

PRINCIPALS

MAXWELL M. FREEMAN

MICHAEL L. GUREV

THOMAS H. KEELING

ARNOLD J. WOLF

LEE ROY PIERCE, JR.

1818 GRAND CANAL BOULEVARD · STOCKTON · CA 95207

ASSOCIATES

FRANKLIN J. BRUMMETT

MICHAEL N. MORLAN

JOHN W. VISS

June 2, 2016

CWFhearing@waterboards.ca.gov all Via Email

Hearing Chair Tam Doduc

Hearing Officer Felicia Marcus

State Water Resources Control Board

Sacramento, CA

**Re: Request for Extension of time to file and serve Objections in Hearing on California Waterfix Water Rights Change Petition**

Dear Hearing Chair Doduc and Hearing Officer Marcus:

Protestants County of San Joaquin, San Joaquin County Flood Control and Water Conservation District, and Mokelumne River Water and Power Authority respectfully request a 27-day extension of time in the Hearing on the Waterfix Change Petition for the filing and service of written objections concerning the petitioners' case in chief. This request, if granted, would change the current time for receipt of written procedural/evidentiary objections from 12:00 noon, June 15, 2016 to 12:00 noon, July 12, 2016.

By our count, the petitioners' May 31 submissions, including documents that require close study and analysis, exceed 5,200 pages in length. Compounding the challenge for protestants, the petitioners recently updated the modeling related to the proposed project. The Water Board website confirms the large size of the updated modeling files: at least 19.3 GB. Under these circumstances, it is not reasonable or realistic to expect that protestants will have read and evaluated the 5,200+ pages of exhibits and 19.3 GB of modeling analysis by June 15. The current schedule does not allow for a considered and responsible preparation of appropriate objections.

Other considerations raised in extension requests from other protestants – including the Central and South Delta Water Agencies, AquaAlliance, Sierra Club California, Friends of the River, California Sportfishing Protection Alliance, and Restore the Delta – also weigh strongly in favor of an extension of the deadline for submission of objections. We hereby join in their extension requests.

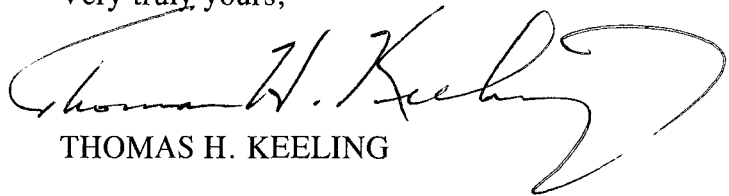
Given the July 26, 2016 Hearing commencement date, the extension we request should assure that objections are filed and served two weeks before the start of the Hearing. That schedule should afford sufficient time to apprise petitioners of the nature of the objections while, at the same time, allowing protestants a reasonable opportunity to evaluate petitioners' May 31 submissions and the updated modeling analysis.

Hearing Chair Tam Doduc  
Hearing Officer Felicia Marcus  
State Water Resources Control Board  
June 2, 2016  
Page 2

---

Thank you for your prompt consideration of our request.

Very truly yours,



THOMAS H. KEELING

cc: All by electronic service

All party representatives on May 27, 2016 State Water Resources Control Board  
(SWRCB) service list

Tom Howard, Executive Director, SWRCB

Michael Lauffer, Chief Counsel, SWRCB

Dana Heinrich, Staff Attorney IV, SWRCB

Diane Riddle, Environmental Program Manager, SWRCB