

FEE EXEMPT

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CHINO BASIN WATERMASTER

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

CHINO BASIN MUNICIPAL WATER
DISTRICT,

Plaintiff,

v.

CITY OF CHINO, et al.,

Defendant.

Case No. RCV 51010

[Assigned for All Purposes to the Honorable
STANFORD E. REICHERT]

**WATERMASTER'S RESPONSE TO CITY
OF CHINO'S OBJECTIONS TO
DECLARATION OF MARK
WILDERMUTH SUBMITTED IS
SUPPORT OF WATERMASTER'S
MOTION REGARDING 2015 SAFE YIELD
RESET AGREEMENT, AMENDMENT OF
RESTATED JUDGMENT, PARAGRAPH 6**

Date: February 26, 2016
Time: 1:30 P.M.
Dept.: R-6

[Filed concurrently with Watermaster's Reply
to Oppositions to Motion Regarding 2015 Safe
Yield Reset Agreement; Watermaster's
Response to Objections to Decl. of Kavounas;
Supplemental Decl. of Wildermuth;
Supplemental Decl. of Kavounas; Supplemental
Decl. of Maurizio]

The CHINO BASIN WATERMASTER ("Watermaster") hereby submits its Response to
the City of Chino's ("Chino") Objections to Declaration of Mark Wildermuth Submitted with
Watermaster's Motion Regarding 2015 Safe Yield Reset Agreement, Amendment of Restated

Judgment, Paragraph 6.

MATERIALS OBJECTED TO: Declaration of Mark Wildermuth	GROUNDNS FOR OBJECTION:
1. "The original 2003 Chino Basin Groundwater Model was developed by me and under my direction, as have been all of the updates to that model, including significant updates in 2006 and 2007." (Para. 4, lines 3-5.)	Lacks foundation. (Evid. C. §702) Irrelevant and immaterial. (Evid. C. §350) Hearsay. (Evid. C. §1200) Oral testimony inadmissible to prove the contents of a writing. (Evid. C. §1523) WATERMASTER'S RESPONSE: Evidence Code Section 210 defines relevant evidence as evidence, including evidence relevant to the credibility of a witness or hearsay declarant, having any tendency in reason to prove or disprove any disputed fact that is of consequence to the determination of the action. This statement provides background information on the 2003 Chino Basin Groundwater Model and the declarant's involvement with the model. Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the "preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony." As the declarant developed the model and its

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MATERIALS OBJECTED TO: Declaration of Mark Wildermuth	GROUNDS FOR OBJECTION:
	<p>updates, he has the appropriate foundation for this statement. There is no out of court statement being offered for the truth of the matter asserted in this statement so there is no validity to the hearsay objection. Finally, there is no testimony in this statement being offered to prove the content of a writing.</p>
<p>2. "These prior versions of the model served as the basis for the Parties' agreement to and this Court's approval of the Peace II measures, and were used in the evaluation, pursuant to the California Environmental Quality Act, of the storage and recovery project with the Metropolitan Water District of Southern California referred to as the Dry Year Yield Agreement." (Para. 4, lines 5-8.)</p>	<p>Lacks foundation. (Evid. C. §702) Irrelevant and immaterial. (Evid. C. §350) Hearsay. (Evid. C. §1200) Improper lay opinion; opinion based on improper matter. (Evid. C. §§800, 803)</p> <p>WATERMASTER'S RESPONSE:</p> <p>Evidence Code Section 210 defines relevant evidence as evidence, including evidence relevant to the credibility of a witness or hearsay declarant, having any tendency in reason to prove or disprove any disputed fact that is of consequence to the determination of the action. This statement provides background information on the 2003 Chino Basin Groundwater Model as well as subsequent versions and their use. Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the "preliminary fact is within the</p>

