

1 ELLISON, SCHNEIDER & HARRIS L.L.P.
2 Anne J. Schneider, Esq. (Bar No. 72552)
3 2015 H Street
4 Sacramento, California 95814-3109
5 Telephone: (916) 447-2166
6 Facsimile: (916) 447-3512

7
8
9
10
11
12 SPECIAL REFEREE

13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN BERNARDINO, RANCHO CUCAMONGA DIVISION

12 CHINO BASIN MUNICIPAL WATER
13 DISTRICT,

14 Plaintiff,

15 v.

17 THE CITY OF CHINO, et al.

18 Defendants.

CASE NO. RCV 51010

Judge: Honorable J. Michael Gumm

SPECIAL REFEREE'S COMMENTS
AND RECOMMENDATIONS
CONCERNING MOTION FOR
APPROVAL OF WATERMASTER'S
LONG TERM PLAN FOR
MANAGEMENT OF SUBSIDENCE

Date: November 15, 2007
Time: 1:30 p.m.
Dept: 8

21 I.

22 INTRODUCTION

23
24 This is an adjudication of groundwater rights in the Chino Basin. A stipulated judgment
25 was entered on January 30, 1978 ("Judgment"). Pursuant to the mandate in Article X Section 2
26 of the California Constitution, that all water be put to reasonable and beneficial use, the Court
27 adopted, and ordered the parties to comply with, a Physical Solution. (Judgment, ¶ 39, p. 23.)
28 Continuing jurisdiction was reserved to the Court "to make such further or supplemental orders

1 or directions as may be necessary or appropriate for interpretation, enforcement or carrying out
2 of this Judgment, and to modify, amend or amplify any of the provisions of this Judgment.”
3 (Judgment, ¶ 15, p. 12.) The Judgment also provides that all actions, decisions or rules of
4 Watermaster are subject to review by the Court on its own motion, or upon motion by any party,
5 Watermaster, the Advisory Committee, or any Pool Committee. (Judgment, ¶ 31, p. 16.)

6 The Judgment appointed a Watermaster “to administer and enforce the provisions of this
7 Judgment and any subsequent instructions or orders of the Court hereunder.” (Judgment,
8 paragraph 16, p. 12.) “The Watermaster operates on the one hand as an administrator and on the
9 other hand as an extension of the court. When functioning as an extension of the court the
10 Watermaster acts as a steward of the groundwater resources in the Chino Basin.” (Ruling, dated
11 February 19, 1998, p. 2-3.) Watermaster has filed a motion, under paragraph 31 of the
12 Judgment, requesting the Court to review and approve its recent action adopting a long-term
13 management plan for controlling subsidence in Management Zone 1 of Chino Basin (“MZ-1”).
14 The issue of subsidence in MZ-1 was first raised in connection with Watermaster’s development
15 of an optimum basin management program for Chino Basin under paragraph 41 of the Judgment.

16 II.

17 CHRONOLOGY OF SUBSIDENCE ISSUE

18 A. Adoption of OBMP

19 In February 1998, the Court ordered Watermaster to develop an optimum basin
20 management program for Chino Basin, and to submit it first to the Advisory Committee and then
21 to the Court. (Ruling, dated February 19, 1998, p. 10.) The Court approved the optimum basin
22 management program for Chino Basin (“OBMP”) on July 13, 2000. The Court found “the
23 OBMP consists of the OBMP Phase I Report and the OBMP Implementation Plan.” The Court
24 directed Watermaster to “adopt the goals and plans of the Phase I Report and implement them
25 through the Implementation Plan....” The Court further directed Watermaster to “proceed in a
26 manner consistent with the Peace Agreement and the OBMP Implementation Plan.” (Order
27 Concerning Adoption of OBMP, dated July 13, 2000, p. 5.)

28 ////

1 OBMP Implementation Plan Program Element 4 is to develop a long-term management
2 plan to reduce or abate the subsidence and fissuring problems in MZ-1:

3 The occurrence of subsidence and fissuring in Management Zone 1 is not
4 acceptable and should be reduced to tolerable levels or abated. The OBMP calls
5 for a management plan to reduce or abate the subsidence and fissuring problems
6 to the extent that it may be caused by production in MZ-1. There is some
7 uncertainty as to the causes of subsidence and fissuring and more information is
8 necessary to distinguish among potential causes. Therefore an interim
9 management plan will be developed to minimize subsidence and fissuring while
10 new information is collected to assess the causes and to develop an effective long-
11 term management plan.

12 (Peace Agreement, Exhibit B, [OBMP Implementation Plan] p. 26.)

13 **B. 2001 Court Orders**

14 In response to a petition for writ of mandate filed by City of Chino Hills against City of
15 Chino and a request that the matter be assigned to Honorable J. Michael Gunn, on December 19,
16 2001, the court issued two orders. The first order, signed by Honorable Joseph E. Johnston,
17 Supervising Civil Judge, construed the writ petition as encompassing two separate matters: a
18 mandamus proceeding brought under Public Utility Code sections 10101 through 10107 and a
19 motion brought under Paragraph 15 of the Judgment herein. The mandamus proceeding was
20 given case number RCV 59670 and was not assigned to Judge Gunn. The second matter, the
21 motion under Paragraph 15 of the Judgment, was deemed to be part of the ongoing proceedings
22 in this case (RCV 51010).

23 The second order, signed by Honorable J. Michael Gunn, required all parties to the
24 Judgment to appear on February 28, 2002, "to report on the status of the technical work
25 performed to date by Watermaster and others concerning subsidence and related issues." In
26 response to that order, Watermaster filed a Report of Activities Regarding Subsidence and a
27 Request for Finding and Further Order, dated January 29, 2002, and a Declaration of Mark
28 Wildermuth, dated January 30, 2002. City of Chino filed a Response of the City of Chino to the
Court's Order for Information, and Motion Pursuant to Paragraph 15 of the Judgment, dated
January 31, 2002, which included several exhibits, and the City of Chino Subsidence Study.¹

¹ This on-going matter has been continued annually by City of Chino. The most recent continuance was for six months, to February 15, 2008.

1 Monte Vista Water District filed a Motion to Strike Portions of City of Chino's [Purported]
2 Motion Pursuant to Paragraph 15 of the Judgment, dated February 14, 2002. On February 15,
3 2002, Watermaster filed a Motion for Continuance and Related Order on City of Chino Motion
4 and Subsequent Oppositions; Suggested Future Scheduling. City of Chino Hills filed an
5 Objection to the City of Chino Motion Pursuant to Paragraph 15 of the Judgment; Joinder, etc.,
6 dated February 18, 2002. City of Chino filed a Response to Monte Vista's Motion to Strike,
7 dated February 22, 2002. Watermaster filed a Report of Joinders to Watermaster's February 15,
8 2002 Motion for Continuance. On February 25, 2002, the Special Referee filed a Special
9 Referee's Report and Recommendation Concerning Motions Filed Related to Subsidence,
10 acknowledging the need for additional data related to subsidence.

