

TERRA LAND GROUP, LLC

February 26, 2018

VIA EMAIL

San Joaquin Area Flood Control Agency
Attn: Mr. Juan Neira
22 East Weber Avenue, Suite 301
Stockton, CA 95202-2317
(Juan.Neira@stocktongov.com)

Re: January 2018 San Joaquin River Basin Lower San Joaquin River, CA FINAL Integrated Interim Feasibility Report/Environmental Impact Statement/Environmental Impact Report: Public Review and Comment.

Dear Project Team,

My name is Martin Harris and I am an authorized representative for Terra Land Group, LLC ("TLG"). TLG owns several properties located in the Lower San Joaquin River Basin that may benefit or be adversely affected as a result of various local, state, or federal government flood protection improvement actions currently being considered for future implementation.

At this time, TLG is in receipt of the January 2018 San Joaquin River Basin Lower San Joaquin River, CA FINAL Integrated Interim Feasibility Report/Environmental Impact Statement/Environmental Impact Report ("LSJRFS"). TLG presents the following responses to the LSJRFS with the hope that the public concerns detailed in this letter will be carefully considered by US Army Corps of Engineers ("USACE") staff members and all other authorities involved for the purposes of mitigating any and all flood water drainage and other impacts created to less than significant levels. TLG believes the LSJRFS project, and particularly with Reclamation District No. 17's ("RD 17") (b) alternatives inclusion, may create significant impacts to existing flood water drainage pathways affecting businesses and residents located in the urban and rural areas of Manteca and/or Lathrop. Therefore, our letter will focus mainly on this subject.

As recent flooding in Houston, Texas has demonstrated, unrestrained development without consideration for flood impacts can have serious consequences. In particular, as more and more development projects continue to move forward, TLG has put forth a regular effort to ensure that local authorities are aware of the need for cumulative environmental review and analysis of all hydrology-related impacts associated with all past, present, and reasonably foreseeable development projects affecting drainage in and along the Lower San Joaquin River Basin and especially the areas affecting the urban and rural areas of Manteca and Lathrop.

For some time now, TLG has sent various letters to the City of Manteca and other agencies expressing public concern related to development in the floodplain and the need to examine any potential impacts

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related to San Joaquin River (and tributary) flows and related upstream and downstream channel flow stage increases due to drainage patterns affected by grade, levee location, and other environmental considerations. (See Enclosure 1 for a list of letters and related items sent from TLG to various agencies that TLG believes are important to consider in the Environmental Impact Study and Review process. Also See Enclosure 2: List of Environmental Impact Reports and Feasibility Studies Reviewed by TLG in preparation for writing this letter.) Through careful study, the letters included in Enclosure 1 can offer significant details relating to what appears to be very significant drainage impacts affecting the Lower San Joaquin River Drainage system and in particular the study area as described to include the areas detailed below:

1. Page ES-1 of the LSJRF states: *The study area also includes the distributary channels of the San Joaquin River in the southernmost reaches of the Delta; Paradise Cut and Old River as far north as Tracy Boulevard, and Middle River as far north as Victoria Canal.*
2. Page 3-31 of the LSJRF states: *Currently, the levee safety program has defined the levee system that incorporates RD 17 as bounded on the north by Walker Slough, west by the San Joaquin River and south by the Stanislaus River. This includes RD 17, RD 2096, RD 2094, RD 2075 and RD 2064.*
3. Page 5-17 of the LSJRF states: **Stanislaus River to Paradise Cut.** *The confluence of the San Joaquin and Stanislaus Rivers defines the upstream extent of the hydraulic model used for this study.*
4. Page ES-2 of the LSJRF states:
Analysis of the study area is challenged by the presence of three sources of flooding, the Delta Front, Calaveras River and San Joaquin River. This results in commingled floodplains for the North and Central Stockton areas. The distributary nature of the Delta also affects Delta water levels, because high flows from the Sacramento River may "fill" the Delta prior to a peak inflow on the San Joaquin River as occurred in 1997, raising water levels on the Delta front levees.
5. Page 5-27 of the LSJRF states: **2.1.1 FLOODING Problem: There is significant risk to public health, safety and property in the study area associated with flooding.** *The study area is located in the Central Valley of California which has very little topographic relief, resulting in potential flooding of areas far from water courses...*

I. Upstream and Downstream Flood and Other Hydrology-Related Drainage Impacts Affecting the Study Area

Accordingly, TLG believes that total drainage impacts to the study area appear to be significant and a cause for public concern when you consider the following items as outlined below.

1. Representations made by Dante Nomelini of RD 17 to the San Joaquin County Board of Supervisors ("SJCBS") on November 7, 2017 indicate that "The flow in the San Joaquin River is difficult to measure because the gauging station at Vernalis, which is upstream from RD 17, it gets flooded out. In '97 it was inoperable. The estimate was, there was about 110,000 cubic feet per second [unconfirmed] at that

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point, which is 100-year event. The 200-year event is expected to be much higher than that.” (See **Enclosure 3**: 04/20/2017 Letter to SJCBS; also See **Enclosure 4**: 11/07/2017 SJCBS Meeting Transcript)

2. Dennis Wyatt at the Manteca Bulletin wrote this quote in his March 22, 2016 article titled “Paradise Cut Work Nears:” “Engineers determined expanding the Paradise Cut would reduce flood stages significantly at Mossdale Crossing — 1.8 feet under a 50-year event as well as under a 100-year event such as the 1997 flood that inundated 70 square miles between Manteca and Tracy.” (See **Enclosure 5**: 03/22/2016 Manteca Bulletin News Article “Paradise Cut work nears”; also See **Enclosure 6**: Map of Paradise Cut with Questions)
3. **QUESTION**: Doesn’t the formation of a seventy square mile flood water basin pond describe a watershed region without a means to effectively drain?
4. **QUESTION**: If the channel flow capacity of the San Joaquin River at the Vernalis monitoring station is limited to approximately 40,000 cubic feet per second (“cfs”), as measured in the channel at the time of the February 20, 2017 levee breach, what flood impacts may be created if flows totalling 110,000 cfs are experienced as forecasted by Dante Nomellini to the San Joaquin County Board of Supervisors “SJCBS” on November 7, 2017? (See **Enclosure 4**: 11/07/2017 SJCBS Meeting Transcript)
5. **QUESTION**: If channel flow capacity is limited to 37,000 cfs at Mossdale and 15,000 cfs at Paradise Cut (totalling 52,000 cfs), where will San Joaquin River flows of 110,000 cfs (as forecasted by Dante Nomellini to the SJCBS on November 7, 2017) be drained at the time of a future flood event of magnitude and size forewarned by Mr. Nomellini (110,000 cfs)? Is it time to consider a southern bypass? (See **Enclosure 7**: Conceptual Vernalis Bypass Design)
6. The LSJRFS states in Appendix F: “Hydraulics,” Page 88, that: *c. Frequency. The Delta Front raises are unlikely to impact flood frequency. However, improvements to the RD17 tieback levee would impact stages for events more rare than 1% ACE.*
7. **QUESTION**: If adequate flood drainage channel flows are not allowed for on the San Joaquin River, Old River, and Paradise Cut, both upstream and downstream of the Clifton Court Forebay, where will the next 70 square mile flood water basin form and at what depth will flood waters reach?
8. **QUESTION**: Based on past flood history in our area and potential new impacts due to global warming, it appears that both Old River and Paradise Cut flows both upstream and downstream of Clifton Court Forebay may be insufficient in total capacity to handle the drainage flows expected at the time of future flooding. (See **Enclosure 6**: Map of Paradise Cut with Questions)
9. This becomes more concerning when considering Paradise Cut improvements as compared to certain information provided in the LSJRFS which calls attention to an “observed decrease in efficiency as the project size increases is consistent with the hydraulic limitations presented by the downstream stage boundary being within the tidal region of the Delta.” For the original text, see the LSJRFS Page 3-6; also

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see Page 88 of Appendix F: “Hydraulics,” as quoted above in Item # 6. (See **Enclosure 6**: Annotated Map of Paradise Cut and Walthall Slough Maps; also See **Enclosure 8**: 04/22/2014 Letter from Mike Babitzke to Diane Nguyen, specifically pages 2 & 3: “Flooding” section)

10. **QUESTION:** Is that why the U.S. Army Corps of Engineers (“USACE”) determined that the Paradise Cut Bypass alternative would not be carried forward, as it is not cost-effective and brings about concerns regarding downstream impacts of widening the bypass? (See LSJRFS Page 3-6 and Pages 87 to 90 of Appendix F: “Hydraulics”)
11. **QUESTION:** If the bypass is not widened to offset increased flood impacts associated with RD 17 (b) alternatives being considered, what mitigation measures will be created to reduce stage increases for events more rare than 1% ACE to less than significant levels?
12. Most concerning is the conflicting position taken by the state Department of Water Resources in the March 2017 Basin-Wide Feasibility Study San Joaquin Basin Draft (“BWFS”) which describes the State Recommended Plan to expand Paradise Cut in accordance with Option M-Ag. (See BWFS Page 7-6)
13. **QUESTION:** What mitigation or other action measures can our federal, state, and local government authorities take to ensure the safe and effective drainage of flood and other forms of drainage water that, if not accommodated for, could result in the formation of retention basin(s) with the potential to reach or exceed the 70 square miles (44,800 acres) inundated between Manteca and Tracy at the time of the 1997 flood?
14. This is especially concerning when considering channel flow deficiencies affecting the San Joaquin River (and associated tributaries) in and along the Delta Front-Lower San Joaquin River Basin. Most concerning is Paradise Cut’s inability to handle large volumes of water anticipated to be generated at the time of future flooding without causing stage increases downstream. This is important when considering that Page 4-8 of the BWFS indicates that increased Paradise Cut bypass flows may cause stage increases along Old River and Grant Line Canal. (See **Enclosure 6**: Annotated Map of Paradise Cut and Walthall Slough Maps)
15. **QUESTION:** In relation to managing drainage flows throughout the system, how many drainage flow choke points or other channel restrictions or blockages exist along the San Joaquin River and associated downstream tributaries in any areas affecting flood water drainage flows through the Lower San Joaquin River Basin? (See **Enclosure 6**: Annotated Map of Paradise Cut and Walthall Slough Maps)
16. **QUESTION:** If safe and unimpeded drainage flows through the Lower San Joaquin River Basin are not achieved, what potential impacts may be created affecting the entire Lower San Joaquin River Basin system for all San Joaquin River, Old River, Middle River, Turtle Beach, Walthall Slough, and Paradise Cut river and/or tributary locations situated both upstream and downstream of the point that Paradise Cut and the San Joaquin River converge? What stage increases will be created in the rural areas south

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of the new RD17 alternative (b) tie back levee? (See the LSJRFS, Page 88 of Appendix F: “Hydraulics,” as quoted above in Item #6)

17. **QUESTION:** Will stage increases along Old River and Grant Line Canal impede flows and cause flood water to back up and affect San Joaquin River and Old River channel flow elevations as those rivers run in, along, and through the City of Lathrop?
18. **QUESTION:** What impacts could be created for either 100-year or 200-year flood events?
19. **QUESTION:** Will flood risk management improvement actions lead to the need to install control structures in and along Paradise Cut to limit Paradise Cut channel flows in a manner that limits stage increases downstream?
20. **QUESTION:** If control structures are installed along Paradise Cut that result in blocking and/or impeding Paradise Cut channel flows in a way that causes flood water to back up and pond, isn't it likely that the area between the Lathrop to Tracy Union Pacific Railroad track systems may be affected? (See **Enclosure 9:** May 2017 SJRRC DEIR ACEforward Map: Figure ES-5 Tracy to Lathrop Segment. This map depicts rail service crossover tracks both east and west of Paradise Cut that may effectively create a flood water retention basin affecting drainage in the area.)
21. **QUESTION:** Wouldn't the ponding of flood water as described in Question #20 result in similar flood risk management improvement actions involving the utilization of gate structures to control flows as those utilized affecting Old Mormon Slough as described on Page 7-7 of the BWFS and Page 4-21 of the LSJRFS?
22. **QUESTION:** If gate structures in the Paradise Cut channel and diversion structures along the left bank of Paradise Cut are utilized to limit flood water flows to mitigate stage increases along Old River and Grant Line Canal, what impacts could be created upstream?
23. **QUESTION:** What increased flood water elevations could be created in RD 2064, RD 2075, RD 2094, or RD 2096?
24. **QUESTION:** Wouldn't it make sense for our local governing authorities to promote a full and comprehensive flood impact environmental review (as previously requested by the public) to properly identify and evaluate the size and locations of any and all public utilities infrastructure involved prior to receiving public comments to utilize in mitigating impacts to hydrology in the area? (See **Enclosure 10:** Three Petitions, Specifically Petition #2: August, 2017)
25. In this way, before any consideration is given to any development project with the potential to affect flood and storm drainage flows affecting the Lower San Joaquin River Basin, all channel flow capacity deficiency impacts affecting drainage may be considered in association with all known and yet to be determined spillways, bypasses, or other drainage waterways currently existing or needed. This is especially true when considering certain impact points at Vernalis, Turtle Beach, Middle River,

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Mossdale, and Old River. The following are descriptions of how drainage flow impacts may affect San Joaquin River (and associated tributary) channel elevations and the ability to flow:

- a. The San Joaquin River at Vernalis as affected by impacts to the region in association with those presented in prior letters related to potential flood impacts. These prior letters draw attention to the potential for drainage impacts involved and support TLG's claim that channel flow capacity at Vernalis has been reduced from its original capacity significantly. (See **Enclosure 3**: 04/20/2017 Letter to SJCBS)
- b. The San Joaquin River north of Mossdale as affected by what appears to be localized residential housing within the City of Lathrop which is currently existing along the river channel. This housing may limit future flood protection improvement options (such as river channel widening) that may be deemed necessary in accordance with the CVFPP. (See **Enclosure 11**: South Lathrop Specific Plan Aerial Figure 2-4)
- c. Old River as affected by anticipated impacts relating to reverse channel flows that may impede the natural flow of the river (and possibly affect salinity levels reaching the South Delta) as identified in pages 3A-28 and 3A-29 of the Bay Delta Conservation Plan California WaterFix Final EIR/EIS (December 2016). (See **Enclosure 6**: Annotated Map of Paradise Cut and Walthall Slough Maps)
- d. Old River as affected by negative natural channel flow impacts that may impede natural flow along the Old River channel and may cause an approximate 0.5 foot stage increase along Old River and Grant Line Canal due to increased Paradise Cut bypass flows as indicated on page 4-8 of the March 2017 Draft Basin-Wide Feasibility Study: San Joaquin River Basin ("BWFS-SJR"). (See **Enclosure 6**: Annotated Map of Paradise Cut and Walthall Slough Maps)

In preparation for the next series of questions, TLG calls your attention to what appears to be significant discrepancies discovered in the Walthall Slough drainage channel flow patterns when comparing satellite imagery to computer generated images as shown in five Walthall Slough detail maps included and attached in **Enclosure 6**: Annotated Map of Paradise Cut and Walthall Slough Maps.

The apparent discrepancies in Walthall flow patterns become more concerning when you realize that the Central Valley Flood Protection Plan 2017 Update Draft Technical Memorandum - CVFPP Investment Strategy, August 2017 ("CVFPP August 2017") includes Item 214 in Table B-5: San Joaquin Basin Management Actions Included within the 2017 Refined SSIA Portfolio, which defines a project described as follows:

Reclamation District 2094 Improve Dryland Levees

The dryland levee located on the south boundary of RD 2094 is lower and less reliable than the levees along the San Joaquin River and was overtopped in 1997 when RD 2075 flooded. This levee was originally constructed to protect RD 2075 in the event of a failure of a levee downstream (north) on the San Joaquin

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River. Furthermore, this cross levee is one of only two means of egress during a flood event. This project would improve this levee to protect RD 2094 from flooding in RD 2075, and would improve public safety.

26. **QUESTION:** Will RD 2094 (south) and/or RD 2075 (north) boundary line levee improvements be performed in a manner that will cut off and divert historic Walthall Slough drainage patterns in a manner that will prevent Walthall Slough from draining across the RD 2075/RD 2094 boundary and into RD 2094 before continuing on to Weatherbee Lake?
27. **QUESTION:** With that in mind, TLG would like you to consider that it is commonly believed by farmers in RD 2075 that Walthall Slough in its current form originates along the southern boundary of RD 2075 (at or near the RD 2064 and RD 2075 boundary line) before continuing north through RD 2075 and RD 2094 before discharging into Weatherbee Lake (RD 2096). Therefore, if current Walthall Slough drainage flow patterns are altered in any way that blocks or diverts historic drainage flows and causes Walthall Slough to lose its ability to send drainage water north of the RD 2075/RD 2094 common boundary line before draining into Weatherbee Lake, what flood and other hydrology-related impacts (storm water, irrigation water, etc) may be created? (**See Enclosure 12:** 01/27/2018 Letter to RD 2075; also **See Enclosure 6:** Annotated Map of Paradise Cut and Walthall Slough Maps)
28. **QUESTION:** Will apparent changes to Walthall Slough flow patterns result in a new basin (similar to Weatherbee Lake) forming in the northwest corner of RD 2075?
29. **QUESTION:** Will apparent changes to Walthall Slough flow patterns affect total elevation drop over what appears to be a shortened length of the Walthall Slough flow channel in a way that may lower the total applied head pressure at the base of the slough as constrained by a possible expanded levee separating RD 2094 from RD 2075?
30. **QUESTION:** Will any decrease in elevation drop head pressure at the base of a divided and shortened Walthall Slough diminish the effectiveness and ability of Walthall Slough to drain into the San Joaquin River during periods of normal use and flood events?
31. **QUESTION:** If Walthall Slough is divided and shortened, will transfer pumps be required to convey Walthall Slough drainage water from RD 2075 into the San Joaquin River?
32. **QUESTION:** If divided, what increases in sedimentation or seepage are likely to occur?
33. **QUESTION:** If divided, how effectively will RD 2075 and/or RD 2064 be able to drain?
34. **QUESTION:** Will urban storm water be drained along any remaining portion of the current drainage waterway currently dependent on and recognized as Walthall Slough? If so, what impacts will be created?
35. **QUESTION:** What potential drainage impacts to rural South San Joaquin Irrigation District ("SSJID") and McMullin Irrigation and Drainage District canals serving Reclamation Districts 2064,

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2075, 2094, & 2096 currently in use may be created in conjunction with planned non-federal sponsor-supported flood protection and management modifications and other forms of infrastructure being considered? (See Enclosure 12: 01/27/2018 Letter to RD2075; See Enclosure 13: 12/12/2017 Letter to MCC; also See Enclosure 14: 01/22/2018 Letter to MPC)

36. **QUESTION:** Doesn't the public have a right to know any and all alterations to federal, state, and/or local district flood protection levees and irrigation and drainage canals being considered to fully understand the potential for any and all impacts that may affect them? (See Enclosure 12: 01/27/2018 Letter to RD2075)
37. **QUESTION:** With all the conflicting information as to where and how City of Manteca storm water collection, retention, drainage, and treated/untreated waste water spray field discharges will be handled, how can anyone fully understand the potential for any and all flood occurrence impacts involved? (See Enclosure 12: 01/27/2018 Letter to RD2075; See Enclosure 13: 12/12/2017 Letter to MCC; See Enclosure 14: 01/22/2018 Letter to MPC; See Enclosure 15: 02/05/2018 Letter to MCC; See Enclosure 16: 02/06/2018 Letter to MCC; also See Enclosure 17: 02/07/2018 Letter to SJC LAFCo)
38. **QUESTION:** In the interest of public safety, wouldn't it make sense to reconsider the Large-Scale Cross Valley Canal that would reduce stages along the San Joaquin River (downstream of the Merced River) by conveying flood flows from the San Joaquin River and its tributaries to the San Luis Reservoir afterbay (ie. O'Neal Forebay)? (See BWFS, Page 4-23; also see the 2017 Central Valley Flood Protection Plan Update, Page 2-7)

II. Floodplain Management and Hydrology-Related Impacts Associated With the Increased Potential for Public Utilities Infrastructure Expansion

In the LSJRFS, Page 3-28: 3.6.1 EO 11988 Analysis states:

ER 1165-2-26 provides the general guidance and policy for USACE's implementation of EO 11988 for all civil works projects. Paragraph 7 of the regulations states: "...It is the policy of the Corps of Engineers to formulate projects which, to the extent possible, avoid or minimize adverse impacts associated with use of the base floodplain and avoid inducing development in the base floodplain unless there is no practicable alternative.

Page 4-28: RD 17 Area (Alternative 7b only) of the LSJRFS states:

Levee Improvements

The RD 17 area includes levee improvements to the French Camp Slough south levee and the San Joaquin River east levee. The measures proposed to improve the levees in the RD 17 area, described in detail in Section 4.3, include cutoff walls, levee height fixes, seepage berms, new levees, erosion protection and slope reshaping. The locations of each fix are shown on Figure 3-9 and summarized in Table 4-4.

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New Levees on Oxbow Cutoff and Tie-Back

The work in RD 17 would include construction of two new levees; the oxbow cutoff levee and the southern tie-back levee. The oxbow cutoff levee is proposed for the San Joaquin River east levee at Old River, negating the need to improve a much longer reach of existing levee around the perimeter of the oxbow; however, the existing levee would remain in place. [...]

The southern tie-back levee would be constructed to extend the existing tie-back levee on the south end of RD 17 to prevent 200-year floodwaters from outflanking the existing levees. The extension would combine with repairs or improvements to the existing tie-in levee to meet current standards. The new levee would be designed consistent as described in Section 4.3 and is shown on Figure 3-9.

(See Enclosure 18: Drake Haglan Recommended Alternative 2A Study Map for RD 17 Tie Back Levee)

QUESTION: What increased flood and reverse flow impacts will be created for South Manteca rural residents, businesses, and property owners affected by RD 17 (b) alternative levee expansion bordering against their property?

The LSJRFS states on Page 2-10, Section 2.3.1 “Existing Non-Structural Features:”

There are several small flood risk management features that were constructed by private landowners or local or regional governments to reduce the consequences of flooding in the study area. These features include small berms, diversion structures and drainage canals. It is assumed that all of these features will remain in place under the FWOP condition.

In addition, the LSJRFS states in Appendix F: “Hydraulics,” Page 88, that: *c. Frequency. The Delta Front raises are unlikely to impact flood frequency. However, improvements to the RD17 tieback levee would impact stages for events more rare than 1% ACE.*

COMMENT: Due to significant California Senate Bill No. 5 (“SB5”) 200-year compliance improvements to the existing RD 17 levee system as proposed in the RD 17 (b) alternatives included in the LSJRFS, TLG believes that it is unlikely privately constructed small flood risk management features will prove adequate to address the increase in flood impact elevations created for flood events more rare than a 1% ACE.

Page 5-237, Section 5.16: Utilities and Public Services, Existing Conditions of the LSJRFS states:

Stormwater in Manteca is handled by the city and by the South San Joaquin Irrigation District (City of Manteca, 2003). Drainage flows west into French Camp Canal, which flows into French Camp Slough and ultimately drains into the Delta. Manteca has a target level of service of 10-year storm drainage protection for all development and a 100-year storm drainage protection for all structures (City of Manteca, 2003).