MATERIALS OBJECTED TO: Declaration of Mark Wildermuth	GROUND FOR OBJECTION:
	<p>personal knowledge of a witness concerning the subject matter of his testimony.” As the declarant developed the model and its updates and knows how they were used, he has the appropriate foundation for this statement. There is no out of court statement being offered for the truth of the matter asserted in this statement so there is no validity to the hearsay objection. Finally, there is no testimony in this statement being offered to prove the content of a writing.</p>
<p>3. "The Regional Water Quality Control Board for the Santa Ana Region ('Regional Board') accepted the model's predictions for evaluation and approval of Watermaster's proposal that the Basin be managed under the 'Maximum Benefit' mechanism." (Para. 4, lines 9-11)</p>	<p>Lacks foundation. (Evid. C. §702) Irrelevant and immaterial. (Evid. C. §350) Hearsay. (Evid. C. §1200) Improper lay opinion; opinion based on improper matter. (Evid. C. §§800, 803) WATERMASTER'S RESPONSE: Evidence Code Section 210 defines relevant evidence as evidence, including evidence relevant to the credibility of a witness or hearsay declarant, having any tendency in reason to prove or disprove any disputed fact that is of consequence to the determination of the action. This statement provides background information on the 2003 Chino Basin</p>

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<p>MATERIALS OBJECTED TO:</p> <p>Declaration of Mark Wildermuth</p>	<p>GROUND FOR OBJECTION:</p>
	<p>Groundwater Model as well as subsequent versions and their use. Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the “preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony.” As the declarant developed the model and its updates and knows how they were used, he has the appropriate foundation for this statement. There is no out of court statement being offered for the truth of the matter asserted in this statement so there is no validity to the hearsay objection. Finally, the declarant is not offering an opinion, expert or otherwise, in this statement. The declarant is summarizing his understanding of certain events.</p>
<p>4. "An updated version of the 2007 model provided the basis for the Parties' decision-making in the process of finalizing the 2013 Amendment to the 2010 Recharge Master Plan Update, approved by this Court in October 2013, and has been used by the Regional Board in order to evaluate the achievement of Hydraulic Control within the Basin." (Para. 4, lines 11-15.)</p>	<p>Irrelevant and immaterial. (Evid. C. §350) Lacks foundation. (Evid. C. §702) Hearsay. (Evid. C. §1200) Improper lay opinion; opinion based on improper matter. (Evid. C. §§800, 803) WATERMASTER'S RESPONSE: Evidence Code Section 210 defines relevant evidence as evidence, including evidence relevant to the credibility of a witness or</p>

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MATERIALS OBJECTED TO: Declaration of Mark Wildermuth	GROUNDS FOR OBJECTION:
	<p>hearsay declarant, having any tendency in reason to prove or disprove any disputed fact that is of consequence to the determination of the action. This statement provides background information on the 2003 Chino Basin Groundwater Model as well as subsequent versions and their use. Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the "preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony." As the declarant developed the model and its updates and knows how they were used, he has the appropriate foundation for this statement. There is no out of court statement being offered for the truth of the matter asserted in this statement so there is no validity to the hearsay objection. Finally, the declarant is not offering an opinion, expert or otherwise, in this statement. The declarant is summarizing his understanding of certain events.</p>
<p>5. "The most recent 2013 update ('the 2013 Model') is an update of and improvement upon the 2003 model and its updates." (Para. 5, lines 16-17)</p>	<p>Irrelevant and immaterial. (Evid. C. §350) Lacks foundation. (Evid. C. §702) WATERMASTER'S RESPONSE: Evidence Code Section 210 defines relevant</p>

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<p>MATERIALS OBJECTED TO:</p> <p>Declaration of Mark Wildermuth</p>	<p>GROUND FOR OBJECTION:</p>
	<p>evidence as evidence, including evidence relevant to the credibility of a witness or hearsay declarant, having any tendency in reason to prove or disprove any disputed fact that is of consequence to the determination of the action. This statement provides a summary of the background information for the 2013 updated model. Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the “preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony.” As the declarant developed the model and its updates and knows how they were used, he has the appropriate foundation for this statement.</p>
<p>6. "Construction of the 2013 Model, its calibration and application to evaluate and update the Safe Yield of the Chino Basin is described in a draft report entitled Draft -- 2013 Chino Basin Groundwater Model Update and Recalculation of Safe Yield Pursuant to Peace Agreements (attached hereto as 'Exhibit I')." (Para. 5, lines 17 -20.)</p>	<p>Irrelevant and immaterial. (Evid. C. §350) Lacks foundation. (Evid. C. §702) Hearsay. (Evid. C. §1200)</p> <p>WATERMASTER'S RESPONSE:</p> <p>Evidence Code Section 210 defines relevant evidence as evidence, including evidence relevant to the credibility of a witness or hearsay declarant, having any tendency in reason to prove or disprove any disputed fact that is of consequence to the determination of</p>

