



Stockton Planning Commission  
Via e-mail only

July 23, 2018

Re: Initial Comments on Updated Stockton General Plan and DEIR (Envision Stockton)

Chair Hull and Members of the Commission:

We are writing you this letter to document our initial impressions and comments to the Updated Stockton General Plan and DEIR, for consideration by your Commission when you hold the first meeting on the plan.

The members of both our groups have been actively involved in this update process since it was initiated several years ago. We have previously submitted letters to the Commission and City Council in April, June, and July, 2017.

To sum up our impressions of the Envision Stockton program:

There is a world of difference between the manner in which the City staff and consultants are treating public participation in this most recent update, compared to the disastrous process and results that led to the previous 2007 General Plan update. Citizen involvement has been encouraged and respected. The opinions of the majority of those that participated in workshops over the last 18 months have largely been reflected in the text and policies of the proposed plan, with one notable exception: the growth planned north of Eight Mile Road.

## **Initial Comments on General Plan Goals and Policies**

The proposed plan is a much more concise and focused document than the over-stuffed 2007 plan. This is good, since an overly lengthy plan with hundreds of policies is much more difficult to apply to land use and other planning decisions on a day to day basis. We especially appreciate Appendix A, “A Summary of Policies and Actions by Topic,” which is very handy (although we note that there doesn’t seem to be “Agricultural and Natural Resources” and “Public Facilities and Services” sections, which should be added.)

The largest single change in the new plan is the elimination of thousands of acres on the land use map of “Village” growth planned on prime agricultural lands at the periphery of the city. This feature made the 2007 plan an environmental disaster that could never, and would never, have been built. Soon after the 2007 plan was adopted the real estate market crashed, and housing demand in Stockton is now very different than what it was during the booming years of the early and mid-2000s.

The new plan rightfully heard the strong pleas from residents, business people, and concerned organizations to ensure that the new plan concentrated on infill growth, especially in the downtown and existing neighborhoods, and stop growth sprawling into the adjacent farmlands. (However, the inappropriate plans for substantial housing growth north of Eight Mile Road is grossly inconsistent with the infill goals and policies.)

In our last letter to the Commission dated June 9, 2017, we offered some dozen recommendations for additional changes to the preliminary list of General Plan goals and policies. We are pleased to see that many of these recommendations were accepted and are reflected in the draft plan. The addition of the Public Health section and its policies is also much appreciated. This was requested by many of our allies.

However, some recommendations were not accepted, and we repeat those and a couple additional policies that we have advocated in the past. We will continue to add to this list as we dive deeper into the plan.

- Add a “Sustainability/Climate Change” (or similar title) section and put in relevant goals, as noted below;
- Add goals that address climate change, greenhouse gas reduction, and clean energy (there are a few related goals and policies in the draft plan, e.g., POLICY CH-5.1 “Accommodate a changing climate through adaptation and resiliency planning and projects,” but several more should be added from the Climate Action Plan (we appreciate that the city has committed to updating the CAP);

- Add a goal that addresses need for City resiliency programs to combat climate changes due to rising sea levels and increased flood risk;
- Add a goal that addresses jobs/housing balance (POLICY LU-6.4 “Ensure that land use decisions balance travel origins and destinations in as close proximity as possible” is a start, but more specificity and consistency with the land use map is needed).;
- Add goals and policies (from Housing Element?) that address affordable housing and inclusionary housing;
- Add goals and policies that specifically support the redevelopment of struggling shopping centers into mixed use projects with a strong component of affordable housing;
- Add goals and policies that specifically address City/developer funding for increased transit services (this is required by the Settlement Agreement);
- Strengthen goals and policies related to curtailing sprawl at the City fringes and conservation of agricultural resources, and set forth detailed policies and a realistic plan to establish an “ag belt” between Stockton and Lodi, centered along Armstrong Road, and designate the ag buffer on the land use map (the existing POLICY LU-5.3 and Action LU-5.3B “Coordinate with San Joaquin County to develop a plan for a greenbelt or community separator around the city” is very vague, and will never get the job done. There should be an explicit policy to target ag lands just outside the Lodi and Stockton Spheres as a high priority for ag conservation easements, paid for by mitigation fees); and
- Add more specific goals related to crime prevention as recommended by Commissioners and members of the public.

### **What’s Happening North of Eight Mile Road?**

As expected, the most intensive fight to establish and memorialize the city’s new progressive infill-oriented growth policies is being fought over familiar territory: the 17,500 acres of agricultural lands north of 8 Mile Road that are designated in the current General Plan for future “Village” growth. The area includes 3,800 acres of prime ag land owned by the Spanos organization located north of Eight Mile Road on both sides of the I-5 freeway.

