

1 KAMALA D. HARRIS  
Attorney General of California  
2 ERIC M. KATZ  
Supervising Deputy Attorney General  
3 MARILYN H. LEVIN (SBN 92800)  
NOAH GOLDEN-KRASNER (SBN 217556)  
4 300 South Spring Street, Suite 1702  
Los Angeles, CA 90013  
5 Telephone: (213) 897-2614  
Fax: (213) 897-2802  
6 E-mail: Marilyn.Levin@doj.ca.gov  
E-mail: Noah.Goldenkrasner@doj.ca.gov  
7 *Attorneys for State of California, Santa Monica  
Mountains Conservancy, and State of California  
8 50th District Agricultural Association*

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

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 COUNTY OF LOS ANGELES

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

14 **ANTELOPE VALLEY GROUNDWATER**  
15 **CASES**

16 **Included Actions:**

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

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

21 **Wm. Bolthouse Farms, Inc. v. City of**  
**Lancaster, Diamond Farming Co. v. City of**  
22 **Lancaster, Diamond Farming Co. v.**  
**Palmdale Water Dist. Superior Court of**  
23 **California, County of Riverside,**  
24 **consolidated Actions, Case Nos. RIC 353**  
**840, RIC 344 436, RIC 344 668**

25 -----  
26 **AND RELATED ACTIONS.**

Judicial Council Coordination  
Proceeding No. 4408

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

**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

OSC re: Approval of Stipulations:  
March 15, 2013

Time: 9:00 a.m.  
Dept: 1

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

10 2. I have held other positions with Southern Field Division. Between 2004 and 2010,  
11 I was Southern Field Division's Chief Hydroelectric Plant Operator, responsible for supervising  
12 the daily operations of the Southern California Area Control Center, Alamo Power Plant, Oso  
13 Pumping Plant and William E. Warne Power Plant.

14 3. I have held a number of other positions during my tenure with DWR. In my  
15 various positions, I have become extremely familiar with Southern Field Division's equipment  
16 and operations, including Southern Field Division's use of water. A true and correct copy of my  
17 resume is attached to this declaration as Exhibit A.

18 4. SWP Overview. The SWP is a water storage and delivery system of reservoirs,  
19 aqueducts, power plants and pumping plants. Its main purpose is to store water and distribute it to  
20 29 urban and agricultural water suppliers in Northern California, the San Francisco Bay Area, the  
21 San Joaquin Valley, the Central Coast, and Southern California. Of the contracted water supply,  
22 70 percent goes to urban users and 30 percent goes to agricultural users. SWP makes deliveries  
23 to two-thirds of California's population. It is maintained and operated by DWR.

24 5. SWP Size. Today, the SWP includes 34 storage facilities, reservoirs and lakes; 20  
25 pumping plants; four pumping-generating plants; five hydroelectric power plants; and about 701  
26 miles of open canals and pipelines. The SWP provides supplemental water to approximately 25  
27 million Californians and about 750,000 acres of irrigated farmland.

28 6. Southern Field Division manages the largest section of the SWP, serving eastern

1 Kern County and the Los Angeles, Riverside and San Bernardino areas. To bring water to the  
2 growth centers of Southern California, it operates two pumping plants, three power plants and  
3 five reservoirs. It also maintains 178 miles of the California Aqueduct (Aqueduct), the SWP's  
4 444-mile concrete artery. After crossing the Tehachapi Mountains, the Aqueduct enters the  
5 Southern Field Division at the Carley V. Porter Tunnel near Gorman and divides into two  
6 branches. The West Branch serves Los Angeles and other coastal cities. The East Branch flows  
7 through the Antelope Valley and San Bernardino and Riverside Counties.

8 7. Southern Field Division has several facilities utilizing water within the Antelope  
9 Valley Adjudication Area. These facilities include the Pearblossom complex, the Oso complex,  
10 Alamo power plant, and Tehachapi East Afterbay trailers (the TEA trailers).

