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January 7, 2021
VIA EMAIL

Mr. Brian Millar
San Joaquin County Community Development Department
1810 E. Hazelton Avenue
Stockton, Ca 95205

Re: Pre-Application Numbers PA-2100188 (TA), PA-2100189 (GP), PA-2100190 (SP), PA-2100191 (ZR) Dhan Suhk, Inc – Golden State Logistics Hub and Ancillary Uses Project

Dear Mr. Millar:

Thank you for the opportunity to provide comments and stay apprised of the various initial components of the above-referenced project.

As a California Water District and federal water service contractor, the jurisdictional responsibilities and expertise of the District are in the area of surface water management and distribution for agricultural purposes. The District also has jurisdictional responsibilities and expertise in the area of groundwater management, and has adopted an AB3030 “Groundwater Management Plan for the Northern Delta-Mendota Canal Subbasin”. It has also elected to form a local multi-agency Groundwater Sustainability Agency, the DM-II GSA, which serves as the exclusive GSA for the portion of the groundwater basin underlying its boundaries. The District further assists its agricultural landowners and water users in complying with the requirements of the California Regional Water Quality Control Board’s Irrigated Lands Regulatory Program (ILRP) for the Central Valley Region through its participation in the Westside San Joaquin River Watershed Coalition.

As the agency currently responsible for providing agricultural water service to approximately 954 acres of the lands in the 1,573-acre subject planning area, the current proposed Project raises several issues of serious, long-range importance and concern to the District. You are therefore advised that the District reserves the right to provide additional comment(s) to any future application components, and of course on any future EIR for the project, and may request that certain conditions be agreed to prior to final project approval.

Our immediate comments on the proposed Pre-Application are as follows:

Comment 1. The District would like further explanation regarding the intent or the considerations envisioned by the General Plan text amendment regarding the “potential

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long-term reductions in availability of irrigation supplies to farmland designated as prime farmland, farmland of statewide importance, unique farmland, farmland of local importance.”

Comment 2. While the Board of Directors reserves the right to make decisions on a case-by-case basis, as a general rule it is District policy that lands approved for urban, commercial or industrial uses will be concurrently detached from the District at landowner expense and will no longer receive water service from the District. The project boundaries as described will bi-furcate the San Joaquin County portion of lands served by the District. Should this occur, the District will require the project to provide updated legal descriptions and mapping for the area “post-project”.

Comment 3. The Application vaguely mentions that a Community Services District is envisioned. Please be advised that the boundaries of the DM-II Groundwater Sustainability Agency which serves De Puerto Water District are fully within the Delta-Mendota Subbasin, while the project area outside of the DPWD – DM-II boundary is in the Tracy Subbasin. In effect, the proposed project would the end up being a party to two Subbasins under the requirements for the Sustainable Groundwater Management Act, or would need to take action to have a boundary adjustment made for the CSD to be fully part of the Tracy Subbasin.

Comment 4. Of additional impact and serious concern is the fact that almost all of lands within the Project area currently support District operations and long-term water supply planning efforts through the payment of certain land-based charges. Detachment of these lands from the District and conversion to alternate uses without consideration of this effect will create a significant economic hardship on the District and its remaining landowners. You are advised that the District may seek certain and/or ongoing compensation to offset the economic impacts associated with detachment of District lands.

The District anticipates future opportunities to provide further comment, particularly on the scope and content of the environmental information to be included in the DEIR. The District requests to be kept informed as to any actions proposed or taken by the County with regard to District lands. If your office or the County has any questions or requires any additional information in this regard, please do not hesitate to contact us.

Very truly yours,



Anthea G. Hansen, General Manager

Cc: Board of Directors
Alan Doud, Esq.
San Joaquin County LAFCO

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Del Puerto Water District 2021 Crop Report Totals

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Crop	Acres
Alfalfa	
Almonds	21,994
Apples	
Apricots	1,649
Barley	
Beans, Dry	100
Beans, Processing	
Broccoli	223
Cantaloupe	433
Cauliflower	2
Cherries	1,910
Corn (Sweet/Fresh Market)	208
Corn (Silage)	25
Cotton, Pima	
Cotton, Upland	
* Electrical Switchyard	
* Fallow	7,256
Forage (Wheat)	1,181
Garlic	397
Grapes, Wine	522
Grapefruit	
Greens (Kale, Spinach, etc.)	
Herbs and/or Spices (Please Specify Type)	
Honeydew	
Irrigated Pasture	
Lemons/Limes	88
Lettuce	2
Mandarins	286
Melons (Please Specify Type)	
Crop Acres	36,276

Crop	Acres
* N/A	2,073
Oats	537
Olives	561
Oranges/Tangerines	27
Other Hay, Wheat	
Peaches	99
Peas, Processing	
Persimmons	29
Pistachios	242
Pluots	2
Pomegranates	
Pomelo	4
Pumpkins	
Rangeland	639
Silage or Ensilage	
Safflower	
Squash	4
Strawberries	
Sugar Beets	2
Tomatoes, Canning	1,709
Tomatoes, Fresh Market	2
Turf/Sod	
Vegetable Transplant Operation	402
Walnuts	1,136
Watermelon	270
Wheat	
Misc. Vegetable Crops	83
Compost	84
Worms	30
Crop Acres	7,935

Total Crop Acres	44,211
Double Cropped Acres	-396
Total District Acres	43,815

* Not Irrigated 9,329

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