



A. L. Gilbert Company

P.O. Box 38 - 304 N. Yosemite
Oakdale, California 95361-0038

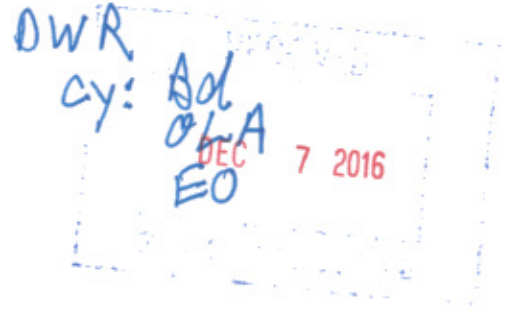
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December 5, 2016

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

Public Comment
2016 Bay-Delta Plan Amendment & SED
Deadline: 1/17/17 12:00 noon



Re: Bay-Delta Water Quality Control Plan Update

Dear Chair Marcus and Members of the Board:

The A. L. Gilbert Company, established in 1892 is a family owned business based in Oakdale that serves agricultural customers, primarily family owned farms in Stanislaus, San Joaquin and Merced counties. These agricultural operations rely heavily on surface water from the Tuolumne, Stanislaus and Merced Rivers.

As an organization, we are very concerned about your Substitute Environmental Document (SED) and its proposed unimpaired flow requirements for the Tuolumne, Stanislaus and Merced Rivers. As you know, the economy of the central valley is largely driven by the agricultural sector. We find it troubling that your plan lacks any proposal to address what you label "significant, but unavoidable impacts" to our region.

Another equally troubling aspect of your SED as currently written, would be its negative impact on groundwater sustainability. Because you assume that maximum groundwater pumping will be used to replace the lost surface water, you must also be aware that this will eliminate the possibility for local agencies to sustainably manage groundwater under the Sustainable Ground Water Management Act (SGMA) without devastating family farms and local economies.

There can be no doubt that as currently written, your plan will deliver devastating economic consequences to our region. While it appears this outcome is of little or no consequence to you and your board, I assure you it is of critical importance to everyone involved in the agriculture sector, whether directly or indirectly.

We urge the SWRCB to abandon this ill-conceived SED and enter into good-faith discussions with all impacted parties with the goal of reaching a negotiated and balanced solution that preserves the agricultural sector and groundwater resources of our region. We also believe that any eventual solution should be based on sound science that has already been developed by our local agencies during their relicensing efforts for both the Exchequer and New Don Pedro dams.

We thank you for your consideration and look forward to your response.

Sincerely yours,

A handwritten signature in blue ink that reads "Robert Gallagher". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Robert Gallagher
Chief Operating Officer
A.L. Gilbert Company

cc: Governor Brown
Senator Anthony Canella
Senator Cathleen Galgiani
Assemblymember Adam Gray
Assemblymember Kristin Olsen