

FEE EXEMPT

TRACY J. EGOSCUE (SBN 190842)
TARREN A. TORRES (SBN 275991)
EGOSCUE LAW GROUP, INC.
3834 Pine Ave.
Long Beach, CA 90807
Tel/Facsimile: (562) 988-5978
tracy@egoscuelaw.com
tarren@egoscuelaw.com

Attorneys for OVERLYING
(AGRICULTURAL) POOL

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.,

Defendants.

Case No. RCVRS 51010

Assigned for All Purposes to the
Honorable Stanford E. Reichert

AGRICULTURAL POOL’S OBJECTION TO
JURUPA COMMUNITY SERVICES
DISTRICT’S REQUEST FOR
CONTINUANCE OF WATERMASTER
MOTION REGARDING 2020 SAFE YIELD
RESET, AMENDMENT OF RESTATED
JUDGMENT, PARAGRAPH 6;
DECLARATION OF TRACY J. EGOSCUE

Date: June 26, 2020
Time: 1:30 p.m.
Dept. S-35

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Moreover, JCSD failed to establish good cause for its disfavored continuance request; nor can it. JCSD feigns surprise by the arguments and evidence presented in the Agricultural Pool Opposition. The JCSD Request states that the continuance is needed because JCSD “understands that the Agricultural Pool has retained an expert in relation to its Opposition, JCSD will need time sufficient to review the Opposition and respond to the same...” (JCSD Request at p. 2, lines 7-9.) This suggestion that more time is needed is disingenuous. The JCSD and other parties were made aware of the Agricultural Pool’s retention of an expert to review documents and evidence produced by Watermaster related to the Watermaster’s proposed recalculation of the Safe Yield well in advance of the filing of the Agricultural Pool’s Opposition. The Agricultural Pool even provided its expert’s opinions and conclusions of that review as early as April 2020. (Declaration of Tracy J. Egoscue (Egoscue Decl.), ¶ 3.)

On April 23, 2020, the Agricultural Pool submitted questions and comments prepared by its expert consultant, GSI Environmental (GSI), in preparation for the Chino Basin 2020 Safe Yield Reset Workshop held on April 29, 2020.¹ (Egoscue Decl., at ¶ 3.) The Agricultural Pool also presented to the Watermaster GSI’s preliminary analysis of the proposed Safe Yield reset for consideration in support of a motion from the regular Pool meeting on May 14, 2020. (Egoscue Decl., at ¶ 4.) In its preliminary analysis, which the Agricultural Pool provided to the Watermaster and the Pools on May 14, 2020, GSI made the recommendation that the Agricultural Pool oppose the Safe Yield reset proposed by the Watermaster for the reasons as those set forth in the Agricultural Pool Opposition. (*Id.*, at ¶ 5, Exhibit A: GSI’s May 14, 2020 Preliminary Recommendations on Safe Yield Reset Memorandum.) The opinions, recommendations, and conclusions of GSI were again presented to the Appropriative Pool in the Agricultural Pool’s evidence brief submitted on June 9, 2020 to the Watermaster for the hearing on the Agricultural Pool’s contest of applications for local groundwater storage and water transactions.² (*Id.*, at ¶ 6.)

¹ A true and correct copy of the Agricultural Pool’s April 23, 2020 questions and comments prepared by GSI are available on the Watermaster’s public FPT website at https://cbwm.syncedtool.com/shares/folder/e83081106c3072/?folder_id=2398

² True and correct copies of the documents related to the Agricultural Pool’s contest are available on the Watermaster’s public FPT website at https://cbwm.syncedtool.com/shares/folder/e83081106c3072/?folder_id=1407 including a true and correct copy of the Agricultural Pool’s evidence brief at

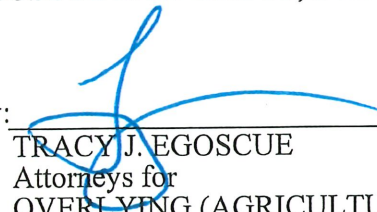
1 Additionally, the arguments and conclusions made within the Agricultural Pool
2 Opposition are based on evidence, documents, and other materials produced for or by the
3 Watermaster itself. (*Id.*, at ¶ 7.) The Appropriative Pool also had its own consultant peer
4 reviewing the Watermaster’s 2020 Safe Yield Reset reports, participating in the same workshops
5 as GSI and was thus aware of GSI’s position. Therefore, there can be no insinuation of surprise or
6 insufficient time to review and respond to the Agricultural Pool Opposition.

7 The JCSD Request also asserts that “JCSD and many of the other parties are operating
8 with stretched resources as a result of directives related to Covid 19, which creates further
9 challenges responding to the opposition.” (JCSD Request at p. 2, lines 9-11.) This argument also
10 rings insincere as the Appropriative Pool has requested—and was granted—a continuance of the
11 Agricultural Pool’s contest hearing precisely because “Watermaster and Watermaster parties are
12 preparing for the 2020 SYR Motion that is presently set for Court hearing on June 26, 2020.”
13 (Egoscue Decl., at ¶ 8, Exhibit B: June 8, 2020 Appropriative Pool Request for Continuance of
14 Scheduled [Contest] Hearing.) Lastly, the Agricultural Pool Opposition comports with the Code
15 of Civil Procedure, which satisfies JCSD’s due process issues with sufficient timing.

16 For all of the foregoing reasons, the Court should deny the JCSD’s request for
17 continuance of the hearing on the Watermaster Motion.

18
19 Dated: June 19, 2020

EGOSCUE LAW GROUP, INC.

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21 By: 
22 TRACY J. EGOSCUE
23 Attorneys for
24 OVERLYING (AGRICULTURAL) POOL

FEE EXEMPT

TRACY J. EGOSCUE (SBN 190842)
TARREN A. TORRES (SBN 275991)
EGOSCUE LAW GROUP, INC.
3834 Pine Ave.
Long Beach, CA 90807
Tel/Facsimile: (562) 988-5978
tracy@egoscuelaw.com
tarren@egoscuelaw.com

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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.,

Defendants.

Case No. RCV 51010

Assigned for All Purposes to the
Honorable Stanford E. Reichert

DECLARATION OF TRACY J. EGOSCUE IN
SUPPORT OF AGRICULTURAL POOL'S
OBJECTION TO JURUPA COMMUNITY
SERVICES DISTRICT'S REQUEST FOR
CONTINUANCE OF WATERMASTER MOTION
REGARDING 2020 SAFE YIELD RESET,
AMENDMENT OF RESTATED JUDGMENT,
PARAGRAPH 6

1. I, Tracy J. Egoscue, am an attorney licensed to practice in the State of California. Based upon my own knowledge and experience, I can competently attest to the following facts.

