STEPHANIE OSLER HASTINGS (State Bar No. 186716) MACKENZIE W. CARLSON (State Bar No. 323850) BROWNSTEIN HYATT FARBER SCHRECK, LLP 1021 Anacapa Street, 2nd Floor Santa Barbara, CA 93101-2711 Telephone: 805.963.7000 Email: SHastings@bhfs.com
Attorneys for Plaintiff GOLDEN STATE WATER COMPANY



MAY 2 1 2024

J. Alvarez

# SUPERIOR COURT OF THE STATE OF CALIFORNIA

# FOR THE COUNTY OF RIVERSIDE

Coor	dinatio	n Pro	ceed	ing	Spec	ial	Titl	e
(Cal.	Rules	of Co	urt,	rule	3.55	0)		

MOJAVE BASIN AREA WATER CASES

CITY OF BARSTOW, et al.,

Plaintiff,

V.

CITY OF ADELANTO, et al.,

Defendant.

JCCP NO.: 5265 Lead Case No. CIV 208568

Assigned for All Purposes to the Honorable Harold W. Hopp, Dept. 1

GOLDEN STATE WATER COMPANY'S OPPOSITION TO MOJAVE WATER AGENCY'S MOTION TO ADJUST FREE PRODUCTION ALLOWANCE FOR WATER YEAR 2024-2025

[Filed concurrently with Declarations of Robert H. Abrams, Toby B. Moore, Stephanie Osler Hastings, and Notice of Lodging]

Date: Time:

June 4, 2024 8:30 am

Dept.:

1

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

27

28

1	TABLE OF CONTENTS	
2		
3	I. INTRODUCTION	4
4	II. BACKGROUND	
5	A. Procedural Background B. Factual Background	
	Factual Background     Golden State Water Company's Operations in the Basin Area	
6	2. Declining Water Levels and Water Quality in the Central Subarea	
7	III. ARGUMENT	
8	A. The Judgment Requires Watermaster to Evaluate PSY Based on the Best Available Science	e 8
9	B. Watermaster Estimates of Inflows into the Centro Subarea May Not Be Accurate	11
10	C. The Watermaster Response Does Not Address GSWC's Fundamental Concerns about the Calculation of PSY for the Transition Zone and Centro Subarea	13
11	D. Watermaster Should Reevaluate its Transition Zone Assumptions to Implement the	
	IV. CONCLUSION AND REQUESTED FURTHER COURT ORDER	
12	IV. CONCLUSION AND REQUESTED FURTHER COURT ORDER	1 /
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		

2

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

1	TABLE OF AUTHORITIES
2	Page(s)
3	Cases
4 5	City of Barstow v. Mojave Water Agency (2000) 23 Cal.4th 1224
6	City of Los Angeles v. City of San Fernando
7	(1975) 14 Cal.3d 1999
8	City of Pasadena v. City of Alhambra (1949) 33 Cal.2d 9089
9	Statutes
10	California Sustainable Groundwater Management Act of 2014
11	Court Rules
12	Cal. Rules of Court, Rule 3.5501
13	Car. Rules of Court, Rule 3.330
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	
	3

Golden State Water Company ("GSWC") hereby submits this opposition to Mojave Water Agency's ("MWA") Motion to Adjust Free Production Allowance for Water Year 2024-2025 ("Motion").

### I. INTRODUCTION

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

GSWC takes no position with respect to the Watermaster's proposed Free Production Allowance ("**FPA**") for each of the Mojave Basin Area's Subareas for Water Year 2024-2025.

GSWC opposes the Motion solely on the grounds that the Mojave Basin Area Watermaster's ("Watermaster")<sup>2</sup> recent update of the Production Safe Yield ("PSY") for the Alto and Centro Subareas and the Transition Zone, which is filed in support of the Motion, is not based on the best available science and therefore may not accurately estimate the quantity of streamflow that flows into the Centro Subarea from the Transition Zone and further that the Watermaster's responses to GSWC's expressed concerns with the updated PSY suggests that the Watermaster Engineer does not intend to undertake the more rigorous technical analysis that is mandated by the Judgment.

PSY is an essential component of the Watermaster's annual calculation of FPA for each Subarea. The Judgment generally defines the PSY as the highest average amount of water that can be produced from a Subarea under representative, long-term average annual hydrology conditions (i.e., inflows and outflows), under given patterns of groundwater production and consumptive uses without resulting in a long-term reduction of groundwater in storage. To calculate the PSY for each Subarea, Watermaster develops a water budget—a mathematical analysis of inflows and outflows of a water system. Periodically, the Watermaster Engineer has updated the PSY for each Subarea to account for changes in hydrology or production patterns. Prior to 2024, the last updates of the PSY for each Subarea occurred in 2019.

For the Centro Subarea water budget, inflows include surface and subsurface flows, among other components. Since entry of the Judgment in 1996, the Watermaster has estimated surface water outflows from the Transition Zone, and thus inflows into the Centro Subarea, largely without the benefit of real-world verification from stream gages. After compiling the water budget,

<sup>2</sup> MWA serves as the Watermaster in this action.

All capitalized terms not defined here have the same meaning as set forth in the Judgment.

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

Watermaster adds or subtracts it from the total estimated production to calculate the PSY. Finally, based on the PSY, Watermaster adjusts the FPA for the Subarea, which dictates the quantity of water that each producer may pump from the Subarea in a given year without incurring an obligation to provide replacement water.

The accuracy of the Watermaster's calculation of flow across the Transition Zone is of critical importance to ensure compliance with the Judgment—specifically the Alto Subarea obligation—and thus to ensure adequate and sustainable supplies for all producers in the Centro Subarea. Accordingly, GSWC requests that the Court order Watermaster to undertake further consideration of the PSY for the Alto Subarea, including the Transition Zone, and the Centro Subarea, using the best available science and methodology, as further described herein, in advance of setting the FPAs for the Alto and Centro Subareas for 2025–26.

## II. BACKGROUND

# A. **Procedural Background**

In September 2022, the Court tasked the Watermaster with updating the PSY for all Subareas of the Basin Area under the Judgment. (Declaration of Stephanie Hastings ("Hastings Decl."), ¶ 4, Exh. A.)

In March 2023, the Watermaster Engineer delivered its preliminary recommendation to adjust the PSY for the Alto Subarea. The preliminary PSY was used to calculate FPAs in the Alto Subarea for Water Year 2023–2024 while the Watermaster Engineer prepared the PSY update for the other four Subareas by December 2023. On December 21, 2023, Watermaster filed a Status Report regarding its PSY and FPA calculations, advising the Parties to anticipate hearings on the PSY and FPA adjustments in February and March 2024 and providing a brief description of anticipated PSY changes.

On February 28, 2024, the Watermaster Engineer issued final reports with respect to its updated PSY calculations for each of the Subareas the Alto & Centro Water Supply Update ("Alto & Centro PSY Update") and the Transition Zone Water Supply Update ("Transition Zone PSY **Update**") (collectively, "**PSY Update**"), which are attached as Appendices A and B, respectively, to Exhibit 5 of the Declaration of Robert C. Wagner ("Wagner Declaration") attached to the Motion

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

as Exhibit C. (Motion, Exh. C, Exh. 5, App. A & B.) Also, on February 28, 2024, the Watermaster notified all parties of its proposed recommendation for FPA and, on March 27, 2024 adopted the 2024–25 FPA recommendation based on the updated PSY calculations. (Motion, p. 6.) The Watermaster also held workshops related to the PSY updates for Este, Oeste, Baja and Alto-Centro Subareas on March 13 and 24, 2024. (See Motion, Exh. B.)

On February 28, 2024, GSWC submitted comments on the PSY Update ("GSWC Comment Letter"). Included in the GSWC Comment Letter is a February 23, 2024 memorandum from Anthony Brown and Robert H. Abrams, aquilogic, Inc. ("aquilogic"), to Stephanie Hastings, Brownstein Hyatt Farber Schreck LLP, titled: "Progress Report and Mojave Basin Transition Zone Water Budget" ("aquilogic Memorandum") (Hastings Decl., ¶ 6, Exh. C; see also Notice of Lodging, Exh.1.)<sup>3</sup>

On March 27, 2024, GSWC submitted further comments on the PSY Update (Hastings Decl., ¶ 8, Exh. E; see also Motion, Exh. D) and on April 12, 2024, the Watermaster Engineer responded to the GSWC Comment Letter in its Memorandum from Robert Wagner, et. al. to Lee McElhaney ("Watermaster Response") (see Motion, Exh. D; see also Hastings Decl., ¶ 9.)

# В. 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 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

<sup>26</sup> 

<sup>27</sup> 28

<sup>&</sup>lt;sup>3</sup> On February 27, 2024, GSWC submitted its initial comments on the PSY Update. (Hastings, Decl., ¶ 5, Exh. B.) On February 28, 2024, GSWC submitted revised comments superseding its February 27, 2024 comment letter. (Hastings Dec., ¶ 6, Exh. C.) A redline comparison of the two comment letters is attached to the Hastings Declaration as Exhibit D. The aquilogic Memorandum attached to both the February 27, 2024 and February 28, 2024 comment letters is the same. (Hastings Dec., ¶ 7.) The Motion mistakenly attaches GSWC's superseded February 27, 2024 letter. (Motion, Exh. D.) GSWC respectfully requests that the Court's record include GSWC's February 28, 2024 comment letter, which is attached as Exhibit 1 to GSWC's concurrently filed Notice of Lodging.

communities of Barstow, Apple Valley, and Lucerne Valley. (Declaration of Toby B. Moore, Ph.D. ("Moore Decl."),  $\P$  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. <u>Declining Water Levels and Water Quality in the Central Subarea</u>

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 five million dollar 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 two million dollars per year. (Moore Decl., ¶ 11.)

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. (Moore Decl., ¶¶ 12–13; see also Judgment, ¶ 24(o), Exh. C [containing the Engineering Appendix outlining Watermaster's

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

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., ¶¶ 13–18.)

In response to Watermaster's recent PSY Update, GSWC has continued to meet with Watermaster personnel and to provide written comments to express GSWC's continuing concerns with Watermaster's calculation of the PSY, 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., ¶¶ 19–20; Hastings Dec., ¶¶ 5, 6, 8; Notice of Lodging, Exh. 1.)

## III. **ARGUMENT**

# The Judgment Requires Watermaster to Evaluate PSY Based on the Best A. **Available Science**

The Judgment establishes a Physical Solution that 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 PSY and further requires each Producer to purchase Replacement Water for any pumping in excess of their share. (See Judgment, Art. V, ¶¶ 23–44.) The accuracy of the PSY for each Subarea is critical to implement the Physical Solution imposed by the Judgment and to ensure effective basin management under the Judgment. The Judgment defines the PSY as:

> 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. (See City

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

of Barstow v. Mojave Water Agency (2000) 23 Cal.4th 1224, 1234; City of Los Angeles v. City of San Fernando (1975) 14 Cal.3d 199, 278; City of Pasadena v. City of Alhambra (1949) 33 Cal.2d 908, 929.)

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 defined as:

> The minimum Annual amount of water a Subarea is obligated to provide to an adjoining downstream Subarea or the Transition **Zone** or, in the case of the Baja Subarea, the minimum Annual Subsurface Flow at the MWA eastern boundary toward Afton in any Year, as set forth in Exhibit "G".

(Judgment,  $\P$  4(r) (emphasis added).) 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.)