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COMMENT: Shouldn't proposed City of Manteca Zone 39 (River Drain) storm water facilities also be included in any past, present, and foreseeable cumulative impact analysis? (See Enclosure 12: 01/27/2018 Letter to RD2075; See Enclosure 13: 12/12/2017 Letter to MCC; See Enclosure 14: 01/22/2018 Letter to MPC; See Enclosure 16: 02/06/2018 Letter to MCC; also See Enclosure 17: 02/07/2018 Letter to SJC LAFCo)

Page 5-239 of the LSJRFS states:

Basis of Significances

A project alternative would have a significant impact related to utilities and public services if it would:

- *Result in substantial adverse physical impacts associated with the need for of new or physically altered public service or facilities, including police service, fire protection, school, library, drinking water, wastewater and stormwater collection facilities; [See Enclosure 12: 01/27/2018 Letter to RD2075; See Enclosure 13: 12/12/2017 Letter to MCC; See Enclosure 14: 01/22/2018 Letter to MPC; See Enclosure 15: 02/05/2018 Letter to MCC; See Enclosure 16: 02/06/2018 Letter to MCC; also See Enclosure 17: 02/07/2018 Letter to SJC LAFCo]*
- *Substantially increase need for new or physically altered public service or facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objective; [...]* [See Enclosure 12: 01/27/2018 Letter to RD2075; See Enclosure 13: 12/12/2017 Letter to MCC; See Enclosure 14: 01/22/2018 Letter to MPC; See Enclosure 15: 02/05/2018 Letter to MCC; See Enclosure 16: 02/06/2018 Letter to MCC; also See Enclosure 17: 02/07/2018 Letter to SJC LAFCo]
- *Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; [See Enclosure 12: 01/27/2018 Letter to RD2075; See Enclosure 13: 12/12/2017 Letter to MCC; See Enclosure 14: 01/22/2018 Letter to MPC; See Enclosure 16: 02/06/2018 Letter to MCC; also See Enclosure 17: 02/07/2018 Letter to SJC LAFCo]*
- *Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; [...]* [See Enclosure 12: 01/27/2018 Letter to RD2075; See Enclosure 13: 12/12/2017 Letter to MCC; See Enclosure 14: 01/22/2018 Letter to MPC; See Enclosure 15: 02/05/2018 Letter to MCC; See Enclosure 16: 02/06/2018 Letter to MCC; also See Enclosure 17: 02/07/2018 Letter to SJC LAFCo]

Effects and Mitigation Measures

The project would not involve any changes in land use that would increase short term or long term demand for public services, including fire and police protection, schools, parks and other public facilities, thus necessitating the construction of new or altered government service facilities. Similarly, the project would not result in demand for increased natural gas facilities, electrical transmission lines, communication

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systems, water infrastructure, sewer lines or solid waste facilities beyond their current capacity. These issues do not apply to this analysis and are not addressed further.

COMMENT: Shouldn't proposed City of Manteca Zone 39 (River Drain) storm water and Zone 25 waste water facilities also be included in any past, present, and foreseeable cumulative impact analysis? (See **Enclosure 12:** 01/27/2018 Letter to RD2075; **See Enclosure 13:** 12/12/2017 Letter to MCC; **See Enclosure 14:** 01/22/2018 Letter to MPC; **See Enclosure 15:** 02/05/2018 Letter to MCC; **See Enclosure 16:** 02/06/2018 Letter to MCC; also **See Enclosure 17:** 02/07/2018 Letter to SJC LAFCo; also **See Enclosure 19:** 10/11/2017 Letter from TLG to DSA)

Page 5-239 of the LSJRFS states:

5.16.3 ALTERNATIVE 1 - NO ACTION

[...] Flooding that occurs under the No Action Alternative would result in backflow of stormwater facilities, including a 72-inch storm line which drains into Old Mormon Slough and storm drains for the subdivisions located south of Highway 120 in RD 17.

COMMENT: This "No Action Alternative" should consider the City of Manteca's intent and/or need to improve and/or expand current storm water collection, retention, and drainage infrastructure in conjunction with flood and other hydrology-related drainage impacts involved. (See **Enclosure 13:** 12/12/2017 Letter to MCC; **See Enclosure 14:** 01/22/2018 Letter to MPC; **See Enclosure 16:** 02/06/2018 Letter to MCC; also **See Enclosure 20:** 09/18/2017 Letter to MCC)

QUESTION: Wouldn't storm water drainage for City of Manteca subdivisions located south of Highway 120 in RD 17 continue to be impacted when considered as part of the 7a Alternative impact analysis? See excerpt as included on Page 7-7 of the March 2017 BWFS State Recommended Plan, which states:

Mormon Channel Bypass: *This element includes a control structure and channel improvements to divert up to 1,200 cfs from the upstream end of the Stockton Diverting Canal to the Mormon Channel to add resiliency against projected climate change by reducing flows in the Stockton Diverting Canal and Old Calaveras River. This element is included in the State Recommended Plan because it provides stage reduction benefits along the urbanized reaches of the Calaveras River and Stockton Diverting Canal and provides significant recreational benefits at modest cost.*

III. Cumulative Effects of (a) and (b) Alternatives to Consider as Part of NEPA and CEPA Analysis

In the LSJRFS, Page 4.2, Section 4.2: Alternatives Considered in Detail states:

The Feasibility Study screened the alternative plans down to the final array of alternatives (with options). The difference between the two options for the action alternatives is that option "a" excludes levee work in RD 17, while option "b" includes it. As noted in Chapter 3, the "b" plans were eliminated from consideration

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due to non-compliance with EO 11988. For the purposes of NEPA and CEQA, those alternatives were retained and are included in this analysis.

Further, in the LSJRFS, Page 5-286, Section 5.23: Cumulative Effects states:

*NEPA and CEQA require the consideration of cumulative effects of the proposed action combined with those of other projects. NEPA defines a cumulative effect as an environmental affect that results from the incremental effect of an action when combined with other past, present and reasonably foreseeable future actions, regardless of what agency (Federal or non-Federal) or person undertakes such other actions (40 CFR 1508.7). The CEQA Guidelines require an assessment of the cumulative impacts of a project when the project's incremental effect is "cumulatively considerable." CEQA requires cumulative impacts of a project be assessed with respect to past, current and probable future projects within the region. ... This cumulative analysis uses the list approach. Section 5.23.3 includes a description of the past, present and future projects. (See **Enclosure 21** for Table 5-46: Development Projects within RD 17)*

This is important because for some time now, many south Manteca rural residents, farmers, and business owners have joined together to compel the City of Manteca, as lead agency for flood protection in the area, to conduct a full and comprehensive environmental review in conjunction with proposed SB5 flood improvements affecting the area. (See **Enclosure 10**: Three Petitions)

TLG believes that this is especially important when considering that for some time now, various projects were allowed to work their way through the entitlement/development process without adequate design specifications being completed to clearly identify the various types of infrastructure supporting many of the projects located south of Highway 120.

In addition, the potential for impacts associated with project approvals becomes more concerning as more and more projects are brought forward to the city for consideration and it is realized that the number of options for placement of the various types of currently unapproved and/or undefined infrastructure supporting future development may have been reduced in relation to the total options remaining available. This is particularly true when considering the placement of levees, roadways, and storm water and waste water collection/retention/treatment/drainage facilities, and more. TLG also believes that certain environmental conditions such as the Manteca vicinity sandy soil and high water table are also important to consider. (See LSJRFS, Page 5-11)

With this in mind, TLG calls your attention to various south Manteca development projects (with references to any public comments submitted) that TLG believes should be considered (in addition to those detailed in **Enclosure 21**: Table 5-46 as included on Pages 5-295 through 5-299 of the LSJRFS) in any flood and other hydrology related cumulative impact analysis being conducted. (For these lists, **See Enclosure 22**: Additional Manteca-Area Projects as taken from the CVFPP; **Enclosure 23**: Projects Under Review by the Manteca Planning Division; and **Enclosure 24**: Additional Manteca-Area Projects to Consider as Paired with TLG Comments)

IV. Other Issues to Consider in Association with Protecting the Public's Rights as Allowed by NEPA and CEQA

These flood and other hydrology-related drainage issues gain additional importance when considering that RD 17 Alternatives 7b, 8b, and 9b were removed from consideration and do not appear to be fully and adequately defined in total extent to properly determine and mitigate the range of impacts involved.

Page 3-42 of the LSJRFS states:

The identification of Alternative 7a as the NED Plan serves to set the level of Federal participation in the project. Alternative 7a may not fully meet the NFS objective of SB 5 compliance, but in order to expedite authorization, the NFS elected not to pursue a Locally Preferred Plan (LPP) at this time.

QUESTION: What non-federal sponsor elected not to pursue a Locally Preferred Plan at this time? Is it in the public's best interest to allow a non-federal sponsor to pursue any flood risk management plan that places emphasis on expediting the process over taking the time to consider and mitigate against the potential for very significant drainage impacts affecting the developing and non-developing urban and rural areas of Manteca and Lathrop?

Further, Page 3-40 of the LSJRFS states:

3.6.2 RESULT OF EO 11988 ANALYSIS

As a result of the analysis required for compliance with EO 11988, RD 17 alternatives 7b, 8b and 9b were removed from further consideration. It is understood that RD 17, with funding assistance from the State, is pursuing a phased strategy of levee improvements to increase the resistance of RD 17's levee system to under and through seepage to address residual flood risk. Upon completion of that work, RD 17 intends to request USACE participation in additional improvements to achieve 0.5 percent ACE FRM in order to meet SB 5 requirements.

QUESTION: Why hasn't RD 17 submitted their additional improvements in order to meet SB5 requirements as part of the LSJRFS?

Finally, TLG believes that it is important to add that Page 7-10 of the LSJRFS states:

The CEQA lead agency for this project is SJAFCA. This FR/EIS/EIR was prepared jointly with the NEPA and CEQA Lead Agencies to meet both requirements. SJAFCA and CVFPB evaluated this project under CEQA guidelines and determined that the mitigation measures incorporated would reduce most impacts to less than significant levels; however, impacts to some resources (vegetation, wildlife, fisheries) would remain significant. Therefore, a Statement of Overriding Considerations would be prepared. [emphasis added]

Upon certifying the document, CEQA lead agencies would adopt a reporting or monitoring program for the changes made to the project or the conditions of project approval to mitigate or avoid significant environmental effects. Full compliance would be achieved when the Final FR/EIS/EIR and Notice of

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Determination (Statement of Overriding Consideration) is sent to the Office of Planning and Research.
[emphasis added]

QUESTION: Since the RD 17 (b) Alternatives appear to present significant impacts to hydrology affecting the study area, shouldn't the flood and other hydrology related impacts be considered (in addition to the vegetation, wildlife, and fisheries indicated above) as part of achieving Full Compliance when the Final FR/EIS/EIR and Notice of Determination (Statement of Overriding Consideration) is sent to the Office of Planning and Research?

Over the past two years, the Manteca City Council and associated staff members have promised a future comprehensive environmental impact review in accordance with proposed SB5 improvements as protected under CEQA guidelines.

QUESTION: Wouldn't it have made better sense and wouldn't it have offered better protections to everyone that may be affected if the RD 17 (b) alternatives were more fully defined and included as part of this LSJRFIS EIS/EIR project analysis?

TLG would like to close by presenting the following excerpts from Robert Kelly's book "Battling the Inland Sea: Floods, Public Policy, and the Sacramento Valley" (University of California Press, 1989). This book recounts the history and events behind California's quest to tame the high volume flows of the Sacramento and Feather Rivers. TLG presents these quotes for your review and consideration with the hope that with whatever direction the USACE decides upon to improve flood management protection along the Lower San Joaquin River Basin, common sense and fair play will apply.

The great experiment was in place. By AB 54 the state of California, acting in its sovereign capacity, had dramatically swung over to a Whig-Republican policy base. Under presumably knowledgeable central direction, the state's resources were to be opened in a coordinated way, in the hope that this would create an encouraging climate for entrepreneurs and stimulate investment. Moved by the conviction that it had the necessary wisdom and capacity, Sacramento took the management of entire valleys into its hands. Now an independent public commission that was not under the governor's authority but stood by itself--the first such body in California's history--had been called into being: a Board of Swamp Land Commissioners, elected by the legislature, would begin responding to the problems of central management of state resources, at least so far as this affected swamplands.

The board set out to do its work in accord with sophisticated scientific principles. It brought an abrupt halt to the practice of allowing the Valley to be chopped into small uncoordinated property drainage projects, each of them within borders aligned only with property ownership. Henceforth, flood control works were to be aligned with, rather than run across, the Valley's natural drainage pattern. Experience had thus far shown not only that individually constructed levee enterprises failed, since farmers by themselves could not build large enough works to be effective, they actually worsened the problem because they cut off normal paths of flow.

By what mechanism would the commission carry out its tasks? With their appetite for governing, in characteristically innovative fashion in this arena the Republicans in creating the swampland commission

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had put to use a fresh device. The commission was empowered to create a new class of legal entity called districts, previously unknown in California governance, through which the actual work of reclamation in particular parts of the Valley would be carried out. (Pages 47-48)

In 1870, two years after Moulton and the Meridian farmers had formed their districts, all eyes were turned downstream from Colusa by a dramatic public announcement that confirmed Will Green's earlier warnings about the planning and forming of a great levee project on the west side. A group of swampland entrepreneurs whose lands lay in Colusa Basin revealed that they had pooled their interests to form Reclamation District 108, a giant organization that is still, more than a century later, in active existence. RD 108's appearance was historically crucial. It did in fact initiate in a major way the building of levees on the Sacramento's banks, and its doing so set the whole process of enclosing that stream rushing swiftly along thereafter in a spiral of hectic construction, each project spurred into being as a riposte to prior ones. That is to say, now, along the Sacramento, as earlier along the Feather, the process of self-protection by pushing the river over on people living on the other side--the basic strategy in local flood control efforts in the Valley for forty years into the future--had begun. (Page 144)

Every property owner must look out for himself in a competitive war of each against all... Thus, the projectors of RD 108 intended to do everything they could to prevent the Sacramento River from overflowing any longer on their side, whatever this might do to anyone else. If the farmers whose lands lay opposite to RD 108, easterly of the river, wished to protect themselves against the increased overflows now certain to come to their side, then it was up to them to set about erecting their own riverbank levees... (Page 145)

Thereafter, at huge expense RD 108 had battled the river and its floods year after year, raising levees again and again only to have them overtopped or broken through, in part because levee-builders on the opposite side of the stream were crowding their embankments to the river's edge and leaving too narrow a channelway for floods to pass through. (Page 236)

In January 1906 the first California delegate ever to attend a national river and harbor congress (held in Washington), warned of the cost and that they could not count on tax funds if the people at large did not benefit.

As the meeting proceeded, it was clear that, as the Sacramento Bee had earlier warned, upriver and downriver people had, as always, sharply differing ideas as to what should be done. P. J. Van Loben Sels stood up to declare in a major address that the choke at the river's mouth, below Rio Vista, had to be the first item of business. Then, however, Will Green of the Colusa Sun rose to warn in similarly urgent tones that the upper river had to be got to in a hurry, for its bed was filling in, the water was spreading, and soon there would be no river channel left at all. ...

The gathering thereupon created a standing organization that they named the River Improvement and Drainage Association of California. It turned over its actual deliberations to a "Committee of 24"...

In June, the Committee of 24 embarked on a three-day tugboat tour of the Sacramento River... (Page 258)

They found a deplorable situation. For many miles below Colusa, in the region where the giant RD 108, now decades old, and Meridian's more modest RD 70, equally venerable, had for many years battled the river, there were broken levees and deep cuts on both sides through which water had long been washing. This allowed three-fourths of the river's floodwaters to pass out into Sutter and Yolo basins, inundating them deeply. The water continued to flow through these deep crevasses until the low water stages of the summer season arrived. The Sacramento itself suffered severely from these conditions, for, robbed of a strong flow between its banks, its channel velocity was low and the deposition of silt in its bed was heavy.

At the mouth of the river the committee found the severe choke that Van Loben Sels complained of, a choke that had survived all the state's labors at clearing out Newtown Shoals. In the flood of 1902, because of breaks near the state's Elkhorn weir (upstream from the city of Sacramento and on the river's west bank), so much water had rushed down Yolo Basin and piled up near Rio Vista, where all the discharge of the Sacramento River came together, that it "seemed to accumulate...all at once in enormous volume." The entire basin in front of Rio Vista "seemed one roaring sea, spreading waste and devastation, threatening dikes which had been supposed to be safe beyond peradventure, and overtopping others." So high was the water at Rio Vista that it acted like a dam. The Sacramento River actually stood still far upstream to Walnut Grove. (Page 259)

What must be done? The river's mouth was far too narrow and tortuous as it wound through the delta's meandering channels, a condition worsened by recent levee-building in the delta islands, and it must be opened out drastically with a wide straight cut right across Sherman Island in the delta, creating a single capacious outlet for the river. This recommendation, formerly unthinkable, was the child of new technology, for the necessary immense dredges had been recently invented. (In his 1902 Annual Report, the commissioner of public works also recommended such a cut, which he referred to as being across Horseshoe Bend.) A large deep-channeled new mouth for the Sacramento would lower its fall and induce scouring. (Page 260)

The U.S. Army Corps of Engineers had to reinitiate its learning process once more, only this time it undertook its catechism in a different frame of mind and through different eyes. There was, for one thing, a new person on board. A gifted young engineer, Thomas H. Jackson, who was only eight years out of West Point and already a captain, had arrived in California just a month before the flood of 1907 to become a member of, and apparently the leading spirit in, the California Debris Commission. (Page 278)

As Jackson and the commission got to work on developing a flood control plan for the entire Valley, one thing was clear: whatever they devised, they would have to mold all their thinking to the fact that they had a far larger river to deal with than any of their engineering predecessors had imagined. The information base had changed utterly, everything would have to be reconsidered, and this would take time. There were to be, in any event, no more swiftly constructed plans that nature in the due course would destroy; that would confirm once more Will Green's dictum that engineers did nothing but make mistakes.

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However, if they were going to begin thinking in valleywide terms, a first item of business was inescapably at hand. As for years everyone had been saying, something simply had to be done about the mouth of the Sacramento River. Will Green had long rightly insisted that the river in the mid-Valley region, above and below Colusa, was in deplorable condition, but the commission had to agree with P. J. Van Loben Sels and others like him in the lower Valley that everything depended on the choke in the river's lower sections being removed, and the opening of a wide-enough mouth to allow the Sacramento's immense outflows to pass through unimpeded.

In June 1907, therefore, the first step taken by the CDC (within four months of Captain Jackson's arrival) in its new activist role was to send a request to Congress for \$400,000, to be matched by the state of California, to buy two mammoth dredges. They would undertake a major widening of the mouth of the Sacramento, by means of a large cut across Horseshoe Bend, to accommodate an outflow of 600,000 cubic feet per second. This project, the commission recommended, should be set in motion right away, though it could not be looked on as anything more than a first step, to be taken while the commission itself settled down to a careful, step-by-step development of a comprehensive valleywide flood control plan. (Pages 280-281)

The main stem of the Sacramento Flood Control Project Jackson as conceived of it (and as, with some modifications, it was been constructed) had its northern terminus in the vicinity of Ord Ferry, thirty miles north of Colusa, where the Sacramento in its natural condition began its first overbank flows into the paralleling basins. From that point Jackson planned the project's levees to run downstream for more than 200 river-miles, the southernmost point of the project being at Collinsville at the river's mouth. Sutter Bypass, opening out on the east side near Colusa to receive the huge overbank flows north of that point which pour into Butte Sink, takes the excess water down through Sutter Basin. It terminates at an extraordinary crossing point at the juncture of the Sacramento and the Feather where the flow coming down the Bypass mingles with and crosses through the waters in the Sacramento's main channel to Fremont Weir, on the other side, thence to flow down-valley westerly of the main channel through the ever-widening Yolo Basin bypass. It, in turn, discharges through Cache Slough back into the main river near its (expanded) mouth, and the recombined waters of the Sacramento River thereafter pass on out into Suisun Bay. The expectation was that this combination of works would carry floodwaters down through the Valley and out into the bay much more rapidly than in the past, so that the inland sea, which in the past had been created by backed-up and wide-spreading waters, would no longer appear. And so, indeed, has it worked out. (Page 283)

Thank you for your consideration and for your attention to these important matters.

Yours truly,



Martin Harris
Terra Land Group, LLC

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MH/cm

Enclosures:

Please note: To conserve file size, some of the longer Enclosures below are available for individual download through Dropbox at the provided hyperlinks. Please advise if you require any assistance. All other Enclosures are attached.

