

FEE EXEMPT

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13 **CHINO BASIN WATERMASTER**

14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
15 **FOR THE COUNTY OF SAN BERNARDINO**

16 CHINO BASIN MUNICIPAL WATER
17 DISTRICT,

18 Plaintiff,

19 v.

20 CITY OF CHINO, ET AL.,

21 Defendants.

Case No. RCV RS 51010

[Assigned for All Purposes to the
Honorable Gilbert G. Ochoa]

**NOTICE OF MOTION AND MOTION FOR
COURT APPROVAL OF UPDATE TO
WATERMASTER SAFE YIELD RESET
METHODOLOGY**

Date: December 16, 2022
Time: 9:00 a.m.
Dept.: S24

*[Declarations of Garrett Rapp and Peter
Kavounas, in Support of Motion for Court
Approval of Update to Watermaster Safe Yield
Reset Methodology; and [Proposed] Order filed
concurrently herewith]*

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TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on December 16, 2022, at 9:00 a.m., or as soon thereafter as the matter may be heard, in Department S24 of the above-entitled Court located at 247 West Third Street, San Bernardino, California 92415, the Chino Basin Watermaster (“Watermaster”) will and hereby does move this Court, pursuant to this Court’s April 28, 2017 Order (“2017 Order”) resetting the Safe Yield of the Chino Basin (the “Basin”), for approval of the 2022 Update to the Chino Basin Watermaster Safe Yield Reset Methodology (the “Motion”). This request is made pursuant to the Court’s continuing jurisdiction and authority to make such further or supplemental orders or directions as may be necessary or appropriate for interpretation, enforcement, or carrying out of the Restated Judgment, and this Court’s 2017 Order, as confirmed by the Court in its March 15, 2019 Findings and Order Regarding Amendments to Restated Judgment, Peace Agreement, Peace II Agreement, and Re-Operation Schedule.

This Motion is based upon this Notice of Motion and Motion, the attached Memorandum of Points and Authorities, the pleadings, records, and files in this action, and upon such oral argument and other evidence as may be presented at the hearing on the Motion. As described in the Declaration of Peter Kavounas in support of Motion for Court Approval of the Update to Watermaster Safe Yield Reset Methodology, the filing of this motion was directed by the Watermaster Board at its September 22, 2022 regular meeting.

Pursuant to Paragraph 15 of the Restated Judgment, Watermaster has served Notice of this Motion on the Parties to this action on November 15, 2022, more than 30 days prior to the December 16, 2022 hearing date.

Dated: November 15, 2022

BROWNSTEIN HYATT FARBER
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By: 
SCOTT S. SLATER
BRADLEY J. HERREMA
LAURA K. YRACEBURU
Attorneys for CHINO BASIN
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1 MEMORANDUM OF POINTS AND AUTHORITIES

2 I. INTRODUCTION

3 One of the primary purposes of the Judgment and responsibilities of Watermaster is to
4 administer the decree, manage the Chino Groundwater Basin (“Basin”), and optimize the resource
5 for the benefit of the parties and in the public interest. Common law and the Judgment¹ itself
6 define “Safe Yield” as the amount of “groundwater” that can be withdrawn from the Basin on an
7 annual basis without causing an “undesirable result.”² An initial Safe Yield was established in
8 1978 upon entry of the Judgment, but the Court maintained continuing jurisdiction to adjust the
9 Safe Yield in the future.

10 On April 28, 2017, this Court adopted a new Safe Yield for the first time, ordered
11 Watermaster to again recalculate Safe Yield in 2020 for the ensuing decade, and permitted future
12 updates to incorporate best practices. In the course of the 2020 Safe Yield reset process, the Court
13 further adjusted the Safe Yield downward and required that Watermaster take into account then
14 prevailing best management practices and advances in hydrological science in the subsequent
15 required update. Watermaster’s recommendations as to the Safe Yield are heavily driven by data
16 and analysis and, in particular, the reliance on a robust and comprehensive groundwater model
17 developed over decades. The matter currently before the Court arises from a shared interest in a
18 carefully and meticulously derived Safe Yield, as it may change over time due to variable
19 conditions, always with an eye towards optimizing the resource and avoiding harm.

