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7	CUMERIOR COURT OF THE	
8	SUPERIOR COURT OF THE STATE OF CALIFORNIA	
9	FOR THE COUNTY	OF RIVERSIDE
10	Coordination Proceeding Special Title (Cal. Rules of Court, rule 3.550)	JCCP NO.: 5265 Lead Case No. CIV 208568
11 12	MOJAVE BASIN AREA WATER CASES	Assigned for All Purposes to the Honorable Harold W. Hopp, Dept. 1
13		Honorable Craig G. Reimer, Judge
14		Presiding by assignment of the Chief Justice
15	CITY OF DARGTOW 4.1	GOLDEN STATE WATER
16	CITY OF BARSTOW, et al.,	COMPANY'S NOTICE OF MOTION AND MOTION TO ENFORCE
17	Plaintiff,	JUDGMENT; MEMORANDUM OF POINTS AND AUTHORITIES
18	V.	[Filed concurrently with Declarations of
19	CITY OF ADELANTO, et al.,	Toby Moore, Anthony Brown, and Stephanie Osler Hastings; Evidence in
20	Defendant.	Support of Motion to Enforce Judgment; Proposed Order]
21		Date: October 2, 2024 Time: 8:30 am
22		Dept.: 1 Judge: Hon. Craig G. Reimer
23		Reservation ID: 562595011427
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TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Please take notice that on October 2, 2024 at 8:30 a.m., or as soon thereafter as counsel may be heard, in Department 1 of the above entitled court located at 4050 Main Street, Riverside, California, before the Honorable Craig G. Reimer, GOLDEN STATE WATER COMPANY ("GSWC") will move this Court for an order to enforce the Judgment as more particularly described in the Proposed Order filed concurrently herewith.

This Motion is based upon this Notice and the attached Memorandum of Points and Authorities, the Declarations of Toby Moore, Anthony Brown, and Stephanie Osler Hastings, GSWC's Evidence in Support of this Motion, and the Proposed Order filed concurrently herewith, all documents on file herein, and such other evidence and argument that may be submitted at the hearing of this matter.

Dated: September 5, 2024	BROWNSTEIN HYATT FA	RBER
-	SCHDECK IID	0

By: MACKENZIE W. CARLSON Attorneys for Plaintiff

GOLDĚN STATE WATER COMPANY

BROWNSTEIN HYATT FARBER SCHRECK, LLP 1021 Anacapa Street, 2nd Floor Santa Barbara, CA 93101-2711

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MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION

GSWC brings this Motion to Enforce Judgment ("Motion") to require that the Mojave Basin Area Watermaster ("Watermaster")¹ to re-evaluate the Watermaster Engineer's recent update of the Production Safe Yield ("PSY")² for the Alto Subarea, including the Transition Zone, and Centro Subarea because it is not based on the best available data and information and in the absence of such data and information does not employ sound science and engineering techniques and therefore likely does not accurately calculate PSY for the purposes of implementing the Judgment, including setting the Free Production Allowances ("FPA") and ensuring each subarea satisfies its Subarea Obligation. Declining water levels in the Centro Subarea call into question whether Watermaster's water budget calculations for the Alto Subarea, Transition Zone and Centro Subarea are accurate and satisfy Watermaster's obligation in the Judgment.

GSWC, formerly the Southern California Water Company and one of the original Plaintiffs in this case, brings this Motion following extensive coordination with the Watermaster over the past five years with respect to Watermaster's calculation of PSY for each Subarea. Despite implementation of the Judgment's Physical Solution, water levels in the Centro Subarea have experienced chronic decline—increasing the water supply and treatment costs for GSWC's customers. The Judgment's Physical Solution sought to mitigate and address this very issue, but it has not. Further, the Judgment intended that the Watermaster would develop a better understanding of the Basin hydrology over time to ensure effective management. Based on GSWC's independent technical analysis, GSWC alleges that Watermaster's failure to use the best available data and employ sound hydrologic and engineering techniques in its calculation of PSY—instead continuing to rely on historical and outdated estimates, assumptions, and techniques—has resulted in inaccuracies and uncertainties in the PSY calculation, potentially adversely impacting inflows into the Centro Subarea.

¹ Mojave Water Agency ("MWA") serves as the Watermaster in this action.

² All defined terms have the same meaning as set forth in the Judgment. All capitalized terms, not otherwise defined, are the same as the terms used in the Judgment.

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Pursuant to Section 19 of the Judgment, this Motion requests that the Court enforce the Judgment and order Watermaster to re-evaluate its PSY calculations, hydrologic data, and underlying assumptions, and undertake the more rigorous technical analysis that is recommended by GSWC's independent technical analysis and is mandated by the Judgment. It further requests that Watermaster be ordered to prepare recommendations and a timeline to improve hydrologic data collection and scientific and engineering estimates to continuously improve implementation of the Judgment consistent with Watermaster's obligations and the Court's continuing jurisdiction.

