
State Water Resources Control Board

NOTICE OF OCTOBER 17, 2024 PRE-HEARING CONFERENCE AND PROCEDURAL RULING

The State Water Resources Control Board
Administrative Hearings Office will hold
a Pre-Hearing Conference in the proceeding on the pending Petitions for
Change of Water Right Permits 16478, 16479, 16481, and 16482
(Applications 5630, 14443, 14445A, and 17512, respectively) of the

Department of Water Resources.

The Pre-Hearing Conference will begin on

October 17, 2024, at 9:00 a.m.

and will be held by Zoom teleconference.

Representatives of parties and other people participating in the pre-hearing conference
may access the pre-hearing conference by using the following link and call-in
information:

Zoom teleconference (join link: bit.ly/aho-dcp-zoom)

Call-in number: 1-669-900-9128

Meeting ID: 969 6180 8415 (Passcode: 750159)

**Interested members of the public who would like to watch this conference without
participating may do so through the Administrative Hearings Office YouTube
channel at: bit.ly/aho-youtube**

LANGUAGE SERVICES AND ACCESSIBILITY

This pre-hearing conference will be offered in English. To request translation of a written
document, interpretation services for the conference, or sign language services, please
use one of the following options by **October 3, 2024**:

- Submit a [Language Services Request online](#)
- Call (916) 341-5254
- E-mail languageservices@waterboards.ca.gov

E. JOAQUIN ESQUIVEL, CHAIR | ERIC OPPENHEIMER, EXECUTIVE DIRECTOR

Users of a Telecommunications Device for the Deaf (TDD) may contact the California Relay Service at (800) 735-2929 or the teletype (TTY) voice line at (800) 735-2922.

BACKGROUND

As provided in the July 31, 2024 Notice of Public Hearing (July 31 Hearing Notice), the State Water Resources Control Board (State Water Board or Board) Administrative Hearings Office (AHO) will hold a public hearing on the proposed Delta Conveyance Project (DCP). The hearing will address the water right change petitions filed by the Department of Water Resources (DWR or Petitioner) to add two new points of diversion and rediversion to water right Permits 16478, 16479, 16481, and 16482 (DCP Change Petitions). The purpose of the hearing is to gather evidence to determine whether to approve these petitions and, if so, what specific terms and conditions should be included in DWR's amended permits for the State Water Project. A full description of the background of this proceeding is provided in the July 31 Hearing Notice and is incorporated here by reference.

The AHO conducted an initial pre-hearing conference on August 13, 2024, to discuss the pre-hearing and hearing schedule included in the July 31 Hearing Notice. Because the protest resolution period continues until November 12, 2024, and based on the discussion during the pre-hearing conference, the hearing officer vacated the September 5 deadline for submission of written comments on the hearing issues and November 4 deadline for parties to submit a Notice of Intent to Appear in the hearing. (2024-08-22 N. Kuenzi email to Service List.)

In a memorandum to the Division of Water Rights dated August 21, 2024, the Petitioner submitted a "Withdrawal of Petitions for Water Rights Extension of Time."¹ (2024-09-03 Joint Obj. to DWR Minor Change Req SJC et al. (September 3 Joint Objection), Exhibit B.) Petitioner thereby withdrew its two pending petitions for an extension of time to perfect its conditional water rights under Permits 16478, 16479, 16481, and 16482, and Permits 16477 and 16480, respectively. The Petitioner stated its intent to "submit a new petition for water rights extension of time in relation to the above-mentioned water rights permits in the near future." (*Ibid.*)

On August 23, 2024, Petitioner submitted to the hearing officer a "Minor Change to Department of Water Resources' Petitions for Change of Water Right Permits 16478, 16479, 16481, and 16482 (Applications 5630, 1443, 14445A, and 17512, respectively)" (August 23 Request). The August 23 Request proposes to amend the DCP Change Petitions under California Water Code section 1700.4 to modify Term 6 of the referenced permits and extend the permits' deadline for construction work. Term 6 currently reads "[c]onstruction work shall be completed on or before December 31,

¹ DWR did not send the memorandum to the Administrative Hearings Office as part of this proceeding, but the memorandum is now included in the administrative record for this proceeding as Exhibit B to the September 3 Joint Objection.

