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9 STATE WATER RESOURCES CONTROL BOARD

10 DIVISION OF WATER RIGHTS
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14 In the Matter of:) Hearing Officers: Tam Doduc and
15) Charles Hoppin
16 Water Right Applications 31487 and 31488)
17 filed by the United States Bureau of) **JOINT OBJECTIONS TO TCID**
18 Reclamation, and Petitions to Change License) **EXHIBITS**
19 3723 (Application 5169) of Washoe County)
20 Water Conservation District, License 4196) Date: July 21-23; 28-29, 2010
(Application 9247) of Truckee Meadows Water) Time: 9:00 a.m.
21 Authority, Permit 11605 (Application 15673)) Dept: 1001 I Street, Second Floor
22 and License 10180 (Application 18006) of the) Coastal Hearing Room
23 United States Bureau of Reclamation) Sacramento, California
24)

25 Pursuant to the State Water Resources Control Board's direction, the Bureau of
26 Reclamation, Washoe County Water Conservation District, Truckee Meadows Water Authority,
27 Pyramid Lake Paiute Tribe, City of Fernley, and California Department of Water Resources
28 submit the following objections to Truckee-Carson Irrigation District's Exhibits. As a general
note, it was agreed that where a TCID exhibit is the same as one of the Petitioners'/Applicant's
Joint Exhibit, that the latter shall be admitted in place of the former.

Exhibit Identification Number	Exhibit Description	Joint Objections
TCID-33	Decision regarding applications 5169, 5170, 6131, 6534, 9245, 9267, dated 11/3/1938	TCID-33 submitted as TCID-34
TCID-44	Indenture between Donner Lake Co. & TCID & SPPC., re: Donner Lake Storage Indenture (Multi-Party Deed) dated 5/3/1943	Not relevant
TCID-45	Agreement between TCID & SPPC re: Donner Lake operation and maintenance cost sharing and use of Donner Lake water dated 5/3/1943	Not relevant
TCID-134	Alpine Decree Excerpts, December 20, 1980.	Entire decree should be included
TCID-138	BOR Memorandum re: request for services from Robertson Software and attached statement of work, dated 2.24.1994	Not authenticated; Hearsay; Not relevant
TCID-140	Agreement Concerning Applications to Appropriate the waters of the Truckee River and its tributaries Among (the Tribe, SPPC, WCWCD, Reno, Sparks, Washoe County) May 31, 1994	Duplicate of TCID-262; Not relevant
TCID-143	Comments on 12-29-1994 TROA Alternatives Matrix, dated 12/29/1994	Not authenticated; Hearsay; Not relevant
TCID-145	Note from John Sarna re: major problem in Cal firm TC model run	Not authenticated; Hearsay; Not relevant
TCID-146	Draft Response to Request for Clarification of CEQA requirements for TROA EIS/EIR Alternatives, dated 2/9/1996	Not authenticated; Hearsay; Not relevant
TCID-147	Response to Request for Clarification of CEQA Requirements for TROA EIS/EIR Alternatives - DRAFT, 2/9/1996	Not authenticated; Hearsay; Not relevant
TCID-148	Fax from Bill Sikonia to Russ Armstrong, TCID, re: Truckee-Carson activities, dated March 14, 1996	Not authenticated; Hearsay; Not relevant
TCID-149	Letter from Bill Sikonia re: Truckee-Carson activities for March 14-26, 1996, dated 3/27/1996	Not authenticated; Hearsay; Not relevant
TCID-150	Email from Bill Sikonia re: TROA negotiations and modeling, dated 5/15/1996	Not authenticated; Hearsay; Not relevant
TCID-151	Letter from Bill Sikonia re: Negotiation Model Work, 7/26/1996	Not authenticated; Hearsay; Not relevant
TCID-152	Evaluation of TROA negotiation model by Bill Sikonia, dated 7/26/1996	Not authenticated; Hearsay; Not relevant
TCID-153	Letter from Bill Sikonia re: TROA, Simplified, 7/30/1996	Not authenticated; Hearsay; Not relevant

