

FEE EXEMPT

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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF SAN BERNARDINO - RANCHO CUCAMONGA DISTRICT**

11 CHINO BASIN MUNICIPAL WATER
12 DISTRICT,

13 Plaintiff,

14 v.

15 CITY OF CHINO, et al.,

16 Defendants.

CASE NUMBER: RCV51010
[Assigned for All Purposes to the Honorable
Stanford E. Reichert]

**CITY OF CHINO'S OBJECTIONS TO
MARK WILDERMUTH SUPPLEMENTAL
DECLARATION IN SUPPORT OF
WATERMASTER'S REPLY TO CHINO
OPPOSITION**

Date: June 24, 2016
Time: 1:30 p.m.
Dept.: R6

(FEE- EXEMPT PURSUANT TO GOVERNMENT
CODE § 6103)

21 **TO: WATERMASTER, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

22 Defendant City of Chino hereby objects to the Supplemental Declaration of Mark
23 Wildermuth dated February 1, 2016 in Support of Watermaster's Reply to Chino's
24 Opposition to Watermaster's Motion Regarding 2015 Safe Yield Reset Agreement,
25 Amendment of Restated Judgment, Paragraph 6.

26 **THE COURT CANNOT CONSIDER ANY LATE-FILED EVIDENCE**

27 Code of Civil Procedure section 1005 (b) required Watermaster, as the moving party,
28 to have filed and served "*all moving and supporting papers . . . at least court 16 days*

1 before the hearing.” Similarly, California Rules of Court, Rule 3.1113(j) states that “to the
2 extent practicable, all supporting declarations and affidavits must be attached to the notice of
3 motion.” Clearly, CCP § 1005(b) and Rule 3.1113(j) required Watermaster to have served all
4 of its evidence on its Motion with the notice of motion. Neither CCP § 1005(b) or Rule
5 3.1113(j) permit Watermaster to file reply declarations in support of its Motion after Chino
6 and Jurupa had filed their Oppositions to Watermaster’s motion.

7 In the context of reply briefs, “[p]oints raised for the first time in a reply brief will
8 ordinarily not be considered, because such consideration would deprive the respondent of an
9 opportunity to counter the argument.” [*Reichardt v. Hoffman* (1997) 52 Cal.App.4th 754,
10 764]. Indeed, “[t]he general rule of motion practice...is that new evidence is not permitted
11 with reply papers The inclusion of additional evidentiary matter with the reply should
12 only be allowed in the exceptional case . . . and if permitted, the other party should be given
13 the opportunity to respond.” [*Jay v. Mahaffey* (2013) 218 Cal.App.4th 1522, 1538].

14 The Court of Appeals in *Jay* further explained that “[t]his rule is based on the same
15 solid logic applied in the appellate courts, specifically, that ‘[p]oints raised for the first time
16 in a reply brief will ordinarily not be considered, because such consideration would deprive
17 the respondent of an opportunity to counter the argument.’ (Id., citing *American Drug Stores,*
18 *Inc. v. Stroh* (1992) 10 Cal.App.4th 1446, 1453.)

19 To permit Watermaster to raise new arguments or submit new evidence in its reply
20 brief would contravene the authorities cited above and be in violation of Chino’s’ due process
21 rights. The court must refuse to consider arguments and evidence first raised in reply
22 papers. (*Balboa Ins. Co. v. Aguirre* (1983) 149 Cal.App.3d 1002, 1010.)

23 Pursuant to the foregoing authorities, Chino requests the Court to strike the
24 Supplemental Declaration of Mark Wildermuth dated February 1, 2016 in support of
25 Watermaster’s Reply to Chino’s Opposition to Watermaster’s Motion Regarding 2015 Safe
26 Yield Reset Agreement, Amendment of Restated Judgment, Paragraph 6.

27 Chino also objects to the substance of the Wildermuth declaration as set forth below:
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1 MATERIALS OBJECTED TO:	2 GROUNDS FOR OBJECTION:
3 Supplemental Declaration of Mark 4 Wildermuth	
5 1. "My methodology was reviewed and 6 accepted by other licensed professionals 7 retained by the municipal water agencies 8 involved in litigation. Upon completion of 9 my work I testified on recharge and where 10 my work was accepted by the Court and 11 used as the basis for establishing the safe 12 yield in the recent settlement of 13 groundwater rights. The safe yield was 14 based on natural recharge estimate by me 15 from historical data including precipitation 16 for the period 1951 through 2005 and 17 adjusted for present cultural conditions." 18 (Para. 4, lines 14-20.)	19 Irrelevant and immaterial. (Evid. C. §350.) 20 Lacks foundation. (Evid. C. §702.) 21 Improper lay opinion; opinion based on 22 improper matter. (Evid. C. §§800, 803.) 23 Improper expert opinion. (Evid. C. §801.) 24 Hearsay. (Evid. C. §1200.) 25 Oral testimony inadmissible to prove the 26 contents of a writing. (Evid. C. §1523.)
27 2. "The work done pursuant to the 28 OMBP Implementation Plan allows for beneficial use of the Basin's waters to be made, such that the Safe Yield need not be reduced due to potential undesirable results of pumping at a certain level within the Basin" (Para. 7, lines 1-3.)	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.) Improper expert opinion. (Evid. C. §801.) Legal Conclusion (Evid. C. §801, <i>Summers v</i> <i>A.L. Gilbert</i> (1999) 69 Cal.App.4th 1155.)

