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6 *Attorneys for Protestant Restore the Delta*

7
8 **BEFORE THE**
9 **CALIFORNIA STATE WATER RESOURCES CONTROL BOARD**

10
11 HEARING IN THE MATTER OF
12 CALIFORNIA DEPARTMENT OF WATER
13 RESOURCES AND UNITED STATES
14 BUREAU OF RECLAMATION REQUEST
FOR A CHANGE IN POINT OF DIVERSION
FOR CALIFORNIA WATERFIX

DECLARATION OF SUBASH SIL

1 I, SUBASH SIL, declare as follows:

2 1. I am an adult over the age of eighteen. I have personal knowledge of all the facts
3 contained in this declaration, except those stated on information and belief. As to those statements
4 based on information and belief, I believe them to be true. If called to testify, I would and could
5 completely and truthfully testify as to the statements contained herein.

6 2. I am co-owner of TAPS Bar and Grill, a sports bar in downtown Stockton. Its address
7 is 222 N El Dorado St, Stockton, CA 95202.

8 3. At this time, TAPS Bar and Grill, showcases a unique an innovative beer tap system
9 pioneered by eBeer.

10 4. eBeer's tap systems enable restaurants to provide patrons with self-serve beer tap
11 access combined with a payment system. This enables restaurants to dispense beer through either
12 table taps or at common table locations.

13 5. Because the eBeer technology governs and facilitates fluid control, other types of
14 beverages such as carbonated soft drinks can also be delivered directly to patrons' tables. This
15 facilitates the design of interactive environments within bars, restaurants, and other types of
16 entertainment venues.

17 6. eBeer is looking at developing methods for adapting the technology to catering
18 business.

19 7. eBeer is an engineering company headquartered in Girona, Spain. It was founded in
20 2004 to take advantage of development and sale of automatic, precision controlled irrigation systems
21 for use in the Priorat (a famous Spanish high-quality wine-producing region in Cataluña). This
22 irrigation system was developed at the behest of the Government of Cataluña's water resources
23 management division.

24 8. eBeer expanded into production of beer tap systems used now in 15 countries.

25 9. I am very concerned that if the Petition Facilities are constructed and operated, Delta
26 water quality near downtown Stockton will be diminished.

27 10. Currently, the water hyacinth problem causes a bad odor in the entire area and a
28 horrendous eyesore.

1 11. I am concerned that if the tunnels go through it will make doing business and
2 attracting new investors to our eBeer technology at TAPS Bar & Grill impossible.

3 12. We chose the downtown Stockton area because of the location near the amenities
4 provided by the Delta and the potential to bring in interested clients from other parts of the country
5 and the rest of the world. I am concerned that if the area becomes constantly infested with hyacinth,
6 the area would become unbearable.

7 13. I am also concerned with Delta water quality because TAPS Bar & Grill also supports
8 local farmers and primarily buys locally the foods we sell. If local farmers are affected by the
9 tunnels, then so will our business be affected, since local purchases would be reduced and our prices
10 will go up. We would have to pass the higher cost for local food on to our customers. Any loss of
11 agricultural jobs would directly reduce the size of our customer base at TAPS as well.

12 I declare under penalty of perjury under the laws of the United States of America that the
13 foregoing is true and correct. Executed this 29 day of August, 2016, at Stockton,
14 California.

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SUBASH SIL

1 **STATEMENT OF SERVICE**

2 **CALIFORNIA WATERFIX PETITION HEARING**
3 **Department of Water Resources and U.S. Bureau of Reclamation (Petitioners)**

4 I hereby certify that I have this day submitted to the State Water Resources Control Board
5 and caused a true and correct copy of the following document(s):

6 **[title]**

7 to be served **by Electronic Mail** (email) upon the parties listed in Table 1 of the **Current Service**
8 **List** for the California WaterFix Petition Hearing, dated August 8, 2016, posted by the State Water
9 Resources Control Board at [http://www.waterboards.ca.gov/waterrights/water_issues/programs/
10 bay_delta/california_waterfix/service_list.shtml](http://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/california_waterfix/service_list.shtml)

11 I certify that the foregoing is true and correct and that this document was executed on
12 August ____, 2016.

13 Signature: _____

14 Name: John W. Wall

15 Title: Litigation Assistant

16 Party/Affiliation: Protestant, Restore the Delta

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