

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

1 **BEST BEST & KRIEGER LLP**  
ERIC L. GARNER, Bar No. 130665  
2 JEFFREY V. DUNN, Bar No. 131926  
STEFANIE D. HEDLUND, Bar No. 239787  
3 18101 VON KARMAN AVENUE, SUITE 1000  
IRVINE, CALIFORNIA 92612  
4 TELEPHONE: (949) 263-2600  
FACSIMILE: (949) 260-0972  
5 Attorneys for Cross-Complainant  
LOS ANGELES COUNTY WATERWORKS  
6 DISTRICT NO. 40

**EXEMPT FROM FILING FEES  
UNDER GOVERNMENT CODE  
SECTION 6103**

7 **OFFICE OF COUNTY COUNSEL**  
COUNTY OF LOS ANGELES  
8 JOHN F. KRATTLI, Bar No. 82149  
COUNTY COUNSEL  
9 WARREN WELLEN, Bar No. 139152  
PRINCIPAL DEPUTY COUNTY COUNSEL  
10 500 WEST TEMPLE STREET  
LOS ANGELES, CALIFORNIA 90012  
11 TELEPHONE: (213) 974-8407  
TELECOPIER: (213) 687-7337  
12 Attorneys for Cross-Complainant LOS ANGELES  
COUNTY WATERWORKS DISTRICT NO. 40

14 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
15 COUNTY OF LOS ANGELES

17 **ANTELOPE VALLEY  
GROUNDWATER CASES**

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

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

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

Judicial Council Coordination No. 4408

CLASS ACTION

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

**DECLARATION OF GERALD T.  
BOETSCH JR. IN LIEU OF DEPOSITION  
TESTIMONY FOR PHASE 4 TRIAL**

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

1 **DECLARATION**

2 I, Gerald T. Boetsch Jr., declare:

3 1. I am a Mechanical Engineer for the U.S. Department of the Air Force, assigned to  
4 Edwards Air Force Base (Edwards AFB). The United States is a party to this action. In lieu of  
5 deposition testimony for the Phase 4 trial, I am providing this declaration. I have personal  
6 knowledge of each fact herein, or have obtained these facts from the business records of Edwards  
7 AFB and would testify competently thereto under oath.

8 **Property Ownership and Parcel Size**

9 2. The United States owns property known as Edwards AFB that overlies the Antelope  
10 Valley Area of Adjudication as decided by this Court. The land is in Kern County and Los  
11 Angeles County within the adjudication area, and also includes a portion of San Bernardino  
12 County, and is identified by the following APNs: See Exhibit A. A true and correct copy of  
13 Exhibit A is attached hereto and incorporated herein.

14 3. With respect to Edwards AFB, the United States claims groundwater rights only as to the  
15 properties listed in Paragraph 2 and Exhibit A.

16 4. For each APN identified above, the total acreage by parcel is as follows: Edwards AFB is  
17 approximately 307,000 acres in size.

18 5. For each APN identified above, the United States of America owned the property during  
19 the following time period: At least January 1, 2000 to the present.

20 6. The following are all individuals/entities appearing on the title for the above identified  
21 APNs from Jan 1, 2000 to the present: United States of America

22 7. For each individual/entity identified in paragraph 6, that individual/entity appeared on the  
23 title during the following time: At least January 1, 2000 to the present.

24 **Water Meter Records**

25 8. The United States measures the groundwater production on the above referenced  
26 properties by water meters. Bates-numbered documents USAF000854 – USAF001648,  
27 USAF005369 – USAF005799 and USAF005800 - USAF007238 in the U.S. Document  
28 Production contain the records for these water meters for the following years:

1 2000-2004, 2011 and January 1 to November 30, 2012.

2 9. Exhibit B sets forth the total yearly production amounts by APN for metered water wells  
3 on the above referenced properties for the years 2000-2004, 2011, and January 1 to November 30,  
4 2012. A true and correct copy of Exhibit B is attached hereto and incorporated herein.

