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 8 DISTRICT; RECLAMATION DISTRICT 407,  
 RECLAMATION DISTRICT 2067,  
 9 RECLAMATION DISTRICT 317,  
 RECLAMATION DISTRICT 551,  
 10 RECLAMATION DISTRICT 563,  
 RECLAMATION DISTRICT 150,  
 11 RECLAMATION DISTRICT 2098,  
 RECLAMATION DISTRICT 800 (BYRON  
 12 TRACT)

13 BEFORE THE CALIFORNIA STATE WATER RESOURCES CONTROL BOARD  
 14

15  
 16 In the matter of Hearing re California  
 WaterFix Petition for Change  
 17

**JOINDER IN RESPONSE FILED BY  
 SACRAMENTO VALLEY WATER USERS  
 TO DEPARTMENT OF WATER  
 RESOURCES MASTER OBJECTIONS**

1 Brannan-Andrus Levee Maintenance District; Reclamation District 407, Reclamation  
2 District 2067, Reclamation District 317, Reclamation District 551, Reclamation District 563,  
3 Reclamation District 150, Reclamation District 2098, and Reclamation District 800 (Byron Tract)  
4 (collectively the "Delta Flood Control Group"), hereby join and incorporate in full by reference  
5 the response submitted by the Sacramento Valley Water Users ("SVWU") to the "Master  
6 Objections to Protestants' Cases-in-Chief Collectively" (Master Objection) filed by the California  
7 Department of Water Resources ("DWR").

8 Furthermore, to the extent that the Master Objection is asserting that any of the evidence  
9 submitted by the Delta Flood Control Group is outside the scope of Part 1, DWR has  
10 mischaracterized such evidence. All of the evidence submitted by the Delta Flood Control Group  
11 is relevant to the issue of whether the proposed changes will cause injury to legal users of water  
12 as outlined in the October 30, 2015 Hearing Notice. Even if any of the Delta Flood Control  
13 Group evidence discusses project funding or property damage due to project construction (issues  
14 that DWR asserts are outside the scope of Part 1), all such evidence discusses those issues in a  
15 manner that is relevant to one of the Part 1 issues and therefore not subject to exclusion.

16 For the foregoing reasons, the Delta Flood Control Group respectfully requests that  
17 DWR's Master Objections to Protestants' Cases-in-Chief Collectively be overruled in its entirety.  
18 In the alternative, if the SWRCB is inclined to grant DWR's request to exclude any Delta Flood  
19 Control Group evidence on the basis that it is outside the scope of Part 1, then the Delta Flood  
20 Control Group requests that the specific evidence be identified so that a further response can be  
21 made.

1 DATED: September 30, 2016

DOWNEY BRAND LLP

2  
3 By: 

4 DAVID R.E. ALADJEM

5 Attorney for Protestants  
6 BRANNAN-ANDRUS LEVEE MAINTENANCE  
7 DISTRICT; RECLAMATION DISTRICT 407,  
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DOWNEY BRAND LLP

**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);

**JOINDER IN RESPONSE FILED BY SACRAMENTO VALLEY WATER USERS  
TO DEPARTMENT OF WATER RESOURCES MASTER OBJECTIONS**

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 September 29, 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](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 <b>hard copy</b> 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:  <b>Method of Service:</b> _____
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I certify that the foregoing is true and correct and that this document was executed on September 30, 2016.

Signature: Catharine Irvine

Name: Catharine Irvine

Title: Legal Secretary

Party/Affiliation: Downey Brand, LLP

Address: 621 Capitol Mall, Sacramento, CA 95814