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8 Attorneys for SCI California Funeral Services, Inc.,
9 a California corporation dba Joshua Memorial Park
10 and Mortuary

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **IN AND FOR THE COUNTY OF LOS ANGELES**

13 Coordination Proceeding) Judicial Council Coordination
14 Special Title (Rule 1550(b))) Proceeding No. 4408
15)
16 **ANTELOPE VALLEY**) Santa Clara Case No. 1-05-CV-049053
17 **GROUNDWATER CASES**) Assigned to the Honorable Jack Komar
18) Department 17C
19 Including **Consolidated** Actions:)
20 **Los Angeles County Waterworks District**) **DECLARATION OF JASON COLEMAN,**
21 **No. 40 v. Diamond Farming Co.**) **P.E. IN LIEU OF LIVE TESTIMONY IN**
22 Superior Court of California, County of Los) **SUPPORT OF SCI CALIFORNIA**
23 Angeles, Case No. BC 325 201) **FUNERAL SERVICES, INC., A**
24) **CALIFORNIA CORPORATION DBA**
25 **Los Angeles County Waterworks District**) **JOSHUA MEMORIAL PARK AND**
26 **No. 40 v. Diamond Farming Co.**) **MORTUARY'S GROUNDWATER**
27 Superior Court of California, County of) **PRODUCTION RIGHT EVIDENTIARY**
28 Kern, Case No. S-1500-CV-254-348) **PROVE-UP**
29) [Filed concurrently with Prove-Up Brief;
30 **Wm. Bolthouse Farms, Inc. v. City of**) Declaration of Christopher Twitchell;
31 **Lancaster**) Declaration of Derek R. Hoffman; Stipulation for
32 **Diamond Farming Co. v. City of**) Admission of Evidence in Support of Production
33 **Lancaster**) Right; and [Proposed] Order]
34 **Diamond Farming Co. v. Palmdale**)
35 **Water Dist.**) Date: February 5, 2021
36) Time: 9:00 a.m.
37 Superior Court of California, County of) Judge: Hon. Jack Komar, Judge
38 Riverside, consolidated actions, Case Nos.)
39 RIC 353 840, RIC 344 436, RIC 344 668)
40 **AND RELATED ACTIONS.**) **[Hearing to be conducted by Courtcall]**
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, relating to water rights and surface and groundwater resources. A
5 copy of my CV is attached hereto as **Exhibit “1.”** I give this Declaration in Lieu of Live
6 Testimony in Support of SCI California Funeral Services, Inc., a California corporation dba
7 Joshua Memorial Park and Mortuary’s (“Joshua Memorial”) Groundwater Production Right
8 Evidentiary Prove-Up, to establish Joshua Memorial’s Production Right claim pursuant to
9 Section 5.1.10 of the Judgment. LSCE is under contract to Joshua Memorial, in connection with
10 this matter, in which capacity I have directed, developed and overseen an analysis of Joshua
11 Memorial’s groundwater supply system and a professional estimate and opinion of its historic
12 groundwater production for its cemetery property located at 808 East Lancaster Blvd., Lancaster,
13 CA 93535.

14 2. In developing the analysis and estimate, I have reviewed the records and data for
15 Joshua Memorial, including the information in and documents attached to the Joshua Memorial
16 Verified Discovery Responses, the Declarations of Christopher Twitchell and Derek Hoffman in
17 Lieu of Live Testimony in Support of the Prove-Up Hearing, and the records previously
18 reviewed and attached to my Initial LSCE Report of June 11, 2019. I have overseen an LSCE
19 site visit and physical inspection of the Joshua Memorial property and groundwater supply
20 system, and evaluated information provided to me by Joshua Memorial. I have personal
21 knowledge of the facts set forth in this declaration, except as to those facts stated on information
22 and belief and, as to those, I am informed and believe them to be true. If called as a witness, I
23 could and would competently testify to the matters stated herein.

24 3. On June 11, 2019, Joshua Memorial submitted a 345-page Production Application
25 to the Watermaster. The Production Application included a written report prepared by LSCE
26 comprising my analysis of Joshua Memorial’s groundwater supply system and estimated volume
27 of historical groundwater production, based upon Southern California Edison electrical utility

1 information for years 2015-2019 (partial year) and upon additional records and information
2 pertaining to the well and pump system that was available at that time. (“Initial LSCE Report”).
3 A true and correct copy of the Initial LSCE Report is included within Exhibit “1” to the
4 Declaration of Derek R. Hoffman, specifically at pages 13-266, filed concurrently herewith.

5 4. LSCE has since prepared an updated analysis, in accordance with the Court’s
6 *Stipulation and Order for Discovery*, to include an evaluation of additional data received
7 following issuance of the Initial LSCE Report. The updated analysis expands on the previous
8 analysis with consideration of the newly obtained electrical usage data and SCE well pump
9 performance test reports from years 2000-2014. Supplemental information was also provided by
10 prior SCI management, the local pump contractor, and additional field pictures and related
11 information. A true and correct copy of the updated analysis, dated May 12, 2020, entitled, “*SCI*
12 *California Funeral Services, Inc. dba Joshua Memorial Park Irrigation Water Use Estimate*”
13 was included with the Joshua Memorial Verified Discovery Response Regarding Groundwater
14 Production Right Claim. For ease of reference, a true and correct copy of Updated LSCE Report
15 is attached instead directly to this declaration as **Exhibit “2”**.

