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6 Attorneys for SCI California Funeral Services, Inc.,
a California corporation dba Joshua Memorial Park
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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **IN AND FOR THE COUNTY OF LOS ANGELES**
10

11 Coordination Proceeding) Judicial Council Coordination
12 Special Title (Rule 1550(b))) Proceeding No. 4408
13)
14 **ANTELOPE VALLEY**) Santa Clara Case No. 1-05-CV-049053
15 **GROUNDWATER CASES**) Assigned to the Honorable Jack Komar
16) Department 17C
17 Including **Consolidated** Actions:)
18 **Los Angeles County Waterworks District**) **DECLARATION OF JASON COLEMAN,**
19 **No. 40 v. Diamond Farming Co.**) **P.E. IN SUPPORT OF SCI CALIFORNIA**
20 Superior Court of California, County of Los) **FUNERAL SERVICES, INC., A**
21 Angeles, Case No. BC 325 201) **CALIFORNIA CORPORATION DBA**
22) **JOSHUA MEMORIAL PARK'S MOTION**
23) **TO INTERVENE IN JUDGMENT**
24 **Los Angeles County Waterworks District**)
25 **No. 40 v. Diamond Farming Co.**) [Notice of Motion and Motion to Intervene;
26 Superior Court of California, County of) Declaration of Christopher Twitchell;
27 Kern, Case No. S-1500-CV-254-348) Declaration of Derek R. Hoffman; and
28) [Proposed] Order filed concurrently]
29 **Wm. Bolthouse Farms, Inc. v. City of**)
30 **Lancaster**) Date: November 7, 2019
31 **Diamond Farming Co. v. City of**) Time: 9:00 a.m.
32 **Lancaster**) Judge: Hon. Jack Komar, Judge
33 **Diamond Farming Co. v. Palmdale**)
34 **Water Dist.**)
35) **[Hearing to be conducted by Courtcall]**
36 Superior Court of California, County of)
37 Riverside, consolidated actions, Case Nos.)
38 **RIC 353 840, RIC 344 436, RIC 344 668**)
39)
40 **AND RELATED ACTIONS.**)
41)
42)

1 I, Jason Coleman, declare as follows:

2 1. I am a Supervising Engineer at Luhdorff & Scalmanini Consulting Engineers
3 (“LSCE”). I am a California registered professional civil engineer (C78366) practicing in the
4 field of civil engineering, including water rights and surface and groundwater hydrology. A
5 copy of my CV is attached hereto as Exhibit “1.” I give this Declaration in Support of SCI
6 California Funeral Services, Inc., a California corporation dba Joshua Memorial Park’s (“Joshua
7 Memorial”) Motion to Intervene in Judgment (“Motion”) filed concurrently herewith. LSCE is
8 under contract to Joshua Memorial, in connection with the Motion, in which capacity I have
9 directed, developed and overseen an analysis of Joshua Memorial’s groundwater supply system
10 and a professional estimate and opinion of its historic groundwater production for its cemetery
11 property located at 808 East Lancaster Blvd., Lancaster, CA 93535. In developing the analysis
12 and estimate, I have reviewed the records and data for Joshua Memorial, overseen an LSCE site
13 visit and physical inspection of the Joshua Memorial property and groundwater supply system,
14 and evaluated information provided to me by Joshua Memorial. I have personal knowledge of
15 the facts set forth in this declaration, except as to those facts stated on information and belief
16 and, as to those, I am informed and believe them to be true. If called as a witness, I could and
17 would competently testify to the matters stated herein.

18 2. Joshua Memorial submitted a 345-page Production Application to the
19 Watermaster dated June 11, 2019. Included within that Production Application is a written
20 report prepared by LSCE comprising my analysis of Joshua Memorial’s groundwater supply
21 system and estimated volume of historical groundwater production (“LSCE Report”). A true and
22 correct copy of the LSCE Report is attached as Exhibit “1” to the Declaration of Derek R.
23 Hoffman at pages 13-266, filed concurrently herewith.

