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10 Attorneys for Cross-Defendant/Cross-Complainant,
11 ANTELOPE VALLEY UNITED MUTUALS GROUP; and
12 Cross-Defendants, ADAMS BENNETT INVESTMENTS, LLC;
13 MIRACLE IMPROVEMENT CORPORATION dba GOLDEN
14 SANDS MOBILE HOME PARK, aka GOLDEN SANDS TRAILER
15 PARK, named as ROE 1121; ST. ANDREW'S ABBEY, INC., named
16 as ROE 623; SERVICE ROCK PRODUCTS, L.P.; and SHEEP
17 CREEK WATER COMPANY, INC.

18 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
19 **IN AND FOR THE COUNTY OF LOS ANGELES**

20 Coordination Proceeding
21 Special Title (Rule 1550(b))

22 **ANTELOPE VALLEY GROUNDWATER**
23 **CASES**

24 Including Consolidated Actions:

25 _____
26 AND RELATED ACTIONS.

) Judicial Council Coordination
) Proceeding No. 4408; Santa Clara Case No. 1-
) 05-CV-049053
) Assigned to the Honorable Jack Komar
) Department 17C

) **DECLARATION OF ROBERT A.**
) **KRIEGER IN SUPPORT OF SAINT**
) **ANDREW'S ABBEY, INC., TEJON**
) **RANCHCORP/TEJON RANCH**
) **COMPANY'S AND U.S. BORAX INC.'S**
) **OPPOSITION BRIEF IN RESPONSE TO**
) **WILLIS CLASS' BRIEF REGARDING**
) **EXPORT OF GROUNDWATER PUMPED**
) **FROM NATIVE SAFE YIELD BY**
) **CERTAIN STIPULATING PARTIES**

)
)
) For Court's Use Only:
) Santa Clara County; Case No. 1-05-CV-049053
) (For E-Posting/E-Service Purposes Only)

)
)
) Date: October 13, 2015
) Time: 10:00 a.m.
) Dept. LASC – Stanley Mosk
) Prove-Up Trial Date: September 28, 2015

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DECLARATION OF ROBERT A. KRIEGER, P.E.

I, Robert A. Krieger, declare as follows:

1. I, Robert A. Krieger, P.E., am the Chairman of the Board of the engineering consulting firm of Krieger & Stewart, Inc. I am a California licensed professional engineer (RCE 15255) practicing in the field of Civil Engineering including water rights and surface and groundwater hydrology. Krieger & Stewart is under contract to St. Andrew’s Abbey, Inc. (“Abbey”) in connection with this matter, and is a designated expert witness for the Abbey.

2. I make this declaration in support of *Saint Andrew’s Abbey, Inc., Tejon Ranchcorp/Tejon Ranch Company’s And U.S. Borax Inc.’s Opposition Brief In Response To Willis Class’ Brief Regarding Export Of Groundwater Pumped From Native Safe Yield By Certain Stipulating Parties*. I have personal knowledge of the facts set forth in this declaration, except as to those facts stated on information and belief and, as to those, I am informed and believe them to be true. If called as a witness, I could and would competently testify to the matters stated herein.

3. The map attached as Exhibit “B” to the Declaration of Michael Duane Davis, filed concurrently herewith, which I am informed and believe was admitted into evidence during the Phase 4 Trial as part of “4-StAndrews-1” and entitled “Saint Andrew’s Abbey Land Ownership” dated March 2, 2012 (“Abbey Map”), was prepared by my office, under my supervision and direction. The Abbey Map shows, in thick green lines on the map, the Abbey’s parcels according to Los Angeles County Assessor numbers, which was depicted in alignment with United States Geological Survey topographic data. The Abbey Map superimposes the Adjudication Area jurisdictional boundary determined by the Court in the Phase 1 Trial, as depicted by the thick blue lines.

4. As reflected in the Abbey Map, the vast majority of the Abbey’s property is located within the Adjudication Area. The Adjudication Area boundary is inclusive of the alluvial soils and topographical conditions; as such, and meanders in, around and through the

1 Abbey’s contiguous approximately 1,878-acre property located high on the north slope of the
2 San Gabriel Mountains, near Valyermo, California. In general, the lower elevation alluvial areas
3 of St. Andrew’s property fall within the Adjudication Area boundary, whereas the higher
4 elevation areas that do not contain alluvial materials, are not included within the Adjudication
5 Area boundary.

6 5. All of St. Andrew’s’ property is situated within the watershed of the Basin, which
7 is depicted by the dark green line labeled “Boundary of the Antelope Valley Watershed
8 Contributory to the Antelope Valley Groundwater Basin” in Exhibit 9 to the Proposed Judgment.

9 6. Water utilized on the higher elevations of the Abbey’s property, which is not fully
10 consumed and does not evaporate, runs down gradient to the portions of the Abbey’s property
11 lying within the Adjudication Area. As such, all of the water produced by the Abbey and used
12 on its property remains within the watershed of the Basin.

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 06 day of October, 2015, at Riverside, California.


ROBERT A. KRIEGER, P.E.

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PROOF OF SERVICE
STATE OF CALIFORNIA, COUNTY OF SAN BERNARDINO

Re: *ANTELOPE VALLEY GROUNDWATER CASES*
Los Angeles County Superior Court Judicial Council Coordinated
Proceedings No. 4408; Santa Clara County Superior Court Case No. 1-05-CV-049053

I am employed in the County of San Bernardino, State of California. I am over the age of 18 years and not a party to the within action; my business address is: 550 East Hospitality Lane, Suite 300, San Bernardino, CA 92408-4205.

On October 13, 2015, I served the foregoing document(s) described **DECLARATION OF ROBERT A. KRIEGER IN SUPPORT OF SAINT ANDREW'S ABBEY, INC., TEJON RANCHCORP/TEJON RANCH COMPANY'S AND U.S. BORAX INC.'S OPPOSITION BRIEF IN RESPONSE TO WILLIS CLASS' BRIEF REGARDING EXPORT OF GROUNDWATER PUMPED FROM NATIVE SAFE YIELD BY CERTAIN STIPULATING PARTIES** on the interested parties in this action in the following manner:

(X) **BY ELECTRONIC SERVICE** – I posted the document(s) listed above to the Santa Clara County Superior Court website, <http://www.scefiling.org>, in the action of the Antelope Valley Groundwater Cases,

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on October 13, 2015, at San Bernardino, California.



DINA SNIDER