June 6, 2016

VIA E-MAIL

Hearing Chair Tam Doduc
Hearing Officer Felicia Marcus
State Water Resources Control Board
Sacramento, CA
CWFHearing@waterboards.ca.gov

Re: Request for Extension of time to file and serve Objections in Hearing on California Waterfix Water Rights Change Petition

Dear Hearing Chair Doduc and Hearing Officer Marcus:

Protestant Islands, Inc. respectfully requests a 27-day extension of time in the Hearing on the Waterfix Change Petition for the filing and service of written objections concerning the petitioners' case in chief. This request, if granted, would change the current time for receipt of written procedural/evidentiary objections from 12:00 noon on June 15, 2016, to 12:00 noon on July 12, 2016.

Petitioners' May 31 submittal includes proposed testimony, witness qualifications, exhibit lists, and more than 180 exhibits, which require close study and analysis. Petitioners also recently submitted updated modeling related to the proposed project, which includes at least 19.3 GB of data, according to the Water Board's website. It is not reasonable or realistic to expect that protestant will have read and evaluated the voluminous set of documents and modeling analysis submitted by petitioners by June 15.

Islands, Inc. joins in extension requests submitted by other protestants including the Central and South Delta Water Agencies, AquaAlliance, Sierra Club California, Friends of the River, California Sportfishing Protection Alliance, Environmental Justice Coalition for Water, Environmental Water Caucus, Planning and Conservation League, Restore the Delta, County of San Joaquin, San Joaquin County Flood Control and Water Conservation District.

Granting this extension request will provide protestants reasonable opportunity identify and present appropriate objections to petitioners' May 31 submission and updated modeling analysis in advance of the July 26, 2016 hearing commencement date, while ensuring that petitioners are apprised of the objections in sufficient time prior to the hearing.
Thank you for your prompt consideration of this request.

Regards,

Michael J. Van Zandt

cc: All by electronic service
All Party Representatives and SWRCB CalWaterFix Service List Islands, Inc.
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):

Request for Extension of Time to file and serve Objections in Hearing on California Waterfix Water Rights Change Petition

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 6/7/16, posted by the State 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:

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: 

I certify that the foregoing is true and correct and that this document was executed on 6/7/16

Date

Signature: 

Name: Keith Kiley
Title: Legal Secretary
Party/Affiliation: Islands, Inc.
Address: Hanson Bridgett LLP
425 Market Street, 26th Floor
San Francisco, CA 94105