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EXEMPT FROM FILING FEES
GOV. CODE § 6103

11 Attorneys for Defendant VICTORVILLE WATER DISTRICT, a subsidiary district of the CITY
12 OF VICTORVILLE (formerly VICTOR VALLEY WATER DISTRICT and BALDY MESA
13 WATER DISTRICT)

14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
15 **FOR THE COUNTY OF RIVERSIDE**

16 Coordination Proceeding Special Title
17 (Cal. Rules of Court, rule 3.550)

JCCP NO. 5265
Case No. CIV208568

18 **MOJAVE BASIN WATER CASES**

Assigned for All Purposes to Hon. Harold
W. Hopp, Department 1

19 **CITY OF BARSTOW,**

20 **Plaintiff,**

21 **v.**

22 **CITY OF ADELANTO, et al.,**

23 **Defendants.**

**NOTICE OF ERRATA REGARDING
DECLARATION OF PETER LEFFLER IN
SUPPORT OF VICTORVILLE WATER
DISTRICT'S OPPOSITION TO GOLDEN
STATE WATER COMPANY'S MOTION
TO ENFORCE JUDGMENT**

24 October 22, 2024
1:30 p.m.
Department M302 – Menifee Justice Center

25 **AND RELATED CROSS ACTIONS**

26 Hon. Craig G. Riemer, Judge Presiding by
Assignment

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Victorville Water District provides this Notice of Errata that the *curriculum vitae* of Peter Leffler, Exhibit A to the Declaration of Peter Leffler in Support of Victorville Water District's Amended Opposition Golden State Water Company Motion to Enforce Judgment was inadvertently omitted from the Declaration filed and served October 9, 2024. A corrected Declaration with Exhibit A, which is otherwise identical, is attached as Exhibit 1.

Dated: October 15, 2024

Law Office of Peter Kiel PC



Peter J. Kiel
Attorney for Defendant Victorville Water District, a subsidiary district of the City of Victorville

EXHIBIT 1 TO NOTICE OF ERRATA

**CORRECTED DECLARATION OF PETER LEFFLER IN SUPPORT OF VICTORVILLE WATER DISTRICT'S
OPPOSITION TO GOLDEN STATE WATER COMPANY'S MOTION TO ENFORCE JUDGMENT**

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18 MOJAVE BASIN WATER CASES

Assigned for All Purposes to Hon. Harold
W. Hopp, Department 1

19 CITY OF BARSTOW,
20 Plaintiff,

21 v.

22 CITY OF ADELANTO, et al.,
23 Defendants.

**DECLARATION OF PETER LEFFLER
IN SUPPORT OF VICTORVILLE
WATER DISTRICT'S AMENDED
OPPOSITION TO GOLDEN STATE
WATER COMPANY MOTION TO
ENFORCE JUDGMENT**

**October 22, 2024
1:30 p.m.
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24 AND RELATED CROSS ACTIONS

Hon. Craig G. Riemer, Judge Presiding by
Assignment

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1 I, Peter Leffler, declare:

2 1. I have personal knowledge of the matters stated in this declaration, and, if called, I
3 would competently testify as follows.

4 2. I am a California registered Professional Geologist (CA No. 6475) and Certified
5 Hydrogeologist (CA No. 462). I am Senior Principal Hydrogeologist with Luhdorff & Scalmanini
6 Consulting Engineers (LSCE). I have been employed by LSCE for 10 years and have been
7 employed in similar capacities by other firms since 1990. I have thirty-five years of professional
8 experience in groundwater consulting with a focus on groundwater resource development,
9 management and protection. In terms of adjudicated groundwater basins, I have provided expert
10 testimony for the Antelope Valley, currently serve as the Basin Engineer reporting to the Court for
11 the Santa Maria Valley Management Area in Santa Maria Groundwater Basin, and reevaluated the
12 original Court determined safe yield in Cummings Groundwater Basin. I have provided
13 groundwater consulting services in well over one dozen additional groundwater basins. My
14 curriculum vitae is attached. (Exhibit A.)

15 3. LSCE and I were retained by counsel for Victorville Water District (VWD) to
16 provide hydrologic and hydrogeologic services to VWD regarding the Mojave Basin Area
17 adjudication and related matters.

