

# PORT OF STOCKTON

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February 23, 2004

Mr. Jeremy Arrich  
DWR, DPLA  
P.O. Box 942836  
Sacramento, CA 94236-001  
Email: [arrich@water.ca.gov](mailto:arrich@water.ca.gov)

Dear Mr. Arrich:

We are forwarding initial comments on the Draft In-Delta Storage Program State Feasibility Study, which proposes a \$774 million in capital cost projects for Webb Tract and Bacon Island as water storage islands, and Holland Tract and Bouldin Island as habitat islands. We have had only 3 weeks to review the multiple volumes of reports and really need more time to review all the documents adequately. We request an additional 60 days to review the documents, which are new to us.

We note there has been a substantial public outreach process described in the draft Summary Report. The Port of Stockton, a state chartered agency, has not been invited to or made aware of the public outreach process or stakeholders committee meetings to date.

Our Federally authorized John F. Baldwin to Stockton Ship Channel traverses the waterway around Webb Tract. We believe your project may have impacts to our federally authorized shipping lanes. We need to know what those potential impacts are with the appropriate mitigations.

The Port of Stockton also owns property on Bradford Island, west of Webb Tract and believes from past history that the flooding of Webb Tract creates seepage into Bradford Island. The Port also needs to know what the potential impacts are with appropriate mitigations because if seepage caused a levee failure to Bradford's levees it could also affect the Stockton Ship Channel, which traverses around Bradford Island.

We have scanned the volumes of reports and can find only two references to navigation. The draft Summary Report on Table 8.1, page 130 mentions Section 10 of the Rivers and Harbors Act of 1899 and Appendix B of the draft Report on Operations, page 67 mentions navigable waters for the American River. We cannot

find any discussion or mention of the Port of Stockton and the ship channel, which extends from the Golden Gate to the City of Stockton in any of your reports. It is clear to us those possible impacts to commerce navigation or the ship channel was not a consideration in your study.

Please feel free to contact us regarding our concerns about your proposed projects.

Sincerely,



Richard Aschieris

Port Director

Port of Stockton

Cc: Walter Yep  
Gordon Palmer  
Gary Gentry  
Jeff Kaspar  
Lee Hieber

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**March 19, 2004**

**Mr. Jeremy Arrich  
DWR, DPLA  
P.O. Box 942836  
Sacramento, CA 94236-001  
Email: [arrich@water.ca.gov](mailto:arrich@water.ca.gov)**

**Dear Mr. Arrich:**

**We are electronically mailing this letter and the attached Port of Stockton Comments on the Draft In-Delta Storage Program State Feasibility Study in order to meet your deadline of March 20, 2004 for comments. A hard copy of this letter and the attached Port of Stockton Comments will be sent to you as well.**

**As stated in our comments, we do not oppose the Draft In-Delta Storage Program State Feasibility Study and other CALFED activities in our area. We are concerned about the absence of communications between the Port and CALFED activities.**

**Please feel free to contact us regarding our concerns about your proposed projects.**

**Sincerely,**

**Richard Aschieris  
Port Director  
Port of Stockton**

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## Port of Stockton Comments Draft In-Delta Storage Program State Feasibility Study March 19, 2004

1. These comments supplement our letter of February 23, 2004 sent to Mr. Jeremy Arrich, DWR, DPLA, P.O. Box 942836, Sacramento, CA 94236-001, which note the substantial public outreach process described in the draft Summary Report. However, the Port of Stockton, a state chartered agency, has not been invited to participate in the public outreach process or stakeholders committee meetings to date.
2. There appears to be other CALFED funded or supported activities in our region in addition to the Draft In-Delta Storage Program State Feasibility Study. These activities include the Vernalis Adaptive Management Plan (VAMP) and the recent California Bay Delta Authority approved grant to study water quality in the Lower San Joaquin River and the Stockton Ship Channel. The Port does not know the full extent of the CALFED activities, which may have an impact on the present and future operation of our commercial navigation program.
3. The Port of Stockton is the second busiest inland port on the West Coast – handling more than 7 million tons of cargo with trade relationships with more than 55 countries. The Port is also the third largest landholder port on the West Coast. Our Federally authorized ship channel, from the westerly boundary of Suisun Bay to Stockton, has a project depth of 35 feet below lower low water and from Suisun Bay to San Francisco Bay at a depth of 36 feet. The waterway has no width restrictions for ships. The other commercial navigation activities in the CALFED area of activities are the Ports of Sacramento, Benicia, Pittsburg, and Contra Costa County and the Concord Naval Weapons Station. It is not known whether these other navigation interests have been informed on CALFED activities.
4. The Port and the San Francisco District of the Army Corps of Engineers have been engaged in feasibility studies to further deepen the Stockton Ship Channel from 35 feet to a greater depth. Congress has authorized the lower reaches of the ship channel, known as the John F. Baldwin Ship Channel, to a depth of 45 feet. The Corps project manager for our deepening studies is Mr. Dave Patterson at the San Francisco District, telephone 415-977-8707.

5. Also, the Port is promoting economic growth and family-wage jobs for the Central Valley by developing infrastructure on Rough and Ready Island. Significant investment and progress has been on Rough and Ready Island facilities. Additional developments will take place in the near future. The Port of Stockton is also a municipal utility with approval from the Federal Energy Regulatory Commission.
6. The Port has a significant annual maintenance dredging program with the Sacramento District of the Army of Engineers. This annual program may vary from \$2 –4 million dollars in Federal funds. The Corps point of contact for this activity is Mr. Jim Sandners, Operations Manager at 916-557-5275.
7. The Port of Stockton does not oppose the Draft In-Delta Storage Program State Feasibility Study, the VAMP, or CALFED water quality grants. The Port is supportive of CALFED efforts to improve fish passage and water quality in the lower San Joaquin River. The Port is concerned about these ongoing activities and the absence of communications. In the interest of improving the communications process, the Port will have a representative at the next California Bay Delta Authority meeting scheduled for April 7 and 8 in Sacramento.
8. The Port believes an important step in communications would be a briefing on all CALFED supported activities that may impact our commercial navigation interests. The point of contact for the Port would be Mr. Jeff Kasper, Deputy Port Director for Environmental Planning and Facilities. The Port would gladly provide the meeting room and also a tour of our harbor facilities.