



August 19, 2019

Mr. Hicham Eltal
Merced CSP Contact
Merced Irrigation District
744 W 20th Street
Merced, CA 95340

RE: Groundwater Sustainability Plan

Dear Sirs:

As a landowner located just west of your Merced Sub Basin GSA, along the San Joaquin River, we strongly object to your Sustainable Management criteria for land subsidence of a minimum threshold of minus 0.75 feet per year. It is ludicrous to state, as your GSP does, that “.....while land subsidence has been recognized by the GSA’s as an area of concern, it is not considered to have caused a significant and unreasonable reduction in the viability of the use of infrastructure.” The subsidence we have experienced in our area over the past 10 years has accelerated at an ever-increasing rate over what we experienced in the prior 100 years. The capacity of the Eastside Bypass as well as the capacity of the San Joaquin River has been reduced by over 40%, which will result in flooding of our properties in high runoff years. The capacity of our irrigation canals has been greatly reduced as well. There can be no question that the infrastructure has been adversely affected.

The solution your GSP proposes: “ongoing monitoring and management in the Merced Sub Basin”, is not a solution. The only solution is to immediately reduce pumping below the Corcoran Clay to a sustainable level, which we estimate to be no more than 0.15 acre feet per acre.

Sincerely,

James L. Nickel
President