

1 Jeffrey M. Garber (SBN: 127515)
LAW OFFICES OF JEFFREY GARBER
2 3205 S. Dogwood Rd., Ste. B
3 El Centro, California 92243
Office: 760.996.0368; Fax: 760.352.5561
4 Email: Office@JeffGarberLaw.com

5 Of Counsel:
6 Karen L. Bilotti (SBN: 144741)
450 Via Del Norte, Suite B
7 La Jolla, CA 92037
Office: 442.222.0081
8 Email: karen_bilotti@yahoo.com

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10 Attorneys for Cross-Defendants, Hi-Grade Materials, Co.;
Robar Enterprises, Inc.; and CJR, a general partnership
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12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
13 **COUNTY OF LOS ANGELES – CENTRAL DISTRICT**
14

15 **ANTELOPE VALLEY GROUNDWATER**
16 **CASES**

17 Included Actions:

18 Los Angeles County Waterworks District No.
40 v. Diamond Farming Co.,
19 Superior Court of California, County of Los
20 Angeles, Case No. BC 325201

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

24 Wm. Bolthouse Farms, Inc. v. City of
Lancaster; Diamond Farming Co. v. City
25 Lancaster; Diamond Farming Co. v. Palmdale
26 Water Dist.,
Superior Court of California, County of
27 Riverside, Case Nos. RIC 353 840, RIC 344
28 436, RIC 344 668

Judicial Council Coordination
No. 4408

For filing purposes only:
Santa Clara Case No.
1-05-CV-049053

CROSS-DEFENDANTS HI-GRADE
MATERIALS CO.; ROBAR
ENTERPRISES, INC.; AND CJR'S
DECLARATION IN SUPPORT OF
PROVE-UP FOR PHASE VI
TRIAL; DECLARATION OF
CHRIS GIAMPIETRO

Assigned to the
Honorable Jack Komar

DECLARATION OF CHRIS GIAMPIETRO

1 1. I am employed by Hi-Grade Materials Co. (Hi-Grade) as the Vice President of
2 Quarry Operations. If called as a witness, I could and would competently testify to the facts set
3 forth herein from my personal knowledge.

4 2. My duties include overseeing operations at Hi-Grade's Littlerock Quarry
5 located in Littlerock, California.

6 3. There are three groundwater wells located at the Littlerock Quarry.
7 Groundwater is used on site to control dust, wash and process rock, sand and gravel, and to
8 manufacture ready mix concrete. Well pump #1 is rated at 50 HP, 280 GPM. Pump #2 is rated
9 at 20 HP, 250 GPM. Pump #3 is rated at 40 HP, 80 GPM.

10 4. The wells do not have flow meters or isolated electrical panels. I have estimated
11 Hi-Grade's groundwater use at the Littlerock quarry and batch plant operation as a function of
12 water consumed during production of ready mix concrete, rock and sand, water used for dust
13 control, pond evaporation and infiltration. Hi-Grade's production output is confidential and can
14 be provided upon request to counsel who have executed the first amended protective order that
15 was signed by Judge Komar on March 25, 2013 and filed on or about the same date.

16 5. Groundwater used in the processing and manufacturing of rock, sand and
17 concrete is pumped from the three wells.

18 6. Well #1 is run to the concrete batch plant and whatever is not consumed is sent
19 to the quarry for aggregate processing. Approximately 40 gallons is consumed by each cubic
20 yard of ready mix concrete and 22 gallons of water per cubic yard is used for wash down at
21 plant and wash out at job site after pour.

22 7. Well #2 feeds the fresh water pond which feeds the quarry operation for
23 aggregate washing, processing and pond maintenance.

24 8. Well #3 is run to quarry plant Nesco dust control system and water truck fill
25 pipe. The water truck holds 2,000 gallons and is run on average three times per hour, ten hours
26 per day, 286 days per year which equates to 52 acre feet for ground dust control. There are two
27 ponds with a combined surface area of 3.1 acres. Evaporative losses from the ponds are
28 estimated at 20 acre feet per year based on average pan evaporation data obtained from the
California Climate Data Archive. Pond infiltration is estimated conservatively at 195 acre feet
per year.