Spanos representatives have been tempting the city in recent years with visions of locating a new super job-generating use such as a technology park, or a major hospital complex, or a new college campus, on the land north of Eight Mile Road.

To recount the history of what has happened related to planning for these lands over the last several years, we quote from our July 21, 2017 letter to the City Council:

Over the last year, your Council and the Planning Commission have heard hundreds of residents express their opinions about future growth patterns in our City through the well-attended workshops and public meetings that were held by City staff and consultants. At three workshops held by the City in September 2016 there was no expressed support for more low density suburban construction on agricultural land outside the existing City limits. Rather, the participants strongly favored future growth concentrated in South and downtown Stockton and supported higher intensity, mixed use, modern buildings, along with multi-family and attached housing types (see Summary of General Plan workshops).

The clear support for infill development instead of sprawl is in line with the “Vision Statement” adopted by the City to guide the General Plan program. That statement reads:

“The edges of Stockton will be discrete and clear, agriculture will continue to thrive outside the urbanized city, and Stockton residents will enjoy scenic views of agricultural land. Development and redevelopment of vacant, underutilized, and blighted areas will be prioritized over development that extends into agricultural areas, strengthening the city’s core and preserving the open space that surrounds it.” (emphasis added)

To gauge community support for smart growth policies, CCG created and distributed an online survey in late 2016. The survey asks residents of Stockton about their preferences regarding the city’s growth patterns, and the results to date (over 400 responses) are clear: A strong majority of Stocktonians prefer policies that encourage infill development in existing neighborhoods while discouraging growth outside of city limits. Residents also showed an appetite for policies that create more affordable housing, neighborhoods with access to transit, and complete streets.

With regards to where our city should grow, the results of the CCG survey were clear:

- A total of 66% of respondents agreed with the statement that “Stockton should not grow north of Eight Mile Road,” compared with 20% that disagreed.
- A total of 59% of respondents agreed with the statement that “New growth outside of Stockton City Limits should be restricted,” compared with 19% that disagreed.

At the conclusion of the public meetings in 2016, the consultant prepared three land use alternatives. Alternative C (map attached) was described as “relatively dense infill development,” and “At the edges of the city, this scenario would eliminate the “village” concept from the current General Plan, shrink the current Sphere of Influence, and reserve much of the area beyond the city limit for open space and agricultural uses.” (emphasis added)

All of the Council members agreed that the public wants Alternative C and all Council members expressed support for that alternative, not Alternatives A or B, which proposed urban development north of Eight Mile Road. A “Preferred Land Use Alternative” land use map (dated April 17, 2017) was prepared and distributed (attached).

### **From a Tesla Giga Factory to 26,000 Housing Units**

The City Council at their April 4, 2017 workshop on the General Plan talked extensively about the need to reduce unnecessary growth outside of the city limits. The same meeting included a discussion regarding the extraordinary opportunities that could occur if a major user such as a large (500-acre) Tesla-type plant or a Cal State University campus were to be proposed north of Eight Mile Road (or elsewhere in the City).

So, the original concept was for the city to reserve some land for a unique high-paying employment center that needed more acreage than could be accommodated elsewhere in the city. Housing was never discussed as a component of such a job center. Councilman Holman at the end of the April 4 meeting made a motion that was seconded to direct staff to proceed with Alternative C and “add to it to allow us to take advantage of opportunities that occur within the sphere of influence” by adding some language but that it “would not necessarily say we’re going to develop in that area.”

The Planning Commission discussed these issues at your meetings of June 8 and June 22, 2017.

On July 25, 2017, the City Council considered three options prepared by staff to implement an economic development strategy by reserving land north of Eight Mile Road. During the discussion, City planning staff noted argued that the amount of land that would be needed for a Tesla factory or a Cal State campus would be in the range of 500 acres. At this point during the meeting the City Manager jumped in to argue forcefully that although only about 500 acres was needed, he urged the Council to designate the entire Spanos holding of 3,800 acres for a huge job-generator, since that would give maximum flexibility to the city and a potential developer. There was still no talk about allowing housing on the land. The City Council went along with the manager’s request.

