Additional sheets for listing APN numbers can be found on the District's website at www.valleyair.org.

I. Project Development and Operation

Will the project require demolition of existing structures?	<input type="checkbox"/> Yes, <i>complete I-1</i>	<input checked="" type="checkbox"/> No, <i>complete I-2</i>
---	---	---

I-1. Demolition

Total square feet of building(s) footprint to be demolished:	Number of Building Stories:
Demolition Start Date (Month/Year):	Number of Days for Demolition:

I-2. Timing

Expected number of work days per week during construction? <input checked="" type="checkbox"/> 5 days <input type="checkbox"/> 6 days <input type="checkbox"/> 7 days	Will the project be developed in multiple phases? <input type="checkbox"/> Yes, <i>complete I-3</i> <input checked="" type="checkbox"/> No, <i>complete I-4</i>
--	--

I-3. Phased Site Development and Building Construction

In addition to the information below the applicant may submit a phase specific activity timeline. The phase specific activity timeline form can be found on the District's website at www.valleyair.org.

1	Start of Construction (Month/Year):	Gross Acres:
	End of Construction (Month/Year):	Net Acres (area devoted to buildings/structures):
	First Date of Occupation (Month/Year):	Paved Parking Area (# of Spaces):
	Building Square Footage:	Number of Dwelling Units:
2	Start of Construction (Month/Year):	Gross Acres:
	End of Construction (Month/Year):	Net Acres (area devoted to buildings/structures):
	First Date of Occupation (Month/Year):	Paved Parking Area (# of Spaces):
	Building Square Footage:	Number of Dwelling Units:
3	Start of Construction (Month/Year):	Gross Acres:
	End of Construction (Month/Year):	Net Acres (area devoted to buildings/structures):
	First Date of Occupation (Month/Year):	Paved Parking Area (# of Spaces):
	Building Square Footage:	Number of Dwelling Units:
4	Start of Construction (Month/Year):	Gross Acres:
	End of Construction (Month/Year):	Net Acres (area devoted to buildings/structures):
	First Date of Occupation (Month/Year):	Paved Parking Area (# of Spaces):
	Building Square Footage:	Number of Dwelling Units:

Additional sheets for phasing information can be found on the District's website at www.valleyair.org.

I-4. Single Phase Development

Start of Construction (Month/Year): January 2023	Gross Acres: 2.71
End of Construction (Month/Year): October 2023	Net Acres (area devoted to buildings/structures): 0.25
First Date of Occupation (Month/Year): November 2023	Paved Parking Area (# of Spaces): 84
Building Square Footage: 40,925sf	Number of Dwelling Units: 81 Guestrooms

J. On-Site Air Pollution Reductions (Mitigation Measures)

Listed below are categories of possible mitigation measures that will reduce a project's impact on air quality. If a category is applicable to the project, check "Yes", and please complete the corresponding page to identify specific mitigation measures within that category. If a category is not applicable to the project, check "No" and provide justification for not selecting the measure(s).

1. Construction Clean Fleet (making a commitment to using a construction fleet that will achieve the emission reductions required by District Rule 9510)

Yes, please complete mitigation measure 1

No, please provide justification: Other mitigation measures will be used at this time.

2. Land Use/Location (e.g. increased density, improve walkability design, increase transit, etc.)

Yes, please complete applicable mitigation measures 2a through 2f Note: Project is in a rural, freeway service area surrounded by

No, please provide justification: farmland with no dwelling units in specified radius

3. Neighborhood/Site Enhancements (e.g. improve pedestrian network, traffic calming measures, NEV network, etc.)

Yes, please complete applicable mitigation measures 3a through 3c

No, please provide justification: Note: Project is in a rural, freeway service area with limited pedestrian or transit connections.

4. Parking Policy/Pricing (e.g. parking cost, on-street market pricing, limit parking supply, etc.)

Yes, please complete applicable mitigation measure 4a through 4e

No, please provide justification: Municipal and Hotel Brand parking ratios exceeds ITE ratio.

5. Commute Trip Reduction Programs (e.g. workplace parking charge, employee vanpool/shuttle, ride sharing program, etc.)

Yes, please complete applicable mitigation measures 5a through 5f

No, please provide justification: Other mitigation measures will be used at this time.