2. I am counsel for the Overlying (Agricultural) Pool Committee (hereafter Agricultural Pool) and this Declaration is made in support of the Agricultural Pool's Objection to Jurupa Community Services District's Request for Continuance of Watermaster's Motion Regarding 2020 Safe Yield Reset, Amendment of Restated Judgment, Paragraph 6.

3. On April 23, 2020, the Agricultural Pool submitted questions and comments prepared by its expert consultant, GSI Environmental (GSI), in preparation for the Chino Basin 2020 Safe Yield Reset Workshop held on April 29, 2020. A true and correct copy of the Agricultural Pool's

1 April 23, 2020 questions and comments prepared by GSI are available on the Watermaster's
2 public FPT website at

3 https://cbwm.syncedtool.com/shares/folder/e83081106c3072/?folder_id=2398

4 4. The Agricultural Pool also presented to the Watermaster GSI's preliminary analysis of
5 the proposed Safe Yield reset for consideration in support of a motion from the regular Pool
6 meeting on May 14, 2020. Minutes of the May 14, 2020 regular meeting are available on the
7 Watermaster's public FPT website at

8 [http://www.cbwm.org/docs/agpoolagendmin/minutes/pdf/20200514%20Minutes%20Agricultural](http://www.cbwm.org/docs/agpoolagendmin/minutes/pdf/20200514%20Minutes%20Agricultural%20Pool%20Meeting.pdf)
9 [%20Pool%20Meeting.pdf](http://www.cbwm.org/docs/agpoolagendmin/minutes/pdf/20200514%20Minutes%20Agricultural%20Pool%20Meeting.pdf).

10 5. In its preliminary analysis, GSI made the recommendation that the Agricultural Pool
11 oppose the Safe Yield reset proposed by the Watermaster for the reasons identified in the
12 Agricultural Pool Opposition. A true and correct copy of the GSI's May 14, 2020 Preliminary
13 Recommendations on Safe Yield Reset Memorandum is attached hereto as **Exhibit A.**¹

14 6. The opinions, recommendations, and conclusions of GSI were presented to the
15 Appropriate Pool in the Agricultural Pool's evidence brief submitted on June 9, 2020 to the
16 Watermaster for the hearing on the Agricultural Pool's contest. True and correct copies of the
17 documents related to the Agricultural Pool's contest are available on the Watermaster's public
18 FPT website at https://cbwm.syncedtool.com/shares/folder/e83081106c3072/?folder_id=1407
19 including a true and correct copy of the Agricultural Pool's evidence brief at

20 https://cbwm.syncedtool.com/shares/folder/e83081106c3072/?folder_id=2588

21 7. The arguments and conclusions made within the Agricultural Pool's Opposition to
22 Watermaster's 2020 Safe Yield Reset Motion are primarily based on evidence, documents, and
23 other materials produced for or by the Watermaster itself.

24 8. The Appropriate Pool has requested—and was granted—a continuance of the
25 Agricultural Pool's contest hearing because "Watermaster and Watermaster parties are preparing
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27 ¹ GSI's May 14, 2020 Preliminary Recommendations on Safe Yield Reset Memorandum was also
28 attached to the Agricultural Pool Opposition to Watermaster's 2020 Safe Yield Reset Motion as
Exhibit C.

1 for the 2020 [Safe Yield Reset] Motion that is presently set for Court hearing on June 26, 2020.”
2 A true and correct copy of the June 8, 2020 Appropriative Pool Request for Continuance of
3 Scheduled [Contest] Hearing is attached hereto as **Exhibit B**.

4 I declare under penalty of perjury that the foregoing is true and correct. Executed this 19th
5 day of June 2020 in the City of Long Beach and County of Los Angeles, State of California.

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7 By: 
8 TRACY J. EGOSCUE
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Exhibit A:
GSI's May 14, 2020 Preliminary
Recommendations on Safe Yield Reset
Memorandum

Preliminary Recommendations on Safe Yield Reset

GSI Environmental's recommendation to the Agricultural Pool of the Chino Basin is to oppose the Safe Yield reset at this time. The procedures used currently are not reasonable, prudent, stable, responsible, sustainable, or fair, as outlined in the Peace Agreement and within the standard of practice for groundwater basin management. In addition, the current Safe Yield Reset has not been prepared in accordance with the Court Ordered Methodology or the 1999 OBMP which had anticipated model errors or prediction uncertainties and included procedures to address these anticipated errors in future planning. Also, there is no Court-ordered methodology to adjust Storage Accounts later in a Storage Implementation Plan, so it may not be possible to correct errors later if the Safe Yield reset has already been accepted. The supporting bases for this recommendation are discussed below.

1. There is no accounting for actual basin conditions compared to forecasts, thus mis-managing natural basin storage

The Watermaster notes that,

"The 10-year forecast takes into account projected conditions that are expected to occur over the ensuing 10 years. While it is possible to extend the period for additional increments of time, longer forecasting entails further speculation. Historical experience in evaluating trends in the Chino Basin suggests that the projections become less reliable as they extend beyond the 10-year horizon. It is considerably easier to adjust to discrepancies between set expectations over a 10-year period than longer periods of time and consequently there is less risk to the parties and to the basin." (*Response to Questions and Comments on the April 2, 2020 Safe Yield Recalculation Report April 23, 2020 Letter from Overlying (Agricultural Pool) re Safe Yield Recalculation for Chino Basin Questions*).

This statement is correct, and we agree that expectations should be set over 10-year periods for planning purposes of the Parties within the basin. That is exactly the reason why: (a) the Safe Yield reset should include the actual hydrology of the basin over the last 10-year period; and, (b) the Court-ordered Safe Yield reset methodology prescribed in the 1999 OBMP required such an evaluation.

The probability argument provided by Wildermuth in its response to GSI's April 23, 2020 comments is incorrect. Specifically, the probability of future hydrology is not related in any way to conducting a Safe Yield reset that includes what actually happened over the past 10 years. Future planning should account for the unforeseen natural basin storage that was depleted over these past 10 drought years and allow for that amount to catch up in planning over the next 10 years. Kicking the can down the road for 10 years due to that drought (or 20 years for a 20-year drought) is not fair to future users of the basin and not prudent, responsible, sustainable, or stable as it does not consider the natural storage depletions that have actually occurred. Conversely, if the next 10 years are more wet than current predictions and actual water use was less than or equal to that predicted, then further planning will add that to the future Safe Yield. That way, you close your accounts for the previous 10 years as you plan for the next 10. Finally, as noted by the Watermaster, planning for longer periods is less reliable, so expecting some

wet distant future conditions to balance the recent drought involves speculation and should not be part of a planning process for reasonable, prudent, reliable, responsible, sustainable, and stable management of the basin.