2000.” DWR seeks to modify this term to read, “[c]onstruction work shall be completed on or before December 31, 2055.” (2024-08-22 DCP_CPOD_Minor Amendment Letter_Term_6, p.1.) Petitioner asserts that a modified Term 6 is “implicit in the Petition as currently filed. The minor change merely makes express what is clearly intended in DWR’s request for two new points of diversion on the Sacramento River.” (*Ibid.*)

Protestants filed the following objections to Petitioner’s August 23 Request: County of Sacramento, Sacramento County Water Agency, City of Stockton, Sacramento Area Sewer District, Byron Bethany Irrigation District, Pescadero Reclamation District No. 2058, and Naglee Burk Irrigation District (August 27 Somach Objection); Central Delta Water Agency (August 30 CDWA Objection); California Water Impact Network (September 3 CWIN Objection); Buena Vista Rancheria of Me-Wuk Indians, Shingle Springs Band of Miwok Indians, Winnemem Wintu Tribe, Little Manila Rising, and Restore the Delta (September 3 Delta Tribal Environmental Coalition (DTEC) Objection); County of Sacramento, Sacramento County Water Agency, City of Stockton, Sacramento Area Sewer District, Byron Bethany Irrigation District, Pescadero Reclamation District No. 2058, Naglee Burk Irrigation District, CWIN, Center for Biological Diversity, County of Contra Costa and Contra Costa County Water Agency, County of Solano, Local Agencies of the North Delta, CDWA, County of San Joaquin , County of Yolo, Delta Legacy Communities Inc., The Willow Ballroom and Event Center, Friends of Stone Lakes National Wildlife Refuge, Golden State Salmon Association, San Francisco Baykeeper, South Delta Water Agency, Friends of the River, North Coast Rivers Alliance, Planning and Conservation League, Save California Salmon, Sierra Club California, Save Our Sandhill Cranes, Steamboat Resort (September 3 Joint Objection); and Hood Community Council (September 5 Hood Objection).

On August 30, Petitioner filed a response to the August 27 Somach Objection.

PROCEDURAL RULING

The hearing officer will hear argument from the parties during the pre-hearing conference on October 17 about legal and policy issues raised by DWR’s August 23 Request and withdrawal of its petitions for extension of time. Resolution of these questions may affect the scope of this hearing. The hearing officer intends to issue an amended notice of hearing or procedural ruling after the October 17 pre-hearing conference.

Because the hearing officer may revise the hearing issues after the October 17 pre-hearing conference, the December 4, 2024 deadline for submission of case-in-chief exhibits, exhibit identification indices, and proposed permit terms set by the July 31 Hearing Notice, is hereby **vacated**. The amended deadline for submission of case-in-chief exhibits and related documents will be no sooner than January 10, 2025.

OUTSTANDING PROCEDURAL ISSUES

Expired Deadline for Beneficial Use

The protestants’ written objections raise legal questions about the significance of the expiration of time for DWR to divert and beneficially use water as authorized under

water right Permits 16478, 16479, 16481, and 16482 (Subject Permits). I have not made any decision on this issue and intend to consider additional arguments from the parties on this matter that may be made during the pre-hearing conference on October 17 or in pre-hearing conference statements. To provide background and context, however, the following legal principles are generally applicable to water right permits issued by the State Water Board.