24 3. Based upon the records and information that I have reviewed and believe to be
25 true and accurate, and as described in the LSCE Report, the approximately forty-acre Joshua
26 Memorial property includes an approximately twenty-one-acre cemetery, an approximately two-
27 acre mortuary building and parking lot, a residential home at the southeast corner of the property,

1 a mobile home at the western side of the property, and approximately sixteen acres of future
2 cemetery grounds. Joshua Memorial uses water for three primary purposes. The majority use is
3 for irrigation of the cemetery grounds, which includes turf, various trees and shrubs and other
4 vegetation, all supplied by the groundwater well. No water appears to have been used on the
5 approximately sixteen acres of future cemetery grounds. The mortuary and a residential home on
6 the property receive municipal water service and do not rely on water supplied from the well.

7 4. Based upon my examination of Joshua Memorial's groundwater production
8 system and the information provided to me by Joshua Memorial, I am informed and believe that
9 the groundwater well serving the property ceased operating in approximately April 2018 due to
10 what appears to be a drop in the groundwater to a level below the well screen. I am further
11 informed and believe that the irrigation well pump was not equipped with a flowmeter or
12 totalizer before the well ceased operating.

13 5. LSCE conducted a physical inspection of the property and groundwater supply
14 system. Based upon that inspection, Southern California Edison electrical utility usage
15 associated with the well pump operation, similar and/or corresponding product and technical
16 datasheets for the groundwater well pump equipment components, the assumed typical manner
17 in which similar groundwater well pumps are designed and operated in accordance with proper
18 hydraulic principles, and other factors identified in the LSCE Report, it is my professional
19 opinion that Joshua Memorial's historical annual groundwater production has ranged between
20 approximately 91 AFY to 147 AFY. Furthermore, assuming the total dynamic head conditions
21 present during operation of the well pump coincided (on average) with the best efficiency point
22 for the well pump curve, it is my professional opinion that Joshua Memorial's groundwater
23 historic annual production is estimated at approximately 122 AFY. The supporting analysis for
24 this estimate is detailed in the LSCE Report.

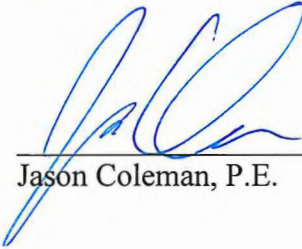
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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Dated this 10th day of October, 2019 at Woodland, California.



Jason Coleman, P.E.

EXHIBIT 1



Specialization

Ten years' experience in well pump station, water distribution and water treatment design and related construction management. Experience includes engineering design of vertical turbine and submersible deep well pumps, booster pumps, pipeline distribution systems, storage tanks, surface water and ground water treatment facilities including preparation of engineering drawings and specifications for construction. Knowledge of telemetry and instrumentation, controls, and programming logic of chemical treatment and pumping systems. Construction management inspection services performed for numerous well pump station, pipeline, water treatment and storage tank projects including direction in construction meetings, development of agendas and meeting minutes. Provided technical review and management of payment applications, submittals, RFIs, change orders and record drawings. Experience with regulatory agencies includes preparation of water supply permits, drinking water source assessments, water use permits, system operation plans and emergency response plans, TMF reports and CEQA studies.

Representative Professional Assignments

Preparation of civil, mechanical drawings and technical specifications, technical assistance in review and management of project records and submittals and inspection services conducted during construction for the following projects:

AKT Santa Nella Investors LLC, Nunes Well Production Review, Santa Nella, California: Provided an impartial investigation of the existing groundwater well construction, water level records, hydraulic conditions, pumping test data, electrical records, and well pump operator feedback to estimate the range of instantaneous production flowrates from an existing agricultural well. The project also required a review and critique of documents previously provided by the existing landowner which asserted a specific range of groundwater production capabilities. Completed independent hydraulic calculations and prepared as supporting letter with an independent estimate of instantaneous seasonal well pump flow rates as well as annual total well pump production estimates for the client's consideration of purchasing the well and surrounding property.

Well Pump Stations A, B, C, Santa Clara Valley Water District, Campbell, CA - Provided construction administration including field site inspections, technical review of RFIs, change orders, and submittals for construction of three well pump stations including two deep well submersible pumps rated at 1,200 gpm and one vertical turbine pump rated at 1,200 gpm. Performed pump station startup activities and assisted with development of new SCADA system.