Furthermore, the probability of future wet conditions is not in any way higher because of the recent 20-year drought. Just because a coin toss lands "heads" 10 times, does not mean it will land "tails" the next time; the probability of either heads or tails is still 50% - with a significantly smaller probability of landing on "tails" the next 10 times to average out those unfortunate 10 "heads." Even with granting all that, the predictions of Safe Yield are dependent not only on predictions of average recharge, but also on predictions of water demand and pumping. Inferring that use of an average recharge for the forecasts would balance out the Safe Yield in the long term is further incorrect since pumping plans may not pan out.

The response to Ag Pool Member Geoff Vanden Heuvel on the same issue, states that, "as a result of fullness of time, the difference will be offset in future years when wet periods occur." As noted above, that is not the case. There is no comparison being made in this issue between past and present conditions as noted in the response, rather it is a simple issue that *hoping* for "sometime in the future" to compensate for loss of Safe Yield of the previous 10 years involves speculation and is not a reasonable, responsible and prudent management strategy, nor is it fair to current users of the basin. Hope is not a strategy; however, and the Watermaster should follow a strategy that is reasonable and sustainable over the long-term.

To put this issue in an analogy that we all can relate to would be the example of our personal finances. A projected Safe Yield over 10 years is like one's anticipated earnings going into a checking account over the next 10 years. Such a projection helps to plan net spending (pumping) from the checking account over that 10-year planning period. If you earn more than you spend, you put the money into a savings account that is akin to a groundwater storage account. If you earn less than you spend, you pay the extra from your savings account, similar to taking the additional needed water from your groundwater storage account.

If 10 years later, your actual net spending (pumping) was more than your actual net earnings (net recharge) for whatever reason, you are in debt for the difference, regardless of your earlier projected income and spending amounts. To provide a stable planning environment, the bank allows you 10 years of buffering by providing you a line of credit to the checking account. When planning your finances for the subsequent 10 years, you may again project your future earnings and planned spending; you may "recalibrate" your planning according to the actual conditions over the past 10 years; however, you cannot ignore that debt from the earlier 10 years. Either you pay back that amount immediately from your savings account (an immediate adjustment to the groundwater storage account), or you include that debt payment as an earnings deduction in your checking account over the subsequent 10 years (i.e., to include the difference between projected and actual Safe Yield into the next reset). But you cannot move from a planned projection to a subsequent projection without paying for past reduced income or overspending, just by promising to have more accurate and recalibrated estimates of future income and spending. Of course, a consumer would like that, but a bank cannot operate under that condition,

passing on losses to future generations in the *hopes* that future spending will not exceed income, or taking a direct loss on its reserves.

2. It is incorrect to say that the Court Ordered methodology does not provide a mechanism for looking backwards at actual basin conditions for the next Safe Yield Reset.

In response to the Ag Pool's comment 1(b) Watermaster states that "[t]he Court-ordered Safe Yield reset methodology does not provide for any retroactive adjustments to Safe Yield or storage accounts." The "no retroactive accounting" provision at paragraph 4.8 is specific to "production years prior to July 1, 2014." This paragraph of the Order contains no language prohibiting a future correction if necessary for managing basin storage. The Language in 4.8 is that "the Watermaster will not in any manner seek to change prior accounting of the prior allocation of safe yield and operating safe yield among the parties to the Judgment for production years prior to July 1, 2014." This does not mean that future Safe Yield resets should not consider historical conditions. Instead, it specifically refers to the 140,000 afy reset to 135,000 afy that occurred in 2015 for the 2010 through 2020 timespan and that value should not be changed to account for the 5,000 afy discrepancy.

The Court-ordered Safe Yield reset methodology in the 1999 OBMP was reasonable and designed to sustainably, stably, responsibly, and prudently manage the basin. It considered that a 10-year planning period timespan was reliable, but that projections may not be accurate, and that models themselves have errors and uncertainties that need to be adjusted over time. Therefore, the 1999 OBMP prescribed that the Safe Yield reset consider what actually happened in the past 10 years and adjust for actual conditions rather than jump from one projection to another knowing that the previous projection was incorrect.

Specifically, under implementation Actions and Schedules in Section 4, the 1999 OBMP clearly states:

In year 2022/23, compute safe yield and storage loss rate for period 2012/13 through 2021/22, and reset safe yield and storage loss rates for the next the next ten-year period 2022/23 to 2031/32. Reassess storage management plan and modify Watermaster UGRR, if needed.

Similar language is used for future resets in 10-year increments up to the year 2051/52. The language clearly states that the past safe yield and storage loss rates should be computed to reset them for the next 10-years. This has not changed in further updates or Court orders. The 2015 Safe Yield Reset Methodology indicates that:

Watermaster's OBMP Implementation Plan called for an initial redetermination of Basin's Safe Yield in 2010/2011, using monitoring data that would be gathered for the first time during 2000/01 through 2009/10. This requirement is additionally carried forward in Section 6.5 of Watermaster's Rules and Regulations, which states that the "Safe Yield shall be recalculated in year 2010/11 based upon data from the ten-year period 2000/01 to 2009/10."

As noted, the requirement was to calculate Safe Yield for the next 10 years **based upon data from the previous 10 years**. The 1999 OBMP also clearly indicated that a Safe Yield should be computed for the historical period to reset the safe yield for the next 10-year period. The Reset Technical Memorandum of 2015 indicates that the 2015 Safe Yield Reset methodology is consistent with the definition of Safe Yield

in the Judgement and the Physical Solution, specifically that **"Safe Yield shall be recalculated in year 2010/11 based upon data from the ten-year period 2000/01 to 2009/10"**. The approach then indicates a model recalibration as noted below:

Use the data collected during 2000/01 to 2009/10 (and in the case of subsequent resets newly collected data) in the re-calibration process for the Watermaster's groundwater-flow model.

The approach does not specifically list the safe yield recalculation detail of the Physical Solution that indicates looking back at the previous 10 years, however, nothing the Court has ordered prevents this action. Rather, the Judgement requires stable basin management and as natural basin storage declines, it is prudent for the Watermaster to act appropriately to set a sustainable Safe Yield for the Basin.

3. There is no transparency in reporting to evaluate model results or possible errors

Model behavior cannot be clearly understood by what is reported in the 2020 Safe Yield Recalculation Final Report. Requests for additional information are not being addressed, and examples of such responses are summarized herein.

Figures in the draft report (Figures 7-6 and 7-7 in draft report) were valuable in understanding future behavior, especially if additional information on precipitation of future conditions was also added (as was shown for historical conditions) as requested. Instead, these figures were removed entirely from the final document. They are not replaced with figures that "more clearly communicate trends in DIPAW" as noted in the May 8, 2020 response to comments #3 to the Ag Pool's April 23rd comments. Comment #10 asked for more information on precipitation and the total water budget, which is a reasonable request to holistically understand water in the basin. This is not more work, but something that should be done as part of the modeling effort that evaluates both surface and subsurface water. GSI's request for a total water budget was denied.