A water right permit issued by the State Water Board is a conditional right to appropriate water in accordance with the terms and conditions of the permit and other applicable provisions of law. An appropriation is made by the diversion and beneficial use of water. To the extent that water is applied to beneficial use in accordance with the permit, the right becomes perfected and is no longer conditional. An appropriative water right must be developed with due diligence. To effectuate this requirement, water right permits generally include a deadline for beginning and completing construction work necessary to the appropriation, and a deadline for applying water to beneficial use. Upon expiration of the deadline to apply water to beneficial use, the permittee retains the right to divert and use the amount of water perfected before the deadline, but the permittee is no longer authorized to divert water in excess of the perfected amount unless and until the Board approves a petition for extension of time. (See Wat. Code, §§ 1410, 1610.5, 1611.) The Board may extend the time allowed to beneficially use water under a water right permit upon a showing of good cause and demonstration that the permittee has exercised due diligence, and upon such conditions that the Board determines to be in the public interest. (Wat. Code, § 1398, subd. (a); Cal. Code Regs., tit. 23, § 844.)

Scope of this Proceeding on DWR's Petitions for Change

A permitted water right is not required to be perfected before the Board may consider a water right change petition. (See Wat. Code, §§ 1701.2-1704.) A proposed change to an application, permit, or license may not, however, effectively initiate a new right. (Cal. Code Regs., tit. 23, § 791, subd. (a).) Any approval of the DCP Change Petitions, absent a corresponding petition for extension of time, cannot extend the deadline for DWR to expand the amount of its beneficial use under the Subject Permits. Accordingly, DWR acknowledges that “by law, our existing water rights . . . are limited by maximum historical use until a State Water Project water right time extension petition is processed.” (August 23 Request, p. 1.)

DWR presumes that the Board will consider whether to grant an extension of time for beneficial use under the Subject Permits before the proposed DCP goes into operation; “[n]o water will be diverted through the requested new points of diversion in the petition until . . . after the State Water Resources Control Board addresses a State Water Project water right time extension petition through a separate and future process.” (August 23 Request, pp. 1-2.) DWR also states that it “will submit a new petition for water rights extension of time in relation to the above-mentioned water rights permits in the near future.” (September 3 Joint Objection, Exhibit B, p. 19.) In addition, DWR’s analysis of the effects of the proposed DCP operations in the Final Environmental Impact Report assumes that diversions under the Subject Permits would not be limited based on the amount of water used before the 2009 deadline to perfect those rights.

DWR proposes, however, that the State Water Board consider the DCP Change Petitions now, separate from the future-filed petitions for extension of time to complete beneficial use under the Subject Rights. This approach might be lawful but seems likely to cause inefficiencies and complexity by requiring the Board to conduct two proceedings when the underlying issues are significantly interrelated. This is particularly so given that DWR has presented the proposed project in the DCP Change Petitions and its environmental documents as a proposal to change the points of diversion and rediversion for the full face-value of the Subject Permits and has not limited its request to the amount of water used before the 2009 deadline to perfect those rights.

The purpose of the pre-hearing conference is, in part, to address how to appropriately frame the scope of this hearing on the DCP Change Petitions given DWR's expressed intent to file, "in the near future," petitions for extension of time to put to beneficial use the unperfected portions of the Subject Permits.

August 23 Request for Minor Change

The protestants object to DWR's August 23 Request on numerous grounds. Again, I have not made any final or recommended decision on this issue and intend to accept pre-hearing conference statements and hear from the parties during the pre-hearing conference on October 17. Based on my initial review of the objections and DWR's response, however, DWR's request appears to be procedurally flawed.

DWR cites Water Code section 1700.4 as authority for submitting a "minor change" to its petitions, but that section authorizes minor changes to water right applications, not change petitions. Likewise, Water Code section 1700.6 authorizes minor changes to permits and licenses, not change petitions. Regardless of whether Water Code section 1700.4, section 1700.6, or some other regulatory process would apply to a "minor" amendment to a pending petition for change, DWR seeks to change the deadline for construction of diversion facilities under the Subject Permits by 55 years. A 55-year extension of time does not, on its face, appear to be a "minor adjustment" or "not substantial." (Wat. Code, § 1700.6, subd. (a)(1); Wat. Code, § 1700.4, subd. (a)(3).)

