

From: [Mary Elizabeth Rodriguez, Melanie](#)
To: [Rodriguez, Melanie](#)
Subject: Comments for 11.17.2025
Date: Monday, November 17, 2025 3:12:03 PM
Attachments: [image.png](#)
[4.2.2025 COS WAG DSG ME.pdf](#)

CAUTION: This email originated from outside the Port. Please exercise caution.

Greetings Commissioners,

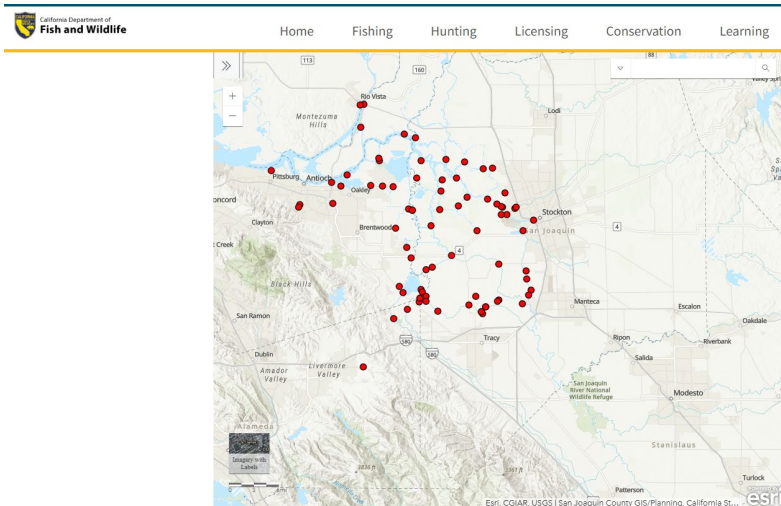
Thank you for posting the strategic plan update and we hope that the public will have involvement particularly relating to infrastructure improvements.

The news of the golden mussel growth in pipes is a concern to the public especially when the Port of Stockton relies on deep water channel/San Joaquin River for fire water.

What does the Port do to prevent invasive species contamination related to shipping?

All vessels that arrive at a California port must submit the Ballast Water Management Report (BWMR) 24 hours prior to arrival at each port in California. Does the Port verify that this report has been filed and fees paid?

Since 10.2024 when the Golden Mussel was first detected by state regulators, the organism has become more widespread being detected throughout the Delta as shown below from the California Department of Fish and Wildlife: <https://wildlife.ca.gov/Conservation/Invasives/Species/Golden-Mussel>



Shortly, after the detection of golden mussels at the Port of Stockton, the Delta-Sierra Group submitted comments on the NOP for an expansion of the now Nevada Cement LLC (formerly Lehigh Cement) and we are wondering when the DEIR for the expansion will be available for review?

I understand that some ports charge a "tipping fee" that is used to fund environmental improvements and we wonder whether or not that is something that the Port of Stockton has discussed?

We have attached 4.2.2025 correspondence to the City of Stockton Water Advisory Group which includes comments on the Boggs Tract Stormwater Improvement Project which was recently presented to the City of Stockton Council Water Committee. We wonder if the Port of Stockton is involved with the proposed improvements?

Please feel free to contact me at mebeth@outlook.com to discuss our concerns further.

Thank you.

Mary Elizabeth, M.S., R.E.H.S.



City of Stockton Water Advisory Group
City of Stockton Council and Mayor Fugazi
425 North El Dorado Ave Stockton CA 95202
via email: city.clerk@stocktonca.gov

4.2.2025

RE: City of Stockton Water Advisory Group (WAG) 4.2.2025 Meeting Comments for the Record

The Delta-Sierra Group of the Sierra Club (DSG) has prepared comments for your information including some recommended actions. Correspondence submitted to the Eastern San Joaquin Groundwater Authority dated 2.11.2025 has also been attached to the email submittal.