Fast forward to July 2018 and the city releases the proposed General Plan and the DEIR. The draft plan defines the newly re-named “Economic and Education Enterprise” land use designation that applies to the Spanos lands and suddenly housing has been added into the equation, as follows:

Development in this designation is intended to support the City’s economic development goals by attracting new businesses, industries, and/or educational institutions that provide

high-quality jobs to the local workforce...Businesses envisioned for this designation include those within a Core Business Cluster industry, as specified in the City's Economic Development Strategic Plan, that provide a significant number of jobs offering wages averaging above Area Median Income, and that cannot be reasonably accommodated elsewhere within the city limit... The designation also allows proximate housing stock that supports the job-generator, including single-family, multi-family, and/or mixed-use dwellings at various levels of affordability, with housing costs that generally correspond to the income levels of the jobs generated by the project....  
(emphasis added) (page 2-14 of the draft General Plan)

The amount of housing that is forecast for the Economic and Education Enterprise zone is quite substantial: 26,710 housing units. This amount of housing planned for the land north of Eight Mile Road (or the potential for any housing at all) was never discussed previously by the City Council or by this Planning Commission. The concept of building more housing at this scale north of Eight Mile Road was certainly never discussed at the public meetings we attended.

### **The DEIR Fails to Analyze Impacts Related to Buildout of 3,800 Acres of Ag Land Designated for “Economic and Education Enterprise”**

The fatal flaw of the DEIR comes in its failure to analyze the environmental impacts of any development of the 3,800 acres north of Eight Mile Road, as well as other development. The DEIR justifies this failure by offering a false distinction between “spatial” and “quantitative” inputs of data. The DEIR notes “analyses that require a quantitative estimate of growth include traffic generation, air pollution emissions, greenhouse gas emissions, noise generation, population growth, and impacts on public services and utilities and recreation.... For these analyses, the horizon-year projection (i.e., the projected amount of development that could occur under the proposed General Plan through its horizon year of 2040) was considered “reasonably foreseeable” and was used in the analysis” (page 3-28).

However, as we will see in the Table 3-3 from the DEIR (attached) and described below, the DEIR assumes that there will be NO development of any kind within the 3,800 acres between now and 2040, so impacts related to these “quantitative” topics are ignored in the DEIR, in violation of CEQA.

In contrast, “analyses that are based on spatial location only include aesthetics, agriculture, exposure to localized air pollution and noise, biological resources, cultural resources, geology, hazards and safety, hydrology and water quality, and land use... For these analyses, the question is not *how much* development the General Plan would allow, but *where* that development could potentially be located. Therefore, all potential development allowed by the land use map of the proposed General Plan was evaluated to assess impacts in these topics (i.e., full buildout of the proposed General Plan)” (page 3-28).

So, the DEIR includes some perfunctory analysis of the “spatial” topics related to development of the 3,800 acres, but the discussion is only limited to these topics.

Table 3-3 in the DEIR (attached) is the key to understanding which development areas in the City plan have been analyzed for the full range of CEQA impacts and which areas have been ignored because projected growth is presumed to not occur until after the year 2040. The table lists the development assumptions for Study Area #1 (Eight Mile Road) in the first row. (The Study Area is defined as the area north of Eight Mile Road, as well as the “Bear Creek” projects area south of Eight Mile Road.)

The table indicates that the total amount of growth that is projected to occur by 2040 in the Eight Mile Road Study Area is 1,380 single family homes, 1,200 multi-family units, and 39,000 square feet of commercial space. According to staff and the DEIR consultant, this amount of growth is assumed to be located in the Bear Creek area south of Eight Mile Road, and that no growth by 2040 is located on the 3,800 acres of Spanos lands north of Eight Mile Road.

However, for the “full buildout” of the plan beyond year 2040, development on the Spanos lands is assumed to include 2,560 single family homes (3,940 minus the Bear Creek homes), a whopping 24,150 multi-family units, 158,000 square feet of commercial space, and over 74 million square feet of “industrial” space (which presumably includes institutional or educational uses).

Notably, assuming 3.23 people per household, the assumption that 26,710 housing units would be constructed north of Eight Mile Road under the full buildout of the plan is equivalent to adding over 86,000 new residents to the city! This DEIR fails to analyze any of the environmental impacts of this amount of new housing growth related to traffic generation, air and greenhouse gas emissions, noise, population growth, and impacts on public services and utilities and recreation.

### **“Piecemealing” a Project Is Not Allowed Under CEQA**

City staff and the consultant have justified the DEIR’s failure to analyze traffic and other impacts for projects assumed not to occur by 2040 (including the 3,800 acres north of Eight Mile Road) by promising that full environmental analysis and mitigation of impacts will be prepared if and when applications are submitted sometime in the future. This “piecemealing” or segmenting of a project and the deferral of environmental analysis is specifically prohibited by the California Environmental Quality Act and more than forty years of case law.