18 4. VWD counsel requested that I review and provide opinions on the Declaration of
19 Anthony Brown in Support of the Golden State Water Company (GSWC) Motion to Enforce
20 Judgment (Brown Declaration) and Mr. Brown's September 2024 report entitled, Expert Report
21 of Anthony Brown Hydrologic Conditions and Water Flow Between the Alto Subarea and Centro
22 Subarea of the Mojave Basin (Brown Report). Paragraphs 4 through 12 contain my observations
23 regarding the Brown Report. Paragraphs 13 through 17 contain my critique of the Brown
24 Declaration's summary conclusions.

25 4. I observe that the Brown Report Figures 5-2 to 5-18 show a strong relationship
26 between GSWC water levels and very wet years with high river flows (WYs 2005, 2011 and 2023).
27 There is a generally consistent pattern with groundwater elevations increasing significantly in
28 GSWC wells in response to the wettest years, followed by a gradual decline in groundwater

1 elevations until the next very wet year.

2 5. The Brown Report Figures 5-2 to 5-18 use a misleading 20-year period that starts
3 right after groundwater elevations in GSWC wells increased dramatically in response to the 2005
4 wet year. Of the three very wet years that occurred during the 2005 to 2024 period,¹ water year
5 2005 was considerably wetter than 2011 and 2023. (See Updates for PSY, Consumptive Uses, and
6 Free Production Allowance Recommendations (FPA) for Water Year 2024-25 (Feb. 2024)
7 (February 2024 PSY/FPA Tech Memo), Figure 3.) Thus, the starting point for the Brown Report
8 20-year period is artificially inflated (*i.e.*, has abnormally high groundwater elevations) by
9 selecting 2005 as the first year of the 20-year sequence. The Brown Report's use of artificially
10 high groundwater elevations in the first year of the analysis period tends to give the impression of
11 declining groundwater elevations that may only be occurring because the starting point is not
12 representative.

13 6. There was an unusually long period between very wet years from 2011 to 2023,
14 which has not occurred since the 1940s/1950s. The period from 2011 to 2022 had only 42% of
15 the long-term average supply from 1931 to 1990. (See February 2024 PSY/FPA Tech Memo,
16 Figure 3.) Thus, the main portion of the time period selected by Brown showing declining
17 groundwater elevations (2011 through 2022) corresponds with a much drier than average
18 condition.² This means that the main portion of the Brown Report's 20-year period reflects the
19 expected gradual decline of groundwater elevations in GSWC wells from 2011 until the next very
20 wet year in 2023.

21 7. This period of gradually declining groundwater elevation from 2011 through 2022
22 neither reflects the long-term average conditions upon which the Judgment is based, nor the longer
23 period from entry of Judgment to present. Determining safe/sustainable yield and associated
24 potential for chronic groundwater elevation decline requires the collection and analysis of data
25 over a multi-decade period (and preferably longer than 20 years for the type of analysis contained
26 in the Brown Report) that is representative of longer-term climatic/hydrologic conditions. The

27 _____
28 ¹ All periods referenced herein are inclusive unless stated otherwise.

² The Watermaster Opposition to GSWC Motion to Enforce Judgment (Sept. 2024) notes this fact as well.

1 selected period for analysis should begin and end in below average water years to minimize water
2 in transition and change in storage in the vadose zone.³ The Brown Report’s period of analysis,
3 to the contrary, begins in a wet year.

4 8. Despite the Brown Report’s flaws described in paragraphs 4 through 7 herein, the
5 groundwater elevations in GSWC wells during 2024 are very similar to groundwater elevations
6 that occurred 15 years earlier. The Brown Report hydrographs for the selected period do not
7 adequately demonstrate the occurrence of long-term chronic groundwater elevation declines in
8 GSWC wells.

9 9. Moreover, the Brown Report does not provide groundwater level data for non-
10 GSWC wells in the Centro Subarea or Transition Zone. As a result, the Brown Report provides
11 no information demonstrating long-term chronic groundwater level declines in non-GSWC wells
12 within the Centro Subarea.

13 10. Concentrated pumping can cause localized groundwater elevation declines and/or
14 groundwater elevation depressions, which may not be representative of the subbasin/subarea water
15 balance as a whole. The occurrence of mutual well pumping interference and/or the presence of
16 discharge boundaries (low permeability) within the radius of pumping influence may cause
17 localized groundwater level declines.

18 11. The Brown Report lacks any analysis of or reference to well construction data,
19 which—along with discussion of the local hydrostratigraphy—is necessary for interpreting
20 groundwater level fluctuations in GWSC wells.