Comment #5a asked about the discrepancy between the statement in the draft document regarding **"reduction in net recharge during the 2021 through 2030 period"** and the Figure 7-7, which showed a net **increase**. Instead of a response, the figure was removed and not included in the final report.

GSI comments #6 and #7 were specifically regarding differences between the 2013 model and the 2020 model that are greater in earlier time than in later times. The lengthy response does not address that issue. If the 2020 model update is more accurate, then that would be the case throughout the simulation time period. This was not addressed and request for additional mass balance information that may help understand this issue was also not provided.

The response to Comment #7b indicates that there were errors in the past that were corrected. Model inputs can have errors as noted here. That is why when things do not seem to add up, we request additional information to satisfy ourselves that things are correct. Withholding such information or the model is not helpful or transparent.

Response to Comment #8 is also non-responsive. The comment questions why there is an increase in water levels in the earlier model but a decrease in water levels in the model update. Instead of providing

an answer to our query, the response was focused on the semantics of the comment as to whether it was one model or more models. The additional statement that “the model-estimated storage change for the 2013 model and the 2020 CVM for the period 2000-2018 closely track each other” is not a response to why the models were showing opposite trends between 1978 and 2020. Instead, it raises additional questions regarding the model and its update, since the 2013 model used projected average conditions for recharge, while the 2020 update was operating under an extended drought between 2000 and 2018. Yet, both models are reported to “closely track each other” during that period.

The response to Comment #9 tries to separate the Safe Yield from the Storage Management Plan; however, they are intimately interlinked and depend on each other.

Lack of transparency is also noted in the response to the State of California’s comments at the April workshop and their written comments. Uncertainty of the model is not acknowledged, let alone probed. There is uncertainty in model parameters as well as in recharge and pumping projections, which are input to the model for the forecasts. Modeling standards require conducting sensitivity analyses at a minimum to help understand the aquifer better, determine significant data gaps, and improve on a model whether a Court requires it or not. These procedures are outlined in the ASTM D5611 - 94(2016) Standard Guide for Conducting a Sensitivity Analysis for a Groundwater Flow Model Application. Transparency involves addressing stakeholders concerns instead of discussing semantics of one or multiple models, and providing responses to comments that are essentially evasive, even if the Court does not obligate you to do so.

4. There are items in the current Safe Yield Reset that are not entirely clear and may have substantial consequences

The Optimal Storage Requirement (OSR) was estimated at ~ 5.3 million af, which was the estimated storage computed for the state of the basin in 1997. Of that amount, 236,000 af was already in Managed Storage around that time (in 2000). The estimated amount in Managed Storage for End-of-Year 2019 was 503,275 af, as described in the 2020 Safe Yield Reset report. Note that a complete picture of managed storage and basin storage has not been provided in one location, however, adding up these amounts, the total basin storage is about 5.6 million af.

The 2020 Safe Yield report indicates that total groundwater in storage was 12.3 MAF. However, the Safe Yield report does not provide the final values used for specific yield in the model. Only initial estimates are provided, which were changed upon calibration so it is not clear how the total basin groundwater storage is different from the OSR. Did the model “find” this extra water (up to 12.3 MAF) by increasing the specific yield? How does this 12.3 MAF affect the 5.6 MAF OSR and how are the two numbers related? It is not clear how these numbers will be used in the future so accepting the Safe Yield report with such unresolved issues is not advisable at this time.

5. Current basin operations are projected to cause MPI, and unplanned future management of storage accounts can cause MPI

As presented to the Agricultural Pool, current basin operations are projected to cause Material Physical Injury (MPI) in the future (after 2040). Also, unplanned future management of storage accounts can

cause MPI. The figures below indicate both of these possibilities. Of particular concern is the amount of water in Storage Accounts that has already reduced Basin Groundwater amounts to be below the OSR. Without some adjustment that brings Basin Storage back to OSR levels, there will definitely be MPI. It is GSI's opinion, that a management plan would be subject to legal challenges that would likely follow if the Watermaster did not allow removal of water from storage accounts. A "Leave Behind" action should be implemented at this stage to ensure fair and sustainable operation of the basin.

In the analogy of personal finances, not allowing water to be extracted from a valid Storage Account would be akin to a bank plan that would never allow clients to remove money from their savings account because it would be detrimental to the bank to ever do so. If I had vast sums of money in a savings account and the bank said I had every right to it but can never withdraw it, I would consider that as illogical and would sue the bank to get back my money. That is exactly what should be anticipated in the current situation unless rectified by a plan that is executed with basin sustainability in mind.

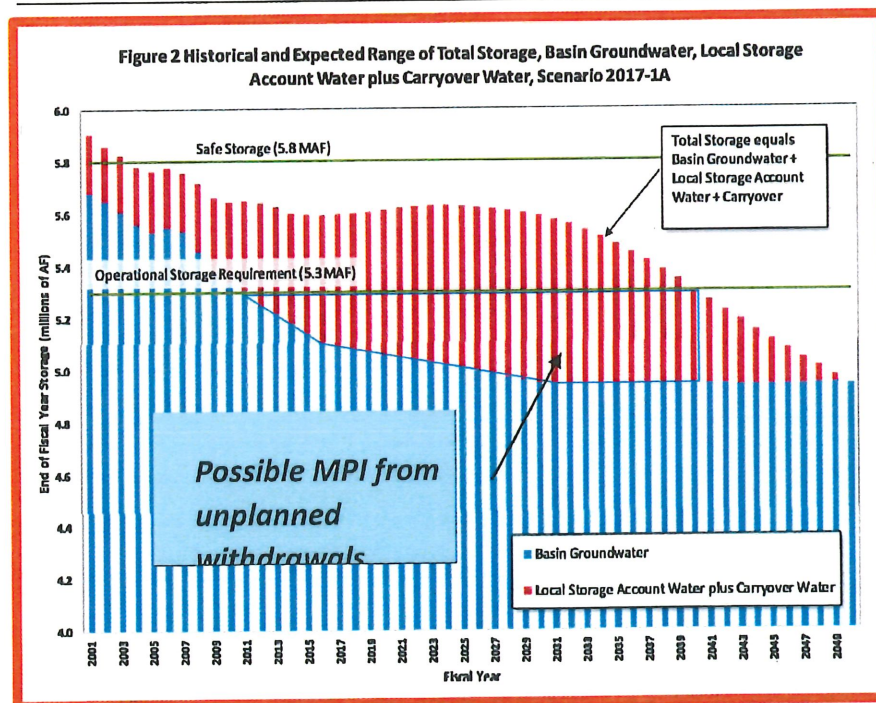
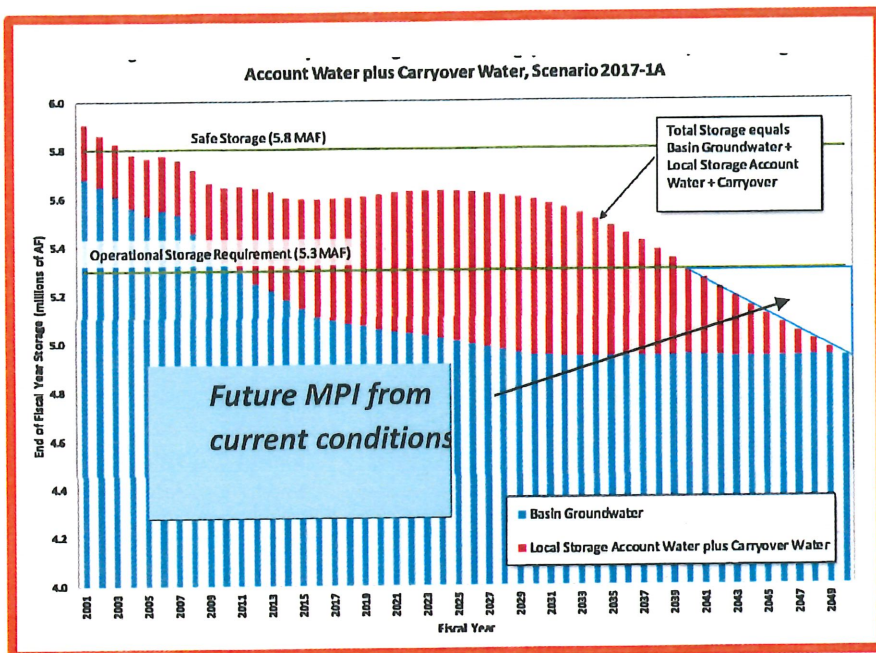


