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VIA E-MAIL

August 15, 2019

Hicham Eltal  
Merced GSP Contact  
Merced Irrigation District  
744 W. 20th Street  
Merced, California 95340  
c/o [mercedsgma@woodardcurran.com](mailto:mercedsgma@woodardcurran.com)

Dear Mr. Eltal:

The California Poultry Federation (“CPF”) is pleased to submit these comments on the draft Merced Groundwater Subbasin Groundwater Sustainability Plan (hereinafter the “Draft GSP”). CPF represents all parts of the poultry industry, including growers, hatchers, breeders, and processors working with chickens, turkeys, ducks, and game birds. For all those segments, water is essential for nutrition as well as maintaining safe and sanitary conditions. CPF therefore encourages effective measures to assure reliable water supplies.

In this regard, CPF supports the emphasis in the Draft GSP on augmenting yield and increasing recharge. Such measures are essential for avoiding the undesirable result of groundwater elevations being too low to satisfy beneficial uses. We believe the Merced Subbasin’s Groundwater Sustainability Agencies (“GSAs”) must continue identifying and implementing additional measures to increase water supplies.

We appreciate the burden to GSAs of developing sustainability plans that address the many requirements of the Sustainable Groundwater Management Act. But at the same time, CPF is concerned about those facets of the Draft GSP that have been deferred to a later date. These include the allocation among the GSAs and plans for any specific demand reduction measure to be taken. The Draft GSP does not assess the pros and cons of the various alternatives under consideration for these important additions. It is critical for the GSAs to do so, giving particular attention to the likely success of measures to increase water supplies as well as the costs that demand reduction measures would impose on all beneficial users and surrounding communities. Particularly concerning is the Draft GSP text (at 6-6) that “[t]he development of the demand reduction program *may* include outreach and feedback from stakeholders and MSGSA member agencies.” Public participation is indispensable to the GSP process, and the public must be given adequate time to review and submit written comments on any proposed demand reduction measures. CPF looks forward to those opportunities.

CPF appreciates your consideration of these comments. Please contact me if you need any additional information.

Very truly yours,

A handwritten signature in black ink that reads "Bill Mattos".

Bill Mattos  
President

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