1. List of Letters and Items Related to Flood Impacts (with documents provided via Dropbox hyperlinks)
2. List of Environmental Impact Reports and Feasibility Studies Reviewed by TLG
3. 04/20/2017 letter from TLG to San Joaquin County Board of Supervisors
(https://www.dropbox.com/s/wqmo5wf495wjzq/20170703-Enc15_20170420_LTR_TLG-SJCBS_20170425MtgPubComm_MH.pdf?dl=0)
4. 11/07/2017 San Joaquin County Board of Supervisors Meeting Transcript
5. 03/22/2016 Manteca Bulletin News Article "Paradise Cut work nears"
6. Annotated Map of Paradise Cut and Walthall Slough Maps
7. Conceptual Vernalis Bypass Design
8. 04/22/2014 Letter from Mike Babitzke to Diane Nguyen
(<https://www.dropbox.com/sh/pmyrdrirddvs05u/AABhgN5re7iAu3TZ1jWHpGPWa?dl=0>)
9. May 2017 SJRRC DEIR ACEforward Map: Figure ES-5 Tracy to Lathrop Segment
10. 3 Petitions Submitted by Manteca Residents Requesting Environmental Impact Reviews (provided via hyperlinks)
11. South Lathrop Specific Plan Aerial Figure 2-4
12. 01/27/2018 Letter from TLG to RD 2075
(https://www.dropbox.com/s/zxyfrflr3quoag/2018-01-27_LTR_RD2075_PubComm_MHkh_shorter.pdf?dl=0)
13. 12/12/2017 Letter from TLG to Manteca City Council
(https://www.dropbox.com/s/ciaoc2wm9iis5w2/2017-12-12_LTR_MCC_PublicConcerns_MHcm.pdf?dl=0)
14. 01/22/2017 Letter from TLG to Manteca Planning Commission
(https://www.dropbox.com/s/jv9ts3vbg59qc6a/2018-01-22_LTR_MPC_PubComm_wEncls_Reduced.pdf?dl=0)
15. 02/05/2018 Letter from TLG to Manteca City Council Re: Agenda Item C.11
(https://www.dropbox.com/s/u8cndghar5fofv/2018-02-05_LTR_MCC_AgltC11.pdf?dl=0)
16. 02/06/2018 Letter from TLG to Manteca City Council Re: Agenda Items B, D.1, D.2, & E.1
(https://www.dropbox.com/s/33sstfko9fer97/2018-02-06_LTR_MCC_AgltsB%20D1%20D2%20E1.pdf?dl=0)
17. 02/07/2018 Letter from TLG to San Joaquin County LAFCo
(https://www.dropbox.com/s/mz8y84gnnixhewp/2018-02-07_LTR_LAFCo_Aglts4%265.pdf?dl=0)
18. Drake Haglan Recommended Alternative 2A Study Map for RD 17 Tie Back Levee

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19. 10/11/2017 Letter from TLG to the Department of the State Architect
(<https://www.dropbox.com/s/yumyutzz0nl5sni/2017-10-11 LTR DSA FloodConcerns MHcm.pdf?dl=0>)
20. 09/18/2017 Letter from TLG to Manteca City Council
(<https://www.dropbox.com/s/omxkmsjaks74i1k/2017-09-18 LTR MCC AgltC9WastewaterFeasibilityStudy MHcm.pdf?dl=0>)
21. LSJRFs, Pages 5-295 to 5-299, Table 5-46: Development Projects within RD 17
22. Additional Manteca-Area Projects to Consider in Relation to Flood Mitigation: as taken from the Central Valley Flood Protection Plan 2017 Update Draft Technical Memorandum - CVFPP Investment Strategy, August 2017: Table B-5
23. Projects Under Review by the Manteca Planning Division and Housing Inventory Update: taken from the Agenda for the 03/25/2014 Manteca City Council Meeting, Item 7.2
24. Additional Manteca-Area Projects to Consider in Relation to Flood Mitigation: Paired with Previous Comments Submitted by TLG

SELECTED LIST OF LETTERS SENT BY TERRA LAND GROUP
with Permalinks to Dropbox Files

ENCLOSURE 1

Date	Type	From	To	Description	Dropbox Permalink
1	2/7/2018	LTR	TLG	LAFCo	2/8/18 Mtg Ag Its 4 & 5 https://www.dropbox.com/s/mz8y84gnnixhewp/2018-02-07_LTR_LAFCo_AgIts4%265.pdf?dl=0
2	2/6/2018	LTR	TLG	MCC	2/6/18 Mtg Ag Its B, D.1, D.2, E.1 https://www.dropbox.com/s/33ssttko9fer97/2018-02-06_LTR_MCC_AgItsB%20D1%20D2%20E1.pdf?dl=0
3	2/5/2018	LTR	TLG	MCC	2/6/18 Mtg At It C.11 https://www.dropbox.com/s/u8cndghar5fofv/2018-02-05_LTR_MCC_AgltC11.pdf?dl=0
4	1/30/2018	LTR	TLG	SJRRC	ACE Extension NOP EIR https://www.dropbox.com/s/4amu4mlri0o3sf5/2018-01-30_LTR_SJRRC_ACENOP.pdf?dl=0
5	1/27/2018	LTR	TLG	RD2075	1/27/18 Mtg Ag It Public Comments https://www.dropbox.com/s/zxyfrlr3quoagg/2018-01-27_LTR_RD2075_PubComm_MHkh_shorter.pdf?dl=0
6	1/23/2018	LTR	TLG	CVFPB	1/26/18 Mtg Ag It 8A (Letter 2) https://www.dropbox.com/s/jtsvxapgy6bufa/2018-01-23_LTR_CVFPB_Ltr2Agt8A.pdf?dl=0
7	1/23/2018	LTR	TLG	SJCOG	1/25/18 Mtg Ag It 5F https://www.dropbox.com/s/3cjjf3vayqkhi98/2018-01-23_LTR_SJCOG_Agt5F.pdf?dl=0
8	1/22/2018	LTR	TLG	MPC	1/23/18 Mtg Public Comments https://www.dropbox.com/s/jv9ts3vbg59qc6a/2018-01-22_LTR_MPC_PubComm_wEncls_Reduced.pdf?dl=0
9	12/12/2017	LTR	TLG	MCC	Public Concerns Re: Flooding https://www.dropbox.com/s/ciaoc2wm9iis5w2/2017-12-12_LTR_MCC_PublicConcerns_MHcm.pdf?dl=0
10	11/28/2017	LTR	TLG	SJRRC	12/1/17 Mtg Ag Its 2, 5, 6 https://www.dropbox.com/s/ou973vpx5xakxkj/2017-11-28_LTR_SJRRC_AgIts2%265%266_MHcm.pdf?dl=0
11	11/7/2017	TRANSCRIPT			Manteca City Council Meeting https://www.dropbox.com/s/t305bxbkvuvy8rra/2017-11-07_MCC_TRANSCRIPT.pdf?dl=0
12	11/7/2017	TRANSCRIPT			SJC Board of Supervisors Meeting https://www.dropbox.com/s/tcwv3goomanz1la/2017-11-07_SJCBS_TRANSCRIPT.pdf?dl=0
13	10/11/2017	LTR	TLG	DSA (Dept. State Architect)	Flood Concerns https://www.dropbox.com/s/yumyutzz0nl5sni/2017-10-11_LTR_DSA_FloodConcerns_MHcm.pdf?dl=0
14	10/3/2017	TRANSCRIPT			Manteca City Council Meeting https://www.dropbox.com/s/ayvxxzbfva21fu4/Transcript%2010-03-2017%20MCC%20Meeting.pdf?dl=0
15	10/2/2017	LTR	TLG	MCC	10/3/17 Mtg Ag It D.1 - Griffin Park EIR https://www.dropbox.com/s/u2d52mmce8gwd4e/2017-10-02_LTR_MCC_AgtD1GriffinPark_MHcm.pdf?dl=0
16	10/2/2017	LTR	TLG	MCC	10/3/17 Mtg Ag It D.2 - PFIP https://www.dropbox.com/s/n25lih2drhkb90v/2017-10-02_LTR_MCC_AgtD2PFIP_MHcm.pdf?dl=0
17	9/18/2017	LTR	TLG	MCC	9/19/17 Mtg Ag It C.9 - Wastewater Feasibility Study https://www.dropbox.com/s/omxkmsjaks74i1k/2017-09-18_LTR_MCC_AgtC9WastewaterFeasibilityStudy_MHcm.pdf?dl=0
18	9/12/2017	TRANSCRIPT			Manteca Planning Commission Meeting https://www.dropbox.com/s/b1c6wo470vapezm/Transcript%2009-12-2017%20MPC%20Meeting.pdf?dl=0
19	9/12/2017	LTR	TLG	MPC	9/12/17 Mtg Ag It G.1 Griffin Park Project https://www.dropbox.com/s/y3tl3zsj61u64vf/2017-09-12_LTR_MPC_Agt6.1GriffinPark_MHcm.pdf?dl=0

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20	9/6/2017	LTR	TLG	MCDD	Oakwood Landing/Cerri Denali Project DEIR Public Comments	https://www.dropbox.com/s/i7caj91itppw0lh/2017-09-06_LTR_MCDD_CerriDenaliProj_MHcm_STAMPED.pdf?dl=0
21	8/30/2017	LTR	TLG	SJRRC (ACE)	May 2017 ACEforward DEIR Public Comments	https://www.dropbox.com/s/gv9xk0uzdhwle36/2017-08-30_LTR_TLG-ACE_PubComm_MHcm.pdf?dl=0
22	8/9/2017	LTR	MH	SR99/120	SR-99/SR-120 Interchange Improvements Comments	https://www.dropbox.com/s/wovaz73vu9ragism/2017-08-09_LTR_MH_SR99-120InterchangeProj_MHcm.pdf?dl=0
23	7/5/2017	LTR	TLG	SJAFCA	07/06/17 Mtg Ag Its 5.1 and 5.2 Flood Funding	https://www.dropbox.com/s/0fy7d08xlatqedh/2017-07-05_LTR_SJAFCA_AgIts5.1a5.2_MHcm.pdf?dl=0
24	5/31/2017	LTR	TLG	John Maguire	Promoting Public Involvement Re: Flood Protection Along the LSJR	https://www.dropbox.com/sh/zt4ho1yjri4wa4e/AABByDilySd44QCN3udF_M6lWa?dl=0
25	5/16/2017	LTR	TLG	MCC	5/16/17 Mtg Ag It A.11 2017 Fed Legislative Agenda	https://www.dropbox.com/s/rwh26kchjzq3zuj/2017-05-16_LTR_MCC_ReAgItA11_MHjs.pdf?dl=0
26	5/12/2017	LTR	TLG	John Maguire	Response to 4/27/17 email re snowmelt impacts to SJR	https://www.dropbox.com/s/ss2lrlqvxy4ai4k/2017-05-12_LTR_Maguire_MHcm.pdf?dl=0
27	4/25/2017	LTR	TLG	MUSD Board of Trustees	05-09-2017 MUSDmtg/04-27-2017 MBArticle	https://www.dropbox.com/sh/cr7yy1y9m1feaqf/AAC_9lj35X5eLBT64CYHLnJKa?dl=0
28	4/20/2017	LTR	TLG	SJCBS	04/25/17 SJCBS Mtg Public Comment	https://www.dropbox.com/s/7dy40jzleotw56/2017-04-20_LTR_SJCBS_Re04-25-17MtgPubComm_MHcm.pdf?dl=0
29	4/18/2017	LTR	TLG	MCC	04/18/17 MCC Mtg Ag It B.2 Terra Ranch Subdivision Map	https://www.dropbox.com/s/2st0ptaifryrafa/2017-04-18_LTR_MCC_ReAgItB2TerraRMap_MHjs.pdf?dl=0
30	4/4/2017	LTR	TLG	MCC	04/04/17 MCC Mtg Ag It C.1 GP Advisory Committee	https://www.dropbox.com/s/5gur8naawvwbein/2017-04-04_LTR_MCC_ReAgItC1GPAdvisoryCommittee_MHjs.pdf?dl=0
31	3/14/2017	LTR	TLC	SWRCB	Comments on proposed flow increases Stanislaus Tuolumne and Merced Rivers	https://www.dropbox.com/s/wtrmiukoa73y3mm/2017-03-14_LTR_CASWRCB_FlowIncreasesStanTuolMercedRivers_MH_wEnc.pdf?dl=0
32	2/20/2017	LTR	TLG	MCC	02/21/17 MCC Mtg Ag It A.5 Levee Impact Fee	https://www.dropbox.com/sh/goiphxxy938hoqw/AAALAYe4m3MO2sLvMTArCcAYa?dl=0
33	2/6/2017	LTR	TLG	MCC	02/07/17 MCC Mtg Ag It B.3 Levee Impact Fee	https://www.dropbox.com/sh/209rlw89z3xdvzt/AAD-x6vECw8PfApGEiJTvyVqa?dl=0
34	11/21/2016	LTR	TLG	MPC	11/22/16 Ag Its 7.1, 7.2, 7.3 Housing/Safety/Circulation	https://www.dropbox.com/sh/h5nqt2vfuf3iz6g/AADoIH6jCPfv6PPVKILIKcf1a?dl=0
35	12/15/2015	LTR	TLG/Bryce Perkins	MCC	12/15/15 Mtg Ag It B.1 General Plan	https://www.dropbox.com/s/02h2jtwaeKhxga5/2015-12-15_LTR_MCC_ReAgItB1GenPlan_BPjs.pdf?dl=0
36	12/15/2015	LTR	TLG/MH	MCC	12/15/15 Mtg Ag It B.1 General Plan	https://www.dropbox.com/s/7hv0xgzqo7yz2ef/2015-12-15_LTR_MCC_ReAgItB1GenPlan_MHjs.pdf?dl=0
37	11/24/2015	LTR	TLG	MPC	11-24-15 MPC Mtg Ag It 6.3 GP	https://www.dropbox.com/s/z9aoz68xbgs9o6f/2015-11-24_MPC_AgIt6.3GP_MHjs.pdf?dl=0
38	6/23/2015	EML	NU	MPC	06/23/15 Mtg Ag It. 7-1 Municipal Service Review updates	https://www.dropbox.com/s/7c57w02r6fqkrwc/2015-06-23_LTR_NU-MPC_AgIt7-1MSRupdates.pdf?dl=0

SELECTED LIST OF LETTERS SENT BY TERRA LAND GROUP
with Permalinks to Dropbox Files

39	3/31/2015	LTR	John Minney	USACE/ Tanis Toland	Lower San Joaquin River Project Interim Report	https://www.dropbox.com/s/4lhgvtncsoswgte/2015-03-31_LTR_JMinney-USACE_LSJRIInterimReport.pdf?dl=0
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List of Environmental Impact Reports and other Environmental and Technical Documents Reviewed by Terra Land Group

- “SSJID and City of Manteca Request for Proposal for Master Plan Study for the French Camp Outlet Canal;” South San Joaquin Irrigation District, City of Manteca, November 2017.
- “Central Valley Flood Protection Plan 2017 Update [Final];” California Department of Water Resources (“DWR”), August 2017.
- “Draft EIR for the Oakwood Landing-Cerri & Denali Subdivisions;” DeNovo Planning Group, July 2017.
- “Draft Environmental Impact Report San Joaquin Regional Rail Commission ACEforward;” ICF, May 2017.
- “San Joaquin River Basin-Wide Feasibility Study;” DWR, March 2017.
- “Flood System Long-Term Operations, Maintenance, Repair, Rehabilitation, and Replacement Cost Evaluation: Draft Technical Memorandum;” DWR, January 2017.
- “Central Valley Flood Protection Plan 2017 Update Draft;” DWR, December 2016.
- “Bay Delta Conservation Plan/California WaterFix Final EIR/EIS;” DWR, U.S. Bureau of Reclamation, December 2016.
- “CVFPP Supplemental Program Environmental Impact Report;” DWR, December 2016.
- “Recirculated Draft: Substitute Environmental Document in Support of Potential Changes to the Water Quality Control Plan for the San Francisco Bay-Sacramento San Joaquin Delta Estuary; San Joaquin River Flows and Southern Delta Water Quality;” California State Water Resources Control Board, California Environmental Protection Agency, September 2016.
- “2017 CVFPP Update Scoping Report;” DWR, July 2016.
- “San Joaquin River Basin Lower San Joaquin River, CA Draft Integrated Interim Feasibility Report/EIS/EIR;” U.S. Army Corps of Engineers (“USACE”), San Joaquin Area Flood Control Agency (“SJAFCA”), February 2015.
- “Final EIR Phase 3-RD 17 Levee Seepage Repair Project Administrative Draft;” Reclamation District No. 17, March 2015.
- “Lower San Joaquin River and Delta South Regional Flood Management Plan;” SJAFCA, November 2014.
- “Draft: Lower San Joaquin River and Delta South Regional Flood Management Plan;” SJAFCA, January 2014.
- “Environmental Impact Statement: River Islands at Lathrop, Phase 2B;” USACE, October 2014.
- “2012 Central Valley Flood Protection Plan (“CVFPP”);” DWR, June 2012.
- “Regional Mercury Load Reduction Evaluation Central Valley, California;” US Environmental Protection Agency Region 9, CA Regional Water Quality Control Board: Central Valley Region, August 2008.
- “Investing in California's Flood Future: An Outcome-Driven Approach to Flood Management;” Presentation at the Floodplain Management Association Conference, DWR, September 2016.
- “Storms and Flooding in California in December 2005 and January 2006--a Preliminary Assessment;” US Geological Survey, 2006.
- “French Camp Outlet Canal-Hydraulic Capacity Analysis Final Report;” CH2M Hill, February 2002

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TRANSCRIPT
SAN JOAQUIN COUNTY BOARD OF SUPERVISORS
BOARD MEETING
NOVEMBER 7, 2017

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Audio Transcription, Perfected

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Public Works Item: 4

[START 06:01:50]

[background conversation]

Kris Balaji: Very good. Thank you, Chair, members of the board, Kris Balaji, Director of Public Works. The purpose of this item is to provide you with an update regarding the efforts to provide 200-year flood protection for the Reclamation District 17, the RD17 basin. I'll start with a quick refresher regarding the SB5 which was enacted in 2007. It requires the Central Valley cities and counties to make specific flood protection findings for most new development approvals in urban and urbanizing areas. The urban and urbanizing areas as defined in the law are areas having a population of at least 10,000 or projected to have at least 10,000 people within the next 10 years. In making these development approvals, the land use agencies must find that the projects have or condition to have at least 200-year flood protection or that adequate progress as defined in the statutes is being made to achieve this level of the protection. And of course, there are certain exceptions for areas of shallow flooding and small drainage sheds, which I'll show you in a picture in a minute.

Kris Balaji: So in 2016, as you know, the county entered into an MOU, Memorandum of Understanding with the Reclamation District 17, and with the cities of Stockton, Lathrop and Manteca to work cooperatively towards increasing the flood protection for the RD17 area from the current 100-year level of flood protection to the 200-year level as specified in the SB5 and also to reduce the flood risk for approximately 46,000 current residents that are in that area. So the MOU contemplated cooperative efforts to plan, design and implement the flood protection improvements to evaluate and plan the mechanisms to fund the improvements including pursuing state and federal funding and also to evaluate the governance options to actually build and operate those improvements as well. This map shows the RD17 boundary in yellow, which includes the Weston Ranch area within the city of Stockton and the north-easterly portion of Lathrop along with the south-westerly portion of Manteca. The unincorporated area includes the French Camp area and the ag-zoned property to the south.

Kris Balaji: The red and blue areas represent the 200-year flood plain with the red area indicating the 200-year flood depth greater than three feet and those that are less than three feet shown in blue, and of course, the intensity of the darkness of the red color indicates the greater the depth of the flooding, should there be one. This slide talks about the RD17 levees what it protects. So, in summary, there are 46,000 residents as I mentioned before, about 11,000 dwelling units and the major county facilities such as the county hospital, the jail and several major transportation facilities, they all are within this RD17 area that we are striving to improve the flood protection for. Since the MOU was adopted by your board, staff and consultants from the participating entities have made notable progress. And I said to Supervisor Miller that, "You are in trouble because they think that I'm a slave driver. I made these guys wait today for almost six hours and then they left." Not only that, these guys have been meeting with us for almost a year, more than a year, every Thursday, almost every Thursday at 7:00 AM right here at our building actually.

Kris Balaji: So, they have been very diligently and collaboratively working with us to provide this improvement to the flood protection within the basin. As part of that, the first thing that we did was, what will be the economic impact of providing or not providing this type of flood protection? So, an

analysis was done to determine the effect of the RD17's improvements on the overall area's economy. And the analysis of course was complex, and so over 300 pages of financial calculations and we had... Thank God that CAO's office provided the financial analysis support through our CAO analyst Mr. Les Tyler. We went through and looked at in detail what it would do to this county's, the region's economy with or without the project. In simple terms, the analysis showed adverse effects if we did not provide this improvement and it showed a benefit obviously if we provided that increased level of flood protection. Obviously without these improvements certain development permits could not be issued in that area, so that also contributed to general overall increase in the economic output for the region. So we developed a preliminary finance plan which includes three layers basically to fund this project.

Kris Balaji: The assumptions are, you will have a development impact fee and then you'll have an overlay benefit assessment and then on top of that we would have something called the 'enhanced increment financing district', or EIFD in short. So this is the tax, the last part is the EIFD is the tax increment financing. The preliminary plan, the financing plan was basically to demonstrate the financial feasibility of the project. So we wanted to make sure, when I say "we", that by look at our CAO that, we the county, the CAO who is the financial whiz, wanted to make sure that we are entering into a business that is financially viable and it is good for the county's economic well-being and also we are not stretching our neck into an area where we should not be going. So basically, this preliminary plan showed, at first we were hoping that we would not even touch this enhanced increment financing district funding but the analysis showed that in addition to this development impact fees and the overlay assessment, we would need to use that EIFD but not the full tax increment but only about 25% of what the anticipated increment revenue would be generated, so that was a good news actually for us.

Kris Balaji: But still I wanna caution you that, it's only a preliminary financial feasibility, even though it was 300 pages long and it was complex, once we get into the project there will be a much more detailed financial analysis that will be made. And also note that, we haven't really gave up on state or federal funding at this point. As you heard from our advocates from both the state and federal advocates, there are a lot of complexities with respect to going and seeking that funding, and we're still pursuing that but in the meantime, we're using these three to determine the financial viability of the project. So once we determine that the project is financially viable then the next question came in because this project would cover multiple jurisdictions within the county who would be the right agency to actually take the leadership on to deliver the project. So after exploring a number of governance structures and entities, the recommended alternative for the staff was to expand the San Joaquin Area Flood Control Agency, or SJAFCA, to include the cities of Lathrop and Manteca. So we already, SJAFCA contains the city of Stockton and the county. Now we will be adding the two additional cities that covers this RD17 basin. These cities sent a joint letter to the SJAFCA board requesting that they be included in the existing SJAFCA's governance.

Kris Balaji: So in addition to the Public Works team as I mentioned, the county activities undertaken per the MOU involved a number of county departments or officers for their expertise, that included the CAO's office, our CAO analyst was involved in it and of course County Counsel, he got married to this thing from the time the first meeting we had at 7:00 AM in the morning. I don't know if it was the Starbucks or he is so interested in this project, but he had a such a valuable resource to us by participating in almost every meeting at 7:00 AM in the morning on Thursdays. And on top of that we had our Auditor Controller take a look at the consultants' calculations to make sure that the Is are dotted and Ts are crossed. And we also work with the County Assessor's

office to ensure that the correct assumptions are being made with respect to the amount of economic improvement that we would see, should this project be pursued further. And in fact if the project did not go forward, will there be any substantial loss in revenue or economic impact? So we work with the Auditor Controller's office, Assessor's office and the County Counsel and CAO's office to make sure that we vet all that.

Kris Balaji: On top of that we had those meetings that we held every week, the cities of Lathrop, Manteca and Stockton and I call my mentor even though he doesn't take me as his mentee, Dante Nomellini was there also, it's a long drive for him from his office to the sixth floor but he showed up every Thursday for this meeting as well. And of course, our federal advocates, bless their heart, they were there on every meeting via phone call. Mark Limbaugh, Roger Gwinn and Kristi More, they've participated as well, as we went through analyzing various strategies on how we can provide the improved flood protection for the RD17 basin. And one of the thing that we... I mentioned a whole bunch of stuff and of course Supervisor Elliott knows that the VA Hospital is also situated within the RD17 basin. Though it's proceeding on its own without having tied to this RD17 improvement is worth mentioning that that facility's also within the basin. So after all this hard work, September 2017, SJAFCA board directed its staff to negotiate amendments to the current SJAFCA formation document or the Joint Exercise Powers Authority document, we call them JPA, to include the cities of Lathrop and Manteca.

Kris Balaji: So, since then the team has developed and amended and restated joint powers agreement which is anticipated for the SJAFCA board's consideration at its November 16th meeting. Should that JEPA be approved by the SJAFCA board members, the revised JEPA would be considered for ratification by each member agency, it means we would bring it back to you, to this full board to ratify that amendment by the SJAFCA board, so would the cities of Lathrop, Manteca and Stockton take it to their respective counsel for ratification. So if all goes as planned the new SJAFCA board will be expanded and the new members would be seated by January of 2018. Once established, the SJAFCA would assume the lead role for the delivery of the 200-year flood protection improvement for RD17, including the improvement planning, design and construction, implementing and/or recommending, implementation of finding mechanisms that we preliminarily analyzed in the last few months. So that concludes my presentation and I'll be happy to answer any questions. I was going to say that I'll be happy to answer easy questions and have Fritz answer the difficult ones but he left me.

[chuckle]

Chuck Winn: Okay, Supervisor Elliott.

Bob Elliott: Thank you, Mr. Chairman. So the project is improving the flood protection for RD17. Do we know yet what type of actions will be included in that? Will that include dredging and increasing the height of the levees? What will it include?

Kris Balaji: The project in a sense, involves fixing the existing levees. I'm just thinking a little bit carefully when I answer that question because right now there is a state-funded feasibility study underway for that RD17 basin, that is looking into what are all the different options that the state would want us to look at, to provide this improved flood protection. So our preferred option is a fix-in place strategy. Fixing the existing levees and strengthening it and it would involve raising that existing infrastructure as well to provide that 200-year improvement.

Bob Elliott: Okay. So we're not looking at building these additional levees that were going to cut across the ends in certain places that were proposed at one time?

Kris Balaji: Those are also part of our analysis. Actually we're looking into that as well, as part of the analysis. Yes.

Bob Elliott: Okay. But do we think we're gonna be able to go with the preferred option there of just fixing it in place and improving what we've got now?