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<p>3. "I have re-reviewed the Model Update Report and it accurately describes the process of updating the model and the evaluation of the Basin Safe Yield that supports the conclusions in the 2015 Safe Yield Reset Agreement." (Para. 8, lines 8-10)</p>	<p>Lacks foundation. (Evid. C. §702.)</p> <p>Irrelevant and immaterial. (Evid. C. §350.)</p> <p>Hearsay. (Evid. C. §1200.)</p> <p>Improper lay opinion; opinion based on improper matter. (Evid. C. §§800, 803.)</p> <p>Improper expert opinion. (Evid. C. §801.)</p> <p>Legal Conclusion (Evid. C. §801, <i>Summers v A.L. Gilbert</i> (1999) 69 Cal.App.4th 1155.)</p>
<p>4. "I have reviewed the Declaration of Robert Shibatani in Support of the City of Chino's Opposition to Watermaster's Motion . . . and considered the suggestions therein both during the negotiation that resulted in the 2015 Safe Yield Reset Agreement and since." (Para. 10, lines 16-19.)</p>	<p>Irrelevant and immaterial. (Evid. C. §350.)</p> <p>Lacks foundation. (Evid. C. §702.)</p> <p>Hearsay. (Evid. C. §1200.)</p> <p>Improper expert opinion. (Evid. C. §801.)</p>

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<p>5. "The procedure to estimate Safe Yield is described in Exhibit A to the This Methodology was drafted by me. The Methodology consists of a five-step process to estimate net recharge and Safe Yield. The first four steps deal with the estimate of net recharge. The fifth step in the process is: '5. Qualitatively evaluate . . . then Watermaster will identify and implement . . . a combination of mitigation measures and a changed Safe Yield. (Para. 11, lines 20-28 and 1-4.)</p>	<p>Irrelevant and immaterial. (Evid. C. §350.) Lacks foundation. (Evid. C. §702.) Improper expert opinion. (Evid. C. §801.) Legal Conclusion. (Evid. C. §801, <i>Summers v A.L. Gilbert</i> (1999) 69 Cal.App.4th 1155.)</p>
<p>6. "Undesirable results may be qualitatively identified from monitoring activities and qualitative assessments of modeling work. For example, the monitoring of groundwater levels . . . can be used to estimate depth to groundwater, but the determination that the depth to groundwater causes excessive pumping lift is a qualitative determination. Watermaster's groundwater model . . . can be used to quantitatively determine changes in groundwater management to mitigate undesirable results, including resetting Safe Yield, which is the intention of step 5 above." (Para. 12, lines 4-11.)</p>	<p>Irrelevant and immaterial. (Evid. C. §350.) Lacks foundation. (Evid. C. §702.) Hearsay. (Evid. C. §1200.) Improper expert opinion. (Evid. C. §801.) Legal conclusion. (Evid. C. §801, <i>Summers v A.L. Gilbert</i> (1999) 69 Cal.App.4th 1155.)</p>

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<p>7. “Watermaster . . . with WEI, conducts extensive monitoring of the Basin and performs periodic interpretation of the monitoring data. This information is interpreted by both Watermaster staff and WEI to determine if undesirable results have or are projected to occur. These interpretations . . . are subsequently investigated to determine the precise causes of the undesirable result and to identify means to mitigate or manage it.” (Para. 13, lines 12-17.)</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>Improper expert opinion. (Evid. C. §801.)</p> <p>Legal Conclusion (Evid. C. §801, <i>Summers v A.L. Gilbert</i> (1999) 69 C.A.4th 1155.)</p>
<p>8. “Currently there are indications of potential imminent undesirable results: the ongoing permanent land subsidence in the northwest Management Zone 1 area (“MZI”) and a groundwater production sustainability challenge in the Jurupa Community Services District (JCSD) service area.” (Para. 14, lines 17-21.)</p>	<p>Irrelevant and immaterial. (Evid. C. §350.)</p> <p>Lacks foundation. (Evid. C. §702.)</p> <p>Hearsay. (Evid. C. §1200.)</p> <p>Improper expert opinion. (Evid. C. §801.)</p> <p>Legal Conclusion (Evid. C. §801, <i>Summers v A.L. Gilbert</i> (1999) 69 Cal.App.4th 1155.)</p>