5 **State Water Project Purchases**

6 10. The United States purchases State Water Project water from the Antelope Valley – East  
7 Kern Water Agency (AVEK), a State Water Contractor, for use by the United States on the  
8 properties referenced above. The United States measures the State Water Project water entering  
9 Edwards AFB by a water meter. Bates-numbered documents USAF005800 - USAF007238 in the  
10 U.S. Document Production contain the records for this water meter for the following years:  
11 2000-2004, 2011 and January 1 to November 30, 2012.

12 11. Exhibit C sets forth the total yearly State Water Project water deliveries to the properties  
13 referenced above for the years 2000-2004, 2011, and January 1 to November 30, 2012. A true  
14 and correct copy of Exhibit C is attached hereto and incorporated herein.

15 **Other Sources of Water**

16 12. I understand the United States considers recycled water from the Edwards AFB  
17 wastewater treatment plant to be water from a source other than groundwater pumped within the  
18 Basin or State Water Project Water. On the properties referenced above, the United States used  
19 recycled water. Exhibit D sets forth the amounts of recycled water used for the years 2000-2004,  
20 2011, and January 1 to November 30, 2012.

21 **Use of Water**

22 13. The United States used 7,640 acre feet of water (groundwater, surface water, recycled  
23 water) on the above identified APNs in 2000. The water was used for the following:  
24 Military purposes in connection with Edwards AFB. Water at Edwards AFB was used for  
25 domestic, industrial, construction and fire protection purposes to support the military mission.  
26 Examples include supplying water to industrial production facilities, cooling rocket motors,  
27 aircraft maintenance, office buildings, commercial and shopping areas for base personnel,  
28 residences, drinking water, irrigation of landscaping, schools, medical clinic, and recreation.

1 14. The United States used 7,680 acre feet of water (groundwater, surface water, recycled  
2 water) on the above identified APNs in 2001. The water was used for the following:

3 See response to paragraph 13 above.

4 15. The United States used 6,445 acre feet of water (groundwater, surface water, recycled  
5 water) on the above identified APNs in 2002. The water was used for the following:

6 See response to paragraph 13 above.

7 16. The United States used 5,814 acre feet of water (groundwater, surface water, recycled  
8 water) on the above identified APNs in 2003. The water was used for the following:

9 See response to paragraph 13 above.

10 17. The United States used 5,905 acre feet of water (groundwater, surface water, recycled  
11 water) on the above identified APNs in 2004. The water was used for the following:

12 See response to paragraph 13 above.

13 18. The United States used 3,118 acre feet of water (groundwater, surface water, recycled  
14 water) on the above identified APNs in 2011. The water was used for the following:

15 See response to paragraph 13 above.

16 19. The United States used 2,892 acre feet of water (groundwater, surface water, recycled  
17 water) on the above identified APNs in January 1 to November 30, 2012. The water was used for  
18 the following: See response to paragraph 13 above.

19 20. Other than what is declared hereinabove, the United States did not produce or use water  
20 within the Antelope Valley Area of Adjudication for Edwards AFB for 2000-2004, 2011, and  
21 January 1 to November 30, 2012.

22  
23 I declare under penalty of perjury under the laws of the State of California that the  
24 foregoing is true and correct. Executed this 31st day of January 2013, at Edwards AFB,  
25 California.