21 12. While the Brown Report’s use of a 20-year period is likely too short, the
22 Watermaster recently used the period from 2001 through 2020 as the hydrologic base period for
23 reevaluating Production Safe Yield and Consumptive Use. (*February 2024 PSY/FPA Tech*
24 *Memo.*) Because the period from 2001 to 2020 begins and ends with below average years, the
25 Watermaster’s hydrologic base period is more appropriate for conducting the analysis that the
26

27 ³*California’s Groundwater; Working Toward Sustainability*, CALIFORNIA DEPARTMENT OF WATER RESOURCES
28 (Bulletin 118 Interim Update, 2016),
https://link.edgepilot.com/s/7cb9e513/LdfLkMR2HEihlnyg8nGwjg?u=https://cawaterlibrary.net/wp-content/uploads/2017/05/Bulletin_118_Interim_Update_2016.pdf.

1 Brown Report seeks to provide. Although conducting the Brown Report’s analysis during the
2 period from 2001 through 2020 would still be subject to many of the issues that this declaration
3 discusses, doing so would at least (1) provide a more representative period for analysis and (2) be
4 consistent with the Watermaster’s hydrologic base period.

5 13. Mr. Brown expresses the following conclusory opinion: “Production wells operated
6 by GSWC in the Centro Subarea of the adjudicated Basin are experiencing chronic water level
7 declines. In simple terms, considering a conservation of mass, groundwater level declines (i.e.,
8 loss of storage) result from excessive discharge (e.g., over-pumping) and/or insufficient recharge
9 (e.g., river seepage).” (Brown Declaration, paragraph 11, subparagraph 1.) The evidence does
10 not support this opinion for the following reasons:

11 a. The GSWC well level data presented by Mr. Brown does not adequately
12 demonstrate chronic water level declines. The period selected is too short to represent long-term
13 average conditions in the Mojave Basin. The starting year, 2005, was a very wet year with
14 abnormally high groundwater elevations due to high Mojave River flows. Therefore, the starting
15 year for Mr. Brown’s analysis does not represent an average hydrological condition for comparison
16 to subsequent year conditions, which skews his opinion toward a conclusion that groundwater
17 levels in the Centro Area are declining.

18 b. Mr. Brown does not discuss Watermaster evidence showing stable
19 groundwater levels in the Transition Zone and western portion of the Centro Subarea. (Wagner
20 Declaration ISO Opposition to GSWC Motion (*Wagner Declaration*), Exhibit A, Alto Subarea
21 Transition Zone Hydrographs 2024 at pdf pp. 15-16; *Wagner Declaration*, Exhibit B, Centro
22 Subarea Hydrographs 2024 at pdf pp. 17-18.)

23 c. The Brown Declaration and Report do not provide sufficient information to
24 assess whether the combination of GSWC groundwater well production and nearby non-GSWC
25 groundwater well production is the cause of short-term groundwater level declines in GSWC wells.
26 Moreover, the Brown Declaration and Report do not account for localized hydrogeologic
27 conditions, such as faults and flow barriers, that may exacerbate well interferences and contribute
28 to conditions not experienced elsewhere in the Centro Subarea.

1 d. The data in the Brown Report indicates that GSWC well levels exhibit rapid
2 increases following larger Mojave River flow events. The Brown Report does not assess whether
3 short-term groundwater level declines in GSWC wells most closely correlate with reduced Mojave
4 River flows during extended drought periods.

5 14. Mr. Brown expresses the following conclusory opinion: “Based on currently
6 available data and analyses performed by aquilogic, the observed chronic water level declines at
7 GSWC’s production wells in the Centro Subarea do not result from over-pumping at the wells.”
8 (Brown Declaration, paragraph 11, subparagraph 2.) The evidence does not support this opinion
9 for the following reasons:

10 a. The Brown Declaration and Report do not provide sufficient data to assess
11 whether pumping from GSWC and non-GSWC wells affects groundwater levels in GSWC wells.