Exhibit B:
June 8, 2020 Appropriative Pool Request for
Continuance of Scheduled [Contest] Hearing

JOHN J. SCHATZ
ATTORNEY AT LAW
P.O. BOX 7775
LAGUNA NIGUEL, CA. 92607-7775
(949) 683-0398
Facsimile: (949) 305-6865
Email: jschatz13@cox.net

June 8, 2020

Mr. Peter Kavounas
General Manager
Chino Basin Watermaster
9641 San Bernardino Road
Rancho Cucamonga, CA 91730
Via Email

**Re: In the Matter Of Overlying (Agricultural) Pool Committee's January 2, 2020
Amendment to Its July 12, 2018 Consolidated and Amended Contest to Applications for
Storage Agreements and Sale or Transfer; Overlying (Agricultural) Pool Committee's
February 18, 2020 Second Amendment to the Amended and Consolidated Contest to
Applications for Water Transactions**

**Appropriative Pool Committee (Applicants) Request for Continuance of Scheduled
Hearing**

Dear Mr. Kavounas:

Pursuant to Watermaster Rules and Regulations Section 10.15¹, the Appropriative Pool (AP) requests your consideration of a continuance of the scheduled June 16, 2020 Hearing. Good cause exists to continue the Hearing for the following reasons.

1. Over the last several months, the AP has focused its attention and resources on Watermaster Board approval of the 2020 Storage Management Plan, related Optimum Basin Management Plan Implementation Plan for Program Elements 8 and 9 (OBMP IP), and 2020 Safe Yield Reset/Recalculation (2020 SYR) rather than the Contest. This is because the AP understood until very recently that Watermaster Board approval of the 2020 Storage Management Plan with at least the AP's distribution of the OBMP IP would render the Ag Pool contest irrelevant². The 2020 Storage Management Plan was approved by the Watermaster Board at its May 28, 2020 meeting. The Watermaster Board adopted a resolution at its May 22, 2020 special meeting approving the 2020 SYR and has accordingly filed a motion with the Court that is set for hearing on June 26, 2020. The AP should not be prejudiced concerning adequate time to prepare for the Contest by its focus on and extensive efforts to reach consensus concerning the 2020 Storage

¹ "An Applicant or Contestant may request an extension of time to file a Contest and Answer or for a continuance of a scheduled hearing and the request may be granted by Watermaster staff where good cause exists."

² Indeed, Ag legal counsel stated in a March 28, 2020 email to the Hearing Officer that approval of the Storage Management Plan "would render the Ag Pool contest irrelevant".

Management Plan, OBMP IP and 2020 SYR because of its good faith reliance on Ag's representations.

2. The Ag Pool's May 14, 2020 closed session reportable action stated: "the Ag Pool opposes the 2020 Storage Management Plan due to deficiencies in the interrelated Safe Yield Recalculation in addition to the lack of a storage implementation plan." As it appears Ag is conflating storage management and the 2020 SYR, the AP requires additional time to prepare for the Contest given the substantial amount of documents and materials that must be reviewed and analyzed not only regarding storage management but the 2020 SYR.
3. Given Ag's recent conflation of storage management and SYR, it is expected that Watermaster will be required to devote substantially more time to the Contest³.
4. With the AP's May 27, 2020 distribution of the OBMP IP, solicitation of comments from Watermaster and Watermaster parties and upcoming discussions concerning the negotiation process, extensive time and resources are required to complete the OBMP IP.
5. Watermaster and Watermaster parties are preparing for the 2020 SYR Motion that is presently set for Court hearing on June 26, 2020⁴. This competes with time and resources required for the Contest hearing. If, as Ag contends, storage management and Safe Yield Recalculation are interrelated, it appears enabling Watermaster and the parties to focus on the SYR hearing may be important for purposes of the Contest.
6. Based on the AP's March 27, 2020 email to Hearing Officer Mr. Berchtold noting circumstances related to the COVID-19 virus, it appears his decision to set the Contest hearing date in June instead of May as originally proposed was in part based on the possibility that COVID-19 protocol may no longer be in place in June. It is preferable for purposes of efficiency, practicality and promoting the efficacy and integrity of the proceeding to conduct the hearing in-person.
7. Continuance of the Contest hearing is without prejudice to the Ag Pool. It is AP members who are affected by the pendency of the Contest.
8. There is no exigency requiring the Contest to immediately proceed.
9. The AP waives completion of the Contest hearing and related actions within 180 days as otherwise required by Watermaster Rules and Regulations Section 10.25(g).

///

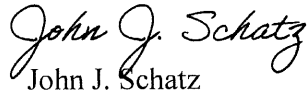
³ Watermaster Rules and Regulations Section 10.24(h), for example, provides in part: "Watermaster staff and consultants may participate in the hearing as appropriate, using their technical knowledge and experience for the primary purpose of developing a full, fair and accurate record, including the questioning of any witness or the agents for any party to the proceeding." This provision suggests Watermaster's preparation for and participation in the Contest requires substantial time and resources.

⁴ Several other Watermaster items are on the Court's June 26th calendar, requiring time for preparation by Watermaster, the AP and AP members.

JOHN J. SCHATZ
ATTORNEY AT LAW

With respect to the continued Contest hearing date, the later of 60 days or Watermaster's determination of its available resources considering the circumstances cited above is requested.