11 8. Pearblossom Complex. The Pearblossom Complex consists of parcels 3-1228-I  
12 and II, 3-1229 (2 parcels) and 3-1230, which are the Pearblossom Pumping Plant and Southern  
13 Field Division headquarters buildings, which include administrative buildings and  
14 shop/maintenance buildings. An aerial view of these facilities is shown in Exhibit B.

15 9. A schematic of Pearblossom Complex prepared by DWR's Division of Land and  
16 Right of Way showing property parcel numbers is provided on Exhibit C, attached hereto.

17 10. A true and correct copy of the grant deed for parcels 3-1228-I and 3-1228-II is  
18 attached hereto as Exhibit D.

19 11. A true and correct copy of the grant deed for parcels 3-1229 (Parcel 1) and 3-1229  
20 (Parcel 2) are attached hereto as Exhibit E.

21 12. A true and correct copy of the grant deed for parcel 3-1230 is attached hereto as  
22 Exhibit F.

23 13. Oso Complex. The Oso complex consists of Oso Pumping Plant, Oso civil  
24 maintenance subcenter, and thirteen groundwater pumps used to protect the liner of the Aqueduct.  
25 An aerial view of these facilities is attached hereto as Exhibit G. A schematic of Oso Complex  
26 prepared by DWR's Division of Land and Right of Way is provided on Exhibit H, attached  
27 hereto. The Oso Complex comprises one parcel, identified as TEH-1 Unit N.  
28

1           14.     A true and correct copy of the grant deed conveying property within Parcel TEH-1  
2 to the State of California is attached hereto as Exhibit I. The portion of Exhibit I addressing Unit  
3 N begins on page 10 of the exhibit.

4           15.     The conveyance of Unit N to the State addresses water rights on page 13 of  
5 Exhibit I, which states the following:

6                           ALSO EXCEPTING there from all water and water rights  
7                           other than those water sources Grantee, its successors or  
8                           assigns, may develop, and make reasonable use of for the  
9                           operation and maintenance of the following California  
10                          Aqueduct Facilities:

11                                   Office and Maintenance Facilities,  
12                                   Residential Facilities,  
13                                   Visitor's Facilities,

14           16.     All of the Southern Field Division's use at the Oso Complex, however, has been  
15 for office and maintenance facilities, including maintenance of the Aqueduct.

16           17.     Alamo Power Plant. Alamo Power Plant is a 16 megawatt power production  
17 facility within Southern Field Division. An aerial view of Alamo Power Plant and its well is  
18 attached hereto as Exhibit G. All estimates for historic use are based on operational data from  
19 2011 and earlier. During 2012, the plant did not operate due to major maintenance.

20           18.     A schematic of the Alamo Power Plant prepared by DWR's Division of Land and  
21 Right of Way showing property parcel numbers is attached as Exhibit J hereto. As shown by  
22 Exhibit J, Alamo Power Plant and its well are located within one parcel, identified as TEH-1 Unit  
23 K.

24           19.     A copy of the grant deed conveying property within Parcel TEH-1 to the State of  
25 California has been previously identified as Exhibit I.

26           20.     The conveyance of Unit K to the State addresses water rights on page 3 of Exhibit  
27 I, which states the following:

28                           ALSO EXCEPTING there from all water and water rights other  
29                           than those water sources Grantee, its successors or assigns, may  
30                           develop, and make reasonable use of for the operation and  
31                           maintenance of the following California Aqueduct Facilities:

32                                   Office and Maintenance Facilities,  
33                                   Residential Facilities,

1 Visitor's Facilities,  
2 Landscaping care and maintenance[.]

3 21. All of the Southern Field Division's use at the Alamo Power Plant, however, has  
4 been for office and maintenance facilities, including maintenance of the Aqueduct.

5 22. TEA trailers. The TEA trailers are utilized for DWR office space for supervisory  
6 and maintenance crew and related office tasks. One rough structure is also present, used for  
7 staging and storing of equipment. One well is located at the TEA trailer site to provide for  
8 restrooms and domestic use. An aerial view of the TEA trailer site is shown on the right side of  
9 Exhibit G.