As described by the Association of Environmental Professionals, piecemealing or segmenting means dividing a project into two or more pieces and evaluating each piece in a separate environmental document, rather than evaluating the whole of the project in one environmental document. This is explicitly forbidden by CEQA, because dividing a project into a number of

pieces would allow a Lead Agency to minimize the apparent environmental impacts of a project by evaluating individual pieces separately, each of which may have a less-than- significant impact on the environment, but which together may result in a significant impact. Segmenting a project may also hinder developing comprehensive mitigation strategies.<sup>1</sup>

In essence, this DEIR analysis has arbitrarily divided the buildout of the General Plan into two separate projects: the development that is assumed to occur by 2040, and the remaining development that is expected after that date. The downfall of the DEIR analysis is that the housing growth assumed by 2040 is 41,400 units, which is only one third of the total amount of housing allowed by the General Plan land use map (120,180 units). For non-residential growth, the discrepancy is even larger: only 17% of the 293,311,000 square feet of commercial and industrial is assumed by 2040. Thus, based on the housing projections alone, the traffic, air quality, public services and other environmental impacts of the buildout of the plan are potentially underestimated by two-thirds.

The DEIR must analyze the impacts of the *full* level of residential, commercial, and industrial uses approved by the General Plan. The maximum level of development approved by the General Plan is the project being approved, not a “reasonably foreseeable” year 2040 scenario. Defining and analyzing “the whole of the project” being approved is a long-standing requirement under CEQA. The courts have consistently held that an EIR must examine a project’s potential to impact the environment, even if the development may not ultimately materialize. *Bozung v. Local Agency Formation Com.* (1975) 13 Cal.3d 263, 279, 282.

Because general plans, such as the updated Stockton General Plan, serve as the crucial “first step” toward approval of any particular development project, the EIR must evaluate the amount of development actually allowed by the plan. *City of Carmel-By-the-Sea v. Bd. of Supervisors of Monterey County* (1986) 183 Cal.App.3d 229, 244; *City of Redlands v. County of San Bernardino* (2002) 96 Cal.App.4th 398, 409. Thus, an agency may not avoid analysis of such development merely because historic and projected land use trends indicate that the development might not occur.

In a 2005 case with facts analogous to the present situation, the Placer County Superior Court held that the agency must analyze the full amount of development being approved under a community plan (*Sierra Watch et al. v. Placer County et al.* (Placer County Superior Court No. SCV 16652)). Like the DEIR here, Placer County’s EIR assumed that full build-out of the plan would be unrealistic. The EIR reduced the level of development in the project description to a more “realistic” level that was likely to occur in the plan area. The judge found the project description to be inadequate and held, “The time to study the likely affects of specific and cumulative impacts is at the time that the potential for development is known, whether or not

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<sup>1</sup> Association of Environmental Professionals, CEQA Portal Topic Paper posted at: <https://ceqaportal.org/tp/Project%20Description%2003-23-161.pdf>.



that development actually occurs” (citing *Christward Ministry v. Superior Court* (1986) 184 Cal.App.3d 180, 194; and *Bozung*).

## **A Proposal**

If the city would like to limit its analysis to a predicted amount of growth, it must also limit the allowable development to that lower level by placing restrictions on growth in the general plan itself. To restrict growth to the “reasonably foreseeable” year 2040 scenario, the city could adopt a general plan policy or policies prohibiting additional housing and commercial development beyond the 2040 projections unless a new environmental impact report has been prepared and an amendment to the plan and/or rezoning is adopted.

Over the last eighteen months, we have consistently advocated such an approach to fulfill the city’s desire to set aside land north of Eight Mile Road for a super-job-generator or state university campus. In our letters and in our testimony at the City Council workshop, and again at the Planning Commission in 2017, we explicitly note that we are not opposed to consideration of an “extraordinary” opportunity on lands north of Eight Mile Road. Last year, we recommended that the new General Plan could include a policy that recognizes this opportunity:

“The City will consider future amendments to the General Plan for extraordinary growth plans outside the Urban Services Boundary that include significant job generators or public institutions such as a college campus.”

## **Conclusion**

We will continue to insist that the city approve an updated General Plan and accompanying environmental impact report in conformance with State law. We have offered ample evidence that the existing DEIR, in its current form, does not meet the requirements of the California Environmental Quality Act. The city must direct staff and the consultant to modify the draft plan and the DEIR to meet the State mandate for full disclosure of all impacts and recommend specific measures for all growth allowed under this General Plan, not just some of it.

