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PER GOV. CODE § 6103

8
9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 COUNTY OF RIVERSIDE

11
12 **CITY OF BARSTOW, et al.,**

13 Plaintiffs,

14 v.

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

16 Defendants.

17
18 **And All Related Cross Actions**

Case No. CIV 208568/JCCP 5265

**CALIFORNIA DEPARTMENT OF FISH
AND WILDLIFE'S MEMORANDUM OF
POINTS AND AUTHORITIES IN
RESPONSE TO WATERMASTER'S
MOTION TO ADJUST FREE
PRODUCTION ALLOWANCE FOR
WATER YEAR 2025-2026**

Date: August 4, 2025
Time: 1:30 p.m.
Dept: 1
Judge: Honorable Craig G. Riemer
Action Filed: November 21, 1990

19
20 **INTRODUCTION**

21 The California Department of Fish and Wildlife (Department) respectfully submits this
22 Response in support of the Mojave Water Agency's (Watermaster) Motion to Adjust Free
23 Production Allowance for Water Year 2025-2026 (2025-2026 Rampdown Motion). Specifically,
24 the Department supports the 2025-2026 Rampdown Motion's request to maintain Free Production
25 Allowance (FPA) at 19.5% for Water Year 2025-2026 in the Baja Subarea (Baja); to maintain
26 Free Production Allowance (FPA) at 50.4% for Water Year 2025-2026 in the Alto Subarea
27 (Alto); and, to maintain Free Production Allowance (FPA) at 56% for Water Year 2025-2026 in
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1 the Centro Subarea (Centro) to continue to comply with the *City of Barstow v City of Adelanto*
2 Judgment entered on January 10, 1996 (Judgment), and to explore additional actions to ensure the
3 sustainability of the Mojave Basin Area (Basin).

4 **BACKGROUND AND HISTORY**

5 The original complaint in this water adjudication was filed by the City of Barstow on May
6 30, 1990. On January 10, 1996, the Court entered the Judgment that addressed the overdraft in all
7 of the five subareas and determined that the Basin had been in a state of overdraft since at least
8 the 1950's. (Judgment p. 45.) The Judgment was upheld on appeal in *City of Barstow v Mojave*
9 *Water Agency* (2000) 23 Cal. 4th 1224. The Department is a party to the Judgment and has
10 statutory and common law responsibilities regarding fish and wildlife resources, including their
11 habitats. (Fish & Game Code, §§ 711.7, 1802.) The Department owns and manages lands in the
12 Basin, including Camp Cady in Baja and the Mojave River Fish Hatchery in Alto. (Declaration
13 of Aaron Johnson in Support of the Department of Fish and Wildlife's Response to
14 Watermaster's Motion to Adjust Free Production Allowance for the 2025-2026 Water Year
15 (Johnson Decl.) at ¶ 3). The Department also owns the Mojave Narrows Regional Park in Alto.
16 (*Ibid.*)

17 **A. The Department Properties Overlying the Basin**

18 When the Department purchased Camp Cady it had extensive surface water and critical
19 public trust resources, including riparian habitat, when it was acquired, which was one of the
20 main reasons it was purchased. (Johnson Decl. at ¶ 28.) When running and pooled surface water
21 was present, cottonwoods and willows were abundant with a dense understory of mesquite.
22 (*Ibid.*) According to Department records, the Mojave River typically surfaced in the center of
23 Camp Cady and generally flowed from late October to August. (*Ibid.*) These surface flows later
24 ceased because of the declining groundwater levels and have not returned except for rare large
25 storm events typically occurring in the winter months. (*Ibid.*)

26 The Department also owns and/or manages the Mojave Narrows Regional Park and the
27 Mojave River Fish Hatchery in Alto. (Johnson Decl. at ¶ 3.) The Department therefore has
28

1 extensive knowledge of the Basin, its workings and its history and is involved on a day-to-day
2 basis with the management of critical public trust resources overlying the Basin.

