



August 13, 2015

Dane Mathis
Department of Water Resources
Division of Integrated Regional Water Management
South Central Region Office
3374 E Shields Ave
Fresno, CA 93726

Subject: DWR Proposal to List the Delta Mendota Subbasin as Critically Overdrafted

Dear Mr. Mathis,

Based on your notification email to Bob Martin, of my staff, on July 27, 2015, the Department of Water Resources (DWR) is proposing to add the Delta-Mendota Subbasin to the Critically Overdrafted Basin (COB) list due to the known land subsidence East of Los Banos. The San Luis & Delta-Mendota Water Authority (SLDMWA) and our Participating Agencies within the Delta Mendota subbasin have significant concerns regarding this proposed listing.

The area of subsidence east of Los Banos that you referenced in your email to Bob appears to be the area often referred to as the Red Top (or El Nido) area. (See attached figure). **NOTE: This figure was taken from the Land Subsidence from Groundwater Use in California, APRIL 2014, REPORT OF FINDINGS prepared by LSCE, BORCHERS AND CARPENTER and California Water Foundation.**

The eastern boundary of the Delta Mendota subbasin is the San Joaquin River (drawn in red on attached figure). As identified in the figure, the center and the majority of the subsidence area exists east of the San Joaquin River. It is widely understood that the cause of the subsidence is due to the groundwater pumping and overdraft occurring outside of the Delta Mendota subbasin.

The San Luis & Delta-Mendota Water Authority (SLDMWA) and our Participating Agencies believes that the proposed designation is inappropriate. The Delta Mendota subbasin should not be penalized for conditions that have occurred outside of its boundaries and outside of the jurisdiction of the Delta-Mendota subbasin agencies. We request that the Delta Mendota Subbasin be removed from the recommended list of Critically Overdrafted Basin's being presented to the California Water Commission on August 19, 2015.

We would be happy to meet and discuss further. If you should have any questions, feel free to give me a call at (209) 832-6200.

Sincerely,

Frances Mizuno
Assistant Executive Director

Enclosure

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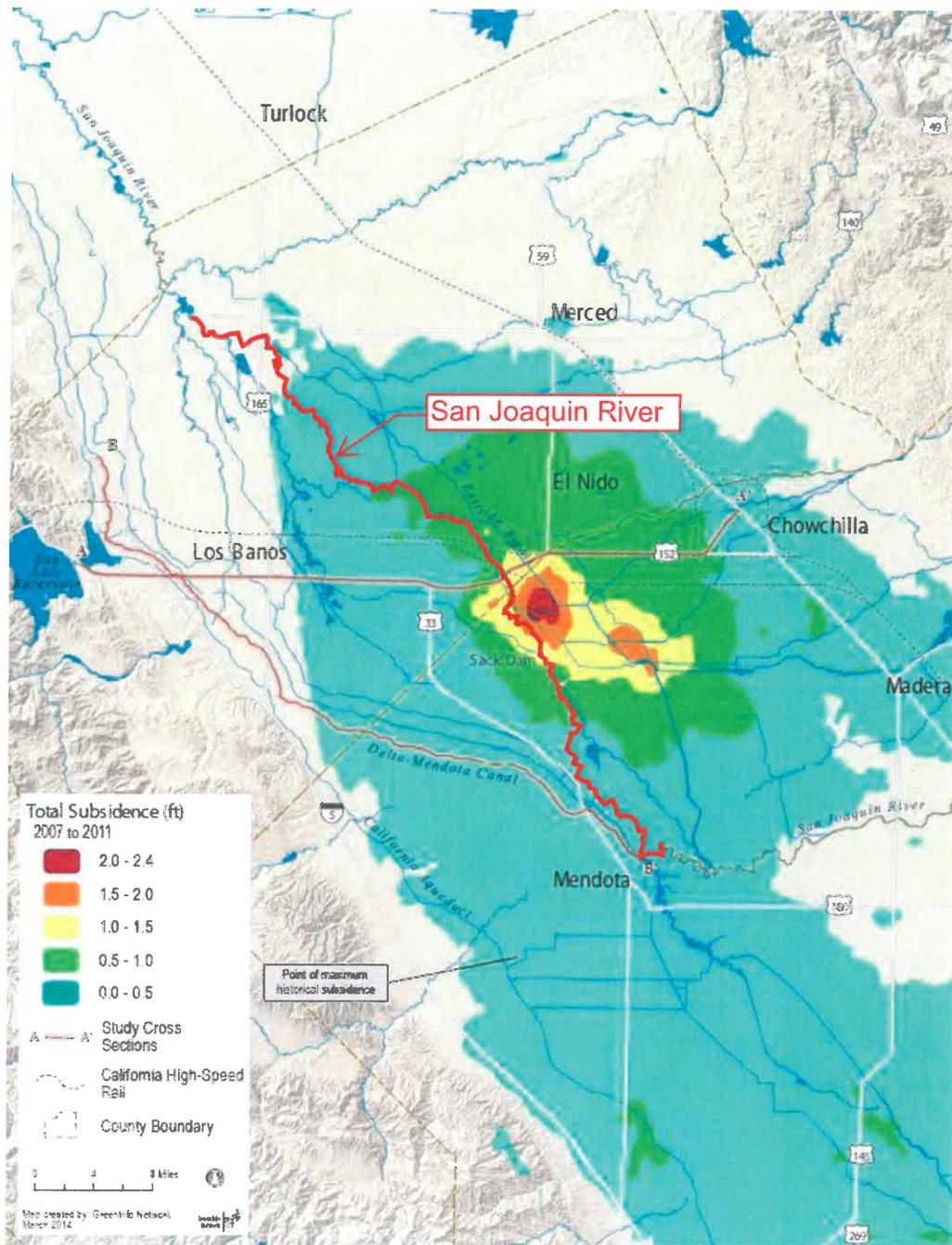


Figure 5. A) Recent subsidence in the central San Joaquin Valley near El Nido between January 2007 and March 2011. Cross sections A-A' and B-B' are shown in Figures 5B and 5C, respectively. (InSAR derived subsidence data were provided as preliminary unpublished data courtesy of NASA-JPL).