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

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<sup>5</sup> of 21,000 AFY to the Transition Zone boundary. 6 (See Judgment, Exh. G, ¶ 6 [stating that the Subsurface Flow obligations have been established "initially at amounts equal to the estimated historical average Subsurface Flow across Subarea boundaries"]; see also Judgment, Ex. C, ¶ A, Tab. C-1.) The Subsurface Flow and Base Flow amounts serve as the Alto Subarea's obligation to the Centro Subarea. (See, e.g., Motion, pp. 4–5 [listing Subsurface Obligations as an obligation from the Alto Subarea to the Centro Subarea]; Motion, Exh. C, pp. 4– 5.) Further, Watermaster uses the Subsurface Flow estimate to inform its calculation of the PSY for the Centro Subarea. (See *Id.*, Alto & Centro PSY Update, pp. 1–2, Tab. 1.)

Based on the PSY, Watermaster adjusts the FPA for each Subarea, which dictates a Producer's share of the amount it can pump from the Subarea in a given year without incurring an obligation to provide Replacement Water. (Judgment, ¶¶ 4(k), 24(o), Ex. H, ¶ 2(a); see also Watermaster, Rules and Regulations of the Mojave Basin Area Watermaster, ¶ 15(A) (Oct. 29, 2008) [describing Watermaster's process to set PSY and FPA].) The Watermaster annually compares each

<sup>&</sup>lt;sup>4</sup> "Subsurface Flow" means "Groundwater which flows beneath the earth's surface." (Judgment, ¶

<sup>&</sup>lt;sup>5</sup> "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 the purpose of 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).)

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,  $\P$  B(1).)

Subarea's FPA with the estimated PSY. (Judgment, ¶ 24(o), Ex. H, ¶ 2(a).) When FPA exceed
PSY, the Watermaster recommends that the Court reduce the FPA; when the FPA is below the PSY
Watermaster may recommend the Court increase the FPA. (Id.)

Given the importance of the calculation of PSY and FPA under the Judgment and its corresponding effects on Producers' rights, 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); id. 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**. 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 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).) The Judgment further acknowledges the need for flexibility in implementation to allow implementation to evolve over time:

It is essential that this Physical Solution provide maximum flexibility and adaptability in order that the Court may be free to use existing and future technological, social, institutional and economic options in order to maximize reasonable beneficial use of the waters of the Basin Area. To that end, the Court's retained jurisdiction may be utilized where appropriate, to supplement the Physical Solution.

(Judgment, ¶ 21 (emphasis added).)

# B. Watermaster Estimates of Inflows into the Centro Subarea May Not Be Accurate

GSWC's independent, preliminary analysis of historical data indicates the Watermaster Engineer's assumptions and calculations may overestimate outflow from the Transition Zone into the Centro Subarea. (Notice of Lodging, Exh. 1; Abrams Decl., ¶¶ 10–22, Exh. 2, pp. 1, 5.)

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

First, historical measured data do not support the Watermaster Engineer's assumptions about the amount of annual stream losses occurring in the Transition Zone. (Abrams Decl., ¶ 17, Ex. 2, pp. 3–4) In the absence of measured stream flows at the Transition Zone boundary with the Centro Subarea, the Watermaster Engineer estimates outflows to the Centro Subarea based on the Lower Narrows gage, located at the upstream boundary of the Transition Zone with the Alto Subarea, contributions of treated waste water from the Victor Valley Water Reclamation Authority, and estimated annual stream losses from the Mojave River (i.e., surface water flows that recharge the underlying groundwater basin and are consumed by Producers and plant life) across the Transition Zone. (See Judgment, Exh. C, ¶ B(1); Alto & Centro PSY Update, p. 1; Transition Zone PSY Update, pp. 1–2; Abrams Decl., ¶¶ 9, 19, Ex. 2, p. 2.) A preliminary review of the available historical records—specifically, measured stream flow from the Wild Crossing gage between March 1966 through October 1970, which is the best available historical data for this specific location (Abrams Decl., ¶¶ 12–14, Ex. 2, p. 3)—appears to undermine the Watermaster Engineer's assumptions about the amount of annual stream losses occurring in the Transition Zone. (Abrams Decl., ¶¶ 17–22, Ex. 2, pp. 2–5.) The total average, annual stream losses (i.e., estimated groundwater recharge) in the Transition Zone between the Lower Narrows gage and Wild Crossing gage between March 1966 through October 1970 was approximately 51,500 AFY. (Abrams Decl., ¶ 17, Ex. 2, p. 4, Fig. 2.) When compared to the Judgment's estimate of Subsurface Flow between the Transition Zone and the Centro Subarea (2,000 AFY) and estimates of historical consumptive use, the fate of the remaining unaccounted for average annual stream losses within the Transition Zone is unclear. (Abrams Decl., ¶ 21, Ex. 2, p. 4, Fig. 3.) Groundwater pumping data from wells and consumptive use by phreatophytes (plant life) within the Transition Zone do not fully explain the discrepancy. (Abrams Decl., ¶ 21–22, Ex. 2, p. 4, Fig. 6.) In short summary, the historical Wild Crossing stream gage and groundwater pumping data show uncertainty about the amount of average annual stream losses actually occurring in the Transition Zone and further whether the Lower Narrows gage serves as an appropriate measuring point to estimate inflows into the Centro Subarea from the Transition Zone in satisfaction of the Alto Subarea Obligation to the Centro Subarea.

28

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

Second, Watermaster Engineer's Transition Zone water budget should be updated to align with current best practices, such as those applicable to basins subject to the California Sustainable Groundwater Management Act of 2014. (Abrams Decl., ¶ 27, Ex. 2, pp. 6–7.) For example, some of the Transition Zone water budget terms, such as surface water outflow, consumptive use by phreatophytes, and return flows, are not updated annually and should be. (Abrams Decl., ¶ 8.) A detailed 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. (See Abrams Decl., ¶¶ 27–29, Ex. 2, pp. 6–7; see also Motion, Exh. D. [California Department of Fish and Wildlife requesting for more detailed information on Watermaster's estimate of surface water inflow into the Centro Subarea from the Transition Zone].)

In summary, GSWC's 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.

# C. The Watermaster Response Does Not Address GSWC's Fundamental Concerns about the Calculation of PSY for the Transition Zone and Centro Subarea

Watermaster dismisses GSWC's concerns about the uncertainties in the Transition Zone water budget based on Watermaster's longstanding assumptions. (Watermaster Response, p. 2; see Moore Decl., ¶¶ 13–20 [outlining GSWC's that have persisted since the prior PSY update in 2019].) The Watermaster Engineer contends that its estimates of inflows into the Centro Subarea under the Judgment are appropriate absent falling water levels in the Transition Zone and corresponding decreases to the amount of groundwater in storage. (Watermaster Response, pp. 2, 11.) But as explained in the aquilogic Memorandum, this rationale does not provide sufficient evidence to explain the discrepancy noted above.

The Watermaster Engineer provides an estimated Transition Zone water budget for Water Year 2023 that concludes there is no change in storage within the Transition Zone and consumptive uses within the Transition Zone (12,561 AFY) were approximately equal to the estimated stream losses in the Transition Zone (14,675 AFY). (Watermaster Response, pp. 3–5, Tab. 1.) GSWC does not dispute that the overall change in storage within the Transition Zone may be zero at times;

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

however, Watermaster's evidence is not dispositive as to whether inflows into the Transition Zone, plus Victor Valley Water Reclamation Authority discharges, less estimated consumptive uses are equivalent to inflows into the Centro Subarea. (See Abrams Decl., ¶¶ 9, 19–22, Ex. 2, p. 5 ["[T]he water-level data may appear to show that the change in groundwater storage in the Transition Zone is zero, when in fact the groundwater flow system is highly dynamic and may include significant net stream recharge."].) Because Watermaster Engineer's analysis relies on a Transition Zone water budget that is not sufficiently detailed to evaluate other factors that impact inflows into or to explain declining water levels in the Centro Subarea, Watermaster should undertake further analysis to evaluate the potentially complex groundwater flow dynamics in the Transition Zone. (Abrams Decl., ¶¶ 8, 19–27.)

In addition, the Watermaster Engineer does not adequately explain the discrepancies between stream flow losses (i.e., groundwater recharge) and consumptive uses when the Wild Crossing gage was in use. (See Abrams Decl., ¶¶ 25–27.) The Watermaster Engineer cites to historically higher average annual pumping of 27,885 AFY in the Transition Zone between 1966 and 1970, however, this information does not explain the approximate average 23,615 AFY that are unaccounted for based on the estimated average stream losses of 51,500 AFY over the same period. (Watermaster Response, p. 5; see Abrams Decl., ¶ 17, 25 [discussing differences associated with use of estimated historical average instead of an estimate historical median to estimate stream losses for the water budget].) The Watermaster Engineer's assertion that pumping between the Helendale Fault and the Wild Crossing gage accounts for this discrepancy is not adequately supported by measured data; it is based solely on minimal analysis of historic aerial imagery. (See Watermaster Response, p. 5, Fig. 2; Abrams Decl., ¶¶ 25–26.)

Finally, the Watermaster Engineer's assertion that historical estimates of flows from the Transition Zone into the Centro Subarea have not changed significantly (Watermaster Response, pp. 8, 10–11) fails to consider whether the basis or assumptions underlying those estimates are both consistent and accurate (Abrams Decl., ¶¶ 8, 25–28). 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. (Abrams Decl., ¶¶ 19–22, 24–28, Exh. 2, pp. 3–

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

5.) Therefore, 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.)

Given the Watermaster Response, GSWC is concerned that the Watermaster does not intend to undertake a rigorous analysis of the assumptions used to calculate the PSY for the Transition Zone and Centro Subarea and that as a result the Centro Subarea will continue to experience declining water levels.

# D. Watermaster Should Reevaluate its Transition Zone Assumptions to Implement the Judgment

Watermaster has the authority and duty to analyze and verify each assumption in the PSY Update. The Judgment requires that the Watermaster rely on "all available pertinent hydrologic data and estimates," including the factors and criteria identified in Exhibits C and H of the Judgment. (Judgment, Exh. C,  $\P$  A; see id.,  $\P$  2(a), 24(o), (w), Exh. H.) These factors and criteria include the measured or estimated inflow and outflows between adjacent Subareas. (Judgment, ¶ 4(aa), Exhs. C, G & H.) Anticipating the need for the Judgment's Physical Solution to evolve with "future technological, social, institutional and economic" developments, the Judgment reserves the Court with continuing jurisdiction and emphasizes the need for flexibility. (Judgment,  $\P$  1(ii), 19, 21.) It further emphasizes that the Watermaster must "rely on and use the best available records and data to support implementation of th[e] Judgment" and use "sound scientific and engineering estimates" when data are not available. (Judgment,  $\P 24(w)$ .)

Watermaster's PSY Update and Transition Zone water budget estimates use the general approached outlined in Table C-1 of the Judgment. (Judgment, Exh. C, Tab. C-1; Alto & Centro PSY Update, Tab. 1; Watermaster Response, Tab. 1.) However, this general approach is only as good as measurement data and underlying assumptions. (Abrams Decl., ¶ 8.) For example, as noted on Table 1 of the Alto & Centro PSY Update, the following water budget components for the Transition Zone are based on direct measurements: (1) surface water inflows, (2) imports, and (3) consumptive use by humans (agricultural and urban) (i.e., measured groundwater pumping less

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

estimated return flows). And, the following water budget components are calculated estimates: (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). (Abrams Decl., ¶ 9.) Table 1 of the Watermaster Response contains a similar mix of measurements and estimates for its water budget. (Abrams Decl.,  $\P$  9.)