Non-agenda PUBLIC Comments

The WAG approval and the recommendation that the City of Stockton Water Council approve the draft Eastern San Joaquin Groundwater Sustainability Plan Amendment (2024) on 10.2.2024 occurred when the draft report was only a draft **without any stakeholder engagement section** that is required under the Sustainability Groundwater Management Act administered by the California Department of Water Resources (DWR) and State Water Resources Control Board. The City of Stockton Groundwater Sustainability Agency failed to have a public hearing, with the 2024 Council Water Committee approving on 10.10.2024 the draft **without a stakeholder engagement section** for submittal to DWR. The Eastern San Joaquin Groundwater Authority Board which includes a representative from the City of Stockton Groundwater Sustainability Agency approved the Final Eastern San Joaquin Groundwater Sustainability Plan Amendment including the final stakeholder engagement section on 12.11.2024 including DSG comments for submittal to DWR.

Changes in the draft of both the Groundwater Sustainability Plan Amendment and stakeholder engagement were submitted to DWR in January 2025 and approved by the City of Stockton Groundwater Sustainability Agency at a public hearing on March 18, 2025. During that meeting there was a question as to whether the WAG had seen the final before the public hearing, so we are surprised that the final with the **stakeholder engagement section** was not immediately presented to the WAG. The DSG correspondence on the draft stakeholder engagement section was previously submitted to the WAG. Stakeholder engagement is the responsibility of groundwater sustainability agencies. The City of Stockton Groundwater Sustainability Agency stakeholder outreach requires improvement so as to comply with the referenced Water Code sections in the final 2024 Communication and Engagement Plan – stakeholder engagement plan.

We recommend that the 2024 Eastern San Joaquin Subbasin Communication and Engagement Plan be an item for discussion at the next WAG meeting and that City staff provide a presentation about how the City of Stockton Groundwater Sustainability Agency will comply with stakeholder engagement requirements.

ITEM 4.1: 25-0253 Approval of Minutes PUBLIC Comments

Mary Elizabeth, Conservation Chair of the Delta-Sierra Group of the Sierra Club (DSG) submitted written comments on 2.5.2025 conveying DSG communications because she is unable to attend

meetings in person due to work obligations. The 4.2.2025 WAG agenda includes minutes from the 2.5.2025 WAG meeting that reports that no public comments were received.¹

We are very concerned about this pattern of not including written comments for some City of Stockton meetings. A receipt was received that the comments were received, and these may or may not have been distributed as there is no record of the comments being submitted. We have included these comments as attachments which also includes the 12.5.2025 DSG correspondence regarding comments on the draft stakeholder engagement plan that an amendment to the 2.5.2025 minutes was made during the meeting, including the 2.5.2025 submittal.

We recommend that the 2.5.2025 WAG Minutes not be approved as submitted and that an amendment be made to include the attached comments submitted by Mary Elizabeth 2.5.2025 along with the receipt received from the City of Stockton and a notation be made in the 4.2.2025 minutes that an amendment had been made during the meeting.

ITEM 7.1: 25-0412 PRESENTATION ON THE MUD STORMWATER Master Plan PUBLIC Comments

The January 2023 MUD Stormwater Master Plan was submitted to the City of Stockton Council for adoption 3.7.2023 without much opportunity to review the contents, though it was approved by the City Council Water Committee on 2.9.2023 during the 41 minute meeting.

