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

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

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

18 California Department of Water Resources ("DWR") submits the following
19 objections, motion to strike testimony and/or exclude portions of testimony of the City of
20 Roseville's written testimony from Mr. Richard Plecker, City of Roseville's Environmental
21 Utilities Director. (Roseville-1, page 1.) The reasons for these objections are set forth
22 below and in DWR's Master Objections to Protestants' Cases-in-Chief Collectively
23 ("Master Objections"), filed simultaneously with these objections. These objections
24 incorporate the arguments and reasoning in the Master Objections. Roseville's filing
25 includes about 15 exhibits showing water service contracts between Roseville and the
26 U.S. Bureau of Reclamation ("Reclamation") and other water supply agreements with
27 other agencies, such as Placer County Water Agency and San Juan Water District. (See
28 Roseville-1.)

1 Mr. Plecker's testimony explains the source of Roseville's water supply from
2 Reclamation and other water agencies. He explains that Roseville is highly dependent
3 on surface water diverted directly from Folsom Reservoir. (Roseville-1, page 1.)
4 Reclamation operates Folsom Reservoir as part of the federal Central Valley Project and
5 manages the reservoir to preserve reservoir storage at certain elevations. (*Id.*, pages 11-
6 15.) Mr. Plecker explains that if the reservoir drops below a certain elevation or storage
7 volume, that it puts Roseville's M&I water supply at risk because the intake is out of the
8 water. (*Id.*, page 11, paragraphs 39 and 40.)

9 Mr. Plecker cites to exhibit DWR-514, Figure 14, from DWR's written testimony on
10 modeling for the California WaterFix that shows end of September storage in Folsom
11 Reservoir. (*Id.*, page 14, paragraph 54.) His testimony claims the modeling shows the
12 Petitioned Project, in 5% of the years, will result in Folsom Reservoir storage to be
13 drawn down to 90,000 acre-feet or less at the end of September, and this level can
14 cause adverse effects to the Roseville intake. (*Id.*, page 14, paragraph 54.) DWR
15 objects to Mr. Plecker's mischaracterization of the model results shown in Figure 14
16 because he indicates that the "proposed project" causes the reduced storage. However,
17 Figure 14, which shows an exceedance curve of the no action alternative and 4
18 alternative operational scenarios indicates that all of the alternatives, as well as the no
19 action alternative, showed the reduced storage level in 5% of the years.

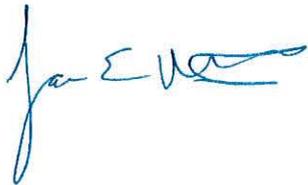
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21 Thus, the model results show that the reservoir will be drawn down to the low
22 storage under future conditions when there is no project. The concerns of lower reservoir
23 storage are not caused by the Petitioned Project but by other conditions, such as dry
24 hydrology. Thus, Mr. Plecker incorrectly interprets the modeling results and incorrectly
25 suggests that Roseville will be injured by the Petitioned Project. The Roseville testimony
26 mischaracterizes the model results and should be excluded or stricken from paragraphs
27 54, 57, 59, 61 and 62 on pages 11-16.

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For the reasons stated above and in the Master Objections, Roseville's case-in-chief includes testimony on pages 11-16 that misrepresents and mischaracterizes DWR's modeling exhibits and should be excluded from this hearing.

Dated: September 21, 2016

CALIFORNIA DEPARTMENT OF WATER RESOURCES



Tripp Mizell
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