

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF HOUSING POLICY DEVELOPMENT**

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November 5, 2025

Nancy Arroyo, Real Property Agent I  
Economic Development Department  
City of Stockton  
425 N. El Dorado Street  
Stockton, CA 95202

SENT VIA EMAIL TO: [nancy.arroyo@stocktonca.gov](mailto:nancy.arroyo@stocktonca.gov)

Dear Nancy Arroyo:

**RE: City of Stockton - 6461 Brookside Road - Surplus Land Act Findings Letter**

Thank you for notifying the California Department of Housing and Community Development (HCD) of the City of Stockton's (City) determination of a 73.84 portion of property located at 6461 Brookside Road, Assessor's Parcel Number 071-140-17(Property), as "exempt surplus land." Your complete documentation was received on October 6, 2025.

HCD reviewed Resolution No. 2025-09-23-1208 (Resolution) and supporting documentation pursuant to Section 400 of the Surplus Land Act Guidelines. As explained below, HCD finds that the Property qualifies as "exempt surplus land" under Government Code section 54221, subdivision (f)(1)(D).

**Analysis**

As provided in Government Code section 54221, subdivision (f)(1)(D) states, "exempt surplus land" includes:

"Surplus land that a local agency is transferring to another local, state, or federal agency, or to a third-party intermediary for future dedication for the receiving agency's use, or to a federally recognized California Indian tribe. If the surplus land is transferred to a third-party intermediary, the receiving agency's use must be contained in a legally binding agreement at the time of transfer to the third-party intermediary."

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According to the Resolution, which was adopted on September 23, 2025, the Property is part of a larger parcel measuring approximately 114.39 acres and is not necessary for the City's use. The City intends to transfer the Property to the San Joaquin Flood Control Agency (SJAFCA), which is another local agency. SJAFCA intends to use the Property to complete a levee improvement project. On October 6, 2025, the City confirmed that Government Code section 54221, subdivision (f)(2), does not apply to the Property and, therefore, a written notice of availability for open-space purposes is not required.

### **Conclusion**

If the submitted documentation and assertions by the City are complete and accurate, HCD finds that the Property qualifies as "exempt surplus land" under Government Code section 54221, subdivision (f)(1)(D). SJAFCA should be aware that future dispositions, as defined in Government Code section 54221, subdivision (d)(1), of the Property, would be subject to the Surplus Land Act.

If you have any questions or need additional technical assistance, please contact Sandra Mukasa, Senior Housing Policy Specialist, at [Sandra.Mukasa@hcd.ca.gov](mailto:Sandra.Mukasa@hcd.ca.gov) or submit a request via the [Surplus Land Act Portal](#).

Sincerely,



Laura Nunn  
Housing Accountability Unit Chief