



August 12, 2025

Via Electronic Mail Only

Stanislaus and Tuolumne Rivers Groundwater Basin Association
1231 Eleventh Street
P.O. Box 4060
Modesto, CA 95354
strgba@mid.org

Re: STRGBA Allocation Framework and Fees

Dear STRGBA Member Agencies:

The California Cattlemen's Foundation (CCF), California Cattlemen's Association (CCA), San Joaquin/Stanislaus Cattlemen's Association, and Tuolumne County Cattlemen's Association recently became aware that the Stanislaus and Tuolumne Rivers Groundwater Basin Association's (STRGBA) is considering various management actions in the Modesto Subbasin that may affect non-irrigated rangeland. Because ranchers operating on non-irrigated rangeland generally do not use groundwater, they often do not engage on Sustainable Groundwater Management Act-related issues. As the STRGBA implements SGMA, we would like to provide information specific to rangeland that is important for the STRGBA to consider.

CCF is a 501(c)(3) California Nonprofit Public Benefit Corporation representing all cattle ranchers and beef producers throughout California. CCF's purpose is to support and engage in educational, legal, charitable, and research activities related to cattle ranching in California. CCA is a statewide trade association representing more than 1,700 cattle ranchers and beef producers throughout California with the purpose of nourishing people, caring for livestock, and sustaining the environment for all Californians. The San Joaquin/Stanislaus and Tuolumne County cattlemen's associations are affiliate organizations of CCA representing cattle producers – including those residing within the Modesto Subbasin and the Non-District East area of the Subbasin – on matters of local importance. The ranchers represented by our organizations pride themselves upon the responsible stewardship of the state's land, water, and wildlife resources.

1. Conduct direct outreach to owners/operators of non-irrigated rangeland.

Many owners and operators of non-irrigated rangeland do not follow SGMA implementation because they do not use significant amounts of groundwater. Because there are so many other issues cattle producers grapple with every day, most ignore SGMA because they do not irrigate. This means that when Groundwater Sustainability Agencies begin discussing issues that may affect all land within a basin, such as allocations and fees, ranchers are often unaware of these issues.

To ensure that impacted stakeholders are aware of issues that may affect them, we encourage the STRGBA to conduct direct outreach to cattle producers and other owners/operators of non-irrigated rangeland. This outreach may include: a) meeting with local cattlemen's associations to discuss management actions that STRGBA is considering which may impact rangeland, b) including local livestock associations on the list of interested persons, c) directly contacting by mail all landowners within the basin, and d) clearly stating in outreach materials that issues may affect the recipient even if they do not pump groundwater. Our organizations stand ready and willing to assist STRGBA in facilitating this outreach.

2. Ensure any allocation framework protects unexercised overlying groundwater rights and provides for livestock drinking water.

At its July 16, 2025 meeting the STRGBA discussed an Allocation Framework that outlined how the basin's sustainable yield would be allocated among the management areas and presumably groundwater users within those management areas. As this framework is further developed, our organizations request the STRGBA ensure that unexercised overlying groundwater rights are protected and that the minimal amount of water required for livestock drinking water is unaffected.

First, the allocation system must protect overlying groundwater rights by ensuring that landowners with unexercised overlying groundwater rights can access their share of the sustainable yield in the future.

Second, the allocation system should not impact groundwater used for livestock drinking water. The amount of water used for livestock drinking water on a per-acre basis is so minimal that there is no measurable effect on the groundwater budget. In a typical seasonal grazing operation, cow-calf pairs would consume an estimated 0.004 acre-feet/acre (~1.2 mm/acre) of water. While this amount is far less than the margin of error for the groundwater model and any available measurement system, this drinking water is critical to animal health and important to supporting rangeland remaining as undeveloped open space.

3. Carefully consider non-irrigated rangeland's specific burdens and benefits regarding SGMA implementation when developing fees.

While the early phases of SGMA implementation were generally funded through state grants, many GSAs will eventually be required to impose fees to support ongoing SGMA implementation. In some areas, GSAs have taken the approach that all land within the subbasin benefits from the local agency serving as the GSA and consequently it is proper to charge all land a SGMA fee. We strongly encourage the STRGBA to avoid this overly simplistic approach.

Should the STRGBA or any of its member agencies be in a position of considering fees to fund SGMA implementation, we encourage the agency to consider the relative burdens and benefits of different land uses on SGMA implementation. As explained above, even if livestock were entirely reliant on drinking groundwater for the grazing season – our understanding is that most rely on stockponds and other surface water sources – the amount of water consumed on a per-acre basis is too small to measure. Put another way, an orchard using 42 inches of groundwater would use nearly 1,000 times more water per acre than cattle grazing non-irrigated rangeland.

We encourage the STRGBA and its member agencies to ensure that any fee developed fairly apportions the relative benefits and burdens of non-irrigated rangeland compared to other land uses in the subbasin. Non-irrigated rangelands provide natural recharge areas with minimal groundwater demand that are essential to long term sustainable groundwater management. A defensible and equitable fee will recognize these benefits to the basin as well as the fact such land uses impose no burden on the GSA.

Conclusion

The California Cattlemen's Foundation, California Cattlemen's Association, San Joaquin/Stanslaus Cattlemen's Association, and Tuolumne County Cattlemen's Association appreciate the opportunity to provide these comments for the STRGBA's consideration. If we can help STRGBA or its member agencies on any of the issues raised in this letter, please reach out to billy@calcattlemen.org or kirk@calcattlemen.org.

Sincerely,

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