
From: sunshine@snugharbor.net
Sent: Friday, May 4, 2018 7:52 AM
To: CWFhearing
Cc: office@ecosacramento.net; osha@semlawyers.com; philip.pogledich@yolocounty.org; pkf@bkslawfirm.com; pminasian@minasianlaw.com; pp@planetarysolutionaries.org; psimmons@somachlaw.com; pwilliams@westlandswater.org; rharms@kmtg.com; rebecca.akroyd@sldmwa.org; rbernal@ci.antioch.ca.us; rmaddow@bpmnj.com; rdenton06@comcast.net; rmburness@comcast.net; roland@ssjmud.org; rsb@bkslawfirm.com; rsmith@downeybrand.com; russell@spalettalaw.com; ryan.hernandez@dcd.cccounty.us; rzwilling@defenders.org; sae16@lsid.org; schaffin@awattorneys.com; sclarke@volkerlaw.com; sdalke@kern-tulare.com; sgeivet@ocsnet.net; smorris@swc.org; Sophie.Froelich@Roll.com; sonstot@awattorneys.com; srothert@americanrivers.org; ssaxton@downeybrand.com; ssdwaterfix@somachlaw.com; stephen.siptroth@cc.cccounty.us; sunshine@snugharbor.net; svolker@volkerlaw.com; sgrady@eslawfirm.com; red@eslawfirm.com; tara.mazzanti@stocktonca.gov; tgohring@waterforum.org; tgstoked@gmail.com; thomas.esqueda@fresno.gov; tim@restorethedelta.org; tkeeling@freemanfirm.com; trobancho@freemanfirm.com; towater@olaughlinparis.com; vkincaid@olaughlinparis.com; wes.miliband@stoel.com; wfemlen@solanocounty.com; wirthsoscranes@yahoo.com
Subject: SHR email response to DWR evidence objections, and Statement of Service attached
Attachments: SHRservice5-4-18.pdf

Dear Hearing Officers,

As you may be aware of, Snug Harbor Resorts, LLC ("SHR") and Department of Water Resources' ("DWR") worked to resolve DWR's objections to SHR references to draft BDCP impacts, and also DWR objections to some of the SHR documents submitted into evidence. SHR and DWR came to an agreement, I revised the SHR Exhibit List, revised my written testimony and submitted the redline version, withdrew documents not utilized in my testimony or cross-examination of other witnesses, and DWR agreed to not object to my revised testimony and the documents as submitted, noting the specific slides to be admitted into evidence. I thought all was settled.

However, this email responds to the DWR concerns regarding the admission of certain agreed upon SHR slides within Exhibits SHR-2-251, 2-263 and 2-264. Consistent with what occurred under similar circumstances in Part 1, SHR believed that notating the specific slides in the exhibit index (updated April 25, 2018) that DWR agreed could be admitted into evidence was appropriate. (See, e.g. SHR-17, 102, 104, 105 and 389 Errata.) Therefore, the exhibits themselves, all of which I prepared myself, were not altered, and were submitted into evidence on time.

Should the Hearing Officers wish the exhibits SHR-2-251, 2-263 and 2-264 to be modified by removing unused slides per DWR request, SHR will certainly comply. If that is the case, I request that I be allowed to create a cover page for each revised slide set, noting the online location of the complete slide set since DWR request is to submit only a portion of documents that were or may have been used in other public meetings or presentations by myself in the past. I also request that I would be given several days to revise the exhibits because this is now our busy season in the Delta and the many road blockages due to many bridge repairs going on over the past week in the North Delta has created tremendous traffic back ups which has resulted in my needing to revise online travel maps for several websites to reflect all the roads that block RV access in the North Delta at this time.

Thank you for considering this additional information.

Sincerely,

Nicole Suard, Esq.
Managiing Member,

Snug Harbor Resorts, LLC

Note that this email is sent out in 2 batches due to size of list service. This is batch O through Z.