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8 Attorneys for Cross-Complainants  
9 LITTLEROCK CREEK IRRIGATION DISTRICT, PALM RANCH IRRIGATION DISTRICT,  
10 NORTH EDWARDS WATER DISTRICT, DESERT LAKE COMMUNITY SERVICES DISTRICT,  
11 Defendants LLANO DEL RIO WATER CO., LLANO MUTUAL WATER CO., BIG ROCK MUTUAL  
12 WATER CO.

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

14 **IN AND FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

15 Coordinated Proceeding  
16 Special Title (Rule 1550(b))

**Judicial Council Coordination No. 4408**

17 ANTELOPE VALLEY GROUNDWATER  
18 CASES

Santa Clara Case No. 1-05-CV-049053  
Assigned to the Honorable Jack Komar – Dept. 12

19 Included Actions:

**RESPONSES TO QUESTIONNAIRE  
DIRECTED TO PWS PARTIES, SERVED ON  
BEHALF OF LCID, PRID, DLCSD AND  
NEWD**

20 Los Angeles County Waterworks District No. 40  
21 v. Diamond Farming Co. Los Angeles County  
22 Superior Court Case No. BC 325201;

23 Los Angeles County Waterworks District No. 40  
24 v. Diamond Farming Co., Kern County Superior  
25 Court, Case No. S-1500-CV-234348;

26 Wm. Bolthouse Farms, Inc. v. City of Lancaster  
27 Diamond Farming Co. v. City of Lancaster v.  
28 Palmdale Water District, Riverside County  
Superior Court, Consolidated Actions, Case Nos.  
RIC 353840, RIC 344436, RIC 344668

AND RELATED CROSS-ACTIONS

1 **TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

2 Littlerock Creek Irrigation District, Palm Ranch Irrigation District, North Edwards Water District,  
3 Desert Lake Community Services District submit the following responses to the Phase V questionnaire to  
4 PWS parties:

5 1. Total amount of your groundwater production from 1946 to 2012, by year.

6 See each respective party's chart produced herewith. The respective addendum charts ("Charts") of  
7 Littlerock Creek Irrigation District, Palm Ranch Irrigation District, North Edwards Water District, and  
8 Desert Lake Community Services District, served herewith, are incorporated herein by reference as if set  
9 forth in full.

10 2. The amount of imported water you purchased, by year.

11 See each respective party's Chart produced herewith.

12 3. The amount of return flows generated from the imported water, by year: For each year, the  
13 amount of return flows generated from imported water is 39.1% of each prior year's imported water.

14 4. The amount of your total groundwater production that is adverse, by year: This is equal to  
15 total groundwater production and in lieu rights, without diminishment for return flows. See each  
16 respective party's Chart produced herewith.

17 5. The date when your prescriptive rights ceased to accrue: The rights have not ceased to  
18 accrue.

19 6. The prescriptive period: January 1, 1946 to the present.

20 7. The effect of the filing of Diamond Farming's and Bolthouse's original lawsuits on your  
21 prescriptive rights: They cut off the prescriptive period as to properties owned by the respective plaintiffs  
22 and described in the complaints.

23 8. The total amount of prescriptive rights you claim (without regard to self-help), and the  
24 basis for calculation:

25 North Edwards Water District: 187; Desert Lake CSD: 368; Littlerock Creek Irr. Dist.: 2,838;  
26 Palm Ranch Irr. Dist.: 1605.24. For each of the responding parties, it is the highest amount pumped

1 continuously by that party over a five-year period from 1946 to the present. Therefore, each party used  
2 the lowest number from the highest five-year period.

3 9. Against which parties do you claim prescriptive rights? All private parties including Wood  
4 class and parties who acquired rights from a private party during the prescriptive period, but not including  
5 any of the following parties: the Willis class, Llano del Rio Water Company, Llano Mutual Water  
6 Company, Big Rock Mutual Water Company, Littlerock Creek Irrigation District, Palm Ranch Irrigation  
7 District, North Edwards Water District or Desert Lake Community Services District.

