



# Sandy Mush Mutual Water Co.

P.O. Box 1232 · Merced, CA 95341  
209.723.3001

August 19, 2019

Merced Irrigation District  
Attention: Mr. Hicham Eltal  
GSP Contact  
744 W. 20<sup>th</sup> St.  
Merced, CA 95340  
[mercedsgma@woodardcurran.com](mailto:mercedsgma@woodardcurran.com)

Dear Mr. Eltal,

Thank you for the opportunity to provide comments on the Draft Merced Subbasin Groundwater Sustainability Plan (GSP) dated July 19, 2019. As a Representative Agency within the Merced Subbasin Groundwater Sustainability Agency (MSGSA), as well as active participants in the Stakeholder Advisory and Coordinating Committees, we appreciate the hard work the various Board members, staff, consultants, and the general public have put into this document.

Our comments are limited at this time and we anticipate a more detailed review of the GSP during the upcoming Public Comment period provided by Department of Water Resources (DWR). We would appreciate the opportunity to meet with you and the GSP consultant team to discuss the GSP.

The GSP states that the Merced Subbasin is in overdraft by approximately 150,000 AFY. In order to preserve our regions' economy, the agricultural community must fully utilize all available surface water for both direct irrigation and groundwater recharge. Merced Irrigation District (MID) has out-of-district surface water available in most years and there needs to be an incentive for both MID and Merced Subbasin out-of-district growers to purchase this water. Sandy Mush Mutual Water Company (SMMWC) is committed to entering into a long-term transfer agreement to purchase this water, even in the shoulder season, and will build the necessary infrastructure to convey it.

We have been participating in the Stakeholder Committee for many months and had become comfortable with the project list in previous iterations of Chapter 6. We were surprised that the El Nido Improvement Canal project was removed. The El Nido Canal is the main artery to bring MID water to the El Nido area, where subsidence is a very real concern. Although MID owns and operates the El Nido Canal, they did not cause the subsidence, and should not necessarily have to pay for the needed improvements. The El Nido Canal Improvement Project should be re-instated into the GSP and the Merced Subbasin GSA should cost-share with MID on improvements to increase the peak capacity downstream of Mariposa Creek.



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There are many Demand Management programs described in the GSP, including groundwater allocations, water market, metering, and fallowing programs. These types of programs will have long lasting impacts on our members, as well as our community. We encourage the GSAs to conduct a thorough hydrogeological AND economic evaluation of all demand management programs considered. It is imperative that SMMWC and the public be informed of all future discussions regarding demand management in the Merced Subbasin.

SMMWC has begun establishing an internal demand management program and would like to have the opportunity to opt-out of any demand management program established by the GSAs.

Thank you for the opportunity to participate in the GSP process and provide these comments. As stated above, we would appreciate the opportunity to meet at your earliest convenience.

Sincerely,

Simon Vander Woude  
President