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EXEMPT FROM FILING FEES
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SUPERIOR COURT OF THE STATE OF CALIFORNIA
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 GILBERT G. OCHOA]

**CITY OF ONTARIO'S EVIDENTIARY
OBJECTIONS TO DECLARATION OF
ELIZABETH HURST IN SUPPORT OF
INLAND EMPIRE UTILITIES
AGENCY'S SUPPLEMENTAL BRIEF
TO MOTION FOR COURT
APPROVAL OF CORRECTED AND
AMENDED FY 2021/22 AND 2022/23
ASSESSMENT PACKAGES**

Hearing:

Date: August 14, 2026

Time: 10:00 a.m.

Department: R17

1 City of Ontario (“Ontario”) respectfully submits the following evidentiary objections to the
2 Declaration of Elizabeth Hurst (“Declarant” or “Hurst Decl.”) in Support of Inland Empire Utilities
3 Agency’s (“IEUA”) Supplemental Brief to Motion for Court Approval of Corrected and Amended
4 FY 2021/2022 and 2022/2023 Assessment Packages, and the Exhibits referenced and attached to
5 said declaration. Pursuant to Code of Civil Procedure section 436 and in accordance with the
6 objections set forth herein, Ontario requests that the Court strike the Hurst Decl. in its entirety, or
7 in the alternative, strike the specific paragraphs referenced below and Exhibits 2, 3, 4, 5, 6, 7, 8, 9,
8 10, and 11.

9 **I. GENERAL OBJECTIONS TO DECLARATION OF ELIZABETH HURST**

10 Ontario respectfully submits this general objection to the Hurst Decl. in support of the
11 IEUA’s Supplemental Brief to Motion for Court Approval of Corrected and Amended
12 FY 2021/2022 and 2022/2023 Assessment Packages as irrelevant to the limited issue before the
13 Court whether Watermaster has complied with the Court of Appeal’s directive to correct and revise
14 the assessment packages consistent with the original DYY Program agreements, the Judgment, and
15 prior court orders. The supporting declaration largely focuses on issues irrelevant to that narrow
16 issue, including raising the rationale of Opposing Parties’ prior decisions to use DYY Program
17 water under the 2019 Letter Agreement, and the associated costs of doing so. None of these issues
18 are relevant to the limited issue before the court that the assessment packages be revised consistent
19 with the original DYY Program agreements. Nor do they provide justification or support for
20 Watermaster to treat the produced water at issue by Fontana and CVWD in the CAA Packages as
21 “DYY production” that is exempt from DRO assessments because that is not authorized by the
22 original DYY agreements and prior court orders. For example, the Opinion makes clear that
23 Fontana is not authorized to recover stored and supplemental water under the DYY Program as it
24 did not have a court approved local agency agreement. None of the above issues are relevant to or
25 change that result. Moreover, issues raised by the Opposing Parties concerning their purported
26 reliance on the 2019 Letter Agreement and financial impacts relating thereto also are not relevant
27 to changing the Opinion’s directive, and these issues were previously raised and disregarded by the
28 Court of Appeal.

Exhibits 2, 3, 4, 5, 6, 7, 8, 9, 10, and 11 are offered as evidence of Metropolitan Water District's ("MWD") storage of water in the Chino Basin and related costs and extractions under the DYY Program. Such evidence is not relevant for the aforementioned reasons.

II. SPECIFIC OBJECTIONS TO THE DECLARATION OF ELIZABETH HURST

DECLARATION OF ELIZABETH HURST IN SUPPORT OF INLAND EMPIRE UTILITIES AGENCY'S SUPPLEMENTAL BRIEF TO MOTION FOR COURT APPROVAL OF CORRECTED AND AMENDED FY2021/2022 AND 2022/2023 ASSESSMENT PACKAGES

Material Objected To	Grounds for Objection	Ruling
1. Declaration of Elizabeth Hurst, ¶3, page 2, lines 17-19: "Under the DYYP, MWD agreed to provide Chino Basin parties over \$27,000,000 to fund construction of groundwater treatment and well facilities in the region. In exchange for this funding, MWD received a right to store water for future use in the Chino Basin."	Irrelevant. Evid. Code §§ 210, 350. MWD's funding is irrelevant to Ontario's opposition to Watermaster's motion, the issues in the supplemental briefing, and Ontario's effort to enforce the Court Appeal's Opinion directing Watermaster to correct and amend the FY 2021/2022 and 2022/2023 Assessment Packages consistent with the original DYY Program agreements, the Judgment, and prior court orders. In its Opinion, the Court of Appeal found that Watermaster's interpretation and application of the 2019 Letter Agreement to approve the Assessment Packages "violated the Judgment and the agreements that created the DYY Program" and the 2019 Letter Agreement is not court approved or one of the original DYY Program agreements, and therefore, the produced water in the corrected assessment packages cannot be designated as DYY water. Lacks foundation and personal knowledge. Evid. Code §§ 403, 702(a) and 800. Declarant fails to lay proper foundation or establish personal knowledge of MWD's agreement.	Sustained: ____ Overruled: ____
2. Declaration of Elizabeth Hurst, ¶4, page 2, lines 17-19: "The DYYP as constructed, provides MWD the ability to	Irrelevant. Evid. Code §§ 210, 350. MWD's operations including its storage of water is irrelevant to Ontario's opposition to Watermaster's motion, the issues in the supplemental	Sustained: ____ Overruled: ____