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MATERIALS OBJECTED TO:	GROUNDNS FOR OBJECTION:
Declaration of Mark Wildermuth	
	the action. This statement provides background information on the 2013 Model and the information contained within the Draft—2013 Chino Basin Groundwater Model Update and Recalculation of Safe Yield Pursuant to Peace Agreement. Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the “preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony.” As the declarant developed the model and its updates and knows how they were used, he has the appropriate foundation for this statement. There is no out of court statement being offered for the truth of the matter asserted in this statement so there is no validity to the hearsay objection.
7. Exhibit 1 ("Draft – 2013 Chino Basin Groundwater Model Update and Recalculation of Safe Yield Pursuant to Peace Agreements"), attached to Declaration of Mark Wildermuth	Irrelevant and immaterial. (Evid. C. §350) Lacks foundation. (Evid. C. §702) Hearsay. (Evid. C. §1200) Improper expert opinion. (Evid. C. §80 1.) WATERMASTER'S RESPONSE: Evidence Code Section 210 defines relevant evidence as evidence, including evidence relevant to the credibility of a witness or hearsay declarant, having any tendency in

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MATERIALS OBJECTED TO: Declaration of Mark Wildermuth	GROUND FOR OBJECTION:
	reason to prove or disprove any disputed fact that is of consequence to the determination of the action. This statement provides background information on the 2013 Model and the information contained within the Draft—2013 Chino Basin Groundwater Model Update and Recalculation of Safe Yield Pursuant to Peace Agreement. Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the “preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony.” As the declarant developed the model and its updates and knows how they were used, he has the appropriate foundation for this statement. There is no out of court statement being offered for the truth of the matter asserted in this statement so there is no validity to the hearsay objection. Further, the declarant is a consulting expert and he has the appropriate basis for such an opinion.
8. "The 2013 Model is the result of approximately three years of model development and application efforts." (Para. 6, lines 23-24.)	Irrelevant and immaterial. (Evid. C. §350) Lacks foundation. (Evid. C. §702) WATERMASTER'S RESPONSE: Evidence Code Section 210 defines relevant evidence as evidence, including evidence

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MATERIALS OBJECTED TO: Declaration of Mark Wildermuth	GROUND FOR OBJECTION:
	<p>relevant to the credibility of a witness or hearsay declarant, having any tendency in reason to prove or disprove any disputed fact that is of consequence to the determination of the action. This statement provides background information on the 2013 Model. Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the "preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony." As the declarant developed the model and its updates and knows how they were used, he has the appropriate foundation for this statement.</p>
<p>9. "In brief, the 2013 Model includes and expands upon the hydrogeologic data included in the 2003 and 2007 Models, incorporating new production data, precipitation data, hydrogeologic data, and interpretations of them." (Para. 5, lines 20-22.)</p>	<p>Irrelevant and immaterial. (Evid. C. §350) Lacks foundation. (Evid. C. §702) Hearsay. (Evid. C. §1200) Improper expert opinion. (Evid. C. §80 1.) WATERMASTER'S RESPONSE: Evidence Code Section 210 defines relevant evidence as evidence, including evidence relevant to the credibility of a witness or hearsay declarant, having any tendency in reason to prove or disprove any disputed fact that is of consequence to the determination of</p>

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<p>MATERIALS OBJECTED TO:</p> <p>Declaration of Mark Wildermuth</p>	<p>GROUND FOR OBJECTION:</p>
	<p>the action. This statement provides background information on the 2013 Model. Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the “preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony.” As the declarant developed the model and its updates and knows how they were used, he has the appropriate foundation for this statement. Further, while the declarant is a consulting expert, he is not giving an expert opinion in this statement. He is simply summarizing the document for the Court’s benefit.</p>
<p>10. "Based on the modeling and calibration efforts detailed above, it is my opinion that Watermaster now has the ability to, and can competently, reasonably, and accurately perform the required basin yield reevaluation arising from the OBMP Implementation Plan and prior orders of this Court." (Para. 6, lines 24-27).</p>	<p>Irrelevant and immaterial. (Evid. C. §350) Lacks foundation. (Evid. C. §702) Improper lay opinion; opinion based on improper matter. (Evid. C. §§800, 803) Improper expert opinion. (Evid. C. §80 1.) WATERMASTER'S RESPONSE: Evidence Code Section 210 defines relevant evidence as evidence, including evidence relevant to the credibility of a witness or hearsay declarant, having any tendency in reason to prove or disprove any disputed fact</p>