10 23. A schematic of the TEA trailer site is attached hereto as Exhibit J. As shown by  
11 Exhibit J, the TEA Trailer site and its well are located within parcels TEH-1, Unit K; TEH-1,  
12 Unit L-2; TEH-1, Unit M-2; and TEH-1, Unit N-2. The grant deed for these parcels is attached as  
13 Exhibit I.

14 In the paragraphs that follow, I describe specific water use within Southern Field Division  
15 and provide estimates for the amounts of such use.

16 24. To summarize the discussion below, total water use at Southern Field Division  
17 includes:

18 a. Total Groundwater. The total Antelope Valley groundwater used is 54.05  
19 acre feet per year.

20 b. Total Imported. The total imported Aqueduct water used is in lieu of  
21 pumping 4,140.9 acre feet per year. Note: seepage from the Aqueduct infiltrating  
22 into Antelope Valley aquifers has not been calculated and is not included in  
23 DWR's estimates.

24 c. Total Purchased Water. The total imported water purchased from Los  
25 Angeles County Waterworks District 40 is 36.77 acre feet per year.

26 \\\

27 \\\

28

WATER USE AT PEARBLOSSOM COMPLEX

25. Pearblossom Pumping Plant cooling water. Pearblossom Pumping Plant pumps water from elevation 2939 to elevation 3478. DWR utilizes water from the Aqueduct to cool bearings and motors at the Pearblossom pumps.

26. The water used per year for this purpose is not metered. I have calculated the amount used to be approximately 2,555.26 acre feet per year.

27. My calculations for this estimate are provided below in the Table entitled "PB Unit Cooling Flows" and also in Exhibit K, attached hereto.

<u>PB Unit Cooling Flows</u>		Total	2555.26
UNIT	GPM	Hrs	AF/YR
1	375.50	2166.80	149.95
2	375.50	2636.10	182.43
3	273.40	4280.50	215.68
4	273.40	4906.00	247.20
5	320.50	5171.80	305.48
6	320.50	4566.30	269.72
7	560.00	4436.70	457.90
8	560.00	3817.60	394.00
9	560.00	3225.60	332.90

28. The first column of the above table shows the number of the individual pump, or "unit" at the Pearblossom Plant. There are three different types of units there. Pumps 1, 2, 5, and 6 have the capacity to pump 290 cubic feet per second (cfs). Pumps 3 and 4 have the capacity to pump 145 cfs. Pumps 7, 8 and 9 are new units, and have the capacity to pump 390 cfs.

29. The second column of the above table shows the measured flow rate in gallons per minute.

30. The third column shows the hours of operation of each of the pumps for calendar year 2012. DWR's enterprise software program, SAP, tracks the start and stop times of these units, so this number is readily available.

31. With this information I am able to determine the acre feet per year for each pump.

1 32. Pearblossom Pumping Plant seal water. DWR purchases water from Los Angeles  
2 County Waterworks District 40, and places it in a storage tank. This water is utilized to create a  
3 pressure seal to prevent Aqueduct water from leaking around the pumping plant's shaft.

4 33. I have calculated the amount used to be approximately 35.45 acre-feet per year.

5 34. My calculations for this estimate are provided below in the Table entitled "PB Unit  
6 Seal Flows" and also in Exhibit K, attached hereto.

7

<u>PB Unit Seal Flows</u>			Total	35.45
UNIT	GPM	Hrs	AF/YR	
1	6.50	2166.80	2.60	
2	6.50	2636.10	3.16	
3	3.50	4280.50	2.76	
4	3.50	4906.00	3.16	
5	6.50	5171.80	6.20	
6	6.50	4566.30	5.47	
7 **	2.50	8760.00	4.04	
8 **	2.50	8760.00	4.04	
9 **	2.50	8760.00	4.04	

8

9

10

11

12

13

14

15 35. This table is interpreted the same way as the previous table and the information  
16 was obtained in the same manner.

17 36. Southern Field Division headquarters buildings and Pearblossom Pumping Plant  
18 domestic use. Domestic use for water in these facilities includes toilets, faucets, sinks, showers  
19 and hose bibs. Landscape uses were not estimated.

20 37. DWR has calculated that 1.32 acre feet per year is currently utilized for the above  
21 domestic uses.