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Material Objected To	Grounds for Objection	Ruling
remotely store water in an identified MWD storage account when MWD's supply is high (i.e. heavy rainfall years) and/or MWD's local reservoirs are full. This allows MWD to sell the stored water later, when operationally beneficial."	briefing, and Ontario's effort to enforce the Court Appeal's Opinion directing Watermaster to correct and amend the FY 2021/2022 and 2022/2023 Assessment Packages consistent with the original DYY Program agreements, the Judgment, and prior court orders. In its Opinion, the Court of Appeal found that Watermaster's interpretation and application of the 2019 Letter Agreement to approve the Assessment Packages "violated the Judgment and the agreements that created the DYY Program" and the 2019 Letter Agreement is not court approved or one of the original DYY Program agreements, and therefore, the produced water in the corrected assessment packages cannot be designated as DYY water. Lacks foundation and personal knowledge. Evid. Code §§ 403, 702(a) and 800. Declarant fails to lay proper foundation or establish personal knowledge of MWD's operations. Improper Opinion. Evid. Code §§ 800-804. Declarant's testimony consists of inadmissible opinions, including without limitation, regarding MWD's operations.	
3. Declaration of Elizabeth Hurst, ¶6, page 2, lines 17-19: "The DYYP established a five-member Operating Committee comprised of one member each of IEUA, TVMWD, and Watermaster and two MWD representatives. The Operating Committee meets as reasonably often as necessary to	Irrelevant. Evid. Code §§ 210, 350. The Operating Committee and DYYP operations are irrelevant to Ontario's opposition to Watermaster's motion, the issues in the supplemental briefing, and Ontario's effort to enforce the Court Appeal's Opinion directing Watermaster to correct and amend the FY 2021/2022 and 2022/2023 Assessment Packages consistent with the original DYY	Sustained: ____ Overruled: ____

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Material Objected To	Grounds for Objection	Ruling
implement DYYP operations and certifies an Annual Operating Plan and Annual Report summarizing DYYP activities in the previous year. The Annual Operating Plan provides an estimated schedule and location for all storage and extraction under the DYYP for each upcoming fiscal year."	Program agreements, the Judgment, and prior court orders. In its Opinion, the Court of Appeal found that Watermaster's interpretation and application of the 2019 Letter Agreement to approve the Assessment Packages "violated the Judgment and the agreements that created the DYY Program" and the 2019 Letter Agreement is not court approved or one of the original DYY Program agreements, and therefore, the produced water in the corrected assessment packages cannot be designated as DYY water. Lacks foundation and personal knowledge. Evid. Code §§ 403, 702(a) and 800. Declarant fails to lay proper foundation or establish personal knowledge of the Operating Committee's implementation of DYYP operations.	
4. Declaration of Elizabeth Hurst, ¶7, page 3, lines 4-7: "Under the DYYP and during years in which imported water delivery for storage is deemed operationally beneficial, MWD imports water into the Chino Basin region by directing State Water Project supply south, through MWD's Rialto Pipeline, for recharge into the Chino Basin in conformance with the year's Annual Operating Plan."	Irrelevant. Evid. Code §§ 210, 350. MWD's operations including its importation of water is irrelevant to Ontario's opposition to Watermaster's motion, the issues in the supplemental briefing, and Ontario's effort to enforce the Court Appeal's Opinion directing Watermaster to correct and amend the FY 2021/2022 and 2022/2023 Assessment Packages consistent with the original DYY Program agreements, the Judgment, and prior court orders. In its Opinion, the Court of Appeal found that Watermaster's interpretation and application of the 2019 Letter Agreement to approve the Assessment Packages "violated the Judgment and the agreements that created the DYY Program" and the 2019 Letter Agreement is not court approved or one of the original DYY Program agreements, and therefore, the	Sustained: ____ Overruled: ____