EDUCATION

B.S., Civil and Environmental Engineering
Minor, Atmospheric Science
University of California
Davis, CA 2008

PROFESSIONAL REGISTRATION

CA Registered Professional Civil Engineer #78366

PROFESSIONAL EXPERIENCE

Luhdorff and Scalmanini,
Consulting Engineers Inc.,
Woodland, CA
Supervising Engineer 2019 - Present
Senior Engineer 2018 - 2019
Project Engineer 2011 - 2017
Staff Engineer 2008 - 2011

Kaweah Construction Company,
Sacramento, CA
Engineering Intern 2007 - 2008

PROFESSIONAL AFFILIATIONS

American Society of Civil Engineers #497173
American Water Works Association #01179332
Groundwater Resources Agency #4497
American Council of Engineering Companies (ACEC)

Representative Professional Assignments (cont.)

Diana Park Avenue Well Pump Station, City of Morgan Hill, Morgan Hill, CA - Prepared design drawings and specifications and provided construction management of a new 900 gpm, 75 horsepower well pump station, provided onsite field testing, oversaw construction and provided field testing and start-up services.

Regional Intertie Project, Del Oro Water Company, Magalia, CA - Provided construction administration including field site inspections, technical review of RFIs, change orders, and submittals for construction of a 13,500 lineal feet of 16" PVC transmission line, a 350,000 gallon bolted steel transfer tank, a 300 gpm pressure clarifier/filter treatment system and new SCADA system. Performed water treatment system startup activities and assisted with development of new SCADA system.

Upper Dymond Storage Tank, Del Oro Water Company, Strawberry, CA - Prepared design drawings and specifications and provided construction management for a 164,000 gallon bolted steel storage tank and ringwall foundation, oversaw construction and provided onsite field inspections.

Stonecreek Well Pump Station, Diablo Water District, Oakley, CA - Prepared design drawings and specifications and provided construction management of a 2 MGD, 200 horsepower well pump station, provided onsite field testing, oversaw construction and provided field testing and start-up services. Directed weekly construction progress field meetings, provided technical review of RFIs, change orders, and submittals.

Transfer Tank Project, Clear Creek Community Services District, Happy Valley, CA - Prepared design drawings and specifications and provided construction management for a 350,000 gallon bolted steel transfer tank and ringwall foundation, oversaw construction and provided onsite field inspections.

Bodega Well Pump Station, City of Pittsburg, Pittsburg, CA - Prepared design drawings and specifications and provided construction management of a new 1,300 gpm, 100 horsepower well pump station, provided onsite field testing, oversaw construction and provided field testing and start-up services.

Mainline Replacement Project, Tanimura & Antle, Spreckels, CA - Prepared design drawings and specifications and provided construction management for installation of 2.2 miles of distribution piping with 6" and 8" mainlines including service connection tie-ins to approximately 400 customers, oversaw construction and provided onsite field inspections.

Water Meter & Backflow Installation Project, Tanimura & Antle, Spreckels, CA - Prepared design drawings and specifications and provided construction management for new installation of approximately 30 backflow preventer devices throughout the distribution system including installation of approximately 175 new water service meters, oversaw construction and provided onsite field inspections.

Water Master Plan, Millview County Water District, Ukiah, CA - Performed evaluation of water demand, source capacity and storage capacity of existing water system with approximately 1,600 service connections. Performed assessment of existing treatment system and distribution system and evaluated compliance with regulatory requirements.

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3 **PROOF OF SERVICE**
4 **STATE OF CALIFORNIA, COUNTY OF SAN BERNARDINO**

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

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

11 On October 11, 2019, I served the foregoing document(s) described **DECLARATION OF**
12 **JASON COLEMAN, P.E. IN SUPPORT OF SCI CALIFORNIA FUNERAL SERVICES,**
13 **INC., A CALIFORNIA CORPORATION DBA JOSHUA MEMORIAL PARK'S**
14 **MOTION TO INTERVENE IN JUDGMENT** on the interested parties in this action in the
15 following manner:

16 (X) **BY ELECTRONIC SERVICE** – I caused such document(s) listed above to be
17 electronically served, via One Legal, to all parties appearing on the Santa Clara County
18 Superior Court website, <http://www.scefiling.org>, in the action of the Antelope Valley
19 Groundwater Cases; proof of electronic-filing through One Legal is then printed and
20 maintained with the original documents in our office. Electronic service is complete at the
21 time of transmission. My electronic notification email address is
22 dina.snider@greshamsavage.com,

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

25 Executed on October 11, 2019 at San Bernardino, California.

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DINA M. SNIDER