6. Building Design (e.g. woodstoves or fireplaces)

Yes, please complete mitigation measure 6

No, please provide justification: No gas or wood fireplaces in hotel design

7. Building Energy (e.g. exceed title 24, electrical maintenance equipment)

Yes, please complete applicable mitigation measures 7a through 7b

No, please provide justification:

8. Solar Panels (e.g. incorporate solar panels in the project)

Yes, please complete applicable mitigation measure 8

No, please provide justification: Project will provide structural infrastructure for future installation of solar panels on roof per CBC 2019 requirements

9. Electric Vehicle (EV) Charger (e.g. incorporate EV charger(s) in the project)

Yes, please complete applicable mitigation measure 9

No, please provide justification:

K. Review Period

You may request a five (5) day period to review a draft of the District's analysis of your project before it is finalized. However, if you choose this option, it will delay the project's finalization by five (5) business days.

I request to review a draft of the District's analysis.

L. Fee Deferral Schedule

If the project's on-site air pollution reductions (mitigation measure) insufficiently reduced air pollution as outlined in Rule 9510, an off-site fee is assessed based on the excess air pollution. The money collected from this fee will be used by the District to reduce air pollution emissions 'off-site' on behalf of the project.

An Applicant may request a deferral of all or part of the 'off-site' fees up to, but not to exceed, the start date of construction. The start of construction is any of the following, whichever occurs first: start of grading, start of demolition, or any other site development activities not mentioned above.

I request a Fee Deferral Schedule, and have enclosed the Fee Deferral Schedule Application.

The Fee Deferral Schedule Application, can be found on the District's website at www.valleyair.org.

M. Change of Project Developer

The Applicant assumes all responsibility for ISR compliance for this project. If the project developer changes, the Applicant must notify the Buyer, and both Buyer and Applicant must file a 'Change of Project Developer' form with the District. If there is a change of project developer, and a 'Change of Project Developer' form is not filed with the District, the Applicant will remain liable for ISR compliance.

The Change of Project Developer form can be found on the District's website at www.valleyair.org.

N. Attachments

Required:

- Tract Map or Project Design Map
- Vicinity Map
- Application Filing Fee
\$841.00 for mixed use and non-residential projects **OR**
\$562.00 for residential projects only

If applicable:

- Letter from Applicant granting Agent authorization
- Fee Deferral Schedule Application
- Monitoring & Reporting Schedule
- Supporting documentation for selected Mitigation Measures

O. Certification Statement

I certify that I have reviewed and completed the entire application and hereby attest that the information relayed within is true and correct to the best of my knowledge. I commit to implementation of those on-site mitigation measures that I have selected above. I am responsible for notifying the District if I will be unable to implement these mitigation measures. If a committed mitigation measure is not implemented, the project may be re-assessed for air quality impacts.

(An authorized Agent may sign the form in lieu of the Applicant if an authorization letter **signed by the Applicant** is provided).

Name (printed): David Burkett

Title: Principal Architect

Signature: 

Date: 09/28/2022

Memorandum

Date: March 21, 2023
To: Jai Patel
From: Carly Hoyt, Ron Milam - Fehr & Peers
Subject: **VMT Assessment for the Tru by Hilton Hotel Development Project in San Joaquin County**

RS23-4254

This memorandum summarizes the vehicle miles traveled (VMT) impact assessment for the proposed Tru by Hilton Hotel Development Project located in Unincorporated San Joaquin County. This assessment is intended to comply with California Environmental Quality Act (CEQA) Section 15064.3 requirements. The proposed project includes an approximately 38,600 square foot hotel with 80 rooms. The project site is located between Thornton Road and N Flag City Boulevard, south of Highway 12 and north of W Banner Street. Parcels directly north, east, and west of the project site are undeveloped; south of the project site is the Flag City RV Resort. Access to the proposed project would be provided by W Banner Street.

Regulatory Framework

Senate Bill 743

Senate Bill (SB) 743 was signed into law in 2013 and changed the way transportation impact analyses are being prepared. Instead of analyzing the impact of land use projects on drivers using metrics like delay and level of service (LOS), transportation impacts are now based on the effects of driving as measured using VMT. The specific changes are codified in Section 15064.3 of the CEQA Guidelines, which states that generally, vehicle miles traveled is the most appropriate measure of transportation impacts. And, according to 15064.3(a), *"Except as provided in subdivision (b)(2) (regarding roadway capacity), a project's effect on automobile delay shall not constitute a significant environmental impact."* The provisions of 15064.3 have applied statewide since July 1, 2020.

