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8 On behalf of Snug Harbor Resorts, LLC

9  
10 **BEFORE THE**  
11 **CALIFORNIA STATE WATER RESOURCES CONTROL BOARD**

12 HEARING IN THE MATTER OF  
13 CALIFORNIA DEPARTMENT OF  
14 WATER RESOURCES AND UNITED  
15 STATES BUREAU OF RECLAMATION  
16 REQUEST FOR A CHANGE IN POINT  
17 OF DIVERSION FOR CALIFORNIA  
18 WATER FIX

19 JOINDER IN MOTION TO FORMALLY  
20 CONSIDER ADDITIONAL  
21 INFORMATION SUBMITTED IN  
22 SUPPORT OF PETITION, AND  
23 REQUEST FOR READABLE  
24 INFORMATION SHOWING IMPACTS  
25 ON STEAMBOAT SLOUGH AT THE  
26 LOCATION OF THE PENINSULA  
27 REFERRED TO AS SNUG HARBOR

28 Protestant Snug Harbor Resorts, LLC, hereby joins and incorporates in full  
Deirdre Des Jardins' Feb 13, 2018 Motion to Formally Consider Additional Information  
Submitted in Support of Petition. Section 794, subdivision (a)(9) of the Board's  
regulations requires that the WaterFix change petition include "identification in  
quantitative terms of any projected change in water quantity, water quality, and  
reduction in availability of water within the streams affected by the proposed change(s.)"

Adequate flows and water levels in Steamboat Slough at the location of the Snug  
Harbor peninsula (formerly referred to as Martin's Island or Charleston) are essential to  
Snug Harbor's recreational business, and adequate drinking water quality is essential to  
Snug Harbor's water supply wells. The Department of Water Resources has yet to

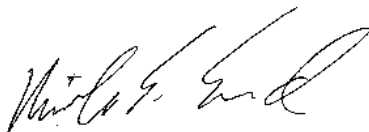
1 provide complete or accurate quantitative information on potential impacts to Steamboat  
2 Slough water quantity, water levels or water quality for the hearing. For water rights  
3 holders down stream of any proposed new intakes, the issue of how much fresh water  
4 flow is diverted is even more important than how that water is diverted. The raw  
5 modeling data submitted by the Petitioners in exhibit DWR-1077 is also not accessible  
6 to Snug Harbor Resorts, LLC, either for cross-examination or rebuttal.

7 In Phase 1 of the WaterFix hearing, at the direction of Hearing Officer Doduc, DWR  
8 provided Snug Harbor Resorts, LLC with two files showing graphic charts indicating  
9 minimum flows on Sutter Slough, Steamboat Slough, Sacramento River, Delta Cross  
10 Channel and Georgiana Slough with proposed WaterFix intakes operational. Those  
11 DWR charts were submitted into the record as SHR evidence SHR-350 and SHR-352,  
12 as exact replicas of the files and charts provided by DWR modelers. Without waiving  
13 objections to the accuracy of the assumptions about operations in the modeling, Snug  
14 Harbor Resorts, LLC request that the Hearing Officers direct Department of Water  
15 Resources and USBR, Petitioners, to provide updated charts and spreadsheets for any  
16 new modeling submitted for the hearing. The charts and spreadsheets should show  
17 minimum fresh water flows on each of the North Delta waterways listed above, and also  
18 note the location within each waterway the flow minimum is calculated, including  
19 minimum flows after all estimated diversions from agricultural or industrial uses along  
20 the waterways, and excluding periodic pulse flows for fish migration or restoration  
21 experimental purposes. These charts and spreadsheets should be provided prior to the  
22 hearing.

23 For Snug Harbor Resorts, LLC to adequately assess impacts to recreation and  
24 business uses at our location on Steamboat Slough, we would also need to be able to  
25 understand the maximum salinity encroachment expected at our location for all months  
26 of the year for all water year types, because the area around Ryer and Grand Islands

1 and surrounding waterways are known to be hydrogeologically vulnerable areas, which  
2 could thereby impact not just our surface water rights but also our public drinking water  
3 wells and water treatment system. Snug Harbor Resorts, LLC also requests that the  
4 Hearing Officers direct DWR and/or USBR to provide spreadsheets indicating expected  
5 water levels at low tides on Steamboat Slough at the north and south ends of the Snug  
6 Harbor peninsula if WaterFix intakes and tunnels were operational at each range of  
7 capacity proposed by Petitioners. We are a small recreational business in the Delta and  
8 do not have the budget to hire professional CALSIM and/or DSM2 modelers to extract  
9 the raw data. The Hearing Officers could direct DWR to render the data into a human  
10 readable format for general public understanding and provide the data to all parties to  
11 the WaterFix hearing. DWR's modelers have testified that they use spreadsheets to  
12 examine the CALSIM and DSM2 data. There is no reason these spreadsheets cannot  
13 be provided for Protestants. For this reason, Snug Harbor Resorts also moves to  
14 continue the WaterFix hearing until DWR provides the spreadsheets in response to the  
15 City of Antioch's subpoena duces tecum.

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17 Date: February 19, 2018

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20 Nicole Suard, Esq.

21 Snug Harbor Resorts, LLC  
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