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MATERIALS OBJECTED TO: Declaration of Mark Wildermuth	GROUND FOR OBJECTION:
	<p>that is of consequence to the determination of the action. This statement provides background information on the 2013 Model. Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the "preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony." As the declarant developed the model and its updates and knows how they were used, he has the appropriate foundation for this statement. Further, the declarant is a consulting expert and he has the appropriate basis for such an opinion.</p>
<p>11. "the Updated Basin Model has been calibrated with a high degree of confidence and has been peer reviewed by representatives of the Parties to the Judgment." (Para. 7, lines 28-1).</p>	<p>Irrelevant and immaterial. (Evid. C. §350) Lacks foundation. (Evid. C. §702) Improper lay opinion; opinion based on improper matter. (Evid. C. §§800, 803) Improper expert opinion. (Evid. C. §801) Hearsay. (Evid. C. §1200)</p> <p>WATERMASTER'S RESPONSE:</p> <p>Evidence Code Section 210 defines relevant evidence as evidence, including evidence relevant to the credibility of a witness or hearsay declarant, having any tendency in reason to prove or disprove any disputed fact</p>

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MATERIALS OBJECTED TO: Declaration of Mark Wildermuth	GROUND FOR OBJECTION:
	<p>that is of consequence to the determination of the action. This statement provides background information on the 2013 Model. Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the "preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony." As the declarant developed the model and its updates and knows how they were used, he has the appropriate foundation for this statement. Further, the declarant is a consulting expert and he has the appropriate basis for such an opinion.</p>
<p>12. "Hydraulic Control will be achieved in fiscal 2016." (Para. 8, lines 8- 10.)</p>	<p>Irrelevant and immaterial. (Evid. C. §350) Lacks foundation. (Evid. C. §702) Improper lay opinion; opinion based on improper matter. (Evid. C. §§800, 803) Improper expert opinion. (Evid. C. §80 1.) Hearsay. (Evid. C. §1200)</p> <p>WATERMASTER'S RESPONSE:</p> <p>Evidence Code Section 210 defines relevant evidence as evidence, including evidence relevant to the credibility of a witness or hearsay declarant, having any tendency in reason to prove or disprove any disputed fact</p>

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MATERIALS OBJECTED TO:	GROUNDS FOR OBJECTION:
Declaration of Mark Wildermuth	that is of consequence to the determination of the action. This statement provides background information on the 2013 Model. Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the "preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony." As the declarant developed the model and its updates and knows how they were used, he has the appropriate foundation for this statement. Further, the declarant is a consulting expert and he has the appropriate basis for such an opinion.
13. "In 2007, WMWD proposed to assume the obligation of pursuing the Future Desalters and they were subsequently joined by the Jurupa Community Services District and the City of Ontario." (Para. 9, lines 11-13.)	Irrelevant and immaterial. (Evid. C. §350) Lacks foundation. (Evid. C. §702) Hearsay. (Evid. C. §1200) WATERMASTER'S RESPONSE: Evidence Code Section 210 defines relevant evidence as evidence, including evidence relevant to the credibility of a witness or hearsay declarant, having any tendency in reason to prove or disprove any disputed fact that is of consequence to the determination of the action. This statement provides background on what occurred. Evidence Code Section

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<p>MATERIALS OBJECTED TO:</p> <p>Declaration of Mark Wildermuth</p>	<p>GROUND FOR OBJECTION:</p>
	<p>403(a)(2) sets forth that foundation is sufficient where the "preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony." As the declarant worked closely with Watermaster, he has understanding of what occurred and was involved in various proposals. Further, there is no out of court statement being offered for the truth of the matter asserted.</p>
<p>14. "The proposed allocation of Re-Operation water at the time of the Peace II Agreement was developed to ensure the completion of the additional 10 MGD of desalting capacity by WMWD and to reflect its capital commitments." (Para. 9, lines 14-17.)</p>	<p>Irrelevant and immaterial. (Evid. C. §350) Lacks foundation. (Evid. C. §702) Improper lay opinion; opinion based on improper matter. (Evid. C. §§800, 803) Improper expert opinion. (Evid. C. §80 1.) Hearsay. (Evid. C. §1200)</p> <p>WATERMASTER'S RESPONSE:</p> <p>Evidence Code Section 210 defines relevant evidence as evidence, including evidence relevant to the credibility of a witness or hearsay declarant, having any tendency in reason to prove or disprove any disputed fact that is of consequence to the determination of the action. This statement provides background information on the Re-Operation water and the way the allocation was developed. Evidence</p>