While the CEQA Guidelines do not contain detailed guidance for individual land uses, Section 15064.3(b)(1) recommends, *"Projects that decrease vehicle miles traveled in the project area*



compared to existing conditions should be presumed to have a less than significant transportation impact."

Office of Planning & Research Technical Advisory

To aid lead agencies with SB 743 implementation, the Office of Planning & Research (OPR) produced the Technical Advisory: On Evaluating Transportation Impacts in CEQA (December 2018). The Technical Advisory helps lead agencies think about the variety of implementation questions they face with respect to shifting to a VMT metric. This guidance does not address hotel land uses, but offers recommendations for local serving retail uses that may be applicable under some circumstances.

Page 17 of the Technical Advisory generally describes retail development including stores less than 50,000 square feet as locally-serving. In the context of CEQA, it concludes that locally-serving retail may be found to have a less-than-significant transportation impact. The general premise behind this recommendation is that locally-serving retail developments rarely generate new trips, rather they result in a redistribution of existing trips (e.g., people will go to the grocery store regardless, therefore, providing a new grocery store will simply redistribute trips from existing grocery stores).

The Technical Advisory does not provide specific threshold recommendations for "other" land use types, such as a hotel, and it states that lead agencies may develop their own specific thresholds. Therefore, San Joaquin County has discretion in choosing a suitable VMT impact analysis approach.

San Joaquin County VMT Thresholds Study

The San Joaquin County VMT Thresholds Study (San Joaquin County and GHD, 2020) includes screening criteria, methodology, and thresholds for VMT analysis. Although it does not explicitly note methodology or thresholds for hotel developments, it does include the following screening criteria for retail developments.

- Consistent with recommendations in the OPR Technical Advisory, locally-serving retail projects, typically less than 50,000 square feet, are recommended to be screened from analysis. The VMT Thresholds Study recommends that the County retain the ability to require a market study, on a project-by-project basis, if in the County's judgement a "locally-serving" determination is questionable. The point of the market study is to help conclude whether the retail development can be deemed locally serving, or if it would qualify as regional serving.



VMT Assessment Approach

Trips to/from hotel land uses differ from more common land use types such as residential, office, commercial, etc. For this reason, traditional analysis methods such as a travel demand model are not adequate for accurately quantifying the VMT a hotel would generate. When methods do not exist to accurately quantify a project's VMT, the CEQA Guidelines Section 15064.3(b)(3) allows for the use of qualitative analysis and recommends considering factors such as the availability of transit and proximity to other destinations to gauge potential VMT impacts. These factors influence the ability to access the project site by walking, biking, and transit while also contributing to shorter trip lengths for vehicle trips. This analysis also utilizes recent market reports for hotel developments in neighboring communities to evaluate existing supply and demand of hotels in the area. This is to help determine if the proposed project would result in new trips and potentially a net increase in total VMT, or if it can be presumed to result in a redistribution of existing trips. A final factor in the qualitative assessment is whether the approval of the project would encourage development in a travel efficient location (page 17 of the OPR Technical Advisory).

VMT Assessment

Like locally-serving retail developments, hotel developments rarely generate new trips, rather, they often result in a redistribution of existing trips. Hotels are not typically a destination; they are merely a stop on the way to the final destination. For a hotel to generate new trips (and new VMT), it would need to include unique features that attract new visitors to the area (e.g., Great Wolf Lodge located in Manteca or Wine & Roses in Lodi). The proposed hotel does not include any unique features that would justify it serving as a final destination. Additionally, the project does not affect the local or regional population, disposable income for travel, or the attractiveness of local destinations. The project's main effect is to increase hotel room supply creating more room choices for visitors.

Occupancy Data

Recent hotel occupancy data for the City of Lodi and City of Stockton was obtained for years 2021 and 2022. Although the proposed project is in Unincorporated San Joaquin County, rather than the City of Lodi, two existing hotels located approximately ¼ mile west of the proposed project (which are also located in Unincorporated San Joaquin County) are included in the City of Lodi hotel occupancy data set. Therefore, it is appropriate to include Lodi data in the occupancy analysis. City of Stockton data is appropriate because travelers on I-5 that currently stay in City of Stockton may elect to stay at the proposed hotel once constructed. **Table 1** displays the occupancy data.



