

August 16, 2019

Merced Irrigation District
Attention: Mr. Hicham Eltal
GSP Contact
744 W. 20th St.
Merced, CA 95340
mercedsgma@woodardcurran.com

Dear Mr. Eltal,

I am a landowner in the “White Area” of the Merced Subbasin and have a diversified agricultural operation, including a soil amendment business, beef cattle, and row crop farming. Thank you for the opportunity to provide comments on the Draft Merced Subbasin Groundwater Sustainability Plan (GSP) dated July 19, 2019.

Most of my land is in the southwest corner of the Merced Subbasin, near Grasslands Wildlife Management Area, where Bear Creek and other creeks, sloughs, and other drainages merge with the San Joaquin River. Much of this land floods every year and declining groundwater levels and/or subsidence are not a concern. As such, I believe the Merced Subbasin GSP must create Management Areas.

There are unique groundwater settings throughout the Subbasin, such as a) land subsidence in the El Nido area, b) a cone of depression in the Le Grand area, and c) shallow groundwater in the Stevinson area. These and potentially other concerns, should be managed independently since each is susceptible to unique Undesirable Results and require different management actions. For example, land subsidence is best avoided by reducing pumping below the Corcoran Clay layer. As such, the El Nido area should be managed to encourage recharge and withdrawal from of the upper aquifer and avoidance of deep aquifer pumping. This situation is unique to the El Nido area and it should be managed accordingly. Because of this situation, draft GSPs recently released in adjacent subbasins have created Management Areas with unique Sustainability Management Criteria.

The Draft GSP describes a potential groundwater allocation system where the “sustainable yield” is allocated to landowners. I want to emphasize that *non-irrigated* land receive the same

allocation as currently *irrigated* farmland. Owners of non-irrigated land did not create the overdraft situation and their land values shouldn't suffer as a consequence.

The Merced Subbasin is in overdraft by approximately 150,000 AF/Y with the SGMA expectation that the Subbasin will reach sustainability by 2040. As such, any sort of demand management program should recognize the need to slowly transition from overdraft to sustainability during the 20-year implementation period. Hard and fast pumping restrictions would unnecessarily devastate the local economy by not allowing farmers to thoughtfully adjust their practices.

I plan to continue to stay engaged during the preparation of the GSP so please contact me if you would like clarification of my comments.

Sincerely,

A handwritten signature in blue ink that reads "Billy Grissom". The signature is written in a cursive style with a large, prominent "B" and "G".

Billy Grissom

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Hilmar, CA 95324

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