8 10. Any non-prescriptive rights you claim:

9 Responding parties claim domestic and municipal priorities and, respectively, the following:

10 Littlerock Creek Irrigation District asserts rights to: rights to return flows, appropriative rights,  
11 California Water Code section 106, and California Water Code sections 106.3 and 106.5. In addition, it  
12 asserts it has in lieu pumping rights, surface water rights, imported water and the return flows therein,  
13 storage rights and salvaged water and the return flows.

14 Palm Ranch Irrigation District asserts rights to: rights to return flows, in lieu rights, storage rights,  
15 appropriative rights, California Water Code section 106, and California Water Code sections 106.3, 106.5.

16 North Edwards Water District asserts rights to: appropriative rights, California Water Code section  
17 106, and California Water Code sections 106.3, 106.5.

18 Desert Lake Community Services District asserts rights to: rights to return flows, in lieu rights,  
19 storage rights, appropriative rights, California Water Code section 106, and California Water Code  
20 sections 106.3, 106.5.

21 DATED: October 24, 2013

LEMIEUX & O'NEILL

22 By:   
23 \_\_\_\_\_

W. Keith Lemieux

Christine Carson ✓

24 Attorneys for Littlerock Creek Irrigation District, Palm  
25 Ranch Irrigation District, North Edwards Water District And  
26 Desert Lake Community Services District

**NORTH EDWARDS WATER DISTRICT**

**ADDENDUM**

**NORTH EDWARDS WATER DISTRICT ("NEWD")– STATEMENT OF PUBLIC WATER SUPPLIER ADDENDUM  
– PHASE V**

<b>YEAR</b>	<b>GROUNDWATER &amp; GROUNDWATER ADVERSE (IN AF)</b>	<b>PURCHASED WATER</b>	<b>RETURN FLOW CLAIM</b>
1946	*	*	*
1947	*	*	*
1948	*	*	*
1949	*	*	*
1950	*	*	*
1951	*	*	*
1952	*	*	*
1953	*	*	*
1954	*	*	*
1955	*	*	*
1956	*	*	*
1957	*	*	*
1958**	67	0	0
1959	108	0	0
1960	108	0	0
1961	106	0	0
1962	106	0	0
1963	108	0	0
1964	110	0	0
1965	100	0	0
1966	115	0	0
1967	120	0	0
1968	127	0	0
1969	152	0	0
1970	177	0	0
1971	180	0	0
1972	180	0	0
1973	180	0	0
1974	188	0	0
1975	190	0	0
1976	190	0	0
1977	190	0	0
1978	190	0	0
1979	190	0	0
1980	190	0	0
1981	190	0	0
1982	190	0	0
1983	190	0	0
1984	275	0	0
1985	250	0	0

1986	259	0	0
1987	245	0	0
1988	187	0	0
1989	273	0	0
1990	120.79	0	0
1991	48.77	0	0
1992	69.78	0	0
1993	116.42	0	0
1994	115.78	0	0
1995	108.15	0	0
1996	126.23	0	0
1997	62.63	0	0
1998	109.81	0	0
1999	109.52	0	0
2000	126.81	0	0
2001	116.65	0	0
2002	118.36	0	0
2003	111.67	0	0
2004	112.9	0	0
2005	100.37	0	0
2006	99.66	0	0
2007	103.3	0	0
2008	107.3	0	0
2009	103.02	0	0
2010	99.5	0	0
2011	104.52	0	0
2012	101.32	0	0

Note concerning North Edwards Water District data: The information set forth herein is based on information gathered thus far by responding party. Nothing in this response shall be construed as a waiver of any right to amend and/or supplement responses upon receipt of further information.

\*\*Historical pre-1958 pumping data is still being developed.