11 C. 2002 Court Orders

12 On February 28, 2002, the court continued the hearing on the technical reports and
13 motions concerning subsidence stating "Watermaster shall convene the regularly scheduled
14 stakeholder process that has been agreed upon by the majority of the parties and report back to
15 the court by May 1, 2002, on any consensus that has been achieved on how best to further
16 implement OBMP Program Element 4." (Order Receiving Supplemental Desalter Report,
17 Supplemental OBMP Report, 24th Annual Report, and Initial State of Basin Report; Order
18 Continuing Hearing on Subsidence, dated February 28, 2002, p. 5.)

19 On June 17, 2002, Watermaster filed an Ex Parte Application for an Order Shortening
20 Time for the Transmittal of Subsidence Interim Plan and Motion to Schedule Workshop. Also
21 on June 17, 2002, Watermaster filed a Transmittal of Subsidence Interim Plan and Motion to
22 Schedule Workshop; Transmittal of ISOB. Exhibit "1" to the Transmittal is the Proposed
23 Watermaster Interim Plan for Management of Subsidence, which includes exhibits "A" through
24 "F."

25 Pursuant to the Court's June 19, 2002 Order, a workshop was held on August 29, 2002,
26 "for Watermaster to present to the Court, through the Special Referee, the details of the Interim
27 Plan [Proposed Watermaster Interim Plan for Management of Subsidence]." (*Id.*, at p. 2.) The
28 Special Referee's Report on Interim Plan Workshop and Recommendation Concerning

1 Subsidence Issues, dated September 17, 2002, was filed with the Court. Thereafter, Watermaster
2 Comments to Referee Report on Interim Plan and Motion for an Order to Proceed in Accordance
3 with the Interim Plan was filed with the Court. Attached to Watermaster's Comments and
4 Motion were two exhibits: Exhibit "A" is the Revised Interim Plan for the Management of
5 Subsidence. Exhibit "B" is the MZ-1 Interim Plan Monitoring Program Draft Work Plan. In
6 October 2002, the Court directed Watermaster to, among other things,

- 7 1) Implement the Interim Plan Monitoring Program for subsidence,
8 including all work related to the installation and monitoring of
9 piezometers and extensometers, ground level monitoring, aquifer
10 testing, and all such other actions required to study, analyze, and
11 interpret subsidence and fissuring phenomena in MZ-1, and to
12 determine causes in sufficient detail that they can be managed through a
13 long-term plan.
- 14 2) Continue to work with the MZ-1 Technical Committee to obtain
15 comments and recommendations on the scope, area of investigation,
16 and approach to the monitoring program, in furtherance of the objective
17 of having the Technical Committee serve in an advisory capacity to
18 assist Watermaster in the development of a long-term management plan
19 for subsidence in MZ-1.
- 20 3) Schedule a follow-up workshop for July 17, 2003, to present to the
21 Court through the Special Referee the progress made on
22 implementation of the Interim Plan.

23 (Order Concerning Watermaster's Interim Plan for Management of Subsidence, dated October
24 17, 2002, p. 10.)

25 **D. 2005 Workshop**

26 At the request of Watermaster, the Court allowed the workshop that was to be scheduled
27 for July 17, 2003, to be scheduled at a later date to permit more time for monitoring. (Order
28 Granting Motion to Continue July 17, 2003 Workshop Re MZ-1 Interim Subsidence Plan, dated
July 16, 2003; Order Receiving Watermaster's Status Reports Nos. 7 & 8; Order Continuing
Workshop on Interim Plan for Management of Subsidence, dated October 30, 2003.)

The Special Referee held the workshop on May 25, 2005. "The scope of the workshop
was limited to presentation of technical data and analysis completed to date related to [the
Interim Plan].... The presentation was made by Mr. Malone of Wildermuth Environmental, Inc.,
Watermaster Engineering Consultant." (Sp. Ref. Report on Progress Made on Implementation of
the Watermaster Interim Plan for Management of Subsidence, dated June 16, 2005, p. 1.) The

1 Special Referee concluded: "The workshop was very productive. Mr. Malone's presentation
2 was excellent. The Watermaster does not require court approval to direct the preparation of a
3 summary report on the MZ-1 technical work or to issue guidance criteria. The Watermaster,
4 however, should file with the court a motion for an order to set a schedule for the completion of a
5 long-term plan." (*Id.* at p. 9.) ²

6 In February 2007, the Court ordered Watermaster to file a report on the status of
7 Watermaster's long-term plan for MZ-1 and the publication of guidance criteria. (Order Re:
8 Receiving OBMP Status Reports and Annual Reports and Further Action, dated February 16,
9 2007, p. 4.) Subsequently, the Court ordered Watermaster to submit a motion for court approval
10 of a long-term plan for MZ-1. (Order Concerning OBMP Status Report 2006-02, Future
11 Desalting Plans, and MZ-1 Long-Term Plan, dated May 24, 2007, p. 3.)

12 III.

13 WATERMASTER'S MOTION FOR APPROVAL OF LONG -TERM PLAN FOR 14 MANAGEMENT OF SUBSIDENCE

15 16 A. Watermaster's Motion

17 On August 2, 2007, Watermaster filed a Notice of Motion for Approval of Watermaster's
18 Long Term Plan for the Management of Subsidence; Points and Authorities in Support of Motion
19 for Approval of Watermaster's Long Term Plan for the Management of Subsidence; Exhibits and
20 Declaration Thereof. Attached to Watermaster's Points and Authorities are Exhibits "A"
21 through "K": Exhibit "A," consisting of the Long Term Plan, April 2006 Watermaster Staff
22 Report, February 2006 Wildermuth Environmental, Inc. Management Zone 1 Interim Monitoring
23 Program/MZ-1 Summary Report (prepared for MZ-1 Technical Committee), and Special
24 Referee's Report on Progress Made On Implementation of the Watermaster Interim Plan for
25 Management of Subsidence; Exhibit "B," consisting of Minutes for Joint Appropriative and
26 Non-Agricultural Pool meeting on March 9, 2006; Exhibit "C," consisting of Minutes for Joint

27 ² Watermaster filed the summary report and guidance criteria with the Court as part of its Motion for
28 Approval of Long-Term Plan for Management of Subsidence. (See Appendix "A" to Exhibit "A" of the motion.)