II. **BACKGROUND**

Procedural Background

On September 16, 2022, the Court tasked the Watermaster with updating the PSY for all Subareas of the Basin Area under the Judgment After Trial in City of Barstow, et al., vs. City of Adelanto, et al. entered on January 10, 2996 ("Judgment"). (Declaration of Stephanie Hastings ("Hastings Decl."), ¶ 5; GSWC Evidence, 3 Exh. 2 [Court Order].) Responding to the Court's September 16, 2022 Order, on February 28, 2024, the Watermaster Engineer made available to the public its Production Safe Yield & Consumptive Use Update, dated February 28, 2024 ("2024 PSY Update"), which includes updated PSY for each of the Subareas within the Mojave Basin Area. (Hastings Decl., ¶ 6; GSWC Evidence, Exh. 4 [2024 PSY Update].)

During the period January to March, 2024, GSWC made numerous efforts to notify Watermaster of its concerns with the Watermaster Engineer's updated PSY, including meeting with Watermaster staff and Engineer, submitting written comments to the Watermaster, and making public comments at Watermaster meetings. (Declaration of Toby Moore ("Moore Decl."), ¶¶ 20– 21; Hastings Decl., ¶ 7; GSWC Evidence, Exhs. 13 & 14 [GSWC comment letters]). Notwithstanding GSWC's concerns, on March 27, 2024, Watermaster's Board of Directors accepted the 2024 PSY Update and adopted the 2024-25 FPA recommendation based on the updated PSY calculations included in the 2024 PSY Update. (Hastings Decl., ¶ 7.)

Thereafter, Watermaster filed its Thirtieth Annual Report of the Mojave Basin Area

³ Golden State Water Company Evidence in Support of Motion to Enforce Judgment is referred to as "GSWC Evidence" herein.

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Watermaster, Water Year 2022–2023 ("30th Annual Report") and a Motion to Adjust the Free Production Allowance for Water Year 2024–2025 along with a supporting Declaration of Robert C. Wagner, the Watermaster Engineer, that included the 2024 PSY Update. (Hastings Decl., ¶ 8.) On May 31, 2024, GSWC filed its Opposition to Mojave Water Agency's Motion Adjust Free Production Allowance for Water Year 2024-2025 on the grounds that Watermaster's 2024 PSY Update for the Alto Subarea, including the Transition Zone, and the Centro Subarea is not based on the best available science and therefore may not accurately estimate the quantity of inflows from the Transition Zone into the Centro Subarea. (Hastings Decl., ¶ 9.) In light of these identified potential inaccuracies in Watermaster's 2024 PSY Update, GSWC requested that the Court order Watermaster to undertake further evaluation of the PSY for the Alto Subarea, including the Transition Zone, and the Centro Subarea, using the best available data and sound science and engineering. (Hastings Decl., ¶ 9.)

Following the Court hearing on June 24, 2024, the Court issued a ruling granting Watermaster's motion in part and denying it in part on July 3, 2024. (Hastings Decl., ¶ 10; GSWC Evidence, Exh. 3 [July 3, 2024 Court Order].) The Court approved Watermaster's proposed PSY for each Subarea "without prejudice to challenges to the manner in which the Watermaster has calculated PSY and the sufficiency of the factual investigation on which those calculations are based." (GSWC Evidence, Exh. 3, p. 177.) The Court further acknowledged that GSWC may bring a motion to seek the relief described in its Opposition by a date agreed upon with the Watermaster. (GSWC Evidence, Exh. 3, p. 177.) GSWC and the Watermaster subsequently met and agreed upon a hearing date and briefing schedule. (Hastings Decl., ¶ 11.)

B. Factual Background

Golden State Water Company's Operations in the Basin Area 1.

GSWC, formerly Southern California Water Company and a Party to the Judgment in this action, is a division of American States Water Company, a "Class A" utility regulated by the California Public Utilities Commission, provides water service to approximately 260,000 customers throughout California. GSWC's Mountain Desert District operates water systems within three of

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the Mojave Basin Area Subareas—Alto, Este, and Centro—and provides water service to 12,281 water service connections and a population of approximately 41,600 in and around the cities and communities of Barstow, Apple Valley, and Lucerne Valley. (Declaration of Toby B. Moore, Ph.D. ("Moore Decl."), ¶ 5.)

GSWC has adjudicated Base Annual Production rights of 940 acre-feet per year ("AFY") in the Alto Subarea, 178 AFY in the Este Subarea, and 14,407 AFY in the Centro Subarea. Groundwater produced from 29 wells located in these Subareas provides GSWC's sole source of supply for its Mountain Desert District customers. Accordingly, GSWC has a significant interest in implementation of the Judgment and management of the Basin Area, and in particular the sustainability of those Subareas in which GSWC operates and especially in the Centro Subarea. (Moore Decl., ¶ 8.)