These estimated numbers stem from various sources, including the Judgment (e.g., Subsurface Flow), 8 reports from 1996 (e.g., plant life uses), 9 or groundwater modeling results (e.g., groundwater discharge lost to the Transition Zone). <sup>10</sup> The Judgment supports continuous incremental improvement to each estimate. The Judgment provides that "Subsurface Flow obligations have been established *initially* at amounts equal to the *estimated* historical average Subsurface Flow across Subarea boundaries." (Judgment, Exh. G, ¶ 6 (emphasis added).) The Judgment further provides that the Watermaster shall install monitoring wells at the Subarea boundaries and "develop methodology for future determinations of actual Subsurface Flow." (Id.; see also Judgment, ¶ 24(e).) Paragraph 2(a) of Exhibit H describes the Watermaster's process when adjusting PSY to consider riparian habitat areas, listed species impacts, and other public trust resources, among other factors. Such an analysis necessarily requires regular evaluation and update to phreatophyte consumptive uses. (Abrams Decl., ¶ 16.) Further, the Watermaster expressly acknowledges that many water supply components are now calculated based on the results from the United State Geological Survey's ("USGS") groundwater flow model and the Mojave Water Agency's Upper Mojave Basin Area Model, neither of which existed at the time of the Judgment. (See, e.g., Alto & Centro PSY Update, Tab. 1; Wagner Decl., pp. 3–4.) In light of the uncertainties with the Watermaster's current PSY Update approach, the Watermaster should supplement its monitoring network and update its methods consistent with its obligations under the Judgment.

27

28

<sup>24</sup> 

<sup>25</sup> 

<sup>26</sup> 

<sup>&</sup>lt;sup>7</sup> In addition to the categories identified in the Alto & Centro PSY Update, Table 1 of the Watermaster Response acknowledges there are "ungaged" surface water inflows and outflows. <sup>8</sup> Judgment, Exh. G,  $\P$  1, 1(e).

Alto & Centro PSY Update, Tab. 1, fn. 10.

<sup>&</sup>lt;sup>10</sup> Alto & Centro PSY Update, Tab. 1, fn. 4.

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

GSWC understands that Watermaster Engineer intends to update a groundwater model to include the Centro Subarea and other Subareas for future PSY and FPA updates and further that Watermaster plans to implement groundwater modeling tools to improve the understanding of water supply, use and disposal for the Centro subarea. (Watermaster Response, p. 4; Motion, p. 8, see Judgment, ¶ 24(w) [requiring Watermaster to update its accounting and Exhibit C procedures with equal or more accurate procedures].) While GSWC appreciates these efforts, it is not clear whether these efforts are intended to address the discrepancies and uncertainties raised by this Opposition and, if so, what is the schedule for doing so.

## IV. CONCLUSION AND REQUESTED FURTHER COURT ORDER

For the reasons described in this Opposition, there continues to be uncertainty surrounding the hydrology of the Transition Zone and corresponding challenges with ensuring the Alto Subarea Obligation is satisfied annually. Accordingly, in accordance with Paragraph 24 of the Judgment, GSWC respectfully requests that the Court order Watermaster to undertake the following actions prior to setting the FPAs for each Subarea for 2025–26:

- 1. Replace the Wild Crossing stream gage, or establish a stream gage at or near the Helendale Fault to directly measure surface water inflows into the Centro Subarea;
- 2. Develop a detailed water budget for the Transition Zone, based on current scientific and engineering standards and the best available information, as recommended by and as more particularly described in the aquilogic Memorandum; and
- 3. Analyze the causes of drawdown in GSWC and other Producer wells within the Barstow area and continue to deliver and recharge imported water to the Centro Subarea for supply augmentation until water levels recover.

The above actions are necessary and appropriate to implement the Judgment based on the best available science and information and to halt continued groundwater level decline in the Centro Subarea.

26

27

28

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

1	Dated: May 21, 2024  BROWNSTEIN HYATT FARBER SCHRECK, LLP
2	By: Reduce
3	STEPHANIE OSLER HASTINGS
4	MACKENZIE W. CARLSON Attorneys for Plaintiff GOLDEN STATE WATER COMPANY
5	GOLDEN STATE WATER COMPANY
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	18
	GOLDEN STATE WATER COMPANY'S OPPOSITION TO MOJAVE WATER AGENCY'S MOTION TO ADJUST FREE

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

# 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 May 21, 2024, I served a copy of the following document(s):

> GOLDEN STATE WATER COMPANY'S OPPOSITION TO MOJAVE WATER AGENCY'S MOTION TO ADJUST FREE PRODUCTION ALLOWANCE FOR WATER YEAR 2024-2025

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

William J. Brunick, Esq. Leland P. McElhaney, Esq. Brunick, McElhaney & Kennedy, PLC P. O. Box 13130 San Bernardino, CA 92423-3130 Email: bbrunick@bmklawplc.com lmcelhaney@bmklawplc.com

Attorneys for Defendant/Cross-Complainant Mojave Water Agency

Valerie Wiegenstein Jeffrey D. Ruesch Watermaster Services Managers Mojave Basin Area Watermaster Mojave Water Agency 13846 Conference Center Drive Apple Valley, CA 92307 Email: vwiegenstein@MojaveWater.org jruesch@mojavewater.org

Mojave Basin Area Watermaster

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on May 21, 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 May 22, 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 OPPOSITION TO MOJAVE WATER AGENCY'S MOTION TO ADJUST FREE PRODUCTION ALLOWANCE FOR WATER YEAR 2024-2025

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 May 22, 2024 at Apple Valley, California.

Almst

Jeffrey D. Ruesch

Attn: Roberto Munoz 35250 Yermo, LLC 11273 Palms Blvd., Ste. D. Los Angeles, CA 90066-2122 Attn: John McCallum Abshire, David V. P. O. Box # 2059 Lucerne Valley, CA 92356-2059 Attn: Dwayne Oros Adelanto, City Of 11600 Air Expressway Adelanto, CA 92301-1914

(adesdevon@gmail.com)
Ades, John and Devon (via email)

Attn: Pedro Dumaua (pdumaua@ducommun.com) Aerochem, Inc. (via email) 4001 El Mirage Rd. Adelanto, CA 92301-9489 Attn: Lori Clifton (lclifton@robar.com) Agcon, Inc. (via email) 17671 Bear Valley Road

Hesperia, CA 92345-4902

Attn: Chun Soo and Wha Ja Ahn (chunsooahn@naver.com)

Ahn Revocable Living Trust (via email)

P. O. Box 45

Apple Valley, CA 92307-0001

Attn: Simon Ahn (ssahn58@gmail.com) Ahn Revocable Trust (via email)

29775 Hunter Road Murrieta, CA 92563-6710 Attn: Chun Soo Ahn (davidahnmd@gmail.com, chunsooahn@naver.com; davidahn0511@gmail.com)

Ahn, Chun Soo and David (via email)

P. O. Box 45

Apple Valley, CA 92307-0001

Attn: Chun Soo Ahn (chunsooahn@naver.com)

Ahn, Chun Soo and Wha Ja (via email)

P. O. Box 45

Apple Valley, CA 92307-0001

Ake, Charles J. and Marjorie M. 2301 Muriel Drive, Apt. 67 Barstow, CA 92311-6757 Attn: Paul Tsai (paul@ezzlife.com) America United Development, LLC (via

email)

19625 Shelyn Drive

Rowland Heights, CA 91748-3246

Attn: Ana Chavez

American States Water Company 160 Via Verde, Ste. 100 San Dimas, CA 91773-5121 Anderson, Ross C. and Betty J.

13853 Oakmont Dr. Victorville, CA 92395-4832 Attn: Daniel B. Smith (avfcwd@gmail.com)
Apple Valley Foothill County Water District

(via email)

22545 Del Oro Road

Apple Valley, CA 92308-8206

Attn: Matthew Patterson

Apple Valley Heights County Water District

P. O. Box 938

Apple Valley, CA 92308-0938

Attn: Matthew Schulenberg

Apple Valley Unified School District

12555 Navajo Road

Apple Valley, CA 92308-7256

Attn: Emely and Joe Saltmeris

Apple Valley View Mutual Water Company

P. O. Box 3680

1523 S. Visalia

Apple Valley, CA 92307-0072

Avila, Angel and Evalia

Compton, CA 90220-3946

Attn: Tina Kuhns Apple Valley, Town Of 14955 Dale Evans Parkway Apple Valley, CA 92307-3061 (ArchibekFarms@gmail.com; Sandi.Archibek@gmail.com) Archibek, Eric (via email) 41717 Silver Valley Road

Newberry Springs, CA 92365-9517

Silver Valley Road

Attn: Sheré R. Bailey

(LegalPeopleService@gmail.com)

Bailey 2007 Living Revocable Trust, Sheré R.

(via email)

10428 National Blvd

Los Angeles, CA 90034-4664

Attn: Daniel Shaw (barhwater@gmail.com) Bar H Mutual Water Company (via email)

P. O. Box 844

Lucerne Valley, CA 92356-0844

Barber, James B. 43774 Cottonwood Road Newberry Springs, CA 92365

Attn: John Munoz

(barlenwater@hotmail.com;)

Bar-Len Mutual Water Company (via email)

P. O. Box 77

Barstow, CA 92312-0077

Attn: Curtis Palmer

Baron, Susan and Palmer, Curtis

141 Road 2390

Aztec, NM 87410-9322

Attn: Jennifer Riley (hriley@barstowca.org)

Barstow, City of (via email)

220 East Mountain View Street -Suite A

Barstow, CA 92311

Attn: Barbara Davisson Bass Trust, Newton T. 14924 Chamber Lane

Apple Valley, CA 92307-4912

Beinschroth, Andy Eric 6719 Deep Creek Road Apple Valley, CA 92308-8711

Attn: Deborah Stephenson (stephenson@dmsnaturalresources.com; Jason.Murray@bnsf.com; Blaine.Bilderback@bnsf.com)

BNSF Railway Company (via email) 602 S. Ferguson Avenue, Suite 2

Bozeman, MT 59718-

Box, Geary S. and Laura P. O. Box 402564 Hesperia, CA 92340-2564

Brown, Jennifer 10001 Choiceana Ave. Hesperia, CA 92345

(bubierbear@msn.com) Bubier, Diane Gail (via email)

46263 Bedford Rd.

Newberry Springs, CA 92365-9819

(kjbco@yahoo.com) Bush, Kevin (via email) 7768 Sterling Ave.

San Bernardino, CA 92410-4741

Attn: Robert W. Bowcock CalMat Company 405 N. Indian Hill Blvd. Claremont. CA 91711-4614

Attn: Tony Camanga Camanga, Tony and Marietta 2309 Highland Heights Lane Carrollton, TX 75007-2033 Attn: Remo E. Bastianon Bastianon Revocable Trust 9484 Iroquois Rd.