20 The specific proposal described herein would update the technical Safe Yield reset
21 methodology to include an “uncertainty analysis.” After thorough review by each of the three
22 Pools, the Advisory Committee, and without objection by any party to the Judgment,
23 Watermaster respectfully requests the Court approve the proposed revisions to the methodology,

24 _____
25 ¹ On September 27, 2012, the Court ordered that the Restated Judgment, incorporating all
26 amendments since 1978, shall serve as the official and legally operative copy of the 1978
27 Judgment. All references to the Judgment refer to the Restated Judgment.

28 ² The Judgment defines Safe Yield as: "The long-term average annual quantity of
ground water (excluding replenishment or stored water but including return flow to the Basin
from use of replenishment or stored water) which can be produced from the Basin under cultural
conditions of a particular year without causing an undesirable result." (Judgment, ¶
4(x); see *Los Angeles v. San Fernando* (1975) 14 Cal.3d 199.)

1 inclusive of the “uncertainty analysis,” in fulfillment of Watermaster’s responsibility to comply
2 with best practices and prior Court orders.

3 **II. BACKGROUND**

4 **A. Chino Basin and Watermaster Background³**

5 Watermaster is the Court’s special master for the purposes of the administration and
6 enforcement of the Judgment. (Judgment, ¶ 16.) The Judgment established three pools for
7 Watermaster administration of, and for the allocation of responsibility for, and payment of, costs
8 of replenishment water and other aspects of the Physical Solution. (Judgment, ¶ 43.) The
9 Judgment further directed the organization of groundwater producer representatives into Pool
10 Committees to develop policy recommendations for administration of the pool and provide advice
11 and direction to Watermaster implementation of the Judgment. (Judgment, ¶¶ 32, 38.) The three
12 Pool Committees jointly form the Advisory Committee, which has “the duty to study, and the
13 power to recommend, review and act upon all discretionary determinations made or to be made
14 hereunder by Watermaster.” (Judgment, ¶¶ 32, 38(b).)

15 **B. Watermaster Safe Yield Reset Methodology**

16 The Judgment set the initial Safe Yield for the Basin at 140,000 acre-feet per year
17 (“AFY”) but contemplated that the Safe Yield might be reset as changing conditions in the Basin
18 warrant. (Judgment, ¶¶ 6, 15(a).) A process to address how and when that might be done became
19 a subject of a motion by Watermaster and subsequent Court Order in July of 2000, implementing
20 an agreement among all Parties to the Judgment requiring Watermaster to evaluate and reset the
21 Basin’s Safe Yield every ten years. (Peace Agreement, Exh. B [Optimum Basin Management
22 Program Implementation Plan⁴], p. 44-45; Order Concerning Adoption of OBMP, dated July 13,
23 2000, p. 4; see Watermaster Rules and Regulations, § 6.5(b).)

24
25 _____
26 ³ A more robust summary of Chino Basin and Watermaster background and Judgment structure is
27 included in Watermaster’s Opposition to Motion Challenging Watermaster’s Budget Action to
28 Fund Unauthorized CEQA Review, filed with this Court on October 3, 2022.

⁴ The Optimum Basin Management Program Implementation Plan is included as Exhibit A to the
Declaration of Peter Kavounas in Support of Motion for Court Approval of Update to
Watermaster Safe Yield Reset Methodology (“Kavounas Declaration”) or (“Kavounas Decl.”).

1 The Court’s 2017 Order⁵ addressed a lengthy and extended effort to conduct the required
2 first reset of the Safe Yield approved a specific Safe Yield Reset Methodology⁶ relied upon by
3 Watermaster to calculate Safe Yield. (2017 Order, p. 16.) That order further provided

4 In furtherance of the goal of maximizing the beneficial use of the
5 waters of the Chino Basin, Watermaster, with the recommendation
6 and advice of the Pools and Advisory Committee, may supplement
7 the [Safe Yield Reset Methodology] to incorporate future advances
8 in best management practices and hydrologic science as they evolve
9 over the term of this order. (*Ibid.*)

10 Pursuant to the express provisions of the 2017 Order, Watermaster completed a further
11 recalculation in 2020 and the Court approved Watermaster’s recommended adjustment of the
12 Safe Yield to 131,000 AFY. (Orders Re Chino Basin Watermaster Motion Regarding 2020 Safe
13 Yield Reset, Amendment of Restated Judgment, Paragraph 6 [“2020 Order”], pp. 14-15.) Facing
14 a responsibility to prospectively determine whether further adjustments will be required,
15 Watermaster requests that the Court to approve the 2022 Update to the Chino Basin Watermaster
16 Safe Yield Reset Methodology (“2022 SYRMU”), to incorporate an analysis of “uncertainty”, as
17 requested by Parties to the Judgment, to provide a more accurate and holistic analysis in the
18 upcoming 2025 Safe Yield Reevaluation (“2025 Reevaluation”).