2. Declining Water Levels and Water Quality in the Central Subarea

Since entry of the Judgment in 1996, water levels in the Centro Subarea have remained the same or continued to decline, despite Centro Subarea Producers reducing pumping consistent with the FPAs and Alto Subarea Producers purportedly meeting their Minimum Subarea Obligations, as Watermaster has reported in its Annual Reports. (Moore Decl., ¶ 9.) Falling water levels became particularly pronounced beginning in late 2017 near the City of Barstow and Lenwood and Hodge Recharge Sites resulting in water quality impacts to GSWC's Bradshaw Wellfield which consists of eleven active production wells. (Moore Decl., ¶ 10.) Correlative with the declining water levels in these wells, nitrate levels in four of the production wells increased to levels exceeding the Nitrate as Nitrogen minimum contaminant level of 10 milligrams per liter. (Moore Decl., ¶ 11.) In response to these impacts in 2017, GSWC removed these four wells from service and constructed a \$5 million nitrate treatment facility to treat and contain the nitrate impacted supply. (Moore Decl., ¶ 11.) Nitrate impacts continue to expand, threatening additional wells at the Bradshaw Wellfield and expansion of the existing treatment facility may be necessary. (Moore Decl., ¶ 11.) The on-going operation and maintenance cost of the nitrate system is on the order of \$ 2 million per year. (Moore Decl., ¶ 11.)

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Since entry of the Judgment in 1996, the Watermaster Engineer has reconsidered the PSY for each Subarea on several occasions, including most recently in 2019 before the 2024 PSY Update. (Moore Decl., ¶¶ 12–13; see also Judgment, ¶ 24(o), Exh. C [containing the Engineering Appendix outlining Watermaster's method to calculate the Basin Area hydrological inventory of which PSY is a part].) GSWC participated in Watermaster's PSY update process in 2019, including submitting comments on the draft Twenty-fifth Annual Report of the Mojave Basin Area Watermaster (Water Year 2017-18), which incorporated materials from Watermaster's PSY update in 2019, and meeting with Watermaster staff to express concerns about the assumptions for surface water inflows and Subsurface Inflows into the Centro Subarea from the Transition Zone. (Moore Decl., ¶¶ 12–20.)

For Watermaster's recent 2024 PSY Update, GSWC continued to meet with Watermaster personnel and to provide written comments to the Watermaster's Board of Directors expressing GSWC's continuing concerns with Watermaster's calculation of the PSY as provided in its 2024 PSY Update, and specifically with regard to Watermaster's estimate of flows from the Alto Subarea, which includes the Transition Zone, to the Centro Subarea. (Moore Decl., ¶¶ 19–21; Hastings Dec., ¶¶ 7, 9; GSWC Evidence, Exh. 13 and 14 [GSWC comment letters].) Additionally, Brownstein Hyatt Farber Schreck, LLP retained aquilogic, Inc., on behalf of GSWC, to investigate the causes of chronically declining water levels in production wells in the Centro Subarea. (Moore Decl., ¶ 21; see also GSWC Evidence, Exh. 13, pp. 953–965 [February 23, 2024 aquilogic, Inc. Memorandum]; Declaration of Anthony Brown ("Brown Decl."), ¶¶ 6–7, 10; GSWC Evidence, Exh. 1 [Expert Report of Anthony Brown: Hydrologic Conditions and Water Flow Between the Alto Subarea and the Centro Subarea ("Expert Report")].) Watermaster's response to GSWC's comments with the 2024 PSY Update (GSWC Evidence, Exh. 15 [Watermaster Response]) did not address GSWC's concerns regarding the adequacy of the water budget; advanced the alternative theory that declining water levels in the Centro Subarea are attributable to pumping, not lack of inflows from the Centro Subarea; and demonstrates that Watermaster does not intend to further update the estimates, assumptions, and modeled calculations contained in the water budget that comprises its PSY calculations. (Moore Decl., ¶ 22; Hastings Decl. ¶ 7; GSWC Evidence, Exh. 15, pp. 975, 980

[Watermaster Response, pp. 6, 11].)

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III. STANDARD OF REVIEW

Under the Judgment, "[a]ny action, decision, rule or procedure of Watermaster . . . shall be subject to review by the Court[.]" (Judgment, ¶ 36; see also Watermaster, Rules and Regulations of the Mojave Basin Area Watermaster, § 10 (Oct. 29, 2008) ("Watermaster Rules").) "The Court's review shall be de novo and the Watermaster decision or action shall have no evidentiary weight in such proceeding." (Judgment, ¶ 36(d) (emphasis in original); Watermaster Rules, § 10(f).) A de novo hearing "means a new hearing, or a hearing the second time. . . . It is in no sense a review of the hearing previously held, but is a complete trial of the controversy, the same as if no previous hearing had ever been held[.]" (Fudge v. City of Laguna Beach (2019) 32 Cal.App.5th 193, 203, quoting Buchwald v. Katz (1972) 8 Cal.3d 493, 501.) In its de novo review, the Court has: "[f]ull jurisdiction, power and authority . . . for interpretation, enforcement or carrying out of this Judgment " (Judgment, ¶ 19.)