Kris Balaji: Well, if you ask Mr. Nomellini, you would say the answer is yes, but right now we will hold that until the feasibility studies results come out. But we're hoping that that would be the case actually, that we would be able to do that.

Bob Elliott: Right. Okay.

Kris Balaji: Our assumptions on the financial analysis, taking that into consideration, that's how we're gonna be providing the improvements.

Bob Elliott: Okay wonderful. And then you were talking about the MOU and then this expanded JEPA. Are the members of the MOU different from the members of the JEPA?

Kris Balaji: They are the same, actually. Yes. The MOU was between the cities of Lathrop, Manteca and Stockton and us and the expanded JEPA will also contain the same membership.

Bob Elliott: Same people. Okay, thank you.

Kris Balaji: Sure.

Chuck Winn: Ms. Miller?

Katherine Miller: Thank you. Thank you for the presentation, but I wanna thank you for all the hard work over the last year and a half. I know it was a challenge that we tossed at you to step into this but you've done a really great job. I think along the same lines as what we saw happen with our Ground Basin Authority coming together and building trust and really working toward a common goal. I think this is great, and I'm very pleased to see that you guys are on track. I know you all thought I was crazy when I said I was pretty sure we could have a new SJAFCA board in place by the time the appointments were made in January, but it looks like we're gonna hit it. So I'm really pleased that the negotiations have continued to go well and that all the parties... We've got good strong financial analysis and I'm really pleased and very grateful for all the hard work that's gone into this. Really to everyone that's participated in those Thursday morning meetings, it was a good sized group and I know you've had a whole lot of folks participating. So, really to everyone, thank you for that.

Kris Balaji: And, this, as you mentioned and also as Vice-Chair Villapudua mentioned in his comments earlier, this is going to be a big deal for the region and region's economy. And I know that initial six months of it, coming in at 7 o'clock every day, it was a hard deal for them and I didn't hesitate to say that it was Supervisor Miller's deal. Just threw you under the bus very, very easily.

Katherine Miller: That's fine. [chuckle] I've been there before.

[laughter]

Chuck Winn: Vice Chairman Villapudua.

Miguel Villapudua: Thank you, Chairman. Mr. Balaji, I just wanna congratulate you on doing a hard... The best job you're doing, you're doing a great job. And I've been with you on a Wednesday night, and you'd tell me you have to be at a meeting at 7:00 AM in the office, I can't believe it. Great job. To you and your staff, well done. You're incredible, thank you.

Kris Balaji: Thank you.

Chuck Winn: I know that in January when we were talking about the potential flooding throughout the county, obviously a number of reclamation districts, and they just shared their frustration in regards to being able to clear channels, levees, et cetera, over the years because some of them, the sand bars are almost as high as the top. The question arises, the question was asked, what type of construction or reclamation or cleaning will you do? Because I know it's probably throughout the county, we've had this conversation that a lot of our rivers, channels, levees, et cetera, have filled with a certain amount of silt, debris, whatever trees, on and on and on but, it certainly don't have the flow capacity or the volume that they did when they were first built. Do we have any idea what the percentage of flow that it currently is, in RD17, as opposed to what it was when it was originally constructed?

Kris Balaji: Let me see the RD17 engineer Mr. Chris Neudeck is here. If he could help me answer that. No? We don't have a percentage? Okay, alright. We could look it up and get back to you.

Chuck Winn: Well, it's only the districts, I'm just curious because I know we're talking all over with the county. We've got that project up in Acampo that we're working on with a group of farmers. That's just my question. And then the other part is, what was the experience? Because last winter we had a heck of a lot of water everywhere and I know we had some breaches in the southeast portion of the county. What would they measure that rainfall, flooding, pressure, stress on the levees, were we at 100-year? Or do we have any idea? 'Cause I don't know what a 200-year looks like. I mean I understand three feet, but it seemed like we had a heck of a lot of water at least in my district. It seemed like the southeast county held up pretty well.

Kris Balaji: It is certainly not 100-year storm event actually... Chris do you... Dante, do you want to answer that?

[background conversation]

Dante Nomellini: Flood event I'll call it. It was a lot less than what we experienced in '97.

Chuck Winn: Okay.

Dante Nomellini: The flow in the San Joaquin River is difficult to measure because the gauging station at Vernalis, which is upstream from RD17, it gets flooded out. In '97 it was inoperable. The

estimate was, there was about 110,000 cubic feet per second at that point, which is 100-year event. The 200-year event is expected to be much higher than that. It's unknown exactly what the 200-year is. So there's gonna have to be some further study and agreement with the state as to what the standard ought to be that's applied to determine the 200-year. With climate change they predict a huge increase, up to 330,000 cubic feet per second. Now if you ever can imagine how that water is gonna get there and stay there, it goes all over the whole valley and it's gonna go west. There are a lot of unknowns associated with the flood event. Now there is sedimentation in the San Joaquin River particularly in the Mossdale area. Now how that affects the flow now versus what it was before, I don't know. But the last time RD17 flooded, maybe the only time, but the last time was 1950.

Dante Nomellini: Since that time the levees have been dramatically improved, and we have underway a project to take care of all the seepage repair. We're trying to get that, we've been waiting for years for the permit, the process from the core. We took emergency actions in the last events, spent about \$7 million. We've got another 43 million to spend, which is gonna greatly improve, the levees are already in good shape. This 200 years thing is kinda up in the air. Don't do it, it's gonna stifle your development, the 200-year flood event as analyzed already by Lathrop and Manteca, they spent about \$5 million already doing the study necessary to put the plan in place for a 200-year project and adequate findings have been made.

Dante Nomellini: In a couple of years now, a progress, depending on their events, trying to get the community together as well as expenditures by RD17. Now the 200-year in that study shows that it's boundary, the flood boundary, goes beyond RD17. This is a project that we can't do just as a district. It's really a land use development type of concern for the community. Because if you don't do it you're not gonna be able to develop that area. Additionally it puts at risk, I-5, we're gonna build a veterans administration building, we can, flood, elevate that. But you still might wanna get to it and from it during a flood event.

Dante Nomellini: The reason of having a project that doesn't have the surrounding area protected is hard to support. In fact I think it's crazy. The issue of the levees, the course study, there's a land... This is the wise use of the floodplain issue. There's a very strong policy at the federal level that hadn't been there and it's a state level not to develop behind levees. Because you don't wanna have more people flood. Well the local communities don't wanna develop the deep floodplain that the state has said they're worried about. And instead of accepting the planning restrictions which are not only at the local level, they're at the Delta Stewardship Council level too. They want to see firm purchase of all the development rights in that area which is a phenomenal amount of money to do, it's an impossibility. So you have to figure out how to do a project without that expenditure because they will not fund it. My recommendation is to stay with the existing levee where we've got a tremendous investment, it's a project levee, we got contracts to maintain it and I think they can't abandon it legally. So the talk about doing that is kind of an impossibility.

Dante Nomellini: Now to do the 200-year you have to do some further improvement to the existing levee but you also have to expand the dry land levee off to the east which involves Mr. Harris's area and some of the people over there concern how that would be routed. But as you raise the water levels in the river it wants to go farther to the east and go around the existing levee. So there will be a new dry land levee extension with the fix in place. What we don't wanna do from, RD17 can't do is examine the possibility of dividing the district up and providing 200-year to one part and not to the other. Our mission is to operate maintain existing levee system, so we can't spend our money

putting one part of our district against the other. So we're not in the modification of the SJAFCA board, we're in the MOU, we stand there to cooperate but if the community decides to divide this thing up, RD17 doesn't have a role. Which is fine, I think we can work our way through it, it's the pressure to control development and not trust the planning process that's driving the issue with the state.

Dante Nomellini: The Corps of Engineers, I think, under the Trump administration is gonna streamline regulations and has already pulled back some executive orders that were complicating the situation more. So there's some optimism there. I personally feel it's up to the community, it's a very serious thing if you don't get the 200-year, you're gonna have blighted communities, not only in RD17, but in the rest of our community. That 200-year thing is what they're trying to build off of and the idea is... For example Houston, destroyed by the hurricane, half of it, are you gonna abandon the part that's there, that got damaged or are you gonna repair it? And I don't think there's any money to relocate it. So you're either gonna try and hold what you have, protect the people you have as best you can, or you're gonna end up with a blight.

Dante Nomellini: So I think it's a very good effort, I appreciate the county and the city, I think all you guys have to be in it in order to carry the political [unintelligible] to get the project done. It can't be a local reclamation district, or just one city or two cities. You've gotta be united, work together, look at the financing, don't spend money you can't get, be diligent in not spending out ahead of the revenue. I think you can make good faith progress if you get to 2025 and you've made good progress and you haven't made it past the perfect limit. I think you can probably justify [unintelligible] that. So I support it, I appreciate the good effort all of you have made but I think it's important to your community that you try and get this job done. We'll help. Right, thank you.

Chuck Winn: Alright, I appreciate that. Supervisor Elliott.

Bob Elliott: Yes, question for Mr. Nomellini there. So I may have misunderstood but I thought earlier you said that there was still some negotiation going on or that would have to take place to determine exactly where the 200-year flood plain protection would go. I thought all that had already been mapped out.

[chuckle]

Dante Nomellini: What the state did is they produced maps that you can't rely on. But they have in their Central Valley Flood Protection Plan that you have to project out for climate change, and they're talking about 2064. What's the situation that'll be in 2064? I described it as throwing a dart at the wall, predicting what the weather is gonna be in the future that will exceed what we've experienced in the past. You can't say it won't happen, but where is it? There are definite boundaries that have been described in the studies that have already been performed by consulting engineers under this \$5 million effort. But DWR wants the plan to consider 10 years farther based on climate change.

Dante Nomellini: So it isn't sorted out as to what the prudent level of future climate change should be included in the plan today. Now how that's gonna affect your project is that if you pick a midpoint from 110,000 cubic feet per second at Vernalis to 220, how far to the east is that project going to impact and benefit? It affects the financing and of course the engineering plan. So there are unknowns in that, that will get sorted out, there's a feasibility study being conducted right now

between the state and the city of Lathrop and the city of Manteca that will be absorbed, I guess, by the SJAFCA that is looking at various alternatives.

Dante Nomellini: Now we don't know what the outcome of that study is gonna be. The community, if it doesn't come to agreement with the Department of Water Resources on a preferred plan, you can withdraw from it. That's the way of structure. Of course it would be preferable to reach accord on what the solution would be because then you get state funding. But if they come up with something crazy that you can't accomplish, then you may have to withdraw. The other thing they do to you in these studies is when you wanna go forward with construction, they want you to hold them harmless as to flood damages in the future. Well if they dictate a bad plan and you have to hold them harmless, you wouldn't wanna do that. So it's kind of a... There's some unknowns in this process that will get sorted out. But right now I think you're headed in the right direction and stay with it, be cautious, look at it, I'll help for the time that I'm still around, but I don't think you can abandon the area. This is really important and it's gonna spread through the community. You're gonna get me 200 years doing all kinds of things. Get mortgages and get funds for highways, all that. It's in the wind. Anyway, I don't wanna discourage you but you asked some questions...

[chuckle]

Chuck Winn: Thank you.

Dante Nomellini: Alright.

Chuck Winn: Thank you. Any other questions?

Speaker 7: Chair Winn, I'd like to bring something up on the financing. So today, since a lot of details weren't given to this board for consideration on the financing, Mr. Balaji has committed to me that at a future discussion. But what we have talked about because since a lot of the development does take place within the incorporated cities that it's really important for the county and especially within the financial analysis that's being done in the CAO's office, there might be a situation especially within... Kris, please correct me if I go down the wrong path. With the EIFD where the county is contributing their property tax increment prior to possibly the city's. But yet we are expected and we anticipate that all four parties, the three cities, Stockton, Manteca and Lathrop, along with the county, that there would be a level of equality of the tax increment, which is the property tax increment, that we would be giving up to fund towards this project.

Speaker 7: And I have yet to be told 'cause I've asked the question, does it include our existing base property taxes, because as you all know, counties rely more on property taxes and cities rely upon sales tax. So it was extremely important to me as part of the financial analysis and between Mr. Balaji, I could tell he wants to get something out here, and Mr. Tyler. They've been looking at to make sure that we're not... They're going to confirm for me prior to us bringing it back to the board that does it include our existing base property taxes? Does it impact as a result of what we're collecting now? And so, go ahead.

Kris Balaji: Thank you. The EIFD, the Enhanced Increment Financing District, we're only tapping into any increase to the revenue from what we have right now, directly contributed by this specified development that we are contemplating. So in other words, right now let us say property tax for some property is \$100, and the analysis shows that if we do not do this improvement, we might

have a decrease in that revenue. From \$100, it might go down to \$90 or whatever that number could be. There could be a decrease. On the other hand, if we provide this 200-year level of improvement, it could go above that current level of \$100. Let us assume for this discussion's sake, it goes up by \$2. So, of that \$2 increment, this project from what the financial consultants have told us is, of that \$2 increment, we're only tapping in 25% of that anticipated increment in order to fund this project. So that 25%, what we are accessing is in addition to the development impact fee and also an overlay benefit assessment that we're contemplating to assess for the beneficiaries of who would receive this increased flood protection. So the answer is that we do not contemplate on taking in to the base revenue that we have right now. The EIFD only contemplates on tapping into the incremental revenue that would be arising as a result of providing this 200-year flood improvement.

Katherine Miller: And Mr. Balaji, in regard to the assessments, some of the assessments that are anticipated as part of the financing, those will have to be voted by the property owners also?

Kris Balaji: Correct. The benefit assessment will be subject to an assessment vote much like... I wanna say 5-218 type of an...

Katherine Miller: Right.

Kris Balaji: Yes.

Katherine Miller: Okay.

Chuck Winn: Would that funding stream that you're talking about, would that then go towards the bond to build it or to...

Kris Balaji: Yes, that's correct.

Chuck Winn: Okay. So you're looking for a permanent or stable revenue stream to go out and bond to complete the project.

Kris Balaji: Yes. So then that means we would do an investment grade analysis when we get to that stage to completely... Right now, we did a financial feasibility, actually a lot more than a sketch level deal, but we will do... The SJAFCA would do a further analysis before it goes for the financing option, yes.

Chuck Winn: Okay. Alright, thank you. Supervisor Miller?

Katherine Miller: Yeah. So I wanna make sure I understand this. So then all of the parties would need to buy into the boundaries of the EIFD and would be agreeing to contribute 25% of the tax increment from within their boundaries. So the county would be contributing 25% of increment from the unincorporated areas, City of Lathrop will be contributing 25%. Is that correct? So we would all be in this for the same... We would all be committing the same amount of future tax increment toward the project?

Kris Balaji: That's correct, yes.

Katherine Miller: Okay.

Kris Balaji: Yes.

Speaker 7: That's the goal but that's what I think will be extremely important for this board. They'll understand once Mr. Balaji is ready to bring that entire financial picture before this board. Right.

Kris Balaji: And that... We would take some time for SJAFCOA to develop that type of analysis and bringing it to their board and then it will be brought to our board for ratification. It won't be within the next three, four months that we were talking about. The next time when we bring this item to the board, it'll be just ratification of the membership. That's all.

Katherine Miller: I can't even imagine that any of the other entities could possibly think that only one member would be contributing tax increment to provide benefits that aren't within our jurisdiction.

Speaker 7: And I don't believe they are, Supervisor Miller, but I just wanted, because we weren't showing you a lot of numbers today, I want... That's a big policy decision for this board because we rely primarily for general purpose, our property tax but exactly as Mr. Balaji said and I appreciated him confirming that it is just on the growth. So it is on the growth and so that's a policy decision of this board.

Katherine Miller: Yeah. And so timing does become an issue because the sooner you form the EIFD, the sooner you set your baseline especially in an environment where property values are increasing, you wanna get your baseline set so that you start earning tax increment which can then go toward financing the project.

Kris Balaji: Supervisor Miller, you've brought up a very excellent point. A financial novice like me didn't understand that urgency of it because the real estate... If I could use the word, it's like a stock market. It moves up on speculation and now that we are forming this agency and we're making good faith progress, then when the people know that, "Oh yeah, this is going to have an increased level of flood protection." Obviously, that property value rises so the sooner we go there and establish that baseline, then we can start capturing that increment to our advantage. So you hit it right on the head.

Katherine Miller: And it's my understanding that once you set the baseline, should there be, say, a bubble that as we experienced before where property values plummet, it doesn't cut into the base. The baseline is the floor so we would never lose the property other than values going down, but it isn't that we would lose more because of the increment. It's only 25% of anything above the baseline. So if property values re-adjust downward, then it takes a while for that increment to build back up again.

Speaker 7: And Supervisor Miller, that's what I so appreciate about this board because as the Children's Alliance mentioned originally, they were advocating for a carve-out. That is extremely detrimental when we end up in a recession because... And that means when there's a carve-out, they get it no matter what, and that is not sustainable for this organization, especially seeing our flat numbers when it comes to our assessed valuation of our property tax roll. So I appreciate the discussion on this.

Chuck Winn: Just a clarification. We talked about 25% increment of new tax revenue, correct? Is that what you're talking about over and above what the additional amount would be above the baseline?

Speaker 7: Correct. Correct. It's based upon the value. So if say there was, exactly, I think Mr. Balaji used an example. So say we had a base of \$100 and then there was the value as a result of the enhancements the tax increment, it's very similar to an RDA situation, so it went up say by 15%, we're saying take 25% of that 15% value increase, that would go towards this EIFD. As the revenue flow to pay potentially for future bonds.

Chuck Winn: But how does that correlate with the other three cities, the three partners as far as... I understand percentages, the equality of them, my concern is dollars. Because when you talk about percentages one body may be paying more than another body for the same benefit. I guess my question is, are all four participants or partners paying the same amount a quarter of the necessary funds or revenue to fund this particular bond?

Kris Balaji: It is a very fair assessment of... It is proportional to the benefit that each agency would receive. So it is based on the benefit basically. So if... Let us say, if Lathrop had more homes that they were able to build because of this, they can make this adequate progress finding and as a result of that they were able to build more homes, then they are going to be providing that increment from those properties, if they built more homes then they would be contributing more because they've benefited more because of this improvement. So it will be proportional to the amount of benefit each agency will be receiving. So it will be a fair contribution based on the benefit that they realize.

Chuck Winn: Well normally, the county encourages the cities develop, as opposed to county. So the county wouldn't be developing a lot compared to... Well look at Manteca and their growth, and Lathrop also over the years, I mean they've grown like gangbusters. Okay, it's not my district, I just I keep hearing about RD17 all the time, just trying to understand what the future holds certainly for the county, but yeah. I know Supervisor Miller...

[overlapping conversation]

Kris Balaji: No, Supervisor, you brought up a very good point because if you look at how much developable area that is within the unincorporated portion of the county, it's not much. Most of that development, you are absolutely right, it is going to be happening within the Manteca and the Lathrop areas and their share will be higher, yes. But again it is a fair share because it is how much benefit that they receive. Because if you don't have this project that development won't even happen. They all understand that very clearly as well.

Chuck Winn: Okay. Well, I appreciate that, we talked earlier about which is a big mess in the state affordable housing. It's really driven... The price of our housing in California is driven by the cost of property and the restrictions in the zoning and all the other things, but I understand, so I appreciate that. It's clear to me now. Any other questions? Comments? Okay, if that's, open up the public have a couple of speakers I don't think... Is Steve still here? Salvatore from Lathrop?

Kris Balaji: He waited and then he left actually.

Chuck Winn: Martin Harris.

Martin Harris: Alright, good afternoon. My name is Martin Harris and our family we own a property in the city of Lathrop, we have property in the city of Manteca and we own some farm ground in the rural area, south of Manteca. So depending on what happens with levee and flood protection might help some of our properties, it might hurt others. But I'm here today to not only increase the Harris's interests. I'm looking out for our neighbors that are in the rural areas south of Manteca. A few things were said earlier, the RD17 system was defined in the February 2015, I think they call it the Lower San Joaquin River Feasibility Study, it's a lot longer name than that put up by the Army Corps of Engineers. But they defined the RD17 system to not only include what RD17 has now, but to also go south and include Reclamation District 2096, 2094, 2064 and 2075. And what I believe, feasibility study hasn't been completed because there's really no way to split up that whole area without having pretty drastic impacts to the areas that are left out. I think the biggest problem is Vernalis.

Martin Harris: Vernalis last year at no time based on all the release information that I downloaded and I submitted all that to your agencies so you have that for the full year, never exceeded 41,000 cubic feet per second. I did levee patrol one night and it was just before it crested at the highest amount but that river wouldnt have handled anymore what I believe, probably 36,000 was the capacity. There's a bunch of levee work going on the south side of the river right now east of Vernalis, it's been going on for quite some time and it's right at the point where... Let's see, the Kasson Road and I think it's Greenwood meet, so it's in Stanislaus County but there was huge erosion problems that were... Part of bank sloughed off, they put in all kinds of dirt, but that's only about a mile to the east of Vernalis and I'll bet you anything, all that sand travelled to the west and it all settled in that same area. So I bet you this winter we won't even handle the 40,700 cubic feet that we had last year. I think we have a real problem. Getting back to that area south of Manteca...

Chuck Winn: Go ahead. Don't worry about the red light.

Martin Harris: Thank you. I believe that 2003, there was a court settlement. The Paradise Cut was going to be expanded, but it never happened. Manteca Bulletin's written about it numerous times and can't understand why the Army Corps is holding it up. When we looked at another EIR that was March of this year, I think it was the Lower San Joaquin River Feasibility Study, page 4-8 says that, "Increasing flows from Paradise Cut, although that help the San Joaquin River at Mossdale, they're gonna cause stage increases downstream." And to meet with that, at Old River. And what that means is, in my interpretation, that if they do increase the runoff going down Paradise Cut, that's going to impede the flow of Old River as it leaves the San Joaquin River and heads west to the connection where Paradise Cut and Old River meet, that's gonna cause the water to backup on Old River and that's gonna impede drainage flows coming off the San Joaquin River. That's what I believe.

Martin Harris: So in the end, I think unless we come up with a way somehow to get water out of the San Joaquin River, and drain it to the west, and I don't think Paradise Cut is gonna be adequate, I don't know if Tom Paine Slough would be a potential use, but I don't believe this thing is fixable without forcing that whole area south of Manteca to be a storage basin. I think that's where this is headed, mainly because '97 the river broke. And then, what they call the pocket, it nearly broke last year in the pocket. And I believe that the most likely scenario, because they're doing all kinds of work on the opposite side of the the San Joaquin River around Vernalis. Most likely scenario, it's gonna break on the Manteca side and it's gonna start working towards the current RD17 levee. I don't think the current location of the levee is in a good spot because it's too far to the north of any

possibility to drain to the west, with the exception of, if you break the levee at Turtle Beach on both sides. And I think the opposite side you've got the Brown family's business. So I just see huge impacts for our area and somehow we've got to figure out how to pull this together and figure out how we're gonna move water.

Martin Harris: I am all for protecting 46,000 people. But if you're gonna turn South Manteca into a basin, I think people need to be compensated. February of this year, on February 6th and February 20th I wrote letters to Manteca, told them, "You guys don't have enough money." And part of it was because, yeah you can do a fix in place. Fix in place works good if you're working along the San Joaquin River, but if you're talking a cross levee, the location of it's gotta be calculated out pretty carefully. And I just believe there is not near enough money to look out for all the people that are gonna be affected. And the way that Manteca conducted their whole levee approval was bad, and there's a lot of people mad. They've divided the community. And now after that, Manteca steps aside to hand this off to another agency, you're gonna have a lot of angry people on both sides of the fence in Manteca, unless you can figure out a way to fairly compensate people for the impacts they're gonna have. I make these comments in the spirit of having something come out good for everybody. I definitely don't wanna see anybody get flooded, but I don't wanna see anybody get hurt. Thank you.