1 Appropriate and Non-Agricultural Pool meeting on April 13, 2006; Exhibit "D," consisting of
2 Minutes for Chino Basin Advisory Committee Meeting on April 27, 2006; Exhibit "E,"
3 consisting of Minutes for Chino Basin Watermaster Board Meeting on April 27, 2006; Exhibit
4 "F," consisting of Minutes for Chino Basin Watermaster Board Meeting on May 25, 2006;
5 Exhibit "G," consisting of a letter from Hatch and Parent to Mark Hensley of Jenkins & Hogen,
6 dated July 28, 2006, and proof of delivery of said letter; Exhibit "H," consisting of a June 28,
7 2007 Watermaster Staff Report; Exhibit "I," consisting of Minutes for Chino Basin Watermaster
8 Board Meeting on June 28, 2007; Exhibit "J," consisting of a memorandum from Wildermuth
9 Environmental, Inc. to Watermaster, dated April 4, 2007; Exhibit "K," consisting of a
10 Declaration by Sheri Rojo, CPA, summarizing Watermaster expenditures since July 2000,
11 related to subsidence management

12 Watermaster's motion is brought under paragraph 31 of the Judgment, which provides for de
13 novo review by the Court of all actions, decisions, or rules of Watermaster. "Watermaster's
14 finding or decision, if any, may be received in evidence at said hearing, but shall not constitute
15 presumptive or prima facie proof of any fact in issue." (Judgment, paragraph 31(d), p. 17.)
16 Because this is a motion under paragraph 31 of the Judgment, production of evidence is
17 required.³

18 Watermaster requests that the Court make the following findings:

- 19 1. The OBMP requires Watermaster to address subsidence in the Chino
20 Basin, but it does not specify particular actions to be taken.
- 21 2. The Interim Plan has successfully addressed subsidence on a short-term
22 basis.
- 23 3. The Long Term Plan proposes a reasonable approach to the issue of
24 subsidence on a long-term basis.
- 25 4. The Long Term Plan is consistent with the Judgment, the OBMP and
26 the Peace Agreement.
- 27 5. The Long Term Plan does not trigger the reimbursement provision of
28 section 5.4 (e) of the Peace Agreement.

(Watermaster Points and Authorities, p. 16-17.)

³ Evidence Code section 1401 requires authentication of a writing before it is received in evidence. No authentication was provided initially for Exhibits "A" through "J." Watermaster's subsequent filing includes a Declaration by Sherri Lynne Molino.

1 **B. Subsequent filings and Orders on Ex Parte Motions**

2 On August 24, 2007, City of Chino Hills filed an Ex Parte Application to Continue the
3 Hearing on Watermaster's Motion for Approval of Long Term Plan. Also on August 24, 2007,
4 Watermaster filed a Response to Chino Hills' Ex Parte Motion. On August 27, 2007, the Court
5 ordered a continuance of the hearing on Watermaster's Motion for Approval of Long Term Plan
6 to November 15, 2007. The Court also requested Watermaster to schedule a Special Referee
7 workshop on October 3, 2007, "to receive evidence on the issue whether or not Watermaster's
8 proposed long-term plan for the management of subsidence, is a reasonable long-term approach
9 to the issue of subsidence in MZ-1." (Order on Ex Parte Application for Continuance of Hearing
10 on Motion for Approval of Long Term Plan for Subsidence in MZ-1, dated August 27, 2007, p.1-
11 2.)

12 On September 18, 2007, City of Chino Hills filed Evidentiary Objections to
13 Watermaster's Motion and attached Exhibits "A" through "J." On September 25, 2007, City of
14 Chino Hills filed a Transmittal of Dennis Williams' Comments on Watermaster's Long Term
15 Plan. On October 2, 2007, Watermaster filed a Request to Cancel October 3, 2007 Special
16 Referee Workshop. Attached to the pleading, as Exhibit "A", is a Stipulation Re Long Term
17 Plan for Management Zone Number One (MZ-1) between Watermaster and City of Chino Hills.
18 The stipulation provides in part that "City of Chino Hills will withdraw its opposition to
19 Watermaster's request for approval of the Long Term Plan ...and Watermaster will amend its
20 motion...to delete a request for any findings regarding the appropriateness of available credits
21 arising under Watermaster Rules and Regulations Section 4.5 or 5.4 of the Peace Agreement."
22 By order dated October 2, 2007, the workshop was cancelled. Because the Special Referee and
23 Technical Expert had questions concerning the long-term plan and to expedite the evaluation of
24 the plan, an informal technical meeting took place at Watermaster's office on October 3, 2007,
25 instead of the formal workshop. The meeting was attended by Special Referee Anne Schneider,
26 Technical Expert Joe Scalmanini and experts from City of Chino Hills, City of Chino, the State
27 of California, and Watermaster.

28 ////

1 **C. Supplemental Filings**

2 On October 11, 2007, Watermaster filed a Supplemental Filing Re Subsidence Long-
3 Term Plan. Attached to the Supplemental Filing, as Exhibit “B”, is a Declaration by Sherri
4 Lynne Molino and a revised long term plan for management of subsidence [Chino Basin
5 Optimum Basin Management Program Management Zone 1 Subsidence Management Plan dated
6 October 2007] (“Long Term Plan”). Also attached to the Supplemental Filing, as Exhibit “A,” is
7 the Stipulation Re Long Term Plan for Management Zone Number One (MZ-1) between
8 Watermaster and City of Chino Hills (“Stipulation”), which was first filed with the Court on
9 October 2, 2007. As noted earlier, the stipulation provides in part that “City of Chino Hills will
10 withdraw its opposition to Watermaster’s request for approval of the Long Term Plan ...and
11 Watermaster will amend its motion...to delete a request for any findings regarding the
12 appropriateness of available credits arising under Watermaster Rules and Regulations Section 4.5
13 or 5.4 of the Peace Agreement.” The Supplemental Filing states that Watermaster is
14 withdrawing its request for Finding No. 5. City of Chino Hills has not filed any supplemental
15 pleadings. Watermaster contends the Stipulation itself is sufficient to withdraw City of Chino
16 Hills’ opposition to its motion.

