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May 7, 2025

STRGBA GSA Members

Members,

I have studied your annual reports and attended several meetings. I have a few items to address.

First, your 2024 annual report states the Non- District East is pumping 65,400 AF per year on average more than they should. Oakdale Irrigation District offered a significant number of ND East properties water from OID. Only a few ND East farmers entered into the agreement with OID and currently almost all of those that entered the agreement purchase the minimum required by the contract. The 2024 annual report states the ND East needs to cut their pumping in half. MID and OID have a significant portion of the 65,400 AF needed to reduce the overdraft and have made it available to the ND East. The ND East farmers have the ability to purchase water from OID and MID. This would help fix the overdraft condition they created. Since the ND East farmers are not buying the surface water that the districts have made available, apparently the GSA needs to take action to force them to fix the overdraft conditions they have created in the ND East.

Depending on the year, OID and MID as a combined group are recharging the Subbasin. The problem is the over drafted Subbasin is only in the ND East. That is clear from both measured water levels and the groundwater model results.

Everyone makes conscious business decisions. The ND East landowners chose to buy cheap non-district land that is not in any irrigation district and that rely solely on deep wells for their water source. Buying the ND East properties may have been a good choice at the time and may still be a good decision. However, now that SGMA is in effect, and it is clear that the overdraft in the Subbasin is in the ND East, the GSA must require the ND East to either purchase at least  $\frac{1}{2}$  of their total water needs from the OID and MID surface water supply, or they need to stop farming  $\frac{1}{2}$  of their property. Even though OID and MID surface water will cost more than pumping groundwater, that is a cost that must be paid if the ND East wants to keep farming. My interest rates have recently doubled on my loans on my properties in OID. When I bought my properties in OID, I paid more than double the purchase price for these properties compared to those that are not in OID because of the surface water availability. Today's high interest costs are costing me around \$700 per acre per year. Additionally, I have to pay OID to purchase water as well. Even if the ND East purchases water from OID or MID for \$200 per acre foot, the landowners will still be paying less overall than my water costs for owning property in district today. The ND East landowners are fortunate they have surface water being offered by OID and MID. The landowners in OID and MID and urban water users can't be forced to pay for the over pumping that is happening in the ND East. We have all made our business decisions and we all have our own bills. The OID and MID landowners cannot be forced to pay to fix the ND East overdraft.

Attached are pages from your 2024 annual report that show the ND East Operation Budget

1- ND East- Negative net recharge-shows trend leading to the current amount of 65,400 AF negative.

2-ND East- Ground water level trends- Eastern sub basin still characterized by decline and reached levels below minimum threshold.

3- Eastern Principal Aquifer. Shows 11 wells below minimum threshold. All of these wells are affected by over pumping in the ND East.

I have a few comments for future implementation of the monitoring of lands and water application:

