

23 Jan 2013

Bill Nicholson
Planning and Community Development

Re: Draft EIR for Merced County GPU – **Water Element**

A central tenet to the water element should be the problem of groundwater overdraft in certain areas of the county. Ag water conservation efforts are advisable in most cases because of their obvious benefits of saving both water and energy. In areas where ground water overdraft is a problem, and agricultural irrigation may help the situation, then tradition flood irrigation might want to be encouraged.

Groundwater overdraft must also include close cooperation of the cities, large industrial users, large agricultural operations and the County to reverse the overdraft condition. This may involve conjunctive use agreements, cities building groundwater recharge sites, and limiting some urban development if non-renewable water sources cannot be secured. Since there are very few areas in the county that are ideal for groundwater recharge, these sites should be identified and protected from urban uses until it is determined that they will never be needed.

Any and all surface water supplies will be needed for future agricultural, industrial and urban uses. The permanent or long-term transfer or sale of water rights or allocations outside the County should be prohibited to the degree that the County has that authority.

For more than 30 years, Arizona has required cities & developers to have a 100-year supply of water from renewable sources before projects and proceed. This strict requirement goes a long way towards addressing groundwater issues.

I agree with almost all the other policies in the draft document.

Maxwell Norton, Farm Advisor