Hotel Occupancy Data		
City	Occupancy %	
	2021	2022
Lodi	68.6	60.6
Stockton	73.4	63.2
Average	71.0	61.9

Notes: Occupancy data derived from the 2022 STR report obtained March 2023.
Source: Fehr & Peers, 2023

As displayed, on average approximately 71 percent of rooms in the area were occupied in 2021 and 62 percent of rooms in the area were occupied in 2022. This indicates that on an annual basis, supply does not exceed demand. Thus, a new hotel would likely draw market share from other existing hotels in the area, thereby diluting the average occupancy for other hotels in the area. This is graphically displayed on **Figure 1**.

Proximity to Other Destinations

The proposed project is located within approximately ¼ mile of multiple fast-food restaurants, gas stations, and a coffee shop (Starbucks). From a walkability perspective, hotel guests can easily access food without having to drive. The fact that access to the hotel is provided from W Banner Street (rather than Highway 12) increases the likelihood that guests may walk as they do not have to walk along the highway. Close proximity to gas stations allows guests traveling the I-5 corridor to get gas without going out of their way (and increasing VMT) before getting back on the freeway.

Travel Efficient Location

Because the proposed project will likely serve as an overnight stop for individuals passing through the area, it is located in a travel efficient location with respect to highway commercial uses given its close proximity to I-5 and Highway 12. The hotel is located approximately ½ mile from the freeway and is adjacent to Highway 12. Therefore, it is in an efficient location for guests traveling along the I-5 corridor or traveling on Highway 12, as the diverted trip length is very short.

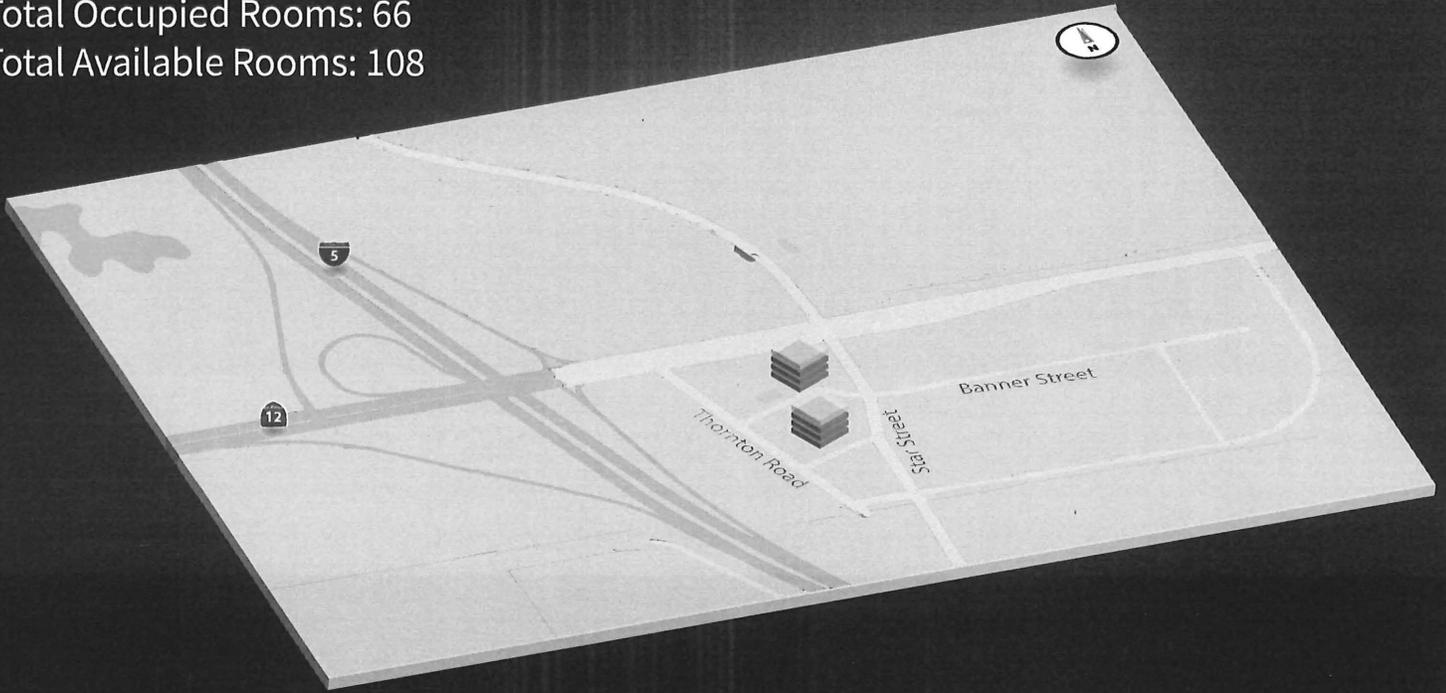
Conclusion

The proposed project would increase the hotel room supply in the study area and offer another hotel choice near supporting food and gas services. As such, the project's main effect is to redistribute existing hotel trips without adding to the length of those trips. Based on the evidence presented above, the project is presumed to have a **less-than-significant** VMT impact.

