

In the matter of Proposed Revocation of License 659 Hearing, Morongo Band of Mission Indians, Millard Canyon in Riverside County

I, Mozafar Behzad, declare as follows:

1. I am a civil engineer and past owner of BEK Consulting Engineers, located in Redlands, California. I have a Bachelor of Science degree from CalPoly and a master's degree in Public Administration from USC.

2. I helped Ferydoun and Doris Ahadpour, who owned water right license 659. The Ahadpours purchased the property in 1991 and the water right license was formally assigned to the Ahadpours in 1994. The Ahadpours sold the property to Great Springs of America in June, 2001. During the years of Ahadpour's ownership (1991-2000), I represented them for certain aspects of activities related to the property and the license change petition application. During this time period the water from license 659 was not used and we did not do much with the property.

3. In June of 1995, I submitted a Petition to the Division of Water Rights requesting a change of the purpose of use to drinking (commercial or industrial use) through bottling or some other method. The water right license 659 was designated for agricultural use; however, since the Ahadpour's ownership in 1991 there had never been any agricultural activities on the property that the water could be used for. From 1991 through 1999, the water was being completely wasted and ran down along Millard Canyon.

4. We were interested in marketing drinking water and were investigating various alternatives including building a water treatment facility, a pipeline to transport water to a treatment facility or trucking the water to a facility.

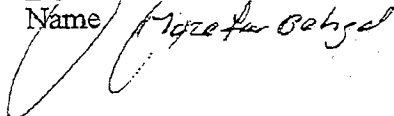
5. I visited the property occasionally, primarily to work with the Department of Health Services in testing the water quality of the springs. A state inspector needed to determine whether it was natural or artesian. I remember during one visit seeing evidence of cattle around the spring. The Ahadpours had no lease with any party to graze cattle on their property.

6. We were unable to move forward with any project in part because the Morongo Tribe would not grant the necessary easement across its property. The Ahadpours eventually sold the property in 2000.

7. During the time period of Ahadpour's ownership, the land use of the area at the point of diversion, immediately downstream of the diversion, and at the place where water was to be used was completely vacant and there were not actual agricultural activities occurring.

I declare under penalty of perjury that to the best of my knowledge the foregoing is true and correct. Executed on this 23 day of April in Redlands, California.

Name


Mozafar Behzad