



Appendix D: Draft Section 4(f) and Section 6(f) Evaluation



This page is intentionally left blank.



D.1 Introduction

This appendix describes the Stockton Diamond Grade Separation Project's (Project) compliance with the provisions of 49 USC Section 303 of the U.S. Department of Transportation (USDOT) Act of 1966—hereafter referred to as Section 4(f)—and the Land and Water Conservation Fund (LWCF) Act of 1965—hereafter referred to as Section 6(f). This appendix describes the regulatory requirements associated with Section 4(f) and with Section 6(f) and identifies all properties protected by these regulations in the proposed Project Study Area. Determinations to comply with Section 4(f) and Section 6(f) are made following an evaluation of potential uses of these properties per Section 4(f) and land conversion per Section 6(f) with implementation of the proposed Project.

D.1.1 SECTION 4(F)

Section 4(f) of the USDOT Act of 1966, codified in federal law at 49 United States Code 303, declares that "...it is the policy of the United States Government that special effort should be made to preserve the natural beauty of the countryside and public park and recreation lands, wildlife and waterfowl refuges, and historic sites."

Section 4(f) specifies that the Secretary of Transportation may approve a transportation program or project:

"... requiring the use of publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, state, or local significance, or land of an historic site of national, state, or local significance (as determined by the federal, state, or local officials having jurisdiction over the park, area, refuge, or site) only if:

- There is no prudent and feasible alternative to using that land; and
- The program or project includes all possible planning to minimize harm to the park, recreation area, wildlife and waterfowl refuge, or historic site resulting from the use."

In certain instances, Section 4(f) further requires consultation with the United States Department of the Interior and, as appropriate, the United States Departments of Agriculture and Housing and Urban Development in developing transportation projects and programs that use lands protected by Section 4(f). If historic sites are involved, then coordination with the State Historic Preservation Officer is also needed in certain instances.

Section 4(f) Definitions

According to the Section 4(f) Policy Paper (FHWA 2012) and 23 Code of Federal Regulations (CFR) 774.17, a use of land from a Section 4(f) property is determined by the Federal Highway Administration (FHWA) to occur: (a) "... when land is permanently incorporated into a transportation facility ...," (b) "... when there is a temporary occupancy of land that is adverse in terms of the statute's preservation purposes ...," or (c) "... when there is a constructive use of a Section 4(f) property as determined by the criteria in (23 Code of Federal Regulations [CFR]) section 774.15."



Permanent Incorporation: Land will be considered permanently incorporated into a transportation facility when it has been purchased as right-of-way or when the applicant for federal-aid funds has acquired a sufficient property interest for the purpose of Project implementation.

Temporary Occupancy: During construction activities, a temporary occupancy is considered a Section 4(f) use if the Section 4(f) property is subjected to adverse temporary or permanent changes and/or if there is a disruption to the facilities or activities of the Section 4(f) property.

However, according to Section 23 CFR 774.13(d), temporary occupancies of land are exempt from Section 4(f) approvals when they are so minimal as to not constitute a use within the meaning of Section 4(f). For the temporary occupancies of land use exemption to apply, the following conditions must be satisfied:

- 1) Duration must be temporary (i.e., less than the time needed for construction of the project), and there should be no change in ownership of the land
- 2) Scope of the work must be minor, (i.e., both the nature and the magnitude of the changes to the Section 4(f) property are minimal)
- 3) There are no anticipated permanent adverse physical impacts, nor will there be interference with the protected activities, features, or attributes of the property, on either a temporary or permanent basis
- 4) The land being used must be fully restored (i.e., the property must be returned to a condition which is at least as good as that which existed prior to the project); and
- 5) There must be documented agreement of the official(s) with jurisdiction over the Section 4(f) resource regarding the above conditions

In situations where the above criteria cannot be met, the temporary occupancy will be a use of Section 4(f) property and the appropriate Section 4(f) analysis, coordination, and documentation will be required. In those cases where a temporary occupancy constitutes a use of Section 4(f) property and the *de minimis* impact criteria are also met, a *de minimis* impact finding may be made. A *de minimis* impact findings should not be made in temporary occupancy situations that do not constitute a use of Section 4(f) property.

Constructive Use: Constructive use involves no actual physical use of the Section 4(f) and is only possible in the absence of a permanent incorporation of land or a temporary occupancy of the type that constitutes a Section 4(f) use. Constructive use occurs when the proximity impacts of a project on an adjacent or near-by Section 4(f) property, after incorporation of impact mitigation (e.g., noise, vibration, visual, access, ecological) are so severe that the activities, features, or attributes that qualify the property for protection under Section 4(f) are substantially impaired. Substantial impairment occurs when the protected activities, features, or attributes of the Section 4(f) property are substantially diminished.



De Minimis Impact: According to the Section 4(f) Policy Paper (FHWA 2012) and Section 23 CFR 774.17(5), a *de minimis* impact is one that, after taking into account any measures to minimize harm (such as avoidance, minimization, mitigation or enhancement measures), results in either of the following:

- For historic sites, *de minimis* impact means that the Administration (CHSRA) has determined, in accordance with 36 CFR part 800, that no historic property is affected by the project or that the project will have “no adverse effect” on the historic property in question.

Per CFR 774.5 (b)(1), prior to making *de minimis* impact determinations under §774.3(b), the following coordination shall be undertaken for historic properties:

- The consulting parties identified in accordance with 36 CFR part 800 must be consulted
 - The Administration (CHSRA) must receive written concurrence from the pertinent State Historic Preservation Officer (SHPO) or Tribal Historic Preservation Officer (THPO), and from the Advisory Council on Historic Preservation (ACHP), if participating in the consultation process, for a finding of “no adverse effect” or “no historic properties affected” in accordance with 36 CFR part 800. The Administration (CHSRA) shall inform these officials of its intent to make a *de minimis* impact determination based on their concurrence in the finding of “no adverse effect” or “no historic properties affected.”
- For parks, recreation areas, and wildlife and waterfowl refuges, a *de minimis* impact is one that will not adversely affect the features, attributes, or activities qualifying the property for protection under Section 4(f).

Per CFR 774.5 (b)(2), prior to making *de minimis* impact determinations under §774.3(b), the following coordination shall be undertaken for parks, recreation areas, and wildlife and waterfowl refuges:

- Public notice and an opportunity for public review and comment concerning the effects on the protected activities, features, or attributes of the property must be provided. This requirement can be satisfied in conjunction with other public involvement procedures, such as a comment period provided on a NEPA document.
- The Administration (CHSRA) shall inform the official(s) with jurisdiction of its intent to make a *de minimis* impact finding. Following an opportunity for public review and comment, as described in paragraph (b)(2)(i) of this section, the official(s) with jurisdiction over the Section 4(f) resource must concur in writing that the project will not adversely affect the activities, features, or attributes that make the property eligible for Section 4(f) protection. This concurrence may be combined with other comments on the project provided by the official(s).

While *de minimis* is generally applied where there is a permanent incorporation of land, if a temporary occupancy of a Section 4(f)-protected property during construction does not meet the conditions required for the temporary occupancy exception of use under Section 774.13(d), it may be possible to make a *de minimis* impact determination.



D.1.2 SECTION 6(F) OF THE LAND AND WATER CONSERVATION FUND ACT REGULATIONS

State and local governments often obtain grants through the LWCF Act to acquire or make improvements to parks and recreation areas. Section 6(f) of the LWCF Act prohibits the conversion of any property acquired or developed with these grants a non-recreational purpose without the approval of the National Park Service (NPS). Section 6(f) requires NPS to make certain that replacement lands of comparable value and function or monetary compensation (used to enhance the remaining land), location, and usefulness are provided as conditions to such conversions.

The Project team consulted the California Department of Parks and Recreation's database of funded projects from 1964 through 2019 and identified 15 parks funded in whole or in part by LWCF grants located in the City of Stockton. The nearest park subject to a Section 6(f) analysis is located a little over 0.5-mile south of the proposed Project constriction limits¹. There are no recreational lands or facilities funded through the LWCF in the RSA; therefore, Section 6(f) is not applicable to the proposed Project and will not be discussed further in this Appendix or EA.

D.1.3 SECTION 4(F) APPLICABILITY

According to the Section 4(f) Policy Paper (FHWA 2012), a park or recreational area qualifies for protection under Section 4(f) if it is:

- Publicly owned at the time at which the use occurs
- Open to the general public
- Being used for recreation
- Considered significant by the OWJ
- A publicly owned recreation property designated in a formal plan
- A public school with a joint-use agreement for public recreation use of the school grounds or recreation facilities
- Private schools with a joint-use agreement for public recreation use of the school grounds or recreation facilities

It is important to note that some of the conditions listed above would require OWJ to consider such resource significant. This would be applicable to public parks, but not necessarily to public schools with public recreational facilities.

