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P.O. Box 1596 Patterson, CA 95363-1596

Phone (209) 892-4470 • Fax (209) 892-4469

January 30, 2024
VIA EMAIL

Mr. Prabhjot "Raja" Singh
1801 Lander Avenue
Turlock, CA 95380

Re: PLN2022-0085 Westley Triangle Truck Stop

Dear Mr. Singh:

The District has received an Early Referral Consultation letter regarding the proposed components of the above-referenced project on Stanislaus County APN 016-036-028.

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 the approximately 49 acres of land being proposed for development, the Project raises several issues of importance to the District, which should be addressed in the near-term in order to allow for a smoother process. As you may or may not know, the District has a policy which provides guidance for Landowners seeking to change the permitted uses of land within District boundaries to something other than Agricultural. Notwithstanding the Policy, which is attached for your review, the Board of Directors reserves the right to consider each project on a case by case basis. You are therefore advised that the District reserves the right to provide additional comment(s) to any future application components or proposed approvals, and of course on any future DEIR for the project, and may request that certain conditions be agreed to prior to final project approval.

Our immediate comments on the proposed Early Referral Consultation are as follows:

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Comment 1. 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. Should this occur, the District will require the project to provide updated legal descriptions and mapping for the area "post-project".

Comment 2. The early referral consultation does not provide much information about the source of water to serve the Project. Assuming that a well permit will be needed to retrofit the existing domestic well or completely pursue a new deep well, the Stanislaus County Department of Environmental Resources will be the permitting agency, and upon detachment will be the Groundwater Sustainability Agency overseeing Sustainable Groundwater Management Activities (SGMA) and responsibilities of the Landowner for the parcel(s). Note: Currently the parcel is covered for SGMA compliance through the DM-II GSA, which is affiliated with Del Puerto Water District.

Comment 3. Of additional impact and serious concern is the fact that the land within the Project area currently supports 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 there will be future opportunities to provide further comment, particularly on the scope and content of the environmental information to be included in any future DEIR or formal County processes. As such, the District respectfully requests to be kept informed as to any actions proposed or taken by the County with regard to lands within its jurisdiction. We look forward to hearing from you in the near-term to discuss your project.

Very truly yours,



Anthea G. Hansen, General Manager

Cc: Board of Directors

Alan Doud, Esq.

Emily DeAnda, Stanislaus County Planning & Community Development

Christy McKinnon, Stanislaus County Department of Environmental Resources

Daniel Barnes, RMK Design, Inc.

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