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Material Objected To	Grounds for Objection	Ruling
	produced water in the corrected assessment packages cannot be designated as DYY water. Lacks foundation and personal knowledge. Evid. Code §§ 403, 702(a) and 800. Declarant fails to lay proper foundation or establish personal knowledge of MWD's operations and the Annual Operating Plan. Improper Opinion. Evid. Code §§ 800–804. Declarant's testimony consists of inadmissible opinions, including without limitation, regarding MWD's operations and conformance with the Annual Operating Plan.	
5. Declaration of Elizabeth Hurst, ¶8, page 3, lines 8-17: "The imported water IEUA receives from MWD largely originates in the Northern Sierra Nevada mountain range and is conveyed to Southern California through the State Water Project. This water comes as runoff from the Feather River/Lake Oroville system, is conveyed across the Sacramento—San Joaquin Delta, pumped into the California Aqueduct, carried south over the Tehachapi Mountains, and routed onto the State Water Project's East Branch serving San Bernardino and Riverside Counties. From there, it moves through Lake Silverwood, out of Devil Canyon, and is delivered through MWD's Rialto Pipeline to IEUA and the Chino Basin area. As a member agency of	Irrelevant. Evid. Code §§ 210, 350. MWD's operations and location of imported water is irrelevant to Ontario's opposition to Watermaster's motion, the issues in the supplemental briefing, and Ontario's effort to enforce the Court Appeal's Opinion directing Watermaster to correct and amend the FY 2021/2022 and 2022/2023 Assessment Packages consistent with the original DYY Program agreements, the Judgment, and prior court orders. In its Opinion, the Court of Appeal found that Watermaster's interpretation and application of the 2019 Letter Agreement to approve the Assessment Packages "violated the Judgment and the agreements that created the DYY Program" and the 2019 Letter Agreement is not court approved or one of the original DYY Program agreements, and therefore, the produced water in the corrected assessment packages cannot be designated as DYY water.	Sustained: ____ Overruled: ____

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MWD, IEUA only receives imported water from the State Water Project, and recharges this imported water into Chino Basin through various recharge basin sites. A graphic depiction of the path this water travels to reach the Chino Basin, represented by the circled portion, is included below."	Lacks foundation and personal knowledge. Evid. Code §§ 403, 702(a) and 800. Declarant fails to lay proper foundation or establish personal knowledge of MWD's operations and importation of water.	
6. Declaration of Elizabeth Hurst, ¶9, page 4, lines 1-4: "Based on my experience with the DYYP and Operating Committee, MWD will initiate the process of delivering imported water into the Chino Basin by issuing a request to the Operating Committee. The Operating Committee will then confer to finalize and approve the Annual Operating Plan for the upcoming fiscal year."	Irrelevant. Evid. Code §§ 210, 350. MWD's operations including the importation of water into the basin is irrelevant to Ontario's opposition to Watermaster's motion, the issues in the supplemental briefing, and Ontario's effort to enforce the Court Appeal's Opinion directing Watermaster to correct and amend the FY 2021/2022 and 2022/2023 Assessment Packages consistent with the original DYY Program agreements, the Judgment, and prior court orders. In its Opinion, the Court of Appeal found that Watermaster's interpretation and application of the 2019 Letter Agreement to approve the Assessment Packages "violated the Judgment and the agreements that created the DYY Program" and the 2019 Letter Agreement is not court approved or one of the original DYY Program agreements, and therefore, the produced water in the corrected assessment packages cannot be designated as DYY water.	Sustained: ____ Overruled: ____
7. Declaration of Elizabeth Hurst, ¶10, page 4, lines 5-9: "After the Operating Committee approves the Annual Operating Plan, MWD will then physically direct water through its facilities to the Rialto Pipeline. The Rialto Pipeline ties into the Chino Basin region and has many identified	Irrelevant. Evid. Code §§ 210, 350. MWD's operations including importation of water into the basin is irrelevant to Ontario's opposition to Watermaster's motion, the issues in the supplemental briefing, and Ontario's effort to enforce the Court Appeal's Opinion directing Watermaster to correct and amend the FY 2021/2022 and 2022/2023	Sustained: ____ Overruled: ____

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Material Objected To	Grounds for Objection	Ruling
turnouts. IEUA coordinates opening/closing of these turnouts to direct the imported water to spreading basins or injection wells where the imported water will infiltrate into the Chino Basin for storage in MWD's DYYP account."	Assessment Packages consistent with the original DYY Program agreements, the Judgment, and prior court orders. In its Opinion, the Court of Appeal found that Watermaster's interpretation and application of the 2019 Letter Agreement to approve the Assessment Packages "violated the Judgment and the agreements that created the DYY Program" and the 2019 Letter Agreement is not court approved or one of the original DYY Program agreements, and therefore, the produced water in the corrected assessment packages cannot be designated as DYY water. Lacks foundation and personal knowledge. Evid. Code §§ 403, 702(a) and 800. Declarant fails to lay proper foundation or establish personal knowledge of MWD's operations. Improper Opinion. Evid. Code §§ 800-804. Declarant's testimony consists of inadmissible opinions, including without limitation, regarding MWD's operations.	
8. Declaration of Elizabeth Hurst, ¶11, page 4, lines 10-11: "MWD water sent to the Chino Basin as part of the DYYP is uniquely tracked and accounted for by the DYYP parties through a series of certifications, invoices, and reports."	Irrelevant. Evid. Code §§ 210, 350. MWD's delivery of water to the basin as part of the DYYP is irrelevant to Ontario's opposition to Watermaster's motion, the issues in the supplemental briefing, and Ontario's effort to enforce the Court Appeal's Opinion directing Watermaster to correct and amend the FY 2021/2022 and 2022/2023 Assessment Packages consistent with the original DYY Program agreements, the Judgment, and prior court orders. In its Opinion, the Court of Appeal found that Watermaster's interpretation and application of the 2019 Letter	Sustained: ____ Overruled: ____