Apple Valley, CA 92308-9151

Attn: Chuck Bell (Chuckb193@outlook.com; Chuckb193@outlook.com)

Bell, Charles H. Trust dated March 7, 2014

(via email) P. O. Box 193

Lucerne Valley, CA 92356-0193

Attn: Deborah Stephenson

(stephenson@dmsnaturalresources.com) BNSF Railway Company (via email) 602 S. Ferguson Avenue, Suite 2 Bozeman, MT 59718-6483

Attn: Marvin Brommer Brommer House Trust 9435 Strathmore Lane Riverside, CA 92509-0941

Bruneau, Karen 19575 Bear Valley Rd. Apple Valley, CA 92308-5104

Attn: Noah Furie Budget Finance Company PO BOX 641339 Los Angeles, CA 90064-6339

Attn: Robert Muratalla (Robert.Muratalla@associa.us) Calico Lakes Homeowners Association (via

email)

11860 Pierce Street, Suite 100 Riverside, CA 92505-5178

Attn: Catalina Fernandez-Moores (cfernadez@calportland.com) CalPortland Company - Agriculture (via

email)

P. O. Box 146

Oro Grande, CA 92368-0146

Attn: Myron Campbell II Campbell, M. A. and Dianne 19327 Cliveden Ave Carson, CA 90746-2716 Attn: Mike Beinschroth (Beinschroth@gmail.com)

Beinschroth Family Trust (via email)

18794 Sentenac Road

Apple Valley, CA 92307-5342

Best, Byron L. 21461 Camino Trebol Lake Forest, CA 92630-2011

Borja, Leonil T. and Tital L. 20784 Iris Canyon Road Riverside, CA 92508-

Attn: Valeria Brown

Brown Family Trust Dated August 11, 1999

26776 Vista Road

Helendale, CA 92342-9789

(irim@aol.com) Bryant, Ian (via email) 15434 Sequoia Avenue - Office Hesperia, CA 92345-1667

Bunnell, Dick 8589 Volga River Circle Fountain Valley, CA 92708-5536

Attn: William DeCoursey (michael.lemke@dot.ca.gov; William.Decoursey@dot.ca.gov)

California Department Of Transportation (via

email) 175 W. Cluster

San Bernardino, CA 92408-1310

Attn: Catalina Fernandez-Moores (cfernandez@calportland.com)

CalPortland Company - Oro Grande Plant (via

email)

P. O. Box 146

Oro Grande, CA 92368-0146

Carlton, Susan 445 Via Colusa Torrance, CA 90505-

Attn: Denise Parra Casa Colina Foundation P.O. Box 1760

Lucerne Valley, CA 92356

Attn: Paco Cabral (paco.cabral@wildlife.ca.gov; askregion6@wildlife.ca.gov; aaron.johnson@wildlife.ca.gov)

CDFW - Mojave River Fish Hatchery (via

email)

12550 Jacaranda Avenue Victorville, CA 92395-5183

Attn: Nancy Ryman

Chamisal Mutual Water Company

P. O. Box 1444

Adelanto, CA 92301-2779

(joan.chong7@gmail.com; joancksp@hotmail.com) Chong, Joan (via email) 10392 Shady Ridge Drive Santa Ana, CA 92705-7509

Clark, Arthur P. O. Box 4513

Blue Jay, CA 92317-4513

Contratto, Ersula 13504 Choco Road

Apple Valley, CA 92308-4550

Cross, Sharon I. P. O. Box 922

Lucerne Valley, CA 92356

(dacostadean@gmail.com) DaCosta, Dean Edward (via email)

32307 Foothill Road

Lucerne Valley, CA 92356-8526

Attn: James Kelly (James.Kelly@clearwayenergy.com) Daggett Solar Power 3 LLC (via email) 5780 Fleet Street, Suite 130 Carlsbad, CA 92008-4715 Attn: Danielle Stewart

(danielle.stewart@wildlife.ca.gov; Richard.Kim@wildlife.ca.gov; Alisa.Ellsworth@wildlife.ca.gov) CDFW - Camp Cady (via email)

4775 Bird Farm Road Chino Hills, CA 91709-3175

Attn: Alejandra Silva (alejandrav.silva@cemex.com) Cemex, Inc. (via email) 16888 North E. Street Victorville, CA 92394-2999

Attn: Carl Pugh (talk2betty@aol.com;

cpugh3@aol.com)

Cheyenne Lake, Inc. (via email) 44658 Valley Center Rd. Newberry Springs, CA 92365-

Christison, Joel P. O. Box 2635

Big River, CA 92242-2635

Attn: Manoucher Sarbaz Club View Partners

9903 Santa Monica Blvd., PMB #541 Beverly Hills, CA 90212-1671

Attn: George Starke Corbridge, Linda S. 8743 Vivero St

Rancho Cucamonga, CA 91730-

Attn: Jay Hooper (jayho123@gmail.com) Crown Cambria, LLC (via email)

9860 Gidley St.

El Monte, CA 91731-1110

Attn: Shanna Mitchell (daggettcsd@aol.com;

daggettcsd@outlook.com; daggettwater427@gmail.com)

Daggett Community Services District (via

email)

P. O. Box 308

Daggett, CA 92327-0308

(ron@dadcopowerandlights.com) Dahlquist, George R. (via email) 8535 Vine Valley Drive Sun Valley, CA 91352Attn: Jared Beyeler

CDFW - Mojave Narrows Regional Park 222 W. Hospitality Lane, 2nd Floor San Bernardino, CA 92415-0023

Attn: Jennifer Cutler Center Water Company

P. O. Box 616

Lucerne Valley, CA 92356-0616

Choi, Yong Il and Joung Ae 34424 Mountain View Road Hinkley, CA 92347-9412

Attn: Hwa-Yong Chung

Chung, et al. 11446 Midway Ave.

Lucerne Valley, CA 92356-8792

Conner, William H. 11535 Mint Canyon Rd. Agua Dulce, CA 91390-4577

Attn: Gwen Bartels Cross, Francis and Beverly 156 W 100 N

Jerome, ID 83338-5256

Attn: Alessia Morris

Crystal Lakes Property Owners Association

P. O. Box 351

Yermo, CA 92398-0351

Attn: Steve and Dana Rivett
Daggett Ranch, LLC
P. O. Box 112

Daggett, CA 92327-0112

Darr, James S. 40716 Highway 395 Boron, CA 93516

Attn: Alan L. De Jong De Jong Family Trust 46561 Fairview Road

Newberry Springs, CA 92365-9230

Attn: Penny Zaritsky

(pennyzaritsky2000@yahoo.com) Desert Girlz LLC (via email)

P. O. Box 709

Lucerne Valley, CA 92356-0709

Attn: Judith Dolch-Partridge, Trustee Dolch Living Trust Robert and Judith

4181 Kramer Lane

Bellingham, WA 98226-7145

Attn: David Dorrance

Dorrance, David W. and Tamela L.

118 River Road Circle Wimberley, TX 78676-5060

Evenson, Edwin H. and Joycelaine C.

P. O. Box 66

Oro Grande, CA 92368-0066

Fejfar, Monica Kay 34080 Ord Street

Newberry Springs, CA 92365-9791

(ropingmom3@yahoo.com) Finch, Jenifer (via email) 9797 Lewis Lane

Apple Valley, CA 92308-8357

Attn: Paul Johnson Fisher Trust, Jerome R. 7603 Hazeltine Ave Van Nuys, CA 91405-1423

Attn: Deborah A. Friend Friend, Joseph and Deborah

P. O. Box 253

Barstow, CA 92312-0253

Gabrych, Eugene 2006 Old Highway 395 Fallbrook, CA 92028-8816 Attn: Randy Wagner

Dennison, Quentin D. - Clegg, Frizell and Joke

44579 Temescal Street Newberry Springs, CA 92365

Attn: Denise Courtney

Desert Springs Mutual Water Company

P. O. Box 396

Lucerne Valley, CA 92356-0396

Donaldson, Jerry and Beverly

16736 B Road Delta, CO 81416-8501

Attn: David Looper Douglass, Tina P.O. Box 1730

Lucerne Valley, CA 92356-

Attn: Stephanie L. Evert (severt2166@aol.com)

Evert Family Trust (via email)

19201 Parker Circle Villa Park, CA 92861-1302

(afc30@yahoo.com) Fernandez, Arturo (via email)

28 Calle Fortuna

Rancho Santa Margarita, CA 92688-2627

Attn: Alex and Jerrica Liu (alexliu1950@gmail.com; alexroseanneliu@yahoo.com) First CPA LLC (via email) 46669 Valley Center Rd Newberry Springs, CA 92365-

Attn: Daisy Cruz Foothill Estates MHP, LLC 9454 Wilshire Blvd., Ste. 920

Beverly Hills, CA 90212-2925

Attn: Mark Asay (bettybrock@ironwood.org;

waltbrock@ironwood.org)

Fundamental Christian Endeavors, Inc. (via

email)

49191 Cherokee Road Newberry Springs, CA 92365

Attn: Mitch Hammack Gabrych, Eugene 34650 Minneola Rd Newberry Springs, CA 92365Attn: Marie McDaniel

Desert Dawn Mutual Water Company

P. O. Box 392

Lucerne Valley, CA 92356-0392

Attn: Debby Wyatt DLW Revocable Trust 13830 Choco Rd.

Apple Valley, CA 92307-5525

Attn: Jeffery Lidman Dora Land, Inc. P. O. Box 1405

Apple Valley, CA 92307-0026

Dowell, Leonard 345 E Carson St. Carson, CA 90745-2709

Attn: David Dittenmore

(d2dittemore@bop.gov; rslayman@bop.gov) Federal Bureau of Prisons, Victorville (via

email)

P. O. Box 5400

Adelanto, CA 92301-5400

Ferro, Dennis and Norma 1311 1st Ave. N

Jacksonville Beach, FL 32250-3512

Attn: Mike Fischer (carlsfischer@hotmail.com; fischer@fischercompanies.com)

Fischer Revocable Living Trust (via email)

1372 West 26th St.

San Bernardino, CA 92405-3029

(cfrates@renewablegroup.com) Frates, D. Cole (via email) 113 S La Brea Ave., 3rd Floor Los Angeles, CA 90036-2998

Gabrych, Eugene 2006 Old Highway 395 Fallbrook, CA 92028

Gaeta, Miguel and Maria 9366 Joshua Avenue

Lucerne Valley, CA 92356-8273

Attn: Jay Storer Gaeta, Trinidad 10551 Dallas Avenue Lucerne Valley, CA 92356 Garcia, Daniel 223 Rabbit Trail

Lake Jackson, TX 77566-3728

Attn: Sang Hwal Kim Gardena Mission Church, Inc.

P. O. Box 304

Lucerne Valley, CA 92356-0304

Garg, Om P. 358 Chorus

Irvine, CA 92618-1414

Gayjikian, Samuel and Hazel 34534 Granite Road Lucerne Valley, CA 92356-

Attn: Brent Peterson

Attn: Jeffrey Edwards (jedwards@fbremediation.com) GenOn California South, LP (via email) P. O. Box 337

Daggett, CA 92327-0337

Attn: Nereida Gonzalez (ana.chavez@gswater.com, Nereida.Gonzalez@gswater.com) Golden State Water Company (via email)

160 Via Verde, Ste. 100 San Dimas, CA 91773-5121 Attn: Scot Gasper Gordon Acres Water Company P. O. Box 1035

Gray, George F. and Betty E. 975 Bryant Calimesa, CA 92320-1301

Lucerne Valley, CA 92356-1035

Attn: Brian E. Bolin Green Acres Estates P. O. Box 29

Apple Valley, CA 92307-0001

Attn: Eric Archibek Green Hay Packers LLC 41717 Silver Valley Road Newberry Springs, CA 92365-9517 Attn: Nick Grill (terawatt@juno.com) Grill, Nicholas P. and Millie D. (via email) 35350 Mountain View Rd Hinkley, CA 92347-9613

Gubler, Hans P. O. Box 3100 Landers, CA 92285 Attn: Tamara J Skoglund (TamaraMcKenzie@aol.com) Gulbranson, Merlin (via email) 511 Minnesota Ave W Gilbert, MN 55741Gutierrez, Jose and Gloria 24116 Santa Fe Hinkley, CA 92347

Attn: Bryan C. Haas and Mary H. Hinkle (resrvc4you@aol.com)

Haas, Bryan C. and Hinkle, Mary H. (via

email)

14730 Tigertail Road Apple Valley, CA 92307-5249

(hackbarthoffice@gmail.com) Hackbarth, Edward E. (via email) 12221 Poplar Street, Unit #3 Hesperia, CA, CA 92344-9287

Attn: Doug and Cheryl Hamilton Hamilton Family Trust 19945 Round Up Way Apple Valley, CA 92308-8338

Attn: William Handrinos Handrinos, Nicole A. 1140 Parkdale Rd.