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MATERIALS OBJECTED TO: Declaration of Mark Wildermuth	GROUND FOR OBJECTION:
	Code Section 403(a)(2) sets forth that foundation is sufficient where the "preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony." As the declarant developed the model and its updates and knows how they were used, he has the appropriate foundation for this statement. Further, the declarant is a consulting expert and he has the appropriate basis for such an opinion. There is no out of court statement at issue in this paragraph.
15. "At the time of the Court's approval of the Peace Agreement and OBMP Implementation Plan, it was believed that the Safe Yield might be larger than was stated in the Judgment." (Para. 10, lines 18-20.)	Irrelevant and immaterial. (Evid. C. §350) Lacks foundation. (Evid. C. §702) Improper lay opinion; opinion based on improper matter. (Evid. C. §§800, 803) Improper expert opinion. (Evid. C. §80 1.) Hearsay. (Evid. C. §1200) WATERMASTER'S RESPONSE: Evidence Code Section 210 defines relevant evidence as evidence, including evidence relevant to the credibility of a witness or hearsay declarant, having any tendency in reason to prove or disprove any disputed fact that is of consequence to the determination of the action. This statement provides background

1	MATERIALS OBJECTED TO:	GROUND FOR OBJECTION:
3	Declaration of Mark Wildermuth	
4		information on the Re-Operation water and the
5		way the allocation was developed. Evidence
6		Code Section 403(a)(2) sets forth that
7		foundation is sufficient where the "preliminary
8		fact is within the personal knowledge of a
9		witness concerning the subject matter of his
10		testimony." As the declarant developed the
11		model and its updates and knows how they
12		were used, he has the appropriate foundation
13		for this statement. Further, the declarant is a
14		consulting expert and he has the appropriate
15		basis for such an opinion. There is no out of
16		court statement at issue in this paragraph.
17	16. "At the time of the development of the	Irrelevant and immaterial. (Evid. C. §350)
18	2013 Model, despite the construction of the	Lacks foundation. (Evid. C. §702)
19	Desalters and the implementation of the Peace	Improper lay opinion; opinion based on
20	II Measures, the evaluation of available	improper matter. (Evid. C. §§800, 803)
21	production data, long-term hydrology and	Improper expert opinion. (Evid. C. §801.)
22	prevailing cultural conditions suggested that	Hearsay. (Evid. C. §1200)
23	there may have been a decline in Safe Yield."	WATERMASTER'S RESPONSE:
24	(Para. 10, lines 20-23.)	Evidence Code Section 210 defines relevant
25		evidence as evidence, including evidence
26		relevant to the credibility of a witness or
27		hearsay declarant, having any tendency in
28		reason to prove or disprove any disputed fact

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<p>MATERIALS OBJECTED TO:</p> <p>Declaration of Mark Wildermuth</p>	<p>GROUND FOR OBJECTION:</p>
	<p>that is of consequence to the determination of the action. This statement provides background information on the Re-Operation water and the way the allocation was developed. Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the "preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony." As the declarant developed the model and its updates and knows how they were used, he has the appropriate foundation for this statement. Further, the declarant is a consulting expert and he has the appropriate basis for such an opinion. There is no out of court statement at issue in this paragraph.</p>
<p>17. "I, with my staff at my direction, prepared the following Exhibits to the Agreement: Exhibit 'A,' the Reset Technical Memorandum; Exhibit 'D,' the Storage Losses Technical Memorandum; and, Exhibit 'E,' the Safe Storage Management Technical Memorandum." (Para. 11, lines 24-28.)</p>	<p>Irrelevant and immaterial. (Evid. C. §350) Lacks foundation. (Evid. C. §702)</p> <p>WATERMASTER'S RESPONSE:</p> <p>Evidence Code Section 210 defines relevant evidence as evidence, including evidence relevant to the credibility of a witness or hearsay declarant, having any tendency in reason to prove or disprove any disputed fact that is of consequence to the determination of the action. This statement provides background</p>

