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State Clearinghouse No. 2024020668

LODI 2025 GENERAL PLAN UPDATE

for the City of Lodi

Prepared for:

City of Lodi

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Table of Contents

Section	Page
1. INTRODUCTION.....	1
1.1 INTRODUCTION.....	1
1.2 FORMAT OF THE FEIR.....	1
1.3 CEQA REQUIREMENTS REGARDING COMMENTS	2
2. RESPONSE TO COMMENTS	5
3. REVISIONS TO THE DEIR.....	21
3.1 INTRODUCTION	21
3.2 REVISIONS TO THE DEIR IN RESPONSE TO COMMENTS.....	21
3.3 DRAFT SEIR REVISIONS.....	23

Table of Contents

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1. Introduction

1.1 INTRODUCTION

This Final Environmental Impact Report (FEIR) has been prepared in accordance with the California Environmental Quality Act (CEQA), as amended (Public Resources Code Sections 21000 et seq.), and CEQA Guidelines (California Code of Regulations Sections 15000 et seq.).

According to the CEQA Guidelines, Section 15132, the FEIR shall consist of:

- (a) The Draft (Subsequent) Environmental Impact Report (SEIR) or a revision of the SEIR;
- (b) Comments and recommendations received on the SEIR either verbatim or in summary;
- (c) A list of persons, organizations, and public agencies commenting on the SEIR;
- (d) The responses of the lead agency to significant environmental points raised in the review and consultation process; and
- (e) Any other information added by the lead agency.

This document contains responses to comments received on the SEIR for the Lodi 2025 General Plan Update during the 45-day public review period, which began April 28, 2025, and closed June 12, 2025. This document has been prepared in accordance with CEQA and the CEQA Guidelines and represents the independent judgment of the lead agency. This document and the circulated SEIR comprise the FSEIR, pursuant to CEQA Guidelines, Section 15132.

1.2 FORMAT OF THE FEIR

Section 1, Introduction. This section describes the CEQA requirements and contents of this FSEIR.

Section 2, Response to Comments. This section provides a list of agencies and interested persons that commented on the DEIR; copies of comment letters received during the public review period, and the lead agency's responses to written comments. To facilitate review of the responses, each comment letter has been reproduced and assigned an alphanumeric designator (A through B for letters received from agencies and organizations, and no letters received from residents). Individual comments have been numbered for each letter, and the letter is followed by responses with references to the corresponding comment number.

In accordance with CEQA, Public Resources Code Section 21092.5, copies of the lead agency's written responses to public agencies will be forwarded to those agencies at least 10 days prior to certifying the EIR. The responses will be forwarded with copies of this FSEIR, as permitted by CEQA, and will conform to the legal standards established for response to comments.

1. Introduction

Section 3, Revision to the DEIR in Response to Comments

This section contains revisions to the SEIR text and figures resulting from comments received by agencies and interested people as described in Section 2, and/or errors and omissions discovered after release of the SEIR for public review. The responses to comments contain material and revisions that will be added to the text of the FSEIR.

The City of Lodi has reviewed this material and determined that none of this material constitutes the type of significant new information that requires recirculation of the SEIR for further public comment under CEQA Guidelines Section 15088.5. None of this new material indicates that the project will result in a significant new environmental impact not previously disclosed in the SEIR. Additionally, none of this material indicates that there would be a substantial increase in the severity of a previously identified environmental impact that will not be mitigated, or that there would be any of the other circumstances requiring recirculation described in Section 15088.5.

1.3 CEQA REQUIREMENTS REGARDING COMMENTS

CEQA Guidelines Section 15204 outlines parameters for persons and public agencies reviewing and commenting on the sufficiency of environmental impact reports.

Section 15204 of the State CEQA Guidelines states, in pertinent part:

(a) In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentators. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.

...

(c) Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.

(d) Reviewing agencies or organizations should include with their comments the name of a contact person who would be available for later consultation if necessary. Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency's statutory responsibility.

1. Introduction

(e) This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.

(f) Prior to the close of the public review period for an EIR or mitigated negative declaration, a responsible or trustee agency which has identified significant effects on the environment may submit to the lead agency proposed mitigation measures which would address those significant effects. Any such measures shall be limited to impacts affecting those resources which are subject to the statutory authority of that agency. If mitigation measures are submitted, the responsible or trustee agency shall either submit to the lead agency complete and detailed performance objectives for the mitigation measures, or shall refer the lead agency to appropriate, readily available guidelines or reference documents which meet the same purpose.