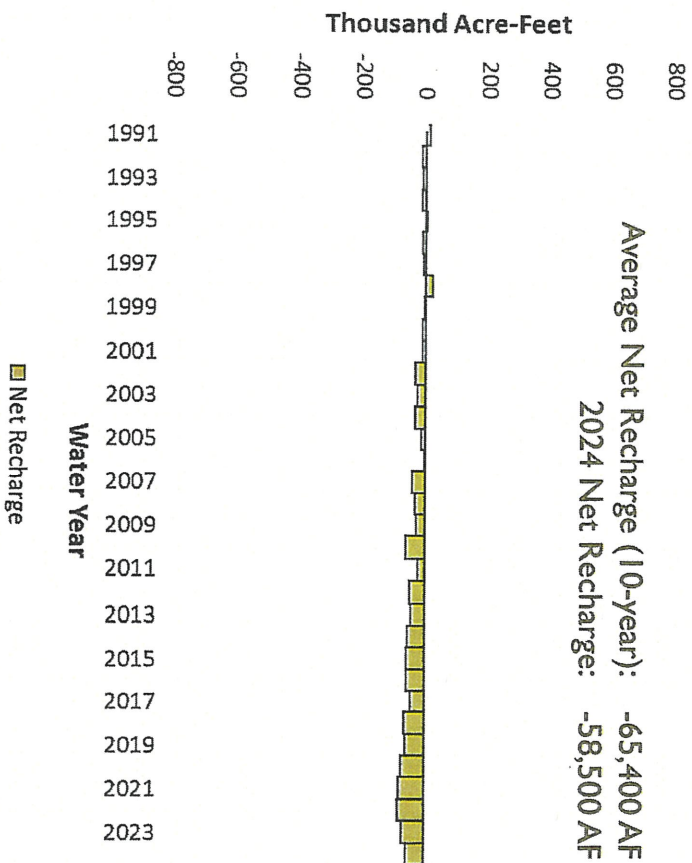
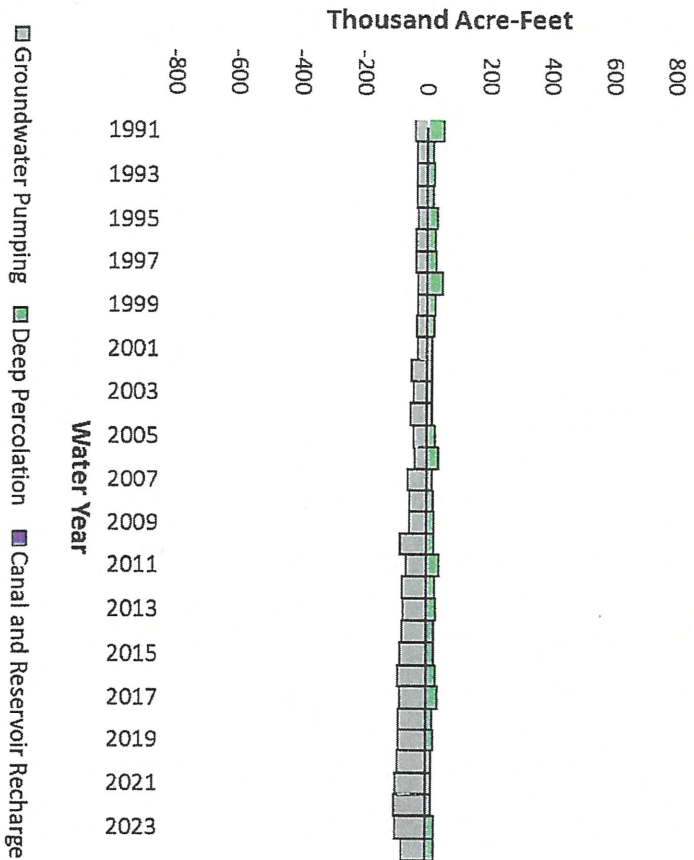
- A- Keep it simple. Don't make an overburdening, expensive huge bureaucracy.
- B- Those parcels in the management areas that aren't in overdraft should not be required to report, nor install meters, pay fees, nor comply with any other burdensome and expensive requirements.
- C- Those "dry land" parcels - non irrigated parcels – should also be exempt.
- D- Only those parcels that pump in the management area that is in over-draft should have to comply with the requirements to report pumping and groundwater use, install meters, pay extraction and other fees, etc. as determined by the STRGBA.
- E- Continue to use the management areas that have already been defined by the experts in our Subbasin and consider their different groundwater situations when deciding what is required. This will reduce the scope of the agency's concern so the GSA only manages the problem area (ND East) rather than burdening everyone in the Subbasin.

In closing, it is the Stanislaus County Board of Supervisors and staff's responsibility to represent the entire County, not just the ND East. The ND East needs to reduce its pumping or buy water from MID and OID to stop the overdraft. The ND East pumps 65,400 AF too much which at approximately 3 ½ AF per acre for almond production calculates basically to 18,700 total acres that need to stop pumping from the underground one way or another. Placing monetary burden on those that are not overdrafting the Subbasin will be met with great resistance, would be wrong, and will not be tolerated.