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Material Objected To	Grounds for Objection	Ruling
	Agreement to approve the Assessment Packages "violated the Judgment and the agreements that created the DYY Program" and the 2019 Letter Agreement is not court approved or one of the original DYY Program agreements, and therefore, the produced water in the corrected assessment packages cannot be designated as DYY water. Lacks foundation and personal knowledge; speculative. Evid. Code §§ 403, 702(a) and 800. Declarant fails to lay proper foundation or establish personal knowledge of the accounting of stored water by the DYYP parties and it is speculative. Improper Opinion. Evid. Code §§ 800-804. Declarant's testimony consists of inadmissible opinions, including without limitation, regarding the accounting of stored water by the DYYP parties.	
9. Declaration of Elizabeth Hurst, ¶12, page 4, lines 12-15: "On June 1, 2017, I received and reviewed a letter from MWD requesting to store additional water in MWD's DYYP storage account. In this letter, MWD cited recent hydrologic conditions having led to MWD holding surplus water which would be better stored for later sale. A true and correct copy of MWD's June 1, 2017 request is attached hereto as "Exhibit 2"."	Irrelevant. Evid. Code §§ 210, 350. The June 1, 2017 letter is irrelevant to Ontario's opposition to Watermaster's motion, the issues in the supplemental briefing, and Ontario's effort to enforce the Court Appeal's Opinion directing Watermaster to correct and amend the FY 2021/2022 and 2022/2023 Assessment Packages consistent with the original DYY Program agreements, the Judgment, and prior court orders. In its Opinion, the Court of Appeal found that Watermaster's interpretation and application of the 2019 Letter Agreement to approve the Assessment Packages "violated the Judgment and the agreements that created the DYY Program" and the 2019 Letter	Sustained: ____ Overruled: ____

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Material Objected To	Grounds for Objection	Ruling
	Agreement is not court approved or one of the original DYY Program agreements, and therefore, the produced water in the corrected assessment packages cannot be designated as DYY water. Hearsay. Evid. Code § 1200. Declarant's testimony regarding the June 1, 2017 letter is based on inadmissible hearsay.	
10. Declaration of Elizabeth Hurst, ¶13, page 4, lines 16-18: "On June 5, 2017, IEUA prepared and submitted to MWD a DYYP recharge plan detailing the schedule and flow paths for imported water recharge responsive to MWD's June 1 request. A true and correct copy of the 2017 DYYP recharge plan is attached hereto as "Exhibit 3"."	Irrelevant. Evid. Code §§ 210, 350. The June 5, 2017 letter is irrelevant to Ontario's opposition to Watermaster's motion, the issues in the supplemental briefing, and Ontario's effort to enforce the Court Appeal's Opinion directing Watermaster to correct and amend the FY 2021/2022 and 2022/2023 Assessment Packages consistent with the original DYY Program agreements, the Judgment, and prior court orders. In its Opinion, the Court of Appeal found that Watermaster's interpretation and application of the 2019 Letter Agreement to approve the Assessment Packages "violated the Judgment and the agreements that created the DYY Program" and the 2019 Letter Agreement is not court approved or one of the original DYY Program agreements, and therefore, the produced water in the corrected assessment packages cannot be designated as DYY water. Lacks foundation and personal knowledge. Evid. Code §§ 403, 702(a) and 800. Declarant fails to lay proper foundation or establish personal knowledge of the June 5, 2017 letter and contents therein.	Sustained: ____ Overruled: ____

