

**From:** [Gross, Morgan@DOT](mailto:Gross.Morgan@DOT) on behalf of [D3 Local Development@DOT](mailto:D3.Local.Development@DOT)  
**To:** [Ron Bess](mailto:Ron.Bess)  
**Subject:** RE: Notice of Availability/Intent to Adopt the 6325 Stockton Boulevard Project (P23-014)  
**Date:** Tuesday, May 6, 2025 9:04:00 AM

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Good morning Ron,

Thank you for including the California Department of Transportation (Caltrans) in the review process of the proposed 6325 Stockton Boulevard Project (P23-014). We wanted to reach out and let you know we have no comments at this time.

Please provide our office with copies of any further actions regarding this project as we would appreciate the opportunity to review and comment on any changes related to this project.

Should you have questions regarding these comments or require additional information, please contact me by phone (530) 720-2778 or via email at [D3.local.development@dot.ca.gov](mailto:D3.local.development@dot.ca.gov).

Thank you!

**Morgan Gross**

Transportation Planner | Local Development Review and Complete Streets  
Division of Planning, Local Assistance, and Sustainability  
Caltrans, District 3  
Phone: (530) 720-2778  
Email: [morgan.gross@dot.ca.gov](mailto:morgan.gross@dot.ca.gov)

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**From:** Ron Bess <[RBess@cityofsacramento.org](mailto:RBess@cityofsacramento.org)>  
**Sent:** Friday, May 2, 2025 1:06 PM  
**To:** Daniel Abbes <[DAbbes@cityofsacramento.org](mailto:DAbbes@cityofsacramento.org)>; Marcus Adams <[MAdams@cityofsacramento.org](mailto:MAdams@cityofsacramento.org)>  
**Cc:** Scott Johnson <[SRJohnson@cityofsacramento.org](mailto:SRJohnson@cityofsacramento.org)>; Charles Tschudin <[ctschudin@cityofsacramento.org](mailto:ctschudin@cityofsacramento.org)>; Ron Bess <[RBess@cityofsacramento.org](mailto:RBess@cityofsacramento.org)>  
**Subject:** Notice of Availability/Intent to Adopt the 6325 Stockton Boulevard Project (P23-014)

**EXTERNAL EMAIL.** Links/attachments may not be safe.

Good Afternoon,

This email is to inform you that the City of Sacramento, Community Development Department, as Lead Agency, has issued a **Notice of Availability/Intent to Adopt the 6325 Stockton Boulevard Project (P23-014)**.

**The Comment Period is from May 2, 2025, to May 22, 2025.**

The documents are now available for public review and comment. The NOA/NOI is available, along with the Mitigated Negative Declaration and Appendices at the City's Community Development Department webpage located at:

<https://www.cityofsacramento.gov/community-development/planning/environmental/impact-reports>

Comments are invited from all interested parties. Written comments on the Mitigated Negative Declaration should be submitted to the following address **NO LATER THAN 4:00 pm on Thursday, May 22, 2025**. All comments should be submitted via email or mailed to:

Ron Bess, Associate Planner  
City of Sacramento  
Community Development Department  
Environmental Planning Services  
300 Richards Blvd. 3<sup>rd</sup> Floor  
Sacramento, CA 95811  
[Rbess@cityofsacramento.org](mailto:Rbess@cityofsacramento.org)

Thank You.



**Yana Garcia**  
Secretary for  
Environmental Protection



**Department of Toxic Substances Control**

Katherine M. Butler, MPH, Director  
8800 Cal Center Drive  
Sacramento, California 95826-3200  
[dtsc.ca.gov](http://dtsc.ca.gov)



**Gavin Newsom**  
Governor

**SENT VIA ELECTRONIC MAIL**

May 16, 2025

Ron Bess  
Associate Planner  
City of Sacramento, Community Development Department  
300 Richards Boulevard, Third Floor  
Sacramento, CA 95811  
[RBess@cityofsacramento.org](mailto:RBess@cityofsacramento.org)

RE: MITIGATED NEGATIVE DECLARATION FOR 6325 STOCKTON BOULEVARD  
MIXED-USE PROJECT DATED May 2, 2025, STATE CLEARINGHOUSE NUMBER  
[2025050127](#)