Exhibit Identification Number	Exhibit Description	Joint Objections
TCID-154	Memorandum to interested persons from Bill Greer re: documentation and quality-assurance work on the Truckee River Negotiation Model, dated 8/5/1 996	Not authenticated; Hearsay; Not relevant
TCID-155	Memo from Bill Sikonia re: Examples of Problems in code of the Negotiations Model, 8/20/1996	Not authenticated; Hearsay; Not relevant
TCID-156	Email from Morris Israel to Bill Sikonia re: Memo on a simple TROA, dated 8/25/1996	Not authenticated; Hearsay; Not relevant
TCID-157	Memo from Bill Sikonia re: Truckee River Operating Agreement, 10/11/1996	Not authenticated; Hearsay; Not relevant
TCID-158	Letter to W. Bettenberg from K. Cartier, dated 11/12/1996	Not authenticated; Hearsay; Not relevant
TCID-159	Letter to W. Bettenberg from David Robertson, dated 11/12/1996	Not authenticated; Hearsay; Not relevant
TCID-160	Letter from Bill Sikonia titled "Politics and Science," dated 11/14/1996	Not authenticated; Hearsay; Not relevant
TCID-163	Letter from Bill Sikonia to John Sarna re: Negotiation Model routines, dated 12/5/1996	Not authenticated; Hearsay; Not relevant
TCID-164	1997 Update to 1988 OCAP	Duplicate of TCID-222 and Pet./App. Joint-9
TCID-165	Michael Van Zandt comment letter re: Truckee River Operating Agreement Draft EIS/EIR, dated 6/29/1998	Not relevant; Hearsay
TCID-166	Email from Steve Alcorn re: TROA impacts and mitigation, dated 12/14/1998	Not authenticated; Not relevant; Hearsay
TCID-168	Email from John Sarna to Cal-TROA Team re: TROA derailment issue	Not authenticated; Not relevant; Hearsay
TCID-169	California Comments on 12/28/99 Draft TROA	Not authenticated; Not relevant; Hearsay
TCID-170	Memo titled "Background Information for Attached Model Results"	Not authenticated; Not relevant; Hearsay
TCID-171	Email from C. Buchanan to John Sarna re: hypothetical flow regimes, dated 1/1 8/2001	Not authenticated; Not relevant; Hearsay
TCID-172	Letter to W. Bettenberg and C. Hamon from R.M. Turnipseed transmitting attached table analyzing effect of TROA amendments to the Orr Ditch Decree, dated 1/30/2002	Not authenticated; Not relevant; Hearsay
TCID-173	TROA Implementation Planning Committee - Final Synopsis, Meeting #16 re: RiverWare TROA accounting system, 2/12/2002	Not authenticated; Not relevant; Hearsay
TCID-174	Draft Agenda for June 17, 2003 Meeting re TROMWARMF-DSSAMt modeling	Not authenticated; Not relevant; Hearsay

Exhibit Identification Number	Exhibit Description	Joint Objections
TCID-175	Memorandum to Mary Jo Elpers from Roderick Hall re: Truckee River Operations Model Lower Truckee Flow Regime Criteria, dated 6/26/2003	Not authenticated; Not relevant; Hearsay
TCID-176	Note from Rod Hall to Tom Scott re: Carson Division Supply, dated 8/6/2003	Not authenticated; Not relevant; Hearsay
TCID-177	Email to John Renning from Tom Scott re: Prosser storage, dated 11/13/2003	Not authenticated; Not relevant; Hearsay
TCID-178	Memorandum to Tom Scott from Rod Hall re: Prosser Reservoir - Minimum Storage and 5,000 acre-foot Objective Under TROA Conditions, dated 2/25/2004	Not authenticated; Not relevant; Hearsay
TCID-179	Letter to J. Renning, D. Casazza and S. Oldham from S. Herrera, Water Rights Permitting Section, dated 3/4/2004	Not authenticated; Not relevant; Hearsay
TCID-180	Email from Tom Scott to Tom Strekal re: Newlands & Chap 4, dated 6/22/2004	Not authenticated; Not relevant; Hearsay
TCID-182	Memo from Rod Hall to Tom Scott re Comments on October 7, 2004 Request for Information from TCID dated 11/16/04	Not authenticated; Not relevant; Hearsay
TCID-183	Principia, Kenneth Parr Comment letter re: Draft Truckee River Operating Agreement EIS/EIR, dated December 27, 2004.	Duplicate of SWRCB-7; Hearsay
TCID-184	Churchill County Comment letter re: the Revised Draft EIS/EIR. To Kenneth Parr, from Brad Goetsch dated December 27, 2004	Duplicate of SWRCB-7; Hearsay
TCID-185	Charles Binder comment letter to Mr. Kenneth Parr, re: Comments on August 2004 Revised Draft EIS/EIR for TROA, dated December 28, 2004	Duplicate of SWRCB-7; Hearsay
TCID-186	Letter to Kenneth Parr and Michael Cooney from James Kassel, dated 12/28/2004	Duplicated in SWRCB-7
TCID-187	Michael Van Zandt letter re: Truckee-Carson Irrigation District's Comments on Draft Truckee River Operating Agreement EIS/EIR, dated December 30, 2004	Duplicated in SWRCB-7; Hearsay
TCID-188	SWRCB Contact Report re: TROA Applications and Petitions for Change, dated 3/30/2005	Not relevant; Hearsay
TCID-192	May 24, 2006 Order from the Nevada Third Judicial District Court in Case No. 2521 9/25227	Not relevant
TCID-198	Notice of Petitions for Change (Applications 5169, 9247, and 15673) and Applications to Appropriate (31487 and 31488), dated January 30, 2007	Duplicate of SWRCB-1, SWRCB-2, SWRCB-3, SWRCB-4, SWRCB-5 and SWRCB-6