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MATERIALS OBJECTED TO: Declaration of Mark Wildermuth	GROUND FOR OBJECTION:
	information on the exhibits. Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the “preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony.” As the declarant developed the exhibits and knows how they were used, he has the appropriate foundation for this statement.
18. Exhibit "A" to the Safe Yield Reset Agreement: the Reset Technical Memorandum. (Para. 11, lines 26-27.)	Irrelevant and immaterial. (Evid. C. §350) Lacks foundation. (Evid. C. §702) Hearsay. (Evid. C. §1200) WATERMASTER'S RESPONSE: Evidence Code Section 210 defines relevant evidence as evidence, including evidence relevant to the credibility of a witness or hearsay declarant, having any tendency in reason to prove or disprove any disputed fact that is of consequence to the determination of the action. This statement provides background information on the exhibits. Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the “preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony.” As the declarant developed the exhibits and

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MATERIALS OBJECTED TO: Declaration of Mark Wildermuth	GROUNDS FOR OBJECTION:
	<p>knows how they were used, he has the appropriate foundation for this statement.</p> <p>There is no out of court statement at issue in this paragraph.</p>
<p>19 Exhibit "D" to the Safe Yield Reset Agreement: the Storage Losses Technical Memorandum. (Para. 11, lines 27.)</p>	<p>Irrelevant and immaterial. (Evid. C. §350)</p> <p>Lacks foundation. (Evid. C. §702)</p> <p>Hearsay. (Evid. C. §1200)</p> <p>WATERMASTER'S RESPONSE:</p> <p>Evidence Code Section 210 defines relevant evidence as evidence, including evidence relevant to the credibility of a witness or hearsay declarant, having any tendency in reason to prove or disprove any disputed fact that is of consequence to the determination of the action. This statement provides background information on the exhibits. Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the "preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony."</p> <p>As the declarant developed the exhibits and knows how they were used, he has the appropriate foundation for this statement.</p> <p>There is no out of court statement at issue in this paragraph.</p>

1	MATERIALS OBJECTED TO:	GROUNDS FOR OBJECTION:
3	Declaration of Mark Wildermuth	
4	20. Exhibit "E" to the Safe Yield Reset	Irrelevant and immaterial. (Evid. C. §350)
5	Agreement: the Safe Storage Management	Lacks foundation. (Evid. C. §702)
6	Technical Memorandum. (Para. 11, lines 27.)	Hearsay. (Evid. C. §1200)
7		WATERMASTER'S RESPONSE:
8		Evidence Code Section 210 defines relevant
9		evidence as evidence, including evidence
10		relevant to the credibility of a witness or
11		hearsay declarant, having any tendency in
12		reason to prove or disprove any disputed fact
13		that is of consequence to the determination of
14		the action. This statement provides background
15		information on the exhibits. Evidence Code
16		Section 403(a)(2) sets forth that foundation is
17		sufficient where the "preliminary fact is within
18		the personal knowledge of a witness
19		concerning the subject matter of his testimony."
20		As the declarant developed the exhibits and
21		knows how they were used, he has the
22		appropriate foundation for this statement.
23		There is no out of court statement at issue in
24		this paragraph.
25	21. "Using the 2013 Model and the	Irrelevant and immaterial. (Evid. C. §350)
26	methodology described in the Reset Technical	Lacks foundation. (Evid. C. §702)
27	Memorandum, the Safe Yield for the	Improper lay opinion; opinion based on
28	2010/2011-2019/2020 time period identified in	improper matter. (Evid. C. §§800, 803)