According to the Section 4(f) Policy Paper (FHWA 2012), section 4(f) does not apply in the following circumstances:

¹ California Department of Parks and Recreation. 2021. "Land and Water Conservation Fund." Accessed May 2021. https://www.parks.ca.gov/?page_id=21360



- Publicly owned facilities whose major purpose is for commercial reasons, such as professional sport or music venues, rather than for park or recreation purposes
- Land that is privately owned, even if it is designated in a formal plan
- Where no joint use agreement for use of public or private school recreational facilities exists
- Publicly owned facilities where park, recreational, or refuge activities would be incidental, secondary, occasional, or dispersed
- Publicly owned land or facilities whose major purpose, as described by the agency with jurisdiction, is transportation, even when recreational activities may occur within the facility
- Privately owned golf course
- Planned facilities that are not publicly owned by the entity

A wildlife or waterfowl refuge qualifies for protection under Section 4(f) if: (1) it is publicly owned at the time at which the use occurs; (2) the land has been officially designated as a wildlife and/or waterfowl refuge by a federal, state, or local agency; (3) its primary purpose is the conservation, restoration, or management of wildlife or waterfowl resources; and (4) it is considered significant by the OWJ. As per USFWS, there are no wildlife or waterfowl refuges located in the RSA²; therefore, these properties are not discussed in this Appendix or the EA.

For publicly owned multiuse land holdings, Section 4(f) applies only to those portions of a property that are designated by statute or identified in an official management plan of the administering agency as being primarily for public park, recreation, or wildlife and waterfowl refuge purposes, and are determined to be significant for such purposes.

Historic sites listed or eligible for listing in the NRHP are protected under Section 4(f). Although the statutory requirements of Section 106 of the NHPA and Section 4(f) are similar, if a project results in an “adverse effect” under Section 106, there is not automatically a Section 4(f) use. To determine whether a use of an NRHP-protected property would occur, CHSRA completes a separate Section 4(f) analysis and determination, in addition to those completed in compliance with the Section 106 process.

For a property to be eligible for listing in the NRHP, it must meet at least one of the four NRHP criteria (that is, Criterion A to D) described in this section. The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and meet one or more of the following criteria:

- **Criterion A:** Properties that are associated with events that have made a significant contribution to the broad patterns of our history

² USFWS. 2021. Find a Wildlife Refuge. Available online: <https://www.fws.gov/refuges/find-a-wildlife-refuge/?method=state&query=California>. Last updated 2021. Accessed February 8, 2021.



- **Criterion B:** Properties that are associated with the lives of persons significant in our past
- **Criterion C:** Properties that embody distinctive characteristics of a type, period, or method of construction; that represent the work of a master; that possess high artistic values; or that represent a significant and distinguishable entity whose components may lack individual distinction
- **Criterion D:** Properties that have yielded, or may be likely to yield, information important in prehistory or history

For archaeological sites, in addition to the general requirements for cultural properties, Section 4(f) applies only to those sites that are on or eligible for the NRHP and that warrant preservation in place, including those sites discovered during construction. After consultation with SHPO/Tribal Historic Preservation Officer, federally recognized Indian tribes (as appropriate), and the Advisory Council on Historic Preservation (ACHP) (if participating), Section 4(f) does not apply if CHSRA determines that the archaeological resource is important chiefly because of what can be learned by data recovery and has minimal value for preservation in place (23 CFR 774.13(b)).

D.2 Overview of Proposed Project

D.2.1 PURPOSE AND NEED

The proposed Project is a critical freight and passenger mobility project. The current ACE and Amtrak San Joaquin's passenger rail service is constrained by the Stockton Diamond Interlock at-grade crossing, which can cause reliability and on time performance schedule conflicts for both passenger and freight rail operations. The grade separation would help improve SJRRC and SJJPA operational performance in providing service between the Central Valley, Sacramento, and San Francisco Bay Area.

At the present time, the BNSF Stockton Subdivision and the UP Fresno Subdivision consist of two main tracks each, and intersect each other at a level, at-grade crossing known as the Stockton Diamond. This rail intersection, located just south of Downtown Stockton near South Aurora Street and East Scotts Avenue, is the busiest at-grade railway junction in California. The at-grade crossing results in significant congestion and delays to service that moves people and freight throughout the Central Valley as well as freight out to the broader national network. The current, at-grade track configuration results in significant delays to passenger and freight trains in the area, including those serving the Port of Stockton, as well as other trains in the area. Train congestion also causes local delays at roadway-rail grade crossings and potential motor vehicle, rail, bicycle, and pedestrian conflicts.

The proposed Project would construct a grade separation of the BNSF and UP rail lines to reduce rail congestion and allow for an uninterrupted flow of passenger and freight rail traffic through the crossing. The reduction in rail congestion would reduce delays for passenger rail providers, improve freight mobility that may lead to lower costs for freight shipping, and reduce delays for motor vehicle, bicyclist, and pedestrian traffic waiting for trains to pass. The reduction in train congestion and motor



vehicle wait times at these roadway-rail grade crossings would reduce locomotive and automobile idling and air emissions. See Chapter 1.0, *Introduction*, for a detailed discussion of the proposed Project's Purpose and Need.

D.2.2 ALTERNATIVES

No Action Alternative

Under the No Action Alternative, the proposed Project would not be implemented and none of the proposed Project components would be developed. There would be no proposed Project-related construction activities and all roadways and existing rail lines within the Project Study Area would continue to operate as they do now. Any eligible Section 4(f) properties would not be impacted; therefore, the use of Section 4(f) properties is not evaluated further for this alternative.

Proposed Project

The proposed Project would replace the existing at-grade intersection of the BNSF Stockton Subdivision and UP Fresno Subdivision with a grade-separation structure that elevates the UP main tracks above the BNSF main tracks, enabling through trains proceeding on the UP main tracks to advance through the intersection without conflict with through trains on the BNSF main tracks. The three existing wye track connections between the two railroads would remain and function much as they did prior to completion of the proposed Project, although their alignments would be modified to accommodate the development of the flyover structure and to reduce operating conflicts between trains on various routes within Stockton. No existing UP main tracks would remain in place at-grade across the BNSF main tracks after the Project is constructed. Traffic conflicts and train staging that currently occur, as trains wait on one railroad's main track for trains using the other railroad's main track to pass through the Stockton Diamond footprint, would be reduced once trains traveling on the UP main tracks begin using the grade-separation structure to cross above the BNSF main tracks. The at-grade crossing would be removed permanently, thereby removing the need for frequent maintenance and the resulting train delays created during shutdown of the crossing. See Chapter 2.0, *Project Description*, for a detailed description of the proposed Project.



Section 4(f) Applicability Analysis

This section identifies and describes the properties that meet the criteria for protection as Section 4(f) properties.

D.2.3 PARKS AND RECREATIONAL FACILITIES

The RSA for parks and recreation and Section 4(f) properties is defined consistently with the RSA for parks and recreation in Section 3.4, *Parks and Recreation and Section 4(f) Properties*, as the area within 1,000 feet of the proposed Project’s construction limits and proposed staging areas.