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Material Objected To	Grounds for Objection	Ruling
	Hearsay. Evid. Code § 1200. Declarant's testimony regarding the June 5, 2017 letter is based on inadmissible hearsay.	
11. Declaration of Elizabeth Hurst, ¶14, page 4, line 19 to page 5, line 3: "Included with the June 5, 2017 recharge plan was a map of the Chino Basin service area, specifically depicting the planned path of the imported water to be recharged into the Chino Basin under the DYYP. The map depicts imported water sent from MWD's facilities through the Rialto pipeline and lists a number of identified turnouts, specifically, OC59, CB20, CB11, CB15, CB14, and CB13. The turnouts are represented by yellow dots on the map. Once the imported water reaches the designated turnout, it is diverted south toward spreading basins for recharge. This flow path is shown as light red arrows on the map. The map also identifies the recharge basins by name (i.e. College Heights in the Northwest portion, San Sevaïne No. 1-5 in the Northeast portion). Once it reaches the spreading basins, the imported water will fill the basin and gradually infiltrate into the ground, reaching the Chino Basin aquifer. The amount of imported water delivered and recharged is tracked throughout the process by meters at each facility. A true and correct copy of the map of Chino Basin/MWD recharge turnouts and	Irrelevant. Evid. Code §§ 210, 350. MWD's delivery of water to the basin as part of the DYYP is irrelevant to Ontario's opposition to Watermaster's motion, the issues in the supplemental briefing, and Ontario's effort to enforce the Court Appeal's Opinion directing Watermaster to correct and amend the FY 2021/2022 and 2022/2023 Assessment Packages consistent with the original DYY Program agreements, the Judgment, and prior court orders. In its Opinion, the Court of Appeal found that Watermaster's interpretation and application of the 2019 Letter Agreement to approve the Assessment Packages "violated the Judgment and the agreements that created the DYY Program" and the 2019 Letter Agreement is not court approved or one of the original DYY Program agreements, and therefore, the produced water in the corrected assessment packages cannot be designated as DYY water. Lacks foundation and personal knowledge; speculative. Evid. Code §§ 403, 702(a) and 800. Declarant fails to lay proper foundation or establish personal knowledge of the flow path of the imported water. Improper Opinion. Evid. Code §§ 800-804. Declarant's testimony consists of inadmissible opinions, including without limitation, regarding the flow path of the imported water.	Sustained: ____ Overruled: ____

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Material Objected To	Grounds for Objection	Ruling
flow paths to recharge sites is attached hereto as "Exhibit 4".		
12. Declaration of Elizabeth Hurst, ¶15, page 5, lines 4-10: “Under the DYYP, imported water recharged into the MWD storage is tracked on a monthly basis and subsequently certified by the member agency responsible for the recharge activity. For example, in response to MWD's June 1, 2017 request to store water, IEUA coordinated delivery and recharge of 7,345.9 acre feet of imported water into MWD's storage account in the Chino Basin for the month of July, 2017. Accordingly, IEUA certified this amount to MWD with a specific breakdown of the amount of imported water recharged at each specified service connection for the month. A true and correct copy of the executed DYYP recharge certification for the month of July, 2017 is attached hereto as "Exhibit 5".”	Irrelevant. Evid. Code §§ 210, 350. MWD's delivery of water to the basin as part of the DYYP including in 2017 is irrelevant to Ontario's opposition to Watermaster's motion, the issues in the supplemental briefing, and Ontario's effort to enforce the Court Appeal's Opinion directing Watermaster to correct and amend the FY 2021/2022 and 2022/2023 Assessment Packages consistent with the original DYY Program agreements, the Judgment, and prior court orders. In its Opinion, the Court of Appeal found that Watermaster's interpretation and application of the 2019 Letter Agreement to approve the Assessment Packages “violated the Judgment and the agreements that created the DYY Program” and the 2019 Letter Agreement is not court approved or one of the original DYY Program agreements, and therefore, the produced water in the corrected assessment packages cannot be designated as DYY water. Lacks foundation and personal knowledge; speculative. Evid. Code §§ 403, 702(a) and 800. Declarant fails to lay proper foundation or establish personal knowledge of the recharge of imported water and it is speculative. Improper Opinion. Evid. Code §§ 800–804. Declarant's testimony consists of inadmissible opinions, including without limitation, regarding the recharge of imported water.	Sustained: ____ Overruled: ____