Exhibit Identification Number	Exhibit Description	Joint Objections
TCID-199	Protest to petition for change under Application 9247, License 4196 by TCID et al., supporting documents attached, dated 4/2/2007	Duplicate of SWRCB-1, SWRCB-2, SWRCB-3, SWRCB-4, SWRCB-5 and SWRCB-6; Pleadings - Hearsay
TCID-200	Protest to Application 31487 by TCID et al., supporting documents attached, dated 4/2/2007	Duplicate of SWRCB-1, SWRCB-2, SWRCB-3, SWRCB-4, SWRCB-5 and SWRCB-6; Pleadings - Hearsay
TCID-201	Protest to petition for change under Application 15673, Permit 11605, by TCID et al., supporting documents attached, dated 4/2/2007	Duplicate of SWRCB-1, SWRCB-2, SWRCB-3, SWRCB-4, SWRCB-5 and SWRCB-6; Pleadings - Hearsay
TCID-202	Protest to petition for change under Application 18006, License 10180 by TCID et al., supporting documents attached, dated 4/2/2007	Duplicate of SWRCB-1, SWRCB-2, SWRCB-3, SWRCB-4, SWRCB-5 and SWRCB-6; Pleadings - Hearsay
TCID-203	Protest to Application 31488 by TCID et al., supporting documents attached, dated 4/2/2007	Duplicate of SWRCB-1, SWRCB-2, SWRCB-3, SWRCB-4, SWRCB-5 and SWRCB-6; Pleadings - Hearsay
TCID-204	Protest to petition for change under Application 5169, License 3723 by TCID et al., supporting documents attached, dated 4/2/2007	Duplicate of SWRCB-1, SWRCB-2, SWRCB-3, SWRCB-4, SWRCB-5 and SWRCB-6; Pleadings - Hearsay
TCID-205	In the Office of the State Engineer of the State of Nevada Ruling #5747, dated 6/27/2007	Not relevant
TCID-206	Email from John Sarna to Steve Herrera re: TROA water right petitions and applications proposed writeup for FEIS/EIR, dated 7/5/2007	Not relevant; Not authenticated; Hearsay
TCID-210	Letter to Kenneth Parr from Michael Van Zandt dated November 14, 2008 re: Comments on TROA Rulemaking (RIN 1 006-AA48), dated November 14, 2008	Not relevant; Hearsay
TCID-213	<i>Churchill County, City of Fallon and TCID v. U.S. Department of Interior, et al.</i> , Complaint for Declaratory and Injunctive Relief, dated April 2, 2009	Not relevant; Pleadings - Hearsay
TCID-214	Email from John Sarna to Dave re: sensitivity analysis on "other water"	Not authenticated; Hearsay; Not relevant
TCID-215	Note from John Sarna re: major problem in California TC model run	Not authenticated; Hearsay; Duplicate of TCID-145