The appropriate procedure for seeking an extension of a construction or beneficial use deadline in an existing permit is to file a petition for a time extension in accordance with Water Code section 1398 and section 844 of the State Water Board's regulations. In this case, DWR may not need an extension of time to construct facilities to exercise the portion of the Subject Permits that it has already perfected, and for which it now seeks to add points of diversion and rediversion. To my knowledge, the State Water Board has never required extension of a construction deadline for construction of infrastructure to effectuate a change in the perfected portion of a water right. With respect to the unperfected portion of the Subject Permits, an extension through this proceeding of the deadline for construction of additional facilities, without a companion extension of time to increase the amount of diversion and beneficial use, seems unnecessary and premature.

Closed Session Meeting of the State Water Board

The AHO received objections from DTEC (September 3 DTEC Objection) and parties represented by Somach Simmons & Dunn (September 3 Somach Objections to Closed Session) to the closed session held by the State Water Board on September 4, 2024, noticed in an August 23 Notice of Meeting in Closed Session, to deliberate on procedural or substantive decisions in this proceeding. Presumably these objections extend to other closed sessions held by the Board to deliberate on procedural or substantive decisions in this proceeding.

I have referred these objections to the Office of Chief Counsel, which office provides legal counsel to the State Water Board, for further opinion as to the requirements of the Bagley-Keene Open Meeting Act and the Administrative Procedure Act. It has been, however, the long-standing practice of the State Water Board to meet in closed session to deliberate on procedural or substantive decisions relevant to pending adjudicative proceedings, and legal precedent supports the validity of this practice. (See *Cooper v. Board of Medical Examiners* (1975) 49 Cal.App.3d 931, 948-49.) In addition, explicit provisions in the Administrative Procedure Act allow communication from State Water Board staff and representatives for the purpose of advising the presiding officer concerning non-prosecutorial adjudicative proceedings pending before the Board. (Gov. Code, §11430.30, subd. (c).) It is my understanding that the Office of Chief Counsel will issue a public memorandum addressing the objections in more detail.

OCTOBER 17, 2024 PRE-HEARING CONFERENCE

The hearing officer will hold a pre-hearing conference on **October 17, 2024**, as initially noticed in the July 31, 2024 Notice of Hearing. The July 31 Hearing Notice is available on the AHO webpage and includes information about how to participate in the pre-hearing conference. All parties intending to participate in the evidentiary portion of this hearing are strongly encouraged to participate in the pre-hearing conference.

The purpose of this pre-hearing conference is to address the following:

1. Whether the State Water Board should reject or accept Petitioner's August 23 Request to amend the DCP Change Petitions. If the Board accepts the request, what revisions should be made to the hearing issues?
2. Can and should the State Water Board consider the DCP Change Petitions separately from petitions for extension of time of the deadline to divert and beneficially use water under the Subject Permits?
 - a. If the Board separately considers the DCP Change Petitions, must the Board consider whether it should approve or deny the change petitions under all possible outcomes of the future-filed time extension petitions (i.e., if the Board were to approve, in full or in part, petitions for extension of time, and, also, if the Board were to deny petitions for extension of time)?

- b. If the Board separately considers the DCP Change Petitions, how should the Board condition any approval of the DCP Change Petitions to ensure that diversion or redirection of water through the proposed DCP is limited to the amount of water that DWR put to beneficial use by the 2009 deadline, unless and until the State Water Board approves petitions for extension of time for the Subject Permits?
3. Depending on resolution of the questions above and to address other concerns raised by the protestants during the August 13 pre-hearing conference, should the hearing officer stagger the deadline for submission of case-in-chief exhibits and case-in-chief hearing days, such that Petitioner will submit and present its case-in-chief before protestants submit and present their cases-in-chief?

All parties are encouraged to attend the pre-hearing conference. I request that any party who did not appear at the August 13 pre-hearing conference file a Notice of Intent to Appear at the October 17 pre-hearing conference. Anyone may request a copy of the Notice of Intent to Appear by e-mailing DCP-WR-Petition@waterboards.ca.gov.