19 The proposed 2022 SYRMU is attached as Exhibit A to the Declaration of Garrett Rapp,
20 an groundwater expert modeler, in Support of Motion for Court Approval of Update to
21 Watermaster Safe Yield Reset Methodology (“Rapp Declaration” or “Rapp Decl.”). A redline
22 comparison of the proposed 2022 SYRMU to the current Safe Yield Reset Methodology (“SYR
23 Methodology”) is attached as Exhibit B to the Rapp Declaration. The 2022 SYRMU Technical
24 Memorandum, describing the process through which the recommended 2022 SYRMU was
25 developed (“2022 SYRMU TM”), is attached as Exhibit D to the Rapp Declaration.

26 For the ten-year-period for which the Safe Yield must be reevaluated next, (July 1, 2030
27 to June 30, 2040) the reset process must commence no later than July 1, 2028 (“2030 Reset”).

28 ⁵ The 2017 Order is included as is included as Exhibit B to the Kavounas Declaration.
⁶ The Safe Yield Reset Methodology (“SYR Methodology”) is the procedure used to recalculate
the Safe Yield at ten-year intervals, pursuant to the OBMP Implementation Plan and
Watermaster’s Rules and Regulations. (See Rapp Decl., Exh. C [2015 Safe Yield Reset Technical
Memorandum], p. 2.)

1 (2020 Order, p. 15.) Prior to the 2030 Reset, Watermaster is required to update and evaluate the
2 Safe Yield using that updated model, no later than June 30, 2025.⁷ (2017 Order, p. 17.) The 2025
3 Reevaluation of the Safe Yield must be initiated no later than January 1, 2024. (*Ibid.*) Thus, to
4 timely perform its obligation, Watermaster’s technical consultants must understand now whether
5 any changes are to be made in the Safe Yield Reset Methodology to timely update to the Basin
6 model in advance of the 2025 Reevaluation. (Rapp Decl., ¶ 8.)

7 For the Court’s convenience, a condensed timeline summary of the history and next steps
8 regarding the Basin’s Safe Yield is as follows:

- 9 • 1978 Safe Yield of 140,000 AFY is established, Court maintains continuing
10 jurisdiction (Judgment, ¶ 15(a))
- 11 • July 13, 2000 Order Adopting the Optimum Basin Management Program
12 (“OBMP”) Implementation Plan and Watermaster’s Rules and Regulations (“2000
13 Order”), providing for re-evaluating the Safe Yield in year 2010/11, and every ten
14 years thereafter (2000 Order, p. 4; see OBMP Implementation Plan, p. 44-45;
15 Watermaster Rules and Regulations §6.5)
- 16 • 2017 Order resetting Safe Yield downward to 135,000 AFY and requiring
17 Watermaster to recalculate and reset the Safe Yield using the Court-approved SYR
18 Methodology outlined in the August 10, 2015 Safe Yield Reset Technical
19 Memorandum⁸ (OBMP Implementation Plan, p. 44-45; Watermaster Rules and
20 Regulations §6.5; 2017 Order, pp. 15, 18)
- 21 • 2020 Order, over limited opposition,⁹ approving Watermaster’s recommendation

22
23 ⁷ Pursuant to the 2017 Order, the OBMP Implementation Plan, and Watermaster Rules and
24 Regulations, if the 2025 Evaluation evidence a change in the Safe Yield by an amount greater
(more or less) than 2.5% of the then-effective Safe Yield, the Safe Yield may be reset. (2017
25 Order at pp. 15-16; OBMP Implementation Plan, p. 44; Rules and Regulations, § 6.5.)

26 ⁸ The SYR Methodology specified in the 2017 Order was reaffirmed by the March 15, 2019
27 Findings and Order Regarding Amendments to Restated Judgment, Peace Agreement, Peace II
28 Agreement, and Re-Operation Schedule. The Court’s March 15, 2019 Findings and Order
Regarding Amendments to Restated Judgment, Peace Agreement, Peace II Agreement, and Re-
Operation Schedule is included as Exhibit C to the Kavounas Declaration.

