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16 BEFORE THE CALIFORNIA STATE WATER RESOURCES CONTROL BOARD

17 In the matter of Hearing re California
18 WaterFix Petition for Change

19 **SACRAMENTO VALLEY WATER**
20 **USERS' RESPONSE TO OBJECTIONS TO**
21 **WRITTEN TESTIMONY AND EXHIBITS**

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1 **I. INTRODUCTION**

2 The objections submitted by San Luis & Delta Mendota Water Authority (“SLDMWA”)
 3 to the testimony of Walter Bourez offered by the Sacramento Valley Water Users¹ (“SVWU”) are
 4 without merit. As that testimony is relevant, reliable, and plainly admissible, the SVWU
 5 respectfully request that the SWRCB overrule the objections in their entirety and deny
 6 SLDMWA’s accompanying request to exclude this evidence.

7 **II. BACKGROUND**

8 Water Code section 1702 requires that, when a petition for change is filed, the petitioner
 9 must establish that the change will not operate to the injury of any legal user of the water
 10 involved. (Water Code, § 1702.) The burden of proof is on the petitioner (SWRCB Order No.
 11 95-6, at p. 7.) Part 1 of this hearing therefore addresses whether the Department of Water
 12 Resources' ("DWR") and the Bureau of Reclamation's proposed changes would injure any
 13 municipal, industrial or agricultural uses of water, including associated legal users of water.
 14 (October 30, 2015 Notice of Hearing (“Notice”), p. 11.)

15 On September 1, 2016, the parties of the SVWU jointly submitted the expert testimony
 16 and exhibits of Messrs. Walter Bourez and Dan Easton of MBK Engineers on issues common to
 17 the SVWU parties. SLDMWA objects to certain portions of Mr. Bourez’s testimony on the
 18 grounds that this testimony is hearsay, irrelevant, and would result in undue consumption of time.
 19 For the reasons stated below, the SWRCB should overrule SLDMWA's objections.

20 **III. ARGUMENT**

21 Evidence in a hearing on a petition for change is admitted in accordance with Government
 22 Code § 11513. (Cal. Code Regs. tit. 23, § 648.5.1.) Under Government Code section 11513(c),
 23 relevant evidence must be admitted if “it is the sort of evidence on which responsible persons are
 24 accustomed to rely in the conduct of serious affairs, regardless of the existence of any common
 25 law or statutory rule which might make improper the admission of the evidence over objection in
 26

27 ¹ As shown in the signature block on the last page of these objections, each member of the Sacramento Valley Water
 28 Users is a party to this proceeding. This grouping has been coordinated for the convenience and expedience of the
 SWRCB and to avoid unnecessary duplication.

1 civil actions.” (Gov. Code § 11513(c).) The testimony of Messrs. Bourez and Easton testimony
2 is both relevant and reliable, would be admissible in any civil action and is admissible in this
3 hearing.

4 **A. The statements offered by Mr. Bourez are admissible expert testimony.**

5 SLDMA objects to paragraphs 6 through 8, 12 through 13, and 17 through 19 of Mr.
6 Bourez’s testimony as inadmissible hearsay. Those paragraphs either identify or briefly describe
7 the findings in certain reports prepared by MBK Engineers. Each report is attached as an exhibit,
8 and each is authored either by Mr. Bourez (see Exhibit SVWU-100, ¶ 5.), or by MBK Engineers
9 generally. Initially, none of Mr. Bourez’s testimony to which SLDMWA objects is hearsay in the
10 context of this hearing. Under Evidence Code section 1200, hearsay is a statement made other
11 than by a witness while testifying at the hearing. The SWRCB ordered that direct testimony in
12 this hearing be submitted in writing. (Notice, Enclosure D, p. 33) The paragraphs to which
13 SLDMWA objects refer to written exhibits Mr. Bourez has adopted as his testimony in his written
14 testimony. The statements and reports to which SLDMWA objects therefore are just as much
15 testimony in this hearing as the rest of Mr. Bourez’s written testimony. Statements of a witness
16 explaining his interpretation of an exhibit which is also offered as evidence are not hearsay. (See,
17 e.g., *People v. Cudjo* (1993) 6 Cal.4th 585, 608 (“Neither the hearsay rule nor its exceptions are
18 concerned with the credibility of witnesses who testify directly to the jury.”).)

