

**From:** Margaret Caligaris <mcagalis@trihydro.com>  
**Sent:** Wednesday, August 13, 2025 9:30 AM  
**To:** Stanislaus and Tuolumne Rivers Groundwater Basin Association  
**Cc:** Eric Thornburn; Christy Mckinnon  
**Subject:** Modesto Management Actions - Allocation Framework Comments for Consideration [July 16, 2025 Public Workshop]

Members of the Stanislaus and Tuolumne Rivers Groundwater Basin Association (STRGBA) Groundwater Sustainability Agency (GSA),

Trihydro Corporation (Trihydro) appreciates the opportunity to provide comments to STRGBA regarding the proposed management actions (MAs) for the Modesto Subbasin (Subbasin) in response to the July 16, 2025, public workshop. As developed, the allocation framework supports the Subbasin's commitment to achieve sustainability goals outlined in the Groundwater Sustainability Plan (GSP) in the event that implementation of infrastructure or surface water projects are insufficient in meeting those goals.

Following the public workshop, Trihydro hydrogeologists have developed a few items for STRGBA and consultant consideration.

1. **Model Updates:** During the public meeting, representatives of Woodard and Curran (W&C) indicated the intention to update groundwater modeling on an annual basis, to verify that the allocations for each stewardship area are the most accurate year to year. Trihydro recommends that STRGBA and W&C continue to retain the ability to adjust model update timeline if needed.
2. **Legal Exemptions:** During the workshop, these exemptions were identified as tribal lands, federal lands, adjudicated areas, and developed supplies which covers most water use types. Consider adding written clarity regarding these legal exemptions.
3. **Water Loss to Seepage:** Recommend adding clarity regarding the estimated loss to seepage, how does this affect calculations and allocations to different stewardship areas.

Some of these comments were verbally addressed by Dominick and the W&C team but we recommend considering adding more written clarity for those who only have access to the written presentations.

Thank you,  
Margaret

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