⁹ See City of Chino’s Opposition to Chino Basin Watermaster’s Motion Regarding 2020 Safe
Yield Reset, Amendment of Restated Judgment, Paragraph 6, dated June 15, 2020 (“Chino Oppn.
2020 Reset”); Agricultural Pool’s Opposition to Watermaster Motion Regarding 2020 Safe Yield

1 and further reducing the Safe Yield to 131,000 AFY for years July 1, 2020 to June
2 30, 2030 and requiring Watermaster to comply with “best practices” in future
3 recalculations (2020 Order, p. 15)

- 4 • No later than January 1, 2024, initiation of the 2025 Reevaluation of Safe Yield
5 (2017 Order, p. 17.)
- 6 • By June 30, 2025, Watermaster must update the Basin model and model
7 evaluation of the Safe Yield (2017 Order, p. 17)
- 8 • By July 1, 2028, Watermaster must *commence* the 2030 Reset (2020 Order, p. 15)

9 **C. Process and Development of the 2022 SYRMU and Inclusion of the**
10 **Uncertainty Analysis**

11 The suggested “uncertainty analysis” in the 2022 SYRMU arises out of the discussions
12 during the 2020 Reset process.

13 1. **Comments Received During the 2020 Reset Process Recommended**
14 **“Uncertainty Analysis”**

15 During the 2020 Reset process described above, interested parties submitted comments in
16 writing or during three workshops conducted by Watermaster. Chino Basin Watermaster Motion
17 Regarding 2020 Safe Yield Reset, Amendment of Stated Judgment, Paragraph 6, dated May 27,
18 2020 [“2020 SYR Motion”], p. 14.) The Parties’ comments, along with Watermaster’s responses,
19 were incorporated as an appendix to the final report. (2020 SYR Motion, p. 14.)

20 Comments specifically recommended that the SYR Methodology be modified to include
21 an “uncertainty analysis,” described as a widely accepted Best Management Practice, provided
22 input as to what such an analysis would look like, and identified several benefits to the parties.
23 (Kavounas Decl., ¶ 7.) Watermaster proposed to consider best practices in future resets and the
24 Court agreed, approving the 2020 Reset and affirmed Watermaster’s obligation to “tak[e] into
25 account then prevailing best management practices and advances in hydrological sciences” in the
26 next Safe Yield reset process beginning July 1, 2028. (2020 Order, pp. 14-15.)

27
28 _____
Reset, Amendment of Restated Judgment, Paragraph 6, dated June 15, 2020.

1 The Appropriative Pool’s technical expert sent a letter to Watermaster on February 3,
2 2020 raising concerns with “considerable uncertainty” in the models. (See Declaration of Mark
3 Wildermuth in support of 2020 SYR Motion [Wildermuth Decl. 2020 SYR Motion], Exh. B, p.
4 601.) The Appropriative Pool’s technical expert sent a second letter to Watermaster on April 23,
5 2020 regarding Technical Review of the Models and Methodology Used as a Basis for the 2020
6 Safe Yield Reset, which again raised concerns regarding the need for a predictive uncertainty
7 analysis. (See Wildermuth Decl. 2020 SYR Motion, Exh. B, pp. 652, 653, 663, 664, 667, 669,
8 674, 675.)

9 The City of Chino (“Chino”) opposed Watermaster’s 2020 SYR Motion, arguing for
10 changes to the SYR Methodology, including the recommendation to update the methodology to
11 address uncertainty in the Safe Yield Reset modeling process. (Kavounas Decl., ¶ 8.) Chino
12 stated that uncertainty analysis is “standard engineering practice”, that it “...is necessary to
13 complete... an uncertainty analysis”, and that “[w]ithout . . . a plausible range of Safe Yield
14 estimates . . . [Watermaster and the Parties] cannot confidently ascertain what the Safe
15 Yield...should be.” (Chino Oppn. 2020 Reset, pp. 1, 2; Declaration of David Crosley in Support
16 of Chino Oppn. 2020 Reset, ¶ 8.)

