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*Via electronic mail:*

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Hicham Eltal, Merced GSP Contact  
Merced Irrigation District  
744 W 20th Street  
Merced, CA 95340

**Re: Draft Merced Subbasin Groundwater Sustainability Plan**

Dear Mr. Eltal:

This office represents the Valley Land Alliance (“VLA”) with respect to the above-referenced Draft Groundwater Sustainability Plan (“GSP”). We appreciate the opportunity to comment on the GSP at this stage of its development.

While the critical steps of developing allocation procedures and determining initial allocations will occur next year, there are aspects of the Draft GSP that should be emphasized and clarified at this stage.

The replacement of sub-Corcoran wells must be prioritized. The Draft GSP understates the severity and importance of land subsidence in the subbasin. It is noted as an “area of concern” but this is a rather tepid description of a grave, ongoing problem. One of the stated purposes of the GSP is to prevent “significant and unreasonable land subsidence,” and yet the GSP does not include a robust analysis of this issue. VLA encourages a clearer and more aggressive approach to reducing land subsidence within the subbasin area.

The GSP planning process must also continue to take into account the evolving science and information regarding climate change. Development of the GSP will necessarily occur over a period of many years, and the rapid development of climate change science will inform the GSP in a dynamic way.

We anticipate that the GSP will include, among other things, the following: identification of optimum locations for effective recharge projects; limits on the reach of


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the GSP into only areas and activities that impact groundwater; and a continued focus on projects and management actions that will either increase surface water supplies to augment the sustainable groundwater yield or will increase groundwater recharge.

We also encourage vigilant resistance to any approach that results in the unreasonable or unfair allocation of water based upon the relative power of the water users involved. The hard lessons learned in California regarding "moving" water from one area to another without deep analysis of the potential consequences should not be forgotten.

VLA looks forward to continued participation in the process, and to providing input as the GSP is developed. Thank you for considering our comments.

Very truly yours,

  
Marsha A. Burch  
Attorney

cc: Valley Land Alliance