17 **IV.**

18 **COMMENTS ON WATERMASTER’S LONG-TERM PLAN FOR MZ-1 AND THE**
19 **PUBLICATION OF GUIDANCE CRITERIA**

20 **A. Revised Watermaster Long Term Plan**

21 As noted, above, Watermaster transmitted a revised Long Term Plan to the Court as Exhibit
22 “B” to its October 11, 2007 Supplemental Filing, which revised the Long Term Plan submitted
23 as Exhibit “A” to its August 2, 2007 motion. The Long Term Plan was revised to incorporate
24 elements of the Stipulation. The revisions also clarified the status of groundwater flow and
25 subsidence modeling, and added that further investigation of the potential effects of pumping in
26 the central and northern portions of MZ-1 may include additional monitoring, construction of
27 additional extensometers and peizometers, and groundwater flow and subsidence modeling.

28 (Long Term Plan, p.2-6)

1 The Long Term Plan is an extension of Watermaster's Interim Plan. Watermaster formulated
2 and implemented the Interim Monitoring Program to focus on cause-and-effect relationships
3 with regard to subsidence in southwestern MZ-1. The results of that Program were documented
4 in February 2006, in the "Management Zone 1 Interim Monitoring Program MZ-1 Summary
5 Report" which, among other details, included a Guidance Level (groundwater level in a specific
6 peizometer at Watermaster's Ayala Park peizometer and extensometer monitoring location) for
7 recommended maintenance of groundwater levels to minimize the risk of permanent subsidence
8 and ground fissuring while the long term plan was being developed. Watermaster also initiated
9 the collection of pertinent groundwater level and ground surface elevation data in other areas in
10 and adjacent to MZ-1.

11 The Long Term Plan seeks to continue the approach of the Interim Monitoring Program of
12 voluntary management of pumping in southwest MZ-1 (the Subsidence Management Area) in
13 order to implement groundwater level management above the Guidance Level determined via the
14 Interim Monitoring Program efforts. Except for purposeful lowering of groundwater levels as
15 part of the Interim Monitoring Program to ultimately derive input to the Guidance Level, the
16 achievement of elastic aquifer-system deformation appears to derive from the reduction of
17 pumping as part of the Interim Program, and associated maintenance of groundwater levels
18 sufficiently high to be above the Guidance Level.

19 The Long Term Plan also commits to continued monitoring and interpretation of data in and
20 around the southwest MZ-1 area in order to adaptively adjust the Guidance Level and/or expand
21 the Subsidence Management Area as appropriate into Central and Northern MZ-1, or other areas
22 of subsidence concern. The Long Term Plan commits to consider an injection feasibility study to
23 help determine if aquifer injection is a viable tool to manage subsidence, to design an
24 investigation in northern and central MZ-1 to address whether pumping in those areas has a
25 material impact on subsidence, to provide Watermaster assistance in designing pumping plans to
26 further refine the Guidance Level, and to cooperate with Chino Hills to evaluate the best
27 available options for Chino Hills (presumably in coordination with other well owners) to produce
28 a reasonable quantity of groundwater from MZ-1, with ultimate recognition of the physical

1 limitations within MZ-1. Pumping plans will be designed to purposefully maintain groundwater
2 levels above the Guidance Level. Finally, the Long Term Plan commits to ongoing monitoring,
3 interpretation, evaluation, and annual reporting to verify the protective nature of the plan as
4 related to permanent land subsidence and ground fissuring.

5 The Long Term Plan is stated to be an “adaptive” plan:

6 A key element of the MZ-1 [Long Term] Plan is its *adaptive* nature. As new data are
7 collected and periodically analyzed to ensure the on-going effectiveness of the plan,
8 the plan will be revised accordingly and approved through the Watermaster process.

9 (Long Term Plan, p.1-2). The Long Term Plan describes itself as both an “initial” and “current”
10 version of the plan (*Ibid.*), presumably reflecting the “adaptive nature” of the plan.

11 The Long Term Plan stresses the importance of the exchange of data between
12 Watermaster and the parties, and describes the monitoring that Watermaster will continue in the
13 “Managed Area” (Southern MZ-1) in cooperation with the parties. (Long Term Plan, p. 2-2, 2-3).
14 In addition to the continued monitoring of piezometric levels, aquifer-system deformation,
15 vertical ground-surface deformation, and horizontal ground-surface deformation in the
16 “Managed Areas”, Watermaster will continue its monitoring efforts in Central MZ-1, the
17 “Southern Area”, and the “Northern Area”. (*Id.*, p. 2-3 to 2-5). Watermaster commits in the Long
18 Term Plan to further evaluation of Central MZ-1 and Northern MZ-1 pumping and subsidence
19 issues, and to “specifically design an investigation to address whether production in the Northern
20 and Central areas have a material impact on subsidence” in consultation with the MZ-1
21 Technical Committee. (*Id.*, p. 2-6).

22 Section 3 describes how Watermaster’s Long Term Plan will be “adaptive”:

23 A key element of the MZ-1 Plan is the verification of the protective nature of the
24 plan as related to permanent land subsidence and ground fissuring. This
25 verification is accomplished through continued monitoring and reporting by
26 Watermaster and revision of the MZ-1 Plan when appropriate. In this sense, the
27 MZ-1 Plan is adaptive....

28 At the end of March of each year, the MZ-1 Technical Committee will convene to
review all available data collected and analyses performed over the past year, and
to formally recommend revisions or additions to the MZ-1 Plan. These
recommendations will be run through the Watermaster process during May and,
if approved, will be budgeted for and implemented during the following fiscal
year.

1 (Id., p. 3-1)

2 Finally, Watermaster will produce an MZ-1 Annual Report at the conclusion of each fiscal
3 year (June 30). The Annual Report will include specified technical information and the "Revised
4 MZ-1 Plan". The Long Term Plan could be revised annually to include changes to the
5 "Managed Area", the list of "managed wells", and the defined "guidance level" (possibly
6 including additional guidance levels in other areas of MZ-1), as well as to change ongoing
7 monitoring efforts.

8 **B. Comments on the Long Term Plan**

9 OBMP Implementation Plan Program Element 4 required the Interim Plan to
10 "[f]ormulate a long-term management plan. The long-term management plan will include goals,
11 activities to achieve those goals, and a means to evaluate the success of the Plan." (OBMP
12 Implementation Plan, p. 26-27.) The Long Term Plan states that its goal is "to develop a
13 pumping and recharge plan to reduce to tolerable levels or abate future land subsidence and
14 ground fissuring." It appears that the Long Term Plan will include the development of a
15 pumping plan (see for example, the last three bullets on p. 2-6.) There is, however,
16 fundamentally nothing in the plan itself related to a recharge plan; recharge planning appears to
17 have been left to other processes. There is no definition of "tolerable levels" and "abatement"
18 when it comes to the ultimate objective. This latter point would seem to ultimately present a
19 challenge in that the continued monitoring is said to be necessary in order to "evaluate the
20 effectiveness of the plan to reduce to tolerable levels or abate future land subsidence and ground
21 fissuring". (Long Term Plan, p. 2-2). It is not clear how Watermaster will make this evaluation if
22 the target ("tolerable levels" vs. "abatement") is not specified.