IV. **ARGUMENT**

Implementation of the Judgment Requires an Accurate PSY Based on the Best A. Available Data and Sound Science

1. PSY is a Critical Component of the Judgment's Physical Solution

The Judgment establishes a Physical Solution that maintains proper water balances within each Subarea and between adjoining Subareas, which are hydrologically interrelated. (Judgment, ¶ 22.) Accordingly, within each Subarea, the Judgment allows each Producer to pump sufficient groundwater for a reasonable beneficial use, while gradually reducing each Producer's pumping until each Producer pumps their ratable share of the Subarea's PSY and further requires each Producer to purchase Replacement Water for any pumping in excess of their share of the PSY. (See Judgment, Art. V, ¶¶ 23–44.) Watermaster's calculation of the PSY for each Subarea must account for the flows between adjoining Subareas that are required to ensure each Subarea's compliance with its Subarea Obligation. (See Judgment, ¶¶ 4(jj), 13, Exh. G.)

The Judgment defines the PSY as:

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The highest average Annual Amount of water that can be produced from a Subarea: (1) over a sequence of years that is representative of long-term average annual natural water supply to the Subarea net of long-term average annual natural outflow from the Subarea, (2) under given patterns of Production, applied water, return flows and Consumptive Use, and (3) without resulting in a long-term net reduction of groundwater in storage in the Subarea.

(Judgment, ¶ 4(aa).) PSY thus reflects the Judgment's approach to calculate the "safe yield" for each Subarea of the Basin Area—i.e., the maximum quantity of water that can be withdrawn from a groundwater supply under a given set of conditions without causing undesirable results. (City of Los Angeles v. City of San Fernando (1975) 14 Cal.3d 199, 278, disapproved on other grounds in City of Barstow v. Mojave Water Agency (2000) 23 Cal.4th 1224, 1248; see also Cal. Const., art. X, § 2.)

To calculate the PSY, the Judgment requires that the Watermaster rely on pertinent hydrologic data and estimates, including the factors and criteria identified in Exhibits C and H of the Judgment. (See Judgment, ¶¶ 2(a), 24(o), (w), Exhs. C & H.) These factors and criteria include the measured or estimated inflow and outflows between adjacent Subareas. (Judgment, ¶ 4(aa), Exhs. C & H.)

Recognizing the interconnectivity of each Subarea—i.e., outflows from one Subarea constitute the inflows to the adjoining downstream Subarea—the Judgment sets forth rights and obligations between Subareas:

> In the aggregate, Producers within certain Subareas have rights, as against those in adjoining upstream Subareas, to receive average Annual water supplies and, in any one Year, to receive minimum Annual water supplies equal to the amounts set forth in Exhibit "G", in addition to any Storm Flows. In turn, in the aggregate, Producers within certain Subareas have an obligation to provide to adjoining downstream Subareas such average Annual water supplies in the amounts and in the manner set forth in Exhibit "G". [...] Producers in each of the Subareas have rights in the aggregate, as against each adjoining downstream [...] to divert, pump, extract, conserve, and use all surface water and Groundwater supplies originating therein or accruing thereto, and so long as the adjoining downstream Subarea Obligations are satisfied under this Judgment and there is compliance with all of its provisions.

(Judgment, ¶ 13 (emphasis added).) The Judgment generally refers to each of these above obligations as a "Minimum Subarea Obligation," which is generally defined as: "The minimum

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Annual amount of water a Subarea is obligated to provide to an adjoining downstream Subarea or
the Transition Zone as set forth in Exhibit "G." (Judgment, ¶ 4(r).) The Transition Zone is defined
as a "portion of the Alto Subarea, shown on Exhibit "A," that lies generally between the Lower
Narrows and Helendale Fault." (Judgment, ¶ 4(mm).) The boundary between the Centro Subarea
and the Alto Subarea, which includes the Transition Zone, is the Helendale Fault. (See Judgment,
Exh. A.)

Exhibit G establishes the specific numeric thresholds for each Subarea's respective obligations that inform Watermaster's calculation of the inflows for the PSY of each Subarea. For the Alto Subarea's obligation to the Centro Subarea, Paragraph 1 provides:

> Producers in the respective Subareas shall have the obligation to provide the following average Annual and minimum Annual Subsurface Flows and/or Base Flows per Year: [...]

> Alto Subarea Producers--an average Annual combined Subsurface Flow and Base Flow of 23,000 acre-feet per Year to the Transition Zone. For the purposes of Paragraph 6 of this Exhibit G [Subsurface Flow Assumptions], the Subsurface Flow component shall be deemed to be 2,000 acre-feet per Year.