3 **B. The Terms of the Judgment**

4 The Judgment established a limit on the amount of water each subarea could produce
5 without replacement obligations in one year known as FPA, which can be adjusted on an annual
6 basis. Pursuant to the gradual rampdown in production required by the Judgment, Exhibit H to the
7 Judgment requires Watermaster to recommend a five percent (5%) decrease in the FPA for a
8 subarea when that subarea's FPA exceeds its estimated Production Safe Yield (PSY) by 5% or
9 more on an annual water year basis. (Judgment, Exhibit H ¶ 2a.) The Judgment also established
10 each producer's initial BAP. A producer's BAP was based upon that producer's highest year of
11 water production during the base period of 1986-1990. (*Id.* at ¶ 4g.) The BAP right, or its share of
12 the FPA, is the right of each producer to a *percentage* of the FPA within a given subarea each
13 year. (*Ibid.*) For example, in Baja the Department owns 921 acre-feet of BAP in the Judgment. If
14 the FPA is set at 20.5% of BAP, the Department can produce 189 acre-feet without any
15 replacement water obligations.

16 As part of the Judgment, the Department supported certain terms that were designed to
17 protect the State of California's public trust resources, which the Department has the
18 responsibility to protect. One such term, as mentioned above, is that Exhibit H to the Judgment
19 requires Watermaster to recommend a 5% decrease in the FPA for a subarea when that subarea's
20 FPA exceeds its estimated PSY by 5% or more on an annual water year basis. (Judgment Exhibit
21 H ¶ 2a.)

22 In addition, paragraph 2a of Exhibit H in the Judgment reads: "In considering whether to
23 increase or decrease the Free Production Allowance in a Subarea, Watermaster shall, among other
24 factors, take into consideration for the areas shown on Figure H-1, the Consumptive Use of water
25 by riparian habitat, the protection of public trust resources, including the species listed in Table
26 H-1 and the riparian habitat areas shown on Figure H-1, and whether an increase would be
27 detrimental to the protection of public trust resources." The Watermaster, and the Court, must
28 therefore take into consideration the protection of public trust resources and determine whether

1 keeping the FPA at their current levels in Alto, Centro and Baja “would be detrimental to public
2 trust resources” before deciding whether to keep the FPA the same in these subareas or decrease
3 the FPA in these subareas.

4 **C. The Public Trust Doctrine in Water Rights Cases**

5 The public trust doctrine in the field of California water rights represents the state’s
6 authority to exercise continuous supervision and control over ecological and recreational interests
7 dependent on navigable waters of the state, tributary non-navigable waters of the state, and the
8 lands underlying those waters. (*National Audubon Society v. Superior Court* (1983) 33 Cal.3d
9 419, 425.) “Before state courts and agencies approve water diversions, they should consider the
10 effect of such diversions upon interests protected by the public trust, and attempt, so far as
11 feasible, to avoid or minimize any harm to those interests.” (*Id.* at p. 426.) Courts have
12 recognized these interests to include, for example, “the scenic views of [a] lake and its shore, the
13 purity of the air, and the use of [a] lake for nesting and feeding by birds.” (*Id.* at p. 435.)

14 The doctrine also extends to groundwater and its effects on public trust resources.
15 (*Environmental Law Foundation v. State Water Resources Control Bd.* (2018) 26 Cal.App.5th
16 844, 859.) The court in *Environmental Law Foundation* found a duty to consider any adverse
17 impacts groundwater extraction would have on a public trust resource. (*Id.* at 863.) The duty, the
18 court found, was not to regulate but to consider the impact on the public trust resource and, where
19 feasible, to preserve the public interest in its resources. (*Ibid.*) Therefore, before state courts and
20 agencies approve water diversions or water uses, they must consider the effect of such use upon
21 interests protected by the public trust, and attempt, so far as feasible, to avoid or minimize any
22 harm to those interests. (*National Audubon Society v. Superior Court, supra*, 33 Cal.3d at p. 426.)