Dear Ron Bess,

The Department of Toxic Substances Control (DTSC) reviewed the Mitigated Negative Declaration (MND) for the 6325 Stockton Boulevard Mixed-Use Project (Project). The proposed Project would include the removal of all on-site structures and trees, and the development of two, three-story residential buildings with 24 units in each for a total of 48 apartment units, a car wash station, an oil change facility. The proposed Project would include 86 parking spaces throughout the Project site. Partner's Phase II Subsurface Investigation Report (SIR) revealed methylene chloride impacting soil gas initially exceeded the commercial/industrial screening levels. An additional Tier 2 Evaluation found they were within the commercial/industrial thresholds, however there is no mention of residential screening levels. Since the proposed Project will have residential use and Partner's SIR tested for commercial/industrial use, DTSC recommends and requests consideration of the following comments:

1. The analysis within the MND should reflect residential screening levels as the Phase I Environmental Site Assessment and Phase II SIR only analyzed screening levels to commercial / industrial thresholds.
2. The City of Sacramento address contamination found to be present within the Project area through oversight from a [self-certified local agency](#), DTSC or Regional Water Quality Control Board. If entering into one of DTSC's voluntary agreements, please note that DTSC uses a single standard Request for Lead Agency Oversight Application for all agreement types. Please apply for DTSC oversight using this link: [Request for Agency Oversight Application](#). Submittal of the online application includes an agreement to pay costs incurred during agreement preparation. If you have any questions about the application portal, please contact the relevant [Regional Brownfield Coordinator](#) for your Project.
3. All imported soil and fill material should be tested to assess any contaminants of concern meet screening levels as outlined in [DTSC's Preliminary Endangerment Assessment Guidance Manual](#). Additionally, DTSC advises referencing the [DTSC Information Advisory Clean Imported Fill Material Fact Sheet](#) if importing fill is necessary. To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of prior land use. Additional information can be found by visiting [DTSC's Human and Ecological Risk Office \(HERO\) webpage](#).

DTSC would like to thank you for the opportunity to comment on the MND for the 6325 Stockton Boulevard Mixed-Use Project. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like clarification on DTSC's comments, please respond to this letter or via our [CEQA Review email](#) for additional guidance.

Ron Bess  
May 16, 2025  
Page 3

Sincerely,

*Tamara Purvis*

Tamara Purvis  
Associate Environmental Planner  
HWMP - Permitting Division – CEQA Unit  
Department of Toxic Substances Control  
[Tamara.Purvis@dtsc.ca.gov](mailto:Tamara.Purvis@dtsc.ca.gov)

cc: (via email)

Governor's Office of Land Use and Climate Innovation  
State Clearinghouse  
[State.Clearinghouse@opr.ca.gov](mailto:State.Clearinghouse@opr.ca.gov)

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May 22, 2025

Ron Bess, Associate Planner  
City of Sacramento Community Development Department  
300 Richards Boulevard, 3<sup>rd</sup> Floor, Sacramento, CA 95811

**Subject: 6325 Stockton Boulevard Mixed Use Project (State Clearinghouse #2025050127)**

Dear Ron Bess:

Thank you for providing the Sacramento Metropolitan Air Quality Management District (Sac Metro Air District) with the opportunity to review the [Mitigated Negative Declaration \(MND\) for the 6325 Stockton Boulevard Mixed Use Project](#) under the California Environmental Quality Act (CEQA). This project includes the removal of all on-site structures and trees, the development of two three-story residential buildings with 24 units in each for a total of 48 apartment units, a car wash station, an oil change facility, a playground/greenspace area for resident use, and 86 motor vehicle parking spaces. Sac Metro Air District offers the project comments below, on air quality and climate considerations for project implementation and CEQA review consistent with methods recommended in our [Guide to Air Quality Assessment in Sacramento County](#) (CEQA Guide), available on our website.

### **Project Routing**

The only project that Sac Metro Air District has reviewed on the 6325 Stockton Boulevard site was a carwash without residential uses that was distributed in September 2023, and we understand that a subsequent project routing was distributed in August 2024, which included residential uses. Further, this MND was circulated on May 2 with a due date of May 22. For these reasons, we do ask for your patience with any oversights in this letter.

### **CAAP Consistency**

The MND contends that the proposed project is consistent with the [City of Sacramento Climate Action & Adaptation Plan](#) (CAAP) and therefore would have less than significant impacts on global climate change. The discussion on CAAP consistency (page 57) largely references the project's all-electric construction. There are many other elements of CAAP consistency that would apply to the project, for example CAAP policies and actions that support sustainable modes of transportation such as transit. To fully demonstrate CAAP consistency, the MND should reference other elements of CAAP consistency that would apply to the project.