(Judgment, Exh. G, ¶ 1, 1(e).) Exhibit G establishes an initial estimate of 2,000 AFY for Subsurface Flow, 4 thereby establishing a Base Flow 5 of 21,000 AFY to the Transition Zone boundary. 6 (See Judgment, Exh. G, ¶¶ 1(e), 6; see also Judgment, Ex. C, ¶ A.) The Subsurface Flow and Base Flow amounts serve as the Alto Subarea's obligation to the Centro Subarea. (Judgment, Exh. G, ¶ 1(e).) Further, the Subsurface Flow estimate is a necessary component of the PSY for the Centro Subarea. (GSWC Evidence, Exh. 4. pp. 197–199, 204 [2024 PSY Update, pp. 12–14, 19].)

Based on the PSY, Watermaster adjusts the FPA for each Subarea, which dictates a

⁴ "Subsurface Flow" means "Groundwater which flows beneath the earth's surface." (Judgment, ¶

⁵ "Base Flow" means "That portion of the total surface flow measured Annually at Lower Narrows which remains after subtracting Storm Flow." (Judgment, ¶ 4(h).) For this definition, Storm Flow means "That portion of the total surface flow originating from precipitation and runoff without having first percolated to Groundwater storage in the zone of saturation and passing a particular point of reckoning, as determined annually by the Watermaster." (Id. at (hh).)

^t Exhibit C to the Judgment further explains the process to establish the Base Flow and Storm Flow in the Mojave River at the Lower Narrows (Transition Zone boundary with the Alto Subarea) to estimate inflows into the Centro Subarea. (See Judgment, Ex. C, ¶ B(1).)

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Producer's share of the amount it can pump from the Subarea in a year without incurring as			
obligation to provide Replacement Water. (Judgment, ¶¶ 4(k), 24(o), Ex. H, ¶ 2(a); see also			
Watermaster Rules, ¶ 15(A) [describing Watermaster's process to set PSY and FPA].) The			
Watermaster annually compares each Subarea's FPA with the estimated PSY. (Judgment, ¶ 24(o)			
Ex. H, ¶ 2(a).) When FPA exceeds PSY, the Watermaster recommends that the Court reduce the			
FPA; when the FPA is below the PSY, Watermaster may recommend that the Court increase the			
FPA. (Judgment, ¶ 24(o), Ex. H, ¶ 2(a).)			

Accordingly, PSY is a critical component of the Physical Solution and the accuracy of the PSY for each Subarea is necessary to ensure effective basin management under the Judgment.

2. The Judgment Requires Watermaster to Evaluate PSY Based on the Best Available Data and Sound Science

Given the importance of the calculation of PSY and FPA under the Judgment and its corresponding effects on Producers' rights—both as a function of FPA and each Subarea Obligation—the Watermaster has the obligation to:

> install, operate and maintain wells, measuring devices and/or meters necessary to monitor stream flow, precipitation and groundwater levels and to obtain such other data as may be necessary to carry out the provisions of this Judgment, including a study of the Basin Area phreatophyte consumptive use.

(Judgment, ¶ 24(e) (emphasis added); Judgment, at Ex. G ¶ 2(b), 6 [requiring installation of monitoring wells in the Transition Zone and at Subarea boundaries].) Importantly, the Judgment requires that Watermaster must:

> rely on and use the best available records and data to support the implementation of this Judgment. Where actual records of data are not available, Watermaster shall rely on and use sound scientific and engineering estimates.

(Judgment, ¶ 24(w) (emphasis added).)

Recognizing the need for continuous improvement, the Judgment establishes the Exhibits as initial estimates or calculation frameworks that must evolve over time. Paragraph 24(w) of the Judgment provides:

> Watermaster may use preliminary records of measurements, and, if revisions are subsequently made, Watermaster may reflect such revisions in subsequent accounting. Exhibit "C" sets forth methods

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and procedures for determining surface flow components. Watermaster shall use either the same procedures or procedures that will yield results of equal or greater accuracy.

(Judgment, ¶ 24(w) (emphasis added); see Judgment, at Exh. C, ¶ A [requiring Watermaster to use "all available pertinent hydrologic data and estimates, including at least the factors, or changes in the factors, shown in the attached Table C-1"].) The Judgment therefore requires Watermaster to use the best available data and sound scientific and engineering estimates to maximize the reasonable beneficial use of water under the Judgment.