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Material Objected To	Grounds for Objection	Ruling
13. Declaration of Elizabeth Hurst, ¶16, page 5, lines 11-22: “Pursuant to standard operating procedure, MWD submits monthly invoices for imported water sales to IEUA. These monthly invoices reflect the amount of imported water deliveries received from MWD at each metered turnout location. The amount of water delivered is then multiplied by the applicable MWD rate to determine the amount billed for that month. A true and correct copy of MWD's July, 2017 invoice to IEUA for imported water deliveries is attached hereto as "Exhibit 6". This invoice specifically identifies the imported water deliveries under the DYYP, certified by IEUA and removes the applicable charge for the water until it is compelled to be purchased as part of a Call to perform. For example, during July, 2017, 219.9 acre feet of untreated MWD water was delivered to meter CB11 in Rancho Cucamonga at the applicable MWD rate of \$666.00 per acre-foot. This would typically incur a charge of \$146,453.40 (219.9 x \$666.00) for those deliveries, but Exhibit 6 adjusts the amount due to \$0 as said deliveries are part of the DYYP and were recharged directly into the MWD storage account.”	Irrelevant. Evid. Code §§ 210, 350. MWD's delivery of water to the basin as part of the DYYP and charges for such water is irrelevant to Ontario's opposition to Watermaster's motion, the issues in the supplemental briefing, and Ontario's effort to enforce the Court Appeal's Opinion directing Watermaster to correct and amend the FY 2021/2022 and 2022/2023 Assessment Packages consistent with the original DYY Program agreements, the Judgment, and prior court orders. In its Opinion, the Court of Appeal found that Watermaster's interpretation and application of the 2019 Letter Agreement to approve the Assessment Packages “violated the Judgment and the agreements that created the DYY Program” and the 2019 Letter Agreement is not court approved or one of the original DYY Program agreements, and therefore, the produced water in the corrected assessment packages cannot be designated as DYY water. Lacks foundation and personal knowledge; speculative. Evid. Code §§ 403, 702(a) and 800. Declarant fails to lay proper foundation or establish personal knowledge of MWD's standard operating procedures and accounting of stored water. Improper Opinion. Evid. Code §§ 800–804. Declarant's testimony consists of inadmissible opinions, including without limitation, regarding the MWD's standard operating procedures and accounting of stored water.	Sustained: ____ Overruled: ____

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Material Objected To	Grounds for Objection	Ruling
14. Declaration of Elizabeth Hurst, ¶17, page 5, lines 23-28: “Under the DYYP, deliveries of imported water to MWD's storage account are tracked by each member of the Operating Committee throughout the fiscal year. That data is then compiled and incorporated into the Operating Committee's Annual Report. Each Annual Report reflects the prior recharge and/or extraction activity attributable to the MWD account for the prior fiscal year. The Annual Report also sets forth planned activity for the coming year, to be discussed and approved by the Operating Committee. A true and correct copy of the 2017-2018 Annual Report is attached hereto as "Exhibit 7".”	Irrelevant. Evid. Code §§ 210, 350. MWD's delivery of water to the basin as part of the DYYP and accounting of deliveries is irrelevant to Ontario's opposition to Watermaster's motion, the issues in the supplemental briefing, and Ontario's effort to enforce the Court Appeal's Opinion directing Watermaster to correct and amend the FY 2021/2022 and 2022/2023 Assessment Packages consistent with the original DYY Program agreements, the Judgment, and prior court orders. In its Opinion, the Court of Appeal found that Watermaster's interpretation and application of the 2019 Letter Agreement to approve the Assessment Packages “violated the Judgment and the agreements that created the DYY Program” and the 2019 Letter Agreement is not court approved or one of the original DYY Program agreements, and therefore, the produced water in the corrected assessment packages cannot be designated as DYY water. Lacks foundation and personal knowledge. Evid. Code §§ 403, 702(a) and 800. Declarant fails to lay proper foundation or establish personal knowledge of the accounting of stored water including by each member of the Operating Committee. Improper Opinion. Evid. Code §§ 800–804. Declarant's testimony consists of inadmissible opinions, including without limitation, regarding the accounting of stored water.	Sustained: ____ Overruled: ____

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Material Objected To	Grounds for Objection	Ruling
	Hearsay. Evid. Code § 1200. Declarant's testimony regarding the Annual Report is based on inadmissible hearsay.	
15. Declaration of Elizabeth Hurst, ¶18, page 6, lines 1-9: "In response to MWD's June 1, 2017 request, approximately 35,065 acre-feet of imported water from MWD's allocation in the State Water Project was recharged into the DYYP storage account over the following year, bringing the total amount held in MWD's account to 41,380 acre-feet. Absent MWD's request under the DYYP, this water would not have been introduced into the Chino Basin. This large increase in stored water in the DYYP account resulted in the Operating Committee exploring the potential for allowing voluntary withdrawal from the DYYP account to make full and efficient use of the water stored in the DYYP account on a voluntary basis, without MWD issuing a compulsory Call. The voluntary withdrawal option afforded participating agencies added flexibility to meet DYYP performance obligations while satisfying MWD's goal to reduce imported water demand."	Irrelevant. Evid. Code §§ 210, 350. The reasons for the 2019 Letter Agreement is irrelevant to Ontario's opposition to Watermaster's motion, the issues in the supplemental briefing, and Ontario's effort to enforce the Court Appeal's Opinion directing Watermaster to correct and amend the FY 2021/2022 and 2022/2023 Assessment Packages consistent with the original DYY Program agreements, the Judgment, and prior court orders. In its Opinion, the Court of Appeal found that Watermaster's interpretation and application of the 2019 Letter Agreement to approve the Assessment Packages "violated the Judgment and the agreements that created the DYY Program" and the 2019 Letter Agreement is not court approved or one of the original DYY Program agreements, and therefore, the produced water in the corrected assessment packages cannot be designated as DYY water. Lacks foundation and personal knowledge. Evid. Code §§ 403, 702(a) and 800. Declarant fails to lay proper foundation or establish personal knowledge of how the 2019 Letter Agreement impacted "participating agencies" and MWD goals. Improper Opinion. Evid. Code §§ 800-804. Declarant's testimony consists of inadmissible opinions, including without limitation, regarding how the	Sustained: ____ Overruled: ____

