

TERRA LAND GROUP, LLC

July 17, 2018

VIA EMAIL

State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814
Attn: Jeanine Townsend
Clerk to the Board
(comments@waterboards.ca.gov)

Re: Comment Letter - Revisions to Proposed Bay-Delta Plan Amendments.

Dear Board Members,

My name is Martin Harris and I am an authorized representative for Terra Land Group, LLC ("TLG"). TLG owns several properties located in Manteca and Lathrop. As an organization, TLG devotes many of its efforts to ensuring the safety of our community by urging local and state authorities to pursue flood mitigation efforts when moving forward with any projects affecting drainage in and along the South Delta/Lower San Joaquin River Basin.

On March 14, 2017, TLG submitted written comments in the form of a letter which is included in the Enclosures attached. (**See Enclosure 1**) The March 14, 2017 letter expressed concern related to the proposed unimpaired flows and the potential for higher flood and other hydrology related impacts affecting the South Delta/Lower San Joaquin River Basin due to the effects of cumulative impacts when compared to the current rate of City of Manteca urbanization and expansion.

Since the time that TLG wrote the March 14, 2017 letter, the City of Manteca has appeared to have completely ignored public outcry related to South Manteca rural flood concerns while continuing to approve a high volume of development projects. Further, it is TLG's firm belief that these projects have been approved without completing proper environmental reviews and/or securing the critical but currently unidentified public services infrastructure necessary to support: (i) storm water discharge, (ii) effluent wastewater spray field discharge, (iii) groundwater sustainability through percolation and recharges, and (iv) traffic circulation, as well as any and all California Senate Bill No. 5 ("SB5") flood protection and drainage improvements necessary to accommodate the rapid pace of development affecting both the urban and rural developing and non-developing areas of our local communities. (**See Enclosure 2.** Also **See Enclosure 3** to gain a better understanding of the flood and other hydrology related impacts involved.)

This is especially important when you consider known channel flow deficiencies in and along the South Delta/Lower San Joaquin River Basin that remain unaddressed in relation to how increased levels of sedimentation and vegetative overgrowth currently existing in and along the San Joaquin

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River (and associated tributaries) will be mitigated or even considered. (Within **Enclosure 3**: 02/26/2018 letter to SJAFCA, see its own Enclosure 3: 04/20/2017 letter to SJCBS.) This causes TLG to believe that flood impacts to the non-developing rural areas may increase significantly.

Concerns are escalated when you consider that the State Water Resources Control Board plans to allow annual February through June unimpaired flows along the San Joaquin River as measured at the Vernalis monitoring station that may reach 46,000 cubic feet per second in total flow capacity. (See pages 4-14 through 4-21 of the San Joaquin River Basin-Wide Feasibility Study, published in March 2017.)

The 1997 flood began with high volume discharges from upstream reservoirs draining along and through the San Joaquin River (and associated tributary) channels in late December 1996 before breaching the San Joaquin River levee at several locations in January. Therefore, TLG can only believe that the combination of holding significant volumes of water in reservoirs upstream prior to releasing what appears to be higher amounts of water than the San Joaquin River (at Vernalis) can safely handle has the makings of a disaster that could reach catastrophic proportions. (Within **Enclosure 3**: 02/26/2018 letter to SJAFCA, see its own Enclosure 1 which contains a list of letters and related items. This list contains information that TLG believes is relevant and important to consider. Please note Item 24: 05/31/2017 letter to John Maguire, Item 25: 05/16/2017 letter to MCC, Item 26: 05/12/2017 letter to John Maguire, and Item 28: 04/20/2017 letter to the SJCBS.)

For this reason, TLG initiated and continues to implement a letter writing campaign with letters and copies of those letters (and related items) being sent to many authorities that TLG believes may be affected. (Within **Enclosure 3**: 02/26/2018 letter to SJAFCA, see its own Enclosure 1 which contains a total of 39 of the over 250 letters that have been written by TLG to date.)

With this in mind, TLG believes that any attempt by the State Water Resources Control Board to consider the adoption of any of the proposed amendments to the Water Quality Control Plan that allows new and revised flow objectives for the Lower San Joaquin River and its tributaries (ie: the Stanislaus, Tuolumne and Merced Rivers) needs to allow for and mitigate any and all flood impacts involved.

Thank you for your attention to this very important matter.

Respectfully,



Martin Harris
for Terra Land Group, LLC.

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MH/cm

Enclosures:

Please Note: These Enclosures can be downloaded individually as needed through their corresponding Dropbox hyperlinks.