Watermaster's Water Budget for the 2024 PSY Update Is Insufficient and Likely Overestimates Inflow to the Centro Subarea

Watermaster's calculation of PSY is based on a water budget that is described in Table 5-1 of each Annual Report. (See, e.g., GSWC Evidence, Exh. 5, p. 366 [30th Annual Report, Table 5-1, p. 42]; see also GSWC Evidence, Exh. 4, p. 204 [2024 PSY Update, p. 19].) The following water budget components for the Transition Zone are based on at least in part direct measurements: (1) surface water inflows, (2) imports, and (3) consumptive use by humans (agricultural and urban) (i.e., measured groundwater pumping less estimated return flows). (GSWC Evidence, Exh. 4, p. 204 [2024 PSY Update, p. 19]; GSWC Evidence, Exh. 1, pp. 45, 47–48, 77 [Expert Report, Tabs. 4-1 & 4-3, Fig. 6-1].)

By contrast, the following water budget components for the Transition Zone are calculated estimates or assumptions: (1) groundwater discharge to Transition Zone, (2) subsurface inflow, (3) Este/Oeste inflow, (4) surface water outflow, (5) subsurface outflow, and (6) consumptive use by phreatophytes (plant life). (GSWC Evidence, Exh. 4, p. 204 [2024 PSY Update, p. 19]; GSWC Evidence, Exh. 1, pp. 45, 47–48, 77 [Expert Report, Tabs. 4-1 & 4-3, Fig. 6-1].) These estimates and assumptions stem from various sources, including the Judgment (e.g., Subsurface Flow),⁷ reports from 1996 (e.g., plant life uses), 8 or groundwater modeling results (e.g., groundwater discharge lost to the Transition Zone). 9 While the Judgment establishes initial estimates and assumptions, it also supports continuous incremental improvement to each component of the water

⁷ Judgment, Exh. G, \P 1, 1(e).

GSWC Evidence, Exh. 4, p. 204 [2024 PSY Update, p. 19, fn. 10].

GSWC Evidence, Exh. 4, p. 204 [2024 PSY Update, p. 19, fn. 4].

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budget that underlies the calculations Watermaster is required to perform as part of its administration of the Judgment. (Judgment, ¶ 23; 24(e), (k), (w), Exh. C & G; see also Exh. H, ¶ 2(a) [describing Watermaster's process when adjusting PSY to consider riparian habitat areas, listed species impacts, and other public trust resources, among other factors].)

GSWC's independent analysis of the 2024 PSY Update indicates the Watermaster Engineer's 2024 PSY is insufficient. (Brown Decl., ¶ 11; GSWC Evidence, Exh. 1, pp. 14, 24–25 [Expert Report, §§ 2.0, 4.2].) The water budgets presented in both the 2024 PSY Update (see GSWC Evidence, Exh. 4, pp. 204 [Tab. 1, p. 19]) and Watermaster Annual Reports (see GSWC Evidence, Exh. 5, pp. 366 [Tab. 5-1, p. 42]) do not provide enough information to determine if the Centro receives sufficient inflow because: (1) Watermaster's simplified water budget is not adequately detailed and does not employ current approaches used throughout California; and (2) there are no measurements of surface water inflow to the Centro Subarea. (GSWC Evidence, Exh. 1, p. 24 [Expert Report, § 4.2].)

First, the inflow assumptions in the water budget for the Centro Subarea likely do not reflect declining water levels in the Centro Subarea. Watermaster's inflow estimates, which range from 30,000 AFY to 35,000 AFY, are significantly higher than the total average annual verified production in the Centro of 17,773 AFY. (GSWC Evidence, Exh. 1, p. 25 [Expert Report, § 4.2].)

Second, there are no surface water measurements. If construction of additional gages at the boundary of the Alto and Centro Subareas (e.g., at the boundary of the Transition Zone) is infeasible, as Watermaster claims (GSWC Evidence, Exh. 15 [Watermaster Response, p. 2].), remote sensing can be used for this purpose. (GSWC Evidence, Exh. 1, pp. 26, 35–37 [Expert Report, §§ 4.2, 6.2– 6.3]; see also GSWC Evidence, Exhs. 7–12 [remote sensing reports].)

Third, Watermaster's estimation of agricultural consumptive use employs techniques (ET estimates based on land area) that have largely been supplanted by the use of remote sensing (i.e., satellite) data. Satellite remote sensing data is the current standard for estimating ET from various sources. (GSWC Evidence, Exh. 1, pp. 25, 34–37 [Expert Report, §§ 4.2, 6.2–6.3]; see also GSWC Evidence, Exhs. 7 –12[remote sensing reports].)

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Finally, the Upper Mojave River Basin (UMRB) model is too limited in spatial extent to be useful for simulations of groundwater in the Transition Zone and the model cannot yet simulate the potentially complex groundwater flow dynamics between the Transition Zone and the Centro Subarea because a portion of the Transition Zone and the Centro Subarea are not included in the model. (GSWC Evidence, Exh. 1, pp. 26–2 [Expert Report, § 4.3].)