1. Introduction

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2. Response to Comments

Section 15088 of the CEQA Guidelines requires the lead agency (City of Lodi) to evaluate comments on environmental issues received from public agencies and interested parties who reviewed the SEIR and prepare written responses.

Regarding evaluation and responses to public comments, Section 15088 of the State CEQA Guidelines states:

(a) The lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The lead agency shall respond to comments raising significant environmental issues received during the noticed comment period and any extensions and may respond to late comments.

(b) The lead agency shall provide a written proposed response, either in a printed copy or in an electronic format, to a public agency on comments made by that public agency at least 10 days prior to certifying an environmental impact report.

(c) The written response shall describe the disposition of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections). In particular, the major environmental issues raised when the lead agency's position is at variance with recommendations and objections raised in the comments must be addressed in detail giving reasons why specific comments and suggestions were not accepted. There must be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice. The level of detail contained in the response, however, may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). A general response may be appropriate when a comment does not contain or specifically refer to readily available information, or does not explain the relevance of evidence submitted with the comment.

(d) The response to comments may take the form of a revision to the draft EIR or may be a separate section in the final EIR. Where the response to comments makes important changes in the information contained in the text of the draft EIR, the lead agency should either:

(1) Revise the text in the body of the EIR, or

(2) Include marginal notes showing that the information is revised in the response to comments.

This section includes all written comments received on the SEIR during the 45-day public review period, discussed in Section 1, and the City of Lodi's responses to each comment. Brackets delineating the individual comments and an alphanumeric identifier have been added to the right margin of the letter. Responses to each comment identified are on the page(s) following each comment letter. Where sections of the SEIR are excerpted in this document, changes to the SEIR text are shown in underlined text for additions and ~~strikeouts~~ for deletions.

2. Response to Comments

The following is a list of agencies, organizations, and individuals that submitted comments on the DEIR during the public review period.

Letter Reference	Commenting Person/Agency	Date of Letter
Agencies and Organizations		
A	California Geological Survey	May 29, 2025
B	California Department of Fish and Wildlife	June 13, 2025

2. Response to Comments

LETTER A – California Geological Survey (2 pages)

2. Response to Comments

LETTER A – California Geological Survey, pg 1

2. Response to Comments

LETTER A – California Geological Survey, pg 2

2. Response to Comments

A. Response to Comments from California Geological Survey (CGS), dated May 29, 2025.

- A-1 *The CGS states that the that although the DEIR notes that the City and SOI are not within a liquefaction zones CGS suggests revising the text to instead state that the lack of a liquefaction zone should be interpreted to mean the area has yet to be evaluated by CGS for liquefaction hazard and not to mean that there is no liquefaction zone.*

See Section 3.2, Revisions to the SEIR in Response to Comments, which updates the project description and includes a bioretention basin, electrical vehicle charging stations, and bicycle parking. As this comment does not raise significant environmental issues or describe any inadequacies of the SEIR, no changes to the SEIR are necessary.

Revisions to the SEIR based on this clarification are provided in Section 3.2, Revisions to the SEIR in Response to Comments, of the FSEIR. This update is a minor clarification to the SEIR and does not alter the findings or result in material changes to the project's environmental analysis. As this comment does not raise significant environmental issues or describe any inadequacies of the SEIR, no changes to the SEIR are necessary.

- A-2 *CGS advises that the city can monitor updated maps and seismic hazard data as it becomes available on their websites. These resources will help the city stay informed about potential risks such as liquefaction and earthquake-induced landslides as evaluations and mapping progress.*

See comment A-1.