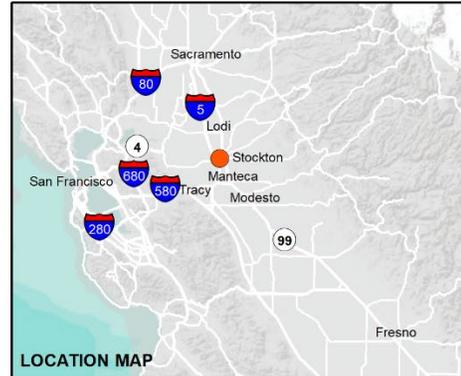
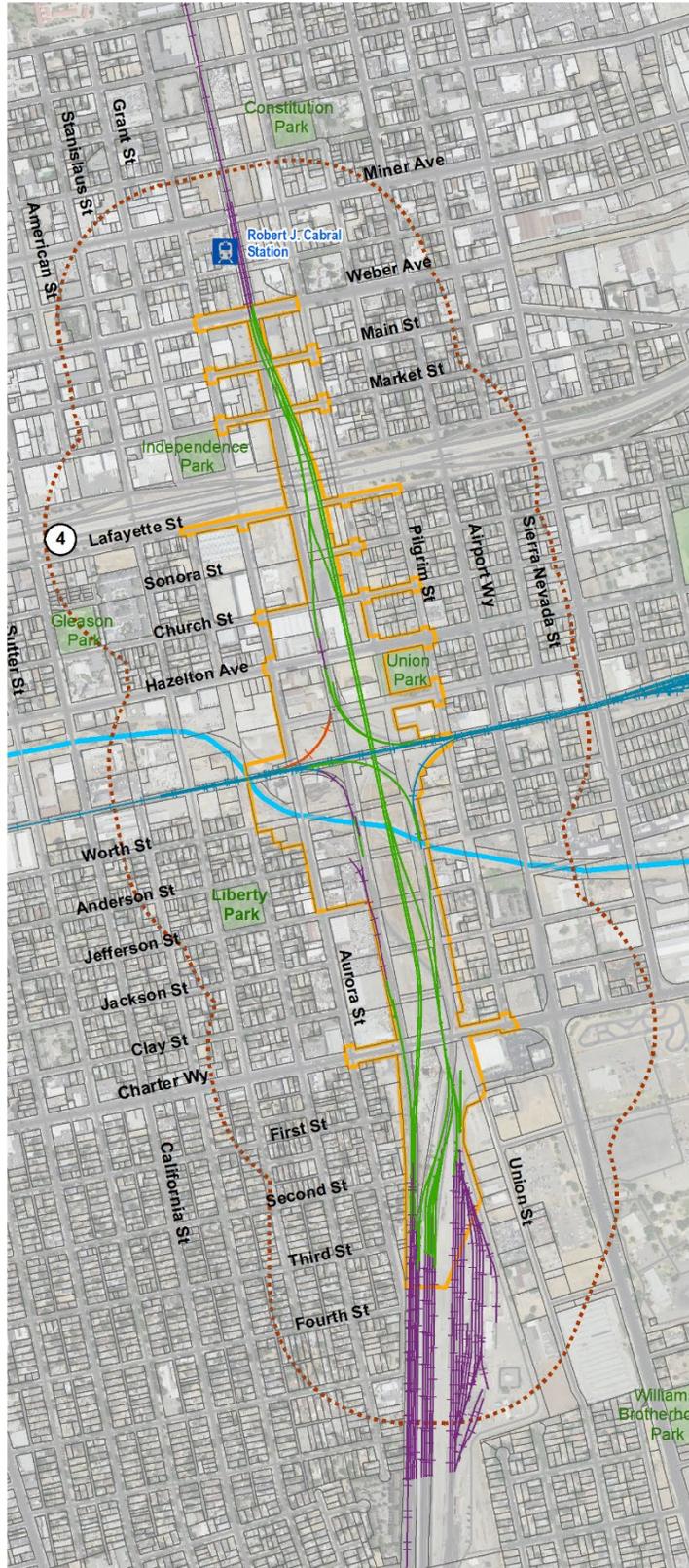
Table D-1 identifies four parks and recreational facility properties that meet the eligibility criteria noted in Section D.1.3 and fall within the RSA. Figure D-1 shows the proposed Project location, the RSA, and all eligible parks and recreational Section 4(f) properties located within the RSA.

Table D-1: Section 4(f) Properties – Parks and Recreational Facilities

Section 4(f) Property	OWJ	Proximity to Construction Limit	Type of Work Proposed at Property	Potential Effect on Property
Independence Park	City of Stockton	Adjacent to Project construction limits	None Anticipated	Temporary construction noise and dust impacts
Gleason Park	City of Stockton	807 feet	None Anticipated	None Anticipated
Union Park	City of Stockton	Partially within Project construction limits	TCE at corner of property	Temporary construction noise and dust impacts
Liberty Park	City of Stockton	338 feet	None Anticipated	Temporary construction noise and dust impacts



Figure D-1: Section 4(f) Properties – Parks and Recreational Facilities



PARKS AND RECREATIONAL SECTION 4(F) PROPERTIES

- Train Station
- Major Streets/Highways
- UP Fresno Subdivision
- BNSF Stockton Subdivision
- Future Stockton Wye Project
- Proposed Track
- Mormon Slough
- 1000 Foot Resource Study Area
- Project Study Area
- Parcel Boundaries
- Park



DATA SOURCE: City of Stockton, San Joaquin County GIS Data (2019) and USGS Aerial Imagery (2018), ESRI, NOAA



MAP CREATED ON: 9/17/2021



Independence Park

Independence Park is a 2-acre City of Stockton neighborhood park located at 802 East Market Street within the southwest quadrant of East Market Street and South Aurora Street. The park consists of a grassy open space available for public use. The Project construction limits terminate immediately east of the park and there would be no encroachment within the park boundary with any proposed Project elements or construction activities. There would be construction-related noise and dust impacts.

Gleason Park

Gleason Park is a 2-acre City of Stockton neighborhood park located at East Sonora Street and California Street. The park consists of a grassy open space, five picnic tables, and a playground available for public use. It is over 800 feet from the proposed Project construction limits.

Union Park

Union Park is a 2-acre City of Stockton neighborhood park located at East Hazelton Avenue and North Pilgrim Street. The park consists of a grassy open space, three picnic tables, and playground equipment available for public use. There is also a walking path that spans the diagonal of the park property. The proposed Project construction limits terminate at the northwestern border of the park and there would be no permanent encroachment within the park boundary with any proposed Project elements. However, there is an anticipated need for a TCE that would temporarily occupy a small portion of the northeastern corner of the park.

Liberty Park

Liberty Park is a 2-acre City of Stockton neighborhood park located at 725 East Jefferson Street within the northeast quadrant of Jefferson Street and South Stanislaus Street. The park consists of a grassy open space, four picnic tables, a playground, basketball courts, and a small walking trail for public use. The proposed Project construction limits terminate approximately 338 feet east of the park, and there would be no encroachment within the park. However, there is the potential for construction-related noise and dust impacts.

D.2.4 HISTORIC PROPERTIES

The RSA for impacts on historic properties includes the APE defined for Section 106 purposes. The APE includes a study area for built historic properties that encompasses all legal parcels intersected by the proposed Project as well as adjacent parcels in case the built historic properties on those parcels are indirectly affected. For archaeological sites, the APE also includes a study area for archaeological resources that was established based on an undertaking's potential for direct effects from ground-disturbing activities, including ground disturbance beyond the immediate footprint, which includes all preconstruction, construction, and operation activities. The APE for archaeology consists of the current and proposed ROW, temporary staging areas, utility easements, and laydown area. All historic properties located within the RSA/APE that meet the noted criteria qualify for



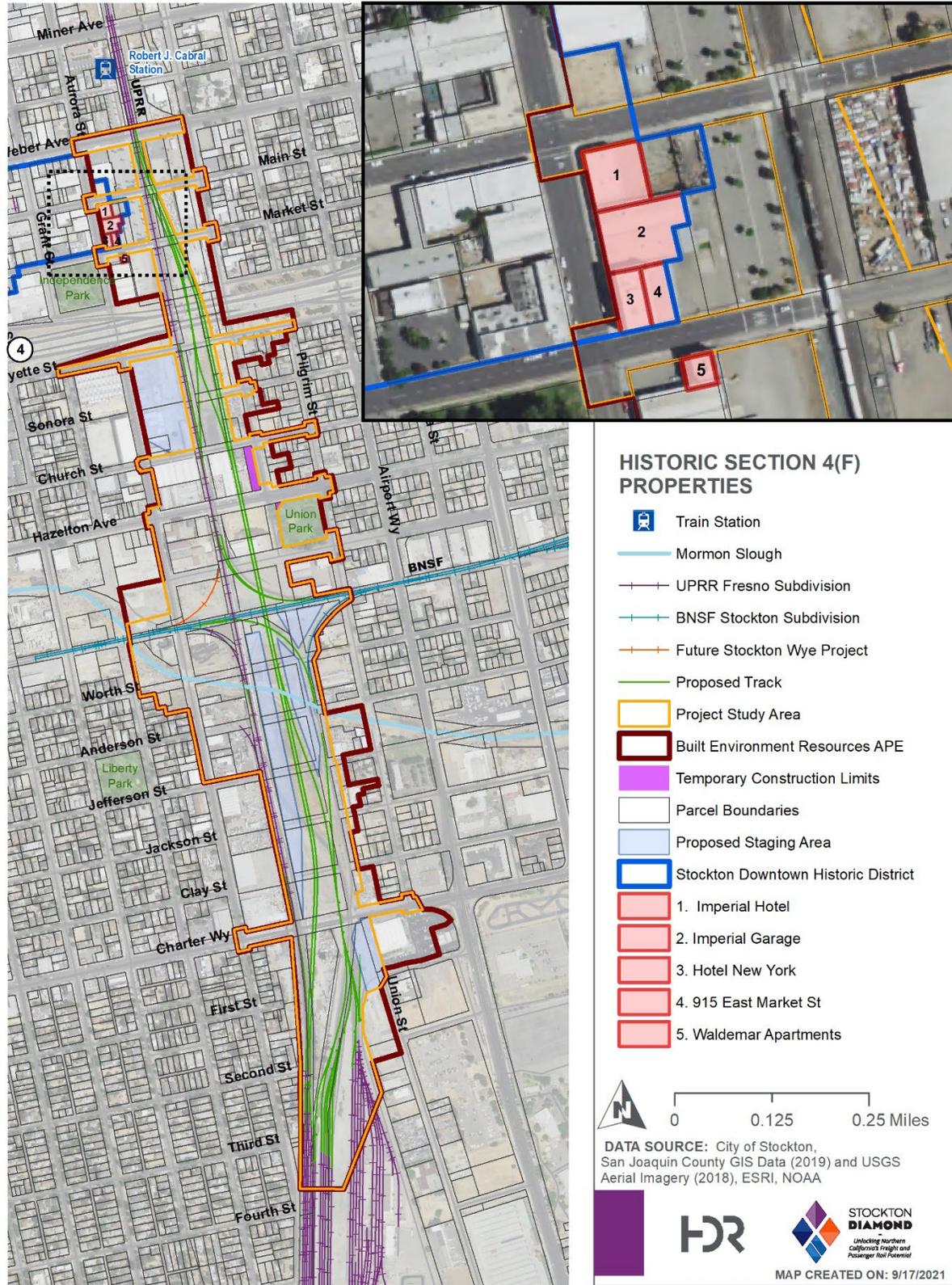
Section 4(f) protection and are listed in Table D-2. Each of these properties is identified in Figure D-2.