23 Further, the public trust doctrine imposes a duty of continuing supervision over the taking
24 and use of water affecting the trust resources. (*National Audubon Society v. Superior Court,*
25 *supra*, 33 Cal.3d at p. 447.) In exercising its sovereign power to protect water resources in the
26 public interest, the state, or court, is not confined by past water allocation decisions which may be
27 incorrect in light of current knowledge or inconsistent with current needs. (*Ibid.*) In other words,
28 this court must continually take into consideration groundwater pumping’s effects on public trust

resources such as endangered species and riparian habitat.

D. The Past and Continuing Harm to Public Trust Resources in this Basin

Declining groundwater levels have caused widespread mortality within the stands of cottonwood, mesquite, and willows at Camp Cady and throughout the Mojave River. (Johnson Decl. at ¶ 27.) Notwithstanding these losses, Camp Cady still contains valuable riparian vegetation. (*Ibid.*) A total of 106 bird species have been documented using riparian vegetation at Camp Cady, including multiple species listed as endangered under the California Endangered Species Act (CESA) and the federal Endangered Species Act (ESA). (*Ibid.*) Habitat with a cottonwood and willow canopy and a mesquite understory had the highest abundance of birds of all habitat types at the wildlife area. (*Ibid.*)

Camp Cady was acquired to protect the surface water and associated riparian habitats. (Johnson Decl. at ¶ 28.) When running and pooled surface water was present, cottonwoods and willows were abundant with a dense understory of mesquite. (*Ibid.*) According to Department records, the Mojave River typically surfaced in the center of Camp Cady and generally flowed from late October to August. (*Ibid.*) These surface flows later ceased because of the declining groundwater levels and have not returned except for rare large storm events typically occurring in the winter months. (*Ibid.*)

The groundwater dependent habitats along the Mojave River have undergone significant environmental change due to groundwater drawdown, causing the death of deep-rooted, native vegetation and the reactivation of wind-blown sand. (Johnson Decl. at ¶ 31.) Although widespread, these impacts have been most significant in Baja and Camp Cady where the loss of groundwater storage has been the most pronounced and where the Department has devoted the most attention due to the Department's land ownership. (*Ibid.*) Groundwater levels continue to exceed the critical depth of seven feet needed to sustain a healthy riparian forest. (*Ibid.*) As a result, riparian vegetation such as cottonwood and willows get scoured during large flood events and their seedlings can no longer get established due to the lowered ground water table. (*Ibid.*)

Therefore, it is critical that the Watermaster and this Court take these public trust needs into account whenever setting the yearly FPA. As long as groundwater levels in the subareas

1 continue to exceed the critical depth of seven feet needed for a healthy habitat, then doing
2 anything aside from maintaining FPA at current levels or even ramping the FPA down further is
3 contrary to the Judgment and will harm the public trust resources in the Basin.

4 In addition, while the Department supports the Watermaster's recommendation regarding
5 FPA this Water Year, the process presented in the Watermaster Engineer's declaration does not
6 adequately address the Exhibit H wells, rather the analysis relies primarily on identification of
7 stabilization of groundwater levels. (Declaration of James Blanke In Support of the Department's
8 Response to Watermaster's Motion to Adjust Free Production Allowance for the 2025-2026
9 Water Year (Blanke Decl.) at ¶ 9.) To show how public trust resources are considered in the
10 process of developing FPA values, the Department recommends that a comparison of measured
11 water levels and water table standards be incorporated into future analyses, along with how that
12 comparison relates to the recommended FPA. (*Ibid.*) Comparison of observed groundwater
13 levels at the Table H-2 wells to the water table standards is important as these standards have
14 typically not been met. (*Id.* at ¶ 10.) Analysis of available groundwater level data through
15 October 2024 shows the standards were met at the following rates: H1-1: 1%, H1-2 (original
16 location, through February 2005): 100%, H1-2 (current location, assuming a 2,762' threshold):
17 53%, H2-1: 64%, H3-1: 0%, H3-2, 0%. (*Ibid.*) Therefore, it is clear that the public trust
18 resources in the Basin are currently stressed and with the H1, H2 and H3 levels not being met
19 most of the time, we will continue to see the destruction of most of the riparian habitat in the
20 Basin.

