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EXEMPT FROM FILING FEES  
[Gov. Code, § 6103]

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 CLERK OF THE COURT

11  
12 **Coordination Proceeding  
13 Special Title (Rule 3.550(c))**

14 **ANTELOPE VALLEY GROUNDWATER  
15 CASES**

**Included Actions:**

16 **Los Angeles County Waterworks District  
17 No. 40 v. Diamond Farming Co.  
Superior Court of California County of Los  
18 Angeles, Case No. BC 325 201**

19 **Los Angeles County Waterworks District  
20 No. 40 v. Diamond Farming Co.  
Superior Court of California County of  
21 Kern, Case No. S-1500-CV-254-348**

22 **Wm. Bolthouse Farms, Inc. v. City of  
23 Lancaster, Diamond Farming Co. v. City of  
24 Lancaster, Diamond Farming Co. v.  
Palmdale Water Dist. Superior Court of  
California, County of Riverside,  
consolidated Actions, Case Nos. RIC 353  
840, RIC 344 436, RIC 344 668**  
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25 **AND RELATED ACTIONS.**  
26  
27  
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Judicial Council Coordination  
Proceeding No. 4408

Santa Clara Case No. 1-05-CV-049053

**SUPPLEMENTAL DECLARATION OF  
BLAINE LAUMBACH ON BEHALF OF  
STATE OF CALIFORNIA,  
DEPARTMENT OF WATER  
RESOURCES PURSUANT TO CASE  
MANAGEMENT ORDER FOR PHASE  
IV TRIAL**

[Assigned for All Purposes to the Honorable  
Jack Komar]

Trial Date: May 28, 2013  
Time: 1:00 pm  
Dept: 322

Action Filed: October 26, 2005

1 I, BLAINE LAUMBACH, declare as follows:

2 1. I have been employed by the Department of Water Resources (DWR) Southern Field  
3 Division, an agency of the State of California, one of the parties hereto, for more than thirty-three  
4 years. Currently, I am a Hydroelectric Plant Operations Superintendent. Since 2010, my duties  
5 in this position have included budgeting, planning, directing, organizing and controlling the  
6 Operations Branch and operational activities of facilities supplying water and/or power to various  
7 State Water Project (SWP) contractors in and out of the Southern Field Division. I am authorized  
8 to make this declaration for and on behalf of the DWR. If called as a witness, I could and would  
9 competently testify to each fact herein. On January 31, 2013, my declaration was filed with this  
10 Court. A copy is attached as Exhibit A.

11 2. To clarify my Declaration filed on January 31, 2013, and to specifically highlight the  
12 information sought by the Court on the groundwater pumping figures for 2011 and 2012, DWR  
13 pumped 54.05 acre-feet for the years of 2011 and 2012 for the State of California, Department of  
14 Water Resources. I provide a further explanation as follows:

15 A. DWR has three facilities where it pumps groundwater. In this declaration they  
16 are called the Oso complex, Alamo complex, and TEA Trailers. All three have wells, but the Oso  
17 complex is the specific facility/site where the groundwater pumping to protect the aqueduct liner  
18 protection takes place and where the bulk of the pumping occurs.

19 B. In addition to the aqueduct pumping, each of the above facilities pumps for  
20 domestic use and the Alamo complex uses water for cooling four air compressors at the  
21 pumping plant.

22 3. Alamo and TEA pumped .34 acre-feet of water per year in 2011 and 2012.

23 A. Alamo pumped .2 acre-feet per year in groundwater to cool air compressors at  
24 the pumping plant and .09 acre-feet of water per year for domestic use for toilets, faucets sinks,  
25 showers and hose bibs for a total of .29 acre feet. Paragraphs 75-79 in my January 31, 2013  
26 Declaration provides these calculations and Paragraph 36 provides a description of the pumping  
27 and uses. For the .09 domestic pumping, my Declaration relies on the DWR Senior Architect  
28 David Otto's estimates based on the number of staff present at the site.

1           B.    The TEA trailer site pumped .05 acre-feet for domestic use in 2011 and 2012.  
2 This amount is based on Dave Otto's estimate and is located at paragraph 80 of my January 31,  
3 2013 declaration.

4           4.    The Oso complex pumped 53.71 acre-feet of water per year of groundwater for  
5 aqueduct liner protection and domestic use in 2011 and 2012.

6           A.    The Oso complex has two wells that pump groundwater for aqueduct liner  
7 protection to the pumping plant for use to create pressure seals on equipment at the plant. The  
8 Oso pumping plant has software that tracks the start and stop times of each pump in the plant that  
9 is used for pressure seals.

10          B.    Based upon numbers provided from that software, i.e. how long each pump ran  
11 for, and the measured flow rate of the pump, I calculated that 14.97 acre-feet of water per year is  
12 used for pressure seals at Oso complex from groundwater. The calculations and information are  
13 in paragraphs 50-56 of my January 31, 2013 declaration.

14          C.    The Oso complex also has 10 additional pumps that pump groundwater directly  
15 into the Aqueduct itself for protection of the aqueduct liner. Staff from DWR has observed that  
16 about 6 pumps a day run for about 5 hours a day. I utilized very conservative numbers for the  
17 pumping rates of these pumps due to their age and I calculated that 38.28 acre-feet of water per  
18 year are used for this purpose. This information and calculations can be found in paragraphs 41-  
19 49 of my January 31, 2013 Declaration.

20          D.    The total calculations of groundwater pumped for aqueduct protection is 14.97  
21 acre feet plus 38.28 acre-feet for a total of: 53.25 acre-feet in 2011 and 2012.

22          E.    Finally, Oso complex pumped .46 acre-feet of water per year in 2011 and 2012  
23 for domestic use. I relied on figures from Dave Otto and this information is located at paragraphs  
24 64-67 of my January 31, 2013 Declaration.

25          5.    In total, Oso complex pumped groundwater in the amount of 53.71 acre-feet of water  
26 in 2011 and 2012. In paragraph 68 of my January 31, 2013 Declaration I incorrectly added only  
27 the 14.97 and the .46 acre-feet at the Oso complex for a total of 15.43 acre-feet of water at Oso,  
28 instead of the full 53.71. However, the total amount and calculations are present in the

1 paragraphs I cited above and adding all the groundwater figures used at the Oso complex above  
2 paragraph 68 provides the final correct number.

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

5 Executed this \_\_\_\_\_ day of May 29, 2013 at Pearblossom, California.

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BLAINE LAUMBACH

## CERTIFICATE OF SERVICE

Case Name: **Antelope Valley Groundwater  
Cases**

No. **JCCP 4408**

I hereby certify that on May 30, 2013, I electronically served the following document(s)

**SUPPLEMENTAL DECLARATION OF BLAINE LAUMBACH ON BEHALF OF  
STATE OF CALIFORNIA, DEPARTMENT OF WATER RESOURCES PURSUANT TO  
CASE MANAGEMENT ORDER FOR PHASE IV TRIAL**

on the interested parties in this action, by posting the document(s) listed above to the Santa Clara County Superior Court e-filing website (<http://www.scefiling.org>) under the Antelope Valley Groundwater matter pursuant to the Court's Order dated October 27, 2005.

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on May 30, 2013, at Los Angeles, California:

\_\_\_\_\_  
Blanca Cabrera  
Declarant

  
\_\_\_\_\_  
Signature