Table D-2: Section 4(f) Properties – Historic Properties

Section 4(f) Property	OWJ	Proximity to Construction Limit	Type of Work Proposed at Property	Anticipated Effect on Historic Property
Stockton Downtown Commercial Historic District	SHPO	Within and adjacent to Project construction limits	Utility modifications within public right-of-way	No Adverse Effect
Imperial Hotel	SHPO	Adjacent to Project construction limits	None anticipated	No Adverse Effect
Imperial Garage	SHPO	70 feet	None Anticipated	No Adverse Effect
Hotel New York	SHPO	Adjacent to Project construction limits	None Anticipated	No Adverse Effect
915 East Market Street	SHPO	Adjacent to Project construction limits	None Anticipated	No Adverse Effect
Waldemar Apartments	SHPO	Adjacent to Project construction limits	None Anticipated	No Adverse Effect



Figure D-2: Section 4(f) Properties – Historic Properties

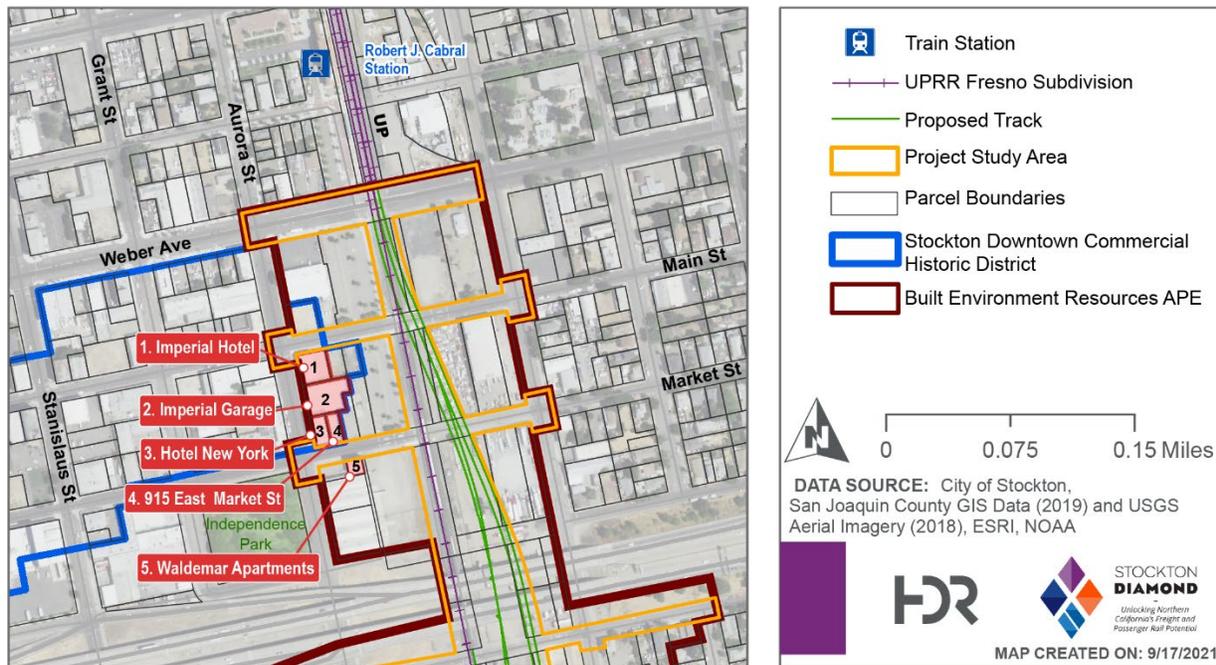




Stockton Downtown Commercial Historic District

The RSA/APE intersects the Stockton Downtown Commercial Historic District. Comprised of 84 contributing buildings within its approximate 21-city-block boundary, only four legal parcels at the district’s easternmost boundary are within the RSA/APE. A previous evaluation of the district concluded that it was eligible for listing in the NRHP. The present study updated previous evaluations of four of the district’s contributing buildings located along South Aurora and East Market streets in the RSA/APE. The district is significant at the local level under NRHP Criterion A within the context of commercial development of Stockton during a period of significance from 1880-1940. The boundary of the district generally extends east-west along Weber, Main, and Market streets between El Dorado and the Union Pacific Railroad. Although no specific character-defining features were identified in previous evaluations of the historic district, they would include the integrity of its contributing buildings and structures, including the four buildings in the RSA/APE. The historic district and the four contributors to the historic district within the RSA/APE, described below, are historic properties under Section 106 of the NHPA and are thus historic sites under Section 4(f). Figure D-3 depicts the eastern portion of the historic district and its contributing buildings as well as their relationships to the proposed Project construction limits.

Figure D-3: Stockton Downtown Commercial Historic District and Project Construction Limits





Imperial Hotel

The Imperial Hotel, located at 902 East Main Street, is a one-story, Victorian Eclectic-style building constructed of brick (Figure D-4). The building was found to be eligible for the NRHP at the local level under NRHP Criterion A as a contributor to the Stockton Downtown Commercial Historic District. The character-defining features identified for this structure include, but are not limited to, its arched window and door openings, Corinthian columns, terra cotta window and door surrounds, brick work detailing, and corner quoining. The period of significance for this historic property is 1896, the year it was constructed, through 1940, the end of the historic district's period of significance. The historic property boundary of this building is its current legal parcel.

Figure D-4: Imperial Hotel, Map Reference No. 3



Source: JRP Historical Consulting, LLC

Imperial Garage and 30 South Aurora Street

The Imperial Garage at 20 South Aurora Street and the similar, adjacent structure at 30 South Aurora Street are one-story early commercial buildings. Both rectangular buildings are of brick construction and have symmetrical facades with stepped parapets (see Figure D-5). The buildings were found to be eligible for the NRHP at the local level under NRHP Criterion A as a contributor to the Stockton Downtown Commercial Historic District. Character-defining features identified for this Project include, but are not limited to, their symmetrical facades, stepped parapets, three bays, and decorative brickwork. The period of significance for these buildings is ca. 1915 and 1918, respectively, the years they were constructed, through 1940, the end of the historic district's period of significance. Located on a single parcel, the historic property boundary for these buildings is their current legal parcel.



Figure D-5: Imperial Garage and 30 South Aurora Street, Map Reference No. 4



Source: JRP Historical Consulting, LLC

New York Hotel

The New York Hotel, located at 34 South Aurora street, is a four-story brick building with stepped parapets and corbeled cornice (Figure D-6). It has a modified first floor with stucco siding. Fenestration is generally symmetrical, with double-hung, wood-frame windows on the upper portion of each facade. The building was found to be eligible for the NRHP at the local level under NRHP Criterion A as a contributor to the Stockton Downtown Commercial Historic District. Character-defining features identified for this Project include, but are not limited to, its brick construction, symmetrical fenestration on upper floors, parapeted roof with corbeled cornice, belt courses, window lintels and sills, and construction date plaque. The period of significance for this historic property is 1910, the year it was constructed, through 1940, the end of the historic district's period of significance. The historic property boundary is its current legal parcel.