Sincerely,

A handwritten signature in black ink that reads "John J. Schatz". The signature is written in a cursive, flowing style.

John J. Schatz
Appropriative Pool Counsel

Copy To: Attached Service List

Overlying (Agricultural) Pool Committee's January 2, 2020 Amendment to Its July 12, 2018 Consolidated and Amended Contest to Applications for Storage Agreements and Sale or Transfer and the Overlying (Agricultural) Pool Committee's February 18, 2020 Second Amendment to the Amended and Consolidated Contest to Applications for Water Transactions

Service List

Tracy Egoscue
Egoscue Law Group, Inc.
Email: tracy@egoscuelaw.com

John Schatz
John J. Schatz, Attorney at Law
Email: jschatz13@cox.net

Kurt Berchtold
Hearing Officer
Email: kberchtold@gmail.com

Peter Kavounas
Chino Basin Watermaster
Email: pkavounas@cbwm.org

Bradley J. Herrema
Brownstein Hyatt Farber Schreck, LLP
Email: bherrema@bhfs.com

21018708

CHINO BASIN WATERMASTER
Case No. RCVRS 51010
Chino Basin Municipal Water District v. City of Chino, et al.

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 June 19, 2020 I served the following:

1. AGRICULTURAL POOL'S OBJECTION TO JURUPA COMMUNITY SERVICES DISTRICT'S REQUEST FOR CONTINUANCE OF WATERMASTER MOTION REGARDING 2020 SAFE YIELD RESET, AMENDMENT OF RESTATED JUDGMENT, PARAGRAPH 6
2. DECLARATION OF TRACY J. EGOSCUE IN SUPPORT OF AGRICULTURAL POOL'S OBJECTION TO JURUPA COMMUNITY SERVICES DISTRICT'S REQUEST FOR CONTINUANCE OF WATERMASTER MOTION REGARDING 2020 SAFE YIELD RESET, 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

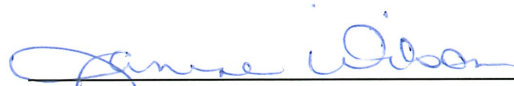
/ ___ / BY PERSONAL SERVICE: I caused such envelope to be delivered by hand to the addressee.

/ ___ / 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 June 19, 2020 in Rancho Cucamonga, California.



By: Janine Wilson
Chino Basin Watermaster

BRIAN GEYE
CA SPEEDWAY CORPORATION
9300 CHERRY AVE
FONTANA, CA 92335

BOB KUHN
THREE VALLEYS MWD
669 HUNTERS TRAIL
GLEN DORA, CA 91740

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

STEVE ELIE
IEUA
17017 ESTORIL STREET
CHINO HILLS, CA 91709

JEFF PIERSON
INTEX PROPERTIES CORP.
PO BOX 1440
LONG BEACH, CA 90801-1440

PAUL HOFER
CBWM BOARD MEMBER
11248 S TURNER AVE
ONTARIO, CA 91761

DON GALLEANO
WMWD
4220 WINEVILLE ROAD
MIRA LOMA, CA 91752

ALLEN HUBSCH
LOEB & LOEB LLP
10100 SANTA MONICA BLVD.
SUITE 2200
LOS ANGELES, CA 90067

BOB FEENSTRA
2720 SPRINGFIELD ST,
ORANGE, CA 92867

Members:

Agnes Cheng
Al Lopez
Alan Frost
Alberto Mendoza
Alfonso Ruiz
Allen W. Hubsch
Alonso Jurado
Amanda Coker
Amer Jakher
Amy Bonczewski
Andrea Olivas
Andrew Gagen
Andrew Silva
Andy Campbell
Andy Malone
Angelica Todd
Anna Nelson
April Robitaille
April Woodruff
Arnold Rodriguez
Art Bennett
Arthur Kidman
Ashok Dhingra
Ben Lewis
Ben Peralta
Benjamin M. Weink (ben.weink@tetrattech.com)

agnes.cheng@cc.sbcounty.gov
alopez@wmwd.com
Alan.Frost@dpw.sbcounty.gov
Alberto.Mendoza@cmc.com
alfonso.ruiz@cmc.com
ahubsch@loeb.com
ajurado@cbwm.org
acoker@cityofchino.org
AJakher@cityofchino.org
ABonczewski@ontarioca.gov
aolivas@jcsd.us
agagen@kidmanlaw.com
Andrew.Silva@cao.sbcounty.gov
acampbell@ieua.org
amalone@weiwater.com
angelica.todd@ge.com
atruongnelson@cbwm.org
arobitaille@bhfs.com
awoodruff@ieua.org
jarodriguez@sarwc.com
citycouncil@chinohills.org
akidman@kidmanlaw.com
ash@akdconsulting.com
benjamin.lewis@gswater.com
bperalta@tvmwd.com

ben.weink@tetrattech.com
banderson@jcsd.us
bbowcock@irmwater.com
rjdiprimio@sgvwater.com
bobfeenstra@gmail.com
bgkuhn@aol.com
bkuhn@tvmwd.com
Bob.Page@rov.sbcounty.gov
bherrema@bhfs.com
bradeny@cvwdwater.com
brahoward@niagarawater.com
balee@fontanawater.com
byamasaki@mwdh2o.com
bdickinson65@gmail.com
bgeye@autoclubspeedway.com
blee@sawaterco.com
memphisbelle38@outlook.com
carmens@cvwdwater.com
cbennett@tkeengineering.com
Carol.Boyd@doj.ca.gov
csanchez@weiwater.com
ccosta@chinodesalter.org
chooks@niagarawater.com
cirvine@DowneyBrand.com
cblais@ci.norco.ca.us

Betty Anderson
Bob Bowcock
Bob DiPrimio
Bob Feenstra
Bob Kuhn
Bob Kuhn
Bob Page
Brad Herrema
Braden Yu
Brandon Howard
Brenda Fowler
Brent Yamasaki
Brian Dickinson
Brian Geye
Brian Lee
Cameron Andreasen
Carmen Sierra
Carol Bennett
Carol Boyd
Carolina Sanchez
Casey Costa
Cassandra Hooks
Catharine Irvine
Chad Blais

Charles Field
Charles Linder
Charles Moorrees
Chino Hills City Council (citycouncil@chinohills.org)

Chris Berch
Chris Diggs
Christiana Daisy
Christofer Coppinger
Christopher M. Sanders
Christopher Quach
Christopher R. Guillen
Chuck Hays
Cindy Cisneros
Cindy Li
Cinthia Heredia
Clarence Mansell
Courtney Jones
Craig Miller
Craig Stewart
Cris Fealy
Dan Arrighi
Dan McKinney
Daniel Bobadilla (dbobadilla@chinohills.org)