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<p>9. “WEI detected these potential imminent undesirable results as part of monitoring ground levels . . . not from the water budget table derived from the Watermaster model. These challenges are due to groundwater elevations in those areas that are lower than necessary to not have such challenges. Both are potential undesirable results . . . being investigated in the ongoing OBMP implementation, and should be considered in resetting the Safe Yield. And, neither of these challenges would be readily identifiable in a water budget table.” (Para. 14, lines 21-28 and 1.)</p>	<p>Irrelevant and immaterial. (Evid. C. §350.) Lacks foundation. (Evid. C. §702.) Improper expert opinion. (Evid. C. §801.) Legal Conclusion (Evid. C. §801, <i>Summers v A.L. Gilbert</i> (1999) 69 Cal.App.4th 1155.)</p>
<p>10. “According to the Watermaster records that I have reviewed, there are over 400,000 acre-ft of water in stored water accounts that may be produced from the Basin in addition to the Basin’s Safe Yield. Producing the stored water could exacerbate the two challenges identified above.” (Para. 15, lines 2-5)</p>	<p>Irrelevant and immaterial. (Evid. C. §350.) Lacks foundation. (Evid. C. §702.) Hearsay. (Evid. C. §1200.) Improper expert opinion. (Evid. C. §801.) Legal Conclusion (Evid. C. §801, <i>Summers v A.L. Gilbert</i> (1999) 69 Cal.App.4th 1155.)</p>

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11. "The Watermaster's groundwater modeling work . . . projects that groundwater levels will decline in the Northwest MZ1 area and the JCSD service area in the future. Therefore, setting the Safe Yield based on net recharge plus additional mining of water in storage is not prudent and is inconsistent with my professional understanding of the Judgement definition of Safe Yield." (Para. 15, lines 5-9.)	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.)
12. "It is my opinion that climate change is occurring and could likely impact future net recharge to the Basin. However, based on my research and the research conducted under my direction, the BCSD precipitation predictions . . . do not accurately predict precipitation in the Santa Ana River Watershed, which includes the Chino Basin." (Para. 16, lines 10-19.)	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.)

13. "We compared the historical precipitation at the Laguna Beach precipitation station to BCSD GCM projections, which demonstrated that the GCM projections failed to produce the historical wet and dry periods that occurred in the period 1950 to 2000." (Para. 17, lines 25-28.)	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.) Legal Conclusion (Evid. C. §801, <i>Summers v A.L. Gilbert</i> (1999) 69 Cal.App.4th 1155.)
14. "Attached hereto as Exhibit 1 is a figure showing the upper Santa Ana Watershed . . . and the location of three precipitation stations . . . which was relied upon by the Santa Ana River Watermaster in its annual reports. Exhibit 1 was prepared at my direction and I believe it to be accurate." (Para. 18, lines 3-7.)	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.)
15. "The CDFM plot is used to identify wet and dry periods." (Para. 20, lines 20-21.)	Irrelevant and immaterial. (Evid. C. §350.) Lacks foundation. (Evid. C. §702.) Hearsay. (Evid. C. §1200.) Improper expert opinion. (Evid. C. §801.)

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16. "Analysis . . . for all three precipitation stations, as shown in Exhibits 2a through 2c, indicated that the GCM: failed to reproduce the dry period that ran from 1950 (actually 1946) through 1977, included a very wet period in the late 1950s through early 1960 that did not occur, included a very dry period from 1969 through 1974 that did not occur, and tended to capture the wet period that generally ran from 1978 through 1983, but entirely missed the 1998 El Nino southern oscillation event." (Para. 21, lines 24-28, 1.)

Irrelevant and immaterial. (Evid. C. §350.)
Lacks foundation. (Evid. C. §702.)
Hearsay. (Evid. C. §1200.)
Improper expert opinion. (Evid. C. §801.)

17. "Review of these CDFM plots illustrated in Exhibits 3a through 3c shows that the GCM predictions are slightly better than with the CCSM3 model in matching the climatic trends through the late 1960s, but thereafter, the CCSM4 model performs substantially poorer than the CCSM3 model projections In summary, the GCM's failed to duplicate wet and dry periods" (Para. 22, lines 6-12.)

