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17 ANGELES and  
18 LOS ANGELES WORLD AIRPORTS

Exempt from Filing Fee Pursuant to  
Government Code Section 6103

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
12 COUNTY OF LOS ANGELES

14 Coordination Proceeding  
15 **ANTELOPE VALLEY**  
16 **GROUNDWATER CASES**  
17 Los Angeles County Waterworks District  
18 No. 40 v. Diamond Farming Co.  
19 Los Angeles County Waterworks District  
20 No. 40 v. Diamond Farming Co.  
21 Wm. Bolthouse Farms, Inc. v. City of  
22 Lancaster  
23 Diamond Farming Co. v. City of  
24 Lancaster  
25 Diamond Farming Co. v. Palmdale Water  
26 District

Case No. 105 CV 049053  
Judicial Council Coordination Proceeding  
No. 4408  
The Honorable Jack Komar  
Santa Clara Case No. Case No. 105 CV 049053  
**DECLARATION OF VIVIAN D. HOWELL  
IN LIEU OF DEPOSITION TESTIMONY  
FOR PHASE 4 TRIAL FILED IN SUPPORT  
OF THE CITY OF LOS ANGELES'S  
APPLICATION FOR WATER RIGHTS  
AND EXHIBITS**  
Riverside County Superior Court  
Lead Case No. RIC 344436  
Case No. RIC 344668  
Case No. RIC 353840  
Los Angeles Superior Court  
Case No. BC 325201  
Kern County Superior Court  
Case No. S-1500-CV-254348

Date: January 16, 2013

1 I. DECLARATION

2 I, Vivian D. Howell declare:

3 1. I am the Manager of the Commercial Development Real Estate and Property  
4 Management – LAX Non-Airfield and Palmdale with the City of Los Angeles, Department of Airports,  
5 Los Angeles World Airports (“LAWA”). I have been employed by the City of Los Angeles since  
6 1983. I was employed with LAWA in 1998 for one year and currently from 2000 to the present.  
7 The information contained herein is based on information and belief after my review of  
8 documents attached hereto, independent investigation as to the matters raised herein, and based  
9 on my 14 years of experience with LAWA. In lieu of deposition testimony for the Phase 4 trial, I  
10 am providing this declaration. If called upon to testify, I could and would competently testify to  
11 the matters contained herein. I have been authorized to make this declaration on behalf of the  
12 City of Los Angeles and the Los Angeles World Airports.

13 II. PROPERTY OWNERSHIP AND PARCEL SIZE

14 2. LAWA owns approximately 27 square miles of land (approximately 17,750 acres)  
15 that overlies the Antelope Valley Area of Adjudication as decided by this Court. LAWA claims  
16 overlying groundwater rights as to this land. All of the twelve- hundred plus contiguous parcels  
17 owned by LAWA are identified and recorded in the Assessor’s tax rolls by Assessor’s  
18 Identification Numbers (“AINS”). The land is in Los Angeles County and is identified by AIN in  
19 Exhibit A. A true and correct copy of Exhibit A is attached hereto and is incorporated herein.

20 3. In addition to the land identified by the Assessor’s Identification Numbers shown  
21 in Exhibit A hereto, the City of Los Angeles owns parcels within the Antelope Valley on which  
22 its Los Angeles Aqueducts and related appurtenances are located. No claim of groundwater  
23 rights is made for such parcels, and they are not, therefore, enumerated in Exhibit A.

24 4. A list of the parcels that have changed ownership since 1999, showing both the  
25 Assessor’s Identification Number for the parcel under prior ownership and what is believed to be  
26 the Assessor’s Identification Number for LAWA ownership of the parcel is attached hereto as  
27 Exhibit A-1. A true and correct copy of Exhibit A-1 is attached hereto and is incorporated  
28 herein.



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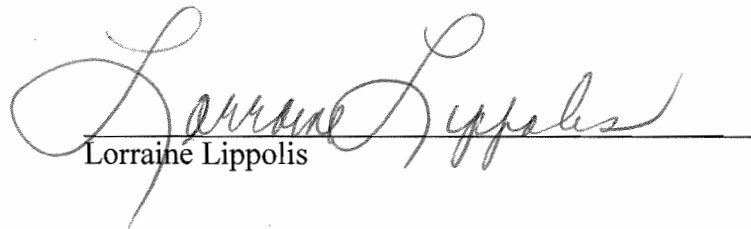
PROOF OF SERVICE

I DECLARE THAT:

I am employed in the County of Sacramento, State of California. I am over the age of eighteen years and not a party to the within action. My business address is 400 Capitol Mall, 27<sup>th</sup> Floor, Sacramento, California 95814.

On January 31, 2013, I served the attached DECLARATION OF VIVIAN D. HOWELL IN LIEU OF DEPOSITION TESTIMONY FOR PHASE 4 TRIAL FILED IN SUPPORT OF THE CITY OF LOS ANGELES'S APPLICATION FOR WATER RIGHTS AND EXHIBITS by posting the document to the Santa Clara Superior Court website [www.scefiling.org](http://www.scefiling.org) in regard to the Antelope Valley Groundwater matter.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct and that this document was executed on January 31, 2013.

  
Lorraine Lippolis