Chuck Winn: Thank you. Mr. Balaji, I know that you're working on a project in the Acampo area in regards to storage, above ground storage, etcetera, with the area's property owners. I'm not... Obviously Supervisor Elliott and Patti probably have a better understanding of it. I know you've been able to work with the farmers up there in regards to moving the water south-westerly because of the flooding we had last winter. I don't know Mr. Harris, obviously he knows it like the back of his hand, but maybe with Supervisor Elliott, Supervisor Patti, maybe you can work out something. 'Cause the one comment you made which... I also chair the Sustainable Groundwater Management Act, which is the groundwater storage recharge system that the Governor came out with last year. And that's one of the things we're looking for, is we're looking for storage recharge opportunities, primarily because we can percolate the water from particular areas back in the aquifer although you're in the Tracy Basin, but it doesn't matter where it is, it just helps the entire county. So, maybe if you can just have a conversation and see exactly, again, what his concerns are and maybe we can work out something with Supervisor Elliot and Supervisor Patti.

Kris Balaji: Okay.

Chuck Winn: Okay, so any other... Let's see... What else we got here? Raymond Quaresma?

Raymond Quaresma: Thank you for letting me speak. I'm a third generation dairy farmer in the area. I've had a lot of experiences, myself, riding the school bus in 1969, we couldn't get through out there. The dairy farmers in Reclamation 2075 and my sister district is 2064. '83, it flooded through our levee and we plastic-ed it and it was very dangerous. '86, '97, 2006 and then 2017. It's a dangerous area, I recognize all the potential of urban. Urban usually wins out, because you got the whole value there. But I also respect nature, and nature's gotta have its say. And that is a very dangerous area and that RD17... We and common sense belief and I learned under Alex [Hildebrand] and Mike Gikas and so we just don't understand RD17, is a hard one to figure out, because that is in a very dangerous floodplain. It's not like in a normal floodplain. It's a very dangerous floodplain. Can't figure out why...

Raymond Quaresma: The 46,000 is fine but you're talking about \$650,000 the way these councils are coming at us. 140,000 people, new construction coming south of the bypass and Tracy and RD17 and us, hundreds or so people stopping this billion dollars worth of work. But I ask you, in conscience, you're respectfully respecting nature... I'm in humility, 'cause I heard the veterans here earlier. And... Who fight for this country and respecting the community which you represent. Those people are in danger in RD17. That's a very dangerous area that you have a force of substance up in those mountains, it's gonna come down and it's gonna have its say and it's gonna have to have a place to go. And that RD17, is a very dangerous area. I can't figure out why those developers... I get the idea they can get the ground reasonable and spread out the risk and liability to the community. But why not just stay out of the channel where nature wants to drain? Instead of trying to move earth around? It doesn't make sense. We're not gonna be able to move enough earth. Nature's gonna have its say. So you guys gotta figure out the money side, for your conscience, you have to figure out the community side, and where you fit in that. I thank you for letting me speak. Thank you.

Chuck Winn: Thank you. Anyone else? Just a comment on that. There's a lot of work done in the mountain counties in regards to the watershed which we're all talking about, and also the storage capacity of our reservoirs... We talked at a Water Advisory Commission, also with the SGMA, the Eastern San Joaquin... I would only offer this, that, you can't look at one region in isolation because we all come together, and one of the things that Central Valley Flood Protection Plan, which only talks about levees, et cetera... There's a larger conversation amongst the regions. The Delta regions counties, the mountain counties, and certainly, the San Joaquin Valley counties and certainly this county in regards to trying to find solutions that go beyond our borders. Because it depends on the water coming our way on how we deal with it. So we're trying to work on those things at the same time. Mr. Balaji and his staff have been excellent on that, so I appreciate your comments, I understand your concerns. Obviously your supervisor I'm sure on top of it and we'll see how we can collaborate on that to improve the situation short-term rather than long-term. I see no one else. Close the public comment. This is just report.

Kris Balaji: Thank you, Supervisor.

Chuck Winn: Thank you. Appreciate it, good work. Appreciate what you're doing.

[background conversation]

[END 07:01:12]

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Paradise Cut work nears

Request to enhance flood protection made 13 years ago

Dennis Wyatt
dwyatt@mantecabulletin.com
March 22, 2016

A partial solution to the flood woes between Mossdale Crossing and Vernalis southwest of Manteca on the San Joaquin River has been waiting for federal approval now for 13 years.

Cambay Group filed for a permit in 2003 with the Army Corps of Engineers to modify Paradise Cut. It was supposed to be an 18-month approval process. Now 13 years later the Army Corps is reportedly nearing completion of its review process for the Paradise Cut application that's part of the 10,800-home River Islands at Lathrop planned community.

Many people who live and farm east of the San Joaquin River and south of Manteca were under the impression River Islands were supposed to have done the work years ago. They made that point during a Manteca City Council meeting earlier this month regarding the proposal to spend \$168 million to make levee improvements to meet a state mandate for 200-year flood protection. River Islands wanted to do the work a decade ago but the bureaucratic review process with the state and federal government has stretched out the government's own time table by 11.5 years.

Paradise Cut has historically taken pressure off the San Joaquin River when it nears flood stage. It has little water in it much of the year. It runs beneath Interstate 5 just north of the Interstate 205 interchange along the southern edge of River Islands.

River Islands' proposal is to add 200 acres to the 600 acres that are within Paradise Cut that runs from the main river channel prior to it reaching Mossdale Crossing and runs parallel to the Middle River Channel. They also want to restore habitat.

The River Islands project is based on a proposal made years ago that resurfaced in 2001 in an Army Corps of Engineers report to create a river bypass to reduce the potential for flooding in Manteca, Lathrop, and Stockton.

The Lower San Joaquin River Flood Bypass Proposed was formally submitted to the California Department of Water Resources in March 2011 by the South Delta Levee Protection and Channel Maintenance Authority and other partners. It was an effort to secure \$5 million to create the new flood bypass in the last corridor of undeveloped land between Tracy and Lathrop.

Engineers determined expanding the Paradise Cut would reduce flood stages significantly at Mossdale Crossing — 1.8 feet under a 50-year event as well as

under a 100-year event such as the 1997 flood that inundated 70 square miles between Manteca and Tracy.

At the same time it would offer habitat and migration territories for juvenile steelhead, salmon and spawning split tail that are driving some water use debates.

It would also allow upstream reservoirs to be managed more conservatively to reduce water releases during the rainy season and spring runoff to conserve water for summer use.

David Kennedy, the longest serving director of the Department of Water Resources, in 1998 wrote the following about the Paradise Cut bypass proposal in the forward of the second edition of "Battling the Inland Sea": "Recognizing the futility of simply raising the levees, flood control experts will now evaluate the feasibility of removing levees in some locations and simply letting future flood flows pond onto adjacent lands. Further, consideration is being given to opening up some form of bypass through the south Delta to relieve pressure on the levees as the San Joaquin River flows into the Delta. It is hoped these issues will be resolved and changes will be made before the next flood."

Cambay Group wants to set levees back on the north side of Paradise Cut as well as on the south side. They provided \$700,000 for land acquisition and agreed to spend money to do the necessary work that was pegged at between \$1.8 million and \$3 million five years ago.

River Island project
manager agrees
dredging would help

River Islands Project Manager Suns Dell'Osso agreed with Manteca Mayor Steve DeBrum's contention that dredging the San Joaquin River between Vernalis and Mossdale would significantly enhance flood protection.

Dell'Osso knows a bit about issues on the river given that Cambay Group ended up spending \$70 million to create super levees 300 feet wide to take 900 acres on Stewart Tract where homes are now being built out of the 200-year flood plain. The firm is getting ready to do more levee work that would protect 300 more acres.

In addition River Islands has spent \$2 million on studies to prove to the state that the levees created in 2006 provide 200-years flood protection as mandated by Senate Bill 5.

"We didn't do anything else to the levees," Dell'Osso said. "But because Senate Bill 5 didn't exist in 2006 we had to (prove that they meet the new standards.)" Cambay Group expects to submit data needed for certification that 200-year flood protection exists in May to the Lathrop City Council.

As for dredging the river, Dell'Osso believes there is a good chance it would address all or most of the need for 200-year flood protection.

"But given how long it takes to get approval for (water) projects from the state and federal governments, there's no way you can get approval by the July 1, 2016 deadline," she said.

She added many state water managers as well as environmental groups and

fishing advocates are against dredging as it would create issues with water quality that would initially pose a problem for fish
Dell'Osso pointed to River Islands' experience with Paradise Cut. She noted bureaucrats assured it would be only an 18-month process.

<http://www.mantecabulletin.com/archives/133337/>



Imagery ©2017 Google, Map data ©2017 Google United States 2000 ft

- | | | |
|--|--|--|
| ■ Paradise Cut | ■ Old River | ■ Junction of Paradise Cut and San Joaquin River |
| ■ San Joaquin River through City of Lathrop | ■ Middle River | |

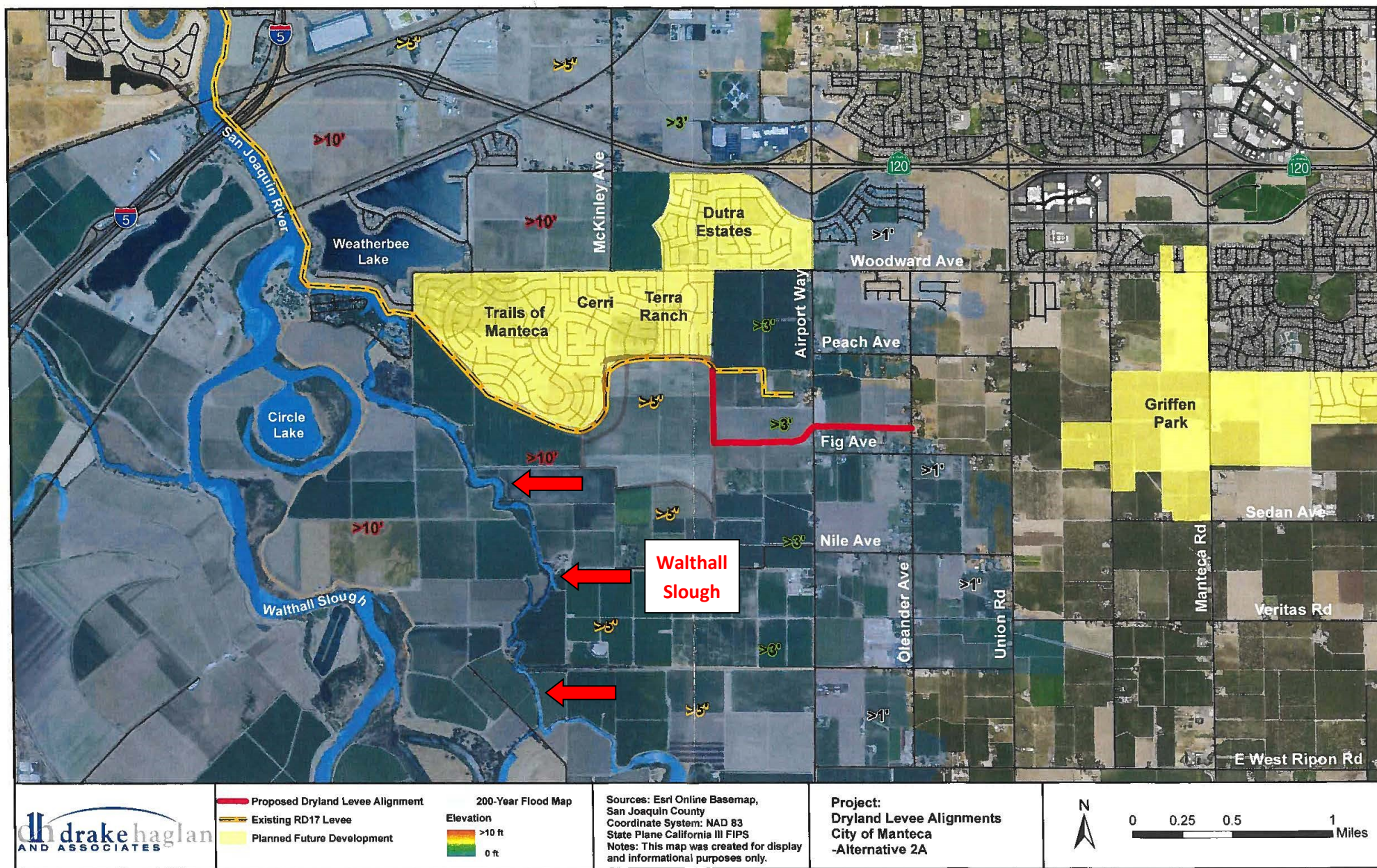
QUESTION: In consideration of the hydrology impacts stated on page 4-8 of the Draft March 2017 San Joaquin River Basin-Wide Feasibility study, what impact will Paradise Cut Bypass downstream water flows have on Old River drainage flows and San Joaquin River and associated tributary state increases or decreases affecting channel elevations for all areas of the Lower South San Joaquin River Basin?

QUESTION: What additional hydrology impacts may be created resulting from reverse flows along Old and Middle Rivers as identified on pages 3A-28 and 3A-29 of the Bay Delta Conservation Plan California WaterFix Final EIR/EIS (December 2016)?

Google Maps Walthall Slough



Imagery ©2017 Google, Map data ©2017 Google 2000 ft



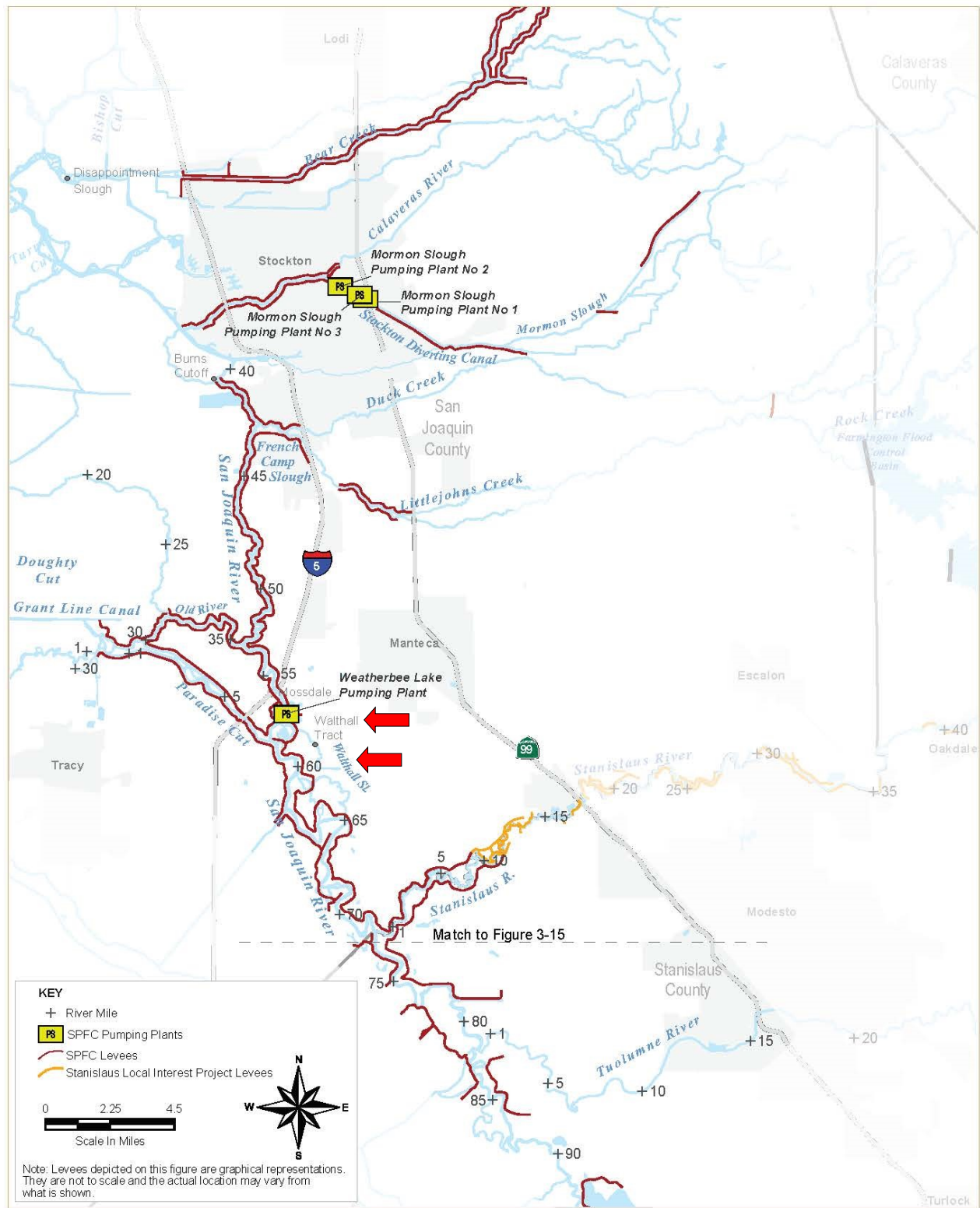
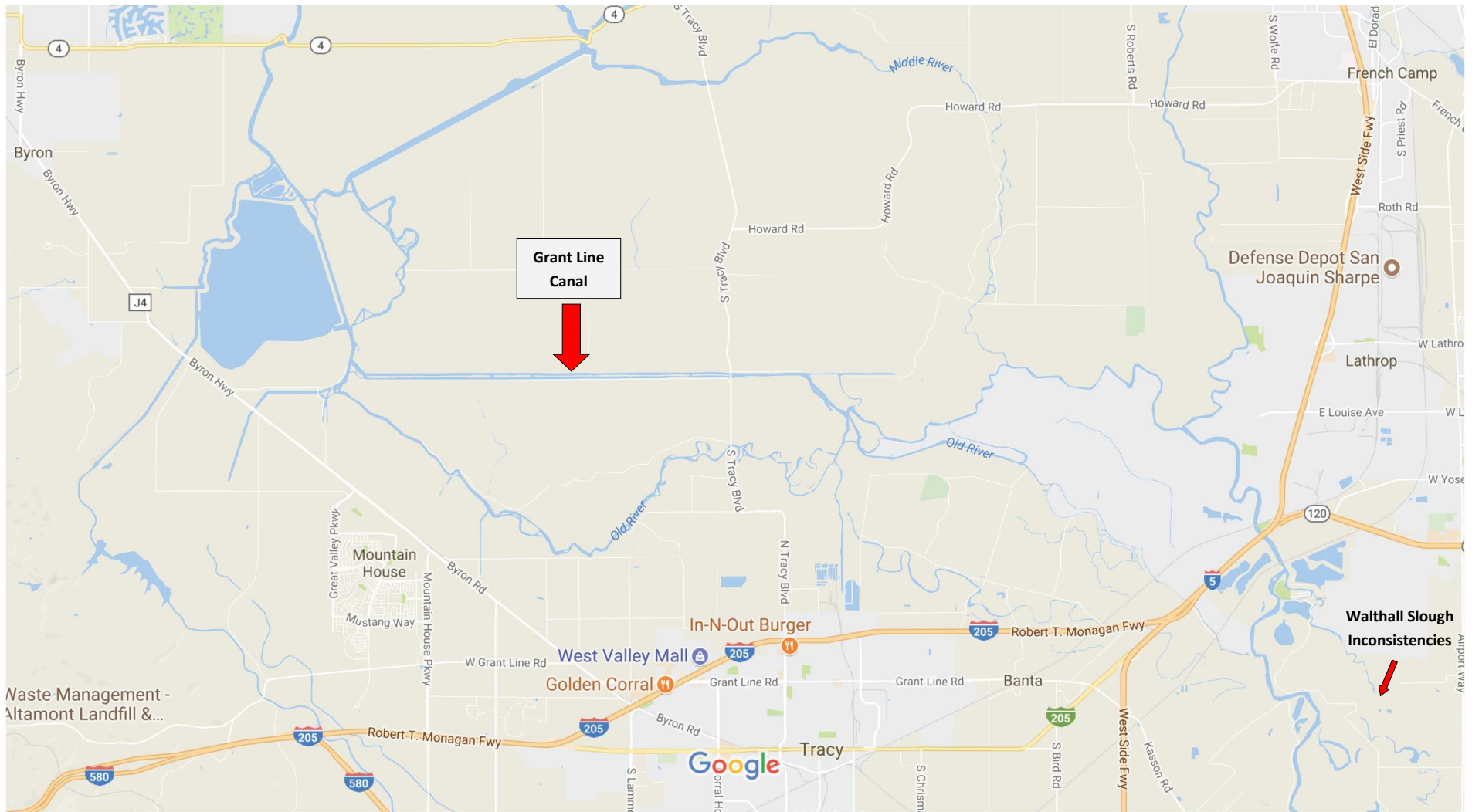
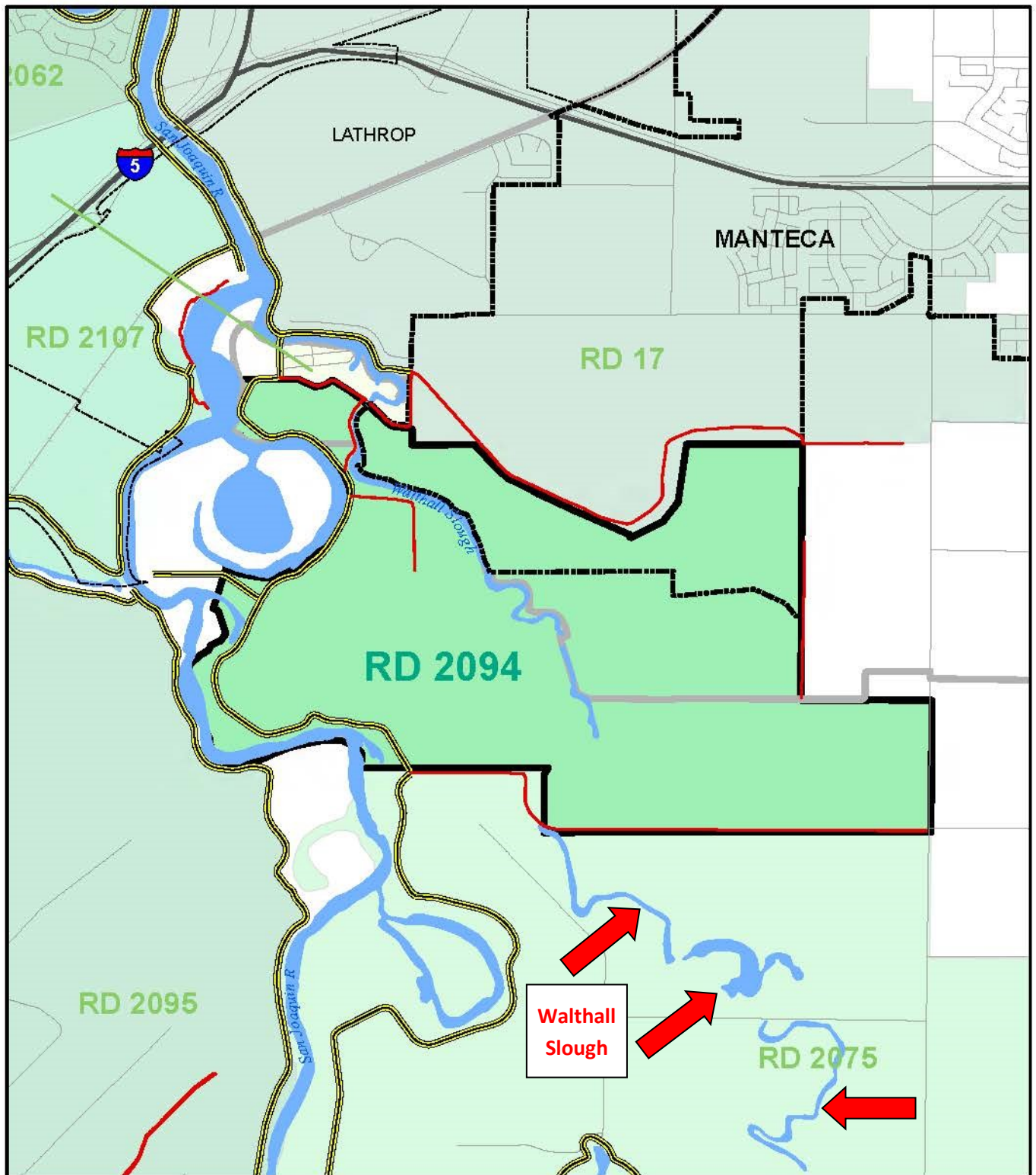