2. Response to Comments

LETTER B – California Department of Fish and Wildlife (5 pages)

2. Response to Comments

LETTER B – California Department of Fish and Wildlife, page 1

2. Response to Comments

LETTER B – California Department of Fish and Wildlife, page 2

2. Response to Comments

LETTER B – California Department of Fish and Wildlife, page 3

2. Response to Comments

LETTER B – California Department of Fish and Wildlife, page 4

2. Response to Comments

LETTER B – California Department of Fish and Wildlife, page 5

2. Response to Comments

B. Response to Comments from California Department of Fish and Wildlife, dated June 13, 2025.

B-1 *The California Department of Fish and Wildlife (CDFW) reviewed the Draft EIR and previously submitted comments on its Notice of Preparation. CDFW appreciates the opportunity to provide input on project activities that may impact fish, wildlife, plants, and their habitats, and to exercise its regulatory authority where applicable. As a Trustee Agency, CDFW is responsible for the conservation and protection of California's natural resources and offers biological expertise during CEQA review processes. CDFW may also act as a Responsible Agency if the project falls under its jurisdiction, such as activities affecting lakes, streambeds, or endangered species. Therefore, the project may require permits or authorizations from CDFW under the Fish and Game Code, including potential take permits under the California Endangered Species Act. CDFW also summarizes the project.*

This comment does not raise significant environmental issues or describe any inadequacies of the SEIR, and no changes to the SEIR are necessary.

B-2 *The CDFW criticizes the DEIR for deferring mitigation measures and relying too heavily on future compliance with state and federal laws to address biological resource impacts. CDFW argues this approach is inadequate because such approvals are not guaranteed, making the proposed mitigation unenforceable. The DEIR also lacks clear performance standards, such as no-net-loss policies for wetlands, riparian areas, or special-status species habitats. To ensure effective mitigation, CDFW recommends the City include explicit performance standards in the General Plan. These should involve measures like habitat protection at a minimum 3:1 mitigation ratio and be incorporated into the Mitigation Monitoring and Reporting Program (MMRP) and future project approvals.*

The proposed project is a General Plan Update and does not include specific development proposals or site-specific projects. Therefore, it would be speculative to identify detailed, project-level mitigation measures or performance standards for potential future impacts. The General Plan SEIR is a programmatic document that evaluates broad environmental effects and establishes a framework to guide future planning and development. Project-specific environmental review, including the identification of enforceable mitigation measures and performance standards, will be conducted as individual development proposals come forward. At that time, compliance with applicable state and federal regulations will be required.

In addition, CDFW's recommendation to incorporate explicit performance standards into the General Plan is considered a comment on the content of the proposed plan, rather than on the adequacy of the SEIR under CEQA. Therefore, no further action under CEQA is required in response to this comment.

B-3 *CDFW states that the DEIR lacks clear thresholds of significance for biological resources, making it difficult for agencies to determine when mitigation is necessary or whether it is adequate. Under CEQA, lead agencies must disclose foreseeable impacts and assess significance where feasible. CDFW recommends that the city defines specific thresholds of significance for impacts such as habitat conversion and effects on species. These thresholds should align with CEQA Guidelines, CDFW guidance, and the San Joaquin*

2. Response to Comments

Multi-Species Conservation Plan (SJMSCP). Doing so would improve consistency in evaluating future project-level biological impacts.

The General Plan EIR is a program-level document that evaluates broad environmental impacts associated with implementation of the General Plan Update. As such, it provides general thresholds of significance consistent with Appendix G of the CEQA Guidelines and evaluates impacts at a citywide scale. Establishing detailed species- or habitat-specific thresholds of significance would be more appropriately addressed at the project level environmental evaluation, when site specific development proposals are under review and detailed site conditions are known.

- B-4 *CDFW states that while the DEIR mentions habitat connectivity, it lacks detailed mapping, impact analysis, and mitigation measures for wildlife corridors and habitat fragmentation. This omission may overlook threats posed by development and roadway expansion to sensitive species and habitats. CDFW recommends the city include updated mapping and habitat assessments for existing wildlife corridors within the plan area. Incorporating this information into the General Plan would support better impact avoidance and buffer planning in future projects.*

This comment offers recommendations for future policy development and planning under the General Plan Update and does not raise concerns regarding the adequacy of the SEIR under CEQA. As a program-level document, the SEIR provides a broad analysis of potential environmental impacts and establishes a framework for evaluating site-specific impacts during future project-level reviews. Project-level environmental review will include more detailed analysis of habitat fragmentation and wildlife movement impacts, as well as appropriate mitigation measures consistent with applicable state and federal regulations.