22 38. I have relied for all estimates of domestic use in this declaration on estimates  
23 provided by staff from DWR's Division of Engineering, specifically, the work of Senior Architect  
24 Dave Otto in the Division of Engineering's Civil Engineering Branch.

25 39. Mr. Otto estimated the following:

- 26 a) Pearblossom Pumping Plant: .25 acre feet per year
- 27 b) Southern Field Division Headquarters: 1.07 acre feet per year
- 28

1 40. Pearblossom Complex subtotal:

2 1) DWR pumps no groundwater at this location.

3 2) Total water purchased from Los Angeles County is 36.77 acre feet per  
4 year.

5 3) Imported Aqueduct water utilized in lieu of pumping groundwater by  
6 facilities is 2555.26 acre-feet per year.

7  
8 WATER USE AT OSO COMPLEX

9 41. Aqueduct Liner Protection. The Aqueduct is concrete lined. When groundwater  
10 levels rise above the level of the canal bed, uplift pressure is placed upon the canal, which can  
11 lead to lining failure. To address the danger to the Aqueduct liner, DWR has installed 13 pumps  
12 along the Aqueduct in the vicinity of Oso Pumping Plant to maintain the Aqueduct by dewatering  
13 the aquifer beneath the canal during high groundwater levels. I am unaware of any other method  
14 to address the danger the high groundwater levels present to the Aqueduct. For as long as I have  
15 worked in Southern Field Division, DWR has maintained these pumps and utilized them during  
16 the year.

17 42. Pumps 4, 5, 6, 7, 8, 9, 10, 11, 12, and 13 (collectively, the automatic pumps) are  
18 programmed to operate automatically when groundwater levels reach a certain level. When the  
19 automatic pumps operate, they extract the adjacent groundwater and divert it directly into the  
20 Aqueduct. For the liner to be protected, this water cannot be placed back into the basin at this  
21 site.

22 43. Pumps numbered 2 and 3 operate continuously and support facilities in the Oso  
23 complex as described below.

24 44. Pump 1 is currently inoperable and I have not included pump 1 into my water use  
25 calculations.

26 45. I have calculated the water pumped at the automatic pumps to be 38.28 acre feet  
27 per year.



1           46.    My calculations to support this estimate are provided in the table below, and in  
2 Exhibit K attached hereto.

3                           OS Liner Relief Pumps

4           #	GPM	Hrs	days	duty cycle	AF/YR
5           4	100	5	90	0.46	3.83
6           5	100	5	90	0.46	3.83
7           6	100	5	90	0.46	3.83
8           7	100	5	90	0.46	3.83
9           8	100	5	90	0.46	3.83
10          9	100	5	90	0.46	3.83
11          10	100	5	90	0.46	3.83
12          11	100	5	90	0.46	3.83
13          12	100	5	90	0.46	3.83
14          13	100	5	90	0.46	3.83
total					38.28

15           47.    In the above table, the “#” column indicates the pump number. The “GPM”  
16 column indicates an estimate of the gallons per minute pumped by each unit. Although the rated  
17 capacity for each of these pumps is 300 gpm, they have been in place for many years and in my  
18 opinion are on the low end of their respective pump performance curves. My estimate of 100  
19 gpm for each of the pumps, one-third of the rated capacity, makes an allowance for the age and  
20 low performance of these pumps.

21           48.    I obtained the next three columns, “Hrs”, “Days”, and “duty cycle” from the  
22 Declaration of Ray Ramirez, which was previously filed in the Antelope Adjudication  
23 proceedings, and which I have reviewed in preparing the estimates in this document. Mr.  
24 Ramirez noted that in his experience, the automatic pumps operated five hours per day,  
25 approximately ninety days out of the year. I have included these estimates in the above table.  
26 Mr. Ramirez also conservatively estimated that on average six pumps ran at one time during  
27 operating periods. I have included this estimate in the “duty cycle” column of the above table  
28 (six divided by 13 is .46.)