Parties that wish to file pre-hearing conference statements with the AHO shall do so by **October 10, 2024**,² and serve copies of it on the other parties listed in the attached service list.

PRE-HEARING CONFERENCE LIVE-STREAM AND RECORDING

The pre-hearing conference will be live-streamed through the AHO's YouTube channel, accessible by clicking on the link provided below. After the conclusion of the pre-hearing conference, a recording of the YouTube live-stream session will be available on the AHO's YouTube channel. These recordings will include automatic captions for accessibility.

The live-stream and recordings may be accessed at the following link by clicking on "Live" and then clicking on the name of this proceeding: bit.ly/aho-youtube.

MORE INFORMATION

Frequently Asked Questions

For information about the AHO and general hearing procedures, refer to the AHO Frequently Asked Questions, available at bit.ly/aho-faq.

² Unless otherwise stated, the deadline for submission of documents is 11:59 p.m. on the date identified in this notice as the deadline.

E-mail List

Any interested person may sign up to receive communication related to this proceeding at bit.ly/swb-subscribe by selecting "Delta Conveyance Project Public Hearing" in the Administrative Hearings Office subscription topic group.



Date: September 17, 2024

Nicole L. Kuenzi
Presiding Hearing Officer
Administrative Hearings Office

Attachments:

- Attachment 1 - Service List

SERVICE LIST

Ann Carroll
Collin Chandler
Stefanie Morris
Department of Water Resources
Ann.Carroll@water.ca.gov
Collin.Chandler@water.ca.gov
smorris@calnevawaterlaw.com

Russell van Loben Sels
Amistad Ranches
revanlobensels@gmail.com

Michael E. Vergara
Louinda V. Lacey
Alyson E. Ackerman
Ellen M. Moskal
Jennifer Estabrook
Gloria Loomis
Yolanda De La Cruz
Pennie MacPherson
Somach Simmons & Dunn
mvergara@somachlaw.com
llacey@somachlaw.com
aackerman@somachlaw.com
emoskal@somachlaw.com
jestabrook@somachlaw.com
gloomis@somachlaw.com
ydelacruz@somachlaw.com
pmacpherson@somachlaw.com
Attorneys for Byron-Bethany Irrigation District

Chris Shutes
California Sportfishing Protection
Alliance (CSPA)
blancapaloma@msn.com

Barbara Vlamis
AquAlliance
barbarav@aqualliance.net

Michael Jackson
mjatty@sbcglobal.net
Attorney for CSPA and AquAlliance

David Fries
San Joaquin Audubon Society
dfries.audubon@gmail.com

Roger B. Moore
LAW OFFICE OF ROGER B. MOORE
rbm@landwater.com
Attorney for California Water Impact Network

Adam Keats
LAW OFFICE OF ADAM KEATS, PC
adam@keatslaw.org
Attorney for California Water Impact Network

S. Dean Ruiz
John Herrick
Dante J. Nomellini, Sr.
Dante J. Nomellini, Jr.
Mohan, Harris, Ruiz LLP
dean@mohanlaw.net
dean@sdeltawater.net
john@sdeltawater.net
ngmplcs@pacbell.net
dantejr@pacbell.net
brettgbaker@gmail.com
Attorneys for Central Delta Water Agency, South Delta Water Agency, Heritage Land Co., and Rudy Mussi Investment L.P.