21 ARGUMENT

22 I. THE EVIDENCE SUBMITTED BY THE WATERMASTER ENGINEER TO 23 THE WATERMASTER BOARD AND THIS COURT FOR WATER YEAR 24 2025-2026 SUPPORTS MAINTAINING FPA FOR THE BAJA, ALTO AND CENTRO SUBAREAS AT THEIR 2024-2025 WATER YEAR LEVELS

25 For the 2025-2026 Water Year, the evidence submitted by the Watermaster Engineer,
26 including his Declaration attached to the 2025-2026 Rampdown Motion, the Watermaster's most
27 recent Annual Report, and the presentations made by the Watermaster Engineer to the
28 Watermaster Board indicate that maintaining FPA in Baja, Alto and Centro at their 2024-2025

1 Water Year levels is warranted. For the Centro and Baja Subareas, the Watermaster Engineer
2 recommends waiting for the new Regional Mojave River Basin Model (RMBM) before making
3 any changes to FPA in those 2 subareas. The not yet completed RMBM, if created and analyzed
4 correctly, will provide much more information to assist in setting PSY and FPA in those 2
5 subareas. (2025-2026 Rampdown Motion Exhibit C at p. 17.) In addition, the Alto Subarea's
6 water use has not changed meaningfully in the last year and Alto is still pumping at least 17,000
7 acre-feet per year more than the PSY for the subarea, so maintaining the FPA for 2025-2026
8 Water Year at the same amount as last Water Year is warranted. The Department agrees.

9 **II. THE DEPARTMENT SEEKS TO WORK WITH THE WATERMASTER TO**
10 **EVALUATE AND PREPARE THE RMBM**

11 In addition to the Department's opinion regarding the proposed changes to FPA in the
12 WY 2025-2026 FPA, the Department has the following recommendations and conclusions
13 regarding the RMBM that must be put in place before the model can be used to change the
14 current approach to the Mojave River Basin: 1) Transparency and coordination is critical to
15 development of the RMBM. Transparency and coordination improves model results through
16 incorporation of data and knowledge held by others. Further, early and frequent coordination can
17 identify model issues early, allowing for model refinements. Early identification and correction of
18 issues in the RMBM is important as the 2025 Wagner Declaration indicates that the RMBM is
19 "expected to be used for the next Watermaster cycle for determining PSY in Alto, Centro, Oeste
20 and Baja;" 2) Given the importance of the RMBM in its intended future use, the Department
21 recommends allowing for a complete review of the RMBM by the Department and other
22 stakeholders, with at least a six month review period. To support this review, all model input and
23 output files along with associated reports detailing the model development and calibration process
24 should be provided; 3) The RMBM should use the best available data. This includes the use of
25 the Barstow streamflow gauge data. Given that there are no other stream gauges in the area, data
26 from this gauge remains the best available data for streamflow, even with the level of uncertainty
27 indicated by the USGS. A more thorough understanding of potential issues with the data from the
28 gauge can inform how to best use the data in the calibration of the RMBM. For instance, the

1 gauge may be more accurate at identifying periods of no flow, low flow, or high flow; 4) The
2 hydrologic base period should be consistent with management across the different subareas. The
3 proposed hydrologic base period (2001-2020) in the 2025 Wagner Declaration, is likely more
4 representative of present climatic and cultural conditions than the current hydrologic base period.
5 While the Department is supportive of updating the hydrologic base period, as part of moving to
6 the new base period, the Department recommends the Watermaster take into consideration
7 changes in streamflow due to recharge induced by lowered groundwater levels. Absent this
8 consideration, the proposed base period will increase PSY within upper Alto due to increased
9 recharge occurring due to lower groundwater levels. It will also reduce PSY within Centro and
10 Baja as the proposed base period reduces recharge in these areas due to the additional streamflow
11 losses in upper Alto. The RBM may provide a tool to quantify these impacts, supporting
12 associated adjustments; 5) finally, the hydrologic base period should be consistent with protection
13 of riparian habitat. (Blanke Decl. at ¶ 13A-E.)