We noted last year, and reiterate once again, we are totally opposed to any attempt by staff or others to back off the previous commitment by the city to designate the lands north Eight Mile Road for Agriculture/Open Space uses, and instead propose massive amounts of housing. We are opposed to a designation of any of these lands as “Economic and Education Enterprise,” with no meaningful policies or restrictions on developing the land prematurely.

The lack of any specific policies that guide the development of lands north of Eight Mile Road leave a huge loophole in this General Plan that could be exploited by future City Councils. For example, a future Council could approve thousands of units of housing with the promise that a major job generator is about to commit to build in the area. There is nothing in this plan that would restrict the Spanos organization from applying for single or multiple family housing in the

next five years. There is nothing that would preclude the Spanos group from applying to expand the existing Spanos West subdivisions north of Eight Mile Road.

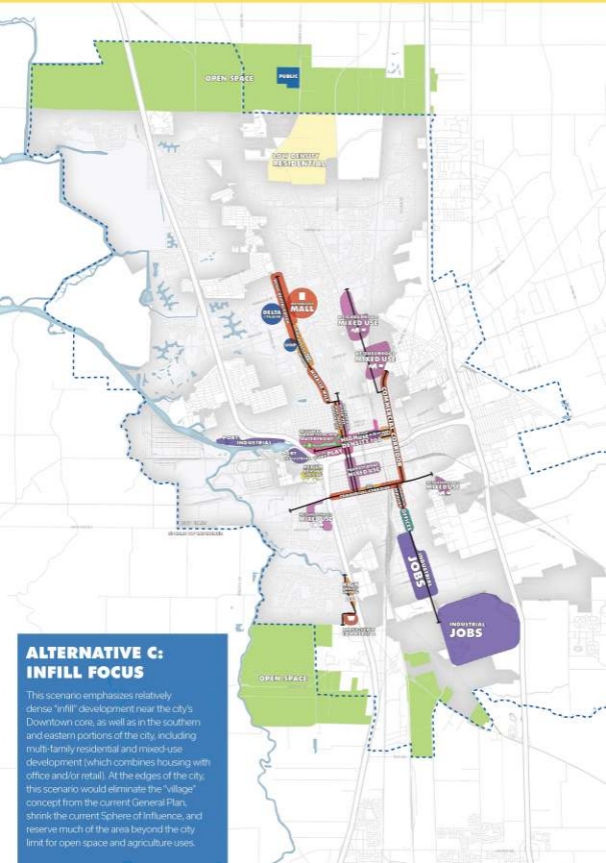
We are disappointed that we have come so far from the last disastrous General Plan yet we still are encountering these last minute manipulations to add housing north of Eight Mile Road, which has received no meaningful public review and discussion.

Thank you for your consideration of these important matters. We look forward to much more discussion and debate about these issues.