The Watermaster Engineer acknowledges that there are "ungaged" surface water inflows and outflows (GSWC Evidence, Exh. 15, p. 973 [Watermaster Response, Tab. 1, p. 4]), but continues to rely on the Judgment's initial estimates and assumptions, primarily on the further "assumption that average change in storage in the Transition Zone has been stable for most of the wells since at least 1993." (GSWC Evidence, Exh. 15, p. 973, 977, 979–980 [Watermaster Response, pp. 4, 8, 10–11 (emphasis added)].) The assertion that historical estimates of flows from the Transition Zone into the Centro Subarea have not changed significantly, fails to consider whether the basis or assumptions underlying those estimates are both consistent and accurate. (GSWC Evidence, Exh. 1, pp. 8, 24– 25 [Expert Report, p. § 4.2].) As aquilogic explains, historical and current data suggesting no net change in groundwater storage may mask a more dynamic hydrologic system that does not support Watermaster's assumptions. (GSWC Evidence, Exh. 1, p. 23, 38 [Expert Report, p. §§ 4.2, 6.4].)

In short, Watermaster's water budget contains too many estimates and assumptions to permit reasonable reliance on the results. (GSWC Evidence, Exh. 1, p. 24 [Expert Report, § 4.2] (describing the data required to permit the usefulness of the water budget approach alone for calculating PSY).) Thus, it is unclear whether Watermaster's assertion that "[t]he Alto subarea obligation to the Transition Zone has been met every year" is accurate or sufficient to show that the Centro Subarea receives the inflows assumed in the Judgment without further analysis. (Watermaster Response, p. 11.) A detailed and updated Transition Zone water budget and groundwater modeling exercise is needed to improve the accuracy in the PSY for each Subarea, as required by the Judgment. Based on the available data, aquilogic's independent analysis concludes that Watermaster's water budget assumptions and calculations likely overestimate inflow to the Centro Subarea. (GSWC Evidence, Exh. 1, pp. 14, 80–86 [Expert Report, § 2.0, App. A].)

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In summary, GSWC's independent analysis raises concerns that the Watermaster Engineer's calculation does not rely on the best available data and modern scientific and engineering methods as required by the Judgment—to estimate flows at the Transition Zone boundary with the Centro Subarea. Accordingly, the Court must order Watermaster to reevaluate the 2024 PSY Update to evaluate the potential complex groundwater flow dynamics in the Transition Zone and the implications for PSY and FPA for the Alto and Centro Subareas, as well as the Alto Subarea Obligation.

The Watermaster Engineers's Alternate Theory About The Cause Of Falling C. Water Levels In The Centro Subarea Is Not Supported By The Evidence And Ignores GSWC's Fundamental Concerns About The Calculation Of PSY For The Transition Zone And Centro Subarea

Instead of reevaluating the Transition Zone water budget based on GSWC's concerns, and despite the fact that the total average annual verified production for the Centro Subarea is significantly less than (approximately 50%) of Watermaster's estimated inflows to the Centro, the Watermaster Engineer instead offers an alternate theory for declining water levels in the Centro Subarea—that concentrated pumping in small, segmented aquifers along the Mojave River do not receive sufficient recharge relative to pumping in the Centro Subarea. (GSWC Evidence, Exh. 15, p. 971, 974 [Watermaster Response, pp. 2, 5]; GSWC Evidence, Exh. 1, p. 28 [Expert Report, § 5.0]; see also Moore Decl., ¶¶ 10–23 [outlining GSWC's concerns that have persisted since the prior PSY update in 2019].) However, aquilogic's statistical analysis to test the Watermaster Engineer's theory shows this theory is likely incorrect.

As described in detailed in aquilogic's Expert Report, aquilogic undertook a series of statistical analyses—comparing depth to water vs. river discharge, depth to water vs. time, and depth to water vs. pumping—to test Watermaster's theory. These analyses confirmed GSWC's observations that their Barstow-area production wells are experiencing chronic water level declines (GSWC Evidence, Exh. 1, pp. 30–31 [Expert Report, § 5.2.1]) and that water levels declines do not show a direct correlation or trend relative to groundwater production magnitude (GSWC Evidence, Exh. 1, p. 32 [Expert Report, p. § 5.3]). Rather, aquilogic concludes, other factors, such insufficient inflow from the Alto Subarea and Transition Zone appear to play a major role in the observed water level declines.

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Accordingly, the Watermaster Engineer's theory does not explain declining water levels in the Centro Subarea and does not address GSWC's fundamental concerns with the accuracy of the 2024 PSY Update. Rather, it is more likely that Watermaster's estimate of inflows to the Centro Subarea (approximately 30,000 to 35,000 AFY) is overstated and is not in fact occurring. (GSWC Evidence, Exh. 1, pp. 14, 28 [Expert Report, §§ 2.0, 5.0]).

