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March 8, 2019

Governor's Office of Planning & Research

Mr. Giuseppe Sanfilippo
Associate Planner
San Joaquin County
1810 E Hazelton Avenue
Stockton, CA 95205

MAR 08 2019

STATE CLEARINGHOUSE

Subject: City of Stockton PA-1800043, Gas Station and Convenience Store Notice of Completion (NOC) and Initial Study Mitigated Negative Declaration (ISMND) Environmental Document Transmittal, SCH No. 2019029031

Dear Mr. Sanfilippo:

Thank you for the opportunity to review and comment on the City of Stockton's California Environmental Quality Act (CEQA) Notice of Completion (NOC) and Initial Study Mitigated Negative Declaration (ISMND) for PA-1800043, a gas station and convenience store project proposed by Ms. Janet Blincoe. Since one of the areas the California Governor's Office of Emergency Services (Cal OES) provides community support is disaster response and recovery, our review and comment focuses on whether the potential project impacts address relevant topics such as wildfires and flooding.

Although relatively new, the 2019 CEQA Environmental Checklist Form includes Wildfire and Energy topics to be evaluated as "Environmental Factors Potentially Affected" in view of California's recent wildfire disasters. Therefore, I recommend utilizing the updated Checklist Form. Further, it appears the Environmental Checklist used for the subject project is abridged addressing only 16 of 21 required topics. The topics that appear omitted include: Agriculture & Forestry, Greenhouse Gas Emissions, Minerals, Recreation and Tribal Cultural Resources

In addition, the 2019 CEQA Environmental Checklist Form is inclusive of the following four selections to categorize the estimated project impacts to the environment: "Potentially Significant Impact," "Less than Significant Impact with Mitigation Incorporated," "Less than Significant Impact," and "No Impact." Instead, a binary "Yes/No" selection was used to indicate whether an impact could occur for an environmental topic in the Checklist, rather than addressing the multiple questions for each environmental topic. In fact, for the 16 environmental topics used, the determination "no" was selected for each. I recommend the 2019 CEQA Environmental Checklist Form be used in which the four standard questions to characterize potential impacts be used.

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The "Water" section of the ISMND, which may be a substitute for the standard "Hydrology & Water Quality" section, indicates the project will include three underground storage tanks (UST) in a flood zone, although omitted from the Project Description. The size of the USTs, the contents (i.e., gasoline or diesel), and depth below surface grade are unspecified in this section and the Project Description. However, the Checklist and text suggest no or less than significant impact to "waters." I recommend the construction activities, size and depth of the USTs be described in this and other sections of the ISMND. With special note, since the project will involve excavation, that when performed, may unearth cultural and archaeological remains in this historical riparian area proximate to Duck Creek, I also recommend the omitted Tribal Cultural Resources and the Cultural Resources section be expanded to include the results of a Cultural Historical Resource Information System (CHRIS) report.

As you may be aware, the project area is located in an area proximate to the Duck Creek and Mormon Slough waterways, which were recently impacted by flooding. The latter was subject of studies by the U.S. Army Corps of Engineers (in 2013 and 2017). Therefore, I recommend the "Water" section of the ISMND be developed to fully address the surface waterways and potential risks of flooding and release of fossil fuels from the proposed USTs.

State planning law includes a requirement for consultations with state agencies with regard to information related to hazards. Upon request, Cal OES will share all available information relevant to the City of Stockton.

If you have any questions about these comments, please contact me at (916) 823-1945 or patricia.nelson@caloes.ca.gov.

Sincerely,



Patricia Nelson
Environmental Officer

cc: State Clearinghouse



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