**PALM RANCH IRRIGATION DISTRICT**

**ADDENDUM**

**PALM RANCH IRRIGATION DISTRICT – STATEMENT OF PUBLIC WATER SUPPLIER - ADDENDUM – PHASE V**

<b>YEAR</b>	<b>GROUNDWATER &amp; GROUNDWATER ADVERSE (IN AF)</b>	<b>PURCHASED WATER</b>	<b>GROUNDWATER PLUS IN LIEU WATER</b>
1946	620		620
1947	826.88		826.88
1948	916.88		916.88
1949	906.88		906.88
1950	906.88		906.88
1951	881.88		881.88
1952	866.88		866.88
1953	861.88		861.88
1954	861.88		861.88
1955	874.69		874.69
1956	911.47		911.47
1957	701.62		701.62
1958	769.39		769.39
1959	955		955
1960	998		998
1961	878.5		878.5
1962	582.7		582.7
1963	902.6		902.6
1964	956.4		956.4
1965	844.5		844.5
1966	842.6		842.6
1967	754.84		754.84
1968	969.7		969.7
1969	2367.3		2367.3
1970	910.7		910.7
1971	847.9		847.9



PRID, YEAR: 1972	GROUNDWATER: 965.4	AVEK: *	TOTAL: 965.4
1973	960	*	960
1974	1021	*	1021
1975	1054.1	*	1054.1
1976	1101	*	1101
1977	1007	*	1007
1978	1110.46	217	1327.46
1979	809.84	307	1116.84
1980	322.22	779	1101.2
1981	224.6	992	1216.6
1982	604.4	591	1195.4
1983	609.56	388	997.56
1984	833.82	339	1172.82
1985	483.07	407	890.07
1986	75.68	979	1054.68
1987	244.55	1058	1302.55
1988	701.51	790	1491.5
1989	531	968	1499
1990	420	1070	1490
1991	685.4	409	1094.4
1992	876.4	679	1555.4
1993	839.3	175	1014.3
1994	805.6	484	1289.6
1995	624.17	736	1360.17
1996	590	832	1422
1997	858	633	1491
1998	482.11	393	875.11
1999	893.84	650	1543.84
2000	1047.24	558	1605.24
2001	1683.15	91	1774.15
2002	1535.62	290.92	1826.54
2003	1558.04	137	1695.04
2004	814.06	877.04	1685.47

2005	GROUNDWATER: 1154.13	AVEK: 572.17	TOTAL: 1726.3
2006	590.7	843.07	1433.77
2007	186.49	804.26	990.75
2008	955.87	694.29	1650.16
2009	1438.81	83.18	1521.99
2010	1350.36	136.15	1486.51
2011	916.48	593	1509.48
2012	1545.11	97.41	1642.52

Note concerning Palm Ranch Irrigation District data: The information set forth herein is based on information in possession of responding party. Records are still being collected. Nothing in this response shall be construed as a waiver of any right to amend and/or supplement responses upon receipt of further information. \*Data is still being developed.

# **LITTLEROCK CREEK IRRIGATION DISTRICT**

## **ADDENDUM**

LITTLEROCK CREEK IRRIGATION DISTRICT – STATEMENT OF PUBLIC WATER SUPPLIER - ADDENDUM –  
 PHASE V

YEAR	GROUNDWATER & GROUNDWATER ADVERSE (IN AF)	PURCHASED SWP WATER	TOTAL OF GROUNDWATER AND IN LIEU WATER
1946	200-600		200-600
1947	220-600		220-600
1948	587.95		587.95
1949	647.09		647.09
1950	627.36		627.36
1951	620.15		620.15
1952	249.67		249.67
1953	887.93		887.93
1954	1321.53		1321.53
1955	1339.6		1339.6
1956	926.53		926.53
1957	90-900		90-900
1958	767.86		767.86
1959	1309.54		1309.54
1960	2212.58		2212.58
1961	2336.74		2336.74
1962	960.34	0	960.34
1963	1889.4	0	1889.4
1964	1224.69	0	1224.69
1965	1257.05	0	1257.05
1966	1024.97	0	1024.97
1967	692.23	0	692.23
1968	1498.39	0	1498.39
1969	914.05	0	914.05
1970	2280.97	0	2280.97
1971	1233.14	0	1233.14
1972	1105.62	338	1443.62
1973	885.16	370	1255.16
1974	923.29	467	1390.29
1975	641.92	876	1517.92
1976	1780.36	589	2369.36
1977	2,344	111	2455
1978	780.62	208	988.62
1979	565	133	698
1980	530	191	721
1981	271.71	1,517	1788.71
1982	221.59	0	221.59
1983	238.49	38	276.49
1984	210.01	1	211.01