          49.    Using this information, I am able to calculate the acre feet per year used by the  
automatic pumps.

1           50.    Oso Pumping Plant Seal Water. Oso Pumping Plant pumps water from elevation  
2 3099 to elevation 3325. At the plant, water is utilized from groundwater pumps 2 and 3 to create  
3 the “pressure seal,” described above in the Pearblossom Pumping Plant discussion.

4           51.    I have calculated that approximately 14.97 acre-feet per year is pumped from wells  
5 2 and 3 for this purpose.

6           52.    My calculations to support this estimate are provided in the table “Oso Unit Seal  
7 Flows” below, and in Exhibit K attached hereto.

8

<u>OS Unit Seal Flows</u>			Total	14.97
UNIT	GPM	Hrs	AF/YR	
1	6.5	2982.20	3.57	
2	6.5	3633.90	4.35	
3	3.5	392.30	0.25	
4	3.5	172.00	0.11	
5	3.5	64.30	0.04	
6	3.5	203.00	0.13	
7	6.5	3117.90	3.74	
8	6.5	2311.10	2.77	

9

10

11

12

13

14

15           53.    The first column of the above table shows the number of the individual pump, or  
16 "unit" at the Oso Pumping Plant.

17           54.    The second column of the above table shows the measured flow rate in gallons per  
18 minute.

19           55.    The third column shows the hours of operation of each of the pumps for calendar  
20 year 2012. This figure was obtained from DWR’s enterprise software program, SAP, which  
21 tracks the start and stop times of these units.

22           56.    Using this information, I am able to calculate the acre feet per year used for the  
23 pressure seals.

24           57.    Oso Pumping Plant Cooling Water. Like Pearblossom Pumping Plant, the plant at  
25 Oso cools its bearings and motors with imported Aqueduct water.

26           58.    I have calculated the amount used to be approximately 520.12 acre feet per year.

1           59.     My calculations for this estimate are provided below in the Table entitled "Oso  
2 Unit Cooling Flows" and also in Exhibit K, attached hereto.

3

<u>OS Unit Cooling Flows</u>			total	520.12
UNIT	GPM	Hrs	AF/YR	
1	225.5	2982.20	123.94	
2	225.5	3633.90	151.02	
3	127.5	392.30	9.22	
4	127.5	172.00	4.04	
5	127.5	64.30	1.51	
6	127.5	203.00	4.77	
7	225.5	3117.90	129.58	
8	225.5	2311.10	96.05	

4

5

6

7

8

9

10           60.     The first column of the above table shows the number of the individual pump, or  
11 "unit" at the Oso Plant. There are two different types of units there. Pumps 1, 2, 7, and 8 have  
12 the capacity to pump 645 cfs. Pumps 3, 4, 5 and 6 have the capacity to pump 168 cfs, one-fourth  
13 the capacity of the other pumps.

14           61.     The second column of the above table shows the measured flow rate in gallons per  
15 minute.

16           62.     The third column shows the hours of operation of each of the pumps for calendar  
17 year 2012. DWR's enterprise software program, SAP, tracks the start and stop times of these  
18 units, so this number is readily available.

19           63.     Using this information, I am able to calculate the acre feet per year used for  
20 cooling the bearings.

21           64.     Oso Pumping Plant and Oso Civil Maintenance Subcenter domestic use. Water  
22 from pumps 2 and 3 is also utilized within Oso Pumping Plant for domestic use, including toilets,  
23 faucets, sinks, showers, and hose bibbs. Water from pumps 2 and 3 is also piped to Oso's Civil  
24 Maintenance Subcenter, and provides all the Subcenter's domestic needs.

25           65.     DWR calculates water used for domestic purposes at Oso Pumping Plant to be .33  
26 acre feet per year, and water used at the Oso Civil Maintenance Subcenter to be .13 acre-feet per  
27 year, for a total of .46 acre-feet per year.

28

1 66. I have relied for all estimates of domestic use in this declaration on estimates  
2 provided by staff from DWR's Division of Engineering, specifically, the work of Senior Architect  
3 Dave Otto in the Division of Engineering's Civil Engineering Branch.