23 Throughout the discussion of continued monitoring within the managed area, there are
24 references to monitoring of various wells, some on Table 2-2 and others generically described as
25 being in Central MZ-1 and in the Southeast Area. The location and distribution of all monitoring
26 wells should be shown on maps, as should all existing wells that are "subject to being classified
27 as Managed Wells." Finally, there remain some minor issues with Table 2-1. Chino Hills Well
28 14 is illustrated on Figure 2-1 as a "managed well," but is not included in the listing of managed

1 wells in Table 2-1. Also, based on examination of well construction details in Table 2-2, it
2 would appear that CIM Well 1A should be included as a managed well in Table 2-1.

3 There is a commitment that "by the end of Fall 2007, Watermaster will analyze and
4 compare the survey and InSAR data sets, and recommend a new scope and frequency of data
5 collection ... ". (Long Term Plan, p. 2-3) The timing is very short, and it is unclear, in light of
6 other timing (which is limited but mainly focuses on spring 2008), how such a recommendation
7 will be received and processed in the next few weeks.

8 There is some internal inconsistency in the Central MZ-1 discussion. The second bullet
9 concludes that current ground surface monitoring "has revealed a zone of potential future ground
10 fissuring". The next bullet says that data from monitoring of horizontal ground-surface
11 displacement can be used to design a program for *detailed* monitoring of horizontal strain across
12 this zone of potential ground fissuring, if deemed necessary by Watermaster. (Long Term Plan,
13 p. 2-3, 2-4) The section concludes that Watermaster will revise the Long Term Plan pursuant to
14 the process in Section 3 "if future data from existing monitoring ... indicate the potential for
15 adverse impacts due to subsidence". If monitoring has already "revealed a zone of potential
16 ground fissuring", it would appear that the "potential for adverse impacts due to subsidence" has
17 already been indicated.

18 Certain provisions of the Long Term Plan, while based on the Stipulation, appear to focus
19 on Chino Hills. Presumably, Watermaster will consult with all well owners in the Managed
20 Area to "evaluate the best available options for the City", as well as for the other well owners, "to
21 produce a reasonable quantity of groundwater from MZ-1". (Long Term Plan, p. 2-6) Since all
22 deep pumping has an interrelated effect on groundwater levels at the target PA-7 piezometer, it
23 would seem that any pumping plan will need to take into account the respective pumping by
24 other deep well owners.

25 **C. Reasonableness of Plan**

26 The Long Term Plan stops short of specifically defining its target, as described in the
27 stated goal of the plan, to reduce to tolerable levels or abate future land subsidence and ground
28 fissuring. However, the Long Term Plan establishes a Guidance Level to avoid new inelastic

1 (permanent) subsidence in southwest MZ-1, which is based on detailed investigation and
2 interpretation. The Guidance Level represents the best available target to avoid new inelastic
3 (permanent) subsidence in that area. It is reasonable to expect that implementation of the plan
4 with continued voluntary compliance by the parties will succeed in identifying whether new
5 inelastic subsidence is avoided, whether the Guidance Level needs to be revised and/or applied
6 to a larger area, and whether the same or some other numeric value(s) should be adopted to avoid
7 new inelastic subsidence.

8 Watermaster's Long Term Plan rests on two principles. The first principle is that
9 management of subsidence should be "adaptive in nature": "This means that while the Plan sets
10 out a set of actions to be taken by Watermaster, this plan of activities may change through time
11 as additional information is obtained and analyzed." (Watermaster Points and Authorities, p.13).

12 The second principle is that the parties will voluntarily cooperate in Watermaster's
13 monitoring efforts and will follow Watermaster's recommendations in the form of its Guidance
14 Criteria in operating deep wells within MZ-1. Watermaster believes the parties will voluntarily
15 cooperate: "Staff sees no evidence to suggest that the voluntary participation by the parties is
16 unsuccessful." (Watermaster Points and Authorities, p. 9). "At this point in time Watermaster has
17 no reason to believe that the parties will not make prudent management decisions based on the
18 information provided to them by Watermaster." (*Id.*, p. 12) "Watermaster believes that the
19 affected parties in MZ-1 are sufficiently concerned with the potential to cause subsidence that the
20 continuation of a voluntary program consistent with the approach utilized by the Interim Plan is
21 the most effective and efficient means to manage subsidence in MZ-1 on a long-term basis." (*Id.*,
22 p. 13). "Watermaster will not presume that any of the producers operating within MZ-1 will
23 disregard the guidance criteria for extended periods or in a manner that will cause unmitigated
24 harm." (*Id.*, p. 13-14).

25 Notwithstanding its reliance on the principles of "adaptive" management and voluntary
26 cooperation, Watermaster has "reserved whatever discretion it may have under the Judgment to
27 make constructive improvements." (Watermaster Points and Authorities, p. 14). The Stipulation
28 also provides:

1 “Watermaster’s [sic] reserves its authority to take further actions consistent with
2 the Judgment and the Peace Agreement to avoid or address an existing or
3 threatened emergency to prevent Material Physical Injury as may be authorized
4 by the Judgment or the Peace Agreement.”

5 (Stipulation ¶ 5). The scope of Watermaster’s discretion and authority is not at issue here.

6 **V.**

7 **ARGUMENTS AND EVIDENCE FOR WATERMASTER’S REQUESTED FINDINGS**

8 Requested Finding No. 1: The OBMP requires Watermaster to address subsidence in the
9 Chino Basin, but it does not specify particular actions to be taken.

10 Evidence: OBMP Implementation Plan Program Element 4 states that “an interim
11 management plan will be developed to minimize subsidence and fissuring while new information
12 is collected to assess the causes and to develop an effective long-term management plan.”

13 (OBMP Implementation Plan, p. 26.) The OBMP Implementation Plan contains a list of
14 activities to be included in the interim management plan. One of the activities is to “[f]ormulate
15 a long-term management plan. The long-term management plan will include goals, activities to
16 achieve those goals, and a means to evaluate the success of the plan.” (*Id.*, p. 26-27.)

