

Restore the Delta
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City of Stockton
Attn: Stockton MSA CCAAP Team
425 N. El Dorado St.
Stockton, CA 95202

Sent via email.

May 1, 2026

Dear Stockton MSA CCAAP Team:

Restore the Delta is a 501c3 nonprofit organization working in the areas of public education, research, program and policy development, and outreach so that all Californians recognize the Sacramento-San Joaquin Bay Delta as part of California's natural heritage, deserving of restoration. We interface with local, state and federal agencies to advance this vision.

We are coalition builders, climate and water policy experts, farmers, researchers, and San Joaquin Delta residents tackling deep systemic challenges in our community. For the past 19 years, we've partnered with Delta tribes, farmers, and disadvantaged communities to chart a sustainable economic future for the Delta. We envision a Delta region with fishable, swimmable, farmable, and drinkable waters; regenerative agriculture practices honoring family farms; restoration rooted in traditional ecological knowledge in partnership with tribes; and abundant community wealth building opportunities. Our work finds us in government planning spaces advocating for water quality, flood and drought protections; out on Delta waterways monitoring water quality and hazardous algal blooms; developing strategies with farmers and landowners to reverse island subsidence; and assessing new energy and carbon management technologies being proposed in the region for environmental protections and community benefit.

Restore the Delta respectfully writes in support of the City of Stockton's Comprehensive Climate Action and Adaptation Plan ("CCAAP"), and provides input and recommendations on the sections regarding carbon sequestration, water supply, energy, and restoration efforts. First and foremost, we appreciate the City's recognition that the CCAAP itself cannot succeed without local implementors, partners, and champions, and stand ready to collaborate with the City on community-led climate actions. We appreciate the detailed analysis surrounding the vulnerabilities of communities across Stockton, as well as efforts the City can take to ensure Stockton is prepared for the impacts of climate change. It's important to highlight the most vulnerable communities, and those investments should be prioritized. Our primary recommendation is that the plan should highlight ongoing local efforts to mitigate the impacts of climate change, and expand upon existing programs to ensure Stockton communities are protected.

Climate Vulnerability

The CCAAP relies heavily on data from the Climate and Economic Justice Screening Tool (CEJST), which leverages census tract data with numerous climate criteria. This is an important tool in understanding climate vulnerability to the region, however other tools including CalEnviroScreen 5.0 provide additional perspectives and analyses that could be used to inform some of the recommendations captured in the CCAAP. A high-level overview of the CEJST and explanation for why the CCAAP depended upon this tool would be helpful to better understand the underlying data and resources informing the climate vulnerability assessment and subsequent recommendations.

The Plan itself identifies key areas across Stockton that are more vulnerable to extreme heat, a rising concern in the face of temperature changes associated with climate change. Included in the most vulnerable locations are numerous areas along the Mormon Slough (i.e. Garden Acres, Morada/Holman). Restore the Delta in partnership with the Mormon Slough Restoration Association (MSRA) have embarked on an effort to restore the slough. The MSRA is a participatory planning body of Tribal governments, public agencies, and NGOs spanning public health equity, arts, youth and workforce development, environmental advocacy, faith-based, and business development organizations collaborating on a vision for the slough as a greenway with pocket parks – one that honors the land, its ancestors, and the people who live there. The MSRA has begun design and planning processes for the revitalization of two pilot sites along the slough, with long-term restoration goals spanning the full 6.3 miles of the slough. The goal is to restore the slough as an economic and recreational asset, flood control mechanism, and a climate vulnerability asset that will enhance the quality of life for South Stockton community members.

We encourage the City of Stockton to consider incorporating the Mormon Slough Restoration Project into the CCAAP as a specific project that can reduce climate vulnerabilities, like extreme heat and flood risk, and bring numerous additional community benefits. Specifically, the project could be incorporated under multiple climate actions in chapter 7, including AD07, AD10, AD13, AD14, AD17, and AD23. Additionally, we suggest the Mormon Slough Restoration Project be included in final CCAAP as one of the 20 priority actions for action costing (7.2.3 Cost of Actions).