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07/14/22 Regular Meeting

06/09/22 Regular Meeting

01/13/22 Regular Meeting

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10/04/23 Regular Meeting

05/03/23 Regular Meeting

10/05/22 Water Advisory Group - Cancelled due to lack of a quorum

09/07/22 Special Meeting

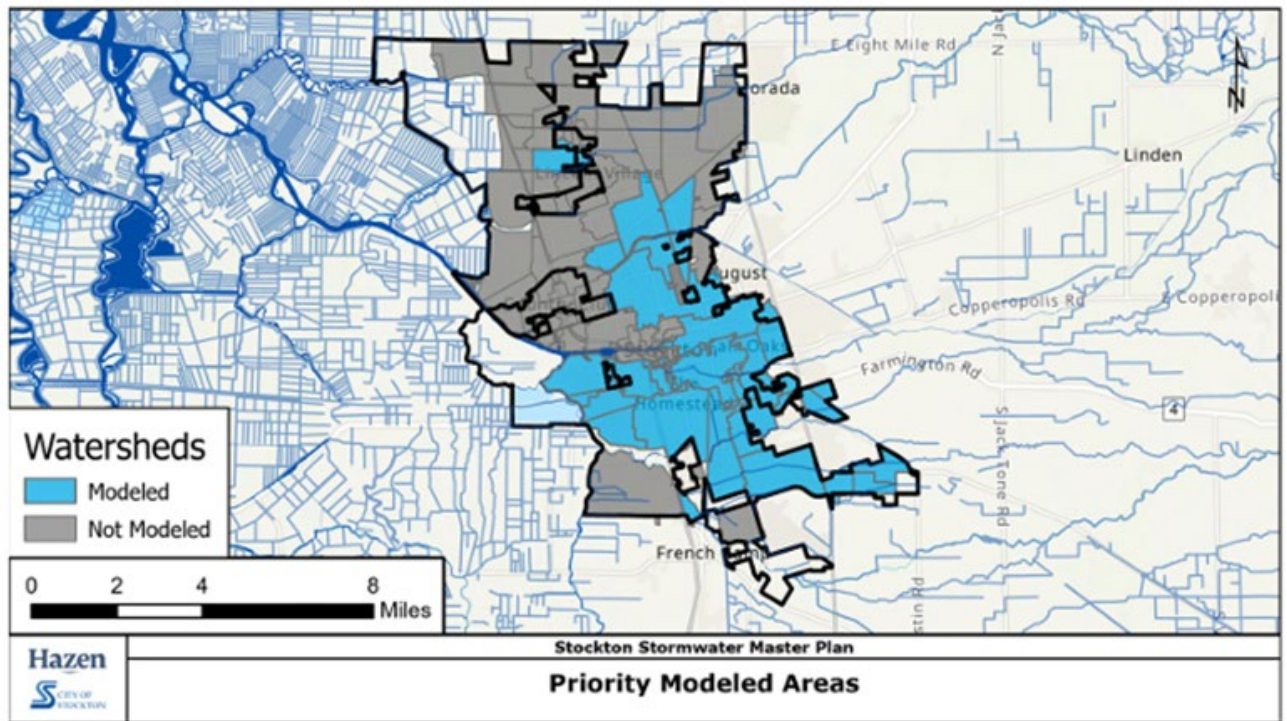
07/06/22 Regular Meeting

01/05/22 Regular Meeting

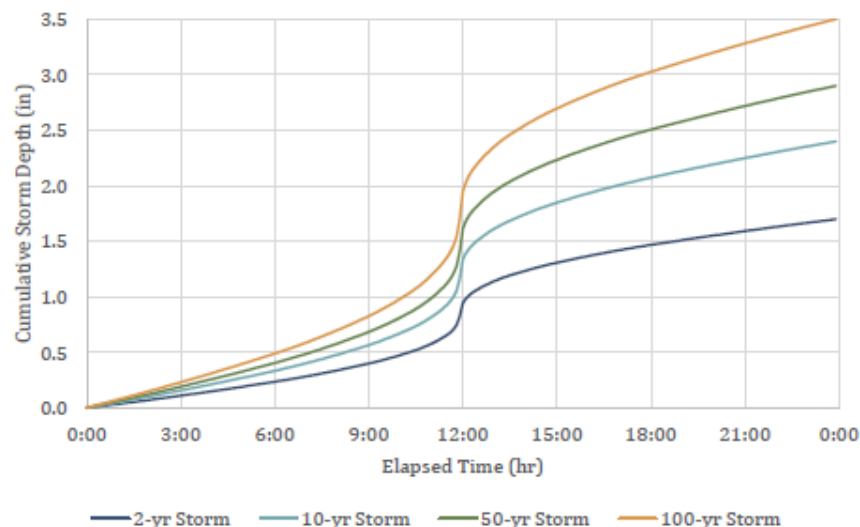
There are several concerns regarding the use of the 10-yr, 24-hr design storm event, which even though is consistent with existing City standard these data are not updated with anticipated changes related to climate change. The location and extent of areas of study for hydrologic-hydraulic modeling were established and prioritized in coordination with City staff to evaluate areas of known

¹ [Attachment A Minutes 2.5.2025 WAG.pdf](#)

flooding concerns and areas of anticipated future development as shown below. The 2023 Stormwater Master Plan considered the City's stormwater infrastructure and 10-yr, 24-hr storm event. Whether or not large warehousing projects like the Mariposa I and II and South Stockton Commerce Center were included in the analyses is not certain nor if any of the recommended routine infrastructure maintenance has been performed.