1985	455	0	455
1986	811.31	163	974.31
1987	777.62	1085	1862.62
1988	777	419	1196
1989	1006.59	971	1977.59
1990	1226	1747	2973
1991	1241	522	1763
1992	1,212	251	1463
1993	1,270	734	2004
1994	1615	1098	2713
1995	1630	480	2110
1996	1839.15	494	2333.15
1997	1868	444	2312
1998	2003	404	2407
1999	1955	342	2297
2000	2838	0	2838
2001	3004	0	3004
2002	3102	0	3102
2003	3164	0	3164
2004	3593	0	3593
2005	3935	0	3935
2006	2250	0	2250
2007	2405	0	3785
2008	1948	0	1948
2009	1751	0	1751
2010	1704	0	1704
2011	1367 [from Phase IV order]	0	1367
2012	1473.37 [from Phase IV order]	0	1473.37

Note re: Littlerock Creek Irrigation District data: The information set forth herein is based on information gathered thus far. Data is still being developed, and records are still being obtained. Nothing in this response shall be construed as a waiver of any right to amend and/or supplement responses upon receipt of further information.

# **DESERT LAKE COMMUNITY SERVICES DISTRICT**

## **ADDENDUM**

**DESERT LAKE COMMUNITY SERVICES DISTRICT – STATEMENT OF PUBLIC WATER SUPPLIER -  
ADDENDUM – PHASE V**

<b>YEAR</b>	<b>GROUNDWATER &amp; GROUNDWATER ADVERSE (IN AF)</b>	<b>PURCHASED WATER</b>	<b>TOTAL OF GROUNDWATER AND IN LIEU WATER</b>
1946	*	*	*
1947	*	*	*
1948	*	*	*
1949	*	*	*
1950	*	*	*
1951	*	*	*
1952	*	*	*
1953	*	*	*
1954	*	*	*
1955	*	*	*
1956	*	*	*
1957	*	*	*
1958	160	*	*
1959	140	*	*
1960	174	*	*
1961	180	*	*
1962	180	*	*
1963	180	*	*
1964	180	*	*
1965	290	*	*
1966	300	*	*
1967	300	*	*
1968	367	*	*
1969	275	*	*
1970	294	*	*
1971	305	*	*
1972	300	*	*
1973	329	*	*
1974	331	*	*
1975	335	*	*
1976	318	*	*
1977	320	*	*
1978	322	*	*
1979	330	*	*
1980	225	*	*
1981	260	62	322
1982	270	54	324
1983	300	85	385
1984	180	72	252
1985	193	58	251

1986	213	44	257
1987	195	31	226
1988	177	82	259
1989	340	80	420
1990	359	30	389
1991	251	30	281
1992	348	24	372
1993	353	43	396
1994	353	174	527
1995	353	314	667
1996	353	128	481
1997	353	88	441
1998	353	91	444
1999	353	63	416
2000	353	15	368
2001	353	19	372
2002	353	35	388
2003	437.15	26	463.15
2004	325.94	51.02	376.96
2005	173.02	81.76	255
2006	187.98	(See record from AVEK)	187.98
2007	0	205.24 (see AVEK record)	205.24
2008	44.19	113.4 (see AVEK record)	157.59
2009	136.2	14.52 (see AVEK record)	150.72
2010	143.046	46.86	189.9
2011	57.83	95.085	152.911
2012	27.49	116.14	143.63

Note concerning Desert Lake CSD data: The information set forth herein is based on records located thus far. Nothing in this response shall be construed as a waiver of any right to amend and/or supplement responses upon receipt of further information. \*Data is still being developed.