Exhibit Identification Number	Exhibit Description	Joint Objections
TCID-216	Issue raised by John Sarna: Will the TROA EIR be adequate given the new approach to validation of the operations model?	Not authenticated; Hearsay; Not relevant
TCID-217	Email to Cal-TROA Team from John Sarna. Re TROA derailment issue - Summary of initial operation studies from Rod Hall	Duplicate of TCID-168; Not authenticated; Not relevant; Hearsay
TCID-218	List of More Potential Updates to the Model based on TROA Negotiations since 1996	Not authenticated; Hearsay; Not relevant
TCID-219	2 page document with various subject matters, including: Fish management LCT/cui-ui, Newlands Project Credit Water and Claims 1 & 2 rights below Derby Dam	Not authenticated; Hearsay; Not relevant
TCID-220	Truckee River Operation Model General Discussion of Model Type	Not authenticated; Hearsay; Not relevant
TCID-221	Public Law 101 -618, dated 11/16/1990	Duplicate of Admitted Joint Applicant Exhibit 16
TCID-223	John Sarna notes re: Supplemental Analyses	Not authenticated; Hearsay; Not relevant
TCID-224	Memorandum re: Impact to Carson Division Supply for EIS/EIR runs	Not authenticated; Hearsay; Not relevant
TCID-225	Email from Tom Scott to Susan Levitzky re: CDFG Maximum Flow Limits on Newlands Project Credit, dated May 5, 2003	Not authenticated; Hearsay; Not relevant
TCID-226	Final TROA EIR/EIS excerpts highlighting use of the Truckee River Operations Model, January 2008	Duplicate of selected SWRCB-7 portions with highlights added
TCID-227	Truckee River Operating Agreement (Signed), September 2008	Duplicate of Pet./App. Joint-19
TCID-233	TMWA Nevada Change Application 73783 to implement TROA, February 1, 2006	Not relevant
TCID-234	TMWA Nevada Change Application 73783S1 to implement TROA, December 13, 2006	Not relevant
TCID-235	TMWA Nevada Change Application 73783S2 to implement TROA, December 13, 2006	Not relevant
TCID-236	TMWA Nevada Change Application 73783S3 to implement TROA, January 4, 2008	Not relevant
TCID-237	TMWA Nevada Change Application 73783S4 to implement TROA, October 3, 2008	Not relevant
TCID-238	Judgment and Decree - Petition Confirming Proceedings Authorizing TCID to enter the TRA, October 11, 1937	Not relevant

Exhibit Identification Number	Exhibit Description	Joint Objections
TCID-242	BOR map of the Newlands Project, dated August 1990	Not relevant
TCID-243	Letter to Bill Bettenberg from David Robertson re: validation of the TROA model, dated 9/10/1996	Duplicate of TCID-159; Not authenticated; Not relevant; Hearsay
TCID-245	State Engineer Ruling #5791, dated 20/23/2007	Objections as set forth in TMWA Motion to Exclude; Not relevant; Hearsay
TCID-246	State Engineer Ruling #5823, dated 3/18/2008	Objections as set forth in TMWA Motion to Exclude; Not relevant; Hearsay
TCID-247	State Engineer Ruling #3739, dated 11/14/1989	Objections as set forth in TMWA Motion to Exclude; Not relevant; Hearsay
TCID-248	State Engineer Ruling #3875, dated 3/9/1992	Objections as set forth in TMWA Motion to Exclude; Not relevant; Hearsay
TCID-249	State Engineer Ruling #4005, dated 6/28/1993	Objections as set forth in TMWA Motion to Exclude; Not relevant; Hearsay
TCID-250	State Engineer Ruling #4011, dated 6/30/1993	Objections as set forth in TMWA Motion to Exclude; Not relevant; Hearsay
TCID-251	State Engineer Ruling #4449, dated 10/21/1996	Objections as set forth in TMWA Motion to Exclude; Not relevant; Hearsay
TCID-252	State Engineer Ruling #4486, dated 1/10/1997	Objections as set forth in TMWA Motion to Exclude; Not relevant; Hearsay
TCID-253	State Engineer Ruling #4582, dated 11/13/1997	Objections as set forth in TMWA Motion to Exclude; Not relevant; Hearsay
TCID-254	State Engineer Ruling #4642, dated 6/15/1998	Objections as set forth in TMWA Motion to Exclude; Not relevant; Hearsay
TCID-255	Water Research & Development Report Excerpts, Application 55675, dated November 1991	Objections as set forth in TMWA Motion to Exclude; Not relevant; Hearsay

