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**Sent:** Tuesday, March 18, 2025 5:00 PM
**To:** strgba@mid.org
**Cc:** John Duarte <john@duartenursery.com>; Alexandra Duarte <Alexandra@duartenursery.com>
**Subject:** Comments - Groundwater Sustainability Plan 2024 Annual Report



To: STRGBA

Re: Comments on Groundwater Sustainability Plan 2024 Annual Report

The Modesto Sub basin GRP is an important effort to sustainably grow our local economy while reaching sustainability of our groundwater resources. Stanislaus County and the City of Modesto are in an enviable position in contrast to many farm communities. Locally, we enjoy significant surface water resources, an abundant groundwater aquifer, and significant infrastructure assets to build from. We enjoy these features due to many sacrifices and significant foresight from our forbearers. We collectively owe both this legacy and future generations our best efforts to address all opportunities to solve our groundwater sustainability issues.

The STRGBA is an important and timely effort for our community to plan for sustainable groundwater. We offer the comments below:

1. The current presentation uses the Paulsell 1 OID-11 well to represent the Non-District East area. The hydrograph shows a dramatic decline of the aquifer. This well is, in fact, utilized by OID to supply in district customers who are eligible for surface water deliveries. It is one of two Paulsell wells that are the two largest and deepest well in the basin. The two wells are close in proximity and are operated continuously through the agricultural irrigation season. Using Paulsell 1 hydrology as a single example of the East side aquifer is simply too narrow an analysis. Also, the pumping demand placed on these two wells will soon be supplanted by ongoing improvements to the Paulsell canal which

will increase its capacity. This project will replace the use of groundwater with surface water for both in district OID customers and for out of district contracts in normal to wet years. This change needs to be carefully modeled and presented as a project.

2. Modesto Irrigation district currently pumps a current 10-year average of approximately 20K acre feet for in district agricultural usage. This is down from a previous 10-year average of 30k acre feet. Both timespans include a multiyear drought. MID has opportunities within its boundaries to increase surface water use. We encourage the district to set specific goals and strategies to further reduce in district surface water use. These efforts should be quantified and modeled as a project. Substantial groundwater use in droughts will necessarily continue.

3. OID has significantly reduced its in district pumping of groundwater. The Paulsell project above will greatly eliminate the balance. There is still significant in district agricultural usage of groundwater from private wells. The district should quantify this pumping and set goals to reduce both district and private groundwater pumping where surface water deliveries are available.

4. Modesto City and MID own and operate a surface water treatment plant with a capacity of 60M GPD. Current maximum annual use is about 50% of capacity. Modesto urban water use continues to include 20K acre feet of groundwater. Modesto should identify constraints to increased surface water displacement of groundwater and set forth a plan to implement necessary capital and operational changes as a project. Water quality standards are increasingly stringent. Future heavy reliance on groundwater use is unlikely. Each neighborhood in the city should have equitable access to safe treated surface water.

5. Recently, the Turlock ID water treatment plant has begun delivering water to Turlock, Ceres, Hughson, and Denair. The Modesto water treatment facility has both the capacity and proximity to economically serve Waterford, Oakdale, and Riverbank. Connecting these cities to the excess capacity of the Modesto water treatment facility is an imperative for groundwater sustainability. Municipal leaders need to come together on workable terms for all parties. Excess capacity, stringent water quality standards, and looming extraction fees should motivate leaders towards workable compromises. This should be a specific and major goal of our groundwater sustainability effort.

6. Although the best solutions towards groundwater sustainability are to avoid pumping where surface water can be used, recharge is an important and significant opportunity. Modesto Irrigation District already actively charges the Dry Creek drainage

with captured surface water at several locations. This needs to be quantified, expanded as possible, and presented as a project. Another existing resource for recharge is the long-abandoned Waterford Bypass canal. This empty stretch of dirt bottomed canal is connected to the MID main canal east of Waterford. In normal to we years this asset should be employed as a recharge basin. This opportunity should be developed, quantified and listed as a project.

Thank you,

John & Alexandra Duarte

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