Figure 3-16. San Joaquin River Watershed – State Plan of Flood Control Facilities Along the San Joaquin River and Major Tributaries and Distributaries from Stanislaus River to Disappointment Slough

Map data ©2017 Google 2 mi



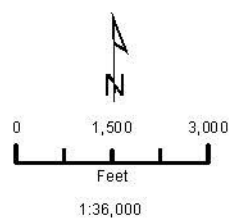
Legend

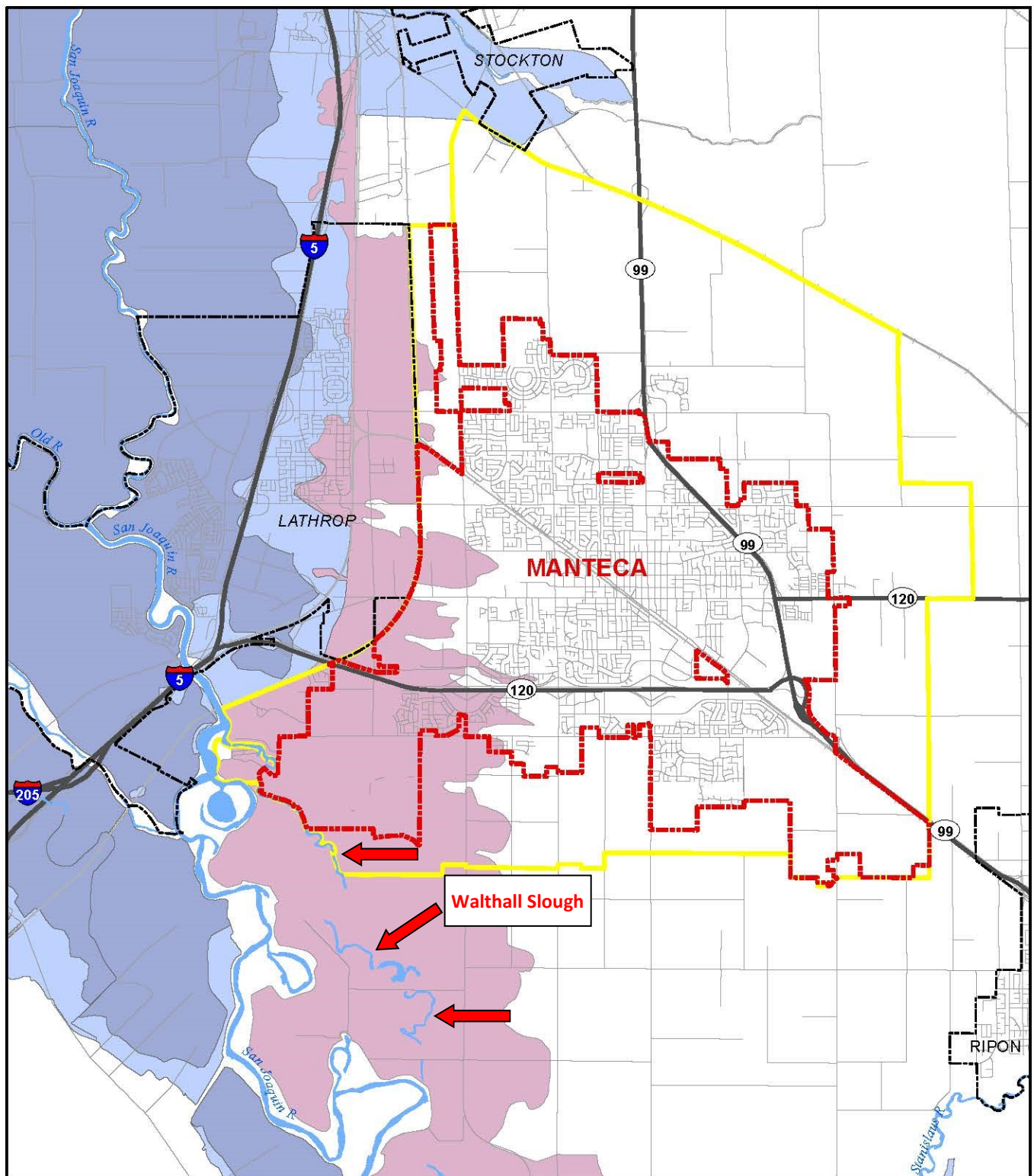
- Reclamation District 2094
- City of Manteca
- Other Cities
- City of Manteca Sphere of Influence
- State-Federal SPFC Levee
- Non-SPFC Levee

Sources: California Department of Water Resources;
San Joaquin County, California. Map date: April 11, 2016.

MANTECA SB 5 SAFETY ELEMENT AMENDMENT

Figure 7: Reclamation District 2094
and Levee System





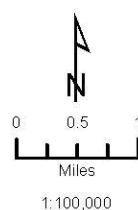
Legend

- City of Manteca
- Other Cities
- City of Manteca Sphere of Influence
- Levee Flood Protection Zone
 - Shallow
 - Deep
 - Depth Unknown

Sources: California Department of Water Resources;
San Joaquin County; CalAtlas. Map date: April 11, 2016.

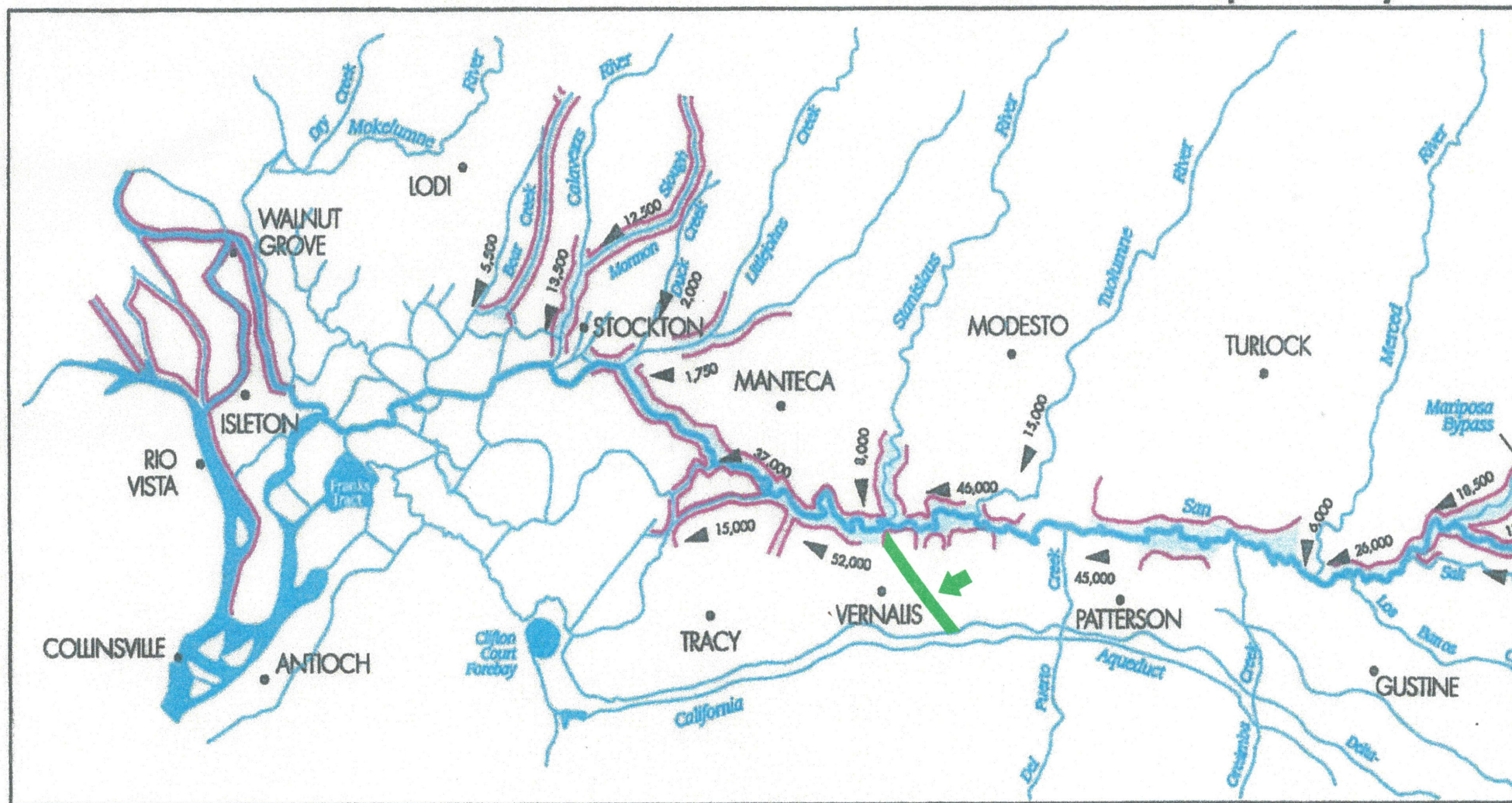
MANTECA SB 5 SAFETY ELEMENT AMENDMENT

Figure 11: DWR Levee Flood Protection Zones



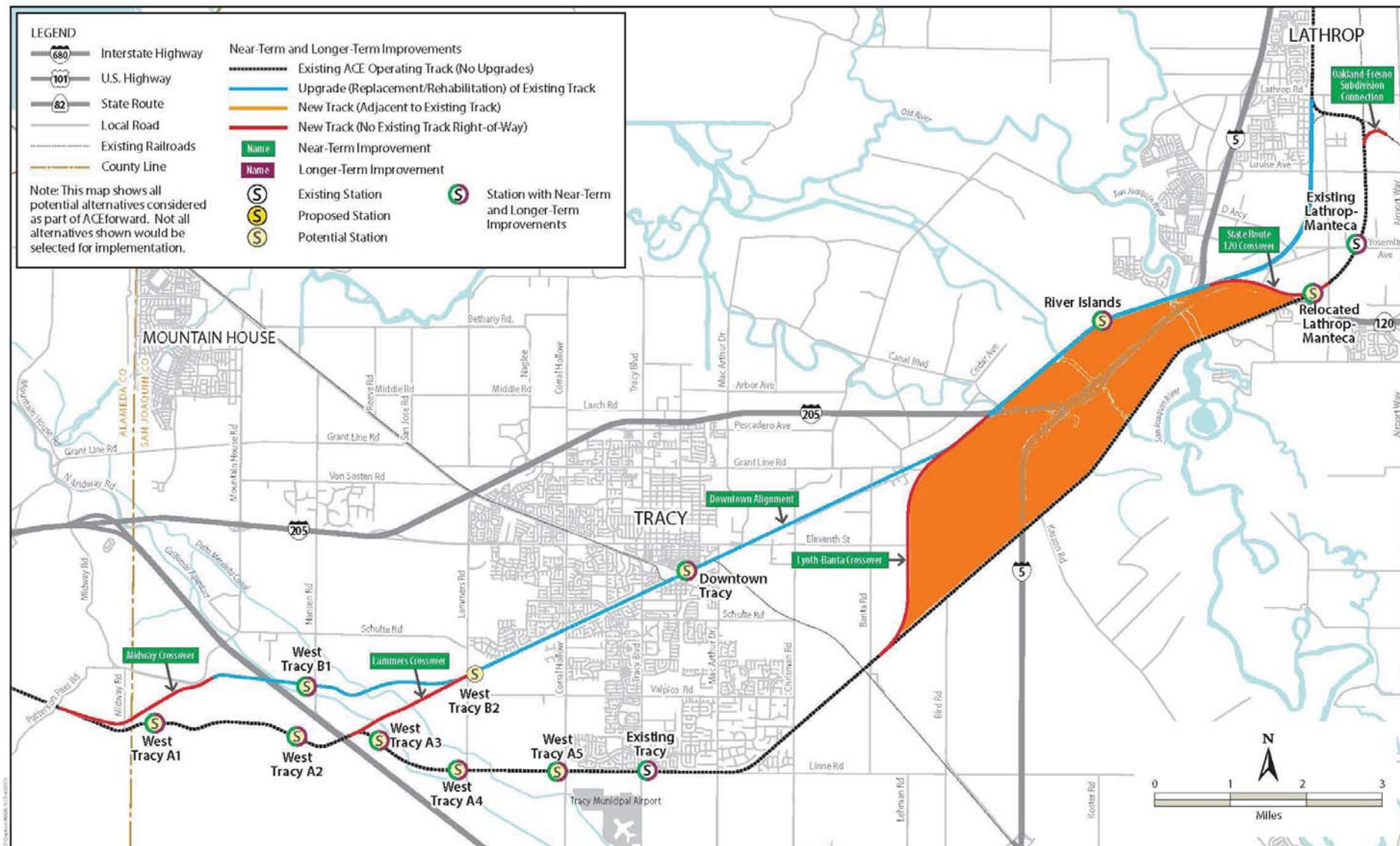
Conceptual Vernalis Bypass Design

Delta and San Joaquin Valley Flood



— Project Levees Maintained by Reclamation, Levee, and Drainage Districts and Municipalities

▲ 45,000 Estimated Channel Capacity (in cubic feet per second)

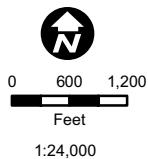
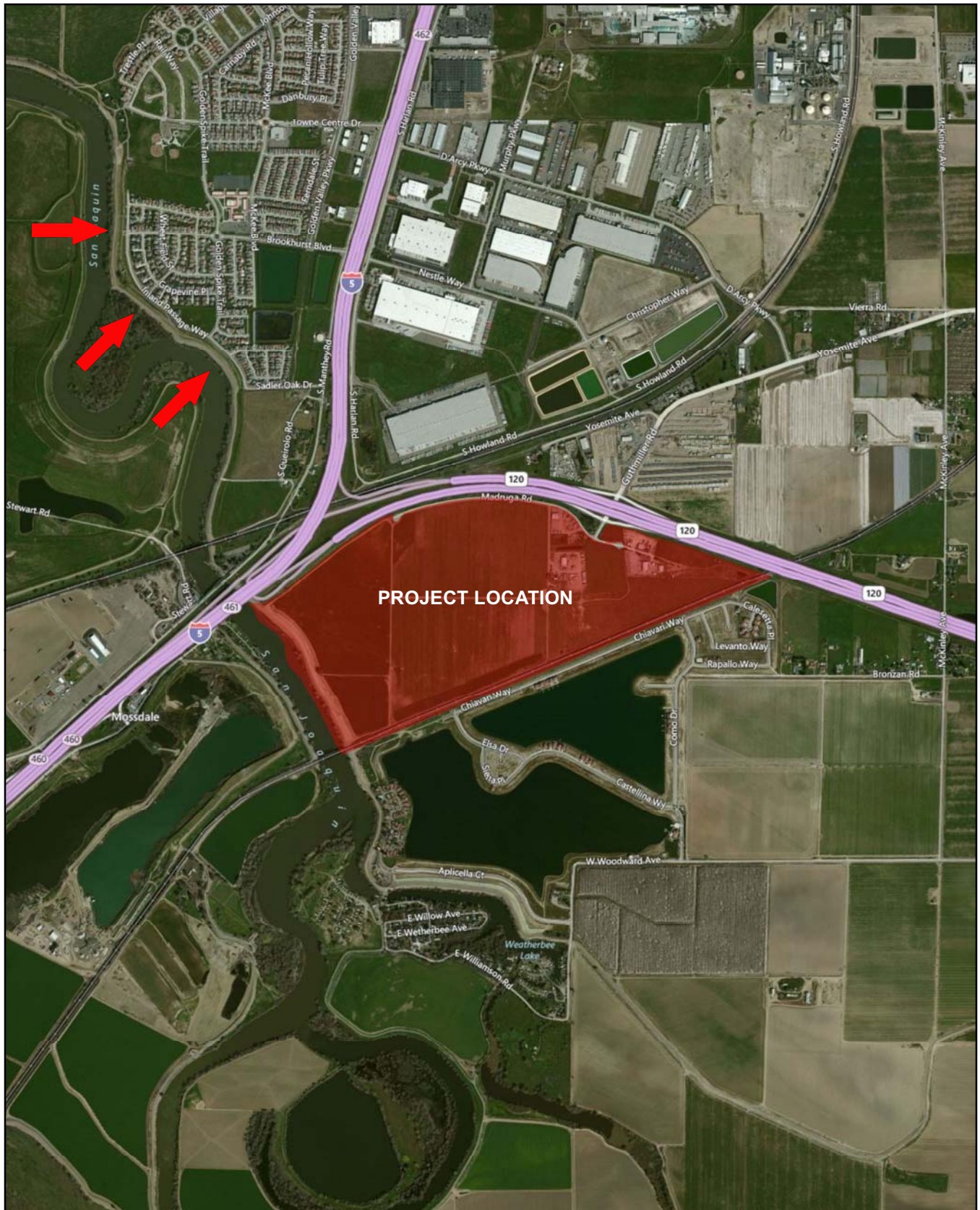


TERRA LAND GROUP, LLC

ENCLOSURE**Three Petitions Submitted by Manteca Residents Requesting Environmental Impact Reviews**

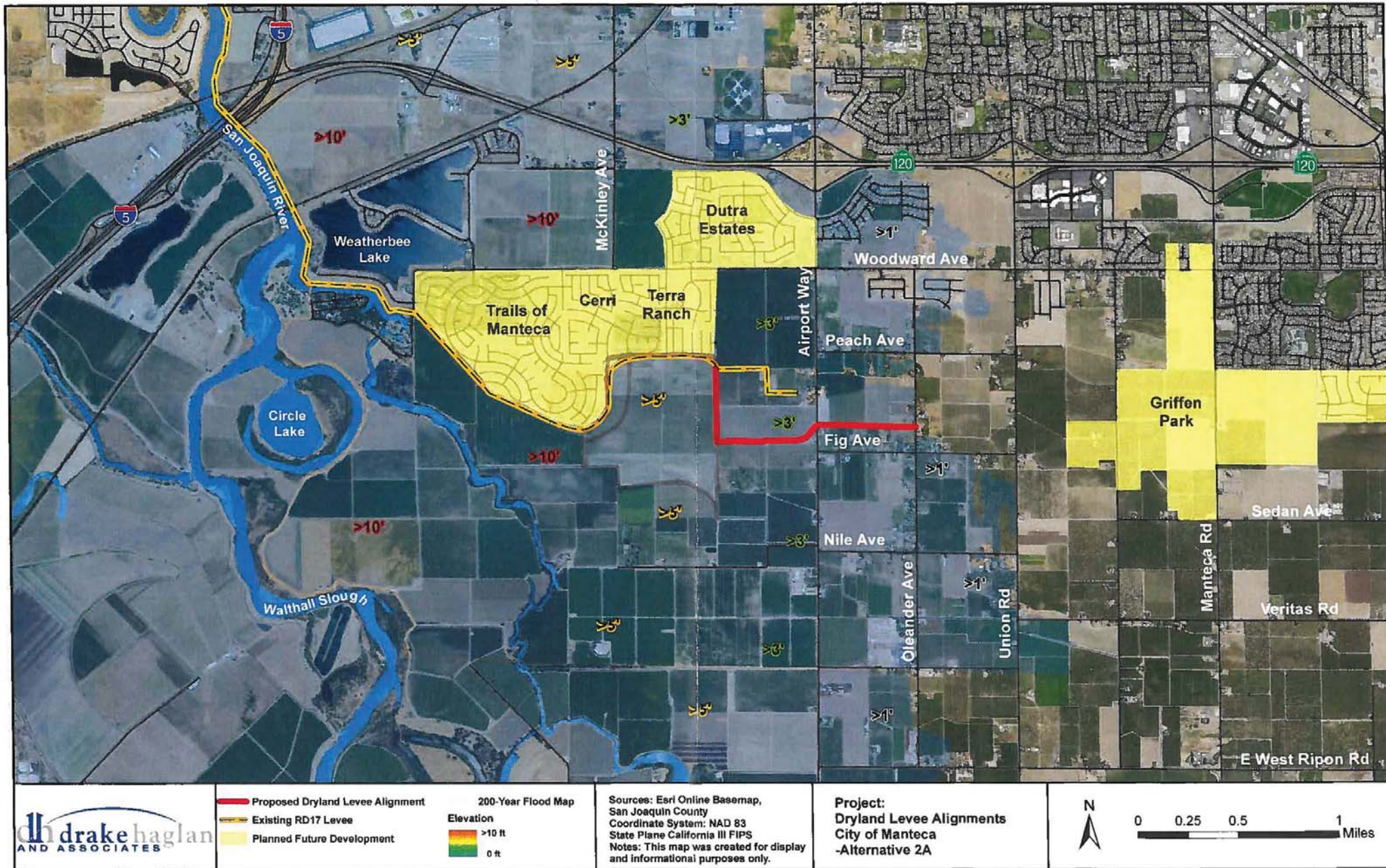
Please access these files using the provided Dropbox hyperlinks:

1. Petition dated March 27, 2017: REQUESTING INCLUSION OF A COMPREHENSIVE ENVIRONMENTAL FLOOD LEVEE IMPACT REVIEW AS PART OF GENERAL PLAN
(<https://www.dropbox.com/s/hskydq3k8m6j3ln/2017-03-27%20Petition.pdf?dl=0>)
2. Petition dated August, 2017: REQUEST FOR FULL AND COMPLETE ENVIRONMENTAL REVIEW CONSIDERING ALL FORESEEABLE PROJECTS, FEASIBILITY STUDIES AND SB5-RELATED PUBLIC ENTITY APPROVALS FOR CUMULATIVE ANALYSIS OF FLOOD IMPACTS AFFECTING THE LOWER SAN JOAQUIN RIVER
(https://www.dropbox.com/s/ay9y4nuh6cv8g/2017-08-29_EIRPetitions.pdf?dl=0)
3. Petition dated February, 2018: PETITION REQUESTING A MORATORIUM ON BUILDING UNTIL A SAFE AND SENSIBLE FLOOD CONTROL MANAGEMENT PLAN IS DEVELOPED THAT CONSIDERS EVERY MEMBER OF OUR COMMUNITY
(<https://www.dropbox.com/s/q1nnfib5ehfkevi/2018-02%20Petition%20-%20Moratorium%20on%20Building.pdf?dl=0>)



Data sources: ArcGIS Online BING aerial images with labels
web mapping service. Map date: January 9, 2013.