17 Requested Finding No. 2. The Interim Plan has successfully addressed subsidence on a
18 short-term basis.

19 Evidence: The MZ-1 Summary Report states: “The current state of aquifer-system
20 deformation in south MZ-1 (in the vicinity of Ayala Park) is essentially elastic. Little, if any,
21 inelastic (permanent) compaction is now occurring in the area, which is in contrast to the
22 past....” (MZ-1 Summary Report, p. ES-1.) An April 4, 2007 technical memorandum from
23 Wildermuth Environmental Inc. states: “...during the spring 2005 to spring 2006 period, [two of
24 the benchmarks in MZ-1] recorded a light rebound of the land surface.” (See Watermaster
25 Points and Authorities, p. 10; Exhibit “J” to Watermaster’s Motion.)

26 Requested Finding No. 3. The Long Term Plan proposes a reasonable approach to the
27 issue of subsidence on a long-term basis.

28 Argument: Watermaster argues the Long Term Plan “follows the spirit of the Interim
Plan” (Watermaster Points and Authorities, p. 8, lns. 3-4.) Watermaster also argues:

1 ...the Interim Plan turns out to have charted exactly the right course to accomplish the
2 goals of the plan: to bring subsidence under control, to come to understand the
3 mechanisms of subsidence in the Chino Basin, and to determine what needs to happen on
4 a long term basis. Accordingly, the challenge presented for the plan is to maintain the
effectiveness of the solution that has been established by the parties through voluntary
cooperation rather than trying to remediate an existing problem.

5 (*Id.*, p. 10, lns. 21-26.)

6 Requested Finding No. 4. The Long Term Plan is consistent with the Judgment, the
7 OBMP and Peace Agreement.

8 Argument: Watermaster's Points and Authorities include argument showing that the
9 Long Term Plan is consistent with the OBMP. No argument is made with respect to the
10 Judgment or Peace Agreement. (See Watermaster Points and Authorities, p. 10.)

11 VI.

12 RECOMMENDATION

13 According to the stipulation filed by Watermaster, City of Chino Hills will withdraw its
14 opposition to Watermaster's motion and requested findings. As noted earlier, Watermaster
15 contends the stipulation itself is sufficient. There is support for Findings Nos. 1, 2, and 3.
16 Insufficient argument has been presented with respect to Finding No. 4. The request for Finding
17 No. 5 has been withdrawn.


18 The Court should direct Watermaster to proceed with the Long Term Plan as presented,
19 and to report to the Court regarding implementation of and revisions to the plan as part of its
20 regular OBMP implementation status reporting.⁴ The Long Term Plan provides for the intended
21 (albeit voluntary) maintenance of groundwater levels above a Guidance Level that derives from
22 intensive investigation of the southwest MZ-1 area; the intensive investigation suggests that
23 increased subsidence can be avoided with this approach. The Long Term Plan also provides for
24 expanded monitoring and investigation of subsidence in other areas within and adjacent to
25 southwest MZ-1 to better understand cause-and-effect relationships between groundwater
26 pumping and subsidence, which may result in expanding the Subsidence Managed Area as
27 appropriate. The "adaptive" nature of the Long Term Plan, based on continued monitoring and

28 ⁴ Watermaster's OBMP Status Report 2007-01 has not yet been filed. It was due September 1, 2007.

1 interpretation of pumping, groundwater levels, and ground level data, is intended to result in
2 confirmation, revision, and/or expansion of the Guidance Level, again as appropriate. The Long
3 Term Plan provides that Watermaster will produce an MZ-1 annual report at the conclusion of
4 each fiscal year, and that the Long Term Plan can be revised based on that report. Watermaster
5 should be ordered to file the MZ-1 annual reports with the Court.

6 The reasonableness of the Long Term Plan rests on the "adaptive" nature of the plan
7 itself, and on Watermaster's belief that it is in the parties' interest to continue voluntarily to
8 operate within the guidance criteria and to cooperate in Watermaster's monitoring efforts. It
9 appears, overall, that the Long Term Plan is a reasonable plan to address subsidence and
10 fissuring in MZ-1. Risks of fissuring and subsidence are such that the Court can rest assured that
11 the parties would bring the issue back to the Court if the Long Term Plan were not adapted to
12 future circumstances.

13
14 Dated: October 15, 2007

15
16 
17 Anne J. Schneider, Special Referee
18
19
20
21
22
23
24
25
26
27
28

CHINO BASIN WATERMASTER
Case No. RCV 51010
Chino Basin Municipal Water District v. The City of Chino

PROOF OF SERVICE

I declare that:

I am employed in the County of San Bernardino, California. I am over the age of 18 years and not a party to the within action. My business address is Chino Basin Watermaster, 9641 San Bernardino Road, Rancho Cucamonga, California 91730; telephone (909) 484-3888.

On October 16, 2007, I served the following:

1) SPECIAL REFEREE'S COMMENTS AND RECOMMENDATIONS CONCERNING MOTION FOR APPROVAL OF WATERMASTER'S LONG TERM PLAN FOR MANAGEMENT OF SUBSIDENCE

BY MAIL: in said cause, by placing a true copy thereof enclosed with postage thereon fully prepaid, for delivery by United States Postal Service mail at Rancho Cucamonga, California, addresses as follows:

See attached service list: Mailing List 1


BY PERSONAL SERVICE: I caused such envelope to be delivered by hand to the addressee.

BY FACSIMILE: I transmitted said document by fax transmission from (909) 484-3890 to the fax number(s) indicated. The transmission was reported as complete on the transmission report, which was properly issued by the transmitting fax machine.

BY ELECTRONIC MAIL: I transmitted notice of availability of electronic documents by electronic transmission to the email address indicated. The transmission was reported as complete on the transmission report, which was properly issued by the transmitting electronic mail device.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on October 16, 2007 in Rancho Cucamonga, California.