We are also supportive of AD04 (Establish a multilingual climate hazards alert system), and recommend adding one metric for tracking progress: the amount of funding spent contracting with community-based organizations to support translation and interpretation services.

In addition, we recommend under AD03 (Pursue Funding to Implement Adaptation Project) to consider creative municipal financing mechanisms such as [Climate Resilience Districts](#), to ensure sustainable funding for maintenance of climate infrastructure assets over time.

Water Supply

Restore the Delta supports efforts to conserve water as a climate vulnerability strategy. As California experiences extreme precipitation events, reduced snowpack, and extended dry periods, it is important to identify ways to meet urban and agricultural demand. Under 7.6.13 AD14, we support continued efforts for groundwater recharge. We recommend highlighting the progress already made, primarily in the development of the Delta Water Treatment Plant (DWTP)'s groundwater recharge project. By promoting ongoing projects, the CCAAP can draw a clear line to meeting the goals outlined in the plan.

Carbon Removal

The CCAAP section 4.3 highlights numerous strategies for carbon sequestration and reduction in emissions. Restore the Delta uplifts nature based solutions, including tree planting and increased green spaces, as a strategy to reduce carbon in the atmosphere. However, we believe this section could be strengthened given that Stockton and the surrounding Delta is targeted for development of engineered carbon removal technologies. That includes proposals for Direct Air Capture facilities and several Class VI CO₂ Injection well applications currently under review by the U.S. Environmental Protection Agency.

We encourage the CCAAP to acknowledge and distinguish between Mitigative Carbon Capture and Storage (CCS), which captures point source industrial emissions and decarbonizes hard to abate sectors, and Carbon Dioxide Removal (CDR), which removes legacy emissions directly from the atmosphere. For any engineered CDR (such as Direct Air Capture) with large industrial footprints, we urge the city to require community-led mitigation and benefits planning, in partnership with community-based organizations.

Energy

Energy demands continue to rise across the state, and we agree that addressing these energy and associated cost challenges is crucial to a more resilient Stockton. In addition to the vulnerabilities associated with climate, Restore the Delta also highlights the increasing demand from emerging technologies and industrial development, including data centers serving Artificial Intelligence (AI) loads (i.e. hyperscale cloud data centers), bioenergy projects, and previously proposed hydrogen projects. The CCAAP should evaluate the impact of these emerging technologies on our energy and water systems, as well as the direct impact to communities. If this plan is intended to support mitigation strategies early, it should consider the full breadth of influences.

The City has a chance now to articulate a position on data center development and other energy-adjacent infrastructure such as pipelines, that prioritizes local economic, environmental, and community benefits, rather than reacting project-by-project, as has been tradition with warehousing development over the past several decades. We recommend inclusion in the CAAP a directive to the City to develop a land use ordinance articulating zoning, permitting, and development priorities for hyperscale cloud data centers. Such a process could consider guardrails for environmental, workforce, and economic impacts, such as energy sourcing

requirements; water usage restrictions; setbacks from residential areas; community benefits funding; project labor agreements; and other issues within the City's jurisdictional purview.

Additionally, we recommend removing EG3 under 7.7 Additional CCAAP Actions, which calls for the City of Stockton to join Ava Community Energy, as the City has already enrolled with Ava as the default energy provider for local residents and businesses.

Conclusion

Restore the Delta appreciates the City of Stockton's in-depth analysis of risks associated with a changing climate, as well as the extensive list of recommended actions. We encourage the City to consider Restore the Delta's input and recommendations to strengthen the CCAAP, and provide opportunities to build on existing community projects.

Sincerely,

Morgen Snyder
Director of Policy & Programs
Restore the Delta

Davis Harper Zapata
Director of Strategic Planning
Restore the Delta