Before Project

Total Occupied Rooms: 66

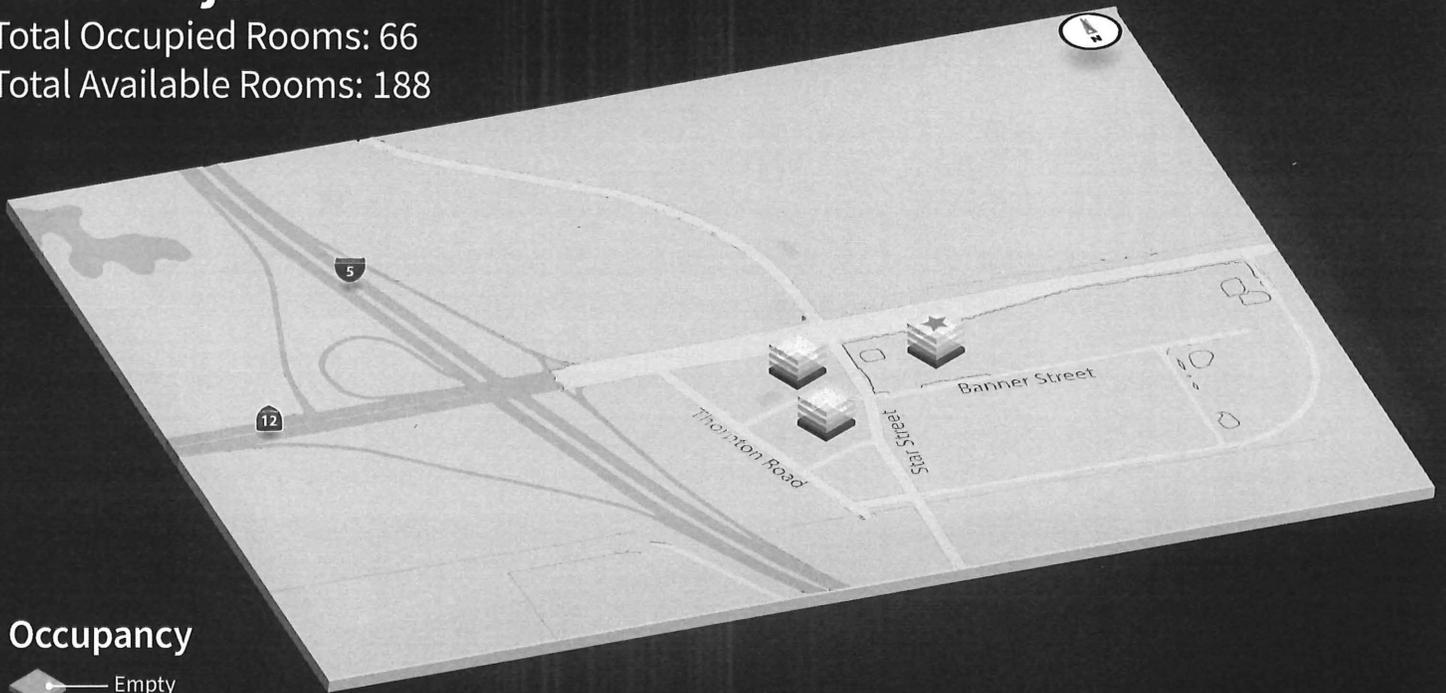
Total Available Rooms: 108



After Project

Total Occupied Rooms: 66

Total Available Rooms: 188



Occupancy

- Empty
- 37% Capacity
- 61% Capacity

★ Proposed Project

Note: The 2022 STR report for the City of Lodi was used to determine the average occupancy rate for the area. The STR report does not provide occupancy information for each individual hotel (rather the City as a whole); therefore, the average occupancy rate for the City of Lodi is displayed. However, occupancy data for the two hotels displayed is included in the City's overall average.

Figure 1
Hotel Occupancy Redistribution