<p>1 MATERIALS OBJECTED TO:</p> <p>3 Declaration of Mark Wildermuth</p>	<p>GROUND FOR OBJECTION:</p>
<p>4 the OBMP Implementation Plan and</p> <p>5 Watermaster's Rules and Regulations is</p> <p>6 approximately 135,000 afy." (Para. 12, lines 1-</p> <p>7 3.)</p>	<p>Improper expert opinion. (Evid. C. §801)</p> <p>Hearsay. (Evict. C. §1200)</p> <p>WATERMASTER'S RESPONSE:</p> <p>Evidence Code Section 210 defines relevant</p> <p>evidence as evidence, including evidence</p> <p>relevant to the credibility of a witness or</p> <p>hearsay declarant, having any tendency in</p> <p>reason to prove or disprove any disputed fact</p> <p>that is of consequence to the determination of</p> <p>the action. Evidence Code Section 403(a)(2)</p> <p>sets forth that foundation is sufficient where the</p> <p>"preliminary fact is within the personal</p> <p>knowledge of a witness concerning the subject</p> <p>matter of his testimony." As the declarant</p> <p>developed the information he has the</p> <p>appropriate foundation for this statement.</p> <p>Further, the declarant is a consulting expert and</p> <p>he has the appropriate basis for such an</p> <p>opinion. There is no out of court statement at</p> <p>issue in this paragraph.</p>
<p>22. "In my opinion, he methodology</p> <p>described in the Reset Technical Memorandum</p> <p>is consistent with the Judgment, OBMP</p> <p>Implementation Plan and the Court's prior</p> <p>orders." (Para. 13, lines 4-5.)</p>	<p>Irrelevant and immaterial. (Evid. C. §350)</p> <p>Lacks foundation. (Evid. C. §702)</p> <p>Improper lay opinion; opinion based on</p> <p>improper matter. (Evict. C. §§800, 803)</p> <p>Hearsay. (Evict. C. §1200)</p>

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MATERIALS OBJECTED TO: Declaration of Mark Wildermuth	GROUNDS FOR OBJECTION:
	<p>WATERMASTER'S RESPONSE:</p> <p>Evidence Code Section 210 defines relevant evidence as evidence, including evidence relevant to the credibility of a witness or hearsay declarant, having any tendency in reason to prove or disprove any disputed fact that is of consequence to the determination of the action. Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the "preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony." As the declarant developed the information he has the appropriate foundation for this statement. Further, the declarant is a consulting expert and he has the appropriate basis for such an opinion. There is no out of court statement at issue in this paragraph.</p>
<p>23. "Specifically, the Updated Basin Model has incorporated data from the 2000/2001-2009/2010 period, along with long-term hydrology from 1921 to the date of the reset evaluation." (Para. 13, lines 6- 7.)</p>	<p>Irrelevant and immaterial. (Evid. C. §350)</p> <p>Lacks foundation. (Evid. C. §702)</p> <p>Improper lay opinion; opinion based on improper matter. (Evid. C. §§800, 803)</p> <p>Hearsay. (Evid. C. §1200)</p> <p>WATERMASTER'S RESPONSE:</p>

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<p>MATERIALS OBJECTED TO:</p> <p>Declaration of Mark Wildermuth</p>	<p> GROUNDS FOR OBJECTION:</p>
	<p>Evidence Code Section 210 defines relevant evidence as evidence, including evidence relevant to the credibility of a witness or hearsay declarant, having any tendency in reason to prove or disprove any disputed fact that is of consequence to the determination of the action. Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the “preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony.” As the declarant developed the information he has the appropriate foundation for this statement. Further, the declarant is a consulting expert and he has the appropriate basis for such an opinion. There is no out of court statement at issue in this paragraph.</p>
<p>24. "Based on my experience in the field of groundwater hydrology and years of experience in the Chino Basin, I believe the approach to be a prudent and reasonable professional methodology, consistent with professional custom, standard and practice." (Para. 13, lines 7-10.)</p>	<p>Irrelevant and immaterial. (Evid. C. §350)</p> <p>Lacks foundation. (Evid. C. §702)</p> <p>Improper lay opinion; opinion based on improper matter. (Evid. C. §§800, 803)</p> <p>Hearsay. (Evid. C. §1200)</p> <p>WATERMASTER'S RESPONSE:</p> <p>Evidence Code Section 210 defines relevant evidence as evidence, including evidence</p>

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<p>MATERIALS OBJECTED TO:</p> <p>Declaration of Mark Wildermuth</p>	<p>GROUND FOR OBJECTION:</p>
	<p>relevant to the credibility of a witness or hearsay declarant, having any tendency in reason to prove or disprove any disputed fact that is of consequence to the determination of the action. Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the “preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony.” As the declarant developed the information he has the appropriate foundation for this statement. Further, the declarant is a consulting expert and he has the appropriate basis for such an opinion. There is no out of court statement at issue in this paragraph.</p>
<p>25. "In my opinion, the Basin protection measures to which the parties have agreed in the 2015 Safe Yield Reset Agreement will ensure that the Basin is not harmed by extractions of 135,000 afy of water through fiscal2020." (Para. 14, lines 11-13.)</p>	<p>Irrelevant and immaterial. (Evid. C. §350) Lacks foundation. (Evid. C. §702) Improper lay opinion; opinion based on improper matter. (Evid. C. §§800, 803) Hearsay. (Evid. C. §1200)</p> <p>WATERMASTER'S RESPONSE:</p> <p>Evidence Code Section 210 defines relevant evidence as evidence, including evidence relevant to the credibility of a witness or hearsay declarant, having any tendency in</p>