Very truly yours,

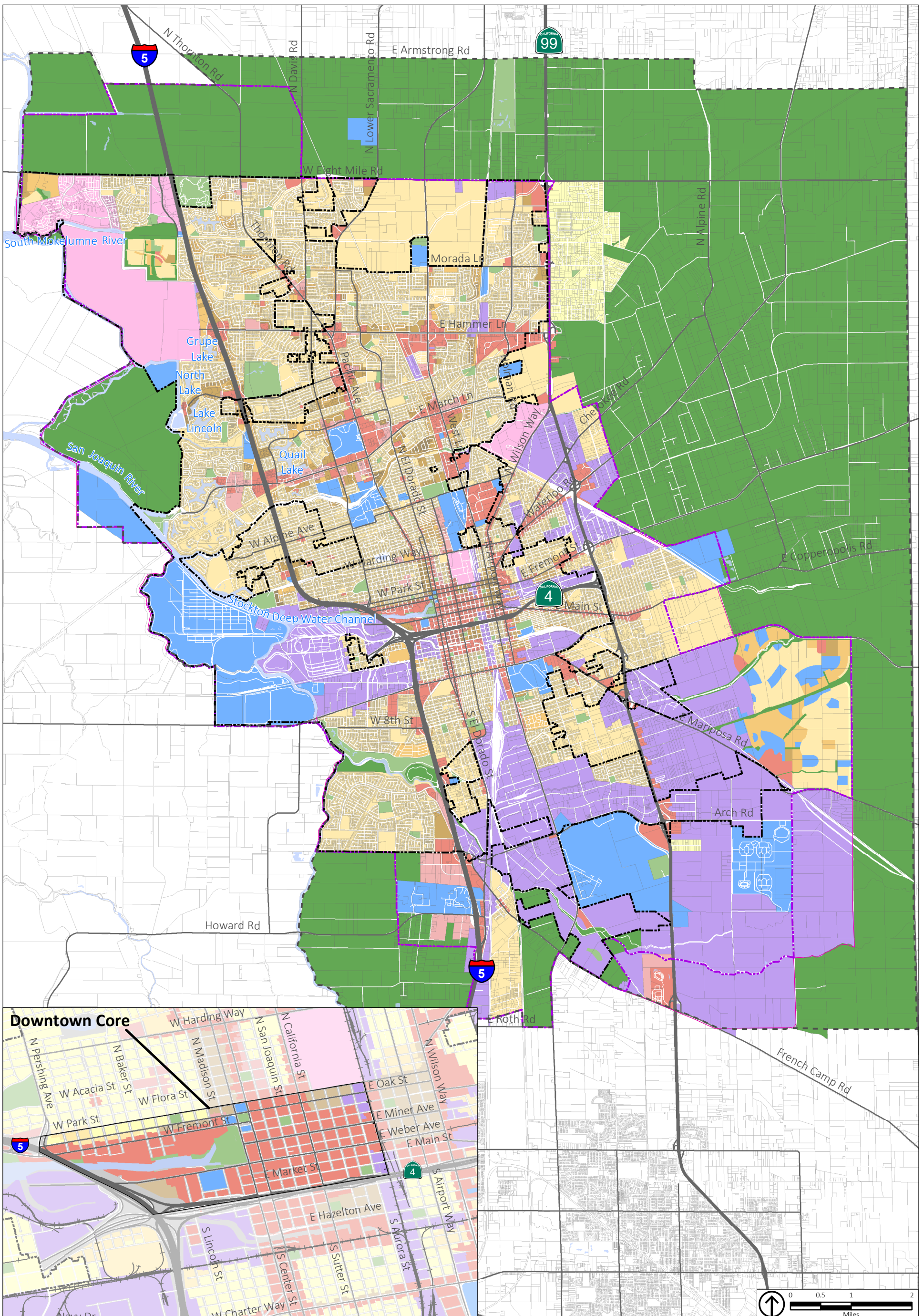
ss/Eric Parfrey  
Chair, CCG and  
Chair, Sierra Club California Executive Committee

cc: Stockton City Council  
Andrew Chesley, SJCOG  
SJ County Board of Supervisors  
State Attorney General  
Rachel Hooper, Shute, Mihaly, Weinberger



## ALTERNATIVE C: INFILL FOCUS

This scenario emphasizes relatively dense "infill" development near the city's Downtown core, as well as in the southern and eastern portions of the city, including multi-family residential and mixed-use development (which combines housing with office and/or retail). At the edges of the city, this scenario would eliminate the "village" concept from the current General Plan, shrink the current Sphere of Influence, and reserve much of the area beyond the city limit for open space and agriculture uses.

