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BEST BEST & KRIEGER LLP
ERIC L. GARNER, Bar No. 130665
JEFFREY V. DUNN, Bar No. 131926
STEFANIE D. HEDLUND, Bar No. 239787
5 PARK PLAZA, SUITE 1500
IRVINE, CALIFORNIA 92614
TELEPHONE: (949) 263-2600
TELECOPIER: (949) 260-0972

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OFFICE OF COUNTY COUNSEL
COUNTY OF LOS ANGELES
RAYMOND G. FORTNER, JR., Bar No. 42230
COUNTY COUNSEL
FREDERICK W. PFAEFFLE, Bar No. 145742
SENIOR DEPUTY COUNTY COUNSEL
500 WEST TEMPLE STREET
LOS ANGELES, CALIFORNIA 90012
TELEPHONE: (213) 974-1901
TELECOPIER: (213) 458-4020

Attorneys for Plaintiffs
ROSAMOND COMMUNITY SERVICES
DISTRICT and LOS ANGELES COUNTY
WATERWORKS DISTRICT NO. 40

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES – CENTRAL DISTRICT

**ANTELOPE VALLEY
GROUNDWATER CASES**

Included Actions:
Los Angeles County Waterworks District
No. 40 v. Diamond Farming Co., Superior
Court of California, County of Los
Angeles, Case No. BC 325201;

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

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

Judicial Council Coordination No. 4408

Santa Clara Case No. 1-05-CV-049053
Assigned to The Honorable Jack Komar

**DECLARATION OF WILLIAM E.
LEEVEER JR.**

1 I, William Leever, declare as follows:

2

3 1. I am an Associate Hydrogeologist at Wildermuth Environmental Inc. (“WEI”).

4

5 2. I have over 16 years of experience in water resources engineering and planning,
6 including but not limited to, surface and groundwater hydrology and hydraulics, water resources
7 planning and water rights.

8

9 3. I received a Bachelors of Science in Geology from California State University,
10 Fullerton in 1990. I am a Professional Geologist, California No. 6815 and a Certified
11 Hydrogeologist, California No. 827.

12

13 4. WEI has been retained by Lagerlof, Senecal, Gosney & Kruse to provide technical
14 support in surface and groundwater hydrology in connection with the Antelope Valley
15 Groundwater Adjudication. As part of my technical support, I attend and participate in the
16 Technical Expert Committee Meetings held with most experts retained to provide technical
17 assistance in connection with the Antelope Valley Groundwater Adjudication.

18

19 5. WEI was asked to determine the number of small pumpers in the Antelope Valley
20 Groundwater Basin adjudication area determined by the Court in its November 3, 2006 order
21 (“Adjudication Area”).

22

23 6. Through the use of digital mapping and an associated database with digital
24 mapping of parcels in Los Angeles County and Kern County, I was able to determine whether or
25 not individual parcels were unimproved or developed in the Adjudication Area as of 2006. WEI
26 obtained digital mapping of public water service areas of large and small municipal water
27 providers in the Adjudication Area to identify land parcels outside the service areas of municipal
28 water providers.

1 7. I obtained the Geographic Information Systems (“GIS”) shape file of the
2 Adjudication Area that was created by the firm of Luhdorff and Scalmanini. I then obtained
3 parcel maps and tax roll data for the 2006 tax year provided by the Los Angeles County and Kern
4 County Assessors offices in the form of GIS shape files and database files. I used the data to
5 create a subset of the Los Angeles County and Kern County parcel data by overlying the GIS
6 shape file of the Adjudication Area on the two county parcel GIS shape files. The data subset
7 represents all Kern and Los Angeles County parcels completely or partially within the
8 Adjudication Area.

9
10 8. I next obtained or created GIS shape files for certain State Water Contractors,
11 water districts, Los Angeles County Waterworks District No. 40, mutual water companies and the
12 United States. I obtained the data for the State Water Contractors shape file from the California
13 Spatial Information Library (CaSIL). They include Littlerock Creek Irrigation District, Palmdale
14 Water District, and Tehachapi-Cummings County Water District. I also obtained the data for the
15 private water districts shape file from CaSIL. These districts include Boron Community Services
16 District, North Edwards Water District, Palm Ranch Irrigation District, Quartz Hill Water
17 District, Rosamond Community Services District, and West Valley County Water District. I
18 obtained the data for Los Angeles County Waterworks District No. 40 from Los Angeles County
19 Waterworks District No. 40. I obtained the data for the mutual water companies from various
20 sources, including Antelope Valley East- Kern Water Agency (“AVEK”), individual mutual
21 water company owners, Palmdale Water District, and Los Angeles County Waterworks District
22 No. 40. In the Adjudication Area there are 36 mutual water companies. Finally, I obtained the
23 data for the United States from CaSIL. The Federal Government land includes land owned or
24 managed by the United States Military, United States Fish and Wildlife Service, National Park
25 Service, Bureau of Land Management, and U.S. Forest Service.

26
27 9. From the subset of data developed in paragraph number 7, I eliminated any parcel
28

1 whose centroid¹ was within the boundary of a State Water Contractor (with the exception of
2 AVEK), water district, mutual water company, Los Angeles County Waterworks District No. 40,
3 and Federal Government parcels. The results of this analysis were GIS shape files and associated
4 parcel data that included all Los Angeles County and Kern County parcels that are completely or
5 partially within the Adjudication Area and whose centroids are outside of the service area of one
6 of the above-mentioned water providers.

7
8 10. I have determined through the above GIS analysis that there are 165,889 parcels
9 within the Los Angeles County portion of the Adjudication Area. Of these parcels there are
10 53,000 that are outside of the boundary of a State Water Contractor (with the exception of
11 AVEK), water district, mutual water company, Los Angeles County Waterworks District No. 40,
12 and Federal Government parcels. Of these 53,000 parcels, 6,470 are indicated as improved by the
13 Los Angeles County Assessor's office.

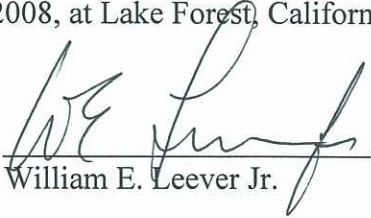
14
15 11. I have determined through the above outlined GIS analysis that there are 20,977
16 parcels within the Kern County portion of the Adjudication Area. Of these parcels there are
17 13,302 that are outside of the boundary of a State Water Contractor (with the exception of
18 AVEK), water district, mutual water company, Los Angeles County Waterworks District No. 40,
19 and the Federal Government. Of these 13,302 parcels, 975 are indicated as improved by the Kern
20 County Assessor's office.

21
22 12. It is reasonable to assume that the parcels listed as 'improved' by the assessor's
23 office, which are outside the service areas of the water providers, pump groundwater for use on
24 the parcels. Therefore, as a first approximation, I conclude that there are approximately 7,500
25 small pumpers in the Basin.

26
27 ¹ A centroid is a point whose coordinates are the averages of the corresponding coordinates of a given set of points
28 and which for a given plane or three-dimensional figure (as a triangle or sphere) corresponds to the center of mass of
a thin plate of uniform thickness and consistency or a body of uniform consistency having the same boundary

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I declare under penalty of perjury under the laws of the State of California that the forgoing is true and correct. Executed this 1st day of May 2008, at Lake Forest, California.



William E. Leever Jr.

LAW OFFICES OF
BEST BEST & KRIEGER LLP
5 PARK PLAZA, SUITE 1500
IRVINE, CALIFORNIA 92614