- B-5 *CDFW notes that while the DEIR acknowledges the role of habitat enhancement in climate resilience, it lacks specific measures or restoration priorities. Given the increasing severity of climate change impacts like droughts, floods, and extreme temperatures, proactive planning is needed to protect functional habitats. CDFW recommends the city incorporate climate adaptation strategies into the General Plan. Suggested measures include creating exclusion zones for special-status plants and restoring degraded habitat in parks and open spaces. These strategies should be established as General Plan goals and implemented through specific programs.*

The Safety and Conservation Element includes the following policies aimed at addressing climate-related issues and biological resources:

- Policy C-G10: Reduce greenhouse gas emissions by 15% over 2008 levels by 2020, to slow the negative impacts of global climate change.
- Policy C-P52: Implement a regular monitoring program to assess the health and resilience of the identified natural features, including creeks, and woodlands. Findings from the monitoring program will be used to inform adaptive management strategies,

2. Response to Comments

making necessary adjustments to policies and practices to ensure the continued protection and enhancement of natural features.

- Policy S-P13: Monitor and research the potential impacts of climate change and flooding on local habitat and wildlife.
- Policy S-P57: Protect vulnerable natural and recreational habitats and parks impacted by extreme heat through expansion of large contiguous greenspaces wherever possible for greater cooling magnitude and extent. Increase use of drought tolerant and native plants in landscaping.

This comment pertains to the content of the proposed General Plan Update and offers suggestions for future policy development related to climate adaptation and habitat resilience. It does not raise an issue regarding the adequacy of the SEIR under CEQA. Therefore, no further response or revision to the SEIR is required.

B-3 *CDFW notes that the DSEIR does not include sufficient detail regarding long-term monitoring, reporting, or adaptive management of biological mitigation. This raises concerns about how the City will ensure mitigation effectiveness or respond to evolving environmental conditions. CDFW recommends that the General Plan require project-level biological monitoring plans, annual reporting, and adaptive management strategies. These measures would help address ineffective mitigation or declining ecological trends. Coordination with CDFW and the San Joaquin Council of Governments (SJCOC) is also recommended to ensure consistency in implementation.*

The General Plan EIR is a program-level document that evaluates broad environmental impacts associated with implementation of the General Plan Update. As such, it provides general thresholds of significance consistent with Appendix G of the CEQA Guidelines and evaluates impacts at a citywide scale. Establishing detailed species- or habitat-specific thresholds of significance would be more appropriately addressed at the project level, when specific development proposals are under review and detailed site conditions are known.

B-6 *CDFW states that the DEIR lacks clear thresholds of significance for biological resources, making it difficult for agencies to determine when mitigation is necessary or whether it is adequate. Under CEQA, lead agencies must disclose foreseeable impacts and assess significance where feasible. CDFW recommends that the city defines specific thresholds of significance for impacts such as habitat conversion and effects on species. These thresholds should align with CEQA Guidelines, CDFW guidance, and the San Joaquin Multi-Species Conservation Plan (SJMSCP). Doing so would improve consistency in evaluating future project-level biological impacts.*

This comment pertains to the content of the proposed General Plan Update and does not raise an issue regarding the adequacy of the SEIR under CEQA. Long-term monitoring, reporting, and adaptive management measures are most appropriately developed and implemented at the project level, where site-specific conditions, impacts, and mitigation needs can be accurately identified.

2. Response to Comments

As a program-level document, the General Plan Update establishes a policy framework to guide future development, while detailed biological mitigation measures and monitoring plans will be addressed through subsequent project-specific environmental review. At that time, the city will ensure compliance with all applicable state and federal requirements and may coordinate with CDFW, and other agencies as needed to ensure mitigation effectiveness.

Additionally, the Conservation Element of the General Plan includes Policy P17, which states:

"Continue to coordinate with the San Joaquin Council of Governments and comply with the terms of the Multi-Species Habitat Conservation and Open Space Plan to protect critical habitat areas that support endangered species and other special-status species."

This policy demonstrates the City's commitment to regional conservation planning and ongoing coordination for habitat protection.

B-7

CDFW reminds the city of its obligation under CEQA to submit data on special-status species and natural communities identified during project surveys to the California Natural Diversity Database. The agency also notes that the proposed project would impact fish and/or wildlife and therefore requires payment of CEQA filing fees upon filing of the Notice of Determination. CDFW requests written notification of proposed actions and decisions regarding the project. The agency expresses appreciation for the opportunity to comment and offers continued support for consultation on biological resource issues.