**DECLARATION OF ELIZABETH HURST IN SUPPORT OF INLAND
EMPIRE UTILITIES AGENCY'S SUPPLEMENTAL BRIEF TO MOTION FOR
COURT APPROVAL OF CORRECTED AND AMENDED FY2021/2022 AND
2022/2023 ASSESSMENT PACKAGES**

Material Objected To	Grounds for Objection	Ruling
	2019 Letter Agreement impacted "participating agencies" and MWD goals.	
16. Declaration of Elizabeth Hurst, ¶20, page 6, lines 20-25: "Pursuant to the DYYP and the 2019 letter agreement, I, on behalf of IEUA and the Operating Committee, contacted each participating agency prior to the beginning of each fiscal year to offer the opportunity to extract water from the MWD storage account voluntarily. Upon receiving a response and extraction plan from the interested agencies, this information would be incorporated into the updated Annual Operating Plan for the coming year. A true and correct copy of a 2021 email from me to all participating DYYP agencies communicating this offer is attached hereto as "Exhibit 9".	Irrelevant. Evid. Code §§ 210, 350. The 2019 Letter Agreement and 2021 email are irrelevant to Ontario's opposition to Watermaster's motion, the issues in the supplemental briefing, and Ontario's effort to enforce the Court Appeal's Opinion directing Watermaster to correct and amend the FY 2021/2022 and 2022/2023 Assessment Packages consistent with the original DYY Program agreements, the Judgment, and prior court orders. In its Opinion, the Court of Appeal found that Watermaster's interpretation and application of the 2019 Letter Agreement to approve the Assessment Packages "violated the Judgment and the agreements that created the DYY Program" and the 2019 Letter Agreement is not court approved or one of the original DYY Program agreements, and therefore, the produced water in the corrected assessment packages cannot be designated as DYY water.	Sustained: ____ Overruled: ____
17. Declaration of Elizabeth Hurst, ¶22, page 7, lines 2-7: "The voluntary extraction of stored imported water by CVWD and FWC from the MWD storage account was tracked through an identical series of certifications, invoices, and reports as deliveries to the MWD account for storage. For example, in May, 2021, CVWD certified voluntary DYYP extraction of 2,600 acre-feet of water from MWD's storage account and submitted the certification to IEUA. IEUA then submitted the	Irrelevant. Evid. Code §§ 210, 350. The certification and tracking of the water produced by CVWD and FWC is irrelevant to Ontario's opposition to Watermaster's motion, the issues in the supplemental briefing, and Ontario's effort to enforce the Court Appeal's Opinion directing Watermaster to correct and amend the FY 2021/2022 and 2022/2023 Assessment Packages consistent with the original DYY Program agreements, the Judgment, and prior court orders. In its Opinion, the Court of Appeal found that Watermaster's interpretation and application of the 2019 Letter Agreement to approve the	Sustained: ____ Overruled: ____

**DECLARATION OF ELIZABETH HURST IN SUPPORT OF INLAND
EMPIRE UTILITIES AGENCY'S SUPPLEMENTAL BRIEF TO MOTION FOR
COURT APPROVAL OF CORRECTED AND AMENDED FY2021/2022 AND
2022/2023 ASSESSMENT PACKAGES**

Material Objected To	Grounds for Objection	Ruling
certification to MWD for billing and tracking purposes. A true and correct copy of the May, 2021 DYYP activity certification is attached hereto as "Exhibit 10".	Assessment Packages "violated the Judgment and the agreements that created the DYY Program" and the 2019 Letter Agreement is not court approved or one of the original DYY Program agreements, and therefore, the produced water in the corrected assessment packages cannot be designated as DYY water.	
18. Declaration of Elizabeth Hurst, ¶23, page 7, lines 8-15: "MWD's May, 2021 invoice to IEUA referenced the voluntary DYYP extractions of MWD's stored imported water by CVWD for that month. The MWD invoice for May, 2021 identifies certain imported water purchases as related to the DYYP and provides a corresponding operations and maintenance credit of \$374.00 per acre-foot in accord with the DYYP. The adjust on the May, 2021 MWD invoice also specifies the prior delivery of this imported water to the Chino Basin in 2017/2018 for storage in the MWD DYYP account. This purchase of stored DYYP water is treated as an imported water purchase. A true and correct copy of MWD's May, 2021 invoice to IEUA is attached hereto as "Exhibit 11".	Irrelevant. Evid. Code §§ 210, 350. The certification and tracking of the water produced by CVWD and FWC is irrelevant to Ontario's opposition to Watermaster's motion, the issues in the supplemental briefing, and Ontario's effort to enforce the Court Appeal's Opinion directing Watermaster to correct and amend the FY 2021/2022 and 2022/2023 Assessment Packages consistent with the original DYY Program agreements, the Judgment, and prior court orders. In its Opinion, the Court of Appeal found that Watermaster's interpretation and application of the 2019 Letter Agreement to approve the Assessment Packages "violated the Judgment and the agreements that created the DYY Program" and the 2019 Letter Agreement is not court approved or one of the original DYY Program agreements, and therefore, the produced water in the corrected assessment packages cannot be designated as DYY water. Lacks foundation and personal knowledge. Evid. Code §§ 403, 702(a) and 800. Declarant fails to lay proper foundation or establish personal knowledge of MWD's treatment of the DYYP water.	Sustained: ____ Overruled: ____