Hang, Phu Quang 645 S. Shasta Street West Covina, CA 91791-2818 Attn: Donald F. Hanify Hanify, Michael D., dba - White Bear Ranch

PO BOX 1021 Yermo, CA 92398-1021

Adelanto, CA 92301-9308

Attn: Matt Wood (Matthew.wood@martinmarietta.com) Hanson Aggregates WRP, Inc. (via email)

P. O. Box 1115 Corona, CA 92878-1115 Attn: Mary Jane Hareson Hareson, Nicholas and Mary 1737 Anza Avenue Vista, CA 92084-3236

Attn: Kenny Harmsen (harmsencow@aol.com) Harmsen Family Trust (via email)

23920 Community Blvd. Hinkley, CA 92347-9721

Harter, Joe and Sue 10902 Swan Lake Road Klamath Falls, OR 97603-9676

(harveyl.92356@gmail.com) Harvey, Lisa M. (via email) P. O. Box 1187

Lucerne Valley, CA 92356-

Haskins, James J. 11352 Hesperia Road, #2 Hesperia, CA 92345-2165

Hass, Pauline L. P. O. Box 273

Newberry Springs, CA 92365-

Attn: Craig Carlson (kcox@helendalecsd.org; ccarlson@helendalecsd.org)

Helendale Community Services District (via

email)

P. O. Box 359

Helendale, CA 92342-0359

Attn: Joshua Maze Helendale School District P. O. Box 249

Helendale, CA 92342-0249

Attn: Jeff Gallistel Hendley, Rick and Barbara P. O. Box 972

Yermo, CA 92398-0972

Hensley, Mark P. 35523 Mountain View Rd Hinkley, CA 92347-9613 Attn: Jeremy McDonald (jmcdonald@cityofhesperia.us)

Hesperia - Golf Course, City of (via email)

9700 Seventh Avenue Hesperia, CA 92345-3493

Attn: Janie Martines (janiemartines@gmail.com) Hesperia Venture I, LLC (via email)

10 Western Road

Wheatland, WY 82201-8936

Attn: Jeremy McDonald (jmcdonald@cityofhesperia.us) Hesperia Water District (via email)

9700 7th Avenue

Hesperia, CA 92345-3493

Attn: Jeremy McDonald (tsouza@cityofhesperia.us) Hesperia, City of (via email) 9700 Seventh Avenue Hesperia, CA 92345-3493

Attn: Carabeth Carter ()

Hettinga Revocable Trust (via email)

P. O. Box 455

Ehrenberg, AZ 84334-0455

Attn: Lisset Sardeson

Hi Desert Mutual Water Company

23667 Gazana Street Barstow, CA 92311 (leehiett@hotmail.com) Hiett, Harry L. (via email)

P. O. Box 272

Daggett, CA 92327-0272

Attn: Robert W. Bowcock High Desert Associates, Inc. 405 North Indian Hill Blvd. Claremont, CA 91711-4614 Attn: Lori Clifton (lclifton@robar.com) Hi-Grade Materials Company (via email)

17671 Bear Valley Road Hesperia, CA 92345-4902 Attn: Lori Clifton (lclifton@robar.com) Hi-Grade Materials Company (via email)

17671 Bear Valley Rd Hesperia, CA 92345-4902

Attn: Frank Hilarides

Hilarides 1998 Revocable Family Trust

37404 Harvard Road

Newberry Springs, CA 92365

Attn: Katherine Hill (Khill9@comcast.net) Hill Family Trust and Hill's Ranch, Inc. (via

email)

84 Dewey Street Ashland, OR 97520Attn: Anne Roark Hitchin Lucerne, Inc. P. O. Box 749

Lucerne Valley, CA 92356-0749

Ho, Ting-Seng and Ah-Git

P.O. Box 20001

Bakersfield, CA 93390-0001

Attn: Joan Rohrer

Hollister, Robert H. and Ruth M.

22832 Buendia

Mission Viejo, CA 92691-

Attn: Jeffrey R Holway and Patricia Gage

(patricia.gage@yahoo.com)

Holway Jeffrey R and Patricia Gage (via

email)

1401 Wewatta St. #1105 Denver, CO 80202-1348

Holway, Jeffrey R 1401 Wewatta St. #1105 Denver, CO 80202-1348 Attn: Katherine K. Hsu Holy Heavenly Lake, LLC 1261 S. Lincoln Ave.

Monterey Park, CA 91755-5017

Attn: Paul Hong Hong, Paul B. and May P. O. Box #1432 Covina, CA 91722-0432

Attn: Sandra D. Hood Hood Family Trust 2142 W Paseo Del Mar San Pedro, CA 90732-4557 Attn: Barry Horton Horton Family Trust 47716 Fairview Road

Newberry Springs, CA 92365-9258

(dell2342008@gmail.com) Hu, Minsheng (via email) 33979 Fremont Road

Newberry Springs, CA 92365-9136

Attn: Ester Hubbard

Hubbard, Ester and Mizuno, Arlean

47722 Kiloran St.

Newberry Springs, CA 92365-9529

Attn: Paul Johnson Huerta, Hector 25684 Community Blvd Barstow, CA 92311(hconnie630@gmail.com) Hunt, Connie (via email) 39392 Burnside Loop Astoria, OR 97103-8248

Attn: Ralph Hunt

Hunt, Ralph M. and Lillian F.

P. O. Box 603

Yermo, CA 92398-0603

Attn: Daniel and Karen Gray (calivolunteer@verizon.net) Hyatt, James and Brenda (via email)

31726 Fremont Road

Newberry Springs, CA 92365

(econorx@yahoo.com)

Im, Nicholas Nak-Kyun (via email)

23329 Almarosa Ave. Torrance, CA 90505-3121

Irvin, Bertrand W. 3224 West 111th Street Inglewood, CA 90303Attn: James Jackson Jr.
Jackson, James N. Jr Revocable Living Trust
1245 S. Arlington Avenue
Los Angeles, CA 90019-3517

Attn: Lawrence Dean Jackson, Ray Revocable Trust No. 45801 P.O. Box 8250 Redlands, CA 92375-1450

Attn: Audrey Goller

(audrey.goller@newportpacific.com)
Jamboree Housing Corporation (via email)
15940 Stoddard Wells Rd - Office
Victorville, CA 92395-2800

Attn: Gary A. Ledford (gleddream@gmail.com)

Jess Ranch Water Company (via email)

906 Old Ranch Road Florissant, CO 80816Johnson, Carlean 8626 Deep Creek Road Apple Valley, CA 92308

Attn: Paul Johnson

(johnsonfarming@gmail.com) Johnson, Paul - Industrial (via email)

10456 Deep Creek Road Apple Valley, CA 92308-8330 Johnson, Ronald 1156 Clovis Circle

Dammeron Valley, UT 84783-5211

Attn: Lawrence W. Johnston
Johnston, Harriet and Johnston, Lawrence W.

P. O. Box 401472

Hesperia, CA 92340-1472

Attn: Magdalena Jones (mygoldenbiz9@gmail.com)

Jones Trust dated March 16, 2002 (via email)

35424 Old Woman Springs Road Lucerne Valley, CA 92356-7237 Jones, Joette 81352 Fuchsia Ave. Indio, CA 92201-5329 Attn: Paul Jordan Jordan Family Trust 1650 Silver Saddle Drive Barstow, CA 92311-2057

Attn: Ray Gagné

Jubilee Mutual Water Company

P. O. Box 1016

Lucerne Valley, CA 92356

Attn: Lee Logsdon

Juniper Riviera County Water District

P. O. Box 618

Lucerne Valley, CA 92356-0618

Attn: Ash Karimi Karimi, Hooshang 1254 Holmby Ave Los Angeles, CA 90024-

Attn: Robert R. Kasner (Robertkasner@aol.com)

Kasner Family Limited Partnership (via email)

11584 East End Avenue Chino, CA 91710(Robertkasner@aol.com) Kasner, Robert (via email) 11584 East End Avenue Chino, CA 91710-1555 Attn: Martin A and Mercedes Katcher Katcher, August M. and Marceline 12928 Hyperion Lane

Apple Valley, CA 92308-4565

Kemp, Robert and Rose 48441 National Trails Highway Newberry Springs, CA 92365 Attn: Peggy Shaughnessy Kemper Campbell Ranch

 $10~{\rm Kemper}$  Campbell Ranch Road - Office

Victorville, CA 92395-3357

Kim, Jin S. and Hyun H. 6205 E Garnet Circle Anaheim, CA 92807-4857

Attn: Alan and Annette De Jong

Kim, Joon Ho and Mal Boon Revocable Trust

46561 Fairview Road

Newberry Springs, CA 92365-9230

(juskim67@yahoo.com) Kim, Ju Sang (via email) 1225 Crestview Dr Fullerton, CA 92833-2206 Kim, Seon Ja 34981 Piute Road Newberry Springs, CA 92365-9548

Attn: Richard Koering

Koering, Richard and Koering, Donna 40909 Mountain View Road

Newberry Springs, CA 92365-9414

Attn: Catherine Cerri
(ccerri@lakearrowheadcsd.com)
Lake Arrowhead Community Servi

Lake Arrowhead Community Services District (via email)

(via email) P. O. Box 700

Lake Arrowhead, CA 92352-0700

Attn: Claire Cabrey (HandleWithClaire@aol.com; mjaynes@mac.com)

Lake Jodie Property Owners Association (via

email)

8581 Santa Monica Blvd., #18 West Hollywood, CA 90069-4120

Attn: Nancy Lan Lake Waikiki 230 Hillcrest Drive La Puente, CA 91744-4816

Attn: c/o J.C. UPMC, Inc. Lori Rodgers (ljm9252@aol.com;

timrohmbuilding@gmail.com)

Lake Wainani Owners Association (via email)

2812 Walnut Avenue, Suite A Tustin, CA 92780-7053 (PhillipLam99@Yahoo.com) Lam, Phillip (via email) 864 Sapphire Court Pomona, CA 91766-5171 (jlangley@kurschgroup.com) Langley, James (via email) 12277 Apple Valley Road, Ste. #120 Apple Valley, CA 92308-1701

Attn: Vanessa Laosy Lavanh, et al. 18203 Yucca St. Hesperia, CA 92345Attn: Robert Lawrence Jr. Lawrence, William W. P. O. Box 98

Newberry Springs, CA 92365

Lawson, Ernest and Barbara 20277 Rock Springs Road Apple Valley, CA 92308-8740

Attn: Anna K. Lee (aklee219@gmail.com) Lee, Anna K. and Eshban K. (via email)

10979 Satsuma St

Loma Linda, CA 92354-6113

Lee, Doo Hwan P. O. Box 556

Lucerne Valley, CA 92356-0556

Attn: Sepoong & Woo Poong Lee Lee, et al., Sepoong and Woo Poong #6 Ensueno East

Irvine, CA 92620-

Lee, Vin Jang T. 42727 Holcomb Trl

Newberry Springs, CA 92365

Attn: Virginia Janovsky (virginiajanovsky@yahoo.com)

Lem, Hoy (via email) 17241 Bullock St. Encino, CA 91316-1473 Lenhert, Ronald and Toni 4474 W. Cheyenne Drive Eloy, AZ 85131-3410

Attn: Brad Francke LHC Alligator, LLC P. O. Box 670

Upland, CA 91785-0670

Attn: Billy Liang

Liang, Yuan - I and Tzu - Mei Chen

4192 Biscayne St Chino, CA 91710-3196 Attn: Eric Larsen

(eric.larsen@libertyutilities.com; tony.pena@libertyutilities.com) Liberty Utilities (Apple Valley Ranchos

Water) Corp. (via email)

P. O. Box 7005

Apple Valley, CA 92307

Attn: James Lin

Lin, Kuan Jung and Chung, Der-Bing

2026 Turnball Canyon Hacienda Heights, CA 91745Attn: Manshan Gan

5535 N Muscatel Ave San Gabriel, CA 91776-1724 Attn: Neal Davies (ndavies@terra-gen.com;

dkelly@terra-gen.com)

Lockhart Land Holding, LLC (via email)

43880 Harper Lake Road Hinkley, CA 92347-

Attn: Patricia Miranda Lopez, Baltazar 12318 Post Office Rd Lucerne Valley, CA 92356(lowgo.dean@gmail.com) Low, Dean (via email) 3 Panther Creek Ct. Henderson, NV 89052Lua, Michael T. and Donna S. 18838 Aldridge Place Rowland Heights, CA 91748-4890

Attn: Gwen L. Bedics

Lucerne Valley Mutual Water Company

P. O. Box 1311

Lucerne Valley, CA 92356

Attn: Manoucher Sarbaz Lucerne Valley Partners

9903 Santa Monica Blvd., PMB #541 Beverly Hills, CA 90212-1671 Attn: Marian Walent (LVVMC677@gmail.com)

Lucerne Vista Mutual Water Company (via

email)
P. O. Box 677

Lucerne Valley, CA 92356-0677

Attn: Eugene R. & Vickie R. Bird

M Bird Construction 1613 State Street, Ste. 10 Barstow, CA 92311-4162 Attn: Maria Martinez

M.B. Landscaping and Nursery, Inc.