12 b. Mr. Brown’s data does suggest that localized pumping by GSWC and non-
13 GSWC wells may exceed the near-term average recharge, especially over the period from 2011 to
14 2022. (*See Paragraph 6, above, of this Declaration.*)

15 15. Mr. Brown expresses the following conclusory opinion: “Thus, it is more likely that
16 recharge to the Centro Subarea from the Alto Subarea has decreased and contributed to the
17 observed chronic water level declines.” (Brown Declaration, paragraph 11, subparagraph 3.) The
18 evidence does not support this opinion for the following reasons:

19 a. Mr. Brown does not discuss Watermaster evidence showing groundwater
20 levels in the Transition Zone and western portion of the Centro Subarea to be stable and at higher
21 elevation than levels near GSWC wells.

22 b. Mr. Brown does not acknowledge that GSWC wells respond positively to
23 very high Mojave River flows.

24 c. Mr. Brown fails to recognize or, at least, raise and dismiss the possibility
25 that localized pumping and reduced Mojave River flow during drought periods are the cause of
26 chronic groundwater level declines at GSWC wells (if, in fact, such declines are occurring).

27 16. Mr. Brown expresses the following conclusory opinion: “There is currently a deficit
28 in the volume of water producers in the Alto Subarea are obligated under the Judgment to deliver

1 as recharge to the Centro Subarea.” (Brown Declaration, paragraph 11, subparagraph 4.) The
2 evidence does not support this opinion for the following reasons:

3 a. As described by the Watermaster, the Judgment does not create obligations to
4 the Centro Subarea for the Alto Subarea, rather the Alto Subarea has obligations to the Transition
5 Zone. (Watermaster Opposition to GSWC Motion to Enforce Judgment (Sept. 2024)
6 (*Watermaster Opposition*).

7 b. There is no substantial evidence in the Brown Declaration and Report to support
8 the conclusion that there is a deficit in the volume of water producers in the Alto Subarea are
9 obligated to provide under the Judgment to deliver as recharge to the Transition Zone. Conversely,
10 the Watermaster does present substantial evidence that the Alta Subarea is meeting its subarea
11 obligation to the Transition Zone. (*February 2024 PSY/FPA Tech Memo*; Watermaster Motion
12 to Adjust Free Production Allowance for Water Year 2024-2025; *Watermaster Opposition*.)

13 17. It is my opinion that it is not possible to draw any meaningful conclusions about Centro
14 Subarea conditions using only observations of GSWC well elevations and pumping. The Brown
15 Report does not evaluate numerous factors that may affect groundwater elevations in GSWC wells,
16 including factors such as pumping by nearby groundwater producers and hydrogeologic conditions
17 of the Centro Area. Further, given that Watermaster is scheduled to release—three months from
18 now—an updated Upper Mojave River Basin Model that includes data and estimates for all
19 Subareas, including the Transition Zone and Centro Subarea, the Brown Declaration and Report
20 prematurely draw conclusions concerning the adequacy of the Watermaster’s model and the results
21 thereof. Accordingly, the Brown Declaration and Report do not support the conclusions (1) that
22 GSWC wells are exhibiting a chronic lowering or (2) that the Alto Subarea has not fulfilled its
23 subarea obligations.

24 I declare under penalty of perjury that the foregoing is true and correct. Executed on
25 October 9, 2024 in Daly City, California.

26
27 

28 Peter Leffler _____

EXHIBIT A

Curriculum Vitae of Peter Leffler



PETER LEFFLER, PG, CHG

Principal Hydrogeologist

Years of Experience

30+

Education

MS, Hydrology/Hydrogeology,
University of Nevada, Reno

BS, Geology, University of Illinois,
Champaign

Professional Registrations

Professional Geologist
CA No. 6475

Certified Hydrogeologist
CA No. 462

Professional Affiliations

- Groundwater Resources Association of California
- National Groundwater Association
- Geological Society of America

Peter is a registered geologist and hydrogeologist in California and has over thirty years of professional experience in groundwater consulting with a focus on groundwater resource development, management, and protection. Representative assignments include groundwater basin hydrogeologic characterization, water balances, groundwater modeling, and safe yield analyses; monitoring well, test well, and production well design, construction, aquifer testing, and groundwater quality sampling; groundwater impact studies related to treated wastewater disposal; evaluation of percolation pond capacity; groundwater quality studies; seawater intrusion analysis; groundwater impact studies to support CEQA analyses; expert witness testimony; assessment of groundwater flow and well yields in fractured bedrock; and aquifer storage and recovery feasibility studies.