Irrelevant and immaterial. (Evid. C. §350.)
Lacks foundation. (Evid. C. §702.)
Hearsay. (Evid. C. §1200.)
Improper expert opinion. (Evid. C. §801.)

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18. "Review of Figures 2d and 3d shows:
(1) the CDFM plots for precipitation
observed at the precipitation stations follow
very similar time trends, indicating that the
three precipitation stations have identical
wet and dry periods . . . , but they significant
differences in the range of wetness and
dryness . . . , indicating geospatial
differences in the amount of observed
precipitation; and (2) the GCM precipitation
projections track each other very closely . . .
, and the GCM projections fail to reproduce
the geospatial variability in precipitation."
(Para. 23, line 13-19.)

Irrelevant and immaterial. (Evid. C. §350.)
Lacks foundation. (Evid. C. §702.)
Hearsay. (Evid. C. §1200.)
Improper expert opinion. (Evid. C. §801.)

19. "Note that, in all the scatter plots, the
points that represent direct comparisons . . .
are well distributed throughout the plot area
and do not follow the perfect-fit line,
indicating that the GCMs failed to produce
accurate estimates of precipitation... The
coefficient of determination for each plot is
less than or equal to 0.001, indicating that
the GCMs can predict 0.1 percent or less of
the variance observed in the observed data."
(Para. 25, lines 1-9.)

Irrelevant and immaterial. (Evid. C. §350.)
Lacks foundation. (Evid. C. §702.)
Hearsay. (Evid. C. §1200.)
Improper expert opinion. (Evid. C. §801.)

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<p>20. "Another tool related to the coefficient of determination that is used to determine how well a GCM replicates historical precipitation is the Nash-Sucliffe efficiency (NSE) index. . . The NSE index computed for the comparison of the historical precipitation to the BCSD GCM precipitation estimates for the Santa Ana Watershed and the Chino Basin are all negative, indicating the BCSD GCM projections do not accurately reproduce historical precipitation." (Para. 26, lines 10-27.)</p>	<p>Irrelevant and immaterial. (Evid. C. §350.) Lacks foundation. (Evid. C. §702.) Hearsay. (Evid. C. §1200.) Improper expert opinion. (Evid. C. §801.)</p>
<p>21. "It is my opinion that the GCMs are not calibrated to reproduce historical precipitation in the Santa Ana Watershed and the Chino Basin, the expected accuracy in their projections beyond 2010 cannot be assumed to be better than in the historical period, and, therefore, contrary to Mr. Shibatani's opinion, the GCM projections of precipitation should not be used as a basis for projecting Safe Yield in the Chino Basin." (Para. 27, lines 28 and 1-4)</p>	<p>Irrelevant and immaterial. (Evid. C. §350.) Lacks foundation. (Evid. C. §702.) Hearsay. (Evid. C. §1200.) Improper expert opinion. (Evid. C. §801.)</p>

22. "Though, as described above, I believe climate change to be occurring, there are three reasons why it is my opinion that it is appropriate to use historical precipitation data in the Safe Yield reset. Firstly, climate change is not just starting to occur, it likely started affecting precipitation in the mid-20th century, and thus it is included in the historical precipitation record. Secondly, climate change is occurring gradually; there is no need to rush into using GCM projections if the predictive capability of GCMs cannot be demonstrated. And, finally, GCMs and their projections will improve over time, and precipitation and temperature projections from them should be considered in future Safe Yield resets as explicitly stated in Section 4.4 of the 2015 Safe Yield Reset Agreement" (Para. 28, lines 5-17.)

Irrelevant and immaterial. (Evid. C. §350.)
Lacks foundation. (Evid. C. §702.)
Hearsay. (Evid. C. §1200.)
Improper expert opinion. (Evid. C. §801.)
Legal Conclusion (Evid. C. §801, *Summers v A.L. Gilbert* (1999) 69 Cal.App.4th 1155.)

Dated: May 24, 2016

GUTIERREZ, FIERRO & ERICKSON, A.P.C.

By:


Jimmy L. Gutierrez
Attorney for Defendant City of Chino

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 May 26, 2016 I served the following:

1. CITY OF CHINO'S OBJECTIONS TO MARK WILDERMUTH SUPPLEMENTAL DECLARATION IN SUPPORT OF WATERMASTER'S REPLY TO CHINO OPPOSITION

☒ 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

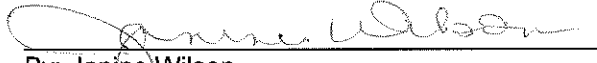
☐ BY PERSONAL SERVICE: I caused such envelope to be delivered by hand to the addressee.

☐ 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 May 26, 2016 in Rancho Cucamonga, California.


By: Janine Wilson
Chino Basin Watermaster

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