6831 Lime Avenue

Long Beach, CA 90805-1423

Attn: Robert Saidi Mahjoubi, Afsar S. 46622 Fairview Road Newberry Springs, CA 92365

Attn: Jimmy Berry Manning, Sharon S. 19332 Balan Road

Rowland Heights, CA 91748-4017

Marshall, Charles 32455 Lakeview Road

Newberry Springs, CA 92365-9482

McKinney, Paula 144 East 72nd

Tacoma, WA 98404-1060

Attn: Donna Miller Miller Living Trust 6124 Parsonage Circle Milton, FL 32570-8930

Attn: Philip Mizrahie Mizrahie, et al. 4105 W. Jefferson Blvd. Los Angeles, CA 90048-

Attn: Mahnas Ghamati (mahnaz.ghamati@atlantica.com) Mojave Solar, LLC (via email) 42134 Harper Lake Road Hinkley, CA 92347-9305

Attn: Ken Elliot (Billie@ElliotsPlace.com) Morris Trust, Julia V. (via email) 7649 Cypress Dr.

Lanexa, VA 23089-9320

Attn: Dennis Hills Mulligan, Robert and Inez 35575 Jakobi Street Saint Helens, OR 97051-1194

Attn: James Hansen (gm@marianaranchoscwd.org) Navajo Mutual Water Company (via email)

21724 Hercules St.

Apple Valley, CA 92308-8490

Attn: Jeff Gaastra (jeffgaastra@gmail.com) Newberry Springs Recreational Lakes Association (via email) 32935 Dune Road, Space 10 Newberry Springs, CA 92365Attn: Allen Marcroft Marcroft, James A. and Joan

P. O. Box 519

Newberry Springs, CA 92365

Martin, Michael D. and Arlene D. 32942 Paseo Mira Flores San Juan Capistrano, CA 92675

Attn: Olivia L. Mead Mead Family Trust 31314 Clay River Road Barstow, CA 92311-2057

Attn: Freddy Garmo (freddy@garmolaw.com)

Minn15 LLC (via email)

5464 Grossmont Center Drive, #300

La Mesa, CA 91942-3035

Attn: Thomas A. Hrubik (tahgolf@aol.com)

MLH, LLC (via email) P. O. Box 2611

Apple Valley, CA 92307-0049

Attn: Doug Kerns

(tmccarthy@mojavewater.org) Mojave Water Agency (via email) 13846 Conference Center Drive Apple Valley, CA 92307-4377

Moss, Lawrence W. and Helen J. 38338 Old Woman Springs Road Spc# 56 Lucerne Valley, CA 92356-8116

Murphy, Jean

46126 Old National Trails Highway Newberry Springs, CA 92365-9025

Attn: Billy Liang (flossdaily@hotmail.com; asaliking@yahoo.com)

New Springs Limited Partnership (via email)

4192 Biscayne St. Chino, CA 91710-3196

Attn: Mary Ann Norris Norris Trust, Mary Ann 29611 Exeter Street Lucerne Valley, CA 92356-8261 Attn: James M. Hansen, Jr. (gm@mrcwd.org;

gmmrcwd@gmail.com)

Mariana Ranchos County Water District (via

9600 Manzanita Street Apple Valley, CA 92308-8605

Attn: Rod Sexton McCollum, Charles L. 15074 Spruce St

Hesperia, CA 92345-2950

Attn: David I. Milbrat Milbrat, Irving H. P. O. Box 487

Newberry Springs, CA 92365-0487

Attn: David Riddle

(driddle@mitsubishicement.com)

Mitsubishi Cement Corporation (via email)

5808 State Highway 18

Lucerne Valley, CA 92356-8179

Attn: Sarah Bliss Mojave Desert Land Trust 60124 29 Palms Highway Joshua Tree, CA 92252-4130

Attn: Manoucher Sarbaz Monaco Investment Company 9903 Santa Monica Blvd., PMB #541 Beverly Hills, CA 90212-1671

Attn: Bradford Ray Most Most Family Trust 39 Sundance Circle Durango, CO 81303-8131

(z.music5909@gmail.com; zajomusic@gmail.com) Music, Zajo (via email) 43830 Cottonwood Rd

Newberry Springs, CA 92365-8510

Attn: Jodi Howard

Newberry Community Services District

P. O. Box 220

Newberry Springs, CA 92365-0220

Attn: Kenton Eatherton (keatherton@verizon.net) NSSLC, Inc. (via email) 9876 Moon River Circle

Fountain Valley, CA 92708-7312

Nuñez, Luis Segundo 9154 Golden Seal Court Hesperia, CA 92345-0197

Nunn Family Trust P. O. Box 545

Attn: Pearl or Gail Nunn

Apple Valley, CA 92307-0010

Attn: Jeff Gaastra (jeffgaastra@gmail.com; andy@seesmachine.com;

bbswift4044@cox.net)
O. F. D. L., Inc. (via email)
32935 Dune Road, #10

Newberry Springs, CA 92365-9175

Attn: Chun Soo Ahn (chunsooahn@naver.com) Oasis World Mission (via email)

P. O. Box 45

Apple Valley, CA 92307-0001

Attn: Kody Tompkins (ktompkins@barstowca.org) Odessa Water District (via email) 220 E. Mountain View Street, Suite A

Ohai, Reynolds and Dorothy 13450 Monte Vista Chino, CA 91710-5149

Attn: Dorothy Ohai

Attn: Craig Maetzold (craig.maetzold@omya.com) Omya California, Inc. (via email) 7225 Crystal Creek Rd

Lucerne Valley, CA 92356-8646

Attn: John P. Oostdam

Barstow, CA 92311-2888

Oostdam Family Trust, John P. and Margie K.

24953 Three Springs Road Hemet, CA 92545-2246 Attn: Nick Higgs Oro Grande School District P. O. Box 386

Oro Grande, CA 92368-0386

Attn: Taghi Shoraka

P and H Engineering and Development

Corporation

1423 South Beverly Glen Blvd. Apt. A

Los Angeles, CA 90024-6171

Attn: Jessica Bails (J4Dx@pge.com)
Pacific Gas and Electric Company (via email)

22999 Community Blvd. Hinkley, CA 92347-9592 Pak, Kae Soo and Myong Hui Kang

P. O. Box 1835

Lucerne Valley, CA 92356-1835

Patino, José 3914 W. 105th Street

Inglewood, CA 90303-1815

(wndrvr@aol.com)

Paustell, Joan Beinschroth (via email)

10275 Mockingbird Ave. Apple Valley, CA 92308-8303 Pearce, Craig L. 127 Columbus Dr

Punxsutawney, PA 15767-1270

Perko, Bert K. P. O. Box 762

Yermo, CA 92398-0762

Pettigrew, Dan 285 N Old Hill Road Fallbrook, CA 92028-2571 Attn: Sean Wright (swright@pphcsd.org; dbartz@pphcsd.org; llowrance@pphcsd.org) Phelan Piñon Hills Community Services

District (via email) 4176 Warbler Road Phelan, CA 92371-8819

Attn: John Poland

Poland, John R. and Kathleen A. 5511 Tenderfoot Drive Fontana, CA 92336-1156 Polich, Donna 75 3rd Avenue #4

Chula Vista, CA 91910-1714

Porter, Timothy M. 34673 Little Dirt Road

Newberry Springs, CA 92365-9646

Attn: Carin McKay

Precision Investments Services, LLC

791 Price Street, #160

Pismo Beach, CA 93449-2529

Price, Donald and Ruth 933 E. Virginia Way Barstow, CA 92311-4027 Pruett, Andrea P. O. Box 37

Newberry Springs, CA 92365

 $(s\_quakenbush@yahoo.com) \\$ 

Quakenbush, Samuel R. (via email)

236 Iris Drive

Martinsburg, WV 25404-1338

Attn: Ron Herrmann

Quiros, Fransisco J. and Herrmann, Ronald

35969 Newberry Rd

Newberry Springs, CA 92365-9438

Attn: Elizabeth Murena

(waterboy7F8@msn.com; etminav@aol.com) Rancheritos Mutual Water Company (via

email)

P. O. Box 348

Apple Valley, CA 92307

Reed, Mike

9864 Donaldson Road Lucerne Valley, CA 92356-8105 Attn: Brian C. Vail (bvail@river-west.com) Reido Farms, LLC (via email)

2410 Fair Oaks Blvd., Suite 110 Sacramento, CA 95825-7666

(LucerneJujubeFarm@hotmail.com) Rhee, Andrew N. (via email) 11717 Fairlane Rd, #989 Lucerne Valley, CA 92356-8829

Attn: Kelly Rice Rice, Henry C. and Diana 31823 Fort Cady Rd.