SOUTH LATHROP SPECIFIC PLAN
Figure 2-4. Aerial Photo



San Joaquin County Development Projects

Development projects in the sphere of influence of Stockton, Manteca and Lathrop that have the potential to affect similar resource areas such as biological resources, air and noise, have been included for analysis.

Table 5-46: Development Projects within RD 17

Jurisdiction	Date Approved/ Anticipated	Location	Size	Major Environmental Impacts
City of Lathrop				
Mossdale Landing ^{1,2}	Much of the overall development is complete.	West of I-5, adjacent SJR in RD 17	1,7000 units + commercial space	<i>West Lathrop Specific Plan Draft Environmental Impact Report</i> (City of Lathrop 1995:K-4)
Mossdale Landing East ^{1,2}	Much of the overall development is complete.	West of I-5, adjacent SJR in RD 17	430 units + commercial space	Significant Unavoidable Impacts Loss of Prime Farmland
Mossdale Landing South ^{1,2}	Much of the overall development is complete.	West of I-5, adjacent SJR in RD 17	450 units + commercial space	Increase in regional criteria air pollutant emissions Increase in light and glare Increase in traffic congestion Increased potential for flood damage
Central Lathrop Specific Plan ¹	Entitlements approved in 2004, annexed in 2005 ³ . Some utilities and roadways installed. No structures in place. No immediate plans for further construction.	West of I-5, adjacent to SJR in RD 17 (north of Mossdale Landing)	6,800 units + 5 million sq. ft. office and commercial	<i>Central Lathrop specific Plan Draft Environmental Impact Report</i> (City of Lathrop 2004: 7-1; 7-5) Significant Unavoidable Impacts Deficient level of service at intersections and highway segments Increase in regional criteria air pollutants during construction period Increase in long-term regional emissions Increase in traffic noise levels by 3 dBA or more Noise levels would exceed city's "normally acceptable" land use compatibility standards

Jurisdiction	Date Approved/ Anticipated	Location	Size	Major Environmental Impacts
				Loss of Important Farmland in categories of Prime, Statewide and Local Importance
River Islands	River Islands is currently working with the State and Federal agencies to finalize the permits needed to begin development. (City of Lathrop 2010).	Stewart Tract (bounded by Paradise Cut, SJR and Old River; north of I-205 and west of the SJR	Up to 11,000 units _ 2 golf courses, 45-acre town center, boat docks, 260 acres of parks, 600 acres of lakes and waterways, 600 acres of open space (City of Lathrop 2002). Includes improvements to Paradise Cut (a flood control bypass), consistent with the South Delta Flood Conveyance Plan	<i>Draft Environmental Impact Report for the River Islands at Lathrop Project (City of Lathrop 2002: 2-9 to 2-77).</i> Significant Unavoidable Impacts Degradation of freeway and ramp operations on I-205 Degradation of freeway and ramp operations on I-5 Increases in long-term regional emissions Odors associated with water reclamation plants Conversion of 3,620 acres of Important Farmland in the Prime and Statewide Importance categories Cancellation of up to 1,770 acres of Williamson Act contracts
South Lathrop Specific Plan ⁴	Pending – NOP/IS issued in 2006.	South of SR 120 at I-5/SR 120 split	689 acres GPA, prezone, annexation and SP	Environmental Review is pending
City of Manteca				

Jurisdiction	Date Approved/ Anticipated	Location	Size	Major Environmental Impacts
Trails Project ⁵	Environmental review process is beginning.	Southwestern portion of Manteca, southwest of the intersection of West Woodward Avenue and McKinley Avenue. Adjacent to the dry land levee and near Oakwood Shores.	477 acres, 1,651-unit residential development	Environmental review is pending
Terra Ranch ⁵	Tentative map application has been submitted. Environmental review process is beginning.	Southside of West Woodward Avenue, one-half mile west of Airport Way; southern boundary is adjacent to the dry land levee	Approx. 66 acres, 209 unit residential development	Environmental review is pending
Macado ⁵	The environmental impact report has been certified. No application to LAFCo has been made; approval of tentative map is pending.	Southwest corner of West Woodward Avenue and Airport Way; Southern boundary is adjacent to the dry land levee	Approx. 155 acres, 590 unit residential development	<i>Draft Environmental Impact Report for Machado Estates Vol. I</i> (City of Manteca 2007: ES-5; 3-12) Significant Unavoidable Impacts Conversion of Prime Farmland, Unique Farmland, Farmland of Statewide Importance (59.9 acres) pg 3-12 Increase in emissions of criteria pollutants Unacceptable LOS on freeway ramps and mainline segments and local roadways
City of Stockton				
Weston Ranch Towne Center Project ^{1,6}	City Council approved December 2, 2008. Much of overall development is complete.	West side of I-5, north side of French Camp Road	500,000 sq. ft large-scale retail, 210,000 sq. ft retail: shops, restaurants, commercial	<i>Weston Ranch Towne Center Mitigation Monitoring and Reporting Program</i> (City of Stockton 2008) Significant and Unavoidable Impacts

Jurisdiction	Date Approved/ Anticipated	Location	Size	Major Environmental Impacts
				Conversion of Prime Farmland (42.24 acres) Deficient level of service at Mathews Road/I-5 ramp Traffic impacts at French Camp Road/I-5 Interchange Increase in emissions of criteria air pollutants
San Joaquin County				
Oakwood Shores ⁷ (Oakwood Lake)	Approved and partially constructed. Roads and utilities in place, but less than 10 housing units in place. No immediate plans for further construction.	South of SR 120/580 between Lathrop and Manteca	480 lots, 264 constructed; approx. 45 will be eliminated for levee work ⁴	Not Applicable: Former sand and gravel extraction site and former site of Manteca Waterslides; was converted to lake and resort community; went into foreclosure in 2008
Notes: dBA = A-weighted decibels; I-5 = Interstate 5; GPA = general plan amendment; SP = specific plan; LAFCo = local agency formation commission; RD 17 = reclamation District No. 17; sq. ft. = square feet; SR 120 = State Route 120				
¹ City of Stockton 2006a:6-6 ² Mossdale Village Planning Area in the West Lathrop Specific Plan, approved in 2002 ³ City of Lathrop 2010			⁴ South Lathrop Specific Plan: Notice of Preparation/Initial Study (City of Lathrop 2006) ⁵ Durrer, pers. Comm., 2010 ⁶ Liaw. Pers. Comm., 2010 ⁷ Griffin, pers. Comm., 2010	
Source : Data compiled by AECOM in 2010				

5.23.4 PROJECTS REQUESTING SECTION 408 APPROVAL

Non-Federal project partners desiring to modify Federal works must request permission from USACE under Section 14 of the Rivers and Harbors Act of 1899 (33 USC 408), referred to as “Section 408 permission.” A number of projects in the Central Valley recently received 408 approval and others may request it. Table 5-47 summarizes those that received a letter of permission under Section 408 or that are seeking a letter of permission to alter a Federal project. These projects are listed for context.

Table 5-47: Projects Requesting Section 408 Approval

Project	Lead Agency	Letter of Permission Date
Letter of Permission Issued		
Cache Creek Setback Levee	DWR CA	22-May-13
West Sacramento Levee Improvement Project - CHP	WSAFCA	29-Jun-11
West Sacramento Levee Improvement Project - Rivers	WSAFCA	29-Jun-11
West Sacramento - I Street Bridge	WSAFCA	2010
TRLIA - Bear River Setback Levee + UPIC	TRLIA	19-Jun-06
TRLIA - Upper Yuba River Levee Improvement Project	TRLIA	24-Mar-11
TRLIA - Feather River Segment 2	TRLIA	12-Dec-06
TRLIA - Feather River Segment 1 and 3	TRLIA	3-Aug-07
TRLIA - Toe Road	TRLIA	9-Jul-13
Natomas Levee Improvement Project - Natomas Cross Canal, Phase 1	SAFCA	19-Jul-07
Natomas Levee Improvement Project - Sacramento River, Phase 2	SAFCA	2/20/2009 & 5/22/2009
Natomas Levee Improvement Project - Natomas East Main Drainage Canal, Phase 3	SAFCA	20-Apr-10
Natomas Levee Improvement Project - Sacramento River, Phase 4a	SAFCA	7-Mar-11
Feather River - Star Bend	LD1	16-Jun-09
Mid Valley - Knights Landing Ridge Cut	KLRDD	17-Apr-14
Anticipated Future Letters of Permission		
RD 17 - Mossdale	RD 17	2015
Southport	WSAFCA	2015
River Islands	City of Lathrop	2017
California Water Fix	DWR	To be determined

5.23.5 CUMULATIVE IMPACT ANALYSIS

The following describes the project's potential contribution to cumulative effects on each resource topic presented in Sections 5.1 through 5.21.

Geology and Geomorphology

Other development in the study area would be subject to the same types of geology and geomorphology as the LSJR Project. However, these types of impacts represent site-specific effects and do not result in a greater combined impact than the individual impacts. Further, the proposed levees would continue to affect local geomorphological process similar to existing conditions and would not further alter the natural river meander or deposition. Therefore, no cumulative effect would occur.

Additional Manteca-Area Projects to Consider in Relation to Flood Mitigation:

**Various Projects Identified in the Central Valley Flood Protection Plan 2017 Update Draft Technical Memorandum - CVFPP Investment Strategy,
August 2017**

Table B-5. San Joaquin Basin Management Actions Included within the 2017 Refined SSIA Portfolio

#	Lead Agency	Project Name	Project Description
48	Lower San Joaquin River LMAs	Dredge SJ River from Paradise Cut to Stanislaus River	Regional project for all LMAs in the Lower San Joaquin River region.
82	California Department of Water Resources	Forecast-Informed Operations for Tuolumne River Watershed	This project of the San Joaquin BWFS would incorporate FIO pre-releases coupled with increasing objective release for Tuolumne River. This element was included in the State Recommended Plan because it provides large stage reduction along Tuolumne River and stage reduction along San Joaquin River near higher risk areas for a severely flood storage limited watershed for limited costs. FIO seeks to coordinate flood releases from multiple reservoirs located in various tributaries of a major river to optimize the use of downstream channel capacity, the use of total available flood storage space in the system, and eventually to reduce overall peak flood flows downstream from these reservoirs. While there could be an almost infinite number of FIO operational scenarios, this reconnaissance evaluation used a 46,000-cfs flow objective for San Joaquin River at Vernalis as an operational constraint, which is a key location for San Joaquin River flow conditions, to begin exploring FIO opportunities.
163	California Department of Water Resources	Paradise Cut Bypass Expansion (BWFS Option M-Ag-Focused):	Paradise Cut, located on the southwestern side of Steward Tract in Lathrop, is a federal flood control bypass that diverts flows from the San Joaquin River during high flows. A Paradise Cut bypass expansion was broadly defined in the 2012 CVFPP as an element to improve flood risk management and provide ecosystem benefits in the San Joaquin River Basin. This element of the San Joaquin BWFS includes Paradise Cut Bypass Expansion Option M Ag-Focused. This option would include a combination of new secondary upstream weir, 4,000 to 7,000 feet of left bank setback levees on Paradise Cut, downstream levee improvements, and the Base Case improvements. This element removes revetment and restores shaded riverine aquatic habitat along the degraded San Joaquin River levee and restores the southern portion of the current inchannel bar for floodplain rearing habitat. However, most of the land within the setback area would be kept in agricultural production. This option was selected because it provided balanced mix of more than 2.5 feet stage reduction along the San Joaquin River for large flood events, significant ecosystem benefits through riparian habitat restoration and increased shaded riverine aquatic cover, and agricultural stewardship. Over the long-term future, portions of the setback areas could be converted to habitat with willing landowners and in coordination with local land use agencies.

Additional Manteca-Area Projects to Consider in Relation to Flood Mitigation:

Various Projects Identified in the Central Valley Flood Protection Plan 2017 Update Draft Technical Memorandum - CVFPP Investment Strategy, August 2017

#	Lead Agency	Project Name	Project Description
164	California Department of Water Resources, Delta South LMAs	Paradise Cut Expansion	The Paradise Cut Improvements consist of a “base case,” “initial improvements,” and five alts for an expansion of the Paradise Cut bypass. The initial improvements include these projects in addition to the base case: dredging of Salmon Slough/Doughty Cut, widening of Paradise Weir from 180 ft. to 400 ft., and performing a channel cut between Salmon Slough and Doughty Cut.
195	Reclamation District 2064	Reclamation District 2064 Address PL84-99 Deficiencies	The District (RD 2064) would like to bring upgrade deficient levees to the PL 84-99 standard.
196	Reclamation District 2064	Reclamation District 2064 Erosion Protection	The District noted erosion repairs are an expensive on-going part of their annual O&M. A specific problem area is at the northern boundary of the District near RD 2075. These erosion sites are in need of repair. The District would also like to have the west face of the Ten Mile dryland levee protected with riprap but does not have the financial resources to undertake the project.
197	Reclamation District 2064	Reclamation District 2064 Seepage Repair	Critical seepage sites have been identified by DWR’s FSRP along District levees. Seepage repairs need to be made at these sites along RD 2064 levees adjacent to both the San Joaquin and Stanislaus River.
201	Reclamation District 2075	Reclamation District 2075 Erosion Protection	The District noted erosion repairs are an expensive on-going part of their annual O&M. Specific problem areas were not identified, as District staff believes that the whole levee along the San Joaquin River is in need of protective rock placement.
202	Reclamation District 2075	Reclamation District 2075 Geometry Improvements	The District would like to upgrade deficient levee segments to meet the PL 84-99 Standard.
203	Reclamation District 2075	Reclamation District 2075 Restore Design Capacity of the SJ River	The District needs this silt buildup in the San Joaquin River to be removed to restore the design capacity and reduce the hydraulic load on its levees. This is a regional project that would benefit several Rds.
204	Reclamation District 2075	Reclamation District 2075 Seepage Repair	Critical seepage sites have been identified by the FSRP along District levees. Identified seepage concern sites are in need of repair.
213	Reclamation District 2094	Reclamation District 2094 Geometry Improvements	The existing levee needs a larger cross section. The land-side slope of the levee along the San Joaquin River is currently steeper than 3:1. Levee geometry improvements would increase the stability of the levee, and bring it up to current standards.
214	Reclamation District 2094	Reclamation District 2094 Improve Dryland Levees	The dryland levee located on the south boundary of RD 2094 is lower and less reliable than the levees along the San Joaquin River and was overtopped in 1997 when RD 2075 flooded. This levee was originally constructed to protect RD 2075 in the event of a failure of a levee downstream (north) on the San Joaquin River. Furthermore, this cross levee is one of only two means of egress during a flood event. This project would improve this levee to protect RD 2094 from flooding in RD 2075, and would improve public safety.

Additional Manteca-Area Projects to Consider in Relation to Flood Mitigation:

Various Projects Identified in the Central Valley Flood Protection Plan 2017 Update Draft Technical Memorandum - CVFPP Investment Strategy, August 2017

#	Lead Agency	Project Name	Project Description
215	Reclamation District 2094	Reclamation District 2094 Restore Design Capacity to San Joaquin River	RD 2075 needs this silt buildup in the San Joaquin River to be removed to restore the design capacity and reduce the hydraulic load on its levees. This is a regional project that would benefit several Rds.
216	Reclamation District 2094	Reclamation District 2094 Slope Stability Repairs, and Seepage Repairs	A slope stability repair site has been identified by the FSRP on the western side of the District along the San Joaquin River. Identified stability concern sites are in need of repair. The levee along the San Joaquin River is shown to have a moderate likelihood of failure due to seepage. A study should be conducted along this levee to determine the most appropriate seepage repair method, followed by implementation of the recommended action.
219	Reclamation District 2096	Reclamation District 2096 Geotechnical Assessment	The RFMP Team recommends a geotechnical assessment be done for the levees around this District.
220	Reclamation District 2096	Reclamation District 2096 Raise/Flood Proof Homes & Protect Utilities	Discussions with District representatives indicate that they would be interested in raising/flood proofing about 60 permanent homes above flood level. The remainder of residences are mobile homes. District representatives indicate that the mobile homes could be moved when flood threat increases.
237	California Department of Water Resources	RM 60-65 Setback Levee	This element of the San Joaquin BWFS would include an approximately 800 acre right bank San Joaquin River setback levee to achieve 50 year LOP and to address known levee seepage, stability, and geometry problems. Land in the setback area would stay in agricultural production but would be inundated more frequently through the purchase of flowage easements. This element was included in the State Recommended Plan because it would increase the LOP from 30 year to 50 year, provide limited stage reduction, reduce levee length and associated O&M and repair costs, provide ecosystem restoration benefits, and promote agricultural stewardship for similar costs to fix-in-place levee improvements.
240	(N/A)	San Joaquin River Basin Sediment Status and Dynamics Study	For the entire San Joaquin River basin, 1) conduct a multi-year monitoring program, 2) develop a reach-based sediment budget and conceptual model of sediment processes, and then 3) develop one or more sediment transport models and analyze transport processes to develop sediment management recommendations at a basin-wide scale. \$2.5 - 5 million for Phase 1, assuming a 5-year monitoring effort and analysis of monitoring conducted in Years 1 and 5.



City of Manteca Planning Commission

STAFF REPORT**ITEM 7.2**

MEETING DATE: March 25, 2014**SUBJECT:** Projects under review by the Planning Division and Housing Inventory Update.

BACKGROUND:

At the Planning Commission meeting of February 25th Commissioner Alaniz requested information regarding development projects the Planning Commission could anticipate reviewing throughout the year. In response to this request the Planning Division has provided a copy of the Planning Division Projects List.

The Planning Division maintains a projects list that is regularly updated to include new projects as well as status updates for projects currently under application. We also include the status of projects that have already been reviewed and approved as they work through the development process toward construction. Generally speaking this process requires review of final map and improvement plans, compliance with environmental mitigation monitoring, and compliance with conditions of approval.

We have also included a copy of the most recent Housing Inventory table and map that includes a listing of the City's approved and developing residential projects (Finished), approved not developing (Entitled), and those that are under application (Pending).

Attachment 1: Planning Projects List.**Attachment 2:** Housing Inventory Table and Map**Report Prepared By:**

Mark Meissner, Planning Manager

3-20-14
Date

**Planning Division
Current Project List
UPDATED: 03/20/2014**

Active Projects						
Project Name	Appl. Date:	Project #/ Type	Description	Status	Priority	Approving Body
Fiore Development	03/17/2014	SDN-14-77-02	Tentative Parcel Map to subdivide the 7.8-acre commercial property at 2010 Crestwood Avenue into 5-parcels.	Application Received and Routed for comments.		PC
Pillsbury Estates Unit 2, GMO	03/14/2014	GMO-14-481-01	Growth Management Application for March requesting 72 allocations for Unit 2 of the Pillsbury Estates subdivision.	Application Received and Routed for comments.		CDD
Panera Bread	03/06/2014	SPC & UPN 14-78-02	Site Plan Review and Minor Use Permit Entitlement Processing for Panera Bread with a drive-thru at 1337 E. Yosemite Av.	Application Received and Routed for comments.		PC
Danna Parcel Map	03/04/2014	SDN-14-77-01	A Large Lot Tentative Parcel Map to subdivide approximately 224-acres into 4 parcels that establish future developable areas including a 17-acre school site. NW corner of Woodward and McKinley.	Application Received and Routed for comments. Comments due 03/28		PC
Dutra/Danna Lot Line Adjustment	02/27/2014	LLA-14-47-03	Lot Line Adjustment to reconfigure existing parcels to allow for an equal swap of land area at the future intersection of McKinley and Atherton.	Application Received and Routed for comments.		CDD
Stadium Square Lot Line Adjustment	02/25/2014	LLA-14-47-02	Lot Line Adjustment to reconfigure existing Parcels to accommodate the pending site plans to establish an ARCO AM/PM and a Taco Bell in the area that was previously planned for a stand alone Pharmacy/Store. SW corner of Daniels and Fishback	Application routed to FC on 3/11, due back 3/24		CDD
Manteca Veterinarian Hospital	01/28/2014	SPC-14-78-01	Site Plan Review to construct a new 5,376 sq. ft. Veterinarian Hospital to replace the existing vet hospital at 911 Moffat Blvd.	Application received. Routed for comments.		PC
Raymus Homes Model Home Complex (Oleander Estates, Unit 1)	01/13/2014	TUP 14-48-03	A Temporary Use Permit for a temporary sales trailer and model home complex for Raymus Homes. SE corner of Oleander and Sephos.	Application Received and Routed 01/17/14 w/comments due 01/29/14; MK sent incomplete letter on 2/5; applicant resubmitted on 3/6, waiting for comments due back 3/20		CDD
550 Commerce Court	11/21/2013	MPM & LLA 13-57-10	Minor Plan Modification and Lot Line Adjustment to add land to the parcel to accommodate a new row of parking for the project site.	Project route complete; sent incomplete letter on 12/20 due to unresolved landscape issues-- LLA may need to be moved; waiting for resubmittal--architect called 2/27--working out issues with applicant		CDD
Tesoro Park	11/21/2013	GPA, REZ, PD Amend, SDJ, IS/MND 13-96-04	General Plan Amendment, Rezone, and PD Amendment to redesignate the existing 8-acre MUSD school site within the Tesoro subdivision for development as 25 additional single family homes.	MM met with project engineer regarding the entitlement process and timing 08/02/2013. Application Received. Routed, comments due 12/4 w/comments due 01/02. Project assigned to Kang on 3/18.		PC to CC
Clearwater Creek	11/21/2013	SPPA, SDJ, IS/MND 13-91-02	Specific Plan Amendment to redesignate the existing 9-acre school site within the Union Ranch East subdivision for development as 33 additional single family homes.	MM met with project engineer regarding the entitlement process and timing 08/02/2013. Application Received. Routed, comments due 12/4 w/comments due 01/02. Project assigned to Kang on 2/20; Project rerouted on 3/6; due back 3/25		PC to CC
Oakwood Trails at Tara Park	10/31/2013	GPA, REZ, SDJ 13-96	General Plan Amendment to redesignate an area of land from BIP to CMU, Rezone to make consistent with GP amendment, and a Tentative Subdivision Map and EIR for a 578 single family residential lot subdivision on 206.7-acres APN 241-260-02, 03, & 07. NW corner of Woodward and McKinley.	Meeting with Project Engineer 05/30/2013 indicates that the project will move forward. Follow-up meeting on 07/16 with project engineer to discuss design challenges identified at May meeting. Application Received. Application Routed 11/08 with comments due 12/06. letter sent 12/17/13, meeting scheduled for staff to discuss S Manteca land uses for 1/8/14.		PC to CC
Hookah Lounge	10/21/2013	MCA 13-90-01	Municipal Code Amendment request to include Hookah Lounges	Application received. Routed for comments 11/7. MM to contact applicant and schedule for public hearing w/PC.		PC to CC
Project Laurie	10/11/2013	SPC-13-78-02	Site Plan Review for a 1,228,500 sq. ft. concrete tilt-up structure. SW corner of Roth Rd and Airport Way.	Application materials routed 10/15. Project site meeting 10/22. Comments due 10/29. Incomplete letter delivered 11/5. Applicant put project on hold.		PC to CC
Oleander Estates DAA	09/25/2013	DAA 13-97-01	Development Agreement Amendment	Project file created and assigned. Applicant reviewing draft agreement.		PC to CC
Alma Apartments	09/13/2013	SPA & SDN 13-78-01	Site Plan for a 184-unit apartment and/or condominium complex and tentative parcel map to create 4 parcels for the new project area. Extension of Center St. west	Project routed, completeness letter to be sent out week of 10/7. Awaiting resubmittal, and begin Initial Study.		PC to CC