19 The SWRCB also has previously stated it will “decline to exclude or strike any evidence
20 on the grounds that it is hearsay,” but will consider relevant hearsay evidence “subject to the
21 limitations imposed by Government Code section 11513, subdivision (d).” (Procedural Ruling on
22 Motions filed in the matter the Administrative Civil Liability Complaint against Byron-Bethanny
23 Irrigation District and Draft Cease and Desist Order against West Side Irrigation District, March
24 18, p. 4.) Under Government Code section 11513, hearsay evidence may be used “for the purpose
25 of supplementing or explaining other evidence” but is not sufficient in itself to support a finding
26 by the Board, unless that evidence “would be admissible over objection in civil actions.” (Gov.
27 Code, § 11513(d); see also Notice, Enclosure D, p. 36.)

28 The testimony to which SLDMWA objects also is appropriate expert testimony. Evidence

1 Code sections 801 and following govern the admissibility of expert testimony in civil actions.
2 Under Evidence Code section 801, the opinion testimony of an expert may be based on any
3 matter personally perceived by or known to the expert or any matter “made known” to the expert.
4 An expert is entitled to base his opinion upon technical reports and scientific literature, provided
5 such matter is “of a type that reasonably may be relied upon by an expert in forming an opinion
6 upon the subject to which his testimony relates.” (Evid. Code, § 801(b); *People v. Bui* (2001) 86
7 Cal.App.4th 1187, 1196.)

8 SLDMWA has not objected to the admission of the exhibits themselves as hearsay, *but*
9 *even if it did*, Mr. Bourez would be entitled to rely on that evidence to form his expert opinion.
10 An expert witness is entitled to rely upon his own reports, and the reports prepared by other
11 experts, in formulating his testimony. (See Evid. Code, § 804.) An objection on the grounds that
12 an expert has relied on inadmissible material to form an opinion (for example, hearsay) goes
13 “only to the purpose for which the challenged statements may be received. The correct ruling is
14 not to exclude them...the trial court need only confirm that it is not accepting the challenged
15 statements as proof of the matters asserted, but only as a foundation for the accompanying
16 opinions.” (*Cole v. Town of Los Gatos* (2012) 205 Cal.App.4th 749, 766.) There is no leap of
17 logic here: Mr. Bourez’s testimony is founded on reports that he either participated in preparing,
18 or which were prepared by his firm, and with which he is intimately acquainted.

19 In any event, the testimony and reports offered are the “sort of evidence on which
20 responsible persons are accustomed to rely in the conduct of serious affairs” and should be
21 admitted on this basis alone. (See Gov. Code § 11513(c).)

22 **B. Mr. Bourez’s comments on the RDEIR/SDEIS methodology are relevant and**
23 **reliable.**

24 SLDMWA objects to Mr. Bourez’s summary of his firm’s September 2015 technical
25 comments on the Draft Environmental Statement for the Coordinated Long-Term Operation of
26 the Central Valley Project and State Water Project Draft Environmental Impact Statement (“LT
27 Ops DEIS”), on the grounds that the operations described in that document are not the same as
28 the operations anticipated for the current Project, and that the testimony is therefore not relevant.

1 Evidence is relevant if it has “any tendency in reason to prove or disprove any disputed
2 fact that is of consequence to the determination of the action.” (Evid. Code, § 210.) The question
3 presented in Part 1 of this hearing is whether Petitioners have demonstrated that the proposed
4 change will not cause injury to a legal user of water. (Notice, p. 11.) The SWRCB has explained
5 that a party may rely on a CEQA document “as evidence of the potential effects of the project on
6 legal users of water, or they may wish to refute that analysis.” (Jan. 15, 2016 Pre-Hearing
7 Conference Agenda, p. 5-6.)