14 As previously noted, the proposed hydrologic base period (2001-2020) in the 2025
15 Wagner Declaration, is likely more representative of present climatic and cultural conditions.
16 However, more recent cultural conditions include a decline in the acreage and health of riparian
17 habitat. (*Ibid.*). This decline in acreage and health of riparian systems results in less consumptive
18 water use by vegetation. (*Ibid.*). However, the Judgment is intended to be protective of these
19 systems, and this loss should not be considered permanent or available for other uses.

20 CONCLUSION

21 For the foregoing reasons, the Department respectfully requests that the Court 1) set the
22 FPA in the Baja Subarea at 19.5% of BAP for the 2025-2026 water year; 2) set the FPA in the
23 Alto Subarea at 50.4% of BAP for the 2025-2026 water year; and 3) set the FPA in the Centro
24 Subarea at 56% of BAP for the 2025-2026 Water Year. In addition, the Department requests that
25 the Watermaster be ordered to comply with the requirement in the Exhibit H in the Judgment to
26 take into account the harm to public trust resources of any future decisions to ramp up or keep
27 steady any FPA in the various subareas, including taking into account whether groundwater levels
28 are meeting the requirements set out in Exhibit H, including the Exhibit H monitoring wells.

1 Finally, the Department requests that the Court order the Watermaster to comply with the
2 Department's recommendations regarding the RMBM.

3
4 Dated: July 22, 2025

Respectfully submitted,

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DECLARATION OF SERVICE BY E-MAIL AND OVERNIGHT COURIER

Case Name: **City of Barstow v. City of Adelanto, et al.**

Case No.: **CIV208568 (Lead)**

I declare: I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter; my business address is: 300 South Spring Street, Suite 1702, Los Angeles, CA 90013-1230. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for overnight mail with the **Federal Express** courier service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the overnight courier that same day in the ordinary course of business.

On July 22, 2025, I served the **CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE'S MEMORANDUM OF POINTS AND AUTHORITIES IN RESPONSE TO WATERMASTER'S MOTION TO ADJUST FREE PRODUCTION ALLOWANCE FOR WATER YEAR 2025-2026** by transmitting a true copy via electronic mail. In addition, I placed a true copy thereof enclosed in a sealed envelope, in the internal mail system of the Office of the Attorney General, for overnight delivery, addressed as follows:

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I declare under penalty of perjury under the laws of the State of California and the United States of America, the foregoing is true and correct and that this declaration was executed on July 22, 2025, at Los Angeles, California.

Beatriz Davalos
Declarant


Signature

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 July 22, 2025, 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:

- **California Department of Fish and Wildlife's Memorandum of Points and Authorities in Response to Watermaster's Motion to Adjust Free Production Allowance for Water Year 2025-2026**

 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 July 22, 2025 at Apple Valley, California.



Jeffrey D. Ruesch

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(michael.lemke@dot.ca.gov;
Donald.Larson@dot.ca.gov)
California Department Of Transportation (via
email)
175 W. Cluster
San Bernardino, CA 92408-1310

Attn: Catalina Elias
(cfernandez@calportland.com)
CalPortland Company - Oro Grande Plant (via
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P. O. Box 146
Oro Grande, CA 92368-0146

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Mojave Basin Area Watermaster Service List as of July 22, 2025

Attn: Denise Parra
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Attn: Danielle Stewart
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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: San Bernardino Co Regional Parks
CDFW - Mojave Narrows Regional Park
268 W. Hospitality Lane, Suite 303
San Bernardino, CA 92408-3241

Attn: Paco Cabral
(paco.cabral@wildlife.ca.gov;
askregion6@wildlife.ca.gov;
aaron.johnson@wildlife.ca.gov)
CDFW - Mojave River Fish Hatchery (via
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12550 Jacaranda Avenue
Victorville, CA 92395-5183

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16888 North E. Street
Victorville, CA 92394-2999

Attn: Jennifer Cutler
Center Water Company
P. O. Box 616
Lucerne Valley, CA 92356-0616

