



December 1, 2020

Stanislaus and Tuolumne Rivers  
Groundwater Basin Association  
1231 11<sup>th</sup> Street  
Modesto, CA 95354  
[strgba@mid.org](mailto:strgba@mid.org)

Re: STRGBA Groundwater Sustainability Plan

Dear STRGBA Member Agencies:

In advance of the upcoming STRGBA meeting and the presentation of the projected water budgets, I am writing to reiterate some of the comments and questions that came out of the Technical Advisory Committee (TAC) meeting on October 27, 2020.

In particular, I want to repeat the question that I raised with regard to the decision to combine all of the “Non-District Agriculture” (NDA) on both the east and west sides of the basin into one zone. Given the riparian and licensed water users located on the west side, who pump out of both the Tuolumne and Stanislaus Rivers, compared with the east side’s almost complete dependence on groundwater, lumping these two areas into one zone seems ill advised. This may have the effect of not only masking the magnitude of deficit from NDA on the east side, but doing so to the detriment of those that played no role in the creation of that deficit. The groundwater conditions in these two areas vary drastically. The groundwater table in the west side is so high, groundwater is pumped so that the land can be farmed. On the east side, however, the groundwater is found at deeper depths and, for the most part, is the exclusive water source. With all of this in mind, I would again urge further consideration of this issue.

Similarly, I think it would be helpful to see further analysis of the east and west sides within the boundaries of the districts (Modesto Irrigation District and Oakdale Irrigation District). It has been mentioned several times that conditions vary widely within the basin as a whole. This is particularly true on the east and west side within Modesto Irrigation District. It was asked if further analysis of the east and west sides within the district boundaries would be forthcoming and it was not clear if this was going to be done. This analysis is important to further development of the Groundwater Sustainability Plan and I urge you to complete it.

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Thank you for your continued efforts on the Groundwater Sustainability Plan.  
I appreciate your consideration of my comments and questions.

Best regards,

A handwritten signature in black ink that reads "Alexis Stevens". The signature is written in a cursive, flowing style.

Alexis K. Stevens

cc: John Davids, Modesto Irrigation District ([John.Davids@mid.org](mailto:John.Davids@mid.org))  
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AKS:mb