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MATERIALS OBJECTED TO: Declaration of Mark Wildermuth	GROUNDS FOR OBJECTION:
	<p>reason to prove or disprove any disputed fact that is of consequence to the determination of the action. Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the “preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony.” As the declarant developed the information he has the appropriate foundation for this statement. Further, the declarant is a consulting expert and he has the appropriate basis for such an opinion. There is no out of court statement at issue in this paragraph.</p>
<p>26. "In my opinion, the Basin protection measures to which the parties have agreed in the 2015 Safe Yield Reset Agreement, including the Safe Storage Management Measures, will ensure that the Basin is not harmed by extractions of the 20,000 af that was allocated in the past four years than would have been allocated if the Safe Yield had been reset to 135,000 afy in 2011." (Para.15,lines 14-17.)</p>	<p>Irrelevant and immaterial. (Evid. C. §350) Lacks foundation. (Evid. C. §702) Irrelevant and immaterial. (Evid. C. §350) Lacks foundation. (Evid. C. §702) Improper lay opinion; opinion based on improper matter. (Evid. C. §§800, 803) Hearsay. (Evid. C. §1200) WATERMASTER'S RESPONSE: Evidence Code Section 210 defines relevant evidence as evidence, including evidence relevant to the credibility of a witness or hearsay declarant, having any tendency in</p>

<p>MATERIALS OBJECTED TO:</p> <p>Declaration of Mark Wildermuth</p>	<p>GROUND FOR OBJECTION:</p>
	<p>reason to prove or disprove any disputed fact that is of consequence to the determination of the action. Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the "preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony." As the declarant developed the information he has the appropriate foundation for this statement. Further, the declarant is a consulting expert and he has the appropriate basis for such an opinion. There is no out of court statement at issue in this paragraph.</p>
<p>27. "Using methodology consistent with prudent professional standards, Watermaster's hydrologic consultant estimates that since the early 1900s, more than 2.1 million af has been withdrawn from the Basin in excess of recharge to the Basin." (Para. 16, lines 18-20.)</p>	<p>Irrelevant and immaterial. (Evid. C. §350)</p> <p>Lacks foundation. (Evid. C. §702)</p> <p>Improper lay opinion; opinion based on improper matter. (Evid. C. §§800, 803)</p> <p>Hearsay. (Evid. C. §1200)</p> <p>WATERMASTER'S RESPONSE:</p> <p>Evidence Code Section 210 defines relevant evidence as evidence, including evidence relevant to the credibility of a witness or hearsay declarant, having any tendency in reason to prove or disprove any disputed fact that is of consequence to the determination of</p>

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MATERIALS OBJECTED TO:	GROUNDS FOR OBJECTION:
Declaration of Mark Wildermuth	the action. Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the “preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony.” As the declarant developed the information he has the appropriate foundation for this statement. Further, the declarant is a consulting expert and he has the appropriate basis for such an opinion. There is no out of court statement at issue in this paragraph.

Dated: February 1, 2016

BROWNSTEIN HYATT FARBER
SCHRECK, LLP


By: _____

SCOTT S. SLATER
BRADLEY J. HERREMA
ATTORNEYS FOR
CHINO BASIN WATERMASTER

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 February 1, 2016 I served the following:

1. WATERMASTER'S RESPONSE TO CITY OF CHINO'S OBJECTIONS TO DECLARATION OF MARK WILDERMUTH SUBMITTED IN SUPPORT OF WATERMASTER'S MOTION REGARDING 2015 SAFE YIELD RESET AGREEMENT, AMENDMENT OF RESTATED JUDGMENT, PARAGRAPH 6

/X/ 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.

/X/ 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 February 1, 2016 in Rancho Cucamonga, California.



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Chino-Basin Watermaster

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