The City will ensure that any special-status species or natural community data identified during future project-level biological surveys are submitted to the California Natural Diversity Database (CNDDDB), in accordance with CEQA requirements (Public Resources Code Section 21003(e)). Additionally, the City acknowledges that, if future development under the General Plan results in impacts to fish and/or wildlife, the applicable filing fees to the California Department of Fish and Wildlife will be paid at the time of filing the Notice of Determination, pursuant to Fish and Game Code Section 711.4 and CEQA Guidelines Section 753. 5.

3. Revisions to the DEIR

3.1 INTRODUCTION

This section contains revisions to the DEIR based on (1) additional or revised information or clarifications generated in response to information or concerns raised by a specific comment, or independently by the City; (2) applicable updated information that was not available at the time of DEIR publication; and/or (3) typographical errors. Changes made to the DEIR are identified here in ~~strikeout text~~ to indicate deletions and in underlined text to signify additions.

These corrections, clarifications, and additions to the DEIR are provided to clarify and amplify the DEIR. The revisions incorporate material and updates added to the EIR text as part of the FEIR. None of this new material constitutes “significant new information” requiring recirculation as defined in Section 15088.5(a) of the State CEQA Guidelines. Specifically, the following criteria are not met:

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project’s proponents decline to adopt it.
4. The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

3.2 REVISIONS TO THE DEIR IN RESPONSE TO COMMENTS

The text on pages 8–9 of Chapter 8, Impacts Found Not to Be Significant, under the heading “Geology and Soils” in the SEIR, has been revised in response to Comment A-1 from the California Geological Survey, dated May 29, 2025.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. According to the California Geological Survey, the City and SOI ~~are not within a liquefaction zone (CGS 2023)~~ have not yet been evaluated for liquefaction hazards. The absence of a designated “liquefaction zone” does not indicate a lack of liquefaction risk; rather, it reflects that CGS has not yet assessed this area. As mapping and evaluations continue, the city can consult CGS’s online resources, where

3. Revisions to the DEIR

seismic hazard maps and data are regularly updated. This information should be reviewed and considered for any future projects proposed under the General Plan Update. All future developments in the City and SOI would be required to comply with the most recent version of the CBC which would ensure that liquefaction impacts, if any, would be reduced. Additionally, the General Plan Update policies include Policy S-P27, which requires that geotechnical investigations for critical structures (e.g., police stations, fire stations, water towers, and large public buildings) before construction or building permit approval, if deemed necessary. The investigation must assess the maximum credible earthquake, ground acceleration, duration, and the potential for ground failure due to liquefaction or differential settling. As with the 2009 Certified EIR, impacts would be less than significant.

The text on pages 8–10 of Chapter 8, Impacts Found Not to Be Significant, under the heading “Geology and Soils” in the DEIR, has been revised in response to Comment A-1 from the California Geological Survey, dated May 29, 2025.

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?

Less Than Significant Impact. Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. ~~As the City and SOI are not within a liquefaction or landslide zone, future development would not be at risk for lateral spreading (CGS 2023)~~ According to the California Geological Survey, the City and SOI have not yet been evaluated for liquefaction hazards. The absence of a designated “liquefaction zone” does not indicate a lack of liquefaction risk; rather, it reflects that CGS has not yet assessed this area. As mapping and evaluations continue, the city can consult CGS’s online resources, where seismic hazard maps and data are regularly updated. This information should be reviewed and considered for any future projects proposed under the General Plan Update.

The major cause of ground subsidence is the excessive withdrawal of groundwater. According to the California Department of Water Resources, ~~there is no land subsidence in the City or SOI (CDWR 2023).~~ All future developments under the proposed project would be required to comply with the most recent version of the CBC to ensure impacts are reduced. Additionally, the General Plan Update includes Policy S-P626 which requires soil reports for new projects. In the case that the soil report identifies geological hazards for a new project then the city would determine appropriate permitting requirements. Policy S-P25 prohibits seismically unsafe buildings from adjusting to higher occupancy or intensive use until an engineering evaluation and structural deficiencies are corrected by City building codes, and Policy S-P27 mandates geotechnical investigations for proposed critical structures before construction or building permit approval, including estimation of maximum credible earthquake, ground acceleration, duration, and potential ground failure due to liquefaction or differential settling. The General Plan Update policies would require new development to be reviewed for any geologic hazards. As with the 2009 Certified EIR, impacts would be less than significant.