16 5. Based upon the records and information that I have reviewed and believe to be
17 true and accurate, and as described in the Updated LSCE Report, the approximately forty-acre
18 Joshua Memorial property includes an approximately twenty-one-acre cemetery, an
19 approximately two-acre mortuary building and parking lot, a residential home at the southeast
20 corner of the property, a mobile home and maintenance shop at the western side of the property,
21 and approximately sixteen acres of future cemetery grounds.

22 6. Groundwater supplied by the well is used is for irrigation of the cemetery
23 grounds, which includes turf, various trees and shrubs and other vegetation. It is my professional
24 estimate that the acreage under irrigation with well water at Joshua Memorial’s property for each
25 year from 2000 through 2017 is estimated to be an average of approximately 19 acres. The
26 maximum estimated irrigated acreage during that timeframe is estimated to be approximately
27 21.4 acres in 2003, and the lowest estimated irrigated acreage during that timeframe is estimated

1 to be approximately 18.3 acres from 2004 to 2013. Starting in 2015 through 2017 there was a
2 smaller irrigated area south of mortuary building. This increased the irrigated area to 18.7 acres.
3 The mortuary and residential home on the property receive municipal water service and do not
4 rely on water supplied from the well.

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

11 8. LSCE conducted a physical inspection of the property and groundwater supply
12 system. Based upon that inspection, Southern California Edison electrical utility usage
13 associated with the well pump operation, similar and/or corresponding product and technical
14 datasheets for the groundwater well pump equipment components, the assumed typical manner
15 in which similar groundwater well pumps are designed and operated in accordance with proper
16 hydraulic principles, and other factors identified in the Updated LSCE Report, it is my
17 professional opinion that that the estimated range of 78 to 125 acre-feet per year is a realistic
18 approximation of the Joshua Memorial historical groundwater production from the irrigation
19 well from 2000 through 2017. Furthermore, assuming the total dynamic head conditions present
20 during operation of the well pump coincided (on average) with the best efficiency point for the
21 well pump curve, it is my professional opinion that Joshua Memorial's groundwater historic
22 annual production is estimated at approximately 103 AFY. The supporting analysis for this
23 estimate is detailed in the Updated LSCE Report.

24 9. According to information that I reviewed, the SCE electrical meter onsite
25 associated with the Joshua Memorial electrical utility usage invoices and data, tracks the
26 electrical usage of the irrigation well pump, maintenance shop and mobile home located on the
27 SCI property. The maintenance shop is used for storage of tools and material and is also used as

1 space for equipment repair. The maintenance shop is equipped with interior and exterior lighting,
2 electrical outlets, and an inoperable air conditioning unit. According to Joshua Memorial, the
3 electrical power supply to the air conditioning unit has been disconnected for years (the exact
4 time it was disconnected is unknown). Joshua Memorial indicates that the mobile home has not
5 been occupied since 2011 and has not drawn electricity since that time, during which Joshua
6 Memorial used the mobile home for extra storage space.

7 10. LSCE reviewed Joshua Memorial SCE electrical utility invoices from April 2018
8 through March 2019 to determine if any background electrical loads may have been present
9 independent of the well pump use. A generic example of background electrical load includes any
10 power use recorded by a meter such as lighting, metering equipment, pressure transmitter,
11 household appliance such as an air conditioning unit, or any other electrical load other than the
12 subject well pump motor. During the timeframe the Joshua Memorial irrigation well pump was
13 offline, the electrical usage was zero kilowatt-hours (kWh), confirming that no background
14 electrical loads were present. Although the electrical energy usage of the maintenance shop is
15 unknown prior to 2018, since April 2018 the electrical usage per the monthly SCE records was
16 zero kWh, suggesting the prior background electrical loads do not play a major factor in the total
17 electrical usage of the meter powering the well pump.

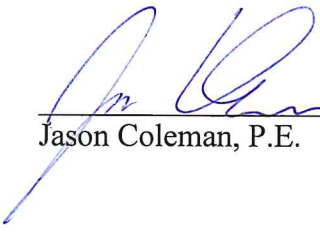
18 11. Southern California Edison (SCE) provides its own estimate of groundwater
19 pumpage in historical pump performance test records included within the records that I reviewed.
20 SCE's estimate assumes the pump operates at the tested flow rate, and the operating conditions
21 remain unchanged from the previous year, such as the electrical usage, operating hours,
22 discharge pressure, and water levels. SCE estimated the annual groundwater pumpage was 108.1
23 acre-feet in 1984, 167.5 acre-feet in 1988, and 115.2 acre-feet in 1990. The SCE annual
24 groundwater production estimates in 1984 and 1990 fall within LSCE's estimated production
25 range of 78 to 125 acre-feet per year.

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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 12th day of January, 2021 at Woodland, California.



Jason Coleman, P.E.

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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 January 14, 2021, I served the foregoing document(s) described **DECLARATION OF**
12 **JASON COLEMAN, P.E. IN LIEU OF LIVE TESTIMONY IN SUPPORT OF SCI**
13 **CALIFORNIA FUNERAL SERVICES, INC., A CALIFORNIA CORPORATION DBA**
14 **JOSHUA MEMORIAL PARK AND MORTUARY'S GROUNDWATER PRODUCTION**
15 **RIGHT EVIDENTIARY PROVE-UP** on the interested parties in this action in the following
16 manner:

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

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

26 Executed on January 14, 2021 at San Bernardino, California.

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DINA M. SNIDER