

December 3, 2020

Stanislaus and Tuolumne Rivers Groundwater Basin Association  
1231 11<sup>th</sup> Street  
Modesto, CA 95354

**RE: STRGBA Groundwater Sustainability Plan Development**

Dear Board Members:

As consultant that works with several clients within the Modesto Subbasin, we have been following the development of the Modesto Subbasin's Groundwater Sustainability Plan (GSP). We commend the Board and consultant team on doing excellent work, providing timely updates and encouraging discussions.

The Modesto Subbasin is at a similar point of GSP development as other high priority basins not designated as having critical overdraft conditions located in other areas of the state. While GSPs have been submitted for high priority basins with critical conditions, we have found, through our work with other critical and non-critical subbasins, that some important issues should be addressed early in the GSP development process. Addressing the issues discussed in this letter early in the process allows for consensus among the member agencies to be developed and continued cooperation encouraged as the GSP is finalized. It also improves the likelihood of fair policy development and State acceptance of the GSP.

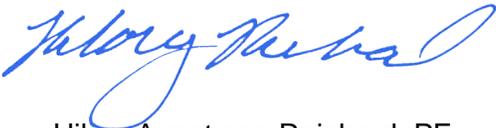
The funding for the Association should be transparent. A reasonable plan should be developed for funding the long-term oversight and administration of the Association and for projects that will be implemented. Sharing the general oversight and administrative costs equally among all regulated lands on a per acre basis is what we have seen elsewhere and think that is fair given that each member agency is required by the State to participate in the Association. On the other hand, where specific projects or actions are required in portions of the Subbasin, the associated costs should be separated and allocated to the relevant areas. Although the preliminary water balances presented for the Subbasin shows the basin is in overdraft as a whole, they also show that some areas are contributing much more to this overdraft than others. To prevent the worsening of undesirable results in those areas, actions will need to be taken. As the agency responsible for SGMA compliance in the Modesto Subbasin, the funding for those actions that are not covered by grants will need to be paid for by STRGBA. How the funding requirement will be distributed among the various areas within STRGBA will need to be discussed. We suggest that at least some general guidelines regarding the methodology for distributing the costs of these actions be discussed early in GSP development, including distribution of costs in proportion to an area's relative impact to undesirable results and accounting for direct contributions made to solve them. Factoring relative contributions prior to 2015 toward both causing and mitigating undesirable results also needs to be discussed such as, changing in ag land use, recharge efforts, flood irrigation, projects to reduce the reliance on groundwater, etc.

Furthermore, the development of something akin to management areas without the State's burdensome regulatory requirements, that do not necessarily follow agency boundaries, and which are based on the findings of the Basin Setting and the modeling and water balance results, should be discussed with the stakeholders. Such areas can help tailor effective management approaches, decrease undesirable results, and help fairly distribute costs in a subbasin such as yours where the depth to groundwater, surface water supplies, hydrogeologic conditions and contributions to groundwater sustainability vary greatly across the subbasin.

The future scenarios that will be examined and modeled by the consultant team should be discussed and reviewed by stakeholders prior to performing the analysis. The stakeholders will provide insight into plans that are currently in development and may make a difference in the analysis. Ensuring that the stakeholders are involved can make the GSP process more efficient and effective and will help avoid challenges by the State and stakeholders.

We appreciate the amount of work involved in forming a new organization, following State guidelines, and engaging stakeholders. We are thankful for the receptiveness to input shown by the STRGBA Board and consultant team and look forward to continued opportunities to provide constructive input toward as the Association's successful development of the GSP.

Respectfully,



Hilary Armstrong Reinhard, PE  
Senior Engineer