Figure D-6: New York Hotel, Map Reference No. 5



Source: JRP Historical Consulting, LLC

915 East Market Street

The building at 915 East Market Street is a two-story brick structure with a hipped roof and parapets with corbeled cornice (Figure D-7). The building was found to be eligible for the NRHP at the local level under NRHP Criterion A as a contributor to the Stockton Downtown Commercial Historic District. Character-defining features identified for this Project include, but are not limited to, Flemish bond brick construction, brick parapet, and brick window surrounds that incorporate soldier and header courses. The period of significance for this historic property is ca. 1926, the year it was constructed, through 1940, the end of the historic district's period of significance. The historic property boundary is its current legal parcel.



Figure D-7: 915 East Market Street, Map Reference No. 6



Source: JRP Historical Consulting, LLC

Waldemar Apartments

Waldemar apartments, located at 920 East Market Street, is a three-story early 20th century brick building with classical details (Figure D-8). The building is eligible for the NRHR at the local level under NRHP Criterion C as a representative example of a multi-storied, masonry apartment building constructed in the early 20th century. Its period of significance is 1918, the year it was constructed, and its character-defining features are its scale and massing; corbeled parapet; diamond-patterned belt course; flat roof; symmetrical fenestration that appears to still contain one-over-one, double-hung wood sash windows with brick lentils and sills; belt course between first and second floors; Flemish-bond, multi-colored brick; and primary and secondary entrances. The boundary of the property is its current legal parcel.



Figure D-8: Waldemar Apartments, Map Reference No. 7



Source: JRP Historical Consulting, LLC

D.3 Preliminary Section 4(f) Use Assessment

This section presents the proposed Project's preliminary use assessment for the park and recreational facilities (Section D.4.1) and historic properties (Section D.4.2) in the RSA identified in Section D.3. As noted earlier, USDOT defines the use of a Section 4(f) property when:

- a land is permanently incorporated into a transportation project
- there is a temporary occupancy of land that is adverse in terms of the statute's preservation purpose
- there is a constructive use (a project's proximity impacts are so severe that the protected activities, features, or attributes of a property are substantially impaired)

These three use definitions are applied to assess the use of Section 4(f) properties by the proposed Project.



D.3.1 PRELIMINARY SECTION 4(F) ASSESSMENT – PARKS AND RECREATIONAL FACILITIES

Independence Park, Gleason Park, and Liberty Park

Is there land permanently incorporated into the transportation project?

As seen in Figure D-1, Independence Park, Gleason Park, and Liberty Park are located outside of the proposed Project Study Area. None of the proposed Project elements would permanently encroach into the boundaries of these parks. Therefore, the proposed Project does not require the permanent incorporation of any portion of these Section 4(f) properties.

Is there a temporary occupancy of land that is adverse in terms of the statute's preservation purpose?

All proposed Project construction work would occur outside of the boundary of the Independence Park, Gleason Park, and Liberty Park properties. Therefore, temporary occupancy of these Section 4(f) properties would not occur.

Is there a constructive use of the property that is so severe that the protected activities, features, or attributes of a Section 4(f) property are substantially impaired?

Based on the analysis provided in this EA, no vibration, traffic, or visual impacts are anticipated during construction. Although Independence Park, Gleason Park, and Liberty Park are within the RSA for parks and recreational Section 4(f) properties, there would be no permanent or temporary construction-related traffic, air quality, visual, noise, or vibration effects on these Section 4(f) properties.

Construction activities would be located just outside of the Independence Park's eastern boundary, and park users may experience short-term, temporary noise and air quality (dust) impacts during construction. However, any construction-related effects related to noise and dust would be considered temporary in nature and would not impact the use of the park. In the long-term, the proposed Project would improve air quality through reduction of criteria air pollutant and GHG emissions caused by trains and vehicles that sit idling due to congestion and delays. Reductions in air pollutant emissions can lead to long-term health benefits for park users, addressing health problems associated with air pollution such as lung irritation, inflammation, asthma, heart and lung disease, and worsening of existing chronic health conditions.

Therefore, none of the impacts from implementation of the proposed Project would be severe or adverse enough to substantially impair the protected activities, features, or attributes of these parks and no constructive use would result.

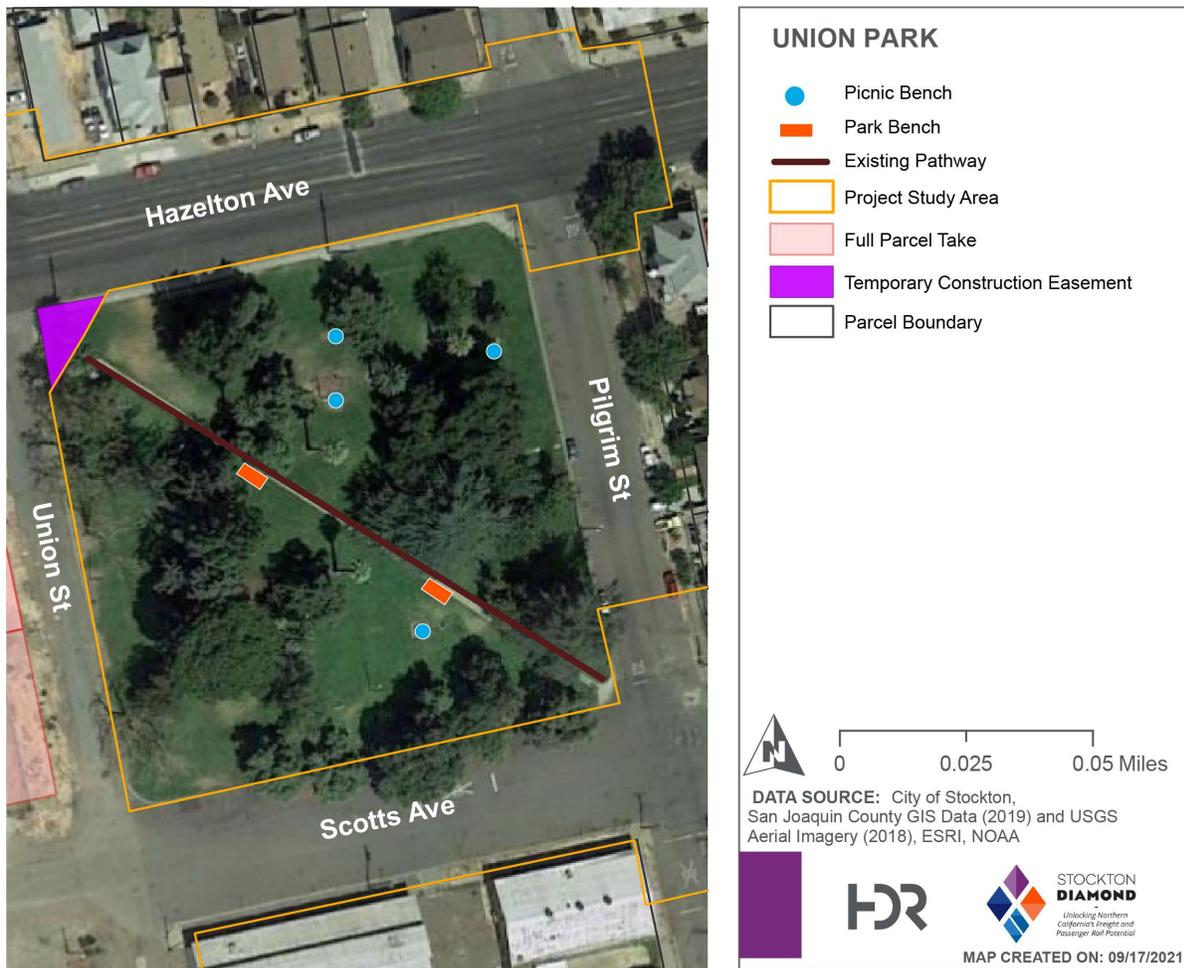
Determination: There would be no Section 4(f) use of Independence Park, Gleason Park, and Liberty Park by the proposed Project. No further Section 4(f) analysis is required.