D. Watermaster Must Reevaluate its 2024 PSY Update Assumptions to Implement the Judgment

As explained above in Section IV.B, Watermaster's 2024 PSY Update relies on a simplified water budget that incorporates historical estimates and assumptions and outdated techniques (GSWC Evidence, Exh. 1, pp. 15–16, 24–25, 33 [Expert Report, §§ 3.1, 4.2, 5.3]) that do not reflect actual groundwater conditions in the Centro Subarea, including chronically falling groundwater levels (GSWC Evidence, Exh. 1, pp. 30-31 [Expert Report, § 5.1.1]). To effectively implement its administrative duties under the Judgment, the Watermaster must undertake further updating of the PSY for the Alto and Centro Subareas and Transition Zone by testing its hypotheses and assumptions, performing additional analysis and modeling, and installing additional monitoring equipment to verify its estimates or replace estimates with measured data. (See Judgment, \P 2(a), 4(aa), 24(k), (o), (w), Exh. C & H; Watermaster Rules, §§ 2, 21.) As more particularly described in aquilogic's Expert Report, these activities should include, at a minimum: (1) reevaluating the water budgets for the Alto Subarea, including the Transition Zone, and the Centro Subarea, based on additional statistical analyses, technical analyses, and UMRB modeling of Consumptive Use by agricultural and phreatophytes, storage losses in the Transition Zone, surface and subsurface flows; (2) assessing whether obligations under the Judgment are being met; and (3) developing a plan to conduct additional analyses necessary to implement the Judgment. (GSWC Evidence, Exh. 1, pp. 34–38 [Expert Report, § 6.0.]; see also Proposed Order filed concurrently herewith.)

To address chronically falling water levels in the Centro Subarea as soon as possible, this Motion requests that the Court order Watermaster to:

- 1. Evaluate the PSY for the Alto Subarea, including the Transition Zone, and the Centro Subarea, including, but not limited to, the calculation of the PSY; the factual investigation on which those calculations are based; and any underlying assumptions inherent in the calculations whether specified in the Judgment or otherwise; and (b) submit to the Court a report containing Watermaster's findings and calculations as a component of its Thirty-first Annual Report of the Mojave Basin Area Watermaster Water Year 2023–24; and
- 2. Prepare and submit to the Court a report identifying recommendations and a timeline to improve hydrologic data collection and scientific and engineering estimates for preparation of future updates to PSY and continued implementation of the Judgment, which shall consider the recommendations contained in the Expert Report, as a component of its Thirty-second Annual Report of the Mojave Basin Area Watermaster Water Year 2024–25. (See Proposed Order, filed concurrently herewith.)

V. **CONCLUSION**

Pursuant to Paragraph 19 of the Judgment, GSWC respectfully requests that the Court grant GSWC's proposed Order in full. The proposed Order is necessary and appropriate to enforce Watermaster's obligation to rely on and use the best available data and to use sound science when making the calculations and determinations required in the operation of the Physical Solution mandated by the Judgment, including Watermaster's calculation of the PSY for the Alto and Centro Subareas—a critical component of the Watermaster's annual recommendation to the Court of the FPA for these Subareas and the Alto Subarea Obligation to the adjacent downstream Centro Subarea.

21 Dated: September 5, 2024

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PROOF OF SERVICE

I am over the age of eighteen years and not a party to the within-entitled action. I am employed in Santa Barbara County, California. My business address is Brownstein Hyatt Farber Schreck, LLP, 1021 Anacapa Street, 2nd Floor, Santa Barbara, California 93101-2711. My electronic service address is Meldridge@bhfs.com. On September 5, 2024, I served a copy of the following document(s):

GOLDEN STATE WATER COMPANY'S MOTION TO **ENFORCE JUDGMENT**

BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the X document(s) listed above to be sent to the persons at the e-mail addresses listed below

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I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on September 5, 2024, at Santa Barbara, California.

PROOF OF SERVICE

STATE OF CALIFORNIA } COUNTY OF SAN BERNARDINO}

I am employed in the County of the San Bernardino, State of California. I am over the age of 18 and not a party to the within action; my business address is 13846 Conference Center Drive, Apple Valley, California 92307.

On September 6, 2024, the document(s) described below were served pursuant to the Mojave Basin Area Watermaster's Rules and Regulations paragraph 8.B.2 which provides for service by electronic mail upon election by the Party or paragraph 10.D, which provides that Watermaster shall mail a postcard describing each document being served, to each Party or its designee according to the official service list, a copy of which is attached hereto, and which shall be maintained by the Mojave Basin Area Watermaster pursuant to Paragraph 37 of the Judgment. Served documents will be posted to and maintained on the Mojave Water Agency's internet website for printing and/or download by Parties wishing to do so.

Document(s) filed with the court and served herein are described as follows:

GOLDEN STATE WATER COMPANY'S NOTICE OF MOTION AND MOTION TO ENFORCE JUDGMENT; MEMORANDUM OF POINTS AND AUTHORITIES

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

Executed on September 6, 2024 at Apple Valley, California.

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