In our September 2023 letter on the previously routed project on this site, Sac Metro Air District noted that the proposed car wash, as an automobile-oriented use, would not be supportive of Sacramento Regional Transit's plans for high frequency transit along the Stockton Boulevard Corridor. As noted, sustainable transportation such as transit is key to implementing state and regional plans to reduce polluting motor vehicle emissions, including the Sacramento region's [Metropolitan Transportation Plan](#) and Sac Metro Air District's [Sacramento Regional Ozone Attainment Plan and other plans for meeting](#)

[federal and state air quality standards](#). Support for sustainable transit would also be supportive of the CAAP, as referenced above.

- Sac Metro Air District recommends including project measures consistent with [Sac Metro Air District's performance-based greenhouse gas thresholds for CEQA significance](#). This inclusion would further support the MND's determination of less than significant global climate change impacts. Specifically, in addition to the project's all-electric construction, we recommend that it meet the current [CalGreen](#) Tier 2 electric vehicle (EV) infrastructure standards, except that all EV Capable spaces called for in those standards instead be EV Ready.

#### **Public Toxic Air Contaminant Exposure from Project Construction**

MND Tables 4 and 6 show cancer risk and hazard index associated with unmitigated and mitigated project construction emissions, respectively, using the [Sac Metro Air District thresholds of significance](#) for public exposure to toxic air contaminants from stationary sources, rather than a range of sources such as mobile construction equipment. We do not have a threshold of significance for public exposure to mobile sources of toxic air contaminants, and while *we accept your analysis method and the use of stationary source threshold is not inappropriate here*, it is important to note that the threshold is intended for use with stationary sources only.

- Please include clarification in the final MND that the threshold is intended for use in assessing health risk from stationary sources.
- Further, the sources identified for the information provided in Table 4 and 6 are [AERMOD](#) and [HARP 2](#) RAST, and Sac Metro Air District recommends including into MND appendices the modeling inputs and outputs that resulted in the information provided in Tables 4 and 6, to provide full, clear public disclosure of project public health effects. We could not find modeling runs for HARP 2 RAST or AERMOD in MND appendices.
- MND mitigation measure III-2 calls for use of [Tier 4](#) construction equipment where equipment is greater than 100 horsepower, and Sac Metro Air District recommends that this measure call for use of Tier 4 construction equipment where equipment is greater than 50 horsepower. This would be consistent with the Portable Equipment Registration Program requirements cited in mitigation measure III-2 and with [Sac Metro Air District's Enhanced On-Site Exhaust Controls](#), which require NOx reductions in off road construction equipment in equipment 50 horsepower or more. NOx emissions can be significantly reduced by using Tier 4 engines in the 50 to 100 horsepower range.

#### **Idling Vehicles**

Because the car wash will result in idling vehicles near residential uses and a playground, for project landscaping please consider using vegetation species selected from those recommended in our [Landscaping Guidance for Improving Air Quality Near Roadways](#) (Landscaping Guidance). The Landscaping Guidance, available on our website, provides specific recommendations on using vegetation to reduce public health impacts from motor vehicle emissions, including the selection, placement, planting, and care of tree and shrub species on project sites. Trees and shrubs from the Landscaping Guidance should be planted where they can best serve as a buffer between residential uses

and the car wash, for example along the north boundary of the project residential units and playground, and along the project's eastern boundary, which abuts residential uses.

**Demolition**

As a reminder, due to the health risks posed by public exposure to asbestos, demolition and renovation of existing buildings is subject to Sac Metro Air District Rule 902, to limit asbestos exposure during these activities. Sac Metro Air District staff is available to review notifications and answer asbestos related questions, either by emailing [asbestos@airquality.org](mailto:asbestos@airquality.org), or calling 279-207-1122.

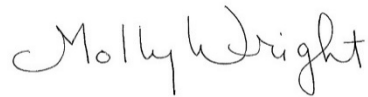
**Construction Rules**

All projects are subject to Sac Metro Air District rules and regulations in effect at the time of construction. Please visit our website to [find a list of the most common rules that apply at the construction phase of projects](#).

**Conclusion**

Thank you for your attention to our comments. If you have questions about them, please contact me at [mwright@airquality.org](mailto:mwright@airquality.org) or 279-207-1157.

Sincerely,



Molly Wright, AICP  
Air Quality Planner / Analyst

c: Rich Muzzy, Program Supervisor, Sac Metro Air District