



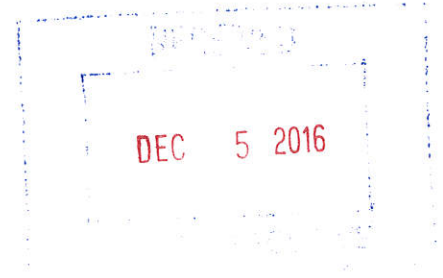
HILLTOP

The Experienced Source for California Almonds

November 28, 2016

Public Comment
2016 Bay-Delta Plan Amendment & SED
Deadline: 3/17/17 12:00 noon

Felicia Marcus, Chair
State Water Resources Control Board
PO Box 100
Sacramento CA 95812-0100



Subject: Comment Letter – 2016 Bay-Delta Plan Amendment & SED

My wife and I founded Hilltop Ranch, Inc. in 1980 and is now one of the largest privately owned processors of almonds, handling about 30,000 tons annually and shipping to buyers in over 70 countries. We have dramatically expanded our operations throughout the years and now employ approximately 250 individuals annually.

Hilltop Ranch, Inc. is very concerned with your Draft Revised Substitute Environmental Document (SED) supporting Phase 1 of the Board's Bay-Delta Water Quality Control Plan. If approved, your proposal requiring the Merced, Tuolumne, and Stanislaus rivers to dedicate 40 percent of unimpaired flow to fish and wildlife would cause irreversible harm to our region.

Beyond devastating our community by demanding 40 percent unimpaired flows from February 1st- June 30th annually, your staff is proposing taking over control of our locally paid for, built and operated Don Pedro Reservoir. Don Pedro was built specifically to allow our community to survive a prolonged drought, similar to the one we are currently in, but the Revised SED now limits the amount of water available to our community.

In addition, the Revised SED dramatically harms the nearly two-year effort by our local water agencies who are diligently working to achieve the state-mandated groundwater sustainability goals outlined in the Sustainable Groundwater Management Act (SGMA). If implemented, the SED will be the direct cause of groundwater reduction in our region, making it nearly impossible to achieve the state-mandated groundwater sustainability.

With the implementation of this measure, Hilltop Ranch would be forced to reduce its workforce due to 20 percent of existing farm land being put out of production. This would significantly impact the lives of the families that we employ, as well as the local economy.

Before your board votes to harm our agricultural economy, our drinking water and community, please work with the local water districts (many of whom have peer-reviewed, most recent science) to look at non-flow measures that can accomplish realistic goals for the environment and the Bay-Delta before considering a flow-centric approach.

Sincerely,

Dave Long, President

cc: Frances Spivy-Weber, Vice Chair
Tam Doduc, Board Member
Steven Moore, Board Member
Dorene D'Adamo, Board Member