Newberry Springs, CA 92365-

Rivero, Fidel V. 612 Wellesley Drive Corona, CA 92879-0825

Attn: Susan Sommers (sommerssqz@aol.com)
Rossi Family Trust, James Lawrence Rossi
and Naomi (via email)
P. O. Box 120
Templeton, CA 93465-0120

Attn: Dale W. Ruisch Ruisch Trust, Dale W. and Nellie H. 10807 Green Valley Road Apple Valley, CA 92308-3690

Attn: Sara Fortuna (sarajfortuna@gmail.com; fourteengkids@aol.com)
Saba Family Trust dated July 24, 2018 (via email)
212 Avenida Barcelona
San Clemente, CA 92672-5468

San Bernardino Co Barstow - Daggett Airport 268 W. Hospitality Lane, Suite 302 San Bernardino, CA 92415-0831

Attn: Jared Beyeler (ssamaras@sdd.sbcounty.gov; jbeyeler@sdd.sbcounty.gov; waterquality@sdd.sbcounty.gov) San Bernardino County Service Area 42 (via email) 222 W. Hospitality Lane, 2nd Floor

Attn: Michelle Scray (mcscray@gmail.com)
Scray, Michelle A. Trust (via email)
16869 State Highway 173

16869 State Highway 173 Hesperia, CA 92345-9381

San Bernardino, CA 92415-0450

Sheng, Jen 5349 S Sir Richard Dr Las Vegas, NV 89110-0100 Attn: Ian Bryant Rim Properties, A General Partnership 15434 Sequoia Road

15434 Sequoia Road Hesperia, CA 92345-1667

(RayRizvi@Yahoo.com) Rizvi, S.R Ali (via email) 4054 Allyson Terrace Freemont, CA 94538-4186

Attn: Robert Vega Royal Way 2632 Wilshire Blvd., #480 Santa Monica, CA 90403-4623

Attn: Sherwin Shoraka S and B Brothers, LLC 1423 S. Beverly Glen Blvd., Ste. A Los Angeles, CA 90024-6171

Attn: Kanoe Barker (kanoebarker@yahoo.com) Sagabean-Barker, Kanoeolokelani L. (via email) 42224 Valley Center Rd Newberry Springs, CA 92365

Attn: Jared Beyeler (waterquality@sdd.sbcounty.gov) San Bernardino County - High Desert Detention Center (via email) 222 W. Hospitality Lane, 2nd Floor - SDW

San Bernardino, CA 92415-0415

Attn: Jared Beyeler (ssamaras@sdd.sbcounty.gov; jbeyeler@sdd.sbcounty.gov; waterquality@sdd.sbcounty.gov) San Bernardino County Service Area 64 (via

email)
222 W. Hospitality Lane, 2nd Floor - SDW

San Bernardino, CA 92415-0450

Attn: Rod Sexton

Sexton, Rodney A. and Sexton, Derek R.

P.O. Box 155

Rim Forest, CA 92378-

(gloriasheppard14@gmail.com) Sheppard, Thomas and Gloria (via email) 33571 Fremont Road

Newberry Springs, CA 92365-9520

Attn: Josie Rios Rios, Mariano V. P. O. Box 1864

Barstow, CA 92312-1864

Attn: Bill Taylor or Property Mngr

(billt@rrmca.com)

Robertson's Ready Mix (via email) 200 S. Main Street, Suite 200 Corona, CA 92882-2212

Attn: Sam Marich Rue Ranch, Inc. P. O. Box 133109

Big Bear Lake, CA 92315-8915

Attn: Jafar Rashid

(jr123realestate@gmail.com)

S and E 786 Enterprises, LLC (via email)

3300 S. La Cienega Blvd. Los Angeles, CA 90016-3115

(BILLU711@Yahoo.com) Samra, Jagtar S. (via email) 10415 Edgebrook Way Northridge, CA 91326-3952

Attn: Trevor Leja

(trevor.leja@sdd.sbcounty.gov)

San Bernardino County Service Area 29 (via

email)

222 W. Hospitality Lane, 2nd Floor (Spec San Bernardino, CA 92415-0450

Attn: Jared Beyeler (ssamaras@sdd.sbcounty.gov; jbeyeler@sdd.sbcounty.gov; waterquality@sdd.sbcounty.gov)

San Bernardino County Service Area 70J (via

email)

222 W. Hospitality Lane, 2nd Floor - SDW San Bernardino, CA 92415-0450

Attn: Joseph Tapia

Sheep Creek Water Company

P. O. Box 291820 Phelan, CA 92329-1820

Short, Jerome E. P. O. Box 1104 Barstow, CA 92312-1104

Attn: Francisco Ibarra (maint@silverlakesassociation.com; fibarra@silverlakesassociation.com) Silver Lakes Association (via email)

P. O. Box 179

Helendale, CA 92342-0179

Attn: Nepal Singh (NepalSingh@yahoo.com)

Singh, et al. (via email) 4972 Yearling Avenue Irvine, CA 92604-2956 Attn: Denise Smith

Smith, Denise dba Amerequine Beauty, Inc

P. O. Box 188

Newberry Springs, CA 92365-0188

Smith, Porter and Anita 8443 Torrell Way

San Diego, CA 92126-1254

Attn: Steve Kim (stevekim1026@gmail.com) Snowball Development, Inc. (via email)

P. O. Box 2926

Victorville, CA 92393-2926

Attn: Chan Kyun Son Son's Ranch P. O. Box 1767

Lucerne Valley, CA 92356

Attn: Erika Clement

(Shannon.Oldenburg@SCE.com; erika.clement@sce.com)

Southern California Edison Company (via

email)

2 Innovation Way, 2nd Floor Pomona, CA 91768-2560 Attn: Maria de Lara Cruz

(maria.delaracruz@mineralstech.com) Specialty Minerals, Inc. (via email)

P. O. Box 558

Lucerne Valley, CA 92356-0558

Sperry, Wesley P. O. Box 303

Newberry Springs, CA 92365-0303

Spillman, James R. and Nancy J.

12132 Wilshire

Lucerne Valley, CA 92356-8834

Attn: Eric Miller (emiller@svla.com;

alogan@svla.com;)

Spring Valley Lake Association (via email)

SVL Box 7001

Victorville, CA 92395-5107

Attn: Joe Trombino

Spring Valley Lake Country Club

7070 SVL Box

Victorville, CA 92395-5152

Attn: Father Sarapamon

St. Antony Coptic Orthodox Monastery

P. O. Box 100

Barstow, CA 92311-0100

(chiefgs@verizon.net)

Starke, George A. and Jayne E. (via email)

8743 Vivero Street

Rancho Cucamonga, CA 91730-1152

Storm, Randall 51432 130th Street Byars, OK 74831-7357

Sudmeier, Glenn W. 14253 Highway 138

Hesperia, CA 92345-9422

Attn: Alexandra Lioanag (sandra@halannagroup.com)

Summit Valley Ranch, LLC (via email) 220 Montgomery Street, Suite PH-10 San Francisco, CA 94104-3433 Attn: Alex Vienna Sundown Lakes, Inc. P. O. Box 364

Newberry Springs, CA 92365-0364

Attn: Stephen H. Douglas (sdouglas@centaurusenergy.com; mdoublesin@centcap.net; cre.notices@clenera.com)

Sunray Land Company, LLC (via email) 1717 West Loop South, Suite 1800

Houston, TX 77027-3049

Attn: Venny Vasquez (Ibaroldi@synagro.com) Synagro-WWT, Inc. (dba Nursury Products, LLC) (via email)

P. O. Box 1439 Helendale, CA 92342Attn: Russell Szynkowski Szynkowski, Ruth J. 46750 Riverside Rd.

Newberry Springs, CA 92365-9738

Attn: Bill and Elizabeth Tallakson (billtallakson@sbcglobal.net)

Tallakson Family Revocable Trust (via email)

11100 Alto Drive

Oak View, CA 93022-9535

Tapie, Raymond L. 73270 Desert Greens Dr N Palm Desert, CA 92260-1206 (jerryteisan@gmail.com) Teisan, Jerry (via email) P. O. Box 2089

Befair, WA 98528-2089

Attn: Daryl or Lucinda Lazenby

Thayer, Sharon P. O. Box 845

Luceren Valley, CA 92356-

Attn: Stephen Thomas Thomas, Stephen and Lori 4890 Topanga Canyon Bl. Woodland Hills, CA 91364-4229 Attn: Lynnette L. Thompson

Thompson Living Trust, James A. and Sula B.

22815 Del Oro Road Apple Valley, CA 92308

Attn: Rodger Thompson Thompson Living Trust, R.L. and R.A. 9141 Deep Creek Road Apple Valley, CA 92308-8351

Thrasher, Gary 14024 Sunflower Lane Oro Grande, CA 92368-9617

Attn: Doug Heinrichs Thunderbird County Water District P. O. Box 1105 Apple Valley, CA 92307-1105

Attn: Jim Hoover Triple H Partnership 35870 Fir Ave Yucaipa, CA 92399-9635 Attn: Mike Troeger (mjtroeger@yahoo.com) Troeger Family Trust, Richard H. (via email) P. O. Box 24

726 Arthur Lane

Wrightwood, CA 92397

Santa Maria, CA, CA 93455-7403

Attn: Aurelio Ibarra (aibarra@up.com; powen@up.com)

Union Pacific Railroad Company (via email)

HC1 Box 33 Kelso, CA 92309-

(druppal@aicdent.com) Uppal, Gagan (via email) 220 S Owens Drive Anaheim, CA 92808-1327

(gagevaage23@gmail.com) Vaage, Gage V. (via email) 47150 Black Butte Road Newberry Springs, CA 92365-9698

Attn: Glen and Jennifer Van Dam

Vaca, Andy and Teresita S. 5550 Avenue Juan Bautista Riverside, CA 92509-5613

Attn: Dean Van Bastelaar Van Bastelaar, Alphonse 45475 Martin Road

(gvandam@verizon.net) Van Dam Family Trust, Glen and Jennifer

(via email)

Turner, Terry

Newberry Springs, CA 92365-9625

3190 Cottonwood Avenue San Jacinto, CA 92582-4741

Attn: Jacob Bootsma Van Leeuwen Trust, John A. and Ietie

44128 Silver Valley Road Newberry Springs, CA 92365-9588 Attn: John Driscoll Vernola Trust, Pat and Mary Ann

P. O. Box 2190

Temecula, CA 92593-2190

Attn: John Nahlen Victor Valley Community College District 18422 Bear Valley Road, Bldg 10 Victorville, CA 92395-5850

Attn: Jade Kiphen Victor Valley Memorial Park 17150 C Street

Victorville, CA 92395-3330

Attn: Arnold Villarreal (avillarreal@victorvilleca.gov; ccun@victorvilleca.gov)

Victorville Water District, ID#1 (via email)

P. O. Box 5001

Victorville, CA 92393-5001

Attn: Arnold Villarreal (avillarreal@victorvilleca.gov; kmetzler@victorvilleca.gov; snawaz@victorvilleca.gov)

Victorville Water District, ID#1 (via email)

P. O. Box 5001

Victorville, CA 92393-5001

Attn: Arnold Villarreal (sashton@victorvilleca.gov; avillarreal@victorvilleca.gov; dmathews@victorvilleca.gov)

Victorville Water District, ID#2 (via email)

P. O. Box 5001

Victorville, CA 92393-5001

Vogler, Albert H. 17612 Danbury Ave. Hesperia, CA 92345-7073

Attn: Joan Wagner Wagner Living Trust 22530 Calvert Street

Woodland Hills, CA 91367-1704

Attn: Christian Joseph Wakula Wakula Family Trust

11741 Ardis Drive

Garden Grove, CA 92841-2423

(Jlow3367@gmail.com) Wang, Steven (via email) 2551 Paljay Avenue Rosemead, CA 91770-3204 Attn: Barbara Allard-Ward (kenbombero@aol.com; allardward@aol.com)

Ward, Barbara (via email) 655 That Road Weiser, ID 83672-5113

Weeraisinghe, Maithri N.

