SAN JOAQUIN RIVER EXCHANGE CONTRACTORS GROUNDWATER SUSTAINABILITY AGENCY

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August 16, 2019

Mr. Hicham Eltal
Merced Subbasin GSP
Merced Irrigation District
744 W 20th Street
Merced, CA 95340

RE: ***Comments on the Draft Merced Subbasin Groundwater Sustainability Plan***

Dear Mr. Eltal:

The San Joaquin River Exchange Contractors Groundwater Sustainability Agency (SJREC GSA) participated in a joint workshop between the Delta-Mendota Subbasin and the Merced Subbasin. The purpose of the meeting was to review groundwater conditions along the adjoining basin boundary and evaluate the draft proposed Sustainable Management Criteria and the potential impacts to the adjacent subbasin.

During this workshop, the Merced Subbasin presented an executive summary of the proposed SMC. The proposed SMC has the potential to directly impact the ability of the Delta-Mendota Subbasin to achieve its sustainability goal. We raised concerns in this meeting about the potential impacts to the SJREC GSA and the Delta-Mendota Subbasin. This letter serves as a formal response to the issues raised during the workshop. The following is a summary of the areas of concern.

1. The proposed SMC for land subsidence is unacceptable to the SJREC GSA. The land subsidence Minimum Threshold (MT) is defined as -0.75 ft/year. An Undesirable Result (UR) is defined as exceeding a MT at 3 or more representative sites for 2 consecutive years. The representative sites were presented during the workshop and located proximal to the Delta-Mendota Subbasin in a known area of significant inelastic land subsidence. Land subsidence in this area has proven to reduce the ability to convey flood flows through the area and also reducing the capacity of irrigation delivery facilities.
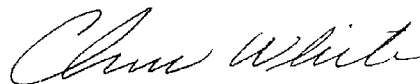
2. An UR for groundwater levels is defined as "greater than 25% of representative wells fall below MT in 2 consecutive wet, above normal, or below normal years." Chronic lowering of groundwater levels is most likely to occur during dry periods. Additional information would be helpful on why the Merced Subbasin has decided to ignore groundwater level during dry and critically dry water year types.

3. The Merced Subbasin has determined that a change in groundwater storage is "not present and not expected to occur in the subbasin due to the significant volumes of freshwater in storage". We anticipate that managing groundwater levels and groundwater storage in the upper aquifer (above the Corcoran clay) would follow similar procedures where a significant and unreasonable change in groundwater storage would not occur so long as water levels are managed appropriately. Additional information on how water levels will remain at/above historic levels is requested particularly in regard to our comment #2 above. Additionally, any land subsidence in the area will directly reduce the groundwater storage in the lower aquifer (below the Corcoran Clay) and should be monitored and managed accordingly. If there is predicted loss of storage due to subsidence, additional information is necessary to define whether or not that loss is significant and unreasonable. The SJREC GSA does not agree that depletion of groundwater storage will not occur solely because there is "significant volumes of freshwater in storage".

4. During the workshop the SJREC GSA provided the Merced Subbasin with lateral groundwater flows for both the upper and lower aquifers. We request the lateral groundwater flow information used in the historical/current/projected water budgets.

This letter serves as a continuation of the regional coordination the SJREC GSA has pursued with neighboring subbasins and GSP's adjacent to the Delta-Mendota Subbasin. Please feel free to contact us with any questions or concerns you have so we can collectively and collaboratively manage our groundwater sustainability in the future.

Yours truly,

Chris White,
Executive Director