

June 15, 2016

VIA ELECTRONIC MAIL: CWFhearing@waterboards.ca.gov

Felicia Marcus, Chair and Co-Hearing Officer
Tam Doduc, Member and Co-Hearing Officer
State Water Resources Control Board
1001 I Street
Sacramento, California 95814

Re: Cross-Examination Groupings for California WaterFix Hearing

Dear Chair Marcus and Member Doduc:

On behalf of the Sacramento Valley Water Users (SVWU), we provide our proposed groupings for cross-examination of Petitioners' witnesses during Part 1A of the California WaterFix Hearing.

First, the SVWU support organizing cross-examination of Petitioners' witnesses by scheduling Petitioners' lead and secondary witnesses on a particular subject to present direct testimony and then conducting those witnesses' cross-examination immediately following their direct testimony. In addition, consistent with Petitioners' May 31, 2016 letter to the SWRCB, the SVWU support the presentation of Petitioners' witness panels and their cross-examinations in the following order of subjects:

- Project overview;
- Engineering;
- Operations;
- Modeling; and
- Water rights.

The SVWU reserve their rights to re-call any of Petitioners' witnesses for further cross-examination if subsequent testimony requires it.

Second, the SVWU intend to coordinate in their cross-examination of Petitioners' witnesses to the fullest extent possible. The individual parties within the SVWU do not waive their rights to each conduct one-hour of cross-examination as to each of Petitioners' witnesses/witness panels. However, we expect that the SVWU's coordinated approach to cross-

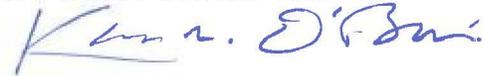
examination will be significantly consolidated and shorter than the allotted one hour per party. Although the SVWU will conduct a great majority of their cross-examination as a unified group, individual parties within the SVWU may have limited specific questions for follow-up after the coordinated questioning concludes.

Third, the SVWU request that they be scheduled for cross-examination of Petitioners' witnesses before any other protestants. In addition to the many SVWU parties, numerous notices of intent to appear filed by other parties to this proceeding identify experts at MBK Engineers as witnesses in support of their case in chief. (See e.g. Notice of Intent to Appear submitted by East Bay Municipal Water District, San Joaquin River Exchange Contractors Water Authority, and the South Valley Water Association, et al.). The SVWU has taken the lead in directing the work of MBK Engineers as related to the California WaterFix Hearing, including work related to Petitioners' testimony. In order to achieve maximum efficiency, the SVWU propose that they begin the cross-examination of each of the Petitioners' witnesses.

We appreciate your consideration of our proposal.

Very truly yours,

DOWNEY BRAND LLP



Kevin M. O'Brien



David Aladjem

NORTHERN CALIFORNIA WATER ASSOCIATION

/s/David J. Guy

David J. Guy, President

BARTKIEWICZ, KRONICK & SHANAHAN

/s/Alan Lilly

Alan Lilly

/s/Ryan Bezerra

Ryan Bezerra

SOMACH, SIMMONS & DUNN, PC

/s/Andrew M. Hitchings

Andrew M. Hitchings

/s/Aaron Ferguson

Aaron Ferguson

MINASIAN, MEITH, SOARES, SEXTON & COOPER, LLP

/s/Dustin C. Cooper

Dustin C. Cooper

STOEL RIVES LLP

/s/Wesley A. Miliband
Wesley A. Miliband

cc: Service List

Enclosure: Attachment 1 – SVWU Parties

Attachment 1—Sacramento Valley Water Users

Northern California Water Association

Clients represented by Downey Brand LLP

Carter Mutual Water Company
El Dorado Irrigation District
El Dorado Water & Power Authority
Howald Farms, Inc.
Maxwell Irrigation District
Natomas Central Mutual Water Company
Meridian Farms Water Company
Oji Brothers Farm, Inc.
Oji Family Partnership
Pelger Mutual Water Company
Pleasant-Grove Verona Mutual Water Co.
Princeton Codora-Glenn Irrigation District
Provident Irrigation District
Reclamation District 108
Sacramento Municipal Utility District
Henry D. Richter, et al.
River Garden Farms Company
South Sutter Water District
Sutter Extension Water District
Sutter Mutual Water Company
Tisdale Irrigation and Drainage Company
Windswept Land and Livestock Company

Clients represented by Somach Simmons & Dunn

Glenn-Colusa Irrigation District
Biggs-West Gridley Water District
Sacramento County Water Agency
Placer County Water Agency
Carmichael Water District

Clients represented by Bartkiewicz, Kronick & Shanahan

City of Folsom
City of Roseville
San Juan Water District
Sacramento Suburban Water District
Yuba County Water Agency

Clients represented by Minasian, Meith, Soares, Sexton & Cooper, LLP

Anderson-Cottonwood Irrigation District

Butte Water District

Nevada Irrigation District

Paradise Irrigation District

Plumas Mutual Water Company

Reclamation District No. 1004

Richvale Irrigation District

South Feather Water & Power Agency

Western Canal Water District

Clients represented by Stoel Rives

City of Sacramento

STATEMENT OF SERVICE

**CALIFORNIA WATERFIX PETITION HEARING
Department of Water Resources and U.S. Bureau of Reclamation (Petitioners)**

I hereby certify that I have this day submitted to the State Water Resources Control Board and caused a true and correct copy of the following document(s);

Cross-Examination Groupings for California WaterFix Hearing

to be served by **Electronic Mail** (email) upon the parties listed in Table 1 of the **Current Service List** for the California WaterFix Petition Hearing, dated June 9, 2016, posted by the State of Water Resources Control Board at
http://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/california_waterfix/service_list.shtml:

Note: In the event that any emails to any parties on the Current Service List are undeliverable, you must attempt to effectuate service using another method of service, if necessary, and submit another statement of service that describes any changes to the date and method of service for those parties.

For Petitioners Only:

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| | I caused a true and correct hard copy of the document(s) to be served by the following method of service to Suzanne Womack & Sheldon Moore, Clifton Court, L.P., 3619 Land Park Drive, Sacramento, CA 95818: Method of Service: _____ |
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I certify that the foregoing is true and correct and that this document was executed on June 15, 2016.

Signature: 

Name: Catharine Irvine

Title: Legal Secretary

Party/Affiliation: Downey Brand, LLP

Address: 621 Capitol Mall, Sacramento, CA 95814