Matthew Emerick
Law Offices of Matthew Emerick
matthew@mlelaw.com

Wes Miliband
Miliband Water Law
wes.miliband@mwaterlaw.com
Attorney for City of Sacramento

Kelley M. Taber
Louinda V. Lacey
Ellen M. Moskal
Gloria Loomis
Crystal Rivera
Pennie MacPherson
Somach Simmons & Dunn
ktaber@somachlaw.com
llacey@somachlaw.com
emoskal@somachlaw.com
gloomis@somachlaw.com
crivera@somachlaw.com
pmacpherson@somachlaw.com
Attorneys for the City of Stockton

Osha Meserve
Soluri Meserve, A Law Corporation
osha@semlawyers.com
legal@semlawyers.com
*Attorney for County of Contra Costa,
Contra Costa County Water Agency,
David J. Elliot & Sons/Stillwater
Orchards, Frank Loretz, Friends of
Stone Lakes National Wildlife Refuge,
Local Agencies of the North Delta,
County of San Joaquin, and County of
Solano*

Protestant County of San Joaquin
Kirnpreet Kaur Virk
Deputy County Counsel
Office of the County Counsel
County of San Joaquin
kvirk@sjgov.org

Thomas H. Keeling
Freeman Firm
tkeeling@freemanfirm.com
Attorney for San Joaquin County

Jennifer Spaletta
STOEL RIVES LLP
500 Capitol Mall, Suite 1600
Sacramento, CA 95814
jennifer.spaletta@stoel.com

Protestant County of Contra Costa and
the Contra Costa County Water Agency
Contra Costa County
Contra Costa County Water Agency
c/o Ryan Hernandez
Department of Conservation and
Development
Ryan.Hernandez@dcd.cccounty.us

Thomas L. Geiger, County Counsel
Stephen M. Siproth, Assistant County
Counsel
Contra Costa County Counsel's Office
Stephen.Siproth@cc.cccounty.us

Protestant County of Solano
Bernadette Curry, County Counsel
Holly E. Tokar, Deputy County Counsel
Solano County
BSCurry@SolanoCounty.com
HETokar@SolanoCounty.com

Dan Whaley
Delta Legacy Communities Inc.
Whaley500@yahoo.com

Dan Muelrath
Diablo Water District
dmuelrath@diablowater.org

Deirdre Des Jardins
ddj@cah2oresearch.com

Jon Salmon
East Bay Municipal Utility District
Jon.salmon@ebmud.com

Robert E. Donlan
Ellison, Schneider, Harris & Donlan LLP
red@eslawfirm.com
kwb@eslawfirm.com
*Attorney for East Contra Costa Irrigation
District*

Brian Poulsen
Rachel Sarge
El Dorado Irrigation District
bpoulsen@eid.org
rsarge@eid.org

Amber McDowell
Farm Bureau Delta Caucus
Sacramento County Farm Bureau
executivedirector@sacfarmbureau.org

Michael A. Brodsky
Law Offices of Michael A. Brodsky
michael@brodskylaw.net
*Attorney for Hood Community Council
and Save the California Delta Alliance*

Alexis K. Stevens
Ellen M. Moskal
Crystal Rivera
Pennie MacPherson
Somach Simmons & Dunn
astevens@somachlaw.com
emoskal@somachlaw.com
crivera@somachlaw.com
pmacpherson@somachlaw.com
*Attorneys for Naglee Burk Irrigation
District and Pescadero Reclamation
District No. 2058*

Kevin O'Brien
Brian Hamilton
Austin Cho
Downey Brand LLP
bhamilton@downeybrand.com
acho@downeybrand.com
dfillon@downeybrand.com
kobrien@downeybrand.com
*Attorneys for North Delta Water Agency
and associated Reclamation Districts*

Philip J. Pogledich
County of Yolo
Philip.pogledich@yolocounty.org

Kelley M. Taber
Louinda V. Lacey
Gloria Loomis
Crystal Rivera
Pennie MacPherson
Somach Simmons & Dunn, PC
ktaber@somachlaw.com
llacey@somachlaw.com
gloomis@somachlaw.com
crivera@somachlaw.com
pmacpherson@somachlaw.com
*Attorneys for Sacramento Area Sewer
District, Sacramento County, and
Sacramento County Water Agency*