Union Park

Union Park, located to the east of the proposed flyover and south and adjacent to the proposed East Hazelton Avenue underpass, would be impacted temporarily with the proposed Project. With the construction of the East Hazelton Avenue underpass, to provide a grade-separated crossing of the UP Fresno Subdivision, East Hazelton Avenue will need to be re-graded to allow for the appropriate height clearance below the new railroad flyover for arterial roadway use. There would be no permanent encroachment into Union Park to construct these roadway improvements, but there is an anticipated need for a 0.03-acre (1,316-square-foot) TCE that would temporarily occupy a small portion of the northeastern corner of the park (see Figure D-9). The park is 2 acres, so the temporary encroachment is within 1.4 percent of the Section 4(f) property.

Figure D-9: Proposed Project Impacts on Union Park





Is there land permanently incorporated into the transportation project?

The northwest corner of Union Park is within the proposed Project Study Area; however, none of the proposed Project elements would permanently encroach into the park boundary. Therefore, the proposed Project does not require the permanent incorporation of any portion of this Section 4(f) property.

Is there a temporary occupancy of land that is adverse in terms of the statute's preservation purpose?

The proposed Project anticipates the need for a TCE in the northwest corner of Union Park during the construction phase of the proposed Project. This TCE would be considered a temporary occupancy of the park property. However, as discussed in Section D.1.1, a temporary occupancy of property does not constitute a use of a Section 4(f) property when the following five conditions are satisfied. An assessment of the proposed Project's impact against the five conditions for an exception of use under Section 4(f) is described below.

- 1) The occupancy must be of temporary duration (for example, shorter than the period of construction) and must not involve a change in ownership of the Section 4(f) property.
 - It is anticipated that the TCE would be required for approximately 2 to 4 weeks, which is substantially less than the duration of Project construction (3 years). In addition, there would be no temporary or permanent change in the ownership of any portion of the Section 4(f) property.
- 2) The scope of use must be minor, with only minimal changes to the Section 4(f)-protected property.
 - The construction activities at the northwestern corner of Union Park include temporary storage of materials and construction access to East Hazelton Avenue. None of Union Park's recreational activities, features, or attributes would be impacted with the temporary occupancy of the Section 4(f) property.
- 3) There must be no permanent adverse physical impacts to the protected property or temporary or permanent interference with activities or purpose of the Section 4(f) property.
 - As show in Figure D-9, a small portion of the northwest corner of Union Park at East Hazelton Avenue and South Union Street would be temporarily closed off during construction by a TCE. This TCE is required to construct the underpasses at East Hazelton Avenue and East Scotts Avenue and to protect park users from construction activities. Within this northwest corner, there is an existing entrance to a park pathway that crosses the park diagonally in a northwest to southeast direction to the Pilgrim Street and Scotts Avenue intersection. During the temporary construction activities at this location, this park access would be closed. However, the other southeastern end of the diagonal pathway would remain open for public access. Further, the park is an open facility with no fencing around its perimeter; therefore, continuous and unobstructed access allows for entry at almost any point, and no impacts to the recreational activities, features, or attributes of the Section 4(f) property would occur. At the conclusion of construction, this northwestern pathway entry point would be re-opened for public use.



- 4) The Section 4(f) property being used must be fully restored to a condition that is at least as good as that which existed prior to project construction.
 - o At the conclusion of construction activities at the northwestern corner of Union Park, the park entrance at this location would be re-opened and the area closed off during construction would be returned to pre-construction conditions.
- 5) There must be documented agreement of the appropriate OWJ over the Section 4(f) property regarding the foregoing requirements.
 - o On April 9, 2021, SJRRC and CHSRA sent the City of Stockton a letter requesting concurrence with the preliminary determination that all five conditions for an exception of use have been met, thereby qualifying the Project as having no Section 4(f) use of Union Park. On September 9, 2021, the City of Stockton as the OWJ over Union Park concurred with the determination. A copy of the request for concurrence letter from SJRRC and CHSRA with signed agreement from the City of Stockton is provided in Attachment A of this Section 4(f) and Section 6(f) Evaluation. All coordination will be documented in Section D.5.

All five conditions described above have been met for a temporary occupancy exception of use determination of Union Park under Section 4(f).

Is there a constructive use of the property that is so severe that the protected activities, features, or attributes of a Section 4(f) property are substantially impaired?

The Project plans to incorporate Measures BMP TRA-2 (Construction Management Plan), BMP TR-4 (Maintenance of Pedestrian Access), BMP TRA-5 (Maintenance of Bicycle Access), and BMP TRA-7 (Transportation Management Plan) in Table 3.7-6 in Section 3.7, *Traffic and Transportation*, and Measures BMP AQ-1 (Compliance with EPA's Tier 4 Exhaust Emission Standards) and BMP AQ-2 (Fugitive Dust) in Table 3.13-3, in Section 3.13, *Air Quality*. Therefore, although Union Park is surrounded by and partially within the proposed Project Study Area, no indirect temporary effects related to traffic, noise, or air quality (dust) impacts would occur and no users of Union Park would be affected during construction. Accordingly, traffic, noise, or air quality (dust) impacts would not be of a severity that the protected activities, features, or attributes that qualify Union Park for protection under Section 4(f) would be substantially impaired, and no constructive use would result.

Preliminary Determination: Union Park is subject to a temporary occupancy exception of use. The OWJ concurred with this determination on September 9, 2021. Therefore, no further Section 4(f) analysis is required.

D.3.2 PRELIMINARY SECTION 4(F) ASSESSMENT – HISTORIC PROPERTIES

Stockton Downtown Commercial Historic District

Utility relocation, protection in place, and/or removal would occur within the boundaries of the historic district. Utilities consist of storm drains, underground water, sewer, gas lines, overhead electrical lines, and fiber optic cable. All modifications to utilities would be conducted within the public ROW. As seen in Figure D-3, there would be no permanent encroachment into the district to construct these utility modifications, but temporary construction areas are proposed within the eastern edge of



the district, intersecting some of the district's contributing buildings. However, no construction activity would be conducted within any historic property boundary of district contributors.

Is there land permanently incorporated into the transportation project?

The proposed Project does not require permanent encroachment within any portion of the Stockton Downtown Commercial Historic District. Therefore, permanent incorporation of the Section 4(f) property would not occur.

Does the utility construction area have a de minimis impact?

In accordance with the Section 106 process and after consultation with interested Native American tribes, CHSRA made a finding of no adverse effect (FOE) for the Downtown Commercial Historic District. On December 9, 2021, SHPO agreed with FOE as detailed in Section 3.9 of this Draft EA. For the purposes of Section 4(f), CHSRA has used SHPO's written concurrence in the FOE to preliminarily determine that the temporary construction areas proposed in the eastern edge of the district necessary for utility relocation, protection in place, and/or removal in the Stockton Downtown Historic District would have *de minimis* impacts. Prior to the issuance of the final EA, CHSRA will inform SHPO of its intent to make a *de minimis* impact determination based on SHPO's concurrence in the finding of "no adverse effect." CHSRA will notify SHPO of its intent to make a *de minimis* finding per CFR 774.5(b)1.

Is there a constructive use of the property that is so severe that the protected activities, features, or attributes of a property are substantially impaired?

The proposed Project would not result in adverse impacts to the Stockton Downtown Commercial Historic District from the introduction of new visual elements. The new at-grade tracks and rail crossings at East Main and East Market streets would each be located east of and more than 130 feet away from the historic district boundary. The crossings would include the upgrading of railroad equipment, flashing light signals, gate arms, signing and pavement markings, as well as potential pedestrian upgrades such as ADA-compliant tactile walking surface indicators and streetlights. These types of railroad, roadway, pedestrian features, and tracks would be located within, or immediately east of, the railroad ROW. While the new tracks and crossings would be visible from the eastern end of the district boundary, none of these proposed Project components, including the removal of extant tracks, would adversely alter the view or setting of the historic district or any of its contributors because they are consistent with historic-period and existing railroad infrastructure and would blend in with the setting. Therefore, the proposed Project would not diminish the integrity of significant historic features of the Stockton Downtown Commercial Historic District or any of its contributing historic features. Accordingly, visual impacts would not be of a severity that the protected activities, features, or attributes that qualify the Stockton Downtown Commercial Historic District for protection under Section 4(f) would be substantially impaired, and no constructive use would result.

Determination: Based on the evaluation of potential permanent incorporation, temporary occupancy, or constructive use of the Stockton Downtown Historic District presented above, the preliminary



determination for the Stockton Downtown Historic District is a temporary occupancy exception of use, pending OWJ concurrence. Therefore, no further Section 4(f) analysis is required.

Imperial Hotel

Is there land permanently incorporated into the transportation project?