3. Revisions to the DEIR

3.3 DRAFT SEIR REVISIONS

The following are additional revisions that have been made to the Draft SEIR. While these changes introduce new information, it is historic to the City of Lodi, and the analysis remains consistent with the revised impact discussion. Therefore, recirculation of the Draft SEIR is not required.

These revisions were made in response to comments from City Councilwoman Lisa Craig-Hensley regarding the incorrect identification of historical resources not present in Lodi, specifically in the downtown area. The edits to the Draft EIR remove the inaccurate references. However, it remains accurate that the City of Lodi, particularly the downtown, contains historic resources that could be affected by development facilitated by the Lodi 2025 General Plan Update. Therefore, the impact determination and mitigation measures presented in the Draft SEIR remain valid and unchanged and these corrections do not require recirculation. The edits have now been incorporated into the document.

The text on pages 4.4-8 of Chapter 4.4, Land Use and Planning, under the heading “Downtown” in the DEIR, has been revised in response to comments from City Councilwoman Lisa Craig-Hensley.

Downtown

Lodi's downtown area holds significant historical importance, serving as the heart of the city since its founding in 1869 (Lodi 2024b). Originally called Mokelumne, the city grew around the Central Pacific Railroad station, with Sacramento Street becoming the main thoroughfare (Lodi 2024b). The Lodi Arch, constructed in 1907 for the Tokay Carnival, is listed on the National Register of Historic Places (NRIS #80000848) and serves as a prominent visual landmark reflecting the city's agricultural heritage and community identity (Caparoso 2018a). Several additional historic buildings are



Lodi Mission Arch. Source City of Lodi.

located within the downtown area, including the ~~former Bank of Lodi building, the Friedberger-Blodgett Building, and the Hotel Lodi, dating back to 1915 (NRIS #95001140) (Caparoso 2018b24; WHS 2024), the Lodi Women's Club constructed in 1933 (NRIS #88000555) and the Carnegie Library. See Figure 3.5-1 Historic Resources, in the 2009 Lodi General Plan Environmental Impact Report.~~

3. Revisions to the DEIR

The text on pages 4.4-17 of Chapter 4.4, Land Use and Planning, under Impact LU-5 in the DEIR, has been revised in response to comments from City Councilwoman Lisa Craig-Hensley.

In addition, the downtown district, ~~which has a period of significance from 1866 to 1958~~, is notable for its historic architectural and commercial importance such as the Lodi Arch, Hotel Lodi, and Lodi City Hall as listed in Table 4.4-2. ~~The J.O. Eaton Building (161-165 S. Main Street), built in 1866, stands as the earliest, while others like the Charles G. Cummings building, J. Frank Collins Building (1883), Joel M. Pruyn Building (1885), Schmiedlin Bros. Building (1895), and Bank of Lodi Building (1895) showcase the evolution of the city's commercial architecture (WHS 2024).~~ Therefore, structures already existing in the Lodi downtown that are 50 years or older could have the potential to be designated as a historic resource pursuant to CEQA Guidelines Section 15064.5. Under the proposed project, the Downtown Specific Plan includes a goal to preserve the historic character of downtown. This will be achieved through tools for historic preservation and adaptive reuse, including creating a historic sites inventory with input from the San Joaquin Historical Society. Currently, the City does not have a sites inventory related to historic preservation (Lodi 2024c).

The text on pages 4.4-21 of Chapter 4.4, Land Use and Planning, under the heading “References” in the DEIR, has been revised in response to comments from City Councilwoman Lisa Craig-Hensley.

Caparoso, Randy. 2018a. Historic Lodi buildings and images (Part 1 - Sacramento and Main Streets). <https://www.lodiwine.com/blog/Historic-Lodi-buildings-and-images--Part-1---Sacramento-and-Main-Streets->

~~_____ . 2018b. Historic Lodi buildings (Part 2 - Past and present images of Lodi's glory days). <https://www.lodiwine.com/blog/Historic-Lodi-Buildings--Part-2---Past-and-present-images-of-Lodi-s-days->~~

~~_____ Lodi, City of. 2025. Mission Arch. <https://www.lodi.gov/610/Mission-Arch>~~

~~Wisconsin Historical Society (WHS). 2024 (accessed). Lodi Downtown Historic District. <https://www.wisconsinhistory.org/Records/NationalRegister/NR2239>.~~