Peter has extensive experience working in several different California groundwater basins in terms of basin-scale hydrogeologic characterization, water balances, groundwater modeling, safe/sustainable yield analysis, and basin management (e.g., Santa Maria Valley, Paso Robles Subbasin, East Bay Plain Subbasin, Chowchilla Subbasin, Madera Subbasin, Kaweah Subbasin, Tehachapi Valley Groundwater Basin, Cummings Valley Groundwater Basin, Salinas Valley, East Contra Costa Subbasin, and several others). Peter also has extensive experience working on adjudicated groundwater basins (e.g., Antelope Valley, Santa Maria Valley), preparation and implementation of groundwater sustainability plans (e.g., Chowchilla Subbasin, Madera Subbasin, East Bay Plain Subbasin), and serving on technical review committees (e.g., Hydrogeologic Working Group for Monterey Peninsula Water Supply Project, Groundwater Technical Advisory Committee for Salinas Valley 180/400-Foot Aquifer Subbasin).

EXPERIENCE

Salinas Valley 180/400-Foot Aquifer Subbasin, Monterey County, CA (ongoing): Currently serving as a member of the Groundwater Technical Advisory Committee or GTAC for implementation of the Groundwater Sustainability Plan (GSP) in the 180/400-Foot Aquifer Subbasin in Salinas Valley. Over the past three years, the group has been reviewing potential projects and management actions outlined in the GSP to address seawater intrusion and achieve sustainability, reviewing and commenting on an ongoing Deep Aquifer study, and reviewing and commenting on the development of a variable density seawater intrusion model that will be used to further evaluate the potential projects and management actions.

Monterey Peninsula Water Supply Project (MPWSP), Monterey County, CA (ongoing): Currently serving as an expert witness for California American Water in California, a legal case that was referred to the State Water Resources Control Board Administrative Hearings Office (SWRCB AHO) for hearings that have been conducted during 2022 and 2023, which will result in an expert report to be submitted to the Court by the SWRCB in 2024. The project involves a proposed desalination plant in Monterey County that would utilize production slant wells located on the beach for extraction of desalination plant feedwater. The case centers around the potential impacts (or lack thereof) of MPWSP beach slant wells on the Salinas Valley Groundwater Basin. Work completed so far has included preparation of several rounds of written direct and rebuttal testimony and providing verbal testimony on key technical issues during three phases of SWRCB AHO hearings.

Pete serves as a member of the Hydrogeologic Working Group (HWG), which was developed in 2013 to provide technical evaluations of groundwater-related issues for the potential development of the MPWSP. The HWG designed and implemented a field data collection program involving the drilling/installation of a full-scale saline groundwater production intake well (test slant well) on the beach, drilling/installation of nested monitoring wells (three wells at each location) at eight different sites, long-term regional aquifer testing conducted over a nearly three-year period that involved collection of water level and water quality data at 24 nested monitoring wells and the test slant well, hydrogeologic analyses, and development/calibration of a groundwater model. Several letters, technical memos (TMs), and reports have been prepared to summarize HWG findings. The HWG has also reviewed and provided comments on several studies in the area conducted by others.

Groundwater Storage and Recovery Project, San Francisco Public Utilities Commission, CA (ongoing): Since 2004, LSCE has provided a wide range of hydrogeological and related civil engineering services to the San Francisco Public Utilities Commission (SFPUC). LSCE provided construction and testing oversight for seven new wells constructed as part of the SFPUC's Groundwater Storage and Recovery (GSR) project. The wells were located at seven different sites in and around the San Bruno, Millbrae, and Daly City areas of San Mateo County. Each well site was unique regarding the working area, proximity to residences, access to sites, ground conditions, and fluid disposal. The required installation of new and upgraded distribution

system components, pipelines, pump stations, and other facilities as part of the larger GSR project further complicated the logistics of well installation. LSCE continues to assist the SFPUC with ongoing well operations and maintenance work.

Chowchilla Subbasin and Madera Subbasin, Madera County, CA (ongoing): Served as Project Hydrogeologist for work conducted from 2018 through 2023, including preparing GSPs for each critically overdrafted Subbasin to meet DWR SGMA requirements. These GSPs involved preparing the hydrogeologic conceptual model for each groundwater basin, construction/calibration of a groundwater model, evaluation/development of sustainable management criteria, and extensive GSA and stakeholder outreach meetings during GSP development. The current work includes updates on the ongoing preparation of GSP Annual Reports for each Subbasin and responding to Department of Water Resources (DWR) comments to prepare GSP updates and revisions. Several additional projects have been conducted for both subbasins since 2019, including nested monitoring well installation, representative monitoring site (RMS) water level and water quality data collection, domestic well inventories to provide input to Domestic Well Mitigation Programs, and preparation of grant applications (e.g., recharge projects).