8 As Mr. Bourez’s testimony explains, the 2015 technical comments are relevant to this
9 stage of the hearing because the flawed methodology identified in those comments was carried
10 over into the Bay-Delta Conservation Plan DEIS/EIR and the California Water Fix Revised
11 DEIS/EIR, and results in unrealistic assumptions about the ability of the Project to meet existing
12 regulatory and legal demands for water. Mr. Bourez’s testimony identifies specific flaws in
13 Petitioners’ modeling that, if correctly analyzed, reveal injury to numerous legal users of water
14 and is directly relevant to Part 1.

15 **C. The admission of Mr. Bourez’s testimony will not result in undue**
16 **consumption of time.**

17 The hearing officers have discretion to exclude evidence if its probative value is
18 substantially outweighed by the probability that its admission will necessitate undue consumption
19 of time. (Govt. Code, § 11513 subd. (f); Hearing Officers’ Ruling on Post-Hearing Evidence
20 Motions in the Fahey matter, May 23, 2016, at p. 1.) On these grounds, SLDMWA asks that Mr.
21 Bourez’s testimony be excluded. However, SLDMWA has failed to demonstrate that the
22 significant probative value of this evidence is “substantially outweighed” by the probability that
23 this testimony’s admission will result in undue consumption of time. The testimony offered by
24 Mr. Bourez reveals fundamental flaws in the modeling of the current project, and Mr. Bourez has
25 been offered by 41 separate parties as a witness. This testimony has high probative value, and its
26 presentation, given its importance to the central hearing issues and the number of parties
27 coordinating to present it, does not result in the undue consumption of time. (See Oct. 7 Ruling,
28 p. 6 (“The presentation of joint panels and joint cases in chief will serve to improve the efficiency

of the hearing...”).)

IV. SPECIFIC RESPONSES TO SLDMWA OBJECTIONS

The SVWU offer the following responses to the specific portions of testimony that SLDMWA has objected to:

<p><u>Evidence Objected to:</u> Bourez testimony, ¶¶ 6-7.</p> <p><u>Objection:</u> Hearsay, Gov. Code § 11513 (d).</p>	<p><u>Response to Objection:</u> This is not hearsay. SVWU-109 is a technical report authored by MBK Engineers, the contents of which Mr. Bourez is familiar with, and which he is entitled to rely upon in preparation of his expert testimony.</p>
<p><u>Evidence Objected to:</u> Bourez testimony, ¶ 8</p> <p><u>Objection:</u> Hearsay, Gov. Code § 11513 (d).</p>	<p><u>Response to Objection:</u> This is not hearsay. SVWU-108 is a technical report authored by MBK Engineers, the contents of which Mr. Bourez is familiar with, and which he is entitled to rely upon in preparation of his expert testimony.</p>
<p><u>Evidence Objected to:</u> Bourez testimony, ¶¶12-13.</p> <p><u>Objection:</u> Hearsay, Gov. Code § 11513 (d).</p>	<p><u>Response to Objection:</u> This is not hearsay. SVWU-102 is a technical report authored by MBK Engineers, the contents of which Mr. Bourez is familiar with, and which he is entitled to rely upon in preparation of his expert testimony.</p>
<p><u>Evidence Objected to:</u> Bourez testimony, ¶¶17-18</p> <p><u>Objection:</u> Hearsay, Gov. Code § 11513 (d).</p>	<p><u>Response to Objection:</u> This is not hearsay. SVWU-104 is an analysis co-authored by Mr. Bourez.</p>
<p><u>Evidence Objected to:</u> Bourez testimony, ¶19.</p> <p><u>Objection:</u> Hearsay, Gov. Code § 11513 (d).</p>	<p><u>Response to Objection:</u> This is not hearsay. SVWU-107 is a technical report authored by MBK Engineers, the contents of which Mr. Bourez is familiar with, and which he is entitled to rely upon in preparation of his expert testimony.</p>
<p><u>Evidence Objected to:</u> Bourez testimony, ¶¶17-18.</p> <p><u>Objection:</u> Relevancy, the operations described in the DEIR are not the relevant operations for the Project.</p>	<p><u>Response to Objection:</u> The evidence is relevant to this proceeding because the climate change analysis in the LT/DEIS and the climate change analysis presented in this proceeding use the same methodology.</p>