The Imperial Hotel is located adjacent to the proposed Project's construction limits; however, none of the proposed Project elements would permanently encroach into the boundary of the historic property. Therefore, the proposed Project does not require the permanent incorporation of any portion of Section 4(f) property.

Is there a temporary occupancy of land that is adverse in terms of the statute's preservation purpose?

No temporary encroachment within the Imperial Hotel's historic property boundary by construction activities would occur since all proposed Project construction work would occur outside of the boundary of this historic property. Therefore, no temporary occupancy of the Section 4(f) property would occur.

Is there a constructive use of the property that is so severe that the protected activities, features, or attributes of a property are substantially impaired?

Any construction-related effects related to potential visual or noise impacts would not substantially impair the protected activities, features, or attributes of this historic Section 4(f) property. Refer to Section 3.9, *Cultural Resources*, for additional information.

Determination: Based on the evaluation of potential permanent incorporation, temporary occupancy, or constructive use of Imperial Hotel presented above, there would be no Section 4(f) use of the historic Section 4(f) property by the proposed Project. No further Section 4(f) analysis is required.

Imperial Garage and 30 South Aurora Street

Is there land permanently incorporated into the transportation project?

The Imperial Garage or 30 South Aurora Street properties are 70 feet from the proposed Project's construction limits. None of the proposed Project elements would permanently encroach into the boundary of the historic property. Therefore, the proposed Project does not require the permanent incorporation of any portion of Section 4(f) property.

Is there is a temporary occupancy of land that is adverse in terms of the statute's preservation purpose?

No temporary encroachment within the Imperial Garage or 30 South Aurora Street's historic boundaries by construction activities would occur since all proposed Project construction work would occur outside of the boundary of these historic properties. Therefore, no temporary occupancy of the Section 4(f) property would occur.



Is there a constructive use of the property that is so severe that the protected activities, features, or attributes of a property are substantially impaired?

Any construction-related effects related to potential visual and noise impacts would not substantially impair the protected activities, features, or attributes of this historic Section 4(f) property. Please refer to Section 3.9, *Cultural Resources*, for additional information.

Determination: Based on the evaluation of potential permanent incorporation, temporary occupancy, or constructive use of Imperial Garage and 30 South Aurora Street presented above, there would be no Section 4(f) use of the historic Section 4(f) properties by the proposed Project. No further Section 4(f) analysis is required.

New York Hotel

Is there land permanently incorporated into the transportation project?

The New York Hotel is located adjacent to the proposed Project's construction limits; however, none of the proposed Project elements would permanently encroach into the boundary of the historic property. Therefore, the proposed Project does not require the permanent incorporation of any portion of Section 4(f) property.

Is there a temporary occupancy of land that is adverse in terms of the statute's preservation purpose?

No temporary encroachment within the New York Hotel's historic property boundary by construction activities would occur since all proposed Project construction work would occur outside of the boundary of this historic property. Therefore, no temporary occupancy of the Section 4(f) property would occur.

Is there a constructive use of the property that is so severe that the protected activities, features, or attributes of a property are substantially impaired?

Any construction-related effects related to potential visual and noise impacts would not substantially impair the protected activities, features, or attributes of this historic Section 4(f) property. Refer to Section 3.9, *Cultural Resources*, for additional information.

Determination: Based on the evaluation of potential permanent incorporation, temporary occupancy, or constructive use of New York Hotel presented above, there would be no Section 4(f) use of the historic Section 4(f) properties by the proposed Project. No further Section 4(f) analysis is required.

915 East Market Street

Is there land permanently incorporated into the transportation project?

915 East Market Street is located adjacent to the proposed Project's construction limits; however, none of the proposed Project elements would permanently encroach into the boundary of the historic property. Therefore, the proposed Project does not require the permanent incorporation of any portion of Section 4(f) property.



Is there a temporary occupancy of land that is adverse in terms of the statute's preservation purpose?

No temporary encroachment within the 915 East Market Street's historic property boundary by construction activities would occur since all proposed Project construction work would occur outside of the boundary of this historic property. Therefore, no temporary occupancy of the Section 4(f) property would occur.

Is there a constructive use of the property that is so severe that the protected activities, features, or attributes of a property are substantially impaired?

Any construction-related effects related to potential visual and noise impacts would not substantially impair the protected activities, features, or attributes of this historic Section 4(f) property. Refer to Section 3.9, *Cultural Resources*, for additional information.

Determination: Based on the evaluation of potential permanent incorporation, temporary occupancy, or constructive use of 915 East Market Street presented above, there would be no Section 4(f) use of the historic Section 4(f) properties by the proposed Project. No further Section 4(f) analysis is required.

Waldemar Apartments

Is there land permanently incorporated into the transportation project?

The Waldemar Apartments are located adjacent to the proposed Project's construction limits; however, none of the proposed Project elements would permanently encroach into the boundary of the historic property. Therefore, the proposed Project does not require the permanent incorporation of any portion of Section 4(f) property.

Is there a temporary occupancy of land that is adverse in terms of the statute's preservation purpose?

No temporary encroachment within the Waldemar Apartments' historic property boundary by construction activities would occur since all proposed Project construction work would occur outside of the boundary of this historic property. Therefore, no temporary occupancy of the Section 4(f) property would occur.

Is there a constructive use of the property that is so severe that the protected activities, features, or attributes of a property are substantially impaired?

Any construction-related effects related to potential visual and noise impacts would not substantially impair the protected activities, features, or attributes of this Section 4(f) property. Refer to Section 3.9, *Cultural Resources*, for additional information.

Determination: Based on the evaluation of potential permanent incorporation, temporary occupancy, or constructive use of Waldemar Apartments presented above, there would be no Section 4(f) use of the historic Section 4(f) properties by the proposed Project. No further Section 4(f) analysis is required.



D.4 Coordination with Officials with Jurisdiction

Union Park Coordination

On April 8, 2021, SJRRC and CHSRA requested concurrence from the City of Stockton, the OWJ over Union Park, for the temporary occupancy exception of use determination. The impacts to Union Park have been discussed with the City of Stockton during monthly Project Development Team meetings, during which the SJRRC is partnering with the City of Stockton and other key stakeholders to discuss Project elements, anticipated impacts, and feasible options to avoid or minimize impacts on the park. During these meetings, the Project team has discussed the construction-phase activities that require a TCE and temporary use of Union Park. On September 9, 2021, the City of Stockton provided concurrence with the determination. A copy of the request for concurrence letter from SJRRC and CHSRA with signed agreement from the City of Stockton is provided in Attachment A of this Section 4(f) and Section 6(f) Evaluation.

Stockton Downtown Commercial Historic District Coordination

CSHRA, as NEPA Lead Agency, has determined that the proposed Project would have no adverse effect on historic properties within the APE. The project FOE Report was submitted to SHPO on August 4, 2021, and an Addendum to the FOE Report was submitted in November 2021. SHPO agreed with the project finding of “no adverse effect” on December 9, 2021, given the Project BMPs identified in Table 3.9-3, in Section 3.9, *Cultural Resources*, would be incorporated as part of the proposed Project. The FOE and SHPO concurrence information has been provided in Appendix H of this Draft EA. For the purposes of Section 4(f), CHSRA has used the consultation with SHPO and its written concurrence in the FOE to preliminarily determine that the temporary construction areas proposed in the eastern edge of the Stockton Downtown Commercial Historic District necessary for utility relocation, protection in place, and/or removal would have de minimis impacts. Prior to the issuance of the Final EA, CHSRA will inform SHPO of its intent to make a de minimis impact determination based on SHPO’s concurrence in the finding of “no adverse effect.”



This page is intentionally left blank



Attachment A: Correspondence and Concurrence



This page is intentionally left blank



Chair, **Christina Fugazi**, City of Stockton
Vice Chair, **Leo Zuber**, City of Ripon
Commissioner, **Jose Nuño**, City of Manteca
Commissioner, **Mikey Hothi**, City of Lodi

Commissioner, **Nancy Young**, City of Tracy
Commissioner, **Kathy Miller**, San Joaquin County
Commissioner, **Melissa Hernandez**, Alameda County
Commissioner, **Lily Mei**, City of Fremont

Executive Director, **Stacey Mortensen**

April 8, 2021

Amanda Thomas
Real Property Manager
City of Stockton – Economic Development Department
400 E. Main Street, 4th Floor
Stockton, CA 95202

Dear Ms. Thomas:

The San Joaquin Regional Rail Commission (SJRRRC), Lead Agency under the California Environmental Quality Act (CEQA), and California High Speed Rail Authority (CHSRA), under assignment by the Federal Railroad Administration¹, the National Environmental Policy Act (NEPA) Lead Agency, are providing this letter to formally inform the City of Stockton of the expected need for a temporary construction easement (TCE) for construction activities related to the SJRRRC's proposed Stockton Diamond Grade Separation Project (proposed Project). The easement area is located at Union Park, and the City of Stockton has been identified as the official with jurisdiction (OWJ) over this property.