Ward, Raymond P. O. Box 358

Newberry Springs, CA 92365-0358

Weems, Lizzie 9157 Veranda Court Las Vegas, NV 89149-0480

P. O. Box 487 Barstow, CA 92312-0487

(andrewwerner11@gmail.com) Werner, Andrew J. (via email) 1718 N Sierra Bonita Ave Los Angeles, CA 90046-2231 Attn: James Woody West End Mutual Water Company P. O. Box 1732 Lucerne Valley, CA 92356 West, Howard and Suzy 9185 Loma Vista Road Apple Valley, CA 92308-0557

West, Jimmie E. P. O. Box 98

Oro Grande, CA 92368-0098

Attn: Genaro Zapata Westland Industries, Inc. 520 W. Willow St. Long Beach, CA 90806-2800

Attn: Manoucher Sarbaz Wilshire Road Partners 9903 Santa Monica Blvd., PMB #541 Beverly Hills, CA 90212-1671

Attn: Mark J. Cluff WLSR, Inc. 3507 N 307th Drive Buckeye, AZ 85396-6746

Attn: Eric L. Dunn, Esq. (edunn@awattorneys.com) Aleshire & Wynder, LLP (via email) 2361 Rosecrans Avenue Suite 475 El Segundo, CA 90245-4916

**g** , ......

Attn: Wesley A. Miliband, Esq. (wes.miliband@aalrr.com)
Atkinson, Andelson, Loya, Ruud & Romo

2151 River Plaza Drive Suite 300

(via email)

Sacramento, CA 95833-

Attn: Piero C. Dallarda, Esq. (piero.dallarda@bbklaw.com)
Best, Best & Krieger LLP (via email)

P.O. Box 1028 Riverside, CA 92502-

Attn: Eric L. Garner, Esq. (eric.garner@bbklaw.com)

Best, Best & Krieger LLP (via email)

3750 University Avenue

3rd Floor

Riverside, CA 92502-1028

Attn: Nick Gatti ()

Western Development and Storage, LLC (via

email)

5701 Truxtun Avenue, Ste. 201 Bakersfield, CA 93309-0402

Attn: Thomas G. Ferruzzo (tferruzzo@ferruzzo.com) Wet Set, Inc. (via email)

44505 Silver Valley Road, Lot #05 Newberry Springs, CA 92365-9565

Attn: Connie Tapie

(praisethelord77777@yahoo.com) Withey, Connie (via email)

P. O. Box 3513

Victorville, CA 92393-3513

Attn: David A. Worsey Worsey, Joseph A. and Revae

P. O. Box 422

Newberry Springs, CA 92365-0422

Attn: Christine M. Carson, Esq. (ccarson@awattorneys.com)
Aleshire & Wynder, LLP (via email)

2361 Rosecrans Avenue

Suite 475

El Segundo, CA 90245-4916

Attn: W.W. Miller, Esq. (bmiller@aalrr.com) Atkinson, Andelson, Loya-Ruud & Romo (via

email)

3612 Mission Inn Avenue, Upper Level

Riverside, CA 92501

Attn: Aloson Toivola, Esq. (alison.toivola@bbklaw.com) Best, Best & Krieger LLP (via email)

300 South Grand Avenue

25th Floor

Los Angeles, CA 90071

Attn: Stephanie Osler Hastings, Esq. (SHastings@bhfs.com; mcarlson@bhfs.com) Brownstein Hyatt Farber Schreck, LLP (via

email)

1021 Anacapa Street, 2nd Floor Santa Barbara, CA 93101-2102 Attn: Chung Cho Gong Western Horizon Associates, Inc.

P. O. Box 397

Five Points, CA 93624-0397

Wiener, Melvin and Mariam S. 1626 N. Wilcox Avenue Los Angeles, CA 90028-6234

Witte, E. Daniel and Marcia 31911 Martino Drive Daggett, CA 92327-9752

(thechelseaco@yahoo.com) Yang, Zilan (via email) 428 S. Atlantic Blvd #205 Monterey Park, CA 91754-3228

Attn: Alison Paap (apaap@agloan.com) American AgCredit (via email) 42429 Winchester Road Temecula, CA 92590-2504

Attn: Christopher L. Campbell, Esq. Baker, Manock & Jensen 5260 N. Palm Avenue, 4th Floor Fresno, CA 93704-2209

Attn: Christopher Pisano, Esq. (christopher.pisano@bbklaw.com)
Best, Best & Krieger LLP (via email)
300 South Grand Avenue

254 F1

25th Floor

Los Angeles, CA 90071

Attn: William J. Brunick, Esq. (bbrunick@bmklawplc.com)

Brunick, McElhaney & Kennedy PLC (via

email)

1839 Commercenter West

P.O. Box 13130

San Bernardino, CA 92423-3130

Attn: Terry Caldwell, Esq. Caldwell & Kennedy 15476 West Sand Street

Victorville, CA 92392

Attn: Nancy McDonough California Farm Bureau Federation 2300 River Plaza Drive Sacramento, CA 95833

Attn: Andrew L. Jared, Esq. (ajared@chwlaw.us) Colantuono, Highsmith & Whatley, PC (via 790 E. Colorado Blvd., Suite 850 Pasadena, CA 91101-2109

Attn: Ed Dygert, Esq. Cox, Castle & Nicholson 2049 Century Park East, 28th Floor Los Angeles, CA 90067

Attn: James S. Heiser, Esq. Ducommun, Inc. 23301 S. Wilmington Avenue Carson, CA 90745

Attn: Thomas G. Ferruzzo, Esq. (tferruzzo@ferruzzo.com) Ferruzzo & Ferruzzo, LLP (via email) 3737 Birch Street, Suite 400 Newport Beach, CA 92660

Attn: Paige Gosney, Esq. (paige.gosney@greshamsavage.com;Dina.Snid er@GreshamSavage.com) Gresham, Savage, Nolan & Tilden, LLP (via email) 550 E Hospitality Ln, Ste. 500 San Bernardino, CA 92408-4208

Attn: Michael Turner, Esq. (mturner@kasdancdlaw.com) Kasdan, LippSmith Weber Turner, LLP (via email) 19900 MacArthur Blvd., Suite 850 Irvine, CA 92612-

Attn: Peter J. Kiel (pkiel@cawaterlaw.com) Law Office of Peter Kiel PC (via email) PO Box 422 Petaluma, CA 94953-0422

Attn: Stephen Puccini (stephen.puccini@wildlife.ca.gov) California Department of Fish and Wildlife (via email)

Attn: Jeffery L. Caufield, Esq. (Jeff@caufieldjames.com) Caufield & James, LLP (via email) 2851 Camino Del Rio South, Suite 410 San Diego, CA 92108-

Attn: Maria Insixiengmay (Maria.Insixiengmay@cc.sbcounty.gov) County of San Bernardino, County Counsel (via email) 385 N. Arrowhead Avenue, 4th Floor San Bernardino, CA 92415-0140

Attn: Noah GoldenKrasner, Dep (Noah.GoldenKrasner@doj.ca.gov) Department of Justice (via email) 300 S. Spring Street, Suite 1700 Los Angeles, CA 90013

Attn: Marlene Allen Murray, Esq. (mallenmurray@fennemorelaw.com) Fennemore LLP (via email) 550 East Hospitality Lane Suite 350 San Bernardino, CA 92408-4206

Attn: Toby Moore, PhD, PG, CHG (TobyMoore@gswater.com) Golden State Water Company (via email) 160 W. Via Verde, Suite 100 San Dimas, CA 91773-

Attn: Calvin R. House, Esq. Gutierrez, Preciado & House 3020 E. Colorado BLVD Pasadena, CA 91107-3840

Attn: Mitchell Kaufman, Esq. (mitch@kmcllp.com) Kaufman McAndrew LLP (via email) 16633 Ventura Blvd., Ste. 500 Encino, CA 91436-1835

Attn: Fred J. Knez, Esq. Law Offices of Fred J. Knez 6780 Indiana Ave, Ste 150 Riverside, CA 92506-4253

Attn: Alexander Devorkin, Esq. California Department of Transportation 100 South Main Street, Suite 1300 Los Angeles, CA 90012-3702

Attn: Matthew T. Summers, Esq. (msummers@chwlaw.us) Colantuono, Highsmith & Whatley, PC (via 790 E. Colorado Blvd., Suite 850 Pasadena, CA 91101-2109

Attn: Robert E. Dougherty, Esq. Covington & Crowe 1131 West 6th Street Suite 300 Ontario, CA 91762

Attn: Marilyn Levin, Dep (Marilyn.Levin@doj.ca.gov) Department of Justice (via email) 300 S. Spring Street, Suite 1702 Los Angeles, CA 90013

Attn: Derek Hoffman, Esq. (dhoffman@fennemorelaw.com) Fennemore LLP (via email) 550 East Hospitality Lane Suite 350 San Bernardino, CA 92408-4206

Attn: Michelle McCarron (mmccarron@gdblawoffices.com; andre@gdblawoffices.com) Green de Bortnowsky, LLP (via email) 30077 Agoura Court, Suite 210 Agoura Hills, CA 91301-2713

Attn: Curtis Ballantyne, Esq. Hill, Farrer & Burrill 300 S. Grand Avenue, 37th Floor 1 California Plaza Los Angeles, CA 90071

Attn: Thomas S. Bunn, Esq. (TomBunn@lagerlof.com) Lagerlof, Senecal, Gosney & Kruse, LLP (via email) 301 N. Lake Avenue, 10th Floor Pasadena, CA 91101-5123

Attn: Robert C. Hawkins, Esq. Law Offices of Robert C. Hawkins 14 Corporate Plaza, Suite 120 Newport, CA 92660

Attn: Arthur G. Kidman, Esq. McCormick, Kidman & Behrens 695 Town Center Drive, Suite 400 Costa Mesa, CA 92626-7187

Attn: Frederic A. Fudacz, Esq. (ffudacz@nossaman.com)
Nossaman LLP (via email)
777 South Figueroa Street, 34th Floor
Los Angeles, CA 90017-

Attn: Steven B. Abbott, Esq. (sabbott@redwineandsherrill.com; fluna@redwineandsherrill.com)
Redwine and Sherrill (via email)
3890 Eleventh Street
Suite 207
Riverside, CA 92501-

Attn: Elizabeth Hanna, Esq. Rutan & Tucker P.O. Box 1950 Costa Mesa, CA 92626

Attn: Mary Howard Southern California Gas Company Transmission Environmental Consultant P. O. Box 2300, ML9314 Los Angeles, CA 91313-2300

Attn: Robert C. Wagner, P.E. (rcwagner@wbecorp.com)
Wagner & Bonsignore
Consulting Civil Engineers (via email)
2151 River Plaza Drive, Suite 100
Sacramento, CA 95833-4133

Attn: Jeffrey D Ruesch (watermaster@mojavewater.org) Mojave Basin Area Watermaster (via email) 13846 Conference Center Drive Apple Valley, CA 92307

Attn: Kieth Lemieux (KLemieux@omlolaw.com) Olivarez Madruga Lemieux O'Neill, LLP (via email) 500 South Grand Avenue, 12th Floor Los Angeles, CA 90071-2609

Attn: Todd O. Maiden, Esq. (TMaiden@ReedSmith.com) Reed Smith LLP (via email) 101 Second Street Suite 1800 San Francisco, CA 94105-

Attn: Randall R. Morrow, Esq. Sempra Energy Law Department Office of the General Counsel 555 West Fifth Street, Suite 1400 Los Angeles, CA 90013-1011

Attn: Rick Ewaniszyk, Esq. The Hegner Law Firm 14350 Civc Drive Suite 270 Victorville, CA 92392 Attn: Adnan Anabtawi (aanabtawi@mojavewater.org) Mojave Water Agency (via email) 13846 Conference Center Drive Apple Valley, CA 92307

Attn: Betsy Brunswick (bmb7@pge.com)
Pacific Gas and Electric Company (via email)
77 Beale Street, B28P
San Francisco, CA 94105-1814

Attn: James L. Markman, Esq. Richards, Watson & Gershon 1 Civic Center Circle P.O. Box 1059 Brea, CA 92822-1059

Attn: Shannon Oldenburg, Esq. (shannon.oldenburg@sce.com)
Southern California Edison Company
Legal Department (via email)
P.O. Box 800
Rosemead, CA 91770

Attn: Agnes Vander Dussen Koetsier (beppeauk@aol.com)
Vander Dussen Trust, Agnes & Edward (via email)
P.O. Box 5338
Blue Jay, CA 92317-