



California Regional Water Quality Control Board

Central Valley Region



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Comments on the Notice of Preparation of the Draft Environmental Impact Report for the *Port of Stockton West Complex Development Plan*

Below please find Central Valley Regional Water Quality Control Board (CVRWQB) comments on the Notice of Preparation of the Draft Environmental Impact Report (EIR) for the *Port of Stockton West Complex Development Plan*.

1. The Stockton Deep Water Ship Channel (DWSC) has been listed as impaired due to low dissolved oxygen (DO) between the Turning Basin and Disappointment Slough pursuant to Clean Water Act, Section 303(d). Prior DWSC dredging operations were shown by the U.S. Army Corps of Engineers to worsen existing low DO problems in the DWSC, and required mitigation. (*U.S. Army Corps of Engineers, Finding of No Significant Impact, San Francisco Bay to Stockton Ship Channel: Dissolved Oxygen Mitigation Implementation, May 25, 1990*). The proposed EIR must address any dredging for the proposed project that may worsen the existing low DO problem, regardless of magnitude.
 - The EIR needs to compare the proposed cross-section bathymetric profiles against the existing bathymetric profiles for the entire reach of the DWSC that will be affected by dredging.
 - The EIR needs to describe how any potential worsening of an existing 303(d) impairment caused by the proposed project can be reconciled against applicable Federal and State environmental regulations including, but not limited to, those under the Federal Clean Water Act, the California Porter-Cologne Water Quality Control Act, and the California Environmental Quality Act (CEQA).
 - Since May 1983 the California Department of Water Resources has maintained and operated a continuous multi-parameter monitoring station at Rough & Ready Island. The EIR needs to consider how the proposed project will impact the continuity of future data from this meter with the 19 years of historical data already being used to study and solve the DO problem in the DWSC.

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2. The EIR must discuss the cumulative impacts of the proposed project, taking into consideration the effects of past, current and probable future projects (CEQA Guidelines §15065(c) and §15130). The EIR must consider how the DWSC operations and channel configuration downstream of the Port of Stockton will support the type of ship traffic that this proposed project is designed to accommodate. If the existing operation or channel configuration downstream of the Port of Stockton is not completely adequate to support the intended use of the proposed project, then any required or possible future modifications to the DWSC that may result from this proposed project must be considered as well.
3. The EIR needs to address impacts to water quality conditions in the DWSC from storm water discharges generated by the proposed project.

Thank you for the opportunity to provide comments prior to the preparation of this EIR. If there are any questions regarding these comments please contact me at (916) 255-6317 or Chris Foe (916) 255-3113.

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cc: Mary Hildebrand, Chair, DO TMDL Steering Committee
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