Dave Argo
Dave Crosley
David Aladjem
David De Jesus
David Doublet
David Huynh
David Penrice
Dennis Dooley
Dennis Mejia
Dennis Williams
Diana Frederick
Don Galleano
Ed Means
Edgar Tellez Foster
Eduardo Espinoza
Edward Kolodziej
Elizabeth Skrzat
Eric Fordham
Eric Garner
Eric Grubb
Eric Papathakis
Eric Tarango
Erika Clement
Eunice Ulloa
Evette Ounanian
Felix Hamilton
Frank Brommenschenkel
Frank Yoo

cdfield@att.net
Charles.Linder@nrgenergy.com
cmoorrees@sawaterco.com

citycouncil@chinohills.org
cberch@jcsd.us
Chris_Diggs@ci.pomona.ca.us
cdaisy@ieua.org
ccoppinger@geoscience-water.com
cms@eslawfirm.com
cquach@ontarioca.gov
cguillen@bhfs.com
chays@fontana.org
cindyc@cvwdwater.com
Cindy.li@waterboards.ca.gov
Cinthia.Heredia@cmc.com
cmansell@wwwd.org
cjjones@ontarioca.gov
CMiller@wmwd.com
craig.stewart@woodplc.com
cifealy@fontanawater.com
darrighi@sgwater.com
dmckinney@douglascountylaw.com

dbobadilla@chinohills.org
daveargo46@icloud.com
DCrosley@cityofchino.org
daladjem@downeybrand.com
ddejesus@tvmwd.com
ddoublet@dpw.sbcounty.gov
dhuynh@cbwm.org
dpenrice@acmwater.com
ddooley@angelica.com
dmejia@ontarioca.gov
dwilliams@geoscience-water.com
diana.frederick@cdcr.ca.gov
dongalleano@icloud.com
edmeans@roadrunner.com
etellezfoster@cbwm.org
EduardoE@cvwdwater.com
edward.kolodziej@ge.com
ESkrzat@cbwcd.org
eric_fordham@geopentech.com
eric.garner@bbklaw.com
ericg@cvwdwater.com
Eric.Papathakis@cdcr.ca.gov
edtarango@fontanawater.com
Erika.clement@sce.com
eulloa@cityofchino.org
EvetteO@cvwdwater.com
felixhamilton.chino@yahoo.com
frank.brommen@verizon.net
FrankY@cbwm.org

Fred Fudacz
Fred Galante
Gabby Garcia
Gailyn Watson
Garrett Rapp
Gene Tanaka
Geoffrey Kamansky
Geoffrey Vanden Heuvel
Gerald Yahr
Gina Nicholls
Gino L. Filippi
Greg Woodside
Henry DeHaan
Hope Smythe
Irene Islas
James Curatalo
James Jenkins
James McKenzie
Jane Anderson
Janelle Granger
Janine Wilson
Jasmin A. Hall
Jason L. Bishop
Jason Marseilles
Jason Pivovarov - Western Municipal Water District

Jean Cihigoyenetché
Jean Perry
Jeanina M. Romero
Jeff Evers
Jeffrey L. Pierson
Jennifer Hy-Luk
Jessie Ruedas
Jim Markman
Jim W. Bowman
Jimmy Gutierrez - Law Offices of Jimmy Gutierrez

Jimmy Medrano
jimmy@city-attorney.com
Joanne Chan
Joao Feitoza
Joe Graziano
Joe Joswiak
Joel Ignacio
John Abusham
John Bosler
John Harper
John Huitsing
John Lopez and Nathan Cole
John Mendoza
John Partridge
John Schatz
John Thornton

ffudacz@nossaman.com
fgalante@awattorneys.com
ggarcia@mwwd.org
gwatson@airports.sbcounty.gov
grapp@weiwater.com
Gene.Tanaka@bbklaw.com
gkamansky@niagarawater.com
geoffreyvh60@gmail.com
yahrj@koll.com
gnicholls@nossaman.com
Ginoffvine@aol.com
gwoodside@ocwd.com
Hdehaan1950@gmail.com
hsmythe@waterboards.ca.gov
irene.islas@bbklaw.com
jamesc@cvwdwater.com
cnomgr@airports.sbcounty.gov
jmckenzie@dpw.sbcounty.gov
janderson@jcsd.us
jgranger@niagarawater.com
JWilson@cbwm.org
jhall@ieua.org
jason.bishop@cdcr.ca.gov
jmarseilles@ieua.org

JPivovarov@wmwd.com
Jean@thejclawfirm.com
JPerry@wmwd.com
jromero@ontarioca.gov
jevers@niagarawater.com
jpierson@intexcorp.com
jhyluk@ieua.org
Jessie@thejclawfirm.com
jmarkman@rwglaw.com
jbowman@ontarioca.gov

jimmylaredo@gmail.com
Jaime.medrano2@cdcr.ca.gov
jimmy@city-attorney.com
jchan@wvwd.org
joao.feitoza@cmc.com
jgraz4077@aol.com
JJoswiak@cbwm.org
jignacio@ieua.org
john.abusham@nrg.com
johnb@cvwdwater.com
jrharp@harperburns.com
johnhuitsing@gmail.com
customerservice@sarwc.com
jmendoza@tvmwd.com
jpartridge@angelica.com
jschatz13@cox.net
JThorntonPE@H2OExpert.net

Jose Galindo
Josh Swift
Joshua Aguilar
Julie Saba
Justin Brokaw
Justin Nakano
Justin Scott-Coe Ph. D.
Karen Johnson
Kathleen Brundage
kberchtold@gmail.com
Keith Kramer
Keith Person
Kelly Berry
Ken Waring
Kevin O'Toole
Kevin Sage
Kimberly E. Leefatt
Kyle Snay
Larry Cain
Larry Rothman
Laura Mantilla
Lauren Harold
Linda Jadeski
Lisa Lemoine
Liz Hurst
Marco Tule
Maria Mendoza-Tellez
Maribel Sosa
Marilyn Levin
Mark D. Hensley
Mark Wildermuth
Mark Wiley
Martin Cihigoyenetché
Martin Rauch
Martin Zvirbulis
Mathew C. Ballantyne
Matthew H. Litchfield
May Atencio
Melissa L. Walker
Michael Adler
Michael Camacho
Michael Camacho
Michael P. Thornton
Michelle Licea
Michelle Staples - Jackson Tidus
Mike Blazevec
Mike Maestas
Moore, Toby
MWDProgram
Nadia Aguirre
Nadia Loukeh
Natalie Costaglio
Nathan deBoom