Exhibit Identification Number	Exhibit Description	Joint Objections
TCID-256	State Engineer letter to City of Reno, dated 7/6/1994	Objections as set forth in TMWA Motion to Exclude; Not relevant; Hearsay
TCID-257	CES letter report to City of Reno, dated 9/20/1994	Objections as set forth in TMWA Motion to Exclude; Not relevant; Hearsay
TCID-258	Application 77221 filed by City of Reno to Appropriate Waters of Chalk Creek; TCID, TMWA & Churchill Co. Protests to Application 77221; State Engineer Ruling #5972	Objections as set forth in TMWA Motion to Exclude; Not relevant; Hearsay
TCID-261	State Engineer Permit 29973, dated 2/15/1995	Not relevant
TCID-262	Agreement Concerning Applications To Appropriate the waters of the Truckee River and its tributaries Among (the Tribe, SPPC, WCWCD, Reno, Sparks, Washoe County) May 31, 1989	Duplicate of TCID-140; Not relevant
TCID-263	Letter from Lyman McConnell to Mike Turnipseed, dated 1/4/1996	Objections as set forth in TMWA Motion to Exclude; Not relevant; Hearsay
TCID-264	Letter from Mike Turnipseed to Lyman McConnell, dated 1/5/1996	Objections as set forth in TMWA Motion to Exclude; Not relevant; Hearsay
TCID-270	BOR map titled "Stampede Dam - Safety of Dams Modification, Location and Vicinity Maps - Sierra County, California," dated December 2009	Not relevant
TCID-271	BOR map titled "Stampede Dam Safety of Dams Modification, Reservoir Water Surface Elevations," dated 10/17/2009	Not relevant
TCID-272	Technical Memorandum from Charles W. Binder to Michael J. Van Zandt re: Reported Elevation and Storage Data for Selected Reservoirs, Truckee and Carson River Basins, January 1917 through December 2008, dated 8/14/2009	Not relevant; Hearsay; Not authenticated; Removed from Mahannah's testimony
TCID-273	Technical Memorandum from Charles W. Binder to Michael J. Van Zandt re: Reported Daily Discharge for Selected Gages, Truckee and Carson River Basins, January 1909 through December 2008, dated 8/14/2009	Not relevant; Hearsay; Not authenticated; Removed from Mahannah's testimony
TCID-277	Application and use report history for Boca Dam, Application 5169	Duplicate of SWRCB-1
TCID-278	Application and use report history for Stampede Reservoir, Application 15673	Duplicate of SWRCB-3

Exhibit Identification Number	Exhibit Description	Joint Objections
TCID-279	Application and use report history for Prosser Dam, Application 18006	Duplicate of SWRCB-4
TCID-280	Expert Report by Chris Mahannah re: Protestants Expert Report -- Agricultural Consumptive Use, dated 6/28/2010	Objections as set forth in TMWA's Motion to Exclude
TCID-282	Direct Testimony of Lyman F. McConnell in support of Protest of Truckee-Carson Irrigation District, dated 7/28/2010	Objections as set forth in TMWA's Motion to Exclude
TCID-283	<i>It appears that these numbers were simply skipped by TCID. If indeed there are Exhibits to go with these numbers, then these parties stand on objections made on the record, if any.</i>	
TCID-284		
TCID-285		
TCID-286		
TCID-287		Mahannah Rebuttal Report, 7/28/2010
TCID-288	In Re Application 9330 - Transcript	Objections as stated at the hearing
TCID-289	Table-1 Flow Regime for Cui--Ui	Objections as stated at the hearing, including need for complete document
TCID-291	Sample hydrograph	Objections as stated at the hearing
TCID-292	Email 6/29/2010	Objections as stated at the hearing
TCID-294	4/22/2009 State Board Letter	Duplicate of USBR-19
TCID-295	Individual Contributing Watersheds Map	Objections as stated at the hearing
TCID-298	USBR-7 Table 3 Revised	Objections as stated at the hearing
TCID-299	USBR-7 Table 8 - Revised	Objections as stated at the hearing

Exhibit Identification Number	Exhibit Description	Joint Objections
TCID-300	USBR-7 Table 3 - Revised	Objections as stated at the hearing
TCID-301	Summary of BOR Stampede Storage Project Reports	Objections as stated at the hearing
TCID-304	Knox Rebuttal Report	Objections as stated at the hearing

Respectfully submitted on behalf of the parties referenced above.

Dated: July 30, 2010.

WOODBURN AND WEDGE

By: Dale E. Ferguson, for
 Gordon H. DePaoli
 Attorneys for Truckee Meadows Water Authority

1 **CERTIFICATE OF ELECTRONIC SERVICE**

2 I hereby certify that on July 30, 2010, I served a copy of the attached *Joint Objections to*
3 *TCID Exhibits* via electronic mail to the parties listed below:

4 Division of Water Rights
5 State Water Resources Control Board
6 Attn: Paul Murphey
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