Attn: Nancy Ryman
Chamisal Mutual Water Company
P. O. Box 1444
Adelanto, CA 92301-2779

Attn: Carl Pugh (talk2betty@aol.com;
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Agua Dulce, CA 91390-4577

Contratto, Ersula
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9860 Gidley St.
El Monte, CA 91731-1110

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Crystal Lakes Property Owners Association
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Mojave Basin Area Watermaster Service List as of July 22, 2025

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44579 Temescal Street
Newberry Springs, CA 92365

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Desert Girlz LLC (via email)
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Lucerne Valley, CA 92356-0709

Attn: Denise Courtney
Desert Springs Mutual Water Company
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Attn: Debby Wyatt
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Apple Valley, CA 92307-5525

Attn: Judith Dolch-Partridge, Trustee
Dolch Living Trust Robert and Judith
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16736 B Road
Delta, CO 81416-8501

Attn: Virginia Shaw
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Gabrych Family Trust dated October 9, 2007
2006 Old Highway 395
Fallbrook, CA 92028

Gabrych Family Trust dated Octobner 9, 2007
2006 Old Highway 395
Fallbrook, CA 92028-8816

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Mojave Basin Area Watermaster Service List as of July 22, 2025

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160 Via Verde, Ste. 100
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Calimesa, CA 92320-1301

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41717 Silver Valley Road
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Attn: William Handrinos
Handrinos, Nicole A.
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Mojave Basin Area Watermaster Service List as of July 22, 2025

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Helendale, CA 92342-0249

Attn: Jeff Gallistel
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9700 7th Avenue
Hesperia, CA 92345-3493

Attn: Jeremy McDonald
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Hesperia, City of (via email)
9700 Seventh Avenue
Hesperia, CA 92345-3493

Attn: Carabeth Carter ()
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Ehrenberg, AZ 85334-0455

Attn: Lisset Sardeson
Hi Desert Mutual Water Company
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Barstow, CA 92311

(lechiatt@hotmail.com)
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17671 Bear Valley Road
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Hilarides 1998 Revocable Family Trust
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Newberry Springs, CA 92365

Attn: Katherine Hill (Khill9@comcast.net)
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84 Dewey Street
Ashland, OR 97520-

Attn: Anne Roark
Hitchin Lucerne, Inc.
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Ho, Ting-Seng and Ah-Git
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Mission Viejo, CA 92691-

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Denver, CO 80202-1348

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Attn: Sandra D. Hood
Hood Family Trust
2142 W Paseo Del Mar
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Attn: Barry Horton
Horton Family Trust
47716 Fairview Road
Newberry Springs, CA 92365-9258

Attn: Ester Hubbard
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39392 Burnside Loop
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Mojave Basin Area Watermaster Service List as of July 22, 2025

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Attn: Lawrence Dean
Jackson, Ray Revocable Trust No. 45801
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Attn: Tomas Janovsky
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Encino, CA 91316-1437

Attn: Gary A. Ledford
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Jess Ranch Water Company (via email)
906 Old Ranch Road
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Attn: Cynthia Mahoney
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Attn: Paul Johnson
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Johnson, Paul - Industrial (via email)
10456 Deep Creek Road
Apple Valley, CA 92308-8330

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Dammeron Valley, UT 84783-5211

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Johnston, Harriet and Johnston, Lawrence W.
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Hesperia, CA 92340-1472

Attn: Magdalena Jones
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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
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Attn: Ray Gagné
Jubilee Mutual Water Company
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Attn: Jilin Xiao
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19 Pemberly
Irvine, CA 92603-3452

Attn: Daniel Smith (dsmith@jrcwd.org)
Juniper Riviera County Water District (via email)
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Chino, CA 91710-

(Robertkasner@aol.com)
Kasner, Robert (via email)
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Mojave Basin Area Watermaster Service List as of July 22, 2025

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Liang, Yuan - I and Tzu - Mei Chen
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Mojave Basin Area Watermaster Service List as of July 22, 2025

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