The total rainfall depths from the Stockton Metropolitan Airport rain gage were used by the Hazen-MUD model and fitted to a NOAA California Type II distribution as shown in the figure below. Rainfall characteristics were assumed to be spatially uniform across the City of Stockton.

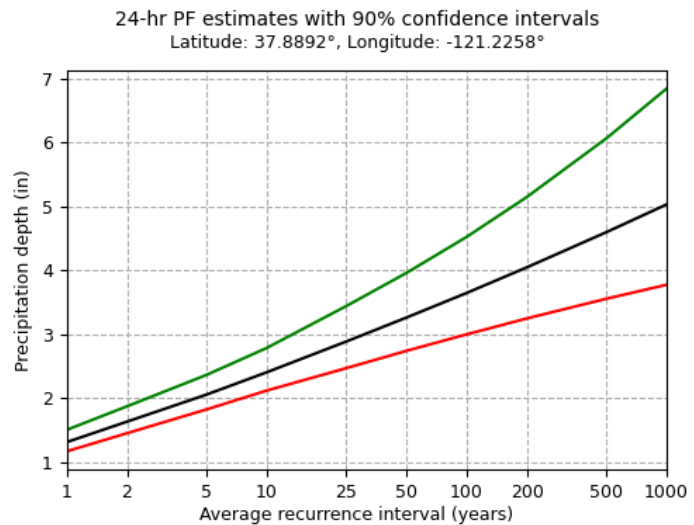


The public can readily access the NOAA Atlas 14 Volume 6, Version 2 which is the most current version of Atlas 14 was accessed for the Stockton Metropolitan Airport data and showed the following estimates which include an upper and lower band for the 90% confidence interval.²

² https://hdsc.nws.noaa.gov/pfds/pfds_map_cont.html?bkmrk=ca

The 12.31.2022 storm which flooded many areas of Stockton was a result of a 24-hour rain total of 2.85 inches that was greater than the largest overall storm recorded over the Hazen-MUD modelled period from 2010 to 2020 which was 2.35 inches occurring on 12.11.2014.

The modeling efforts reported in the January 2023 Stormwater Master Plan were based on existing conditions and future development identified by City staff and the 2040 General Plan with some uncertainties requiring additional investigation. The December 2022 storm exceeded projected 10 year 24-hour storms as shown using the NOAA Atlas 14 Volume 6, Version 2 model of Stockton Metropolitan Airport precipitation data.