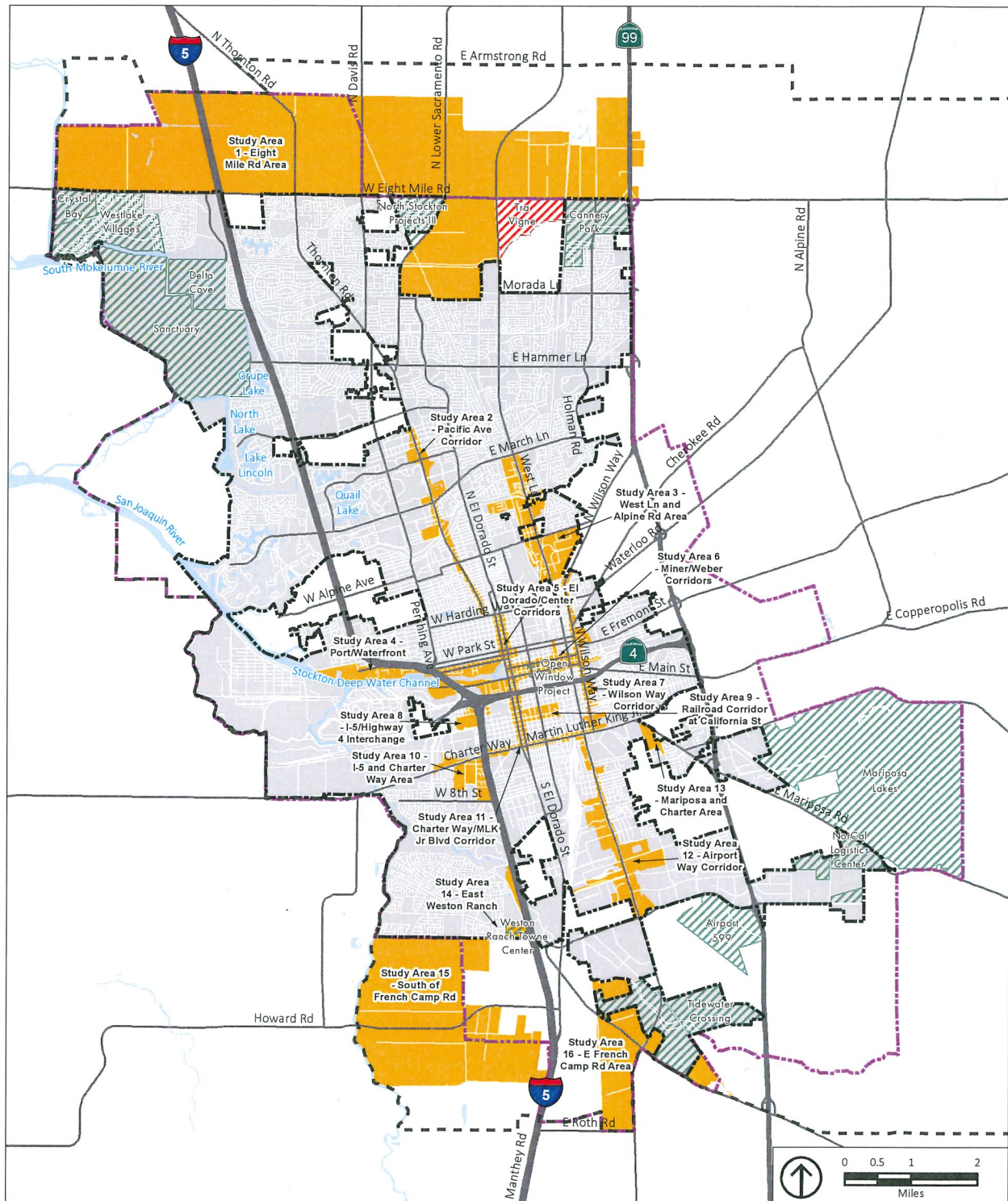


Source: City of Stockton, 2017; PlaceWorks, 2017.

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|----------------------------|-----------------------------|------------------------|----------------------------|
| Residential Estate         | Village                     | Industrial             | General Plan Planning Area |
| Low Density Residential    | Mixed Use                   | Institutional          | Sphere of Influence        |
| Medium Density Residential | Commercial                  | Parks and Recreation   | Urban Service Area         |
| High Density Residential   | Administrative Professional | Open Space/Agriculture | City Limit                 |

DRAFT - APRIL 17, 2017  
 Preferred Land Use Alternative

### PROJECT DESCRIPTION



Source: City of Stockton, 2016; Placeworks, 2017.

- Study Areas
- City Limit
- Major Development Projects**
- Active/Pending Applications
- Sphere of Influence/ EIR Study Area
- Approved Projects
- General Plan Planning Area