John P. Brichetto

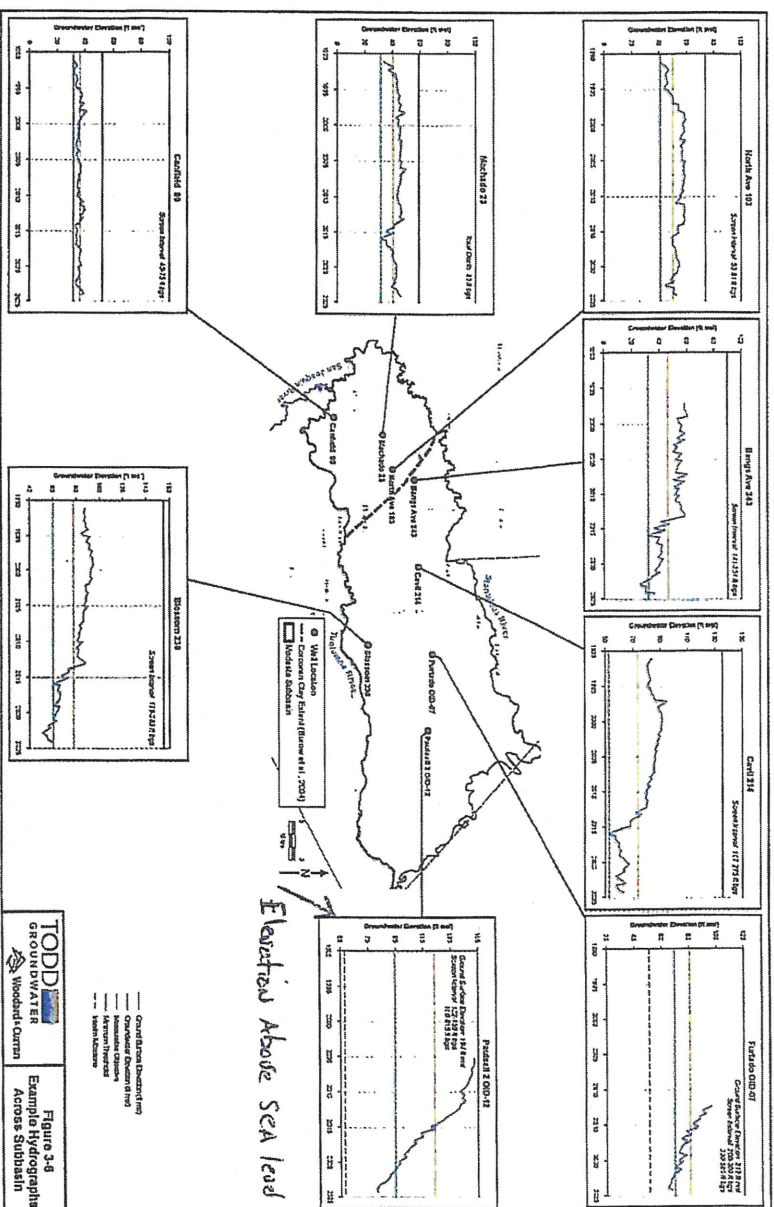
# NON-DISTRICT EAST: OPERATIONAL BUDGET



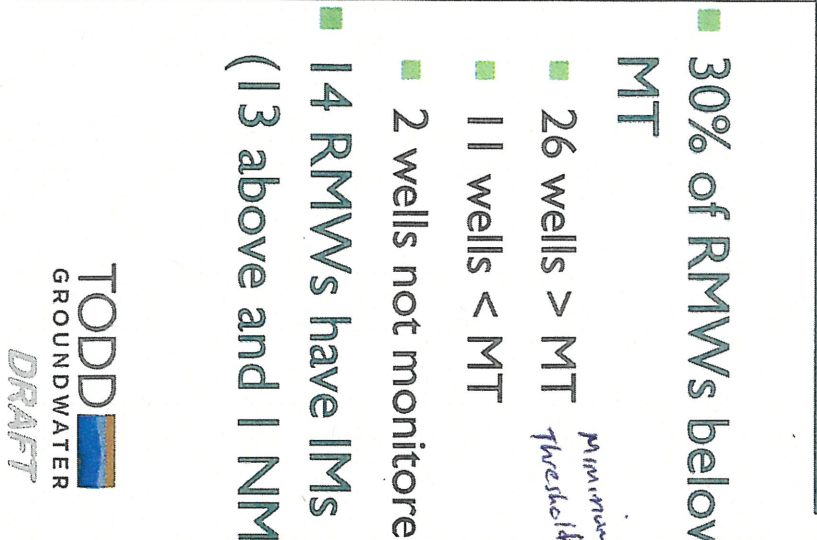


# GROUNDWATER LEVEL TRENDS

Small recovery in many wells in WY2024  
Eastern Subbasin still characterized by decline and levels below MTs







30% of RMVs below  
MT

26 wells > MT  
minimum  
threshold

|| wells < MT

2 wells not monitored

# 14 RMV's have IMs

(13 above and 1 NM