NOAA Atlas 14, Volume 6, Version 2

Created (GMT): Wed Apr 2 02:50:48 2025

PDS-based precipitation frequency estimates with 90% confidence intervals (in inches) ¹										
Duration	Average recurrence interval (years)									
	1	2	5	10	25	50	100	200	500	1000
5-min	0.103 (0.091-0.119)	0.137 (0.120-0.157)	0.180 (0.158-0.208)	0.216 (0.187-0.252)	0.265 (0.220-0.322)	0.303 (0.245-0.378)	0.341 (0.268-0.440)	0.381 (0.289-0.509)	0.436 (0.313-0.613)	0.479 (0.330-0.702)
10-min	0.148 (0.131-0.170)	0.196 (0.172-0.225)	0.258 (0.226-0.298)	0.310 (0.268-0.361)	0.380 (0.315-0.461)	0.434 (0.351-0.542)	0.489 (0.384-0.630)	0.546 (0.414-0.729)	0.625 (0.449-0.878)	0.686 (0.472-1.01)
15-min	0.179 (0.158-0.206)	0.237 (0.208-0.272)	0.312 (0.274-0.360)	0.374 (0.325-0.436)	0.459 (0.381-0.558)	0.525 (0.424-0.655)	0.592 (0.464-0.762)	0.661 (0.500-0.882)	0.756 (0.543-1.06)	0.830 (0.571-1.22)
30-min	0.245 (0.216-0.281)	0.323 (0.284-0.371)	0.426 (0.374-0.491)	0.511 (0.443-0.595)	0.626 (0.520-0.762)	0.716 (0.579-0.894)	0.807 (0.633-1.04)	0.902 (0.683-1.20)	1.03 (0.741-1.45)	1.13 (0.780-1.66)
60-min	0.344 (0.303-0.394)	0.454 (0.399-0.521)	0.599 (0.525-0.690)	0.717 (0.622-0.836)	0.880 (0.731-1.07)	1.00 (0.813-1.26)	1.13 (0.889-1.46)	1.27 (0.959-1.69)	1.45 (1.04-2.04)	1.59 (1.10-2.33)
2-hr	0.478 (0.421-0.548)	0.586 (0.516-0.674)	0.738 (0.647-0.851)	0.869 (0.754-1.01)	1.06 (0.881-1.29)	1.22 (0.984-1.52)	1.38 (1.09-1.78)	1.57 (1.19-2.09)	1.83 (1.32-2.58)	2.05 (1.42-3.01)
3-hr	0.562 (0.495-0.644)	0.674 (0.593-0.775)	0.836 (0.732-0.963)	0.978 (0.848-1.14)	1.19 (0.968-1.45)	1.37 (1.10-1.71)	1.56 (1.22-2.01)	1.78 (1.34-2.37)	2.09 (1.50-2.94)	2.36 (1.63-3.47)
6-hr	0.748 (0.659-0.857)	0.881 (0.775-1.01)	1.08 (0.942-1.24)	1.25 (1.08-1.46)	1.51 (1.26-1.84)	1.73 (1.40-2.16)	1.98 (1.55-2.55)	2.26 (1.71-3.02)	2.68 (1.92-3.76)	3.04 (2.09-4.45)
12-hr	0.953 (0.839-1.09)	1.15 (1.01-1.32)	1.42 (1.24-1.64)	1.65 (1.43-1.92)	1.99 (1.65-2.42)	2.26 (1.83-2.82)	2.56 (2.00-3.29)	2.87 (2.17-3.83)	3.33 (2.39-4.68)	3.70 (2.55-5.43)
24-hr	1.31 (1.17-1.50)	1.63 (1.45-1.87)	2.06 (1.82-2.36)	2.40 (2.12-2.78)	2.89 (2.47-3.44)	3.26 (2.74-3.96)	3.65 (3.00-4.52)	4.05 (3.25-5.15)	4.60 (3.56-6.07)	5.03 (3.77-6.85)
2-day	1.63 (1.45-1.87)	2.01 (1.79-2.31)	2.52 (2.24-2.90)	2.94 (2.59-3.41)	3.53 (3.02-4.21)	3.99 (3.35-4.84)	4.46 (3.67-5.54)	4.96 (3.98-6.31)	5.65 (4.37-7.46)	6.20 (4.65-8.44)
3-day	1.83 (1.63-2.10)	2.24 (1.99-2.57)	2.79 (2.48-3.21)	3.25 (2.86-3.77)	3.90 (3.33-4.65)	4.41 (3.70-5.35)	4.94 (4.06-6.13)	5.50 (4.41-6.99)	6.28 (4.86-8.29)	6.90 (5.18-9.40)
4-day	2.01 (1.79-2.31)	2.46 (2.18-2.82)	3.05 (2.71-3.51)	3.55 (3.13-4.12)	4.25 (3.64-5.07)	4.80 (4.04-5.84)	5.38 (4.42-6.67)	5.98 (4.80-7.61)	6.83 (5.28-9.01)	7.50 (5.63-10.2)
7-day	2.45 (2.18-2.81)	2.99 (2.66-3.43)	3.70 (3.28-4.26)	4.29 (3.78-4.97)	5.10 (4.36-6.08)	5.73 (4.82-6.96)	6.38 (5.25-7.92)	7.06 (5.66-8.98)	7.99 (6.18-10.5)	8.72 (6.54-11.9)
10-day	2.74 (2.44-3.14)	3.35 (2.98-3.84)	4.14 (3.68-4.76)	4.79 (4.22-5.55)	5.67 (4.85-6.76)	6.34 (5.33-7.70)	7.03 (5.78-8.72)	7.74 (6.20-9.84)	8.69 (6.72-11.5)	9.44 (7.08-12.8)
20-day	3.62 (3.23-4.15)	4.48 (3.98-5.14)	5.55 (4.93-6.39)	6.40 (5.64-7.41)	7.51 (6.42-8.95)	8.33 (7.00-10.1)	9.14 (7.51-11.3)	9.94 (7.98-12.6)	11.0 (8.50-14.5)	11.8 (8.84-16.0)
30-day	4.31 (3.84-4.94)	5.38 (4.78-6.17)	6.68 (5.93-7.68)	7.68 (6.77-8.90)	8.96 (7.67-10.7)	9.88 (8.30-12.0)	10.8 (8.86-13.4)	11.6 (9.34-14.8)	12.7 (9.86-16.8)	13.6 (10.2-18.4)
45-day	5.34 (4.76-6.12)	6.70 (5.96-7.69)	8.34 (7.40-9.58)	9.56 (8.42-11.1)	11.1 (9.48-13.2)	12.1 (10.2-14.8)	13.2 (10.8-16.3)	14.1 (11.3-18.0)	15.3 (11.8-20.2)	16.2 (12.1-22.0)
60-day	6.36 (5.66-7.28)	8.00 (7.12-9.18)	9.94 (8.82-11.4)	11.4 (10.0-13.2)	13.1 (11.2-15.6)	14.3 (12.0-17.4)	15.4 (12.7-19.1)	16.5 (13.2-21.0)	17.8 (13.7-23.4)	18.6 (14.0-25.4)