Janine Wilson
Chino Basin Watermaster

RICHARD ANDERSON
1365 W. FOOTHILL BLVD
SUITE 1
UPLAND, CA 91786

RODNEY BAKER
COUNSEL FOR EGGWEST &
JOHNSON
PO BOX 438
COULTERVILLE, CA 95311-0438

WILLIAM P CURLEY
PO BOX 1059
BREA, CA 92882-1059

CRAIG STEWART
GEOMATRIX CONSULTANTS INC
510 SUPERIOR AVE, SUITE 200
NEWPORT BEACH, CA 92663

LEAGUE OF CA HOMEOWNERS
ATTN: KEN WILLIS
99 "C" STREET, SUITE 209
UPLAND, CA 91786

CHARLES FIELD
4415 FIFTH STREET
RIVERSIDE, CA 92501

CARL HAUGE
SWRCB
PO BOX 942836
SACRAMENTO, CA 94236-0001

SUSAN TRAGER
LAW OFFICES OF SUSAN M. TRAGER
19712 MACARTHUR BLVD
SUITE 120
IRVINE, CA 92612

DAN FRALEY
HERMAN G. STARK YOUTH
CORRECTIONAL FACILITY
15180 S EUCLID
CHINO, CA 91710

DAVID B. COSGROVE
RUTAN & TUCKER
611 ANTON BLVD
SUITE 1400
COSTA MESA, CA 92626

PAUL HOFER
11248 S TURNER AVE
ONTARIO, CA 91761

JOE DELGADO
BOYS REPUBLIC
3493 GRAND AVENUE
CHINO HILLS, CA 91709

GLEN DURRINGTON
5512 FRANCIS ST
CHINO, CA 91710

DICK DYKSTRA
10129 SCHAEFER
ONTARIO, CA 91761-7973

RALPH FRANK
25345 AVENUE STANFORD, STE 208
VALENCIA, CA 91355

CARL FREEMAN
L.D. KING
2151 CONVENTION CENTRE WAY
ONTARIO, CA 91764

BOB BEST
NAT'L RESOURCE CONS SVCS
25864 BUSINESS CENTER DR K
REDLANDS, CA 92374

JIM GALLAGHER
SOUTHERN CALIFORNIA WATER CO
2143 CONVENTION CENTER WAY
SUITE 110
ONTARIO, CA 91764

DON GALLEANO
4220 WINEVILLE RD
MIRA LOMA, CA 91752-1412

PETER HETTINGA
14244 ANON CT
CHINO, CA 91710

PETE HALL
PO BOX 519
TWIN PEAKS, CA 92391

MANUEL CARRILLO
CONSULTANT TO SENATOR SOTO
822 N EUCLID AVE, SUITE A
ONTARIO, CA 91762

KRONICK ET AL
KRONICK MOSKOVITZ TIEDEMANN
& GIRARD
400 CAPITOL MALL, 27TH FLOOR
SACRAMENTO, CA 95814-4417

RONALD LA BRUCHERIE
12953 S BAKER AVE
ONTARIO, CA 91761-7903

JOEL KUPERBERG
OCWD GENERAL COUNSEL
RUTAN & TUCKER, LLP
611 ANTON BLVD., 14TH FLOOR
COSTA MESA, CA 92626-1931

ANNESLEY IGNATIUS
COUNTY OF SAN BERNARDINO FCD
825 E 3RD ST
SAN BERNARDINO, CA 92415-0835

W. C. "BILL" KRUGER
CITY OF CHINO HILLS
2001 GRAND AVE
CHINO HILLS, CA 91709

STEVE ARBELBIDE
417 PONDEROSA TR
CALIMESA, CA 92320

SANDRA ROSE
PO BOX 337
CHINO, CA 91708

JOHN ANDERSON
12475 CEDAR AVENUE
CHINO, CA 91710

SWRCB
PO BOX 2000
SACRAMENTO, CA 95809-2000

JUSTIN BROKAW
MARYGOLD MUTUAL WATER CO
9725 ALDER ST
BLOOMINGTON, CA 92316-1637

JOHN THORNTON
PSOMAS AND ASSOCIATES
3187 RED HILL AVE, SUITE 250
COSTA MESA, CA 92626

ALAN MARKS
COUNSEL – COUNTY OF SAN
BERNARDINO
157 W 5TH STREET
SAN BERNARDINO, CA 92415

R.E. THRASH III
PRAXAIR
5705 AIRPORT DR
ONTARIO, CA 91761

BOB KUHN
669 HUNTERS TRAIL
GLEN DORA, CA 91740

GEOFFREY VANDEN HEUVEL
CBWM BOARD MEMBER
8315 MERRILL AVENUE
CHINO, CA 91710

BRIAN GEYE
DIRECTOR OF TRACK ADMIN
CALIFORNIA SPEEDWAY
PO BOX 9300
FONTANA, CA 92334-9300

MICHAEL THIES
SPACE CENTER MIRA LOMA INC
3401 S ETIWANDA AVE, BLDG 503
MIRA LOMA, CA 91752-1126

ROBERT BOWCOCK
INTEGRATED RESOURCES MGMNT
405 N. INDIAN HILL BLVD
CLAREMONT, CA 91711-4724

SENATOR NELL SOTO
STATE CAPITOL
ROOM NO 4066
SACRAMENTO, CA 95814

JIM BOWMAN
CITY OF ONTARIO
303 EAST "B" STREET
ONTARIO, CA 91764

DAVID SCRIVEN
KRIEGER & STEWART
ENGINEERING
3602 UNIVERSITY AVE
RIVERSIDE, CA 92501

Distribution List Name: Committee List 1- Court Filings, Water Transactions

Members:

Alfred E. Smith	asmith@nossaman.com
Andy Malone	amalone@wildermuthenvironmental.com
Anne Schneider	ajs@eslawfirm.com
April Woodruff	awoodruff@ieua.org
Arnold Rodriguez	jarodriguez@sarwc.com
Art Kidman	akidman@mkblawyers.com
Ashnok Dhingra	ashok.dhingra@m-e.aecom.com
Barbara Swanson	Barbara_Swanson@yahoo.com
Bill Kruger	citycouncil@chinohills.org
Bill Rice	WRice@waterboards.ca.gov
Bill Thompson	bthompson@ci.norco.ca.us
Bob Feenstra	feenstra@agconceptsinc.com
Bob Kuhn	bgkuhn@aol.com
Bonnie Tazza	bonniet@cvwdwater.com
Boyd Hill	bhill@mkblawyers.com
Brenda Fowler	balee@fontanawater.com
Brian Hess	bhess@niagarawater.com
Butch Araiza	butcharaiza@mindspring.com
Charles Field	cdfield@charter.net
Charles Moorrees	cmoorrees@sawaterco.com
Chris Swanberg	chris.swanberg@corr.ca.gov
Cindy LaCamera	clacamera@mwdh2o.com
Craig Stewart	cstewart@geomatrix.com
Curtis Aaron	caaron@fontana.org
Dan Arrighi	darrighi@sgwwater.com
Dan Hostetler	dghostetler@csupomona.edu
Dan McKinney	dmckinney@rhlaw.com
Dave Argo	argodg@bv.com
Dave Crosley	DCrosley@cityofchino.org
Dave Ringel	david.j.ringel@us.mwhglobal.com
David B. Anderson	danders@water.ca.gov
David D DeJesus	ddejesus@mwdh2o.com
David D DeJesus	davidcicgm@aol.com
Diane Sanchez	dianes@water.ca.gov
Don Galleano	donald@galleanowinery.com
Duffy Blau	Duffy954@aol.com
Eldon Horst	ehorst@jcsd.us
Eric Garner	elgarner@bbklaw.com
Eunice Ulloa	ulloa.cbwcd@verizon.net
Frank Brommenschinkel	frank.brommen@verizon.net
Fred Fudacz	ffudacz@nossaman.com
Fred Lantz	flantz@ci.burbank.ca.us
Gene Koopman	GTKoopman@aol.com
Gerard Thibeault	gthibeault@rb8.swrcb.ca.gov
Gordon P. Treweek	GTreweek@CBWM.ORG
Grace Cabrera	grace_cabrera@ci.pomona.ca.us
Henry Pepper	henry_pepper@ci.pomona.ca.us
James Jenkins	cnomgr@airports.sbcounty.gov
James P. Morris	jpmorris@bbklaw.com
Janine Wilson	Janine@CBWM.ORG
Jarlath Oley	joley@mwdh2o.com
Jean Cihigoyenetche	Jean_CGC@hotmail.com
jeeinc@aol.com	jeeinc@aol.com
Jeffrey L. Pierson	jpierson@unitexcorp.com
Jennifer Novak	jennifer.novak@doj.ca.gov
Jerry King	jking@psomas.com
Jess Senecal	JessSenecal@lagerlof.com
Jill Willis	jnwillis@bbklaw.com
Jim Hill	jhill@cityofchino.org
Jim Markman	jmarkman@rwglaw.com
Jim Taylor	jim_taylor@ci.pomona.ca.us
Jim@city-attorney.com	Jim@city-attorney.com
jimmy@city-attorney.com	jimmy@city-attorney.com
Joe Graziano	jgraz4077@aol.com

Joe P LeClaire
Joe Scalmanini
John Anderson
John Huitsing
John Rossi
John Schatz
John Vega
Judy Schurr
Julie Saba
Kathy Kunysz
Kathy Tiegs
Ken Jeske
Ken Kules
Kenneth Willis
Kevin Sage
Kyle Snay
Lisa Hamilton
Mark Hensley
Martin Zvirbulis
Robert Bowcock

jleclaire@wildermuthenvironmental.com
jscal@lsce.com
janderson@ieua.org
johnhuitsing@gmail.com
jrossi@wmwd.com
jschatz13@cox.net
johnv@cvwdwater.com
jschurr@earthlink.net
jsaba@ieua.org
kkunysz@mwdh2o.com
ktiegs@ieua.org
kjeske@ci.ontario.ca.us
kkules@mwdh2o.com
kwillis@homeowners.org
Ksage@IRMwater.com
kylesnay@gswater.com
Lisa.Hamilton@corporate.ge.com
mhensley@localgovlaw.com
martinz@cvwdwater.com
bbowcock@irmwater.com

Distribution List Name: Committee List 2 - Court Filings, Water Transactions

Members:

Manuel Carrillo	Manuel.Carrillo@SEN.CA.GOV
Marilyn Levin	marilyn.levin@doj.ca.gov
Mark Kinsey	mkinsey@mvwd.org
Mark Ward	mark_ward@ameron-intl.com
Mark Wildermuth	mwildermuth@wildermenthenvironmental.com
Martha Davis	mdavis@ieua.org
Martin Rauch	martin@rauchcc.com
Martin Zvirbulis	martinz@cvwdwater.com
Maynard Lenhert	directorlenhert@mvwd.org
Michael B. Malpezzi	MMalpezzi@reliant.com
Michael Fife	Mfife@hatchparent.com
Michelle Staples	mstaples@jdpplaw.com
Mike Del Santo	mdeisant@prologis.com
Mike Maestas	mmaestas@chinohills.org
Mike McGraw	mjm McGraw@FontanaWater.com
Mike Thies	mthies@spacecenterinc.com
Mohamed El-Amamy	melamamy@ci.ontario.ca.us.
Nathan deBoom	n8deboom@gmail.com
Pam Wilson	pwilson@hatchparent.com
Paul Deutsch	pdeutch@geomatrix.com
Paul Hofer	farmwatchtoo@aol.com
Paula Molter	PMolter@CBWM.ORG
Pete Hall	r.pete.hall@cdcr.ca.gov
Phil Krause	pkrause@parks.sbcounty.gov
Phil Rosentrater	prosentrater@wmwd.com
Rachel R Robledo	RRobledo@HatchParent.com
Raul Garibay	raul_garibay@ci.pomona.ca.us
Richard Atwater	Atwater@ieua.org
Rick Hansen	rhansen@tvmwd.com
Rick Rees	rrees@geomatrix.com
Rita Kurth	ritak@cvwdwater.com
Robert Bowcock	rbowcock@irmwater.com
Robert Cayce	rcayce@airports.sbcounty.gov
Robert DeLoach	robertd@cvwdwater.com
Robert Neufeld	roberth@cvwdwater.com
Robert Rauch	robert.rauchcc@verizon.net
Robert Tock	rtock@jcsd.us
Robert W. Nicholson	rwnicholson@sgwwater.com
Robert Young	rkyoung@fontanawater.com
Roger Florio	roger.florio@ge.com
Ron Craig	RonC@rbf.com
Ron Small	ron.small@dgs.ca.gov
Rosemary Hoerning	rhoerning@ci.upland.ca.us
Sam Fuller	samf@sbvmwd.com
Sandra S. Rose	ybarose@verizon.net
Sandy Lopez	slopez@ci.ontario.ca.us
Scott Burton	sburton@ci.ontario.ca.us
Steve Arbelbide	sarbelbide@californiasteel.com
Steve Kennedy	skennedy@bbmblaw.com
Steven K. Beckett	skbeckett@bbmblaw.com
Steven Lee	slee@rhlaw.com
Steven R. Orr	sorr@rwglaw.com
Tej Pahwa	tpahwa@dtsc.ca.gov
Terry Catlin	tlcatlin@verizon.net
Timothy Ryan	tjryan@sgwwater.com
Tom Bunn	TomBunn@Lagerlof.com
Tom Love	TLove@ieua.org
Tom McPeters	THMcP@aol.com
Tracy Tracy	ttracy@mvwd.org
vhampton@jcsd.us	vhampton@jcsd.us
Wayne Davison	wayne.davison2@cdcr.ca.gov
William J. Brunick	bbrunick@bbmblaw.com
WM Admin Staff	