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June 10, 2016

The Honorable Felicia Marcus, Chair  
Co-Hearing Officer  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100

The Honorable Tam Doduc  
Co-Hearing Officer  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100

***Re: Reply To Petitioners' Opposition To Request For Extension Of Time To File And  
Serve Objections For The California WaterFix Hearing***

Dear Hearing Officers Doduc and Marcus:

The South Delta Agency, Central Delta Agency, Lafayette Ranch, Heritage Lands, Mark Bachetti Farms and Rudy Mussi Investments L.P. ("Protestants") herein reply to Petitioner's Opposition letter of June 3, 2016. Petitioners' audacity is apparently limitless. Mindful of the many other Protestants' comments in support of their requests for an extension of time to submit objections to Petitioners' recent data dump, and aware of the various replies in Opposition to Petitioners' objections to the request for additional time, I will focus my comments accordingly.

Petitioners cannot provide meaningful objections to the evidence and modeling recently disclosed by Petitioner for many reasons including but not limited to the following:

1) The petitioners have posted a set of revised models on the Hearing board web site. In order to fully understand this new modeling work, these models need to be compared to the previous modeling work that was completed for the BA and the RDEIR/SDEIS.

2) Little to no information has been forthcoming from the petitioners on what changes have been made to the models, placing the Protestants at a severe disadvantage. Without a summary of the changes to the models or a clear description on the exact conditions that each model represents, the Protestants are forced to evaluate each of the input and output files that are used in the model package. Without that comparison, the exact condition that each model represents will be unclear. The process involved in that necessary comparison is lengthy and time consuming. The basic steps required are shown as follows:

- a. Run each of the models.
- b. Compare the model output with the previous published runs for the compliance points as well as locations of interest to the Protestants.

- c. Evaluate the input files and compare to the previously published files to determine what parameters have been changed.

3) There are a total of 5,615 files in the new modeling data that was posted to the water fix site. For the DSM2 model alone, there are 284 separate input files. Since no documentation of the changes to the model have been presented by the petitioners, these files need to be compared to previous model runs to determine exactly what has been changed. The CALSIMII modeling work contains not only input files that need to be compared to previous runs, but numerous decision and logic code that define the operational criteria within the simulation that need to be evaluated. These are time consuming and voluminous tasks that need to be completed prior to moving to the next step of actually evaluating the results of the model runs, and comparing those results to the previous models presented by the Petitioners. Much of this could have been avoided if the petitioners had presented a through description of the models and the assumptions used in their development. Without that type of roadmap, it's almost a trial and error process of comparing input files to operational scenarios.

4) The revised models that were posted to the Cal WaterFix Hearing Site are missing several critical files for the DSM2 model to run including:

1. Channel\_Mini\_Calibration\_Grid\_20091007.inp
2. Reservoir\_mini\_Calibration\_Grid\_20090715.inp
3. Channel\_ic\_Mini\_Calibration\_Grid\_20090715.inp
4. Reservoir\_ic\_Mini\_Calibration\_Grid\_20090715.inp

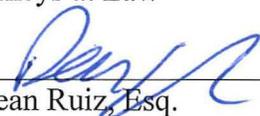
DWR states that the version of DSM2 that was used in the model development is version 8.0.6, yet these files are not included with that version of the program nor the recently posted revised model files. We do not know what changes to the grid may have been made to these files. We request that DWR submit a model package with all of the files necessary to run their revised models.

5) As has been identified by others, little information on the sensitivity of the models to different parameters has been presented. This type of sensitivity analysis is necessary to evaluate the true response of the model to changing parameters. Without that analysis, the Protestants are in the dark as to the true importance of the variables that are changed in each model.

Until Petitioners fully address these and many other issues, Protestants cannot even begin to develop meaningful objections to the evidence submitted thus far. Petitioners' objection to the many request for extensions of time is inexplicable. We respectfully urge you to extend the deadline for submission of objections by at least 60 days and that all other dates be adjusted accordingly.

Very truly yours,

HARRIS, PERISHO & RUIZ  
Attorneys at Law

  
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S. Dean Ruiz, Esq.