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8 BEFORE THE CALIFORNIA STATE WATER RESOURCES CONTROL BOARD
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10 HEARING IN THE MATTER OF
11 CALIFORNIA DEPARTMENT OF WATER
RESOURCES AND UNITED STATES
12 BUREAU OF RECLAMATION REQUEST
FOR A CHANGE IN POINT OF
13 DIVERSION FOR CALIFORNIA WATER
FIX
14

**CALIFORNIA DEPARTMENT OF
WATER RESOURCES' OBJECTIONS
TO SAN JUAN WATER DISTRICT
WRITTEN TESTIMONY AND
EXHIBITS SUBMITTED BY
PROTESTANTS IN SUPPORT OF
PART 1B CASE IN CHIEF AND
RELATED JOINDERS**

15 California Department of Water Resources ("DWR") submits the following
16 objections, motion to strike testimony and/or exclude a portion of testimony of San Juan
17 Water District's written testimony from Ms. Shauna Lorance, General Manager. (SJWD-
18 1, page 1.) SJWD's filing includes about 12 exhibits showing the its water service area,
19 contracts between SJWD and Bureau of Reclamation and other water supply
20 agreements, such as with Placer County Water Agency, and other figures and
21 documets. (Id.)
22

23 Ms. Lorance's testimony explains the source of SJWD's water supply from
24 Reclamation and other water agencies from the American River and the Folsom Lake
25 M&I intake. (Id., page 9.) Ms. Lorance also explains that if the Reservoir drops below a
26 certain elevation or storage volume, that it puts SJWD's M&I water supply at risk
27 because the intake is out of the water. (Id., paragraphs 37-39.)
28

1 Ms. Lorance cites to exhibit DWR-514, Figure 14, from DWR's written testimony on
2 modeling for the California WaterFix that shows end of September storage in Folsom
3 Reservoir. (Id., pages 12-14, paragraphs 50-56.) Her testimony claims the modeling
4 shows that with the Petitioned Project, in 5% of the years, Folsom Reservoir storage will
5 be drawn down to 90,000 acre-feet or less, at the end of September, and this level can
6 cause adverse effects to Folsom's M&I intake. (Id.) DWR objects to Ms. Lorance's
7 mischaracterization of the model results shown in Figure 14 because she indicates that
8 the "proposed project" causes the reduced storage. However, Figure 14, which shows
9 an exceedance curve of the no action alternative and 4 alternative operational scenarios,
10 indicates that all the alternatives, as well as the no action alternative, showed the
11 reduced storage level in 5% of the years.

12 Thus, the model results show that the reservoir will be drawn down to the low
13 storage under future conditions when there is no project and lower reservoir storage is
14 not caused by the Petitioned Project but by other conditions, such as dry hydrology.
15 Thus, Ms. Lorance incorrectly interprets the modeling results and incorrectly suggests
16 that SJWD will be injured by the Petitioned Project. The SJWD testimony
17 mischaracterizes the model results, is not the type of testimony that the State Water
18 Resources Control Board Hearing Officers can rely upon, and should be excluded or
19 stricken from SJWD-1, paragraphs 50-56. (See DWR Master Objection, section III)

20 **CONCLUSION**

21 For the reasons stated above and in the Objections Master Response, the SJWD's
22 case-in-chief includes that is not relevant, misrepresents and mischaracterizes DWR's
23 modeling exhibit and should be excluded from this hearing.

Dated: September 21, 2016

CALIFORNIA DEPARTMENT OF WATER
RESOURCES



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