17 **2. Scope and Budget for the 2022 SYRMU**

18 In order for the SYR Methodology to be clear prior to the 2025 Reevaluation, and in
19 response to the parties’ recommendations and pursuant to the 2017 Order, Watermaster has
20 undertaken an effort to evaluate possible updates to the current SYR Methodology. Watermaster
21 included revisions of the SYR Methodology to include an “uncertainty analysis” in the budget for
22 fiscal year 2021/22 and provided parties the opportunity to comment on the proposed budget from
23 March 23, 2021 to May 13, 2021. (Kavounas Decl., ¶ 10.) Watermaster also hosted two budget
24 workshops in April 2021. (Kavounas Decl., ¶ 10.) The FY 2021/2022 budget was adopted by the
25 Board as approved by the Advisory Committee in May 2021 without funds for the Safe Yield
26 Court Order Implementation – including the development of the 2022 SYRMU. (Kavounas Decl.,
27 ¶ 11.) The budget was approved without the funds for the Safe Yield Court Order Implementation
28 by request of the Monte Vista Water District who requested those funds be considered separately.

1 (Kavounas Decl., ¶ 11.) In July 2021, the Watermaster Board approved a budget amendment and
2 directed staff to resolve outstanding issues raised by the Appropriative Pool regarding the scope
3 and budget of the Safe Yield Court Order Implementation. (Kavounas Decl., ¶ 12.) Watermaster
4 staff and technical consultants met with representatives from the Appropriative Pool on August 3,
5 2021 to resolve issues raised with the scope and budget for the Safe Yield Court Order
6 Implementation. (Kavounas Decl., ¶ 13.)

7 Following a special Appropriative Pool Committee meeting in August 2021, the Advisory
8 Committee and Watermaster Board approved a budget amendment in September 2021, which
9 provided for development of an initial technical memorandum describing the issue of model
10 uncertainty, generally, and its application to the Chino Valley Model, specifically, and to
11 facilitate peer review meetings prior to developing the 2022 SYRMU. (Kavounas Decl., ¶ 14.)
12 Pursuant to this direction, Watermaster released an overview of the potential updates to the SYR
13 Methodology on October 21, 2021 and, on October 26, 2021, held a peer review workshop to
14 gather feedback from the Parties regarding the scope of the 2022 SYRMU. (Kavounas Decl., ¶
15 15.) Feedback received at the October 2021 peer review workshop and subsequent comment
16 period from October 29, 2021 to November 11, 2021 was incorporated into the revised scope and
17 budget reviewed at the November 2021 Pool and Advisory Committee meetings and Board
18 meeting. (Kavounas Decl., ¶ 16.) The Advisory Committee approved, and the Watermaster Board
19 adopted, the final 2022 SYRMU scope and budget in November 2021. (Kavounas Decl., ¶ 17.)

20 During the budget process for fiscal year 2022/23, Watermaster received and responded in
21 writing to written comments from Monte Vista Water District regarding the budget and scope of
22 the Safe Yield Court Order Implementation. (Rapp Decl., ¶ 10.) Watermaster staff and its
23 engineer also met with Appropriative Pool representatives on February 24, 2022 to discuss their
24 feedback. (Rapp Decl., ¶ 11.) In May 2022, the Watermaster Board adopted the fiscal year
25 2022/23 budget as approved by the Advisory Committee, including the budget for the Safe Yield
26 Court Order Implementation. (Rapp Decl., ¶ 12.)

27 **3. 2022 SYRMU Technical Memorandum**

28 The 2022 SYRMU TM details the process and rationale for the 2022 SYRMU by

1 presenting an overview of the uncertainty in surface-water and groundwater modeling, discussing
2 the uncertainties associated with the current SYR Methodology, identifying and analyzing
3 potential approaches for addressing the current SYR Methodology uncertainties, and then
4 summarizing the recommended 2022 SYRMU changes and comparing those changes to the
5 current SYR Methodology. The 2022 SYRMU TM also includes a detailed cost estimate and
6 schedule implementing the 2022 SYRMU and using it for the 2025 Reevaluation and future Safe
7 Yield resets.