1. March 14, 2017 letter from TLG to the State Water Resources Control Board
(https://www.dropbox.com/s/wtrmiukoa73y3mm/2017-03-14_LTR_CASWRCB_FlowIncreasesStanTuolMercedRivers_MH_wEnc.pdf?dl=0)
2. July 16, 2018 Letter #1 from TLG to the Manteca City Council
(https://www.dropbox.com/s/5fle1kpwvzqhcc9/2018-07-16_LTR_MCC_LTR1AgItC2.pdf?dl=0)
3. February 26, 2018 letter from TLG to San Joaquin Area Flood Control Agency
(https://www.dropbox.com/s/8scnhemfwexbkr9/2018-02-26_LTR_SJAFCA_LSJR%20EIR_PublicComm_wEncl.pdf?dl=0)

cc:

San Joaquin Area Flood Control Agency, % Marlo Duncan, Project Manager
(marlo.duncan@stocktongov.com)
Central Valley Flood Protection Board, % Leslie Gallagher, Executive Officer
(leslie.gallagher@cvflood.ca.gov)
Tanis Toland, U.S. Army Corps of Engineers, Sacramento District
(Tanis.J.Toland@usace.army.mil)
Michael Mierzwa, Lead Flood Management Planner, California Department of Water Resources (michael.mierzwa@water.ca.gov)
Jon Ericson, Hydrology and Flood Operations Officer, California Department of Water Resources (jon.ericson@water.ca.gov)
California Department of Water Resources, Attn: Mary Jimenez
(mary.jimenez@water.ca.gov)
Manteca City Council, % Lisa Blackmon, City Clerk (lblackmon@ci.manteca.ca.us)
Lathrop City Council, % Teresa Vargas, City Clerk (website_cco@ci.lathrop.ca.us)
San Joaquin Flood Control and Water Conservation District, % Fritz Buchman
(fbuchman@sjgov.org)
San Joaquin County Resource Conservation District 3422 W. Hammer Ln. Ste. A
Stockton, CA 95219 (sjcrd@outlook.com)
American Rivers 2150 Allston Way, Suite 320 Berkeley, CA 94704 Attn: Aysha Massell,
Associate Director (amassell@americanrivers.org)
San Joaquin Local Agency Formation Commission, Attn: James Glaser (jglaser@sjgov.org)
San Joaquin County Board of Supervisors, % Mimi Duzenski (mduzenski@sjgov.org)
San Joaquin Council of Governments, % Diane Nguyen (nguyen@sjcog.org)
San Joaquin County Planning Commission, % Raymond Hoo, Deputy Director-Programs and
Administration (rhoo@sjgov.org)
Reclamation District No. 17, % Chris Neudeck (cneudeck@ksninc.com)
Reclamation District No. 2075, % Pam Forbus (pamforbus@sbcglobal.net)

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South San Joaquin Irrigation District Board of Directors, % Betty Garcia, Executive
Secretary/Clerk of the Board (bgarcia@ssjid.com)
Reclamation District No. 2094 Board Members, % Albert Boyce (albertboyce@gmail.com)

5151 E. ALMONDWOOD DRIVE MANTECA, CA 95337

From: Terra Land Group <terralandgroup@gmail.com>
Sent: Monday, July 23, 2018 8:31 AM
To: lsjr-sd-comments@waterboards.ca.gov; WQCP1Comments
Subject: Comment Letter - Revisions to Proposed Bay-Delta Plan Amendments
Attachments: 2018-07-17_LTR_SWRCB_BayDeltaPlan.pdf

Please see below. This email and the attached comment letter are being resent to the corrected email address. Please confirm receipt of this email.

Thank you,

Martin Harris
MH/cm

From: Terra Land Group <terralandgroup@gmail.com>
Sent: Tuesday, July 17, 2018 8:15 AM
To: comments@waterboards.ca.gov
Cc: marlo.duncan@stocktongov.com; leslie.gallagher@cvflood.ca.gov; 'Toland, Tanis J CIV CESPCK CESP (US)' <Tanis.J.Toland@usace.army.mil>; michael.mierzwa@water.ca.gov; jon.ericson@water.ca.gov; mary.jimenez@water.ca.gov; 'Blackmon, Lisa' <lblackmon@ci.manteca.ca.us>; website_cco@ci.lathrop.ca.us; fbuchman@sjgov.org; sjrcrd@outlook.com; amassell@americanrivers.org; 'Glaser, Jim' <jglaser@sjgov.org>; 'Duzenski, Mimi' <mduzenski@sjgov.org>; nguyen@sjcog.org; rhoo@sjgov.org; 'Chris Neudeck' <cneudeck@ksninc.com>; pamforbus@sbcglobal.net; 'Betty Garcia' <bgarcia@ssjid.com>
Subject: Comment Letter - Revisions to Proposed Bay-Delta Plan Amendments

Good Morning,

Attached please find a public comment letter dated July 17, 2018 from Terra Land Group, LLC to the State Water Resources Control Board Re: Revisions to Proposed Bay-Delta Plan Amendments.

Thank you,

Martin Harris
Terra Land Group
MH/cm

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