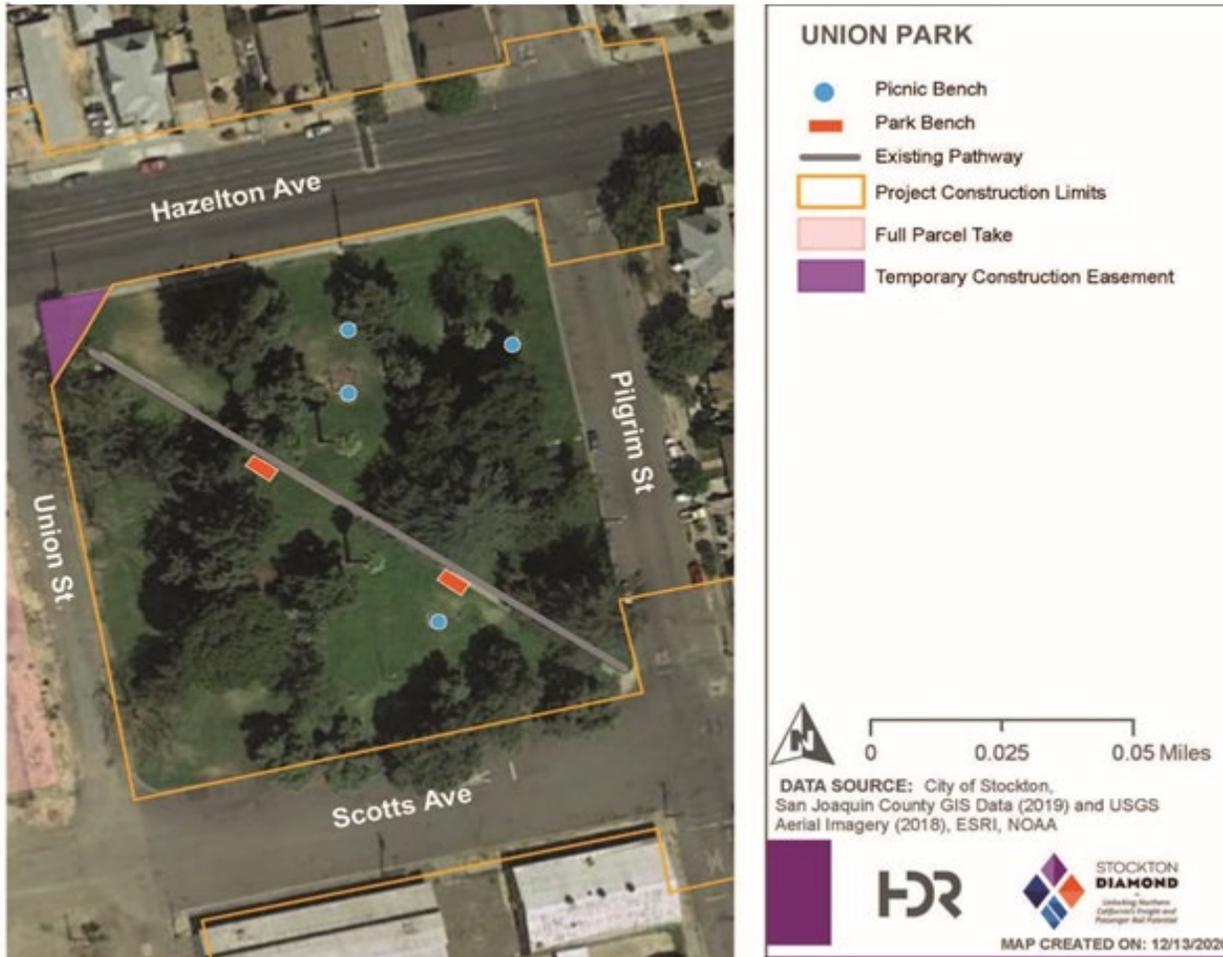
The proposed Project would replace the existing at-grade intersection of the BNSF Stockton Subdivision and UP Fresno Subdivision with a grade-separation structure that elevates the UP main tracks above the BNSF main tracks, enabling through trains proceeding on the UP main tracks to advance through the intersection without conflict with through trains on the BNSF main tracks. No existing UP main tracks would remain in place at-grade across the BNSF main tracks after the proposed Project is constructed.

As part of the proposed Project, Union Park, located to the east of the proposed flyover and south and adjacent to the proposed East Hazelton Avenue underpass, would be temporarily impacted during construction. Union Park is recognized as a protected Section 4(f) resource (pursuant to 49 USC 303 of U.S Department of Transportation Act of 1966 [USDOT Act]). With the construction of the East Hazelton Avenue underpass, included as part of the proposed Project to provide a grade-separated crossing of the UP Fresno Subdivision, East Hazelton Avenue will need to be re-graded to allow for the appropriate vertical clearance below the new railroad flyover for arterial roadway use. There would be no permanent encroachment into Union Park to construct these roadway improvements, but there is an anticipated need for a 0.03-acre (1,316-square-foot) TCE that would temporarily occupy a small portion of the northeastern corner of the park (**Figure 1**). The park is 2.11 acres, so the temporary encroachment is within 1.4 percent of the park property.

As detailed in the regulation, five conditions need to be satisfied in order to meet the temporary occupancy exception. Those conditions, and the basis for SJRRRC's determination as to how each is satisfied for Union Park, are summarized as follows:

¹ CHSRA is the lead NEPA agency, pursuant to 23 USC Section 327 and the terms of the NEPA Assignment Memorandum of Understanding (FRA and State of California 2019).

Figure 1: Proposed Project Impacts on Union Park



- The occupancy must be of temporary duration (for example, shorter than the period of construction) and must not involve a change in ownership of the property.
 - The proposed Project anticipates the need for a TCE for a time period of 2 to 4 weeks, substantially less than the duration of Project construction (3 years). In addition, there would be no temporary or permanent change in the ownership of any portion of the property.
- The scope of use must be minor, with only minimal changes to the protected resource.
 - The construction activities at the northwestern corner of Union Park include temporary storage of materials and access to East Hazelton Avenue. None of Union Park’s recreational features would be impacted with the temporary use of the property.
- There must be no permanent adverse physical impacts to the protected resource or temporary or permanent interference with activities or purpose of the resource.

Ms. Amanda Thomas

April 8, 2021

Page 3 of 4

- During construction, a small portion of the corner of Union Park would be closed off to protect park users from construction activities. At this location, there is an entrance to a park pathway that crosses the park, and during the duration of the TCE at this location, this park access would be closed. The other end of the diagonal pathway would remain open for access. However, the park is an open facility with continuous access around its perimeter that allows for entry at almost any point. At the conclusion of construction, this park access area would be re-opened for public use.
- The property being used must be fully restored to a condition that is at least as good as existed before project construction.
 - At the conclusion of construction activities at the northwestern corner of Union Park, the park entrance at this location would be re-opened and the area closed off during construction would be returned to a condition at least as good as prior to construction. Through coordination to date, the City has requested the privately-owned segment of Union Street adjacent to the Park to be converted to a public street. If this occurs with the proposed Project, sidewalk improvements would be constructed along the edge of Union Park between East Hazelton and East Scotts Avenues.
- There must be documented agreement of the appropriate officials having jurisdiction over the resource regarding the foregoing requirements.
 - The Project Team has coordinated with the City of Stockton through project development and is seeking concurrence from the City as the OWJ on the project effects on Union Park and requirements discussed above.

With this letter SJRRC and CHSRA, as assigned by FRA, are respectfully requesting your agreement with our determination, that the TCE needed in conjunction with construction of the proposed Project adjacent to Union Park would be a Temporary Occupancy as set forth in 23 CFR 774.13(d). A signature block is provided at the end of this letter for your convenience to provide your agreement with the temporary occupancy determination.

Sincerely,



Kevin Sheridan, PMP
Director of Capital Projects
San Joaquin Regional Rail Commission/San Joaquin Joint Powers Authority

cc: Wes Johnson, City of Stockton
Eric Alvarez, City of Stockton

Ms. Amanda Thomas
April 8, 2021
Page 4 of 4

Concurrence by:

Amanda Thomas

9-9-21

Amanda Thomas
City of Stockton
Economic Development Department

Date