8 **4. Watermaster’s Additional Workshops Regarding the Proposed 2022 SYRMU**

9 On May 12, 2022, Watermaster released the initial draft 2022 SYRMU Technical
10 Memorandum (“2022 SYRMU TM”), and requested feedback from the parties for a six-week
11 period concluding on June 24, 2022. (Rapp Decl., ¶ 13.) Watermaster held another peer review
12 workshop and held a non-technical workshop for the Parties to explain the proposed updated
13 methodology. (Rapp Decl., ¶ 14.) Following comments received at the workshops and during the
14 comment period, Watermaster revised and re-released the draft 2022 SYRMU TM on July 12,
15 2022, extending the comment period to August 5, 2022. (Rapp Decl., ¶ 15.) Watermaster held a
16 third peer review workshop on July 20, 2022 . (Rapp Decl., ¶ 16.) The Appropriative Pool
17 requested additional details on the process to implement the 2022 SYRMU which subsequently
18 effected a follow-up phone call with Watermaster staff, Watermaster’s technical consultant staff,
19 and the Appropriative Pool's technical experts to address their specific comments. (Rapp Decl., ¶¶
20 17-18.) Questions asked and Watermaster’s responses are included as an Appendix to the 2022
21 SYRMU TM. (Rapp Decl., ¶ 19.) The final draft 2022 SYRMU TM was released on September
22 2, 2022. (Rapp Decl., ¶ 20.) As directed by the Watermaster Board, the 2022 SYRMU was
23 approved pending any non-substantive changes. (Rapp Decl., ¶ 20.) The final version of the 2022
24 SYRMU TM was released on October 6, 2022. (Rapp Decl., ¶ 20.)

25 **5. The Watermaster Board Approved the 2022 SYRMU Without Objection**

26 The proposed 2022 SYRMU was presented to the three Pool Committees on September 8,
27 2022 for their recommendation and advice. The Appropriative Pool Committee discussed the
28 matter and, after consideration in confidential session, requested that Watermaster allow thirty

1 more days to provide advice and assistance, without expressing any further questions or concerns.
2 (Kavounas Decl., ¶ 18.) The Overlying (Non-Agricultural) Pool Committee and the Overlying
3 (Agricultural) Pool Committee members engaged in discussion with Watermaster staff but did not
4 take action to offer any advice or assistance. (Kavounas Decl., ¶ 18.) Following the Pool
5 Committee meetings, Watermaster staff met with the Appropriative Pool leadership to discuss
6 and better understand its request for additional time and provided additional information to
7 answer questions in advance of the September 15, 2022 Advisory Committee meeting. (Kavounas
8 Decl., ¶ 19.)

9 The proposed 2022 SYRMU was presented to the Advisory Committee at its regular
10 meeting on September 15, 2022, where it recommended that the Watermaster Board approve and
11 direct staff to file the proposed methodology with the Court. (Kavounas Decl., ¶ 20.) The motion
12 was passed by a 65.344% majority volume vote; the dissenting parties expressed that their
13 opposition was due to a desire for 30 additional days to consider the item, without stating any
14 substantive concerns or expressing any questions about the final 2022 SYRMU. (Kavounas Decl.,
15 ¶ 21.)

16 At its regularly scheduled meeting on September 22, 2022, the Watermaster Board
17 approved the 2022 SYRMU unanimously and directed counsel to file this motion for Court
18 approval. (Kavounas Declaration, ¶ 22; Kavounas Declaration, Exh. E [September 22, 2022 Safe
19 Yield Reset Methodology Update Power Point]; Rapp Decl., Exh. C [2022 SYRMU TM].) At
20 the time of the Board's consideration of the 2022 SYRMU, no Party spoke to oppose the
21 Watermaster Board's approval. (Kavounas Decl., ¶ 23.)

22 **III. THE 2022 UPDATE TO WATERMASTER SYR METHODOLOGY**

23 The 2022 SYRMU updates the current SYR Methodology to incorporate best
24 management practices with the recommendation and advice of the parties, consistent with the
25 2017 Court Order. (Rapp Decl., ¶ 21.) As stated in the 2022 SYRMU TM, uncertainty analysis in
26 model calibration and model projection is an important part of surface-water and groundwater
27 modeling. (Rapp Decl., Exh. D, p. 5.) The present SYR Methodology involves developing a
28 single numerical groundwater model with limited uncertainty analysis. (Rapp Decl., Exh. D, p. 5.)

1 This approach has limited ability to predict the range of potential impacts and their likelihood of
2 occurring. (Rapp Decl., ¶ 23.) A quantitative uncertainty analysis provides a range of model
3 predictions that simulate both historical or future conditions with associated likelihoods and also
4 identifies the main sources of uncertainty and the extent to which the uncertainty in outcomes can
5 be reduced by incorporating additional data into the model. (Rapp Decl., ¶ 24.) An uncertainty
6 analysis has the benefit of identifying gaps in data that may inform future monitoring while also
7 improving the understanding of the sensitivity of modeled responses to future assumptions. (Rapp
8 Decl., ¶ 25.)