E. Robert Wright
Erin Woolley
Sierra Club California
bwrightatty@gmail.com
erin.woolley@sierraclub.org

John Buse
Center for Biological Diversity
jbuse@biologicaldiversity.org

Jann Dorman
Keiko Mertz
Friends of the River
janndorman@friendsoftheriver.org
keiko@friendsoftheriver.org

Howard Penn
Planning and Conservation League
howard@pcl.org

Regina Chichizola
Save California Salmon
regina@californiasalmon.org

Emily Pappalardo
DCC Engineering Co., Inc
Epappalardo@dcceng.net
Representative for Steamboat Resort

Eric Buescher
San Francisco Baykeeper
eric@baykeeper.org

Stephanie Safdi
Terra Baer
Naji Thompson
Stephanie Prufer
Thomas Peterson
Environmental Justice Law and
Advocacy Clinic, Yale Law School
stephanie.safdi@ylsclinics.org
terra.baer@ylsclinics.org
naji.thompson@ylsclinics.org
stephanie.prufer@ylsclinics.org
thomas.peterson@ylsclinics.org

Charles Center
Camp Lotus
charlesmcenter@gmail.com

Scott Armstrong
All-Outdoors California Whitewater
Rafting
scott@aorafting.com

Isaac Ingram
American River Touring Association
isaac@arta.org

Theresa Lorejo-Simsiman
American Whitewater
theresa@americanwhitewater.org

Keith Miller
California Canoe and Kayak
cckjefe@gmail.com

Nathan Rangel
California Outdoors
nathanjrangel@gmail.com

Brian Jobson
Foothill Conservancy
jobsonbrian@hotmail.com

Scott Underwood
Mother Lode River Center
scott@malode.com

Clavey Wendt
OARS California Rafting (OARS)
claveywendt@gmail.com

Kevin Wolf
Restoring the Stanislaus River
kevinjwolf@gmail.com

Dan Kelly
Elise M. Nelson
Placer County Water Agency
dkelly@pcwa.net
enelson@pcwa.net

Marty McDonnell
Sierra Mac River Trips
marty@sierramac.com

Aaron Zettler-Mann
South Yuba River Citizens League
(SYRCL)
aaron@yubariver.org

Patrick Koepele
Tuolumne River Trust
patrick@tuolumne.org

Stephen Smallcombe
Upper Merced River Watershed Council
kristinarylands@gmail.com

Sean Wirth
ECOS/Habitat 2020
office@ecosacramento.net

Barbara Barrigan-Parrilla
Cintia Cortez
Restore the Delta
barbara@restorethedelta.org
cintia@restorethedelta.org

Sherri Norris
California Indian Environmental Alliance
sherri@cieaweb.org

Rebecca L. Harms
San Luis & Delta-Mendota Water
Authority
Rebecca.Harms@sldmwa.org

Glen Spain
Pacific Coast Federation of Fishermen's
Associations (PCFFA) and Institute for
Fisheries Resources (IFR)
fish1ifr@aol.com

Scott Slater
Elisabeth Esposito
Benjamin Markham
Brownstein Hyatt Farber Schreck, LLP
sslater@bhfs.com
eesposito@bhfs.com
bmarkham@bhfs.com
Attorneys for Westlands Water District

Allison Febbo
Westlands Water District
afebbo@wwd.ca.gov

Mike Savino
Save our Sandhill Cranes
yogoombah@yahoo.com

INITIAL SERVICE LIST (CONT'D)

Interested Persons

Adam Nickels
Ray Sahlberg
United States Department of Interior
Bureau of Reclamation
anickels@usbr.gov
rsahlberg@usbr.gov

Yvonne Perkins
Tribal Historic Preservation Officer
YD0122202005
Yocha Dehe Wintun Nation
THPO@yochadehe.gov

Miles Krieger
Best Best & Krieger
Miles.Krieger@bbklaw.com
heather.mccoy@bbklaw.com
Attorney for State Water Contractors

Janet Lake
Freeport Citizens Community (FCC)
riverscitybrand@gmail.com