4 67. Mr. Otto estimated the following:

- 5 a) Oso Pumping Plant: .33 acre feet per year
- 6 b) Oso Civil Maintenance Subcenter: .13 acre feet per year.

7 68. Oso Complex subtotal:

- 8 1) Total groundwater used is 15.43 acre feet per year.
- 9 2) Imported Aqueduct water utilized is 520.12 acre-feet per year.

10  
11 WATER USE AT THE ALAMO POWER PLANT

12 69. Seals. Aqueduct water is utilized at Alamo Power Plant for generator and bearing  
13 cooling. In addition, Aqueduct water is also used as a pressure seal for the Alamo Power Plant's  
14 turbine shaft.

15 70. I calculated that approximately 1045.52 acre feet per year is used for the above  
16 purposes.

17 71. My calculations to support this estimate are provided below.

18 AL Unit Gen Cooling & Seal flows

UNIT	GPM	Hrs	AF/YR
1	679.5	8348.80	1045.52

ALAMO CW Flow	
AIR COOLER FLOW.. 550-595gpm	572.50
Upper Guide.....60-80gpm	70.00
Lower Guide.....6-8gpm	7.00
Seal Flow.....30gpm	30.00

25 subtotal 679.50 gpm

26 72. There is no one meter measuring total gallons per minute used for Cooling and  
27 Seal flows. However, flows are recorded by hand at least daily for Alamo Power Plant's Air  
28

1 Cooler, Upper Guide, Lower Guide and Seal. The records of these flows are maintained at the  
2 Power Plant. Records for the Air Cooler showed flows during 2011 ranging from a low of 550  
3 gpm to a peak of 595 gpm. For the purpose of this exercise, estimating total water used, I took  
4 the median of each range, and summed each median. Note that the Seal flow is a constant flow,  
5 and there was no median. The result of this calculation is shown above, 679.50 gpm.

6 73. The total hours the Power Plant has been in operation is available on DWR's  
7 enterprise accounting system, SAP. I included this number in the table above.

8 74. Using this information, I am able to calculate the acre feet per year used for  
9 cooling the bearings and for seal flow.

10 75. Cooling and Domestic Use. DWR maintains one submersible groundwater pump  
11 located adjacent to the Alamo Power Plant's afterbay. It is used for two purposes. First, it is used  
12 as cooling water for four air compressors at the plant; and, second, for domestic use at the plant.

13 76. Alamo Power Plant Compressor Cooling. I have calculated the amount used for  
14 cooling to be approximately .2 acre-feet per year. My calculations for this estimate are provided  
15 below in the table entitled "AL Well Flows" and also in Exhibit K, attached hereto.

16

<u>AL Well Flows</u>			
compressors	gallons	Years	AF/YR
4	1,512,387	25	0.20

17  
18

19 77. Domestic use. Groundwater is utilized for domestic use at Alamo Power Plant for  
20 restrooms and drinking fountains, among other minor uses.

21 78. Senior Architect Dave Otto in DWR's Civil Engineering Branch, Division of  
22 Engineering calculates water used for domestic purposes at Alamo Power Plant to be .09 acre feet  
23 per year.

24 79. Alamo Powerplant subtotal:

- 25 1) Total groundwater used is .29 acre-feet per year.  
26 2) Imported Aqueduct water used is 1,045.52 acre-feet per year.

27 WATER USE AT THE TEA TRAILERS

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

80. One submersible type pump is located near the TEA trailers, and provides water for domestic use there. Senior Architect Dave Otto in DWR's Civil Engineering Branch, Division of Engineering calculates water used for domestic purposes at the TEA trailers to be .05 acre feet per year.

81. DWR lists its water purchased and imported in lieu of pumping and maintains it has a right to pump that water from the Antelope Valley Adjudication Area as an overliar, but has chosen to purchase the water in order to preserve the aquifer of an overdrafted basin.

82. DWR is also claiming future unexercised rights to water in the Antelope Valley Adjudication Area for public benefit uses.

83. DWR is not claiming return flow credits.

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

Executed this 31<sup>ST</sup> day of January, 2013, at Pearblossom, California.

  
\_\_\_\_\_

BLAINE LAUMBACH