9 The 2022 SYRMU supplements the current Safe Yield Reset process to incorporate
10 consideration of the inherent uncertainty in the inputs of the groundwater-flow model and the
11 predictive uncertainty of future water demands, water supplies, and hydrology. (Rapp Decl., ¶
12 26.) To improve the consideration of uncertainty in the groundwater-flow model inputs, the 2022
13 SYRMU includes an uncertainty analysis during the model calibration process to identify a
14 plausible range of calibrated models. (Rapp Decl., ¶ 27.) The 2022 SYRMU provides that the
15 Safe Yield be reset based on the simulation results of an ensemble of multiple projection
16 scenarios, with each scenario comprising unique combinations of water demand, water supply
17 plans, and climate/hydrology. (Rapp Decl., ¶ 28.)

18 At a basic level, the proposed changes to the SYR Methodology facilitate the evaluation
19 of a wider range of conditions to produce a larger quantity of potential plausible futures. Such an
20 “ensemble” of potential futures provides a range of possible Safe Yields, informing the ultimate
21 selection of a new Safe Yield. The significant changes to the current SYR Methodology in the
22 2022 SYRMU are discussed in greater detail below.

23 **A. Incorporation of Demand and Supply Plans In Scenario Development**

24 The current methodology uses planning data collected from the parties and other sources
25 to develop a single projected scenario of future water supply plans and demands. (Rapp Decl., ¶
26 29.) With the current methodology there is minimal stakeholder engagement beyond clarifying
27 the collected data. (Rapp Decl., ¶ 29.) The 2022 SYRMU proposes to collect the same data sets as
28 in the current SYR Methodology, but to also incorporate Robust Decision Making (“RDM”)

1 principles to understand the drivers and stress responses to aid in the development of multiple
2 plausible projections for demand and supply plans. (Rapp Decl., ¶ 30.) In this RDM approach,
3 numerous model scenarios are run with various input datasets to determine the possible outcomes
4 against a wide range of plausible futures. (Rapp Decl., ¶ 30.)

5 The current deterministic approach of calculating the Safe Yield using a single calibrated
6 realization and projection scenario does not allow for an assessment of the uncertainties in model
7 projections. (Rapp Decl., ¶ 31.) Research conducted to inform development of the California
8 Department of Water Resources’ best management practices for the development of groundwater
9 models for complying with the Sustainable Groundwater Management Act identified RDM as a
10 useful approach for developing and interpreting models to inform management decisions.
11 Applying RDM principles to the calculation of the Safe Yield does not introduce additional
12 complexities or potential uncertainties that may be present in a dynamic planning framework.
13 (Rapp Decl., ¶ 32.)

14 **B. Changes in Projection Realization Development**

15 A “projection realization” is a unique combination of a calibrated realization and a
16 projection scenario. (Rapp Decl., ¶ 33.) The current methodology develops a single projection
17 scenario based on a combination of the best estimates of future demands, supply plans, and long-
18 term expected value hydrology adjusted for climate change. (Rapp Decl., ¶ 33.) The 2022
19 SYRMU proposes to develop multiple projection realizations as unique combinations of
20 calibrated model realizations, future demands and water supply plans, and future climate and
21 hydrology. (Rapp Decl., ¶ 33.)

22 **C. Changes in Evaluation of Model Results**

23 With the current methodology, the single projection realization is evaluated based on
24 whether projected groundwater pumping will cause or threaten to cause undesirable results or
25 Material Physical Injury (“MPI”). (Rapp Decl., ¶ 34.) With the proposed 2022 SYRMU, the
26 method to evaluate model results is like the current SYR Methodology in that it will evaluate
27 whether projected pumping with cause or threaten to cause MPI or undesirable results, but the
28 method is automated and applied to the ensemble of projection scenarios. (Rapp Decl., ¶ 35.)

1 Ensemble statistics are then generated to characterize the potential for MPI and state of hydraulic
2 control and identify the drivers that may cause MPI or loss of hydraulic control. (Rapp Decl., ¶
3 35.)