¹ Precipitation frequency (PF) estimates in this table are based on frequency analysis of partial duration series (PDS). Numbers in parenthesis are PF estimates at lower and upper bounds of the 90% confidence interval. The probability that precipitation frequency estimates (for a given duration and average recurrence interval) will be greater than the upper bound (or less than the lower bound) is 5%. Estimates at upper bounds are not checked against probable maximum precipitation (PMP) estimates and may be higher than currently valid PMP values. Please refer to NOAA Atlas 14 document for more information.

The 2023 Stormwater Master Plan stated that MUD staff and other key stakeholders possess knowledge about existing drainage concerns, future development plans, and stormwater infrastructure details that may not be captured in existing documentation. Regular progress meetings throughout the duration of 2023 Stormwater Master Plan development were utilized to capture some of this institutional knowledge and vet assumptions and preliminary results with MUD staff. The results of these regular progress meetings were not reported to the WAG nor were residents of the City of Stockton able to provide any input during the Stormwater Master Plan development.

The Stormwater Master Plan indicated that the evaluations only considered and mitigated localized downstream impacts up to the point where stormwater is discharged to a receiving water and that the efforts did not directly consider the capacity of that receiving water itself. Additional analysis was recommended to understand the physical and regulatory capacity of these receiving waters to accept increased runoff discharges. Furthermore, the Stormwater Master Plan included statements that validation of the stormwater network characteristics in the future would be necessary as part of more detailed planning and design effort which could be accomplished by the deployment of targeted water level loggers in the conveyance system near terminal pump stations and in areas known to flood. Whether or not efforts to collect these data have been initiated is unknown. Once additional data is obtained stakeholder and regulatory agency coordination is thought to be an essential aspect to establish consensus on modeling approach and characterization of potential impacts which hopefully will include the WAG.

As the Hazen-MUD modeling was based on Atlas 14, this modelling effort will have limited value after Atlas 15 is released by NOAA. Atlas 15 will be the authoritative source for precipitation frequency information across the United States and represents a departure from the current approach which bases extreme precipitation events on past events. Atlas 15 will be able to anticipate changing extreme precipitation frequency anticipated based on climate change observations. When this model is available in 2027 engineering standards that use depth-duration frequency or intensity-duration frequency curves for sizing infrastructure will change.³

The Stormwater Master Plan also included a lengthy discussion of stormwater fees and money needed to pay for the priority projects identified by MUD and other stakeholders – not the WAG. It is interesting that they calculated the if inflation were accounted for that the 1992 existing monthly fee of \$2.10 would be \$4.23 per equivalent residential unit. None of the development fees that the City charges for public facilities such that developers pay their own way have changed since 2010, leaving residents to pay for development impacts.