Orange: Non Statutory

Blue: Non Statutory Contingent on MSR

Red: Statutory

South of Woodward Area (SOWA), Woodward Park 1	04/03/2013	13-99-01 DA, PRZ, ANX, SDJ & EIR	Tentative Subdivision Map, Rezoning, Annexation, Development Agreement & Environmental to establish a 171-lot single family residential community. East of Pillsbury.	NOP posted at Clearinghouse on 10/7, and distributed to local agencies. Scoping meeting scheduled on 10/22 in CC Chambers at 3pm. Applicant working on updated Phase 1 to include pesticides. RLC also working on design changes to allow for connection point into Hat Ranch to the south. Admin Draft EIR submitted and reviewed by City. Awaiting Applicant comments on ADEIR. Screencheck submitted 3/2/2013 to go over final review and distribute NOA/NOC for 45-day review.		PC to CC
South of Woodward Area (SOWA), Woodward Park 2	04/03/2013	13-99-02 DA, PRZ, ANX, SDJ & EIR	Tentative Subdivision Map, Rezoning, Annexation, Development Agreement & Environmental to establish a 185-lot single family residential community. East of Pillsbury.	Same as Woodward Park 1, Applicant working on updated Phase 1 to include pesticides.		PC to CC
Hat Ranch	05/08/2013	13-99-03 ANX, GPA, PD, PRZ, SDV, DA, EIR	Tentative Subdivision Map, General Plan Amendment, Rezoning, Annexation & Environmental to establish an 810 lot age restricted single family residential community with a 30,000 sq. ft. Community Center.	NOP completed. Met with applicant on 12/11 to discuss FC's substantial circulation changes. Applicant is attempting to address. 12/16 City staff, Raney and Kennedy Jenks met to discuss WSA. Followup WSA meeting with PW on 2/27. Traffic study delayed due to timing of requested revisions to circulation, and relation to Evans Estates. Received partial ADEIR on 3/2/13, applicant and city review currently underway.		PC to CC
Monte Bello Estates (Ott)	05/29/2013	13-75-02 SDJ, GPA, REZ, IS	Tentative Subdivision Map, General Plan Amendment, Rezone, and Initial Study for 121 low density residential lots on 30-acres. APN 202-220-07	Application materials under review prior to initial routing and review. Application routed for initial review 06/21/2013 with comments due 07/11/2013. RH to prepare letter regarding comments received on original map, and to meet with FC & MH on revised map. MM to request memo from MH RE: Caltrans request for TIS. Revised application to include GPA for CMU at Airport and Louise. 9/11/13 Staff waiting for resubmittal. Proposals for RFP to complete MND 10/21. Contract awarded for MND. Letter sent to applicant 11/20/13. 12/2/13 received check from applicant, contacted consultant to start work. Admin Draft MND to be available week of 02/10. NOA and Draft MND posted and under review.		PC to CC
LED Sign	07/25/2012	PDA, DAA, UPJ 12-73-02	Establish LED billboard at Promenade Shops	Request emailed to applicant requested formal submittal of proposal, too many emails via Don Smail have bogged down the process. ED sent letter pointing out the issues with the photometric study they've completed. Staff has requested that they address the glare/photometric so that we can prepare an initial study. Steve Craig to provide updated photometric and revenue agreement 10/21. 11/4 applicant tried to re-submit the same photometric without addressing anything in the comment letter, staff explained and now they are working on it again. Applicant resubmitted on March 3, 2014, will be routed and reviewed.		PC to CC
Family Entertainment Zone (FEZ)	Pending	GPA, REZ, PD, Master Plan	Entitlement processing & Environmental	Waiting for Project Description from Don Smail in order to prepare RFP for EIR. FC/DS prepare project description. RH preparing draft RFP for distribution. Distribution of RFP depending on legal determination 08/06/2013. MM met with Art Nunez RE: FEZ application (08/14). Final project description for RFP provided 08/16. MM Received draft application materials for review 08/28. RH working with DS to finalize RFP, waiting for revised project description 09/11/2013. MM Reviewed and commented on Master Plan proposals 10/21. Professional Services Agreement for EIR approved by CC 12/17/2013. MM to Kick-Off ASAP. NOP distributed 02/04/2014. Scoping Mtg. 02/20/14. EIR consultant waiting on WSA and Master Plan. No application materials or fees paid.		PC to CC
Great Wolf Lodge	Pending	GPA, REZ, PD, SPC	Entitlement processing & Environmental	Same as above.		PC to CC

Municipal Services Review & Sphere Of Influence Update	N/A	CITY INITIATED	Forthcoming annexations to the City will require an update of the MSR. Needs to be budgeted for and to find a consultant to complete. MSR updates are scheduled for each 5-years. The SOI update provides an opportunity for the City to amend its 10-year sphere to include areas not previously contemplated (e.g. Hat Ranch and Lathrop/99 interchange)	Received rough proposal and estimated cost from DeNovo Planning for review prior to formalizing proposal. MM requested funding from FC and City Manager. Preliminary budget indicates that the money will be available. MM shared MSR proposal w/MH. MH indicated that support for data collection/creation dependent on future staffing. MM to prepare Pro Serve Agreement 08/06/2013. MSR routed for review and approval 08/15. Currently in Finance 09/10. To City Manager for approval 09/12/2013. Approved by CM 09/23. Schedule Kickoff. Kicked off with DeNovo 09/27. MM to follow-up w/DeNovo. MM working with Pennie on Maps. MM to request status update. Received Admin Draft 01/09/13. Comments from CDD on Admin Draft to DeNovo 01/28/2014. Admin Draft to LAFCO for review and comment. ETA on LAFCO comments week of 04/14.		PC to CC
Bicycle & Pedestrian Master Plan Update	N/A	SVP Grant - CITY INITIATED	Update of the Bicycle Master Plan and addition of Pedestrian Plan. Smart Valley Places)	Mark Houghton requested participation by PW and emphasis of class 2 bike lanes on main roadways rather than class 3 on neighborhood streets. MM to route existing BMP to PW for comments. MM preparing binders of neighboring City and County BMP's and Manteca Circulation Element, and general plan goals/policies/implementation measures that promote bicycle and ped. Survey created and posted 09/09. Pulled Survey for analysis 10/23. Completed Survey Analysis and Needs section 12/14/13. Completed consistency section. Completed Goals & Objectives section. Working on Existing Conditions section.		PC to CC

Finished, Entitled, Master Plan And Pending Lots/Units
City of Manteca, Community Development

March 1, 2014

FINISHED LOTS (Approved Final Map, Ready To Build)

Application Date	Latest Final Map	Expiration Date	Project Name	Remaining Lots
9/29/2004	6/4/2007	N/A	Dutra Estates 4	3
3/3/2005	3/5/2013	N/A	Pillsbury Estates 1	89
4/4/2005	12/5/2005	N/A	Terra Bella	42
3/2/2005	12/18/2012	N/A	Union Ranch 1-5 & 7 (Pulte)	111
3/2/2005	11/6/2012	N/A	Union Ranch East 1-5	79
4/19/2005	11/21/2013	N/A	Oleander Estates Unit 2	118
4/19/2005	12/18/2013	N/A	Oleander Estates Unit 1	113
SUBTOTAL				555

FINISHED APT. UNITS (Approved Site Plan, Ready to Build)

Application Date	Approval Date	Expiration Date	Project Name	Remaining Units
12/13/2006	8/18/2008	N/A	Tesoro Apts.	148
3/11/2009	6/21/2011	6/21/2013	Terra Ranch Apts.	200
2/9/2012	12/11/2012	12/11/2014	Woodbridge Apts.	128
SUBTOTAL				476
TOTAL FINISHED LOTS AND UNITS				1,031

ENTITLED LOTS (Approved Tentative Map, Pending Final Map)

Application Date	Tentative Map	Expiration Date	Project Name	Remaining Lots
4/19/2004	6/16/2009	6/16/2017	Civello Estates	62
2/22/2008	10/20/2009	10/20/2017	Diego Country Estates	24
2/1/2010	11/2/2010	1/19/2019	Dutra Estates 5	49
10/28/2004	2/2/2010	2/2/2016	Evans Estates	586
6/10/2005	8/7/2006	12/17/2019	Lundborn	18
4/19/2005	10/19/2010	4/18/2024	Oleander	313
3/3/2005	2/2/2010	2/2/2016	Pillsbury Estates 2-	186
6/18/2004	1/17/2006	2/2/2019	Shadowbrook	497
12/22/2004	1/23/2007	4/18/2022	Sundance	451
3/11/2009	6/21/2011	6/21/2017	Terra Ranch	212
3/25/2009	2/15/2011	2/15/2017	The Trails	1,370
3/2/2005	8/1/2005	9/14/2019	Union Ranch 6 & 8-	427
2/22/2005	5/18/2010		Silva Estates (Blossom Grove)	93
9/25/2000	11/10/2004	7/6/2021	Villa Ticino West	708
9/14/2007	10/20/2009	10/20/2017	Winters Colonial	40
5/20/2013	11/5/2013	11/5/2015	Copper Cove (PKA Yosemite Square)	342
6/12/2013	2/8/2014	2/8/2016	Woodward Estates	72
TOTAL ENTITLED LOTS				5,450

MASTER PLAN LAND (Approved Land Area, Unmapped)

Application Date	Status	Project Name	Estimated Lots/Units
2/3/2005	348-AC Approved Master Plan	Austin Road Low*	1,748
2/3/2005	61-AC Approved Master Plan	Austin Road Med*	610
SUBTOTAL			2,358

MASTER PLAN LAND FOR APT'S & MIXED USE (Approved Land Area, No Site Plan)

Application Date	Status	Project Name	Estimated Lots/Units
2/3/2005	46-AC Approved Master Plan	Austin Road High*	1,012
2/3/2005	84-AC Approved Master Plan	Austin Road Mixed Use*	828
8/9/2010	17.3-AC Approved Master Plan	Yosemite Square High*	346
SUBTOTAL			2,186
TOTAL MASTER PLAN LOTS AND UNITS			4,544

PENDING LOTS (Subdivision Projects Under Application)

Application Date	Status	Project Name	Lots
4/25/2006	Project On Hold	Bright World	21
1/19/2005	Tent. Map and Annex. Under Review	Machado Estates	560
4/3/2013	Tent. Map and Annex. Under Review	Atherton Homes at Woodward Park 1	171
4/3/2013	Tent. Map and Annex. Under Review	Atherton Homes at Woodward Park 2	185
5/8/2013	Tent. Map and Annex. Under Review	Hat Ranch	800
5/29/2013	Tent. Map	Monte Bello Estates	109
10/23/2013	Tent. Map	Miller Terrace	76
10/31/2013	Tent. Map	Oakwood Trails at Tara Park	678
11/21/2013	Tent. Map	Clearwater Creek	33
11/21/2013	Tent. Map	Tesoro Park	25
SUBTOTAL			2,658

PENDING APARTMENT UNITS (Need Site Plan Approval)

Application Date	Status	Project Name	Units
3/25/2009	Needs Site Plan Approval	The Trails Apts.	280
9/25/2000	Needs Site Plan Approval	Villa Ticino West Apts.	163
9/13/2013	Needs Site Plan Approval	Amma Apts	184
SUBTOTAL			627
TOTAL PENDING LOTS AND UNITS			3,285

TOTAL FINISHED+ENTITLED SINGLE FAMILY LOTS	6,005
TOTAL FINISHED+ENTITLED+MASTER PLAN+PENDING SINGLE FAMILY LOTS	11,021
TOTAL FINISHED+MASTER PLAN+PENDING APARTMENT UNITS	3,289
GRAND TOTAL OF ALL UNITS AND LOTS	14,310

* Estimated lot/unit count based on historical lots/units per acre.

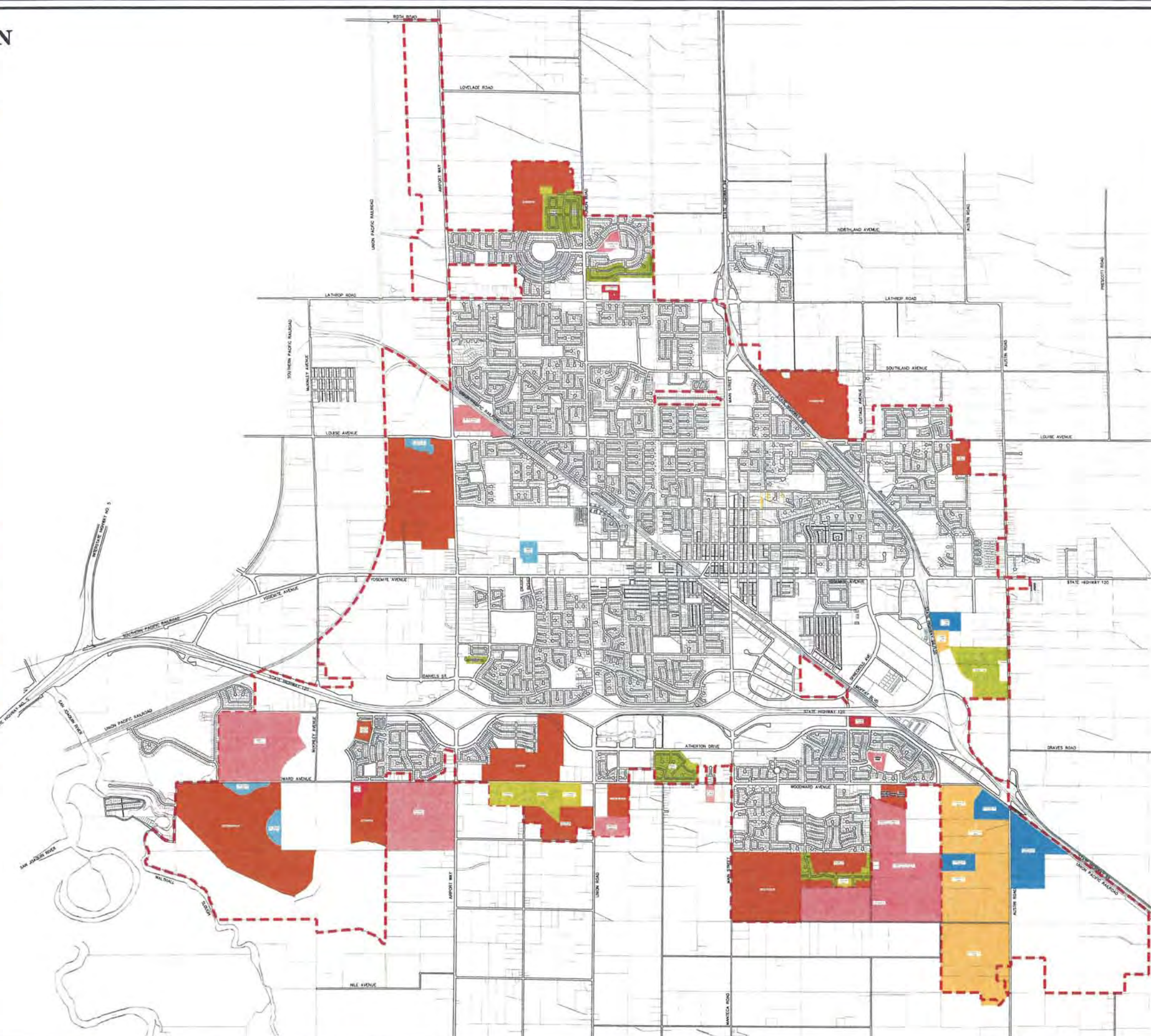
FINISHED, ENTITLED, MASTER PLAN
AND PENDING LOTS/UNITS

March 1, 2014

FINISHED LOTS (Approved Final Map, Ready To Build)				
Application Date	Latest Final Map	Expiration Date	Project Name	Remaining Lots
9/29/2004	6/4/2007	N/A	Dutra Estates 4	3
3/3/2005	3/5/2013	N/A	Pittsburg Estates 1	59
4/4/2005	12/5/2008	N/A	Terra Bella	42
3/2/2005	12/18/2012	N/A	Union Ranch 1-5 & 7 (Pulte)	111
3/2/2005	11/6/2012	N/A	Union Ranch East 1-5	79
4/18/2005	11/21/2013	N/A	Clearwater Estates Unit 2	118
4/18/2005	12/18/2013	N/A	Clearwater Estates Unit 1	113
SUBTOTAL				555
FINISHED APT. UNITS (Approved Site Plan, Ready to Build)				
Application Date	Approval Date	Expiration Date	Project Name	Remaining Units
12/13/2009	8/18/2008	N/A	Tesoro Apts	148
3/11/2009	6/21/2011	6/21/2013	Terra Ranch Apts	200
2/6/2012	12/11/2012	12/11/2014	Woodbridge Apts	128
SUBTOTAL				476
TOTAL FINISHED LOTS AND UNITS				1,031
ENTITLED LOTS (Approved Tentative Map, Pending Final Map)				
Application Date	Tentative Map	Expiration Date	Project Name	Remaining Lots
4/19/2004	6/16/2009	6/16/2017	Covello Estates	62
2/22/2008	10/20/2009	10/20/2017	Diago Country Estates	24
2/1/2010	11/2/2010	1/19/2019	Dutra Estates 5	48
10/28/2004	2/2/2010	2/2/2018	Evans Estates	586
8/10/2005	8/7/2008	12/17/2019	Lundborn	18
4/19/2005	10/19/2010	4/18/2024	Clearwater	313
3/3/2005	3/2/2010	2/2/2016	Pittsburg Estates 2	196
6/18/2004	1/17/2008	2/2/2019	Shadowbrook	497
12/22/2004	1/23/2007	4/18/2022	Sundance	451
3/11/2009	6/21/2011	6/21/2017	Terra Ranch	212
3/25/2009	2/15/2011	2/15/2017	The Trails	1,316
3/2/2005	8/1/2008	8/1/2016	Union Ranch 8 & 9	427
2/22/2005	5/18/2010		Siva Estates (Blossom Grove)	93
9/25/2000	11/10/2004	7/6/2021	Villa Torino West	708
9/14/2007	10/20/2009	10/20/2017	Winters Colonial	40
6/26/2013	11/9/2013	11/9/2015	Copper Cove (PKA Yosemite Square)	342
8/12/2013	2/8/2014	2/8/2016	Woodward Estates	72
TOTAL ENTITLED LOTS				5,450
MASTER PLAN LAND (Approved Land Area, Unmapped)				
Application Date	Status	Project Name	Estimated Lots/Units	
2/3/2005	340-AC Approved Master Plan	Austin Road Low*	1,740	
2/5/2005	61-AC Approved Master Plan	Austin Road Med*	610	
SUBTOTAL			2,350	
MASTER PLAN LAND FOR APT'S & MIXED USE (Approved Land Area, No Site Plan)				
2/3/2005	45-AC Approved Master Plan	Austin Road High*	1,012	
2/5/2005	64-AC Approved Master Plan	Austin Road Mixed Use*	828	
8/6/2010	17 3-AC Approved Master Plan	Yosemite Square High*	346	
SUBTOTAL			2,186	
TOTAL MASTER PLAN LAND AND UNITS				4,536
PENDING LOTS (Subdivision Projects Under Application)				
Application Date	Status	Project Name	Lots	
4/25/2006	Project On Hold	Bright World	21	
1/18/2005	Tent. Map and Annex Under Review	Manchado Estates	500	
4/2/2013	Tent. Map and Annex Under Review	Alhambra Homes at Woodward Park 1	171	
4/2/2013	Tent. Map and Annex Under Review	Alhambra Homes at Woodward Park 2	185	
5/6/2013	Tent. Map and Annex Under Review	Hat Ranch	800	
5/29/2013	Tent. Map	Monte Bello Estates	109	
10/23/2013	Tent. Map	Miller Terrace	76	
10/31/2013	Tent. Map	Oakwood Trails at Tara Park	676	
11/21/2013	Tent. Map	Clearwater Creek	33	
11/21/2013	Tent. Map	Tesoro Park	25	
SUBTOTAL			2,666	
PENDING APARTMENT UNITS (Need Site Plan Approval)				
Application Date	Status	Project Name	Units	
3/25/2009	Needs Site Plan Approval	The Trails Apts	280	
9/25/2000	Needs Site Plan Approval	Villa Torino West Apts	153	
9/13/2013	Needs Site Plan Approval	Amelia Apts	184	
SUBTOTAL			617	
TOTAL PENDING LOTS AND UNITS				3,283
TOTAL FINISHED+ENTITLED+MASTER PLAN+PENDING SINGLE FAMILY LOTS				9,005
TOTAL FINISHED+ENTITLED+MASTER PLAN+PENDING APARTMENT UNITS				3,283
GRAND TOTAL OF ALL UNITS AND LOTS				14,318

* Estimated lot/unit count based on historical lots/units per acre

* Estimated lot/unit count based on historical lots/units per acre



CITY OF MANTECA
COMMUNITY DEVELOPMENT DEPARTMENT

Additional Manteca-Area Projects to Consider in Relation to Flood Mitigation

Project Name	Lead Agency	Public Comments Previously Made by TLG
Manteca Conference Center/Hotel/Water Park Project	City of Manteca	
Family Entertainment Zone	City of Manteca	
ACEforward: Stockton to Merced & San Jose	San Joaquin Regional Rail Commission	08/30/2017 Letter to SJRRC 11/28/2017 Letter to SJRRC
ACE extension NOP (Sacramento to Merced)	San Joaquin Regional Rail Commission	1/30/2018 Letter to SJRRC
Oakwood Shores Annexation into City of Manteca	City of Manteca	
Antone Raymus/McKinley Expressway Extension SR 120 to Hwy 99 (2 to 6 lanes)	City of Manteca	01/22/2018 Letter to MPC 04/18/2017 Letter to MCC 12/12/2017 Letter to MCC
New Hwy 120/McKinley Interchange	CalTrans	
Atherton Drive road extension west of Dutra Estates	City of Manteca	
Highway 120 lane expansion	CalTrans	8/9/2017 Letter to SR-99/SR-120 Project
Interstate 5/Highway 120 Interchange improvements	CalTrans	
Oakwood Landing/Cerri & Denali Subdivisions	City of Manteca	9/6/2017 Letter to MCDD
Manteca Wastewater treatment regional plant expansion to include Lathrop, Ripon, Oakwood Shores, and Raymus Village	City of Manteca	2/5/2018 (Agenda Item C.11) Letter to MCC
City of Manteca/South San Joaquin Irrigation District stormwater conveyance improvements to French Camp Outlet Canal	City of Manteca	9/18/2017 Letter to MCC 12/12/2017 Letter to MCC 2/7/2018 Letter to LAFCo
City of Manteca Stormwater Drainage to Oakwood Shores	City of Manteca	9/18/2017 Letter to MCC
CenterPoint Industrial Park	City of Manteca	2/6/2018 Letter to MCC

Additional Manteca-Area Projects to Consider in Relation to Flood Mitigation

Blossom Estates	City of Manteca	2/6/2018 Letter to MCC
Nile Garden Elementary School expansion (Manteca Unified School District)	Manteca Unified School District	10/11/2017 Letter to the Department of State Architect 4/25/2017 Letter to MUSD
Tara Park new school site (Manteca Unified School District)	Manteca Unified School District	10/11/2017 Letter to the Department of State Architect 4/25/2017 Letter to MUSD
City of Manteca PFIP (Public Transportation Fee Implementation Plan)	City of Manteca	10/2/2017 Letter to MCC 01/23/2018 Letter to SJCOG