

1 THOMAS H. KEELING (SBN 114979)
2 FREEMAN FIRM
3 1818 Grand Canal Boulevard, Suite 4
4 Stockton, CA 95207
5 Telephone: (209) 474-1818
6 Facsimile: (209) 474-1245
7 Email: tkeeling@freemanfirm.com

8 J. MARK MYLES (SBN 200823)
9 Office of the County Counsel
10 County of San Joaquin
11 44 N. San Joaquin Street, Suite 679
12 Stockton, CA 95202-2931
13 Telephone: (209) 468-2980
14 Facsimile: (209) 468-0315
15 Email: jmyles@sigov.org

16 Attorneys for Protestants County of San Joaquin,
17 San Joaquin County Flood Control and
18 Water Conservation District, and
19 Mokelumne River Water and Power Authority

20 [ADDITIONAL COUNSEL LISTED ON FOLLOWING PAGE]

21 **BEFORE THE**
22 **CALIFORNIA STATE WATER RESOURCES CONTROL BOARD**

23 HEARING IN THE MATTER OF
24 CALIFORNIA DEPARTMENT OF WATER
25 RESOURCES AND UNITED STATES
26 BUREAU OF RECLAMATION
27 REQUEST FOR A CHANGE IN POINT OF
28 DIVERSION FOR CALIFORNIA WATER
FIX

**JOINDER OF COUNTY OF SAN JOAQUIN,
SAN JOAQUIN COUNTY FLOOD
CONTROL AND WATER CONSERVATION
DISTRICT, THE MOKELUMNE RIVER
WATER AND POWER AUTHORITY,
LOCAL AGENCIES OF THE NORTH
DELTA, BOGLE VINEYARDS, DIABLO
VINEYARDS AND STILLWATER
ORCHARDS IN CALIFORNIA WATER
RESEARCH'S OBJECTION TO
ADMISSION OF MODELING DATA FILES
AS STAND-ALONE EXHIBITS**

1 OSHA R. MESERVE (SBN 204240)
2 SOLURI MESERVE, A LAW CORPORATION
3 510 8th Street
4 Sacramento, CA 95814
5 Telephone: (916) 455-7300
6 Facsimile: (916) 244-7300
7 Email: osha@semlawyers.com

8 Attorneys for Protestants Local Agencies of the North
9 Delta Bogle Vineyards / Delta Watershed Landowner
10 Coalition Diablo Vineyards and
11 Brad Lange / Delta Watershed Landowner Coalition
12 Stillwater Orchards / Delta Watershed Landowner
13 Coalition

1 Protestants **COUNTY OF SAN JOAQUIN, SAN JOAQUIN COUNTY FLOOD**
2 **CONTROL AND WATER CONSERVATION DISTRICT, THE MOKELUMNE RIVER WATER**
3 **AND POWER AUTHORITY, LOCAL AGENCIES OF THE NORTH DELTA, BOGLE**
4 **VINEYARDS, DIABLO VINEYARDS AND STILLWATER ORCHARDS** (“San Joaquin County,
5 et al.”) hereby join in the Objection of California Water Research to Admission of Modeling
6 Data Files as Stand-Alone Exhibits, filed herein on March 7, 2018.

7 San Joaquin County Protestants, et al. incorporate by reference California Water
8 Research’s Objection and all documents and evidence filed in support thereof. In particular,
9 we believe that Petitioners have not carried their burden to provide water modeling evidence
10 showing that there would not be injury to legal users of water, or that the grant of the petition
11 would not result in unreasonable impacts to fish and wildlife, be contrary to the public interest,
12 or violate the public trust doctrine.

13 As an example, on March 1, 2018, protestant Snug Harbor Resorts, LLC, asked for
14 information regarding the modeled water quality impacts in the geographic area with which she
15 is concerned on Steamboat Slough, which were not included in the Petitioners’ Part 2 Case in
16 Chief testimony. The following day, one of the Department of Water Resources’ (“DWR”)
17 modeling witnesses, Ms. Tara Smith, provided oral testimony describing her finding that the
18 water quality outputs generally showed no problems in that geographic area. No
19 documentation of the results of Ms. Smith’s investigation was provided.

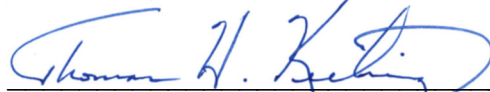
20 Snug Harbor Resorts is but one among many protestants with serious questions about
21 the model outputs for specific areas of the Delta other than those included in DWR’s evidence
22 and testimony thus far. As argued by California Water Research’s March 7, 2018 objection,
23 tables or excel spreadsheet outputs were in DWR’s possession and should have been
24 provided to inform the participants of the full results of the modeling undertaken for the
25 Petition. Moreover, such information is necessary to fulfil Water Code section 1701.2 and
26 California Code of Regulations, title 23, section 794 requirements, among others.

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Respectfully submitted,

Dated: March 12, 2018

THE FREEMAN FIRM



THOMAS H. KEELING
Attorneys for County of San Joaquin,
San Joaquin County Flood Control and
Water Conservation District, and
Mokelumne River Water and Power Authority

Dated: March 12, 2018

SOLURI MESERVE,
A LAW CORPORATION



OSHA R. MESERVE
Attorneys for Local Agencies of the North Delta,
Delta, Bogle Vineyards, Diablo Vineyards
and Brad Lange, and Stillwater Orchards