AVEK Water Agency - 2013  
Sales Journal  
For the Period From Jan 1, 2006 to Dec 31, 2009  
Filter Criteria includes: 1) Customer IDs from Desert to Desert. Report order is by Invoice/CM Date. Report is printed in Detail Format.

Date	Account ID	Invoice/CM #	Line Description	Debit Amnt	Credit Amnt	Qty
1/31/06	410100	9486	M & I water charge Jan 2006		119.50	0.50
	410100		M & I water charge reading Adjustment		157.74	0.66
	152000		Desert Lake CSD	277.24		
2/28/06	410100	9588	M & I water charge Feb 2006		119.50	0.50
	410100		M & I water charge adjusted reading		1,541.55	6.45
	152000		Desert Lake CSD	1,661.05		
3/31/06	410100	9685	M & I water charge Mar 2006		119.50	0.50
	152000		Desert Lake CSD	119.50		
4/30/06	410100	9791	M & I water charge Apr 2006		1,962.19	8.21
	152000		Desert Lake CSD	1,962.19		
5/31/06	410100	9882	M & I water charge May 2006		4,531.44	18.96
	152000		Desert Lake CSD	4,531.44		
6/30/06	410100	9990	M & I water charge June 2006		5,772.12	18.68
	152000		Desert Lake CSD	5,772.12		
7/31/06	410100	10123	M & I water charge July 2006		4,528.84	22.42
	410100		Priority rate 2			
	152000		M & I water charge Feb - May billed at rate One/ should be rate two	1,413.77		38.21
	410100		M & I water charge June billed at rate one/should be rate two	1,998.76		18.68
	152000		Desert Lake CSD	1,116.31		
8/31/06	410100	10229	M & I water charge Rate #2 Mar 2006		1,298.86	6.43
	410100		M & I water charge #2			
	152000		Desert Lake CSD	6,546.82	5,247.96	25.98
9/30/06	410100	10338	M & I water charge Sept 2006		3,009.80	14.90
	152000		Desert Lake CSD	3,009.80		
10/31/06	410100	10452	M & I water charge Oct 2006		101.00	0.50
	152000		Desert Lake CSD	101.00		
11/30/06	410100	10557	M & I water charge Nov 2006		101.00	0.50
	152000		Rate #2			
	152000		Desert Lake CSD	101.00		
12/31/06	410100	10669	M & I water charge Dec 2006		1,636.20	8.10
	410100		M & I water charge Sept 2006 correction		692.86	3.43
	410100		M & I water charge Oct 2006 correction		2,993.64	14.82
	410100		M & I water charge Nov 2006 correction		2,676.50	13.25

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA, )  
3 ) ss.  
4 COUNTY OF VENTURA )

5 I am employed in the County of Ventura, State of California. I am over the age of 18 and not a  
6 party to the within action. My business address is 4165 E. Thousand Oaks Blvd., Suite 350, Westlake  
7 Village, California 91362.

8 On **October 24, 2013**, I posted the following document(s) to the website <http://www.scefiling.org>,  
9 a dedicated link to the Antelope Valley Groundwater Cases, and upon which the parties have agreed this  
10 posting constitutes service.

11 **RESPONSES TO QUESTIONNAIRE DIRECTED TO PWS PARTIES, SERVED ON BEHALF**  
12 **OF LCID, PRID, DLCSD AND NEWD**

13 By electronically serving through <http://www.scefiling.org>, and addressed to all parties appearing  
14 on the <http://www.scefiling.org> electronic service list, the file transmission was reported as complete and  
15 a copy of the <http://www.scefiling.org> Filing/Service Receipt will be maintained with a copy of the  
16 document in our office.

17 I am readily familiar with the business practice for collection and processing of pleadings and  
18 discovery for electronic service with <http://www.scefiling.org>, and that the pleadings and discovery shall  
19 be electronically served this same day in the ordinary course of business.

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

22 Executed on October 24, 2013, in Westlake Village, California.

23   
24 Kathi Miens