East Bay Plain Subbasin, East Bay Municipal Utility District and City of Hayward GSAs, Alameda County, CA (ongoing): Serving as Project Manager for work conducted from 2019 through 2023 that has included the preparation of a GSP for the Subbasin to meet DWR SGMA requirements (which was subsequently approved in 2023). The GSP included a data compilation and data gaps analysis, preparation of the hydrogeologic conceptual model for the groundwater basin, construction/calibration of a groundwater model, evaluation/development of sustainable management criteria, and extensive GSA and stakeholder outreach meetings during GSP development. The current work includes the preparation of GSP Annual Reports and working with DWR to prepare GSP updates and revisions. A separate project currently being conducted under a DWR Prop 68 grant includes evaluating interconnected surface water using isotopes, nested monitoring well installation, regional aquifer testing, and using groundwater isotopes to evaluate subbasin boundary conditions.

Santa Maria River Valley Groundwater Basin, Twitchell Management Authority, northern Santa Barbara and southern San Luis Obispo Counties, CA (ongoing):

Currently serving as Basin Engineer for the Santa Maria Valley Management Area (SMVMA) of the Santa Maria Valley Groundwater Basin. The Santa Maria River Valley Groundwater Basin underwent a groundwater basin adjudication process in the early 2000s and is currently managed as three separate areas. LSCE has served as the Basin Engineer for the largest management area, Santa Maria Valley Management Area (SMVMA), since 2008. A detailed and comprehensive annual report is prepared every year for submittal to the Court that summarizes SMVMA climatic conditions, surface water conditions (discharge and water quality), reservoir operations (storage and releases), groundwater conditions (water levels and quality), water requirements, and water supplies, and water disposition. In accordance with the Court Stipulation, an evaluation is made each year of whether or not the SMVMA is experiencing a severe water shortage per the four criteria established by the Court. A public presentation is made each year with annual report findings, and the final report is submitted to the Court.

Bayside ASR Project Aquifer Testing, East Bay Municipal Utility District, Alameda County, CA (2005 -2011):

Served as Project Manager for extensive aquifer testing conducted using an Aquifer Storage and Recovery (ASR) well in San Lorenzo, CA. Initial testing in 2005 included short-term extraction (4 hours at 1,200 gpm) and injection testing (4 hours at 650 gpm) of the ASR well using a local network of monitoring wells. The pump was pulled and inspected, video logging was conducted, and the pump was reinstalled in conjunction with the short-term aquifer testing effort. A large-scale and long-term aquifer test was conducted in 2010 by pumping the ASR well at 1,400 gpm for two months continuously, followed by collecting two months of recovery data. A local and regional monitoring network, including observation wells ranging from 40 feet to 5 miles from the ASR well in the cities of San Lorenzo, San Leandro, and Hayward, was utilized to collect water levels during the pumping and recovery phases of the long-term regional aquifer test covering large portions of the East Bay Plain and Niles Cone Groundwater Basins. A comprehensive report was prepared that included an evaluation of data from 25 observation wells utilized in the regional long-term test, along with an evaluation of regional aquifer testing conducted by others in the groundwater basin.

Antelope Valley Groundwater Basin Adjudication, Water Supply Purveyors (2010-2011): Served as an expert witness on behalf of Los Angeles County water purveyors regarding the determination of basin-safe yield and provided deposition and trial testimony on issues related to mountain front recharge, bedrock permeability, and groundwater flow through bedrock as a source of recharge to basin alluvium and its contribution to overall basin safe yield. Work completed included technical analyses, preparing an expert report, a deposition, and trial testimony. This phase of the trial was decided in the client's favor by a judge.

SELECTED PRESENTATIONS/ PUBLICATIONS

Nevada Water Resources Association, Annual Conference, Presentation, "Technical Aspects of Surface Water – Groundwater Interaction", February 2, 2011.

Groundwater Resources Association of California, High Resolution Tools and Techniques for Optimizing Groundwater Extraction for Water Supply, Presentation, "Insights on the Interpretation of Water Well Flow-Profiling Results Using Data from Nearby Nested Monitoring Wells", June 19, 2013.