4 **D. Changes in Calculation of Safe Yield Based On Model Results**

5 With the current methodology, the Safe Yield is calculated as the 10-year average of net
6 recharge for a single model projection realization. (Rapp Decl., ¶ 36.) The 2022 SYRMU
7 proposes to calculate Safe Yield as the mean of the 10-year average net recharge for the ensemble
8 of projection scenarios, possibly weighted by assigned likelihood of water demand and supply
9 scenarios. (Rapp Decl., ¶ 36.)

10 **IV. THE COURT SHOULD APPROVE THE 2022 SYRMU**

11 All water is precious. California Constitution Article X, section 2 requires that water must
12 be put to beneficial use to the “fullest extent possible” as does the Judgment. In carrying out this
13 responsibility, Watermaster is also obliged to avoid or mitigate undesirable results. (2017 Order,
14 p. 17.) The Court and the parties to the Judgment have consistently sought an open, transparent
15 process in adjusting Safe Yield so that all may have confidence in the outcome and plan
16 accordingly.

17 The history of this process is significant and lengthy. Pursuant to this Court’s continuing
18 jurisdiction, reserved to it by Paragraph 15 of the Judgment in this action, upon application of any
19 party by a properly noticed motion and after hearing thereon, the Court may “. . .make such
20 further or supplemental orders or directions as may be necessary or appropriate for interpretation,
21 enforcement or carrying out of this Judgment, and to modify, amend or amplify any of the
22 provisions of the Judgment.” (Judgment, ¶ 15.)

23 The 2017 Order specifically provided for possible update and supplementation of the Safe
24 Yield reset methodology as the state of the science and technology evolve. (2017 Order, p. 16.)
25 As described above, the current SYR Methodology includes the development of a single
26 groundwater scenario, which has limited ability to predict the range of potential impacts and their
27 likelihood of occurring. (Rapp Decl., ¶ 23.) The 2022 SYRMU incorporates the consideration of
28 uncertainty by providing a range of scenarios that incorporates historical or future conditions, in

1 addition to identifying data gaps. (Rapp Decl., ¶ 37.) This update in the methodology will help to
2 provide a more accurate Safe Yield, incorporating the requested uncertainty analysis. (Rapp
3 Decl., ¶ 37.) The updated SYR Methodology complies with the 2017 Order and implements the
4 most current science and technology to more accurately evaluate the Safe Yield for the Basin.
5 (Rapp Decl., ¶ 38.)

6 The 2017 Order specifically provided for the inclusion of the Pool committees and
7 Advisory Committee in Watermaster’s process for updating the SYR Methodology. (2017 Order,
8 p. 16.) The updated methodology has undergone thorough review by Watermaster and interested
9 stakeholders. The Pool Committees were offered the opportunity to provide recommendations
10 and advice, and the Advisory Committee, by majority vote, supported moving the Court to
11 approve the 2022 SYRMU, with those voting against the recommendation not voicing any
12 concerns with the substance of the 2022 SYRMU. (Kavounas Decl., ¶¶ 18-22.) Therefore, there is
13 good cause to grant Watermaster’s Motion and approve the 2022 SRYMU.

14 Watermaster is not aware of any remaining dissent; no Party opposed the 2022 SYRMU
15 when the Watermaster Board approved its filing with the Court for approval. (Kavounas Decl., ¶
16 23.)

17 **V. CONCLUSION**

18 Watermaster’s prudent management of groundwater in the Basin and avoidance of harm,
19 preserving the resource for current use as well as future generations is dependent upon a
20 sophisticated model developed and improved over decades. In accordance with best practices and
21 prior Court orders, Watermaster updates the model in reasonable intervals. The reliability of the
22 estimates and the ensuing evaluations follows a specific Court approved methodology, and
23 consistent with best practices – it will now include an uncertainty analysis. Approving the 2022
24 SYRMU and adding it to the Chino Basin Watermaster SYR Methodology is technically prudent,
25 properly vetted and unopposed by any party as of this filing. It is also in the public interest and
26 therefore, for all these reasons, Watermaster requests the Court’s approval.

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Dated: November 15, 2022

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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 November 15, 2022, I served the following:

1. NOTICE OF MOTION AND MOTION FOR COURT APPROVAL OF UPDATE TO WATERMASTER SAFE YIELD RESET METHODOLOGY

/X/ BY MAIL: in said cause, by placing a true copy thereof enclosed with postage thereon fully prepaid, for delivery by the 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.

See attached service list: Master Email Distribution List

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

Executed on November 15, 2022 in Rancho Cucamonga, California.



By: Ruby Favela Quintero
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