

Stanislaus and Tuolumne Rivers Groundwater
Basin Association Groundwater Sustainability
Agency
1231 11th Street
Modesto, CA 95354

June 28, 2024

Comments on the Draft Revised Groundwater Sustainability Plan

To the Board of the Stanislaus and Tuolumne Rivers Groundwater Basin Association
Groundwater Sustainability Agency.

As a Modesto Sub-Basin OID In-District and Out-of-District farmer who recognizes that our region is blessed with several great irrigation districts that we all depend on and I would like to respectfully suggest some amendments to the Modesto Sub-Basin Draft Revised GSP.

1. Historically the District's OID & SSJID reliance on Out-of-Basin water sales may have helped to balance their annual fiscal budgets but have precipitated the overdraft in the Eastern San Joaquin Sub-Basin and the Modesto Sub-Basin over the years. Our great districts should formulate new financial plans that create sustainability within the Modesto Sub-Basin for future generations.
2. The MID-GRP and the OID-10-year programs are a great start towards sustainability in the Modesto Sub-Basin and the districts programs could be much more successful with some water delivery adjustments and additional feasible projects.
 - A. Suggest delivering the MID-GRP, and the OID-10-year programs water through September 30th of each water year as OID & SSJID do with their Out of Basin Water Sales.
 - B. As an alternative to out-of-basin water sales the districts should consider charging their In-District water users 100% of the cost of delivery for the agricultural water that is delivered within the districts.
 - C. As an alternative to out of basin water sales the districts should consider charging their Out of District water users 125% of the cost of delivery for the agricultural water that is delivered out of the district but within the Modesto Sub-Basin.
 - D. The Draft Revised Groundwater Sustainability Plan should account for the ongoing removal of permanent crops and the reduction of groundwater demand due to declining agricultural commodity prices and orchard attrition.
 - E. The Modesto Sub-Basin would be better served if the Stanislaus and Tuolumne Rivers Groundwater Basin Association Groundwater Sustainability Agency focused on more feasible GSP projects for basin sustainability.

Thank you for the opportunity to provide my opinion and comments on these important Modesto Sub-Basin GSP issues.

Louis F. Brichetto



Out of Basin Water Sales over the years per OID-SSJID contracts.

4-12-1999 VAMP - OID SSJID,	110,000 af
7-10-2009- 1-1-2010, SLDMWA - OID SSJID,	45,000 af
4- -2013 DWR SLDMWA - OID SSJID,	80,000 af
9-29-2015 SLDMWA - DWR OID SSJID ,	23,000 af
4-8-2016 SLDMWA - DWR OID SSJID,	75,000 af
4-8-2016 SLDMWA DWR - OID SSJID,	10,000 af
9-26-2016 SLDMWA & DWR - OID SSJID	16,000 af
4-18-2018 SLDMWA DWR - OID SSJID,	100,000 af
3-3-2020 SLDMWA & DWR - OID SSJID	100,000 af
3-2-2021 SLDMWA & DWR - OID SSJID	100,000 af failed Sale
9-8-2022 Chicken Ranch Casino - OID SSJID	1500 af
1-23-2023 Banta-Carbona - OID SSJID,	10,000 af
6-25-2024 SSJID to SDWA	335 af