American Ground Water Trust, San Joaquin Valley Groundwater Overdraft Forum, Presentation, "Paso Robles and Pending Groundwater Oversight", November 18, 2013.

U.S. Society of Irrigation and Drainage Professionals, Groundwater Water Issues and Water Management – Strategies Addressing the Challenges of Sustainability, Presentation, "Conjunctive Management of Groundwater and Surface Water in Chowchilla Water District", March 6, 2014.

Association of Ground Water Agencies/American Ground Water Trust, Annual Conference, Everything Aquifers and Groundwater Management, Presentation, "Advantages of Using Surface Water Models and Groundwater Models for Basin Water Budget Determination", February 13, 2018.

Association of California Water Agencies, Panel Member for Attorneys Program, "Are Adjudications an Alternative? How SGMA and Groundwater Adjudications Will Work Together or Not", May 10, 2018.

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF SONOMA

Re: *City of Barstow v. City of Adelanto, et al.*;
Riverside Superior Court Case No.: CIV 208568

I am over 18 years of age, and not a party to this action. I am employed at the Law Office of Peter Kiel PC. My mailing address is Law Office of Peter Kiel PC, PO Box 422, Petaluma, California 95953-422 and my email is pkiel@cawaterlaw.com.

On October 15, 2024, I served the document

NOTICE OF ERRATA RE DECLARATION OF PETER LEFFLER IN SUPPORT OF VICTORVILLE WATER DISTRICT'S AMENDED OPPOSITION TO GOLDEN STATE WATER COMPANY MOTION TO ENFORCE JUDGMENT

By FedEx Overnight Mail to the recipients listed below. I caused such envelope to be delivered by hand to the office of the addressee via overnight delivery pursuant to CCP § 1013(c), with delivery fees fully prepaid or provided for.

By Electronic Mail/Email to the email addresses listed below. Said document was served electronically and the transmission was reported as complete and without error.

To the Attached Service Lise

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this document was executed on October 15, 2024 at Petaluma, California.

/s/ Peter J. Kiel

Peter J. Kiel

Service List

City of Barstow v. City of Adelanto, et al.;
Riverside Superior Court Case No.: CIV 208568

VIA EMAIL AND FEDEX

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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 October 16, 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:

NOTICE OF ERRATA REGARDING DECLARATION OF PETER LEFFLER IN SUPPORT OF VICTORVILLE WATER DISTRICT'S OPPOSITION TO GOLDEN STATE WATER COMPANY'S MOTION TO ENFORCE JUDGMENT

 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 October 16, 2024 at Apple Valley, California.



Jeffrey D. Ruesch

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Johnson, Carlean F. Trust Dated 10/29/2004
(via email)
8626 Deep Creek Road
Apple Valley, CA 92308-8769

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

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
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Kasner Family Limited Partnership (via email)
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Kasner, Robert (via email)
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Katcher, August M. and Marceline
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Kemp, Robert and Rose
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Attn: Peggy Shaughnessy
Kemper Campbell Ranch
10 Kemper Campbell Ranch Road - Office
Victorville, CA 92395-3357

Kim, Jin S. and Hyun H.
419 Sara Jane Ln
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(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 Services District
(via email)
P. O. Box 700
Lake Arrowhead, CA 92352-0700

Mojave Basin Area Watermaster Service List as of October 16, 2024

Attn: Claire Cabrey
(HandleWithClaire@aol.com;
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West Hollywood, CA 90069-4120

(PhillipLam99@Yahoo.com)
Lam, Phillip (via email)
864 Sapphire Court
Pomona, CA 91766-5171

Attn: Robert Lawrence Jr.
Lawrence, William W.
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Lee, Doo Hwan
P. O. Box 556
Lucerne Valley, CA 92356-0556

Attn: Virginia Janovsky
(virginiajanovsky@yahoo.com)
Lem, Hoy (via email)
17241 Bullock St.
Encino, CA 91316-1473

Attn: Billy Liang
Liang, Yuan - I and Tzu - Mei Chen
4192 Biscayne St
Chino, CA 91710-3196

Attn: Manshan Gan
Lo, et al.
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San Gabriel, CA 91776-1724

Attn: Dean Low (lowgo.dean@gmail.com)
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3 Panther Creek Ct.
Henderson, NV 89052-

Attn: Manoucher Sarbaz
Lucerne Valley Partners
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Attn: Nancy Lan
Lake Waikiki
230 Hillcrest Drive
La Puente, CA 91744-4816