Figure 3-5

Study Areas and Approved/Pending Projects

**PROJECT DESCRIPTION**

**TABLE 3-3 2040 DEVELOPMENT BY STUDY AREA**

Study Area #/Name	Net New Single-Family Units (Full Buildout)	Percent Applied to 2040	Net New Single-Family Units (2040)	Net New Multi-Family Units (Full Buildout)	Percent Applied to 2040	Net New Multi-Family Units (2040)	Net New Commercial Square Feet (Full Buildout)	Percent Applied to 2040	Net New Commercial Square Feet (2040)	Net New Industrial Square Feet (Full Buildout)	Percent Applied to 2040	Net New Industrial Square Feet (2040)
1. Eight Mile Rd	3,940	35%	1,380	25,350	5%	1,200	197,000	20%	39,000	74,095,000	0%	0
2. Pacific Ave Corridor	0	0%	0	440	25%	110	188,000	50%	94,000	0	0%	0
3. West Ln and Alpine Rd	80	100%	80	2,720	25%	680	1,294,000	25%	323,000	0	0%	0
4. Port/Waterfront	20	100%	20	2,210	80%	1,770	6,800,000	30%	2,040,000	2,323,000	25%	581,000
5. El Dorado/Center Corridors	0	0%	0	1,500	80%	1,200	4,367,000	30%	1,310,000	0	0%	0
6. Miner/Weber Corridors <sup>a</sup>	0	0%	0	1,560	80%	1,250	2,926,000	50%	1,463,000	0	0%	0
7. Wilson Way Corridor	0	0%	0	940	25%	230	1,213,000	50%	607,000	0	0%	0
8. I-5/Highway 4 Interchange	0	0%	0	820	80%	660	777,000	50%	389,000	0	0%	0
9. Railroad Corridor at California St	0	0%	0	1,680	80%	1,340	5,197,000	25%	1,299,000	0	0%	0
10. I-5 and Charter Way	90	100%	90	980	10%	100	535,000	25%	134,000	98,000	85%	84,000
11. Charter Wy/MLK Jr Blvd Corridor	0	0%	0	790	50%	400	1,619,000	20%	324,000	0	0%	0
12. Airport Way Corridor	0	0%	0	430	25%	110	274,000	75%	205,000	5,475,000	25%	1,369,000
13. Mariposa and Charter	0	0%	0	570	0%	0	324,000	25%	81,000	0	0%	0
14. East Weston Ranch <sup>b</sup>	0	0%	0	610	0%	0	574,000	75%	431,000	0	0%	0
15. South of French Camp Rd	0	0%	0	0	0%	0	0	0%	0	0	0%	0
16. E French Camp Rd	0	0%	0	0	0%	0	0	0%	0	0	0%	0
Outside of Study Areas <sup>c</sup>	16,360	9%	1,500	29,810	0%	0	19,487,000	0%	0	126,805,000	0%	0
<b>Grand Total<sup>d</sup></b>	<b>20,480</b>		<b>3,060</b>	<b>70,400</b>		<b>9,040</b>	<b>45,773,000</b>		<b>8,739,000</b>	<b>208,796,000</b>		<b>2,033,000</b>

a. Excludes Open Window approved project.  
 b. Excludes Weston Ranch Town Center approved project.  
 c. Excludes approved/pending projects.  
 d. Numbers do not always add up due to rounding.  
 Source: PlaceWorks, 2017.

## PROJECT DESCRIPTION

- **Approved and Pending Development Projects.** As noted above in Section 3.5.2, there is significant development potential available in approved development projects that have not yet been constructed. Such projects can continue to be developed regardless of whether the City adopts the proposed General Plan. The development allowed in those approved projects, as well as development proposed in pending development projects, is included in the horizon-year projection, and was considered as part of the process to distribute the planning period development. Given the significant amount of development potential in those projects, the horizon-year projection includes more non-residential development than forecasted by the market study described above. The approved and pending development that was considered in this EIR is shown in Table 3-4.

**TABLE 3-4 NET NEW APPROVED AND PENDING DEVELOPMENT**

	Single-Family Units	Multi-Family Units	Commercial Square Feet	Industrial Square Feet
<b>Approved Within City Limit</b>				
Westlake Villages	2,600	0	0	0
Delta Cove	1,200	400	31,000	0
North Stockton Projects III	2,200	0	0	0
Cannery Park	1,000	200	1,079,000	1,442,000
Nor Cal Logistics Center	0	0	0	6,280,000
Crystal Bay	1,000	400	0	0
Sanctuary	5,500	1,600	692,000	0
Tidewater Crossing	0	0	186,000	11,625,000
Open Window <sup>a</sup>	0	1,400	0	57,000
Weston Ranch Town Center	0	0	481,000	0
<b>Approved/Pending Outside City Limit, Inside SOI</b>				
Mariposa Lakes	9,000	1,600	1,010,000	11,980,000
Airpark 599	0	0	1,679,000	2,200,000
Tra Vigne <sup>b</sup>	1,200	0	0	0

a. The Master Development Plan for Open Window is approved for 1,034 units, with an option to expand the capacity to 1,400 units if the General Plan Update increases the maximum densities in the Downtown, which is proposed as part of the General Plan Update.

b. Pending; not approved.

Source: City of Stockton and PlaceWorks, 2017.

As part of this step, the 2008 Settlement Agreement between the City, State, and Sierra Club, which was signed in response to litigation over the 2007 adoption of the City's General Plan, was consulted. The Settlement Agreement requires the City to plan for 4,400 housing units in the Greater Downtown and an additional 14,000 units within the city limit as it existed in 2008. Therefore, the 2040 development was