The presentation prepared for the 4.2.2025 WAG meeting included a very brief high-level overview of the Stormwater Master Plan and potential future projects as shown including in Boggs Tract while acknowledging that new development often creates or exacerbates flooding.⁴

Project	Cost	Priority
Boggs Tract	\$17,144,585	High
Bonnie Brook	\$11,547,232	High
Hwy 4 and San Joaquin	\$24,902,729	High
Walker Turnpike Alt 1 *	\$46,204,468	High
Walker Turnpike Alt 2 + Eighth St and San Joaquin *	\$75,142,287	High
Bianchi and Calaveras	\$30,682,180	Medium
Duck Creek	\$12,061,203	Medium
Legion Park and Smith Canal	\$50,864,178	Medium
Deep Water	\$10,229,853	Low
Little Johns	\$4,552,126	Low
Mormon Slough	\$27,524,026	Low
Sutter and Calaveras River	\$13,710,877	Low
West Lane and Calaveras River	\$6,517,147	Low

** Denoted projects are alternatives and would not both be implemented*

We are surprised that Boggs Tract is included as a high priority as the residential area is mostly San Joaquin County and the whole area is included in Reclamation District 404. Reclamation districts are a form of special district -purpose districts which are responsible for reclaiming and/or maintaining land that is threatened by permanent or temporary flooding for agriculture, residential, commercial or industrial use. Historically, the land is reclaimed by removing and/or preventing water from returning via systems of levees, dikes, drainage ditches, and pumps. This information is from the San Joaquin LAFCO.⁵ Reclamation District 404 is mostly within the City of Stockton; however, it includes an unincorporated island with a median household income that qualifies as a DUC. The island receives water from Cal Water a private company and fire protection from the Boggs Fire Protection District which has a

³ <https://water.noaa.gov/about/atlas15>

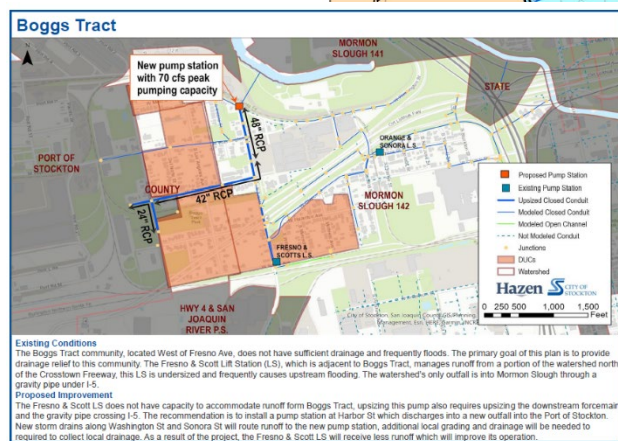
⁴ [Stormwater Master Plan Presentation 4.2.2025.pdf](#)

⁵ <https://www.sjlafco.org/reclamation-districts>

contract with the Stockton Fire Department. There is no sewer service, so residents are on septic systems.

Reclamation District 404 provides levee maintenance services. The boundary area includes about 2,130 acres or 3.3 square miles and is bounded to the west by the San Joaquin River, to the north by the Stockton Deep Water Channel, and to the south by French Camp Slough and Walker Slough. According to LAFCO no drainage or irrigation water services are provided.⁶

There was no indication as to whether or not the San Joaquin County Board of Supervisors has been approached to fund any of the proposed improvements. How these proposed priority projects are to be funded did not include an analysis of the use of the utility tax that residents of Stockton pay.



Item 7.3: 25-0411 Introduction to the Quarterly Operations Report Public Comment

The City of Stockton staff is well aware of the purposes and history of the WAG and so explaining to the WAG about the contents of the required operational report seems unnecessary when a contemporary report should have been available. According to the City of Stockton webpage (https://www.stocktonca.gov/services/municipal_utilities/index.php#collapse703b0) the most recent operational report is for April-June 2023 (QOR.pdf).

We recommend that regular operational reports, including ESJGWA updates, should be provided to the Water Advisory Group, Council Water Committee, and the City Council, which is the governing body of the City of Stockton Groundwater Sustainability Agency. Additionally, previews of upcoming studies and projects that are already in the bidding process such as the Urban Water Management Plan, Watershed Sanitary Survey project and the WWTP Co-generation Redundancy project should be discussed and draft reports made available for WAG comments.

Thank you for your consideration You may contact me at mebeth@outlook.com.

Sincerely,

Mary Elizabeth M.S., R.E.H.S.

Attachments: DSG 2.11.2025 Correspondence with attachments
MElizabeth 2.5.2025 Correspondence with attachments

⁶ <https://www.sjlafco.org/files/bd11de692/selected-reclamation-districts---march-2018.pdf>