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<p><u>Evidence Objected to:</u> Bourez testimony, ¶¶ 9-11.</p> <p><u>Objection:</u> Consideration of this testimony would result in undue consumption of time.</p>	<p><u>Response to Objections:</u> This testimony reveals fundamental flaws in the modeling of the current project, and Mr. Bourez has been offered by 41 separate parties as a witness. This testimony has high probative value, and its presentation, given its importance to the central hearing issues and the number of parties coordinating to present it, does not result in the undue consumption of time.</p>
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V. **DWR’S ASSERTION REGARDING SVWU’S STATUS AS A PARTY ARE WITHOUT MERIT.**

DWR did not submit any specific objections to the testimony of Walter Bourez or Dan Easton. (See California Department of Water Resources’ Master Objections to Protestants’ Cases-in-Chief Collectively, at Attachment B (listing of the specific objections filed by DWR).)² Rather, DWR asserts in a footnote in its Objections to Sacramento Valley Group Written Testimony and Exhibits Submitted by Protestants in Support of Part 1B Case in Chief and Related Joinders (the “SVG Objection”) that “the testimony submitted under the name of SVWU does not provide sufficient reference to the actual parties it seeks to represent.” (SVG Objection, p. 2 n. 2.) Contrary to DWR’s assertion, the parties of the SVWU made clear their coordinated submittal of the testimony of Messrs. Bourez and Easton on the date of that submittal, September 1, 2016. Specifically, the cover letter to the submittal stated “The Sacramento Valley Water Users (“SVWU”) is comprised of the protestants identified in Attachment A. The SVWU parties hereby jointly submit written testimony for the hearing . . . The submittal includes: written direct testimony of Walter Bourez (MBK Engineers), Dan Easton (MBK Engineers), SVWU’s exhibit identification index, a Powerpoint presentation, exhibits, and an opening statement.” Each member of the SVWU is a party to this proceeding, each has been clearly identified, and the parties have coordinated as the SVWU to offer the testimony of Mr. Bourez and Mr. Easton as a group, in the interest of efficiency. DWR attempts to assert this challenge as one based on lack of foundation, but no such objection could stand in the face of the express statement of the parties of

² If DWR intended to assert its Master Objections against the testimony of Messrs. Bourez and Easton, those objections should be overruled for all of the reasons stated in the Sacramento Valley Water Users’ Response to Department of Water Resources’ Master Objections.

1 the SVWU regarding the joint submittal. Even if DWR's footnote amounts to an evidentiary
2 objection, it should be overruled in its entirety.

3 **VI. CONCLUSION**

4 For the reasons outlined herein, and summarized above, the objections filed by SLDMWA
5 and assertions made by DWR regarding the testimony and exhibits of Messrs. Bourez and Easton
6 should be overruled in their entirety.

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DATED: October 19, 2016

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DATED: October 19, 2016

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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);

**SACRAMENTO VALLEY WATER USERS' RESPONSE TO OBJECTIONS TO
WRITTEN TESTIMONY AND EXHIBITS**

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 October 6, 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:

	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 October 19, 2016.

Signature: 

Name: Catharine Irvine

Title: Legal Secretary

Party/Affiliation: Downey Brand, LLP

Address: 621 Capitol Mall, Sacramento, CA 95814