(jlanglej@kurschgroup.com)
Langley, James (via email)
12277 Apple Valley Road, Ste. #120
Apple Valley, CA 92308-1701

Lawson, Ernest and Barbara
20277 Rock Springs Road
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Attn: Sepoong & Woo Poong Lee
Lee, et al., Sepoong and Woo Poong
#6 Ensueno East
Irvine, CA 92620-

Lenhart, Ronald and Toni
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Eloy, AZ 85131-3410

Attn: Eric Larsen
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tony.pena@libertyutilities.com)
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Water) Corp. (via email)
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Apple Valley, CA 92307

Attn: Neal Davies (ndavies@terra-gen.com;
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Attn: Marian Walent
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email)
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timrohmbuilding@gmail.com)
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Attn: Gwen L. Bedics
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Mojave Basin Area Watermaster Service List as of October 16, 2024

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Manning, Sharon S.
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McCollum, Charles L.
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Attn: Olivia L. Mead
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Mojave Basin Area Watermaster Service List as of October 16, 2024

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Attn: Mary Ann Norris
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Lucerne Valley, CA 92356-8261

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NSSL, Inc. (via email)
9876 Moon River Circle
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9154 Golden Seal Court
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Attn: Pearl or Gail Nunn
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Attn: Dorothy Ohai
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Chino, CA 91710-5149

Attn: Craig Maetzold
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Omya California, Inc. (via email)
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Hemet, CA 92545-2246

Attn: Nick Higgs
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Porter, Timothy M.
34673 Little Dirt Road
Newberry Springs, CA 92365-9646

Attn: Carin McKay
Precision Investments Services, LLC
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(s_quakenbush@yahoo.com)
Quakenbush, Samuel R. (via email)
236 Iris Drive
Martinsburg, WV 25404-1338

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Quiros, Fransisco J. and Herrmann, Ronald
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Newberry Springs, CA 92365-9438

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Mojave Basin Area Watermaster Service List as of October 16, 2024

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Attn: Brian C. Vail (bvail@river-west.com)
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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-

Attn: Ian Bryant
Rim Properties, LLC
15434 Sequoia Road
Hesperia, CA 92345-1667

Attn: Josie Rios
Rios, Mariano V.
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Barstow, CA 92312-1864

Rivero, Fidel V.
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Corona, CA 92879-0825

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Attn: Jackie McEvoy (billt@rrmca.com)
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Attn: Bill Taylor or Property Mngr
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Robertson's Ready Mix (via email)
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Rossi Family Trust, James Lawrence Rossi
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P. O. Box 120
Templeton, CA 93465-0120

Attn: Robert Vega
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Attn: Sam Marich
Rue Ranch, Inc.
P. O. Box 133109
Big Bear Lake, CA 92315-8915

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

Attn: Sherwin Shoraka
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Attn: Jafar Rashid
(jr123realestate@gmail.com)
S and E 786 Enterprises, LLC (via email)
3300 S. La Cienega Blvd.
Los Angeles, CA 90016-3115

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

Attn: Kanoe Barker
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Sagabean-Barker, Kanoeolokelani L. (via
email)
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(BILLU711@Yahoo.com)
Samra, Jagtar S. (via email)
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San Bernardino Co Barstow - Daggett Airport
268 W. Hospitality Lane, Suite 302
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Detention Center (via email)
222 W. Hospitality Lane, 2nd Floor - SDW
San Bernardino, CA 92415-0415

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San Bernardino, CA 92415-0450

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jbeyeler@sdd.sbcounty.gov;
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San Bernardino County Service Area 42 (via
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waterquality@sdd.sbcounty.gov)
San Bernardino County Service Area 64 (via
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222 W. Hospitality Lane, 2nd Floor - SDW
San Bernardino, CA 92415-0450

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San Bernardino County Service Area 70J (via
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Mojave Basin Area Watermaster Service List as of October 16, 2024

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Attn: Nepal Singh (NepalSingh@yahoo.com)
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Attn: Denise Smith
Smith, Denise dba Amerequine Beauty, Inc
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Attn: Chan Kyun Son
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Attn: Joe Trombino
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Mojave Basin Area Watermaster Service List as of October 16, 2024

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Attn: Lynnette L. Thompson
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Attn: Rodger Thompson
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Van Leeuwen Trust, John A. and Ietie
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