jose_a_galindo@praxair.com
jmswift@fontanawater.com
jaguilar@ieua.org
jsaba@jcsd.us
jbrokaw@marygoldmutualwater.com
JNakano@cbwm.org
jscottcoe@mvwd.org
kejwater@aol.com
kathleen.brundage@californiasteel.com
kberchtold@gmail.com
kkramer@fontana.org
keith.person@waterboards.ca.gov
KBerry@sawpa.org
kwaring@jcsd.us
kotoole@ocwd.com
Ksage@IRMwater.com
kleefatt@bhfs.com
kylesnay@gswater.com
larry.cain@cdcr.ca.gov
lawrence.rothman@cmc.com
lmantilla@ieua.org
lharold@liprop.com
ljadeski@wvwd.org
LLemoine@wmwd.com
ehurst@ieua.org
marco.tule@nrg.com
MMendoza@weiwater.com
msosa@ci.pomona.ca.us
marilyn.levin@doj.ca.gov
mhensley@hensleylawgroup.com
mwildermuth@weiwater.com
mwiley@chinohills.org
marty@thejclawfirm.com
martin@rauchcc.com
mezvirbulis@sgvwater.com
mballantyne@cityofchino.org
mlitchfield@tvmwd.com
matencio@fontana.org
mwalker@dpw.sbcounty.gov
michael.adler@mcmcn.net
Mcamacho@pacificaservices.com
mcamacho@ieua.org
mthornton@tkeengineering.com
mlicea@mvwd.org
mstaples@jacksontidus.law
mblazevec@weiwater.com
mikem@cvwdwater.com
TobyMoore@gswater.com
MWDProgram@sdca.org
naguirre@tvmwd.com
nloukeh@wvwd.org
natalie.costaglio@mcmcn.net
n8deboom@gmail.com

Neetu Gupta
Nick Jacobs
Nicole Escalante
Noah Golden-Krasner
Pam Wilson - Brownstein Hyatt Farber Schreck

Paul Hofer
Paul Hofer
Paul S. Leon
Paul.deutsch@tetrattech.com
Penny Alexander-Kelley
Pete Hall
Pete Hall
Pete Vicario
Peter Hettinga
Peter Kavounas
Peter Rogers
Praseetha Krishnan
Rachel Avila
Rachel Ortiz
Ramsey Haddad
Randy Visser
Ray Wilkings
Rick Darnell
Rick Rees
Rita Pro
Robert C. Hawkins
Robert DeLoach
Robert E. Donlan
Robert Neufeld
Robert Stockton
Robert Wagner
Robert_DeLoach@ci.pomona.ca.us
Ron Craig
Ron LaBrucherie, Jr.
Ronald C. Pietersma
Rosemary Hoerning
Ryan Shaw
Sally H. Lee
Sam I. Gershon
Sam Nelson
Sam Rubenstein (srubenstein@wpcarey.com)

Sandra S. Rose
Sarah Foley
Sarah Schneider
Scott Burton
Scott Slater
sdeshmukh@ieua.org
Seth J. Zielke
Shaun Stone
Shawnda M. Grady
Skylar Stephens

ngupta@ieua.org
njacobs@somachlaw.com
NEscalante@ontarioca.gov
Noah.goldenkrasner@doj.ca.gov

pwilson@bhfs.com
farmwatchtoo@aol.com
farmerhofer@aol.com
pleon@ontarioca.gov
Paul.deutsch@tetrattech.com
Palexander-kelley@cc.sbccounty.gov
pete.hall@cdcr.ca.gov
rpetehall@gmail.com
PVicario@cityofchino.org
peterhettinga@yahoo.com
PKavounas@cbwm.org
progers@chinohills.org
praseethak@cvwdwater.com
R.Avila@MPGLAW.com
rortiz@nossaman.com
ramsey.haddad@californiasteel.com
RVisser@sheppardmullin.com
rwilkins@autoclubspeedway.com
Richard.Darnell@nrgenergy.com
richard.rees@woodplc.com
rpro@cityofchino.org
RHawkins@earthlink.net
robertadeloach1@gmail.com
red@eslawfirm.com
robneu1@yahoo.com
bstockton@wmwd.com
rwagner@wbecorp.com
Robert_DeLoach@ci.pomona.ca.us
Rcraig21@icloud.com
ronLaBrucherie@gmail.com
rcpietersma@aol.com
rhoerning@ci.upland.ca.us
RShaw@wmwd.com
shlee@ieua.org
sam.gershon@webbassociates.com
snelson@ci.norco.ca.us

srubenstein@wpcarey.com
directorrose@mvwd.org
Sarah.Foley@bbklaw.com
sarah.schneider@amec.com
sburton@ontarioca.gov
sslater@bhfs.com
sdeshmukh@ieua.org
sjzielke@fontanawater.com
stones@emwd.org
sgrady@eslawfirm.com
SStephens@sdewa.org

Sonya Barber
Sonya Zite (szite@wmwd.com)
Steve Kennedy
Steve M. Anderson
Steve Riboli
Steve Smith
Steve W. Ledbetter, PE
Steven Andrews Engineering
Steven J. Elie
Steven J. Elie
Steven Popelar
Susan Palmer
Sylvie Lee
Tamer Ahmed
Taya Victorino
Teri Layton
Terry Bettencourt
Terry Catlin
Tim Barr
Tim Kellett
Timothy Ryan
Toby Moore (TobyMoore@gswater.com)
Todd Minten
Tom Bunn
Tom Cruikshank - Link Industrial Properties

Tom Harder
Tom Haughey
Tom McPeters
Tom O'Neill
Toni Medell
Tony Long
Tracy J. Egoscue
Trish Geren
Van Jew
Vanessa Aldaz
Vanessa Campos
Veva Weamer
Victor Preciado
Vivian Castro
WestWater Research, LLC
William J Brunick
William Urena

sbarber@ci.upland.ca.us
szite@wmwd.com
skennedy@bmklawplc.com
steve.anderson@bbklaw.com
steve.riboli@sanantoniowinery.com
ssmith@ieua.org
sledbetter@tkeengineering.com
sandrews@sandrewsengineering.com
s.elie@mpglaw.com
selie@ieua.org
spopelar@jcsd.us
spalmer@kidmanlaw.com
slee@ieua.org
tamer.ahmed@cdcr.ca.gov
tayav@cvwdwater.com
tlayton@sawaterco.com
miles.bettencourt@cdcr.ca.gov
tcatlin@wfajpa.org
tbarr@wmwd.com
tkellett@tvmwd.com
tjryan@sgvwater.com
TobyMoore@gswater.com
tminten@chinodesalter.org
TomBunn@Lagerlof.com

tcruikshank@liprop.com
tharder@thomashardercompany.com
Thaughey@cityofchino.org
THMcP@aol.com
toneill@chinodesalter.org
mmedel@mbakerintl.com
tlong@angelica.com
tracy@egoscuelaw.com
tgeren@sheppardmullin.com
vjew@mvwd.org
valdaz@cbwm.org
VCampos@ontarioca.gov
vweamer@weiwater.com
Victor_Preciado@ci.pomona.ca.us
vcastro@cityofchino.org
research@waterexchange.com
bbrunick@bmblawoffice.com
wurena@angelica.com