**DECLARATION OF ELIZABETH HURST IN SUPPORT OF INLAND
EMPIRE UTILITIES AGENCY'S SUPPLEMENTAL BRIEF TO MOTION FOR
COURT APPROVAL OF CORRECTED AND AMENDED FY2021/2022 AND
2022/2023 ASSESSMENT PACKAGES**

Material Objected To	Grounds for Objection	Ruling
	Improper Opinion. Evid. Code §§ 800–804. Declarant's testimony consists of inadmissible opinions, including without limitation, regarding MWD's accounting practices. Hearsay. Evid. Code § 1200. Declarant's testimony regarding MWD's invoices and accounting practices is based on inadmissible hearsay.	
19. Declaration of Elizabeth Hurst, ¶24, page 7, lines 18-17: "All of the water voluntarily withdrawn by CVWD and FWC under the DYYP and 2019 letter agreement was stored imported water previously delivered to the Chino Basin at MWD's direction."	Irrelevant. Evid. Code §§ 210, 350. The contention that the water is withdrawn under the 2019 Letter Agreement is irrelevant to Ontario's opposition to Watermaster's motion, the issues in the supplemental briefing, and Ontario's effort to enforce the Court Appeal's Opinion directing Watermaster to correct and amend the FY 2021/2022 and 2022/2023 Assessment Packages consistent with the original DYY Program agreements, the Judgment, and prior court orders. In its Opinion, the Court of Appeal found that Watermaster's interpretation and application of the 2019 Letter Agreement to approve the Assessment Packages "violated the Judgment and the agreements that created the DYY Program" and the 2019 Letter Agreement is not court approved or one of the original DYY Program agreements, and therefore, the produced water in the corrected assessment packages cannot be designated as DYY water. Lacks foundation and personal knowledge; speculative. Evid. Code §§ 403, 702(a) and 800. Declarant fails to lay proper foundation or establish personal	Sustained: ____ Overruled: ____

1 **DECLARATION OF ELIZABETH HURST IN SUPPORT OF INLAND**
2 **EMPIRE UTILITIES AGENCY'S SUPPLEMENTAL BRIEF TO MOTION FOR**
3 **COURT APPROVAL OF CORRECTED AND AMENDED FY2021/2022 AND**
4 **2022/2023 ASSESSMENT PACKAGES**

5 Material Objected To	6 Grounds for Objection	7 Ruling
8	9 10 knowledge that the actual withdrawn 11 water was stored imported water 12 previously delivered at MWD's 13 direction. Such testimony is also 14 speculative. 15 16 Improper Opinion. Evid. Code 17 §§ 800-804. 18 19 Declarant's testimony consists of 20 inadmissible opinions, including 21 without limitation, that the actual 22 withdrawn water was stored imported 23 water previously delivered at MWD's 24 direction.	

25 Dated: August 3, 2026

26 STOEL RIVES LLP

27 By: 
28 ELIZABETH P. EWENS
 MICHAEL B. BROWN

 Attorneys for
 City of Ontario

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 action within. My business address is Chino Basin Watermaster, 9641 San Bernardino Road, Rancho Cucamonga, California 91730; telephone (909) 484-3888.

On August 3, 2026, I served the following:

1. CITY OF ONTARIO'S EVIDENTIARY OBJECTIONS TO DECLARATION OF ELIZABETH HURST IN SUPPORT OF INLAND EMPIRE UTILITIES AGENCY'S SUPPLEMENTAL BRIEF TO MOTION FOR COURT APPROVAL OF CORRECTED AND AMENDED FY 2021/22 AND 2022/23 ASSESSMENT PACKAGES

/ 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 August 3, 2026, in Rancho Cucamonga, California.



By: Kirk Richard C. Dolar
Chino Basin Watermaster

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