

GRIFFITH & MASUDA

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Founded 1920

*Celebrating Our
99th Anniversary*

August 19, 2019

VIA ELECTRONIC MAIL

Mr. Bob Kelley, Chair
Merced Subbasin GSA
2222 M. Street
Merced, CA 95341
mercedsgma@woodardcurran.com

Re: July 2019 Draft Merced Groundwater Subbasin Groundwater Sustainability Plan

Dear Mr. Kelley:

On behalf of the Merquin County Water District ("MCWD") please find the below comments with regards to the July 2019 Draft Merced Groundwater Subbasin Groundwater Sustainability Plan ("GSP").

1. Table 6-2 fails to include MCWD as an importer of Merced River surface water. MCWD has a contractual right through Stevinson Water District of 14,211AFY. This conflicts with Woodard & Curran's Technical Memo dated April 8, 2019 wherein MCWD is identified as an importer of surface water.

Moreover, MCWD has several miles of unlined canals and estimates it is responsible for approximately 4000-5000AFY of developed water.

2. As will be addressed during the allocation period, the Stevinson area in which MCWD is located is hydrologically different from the rest of the Merced Subbasin. Given the confluence of the Merced and San Joaquin Rivers in this area, groundwater levels in this portion of the Merced Subbasin have traditionally higher than other areas in the Subbasin.

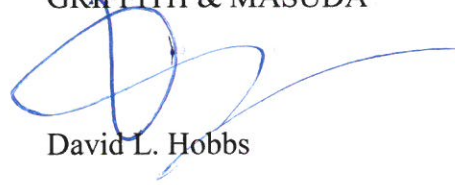
In fact, MCWD was initially formed as a drainage district in order to reduce groundwater elevations. It is hopeful that some consideration be given as to forming a management area for this territory during the implementation period.

Thank you for the opportunity to comment on the GSP. Should you have any questions on these items please feel free to contact me.

Mr. Bob Kelley
August 19, 2019
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Regards,

GRIFFITH & MASUDA

A handwritten signature in blue ink, appearing to read 'D. Hobbs', with a long horizontal flourish extending to the right.

David L. Hobbs

Cc: client.