26  
27   
28

Exhibit A - Assessor Parcel Numbers for Edwards AFB

Kern County Assessor Parcel Numbers	Los Angeles County Assessor Identification Number	San Bernardino County Assessor Parcel Numbers
230-020-01	3145-004-300	049209106
230-080-20	3145-004-908	049226204
232-081-11	3145-004-901	049222107
232-220-18	3145-004-902	049220106
232-220-21	3145-004-900	049222109
232-220-24	3145-004-907	049222113
232-220-25	3145-004-905	049222114
233-231-15	3145-004-904	049220105
233-231-17	3145-004-911	049315101
233-330-06	3145-004-910	049312404
233-340-07	3145-004-909	049314102
233-340-10	3145-004-906	049220101
233-340-13	3145-024-902	049316117
234-052-16	3145-024-900	049220102
234-052-19	3145-024-901	049220102
234-052-20	3145-022-900	049208101
234-053-27	3145-022-902	049208102
234-053-28	3145-024-904	049313105
234-053-29	3145-022-904	049313106
234-053-30	3145-022-905	049315106
234-053-31	3145-022-903	049314105
234-053-32	3145-024-903	049211109
234-061-11	3314-001-908	049314106
234-061-13	3316-001-900	049316116
234-061-14	3316-001-901	049316115
234-061-16	3316-001-905	049315105
234-061-18	3316-001-903	049312402
234-061-19	3316-001-902	049316118
234-061-27	3310-001-900	049316119
234-061-28	3310-001-905	049316110
244-010-11	3314-001-903	049317105

Exhibit A - Assessor Parcel Numbers for Edwards AFB

Kern County Assessor Parcel Numbers	Los Angeles County Assessor Identification Number	San Bernardino County Assessor Parcel Numbers
244-010-12	3314-001-904	049316120
244-010-13	3314-001-905	049316114
244-020-01	3314-001-902	049316106
244-020-02	3314-001-901	049208103
244-020-03	3314-001-900	049222110
244-020-04	3302-001-901	049208104
244-030-01	3302-001-300	049210102
244-030-02	3302-001-904	049316102
244-030-03	3302-001-903	049213124
244-030-04	3302-001-907	049210101
244-040-01	3302-001-908	049313102
244-040-02	3302-001-900	049312403
244-040-04	3302-001-905	049209105
244-040-05	3306-001-900	049210109
244-040-06	3306-001-901	049226203
244-050-01	3306-001-300	049222108
244-050-02	3306-001-902	049208106
244-050-03	3306-001-904	049209104
244-050-04	3306-001-903	049220105
244-050-05	3306-001-908	049209103
244-050-06	3306-001-906	049314101
244-050-07	3306-001-905	049315102
244-050-08	3310-007-900	049210110
244-060-01	3310-007-901	049208105
244-060-02	3310-007-300	049315104
244-060-03	3310-001-901	049313101
244-060-04	3310-001-902	049314103
244-060-05	3310-001-903	049314104
244-060-06	3310-001-904	049315103
244-070-01	3310-001-907	049226202
244-070-02	3310-001-908	049226201

Exhibit A - Assessor Parcel Numbers for Edwards AFB

Kern County Assessor Parcel Numbers	Los Angeles County Assessor Identification Number	San Bernardino County Assessor Parcel Numbers
244-070-03	3310-001-906	049222112
244-070-04	3314-001-907	049222111
244-070-05	3314-001-906	049211101
244-070-06	3314-001-300	049211102
244-080-01	3314-001-911	049312401
244-080-02	3314-001-910	049317106
244-080-03	3316-001-906	049316105
244-080-04	3316-001-911	049220101
244-080-05	3316-001-301	049219107
244-080-06	3316-001-910	049311101
244-090-01	3316-001-300	049311102
244-090-02	3316-001-907	049316107
244-090-03	3316-001-908	049316108
244-090-04	3302-001-906	049316109
244-090-05	3316-001-904	049316111
244-090-06	3145-022-901	049316112
244-100-01	3316-001-909	049316113
244-100-02	3314-001-909	049316121
244-100-03	3302-001-902	049311106
244-100-04	3306-001-907	049317104
244-100-05		049316103
244-100-06		049317102
244-100-07		049316101
244-100-08		049317101
244-110-01		049311105
244-110-02		049317103
244-110-03		049316104
244-110-04		049209101
244-110-05		049209102
244-110-06		049211108
244-110-07		049314107

Exhibit A - Assessor Parcel Numbers for Edwards AFB

Kern County  
Assessor Parcel Numbers

- 244-120-01
- 244-120-02
- 244-120-03
- 244-120-04
- 244-120-05
- 244-120-06
- 244-130-01
- 244-130-02
- 244-130-03
- 244-130-04
- 244-130-05
- 244-130-06
- 244-130-07
- 244-140-01
- 244-140-02
- 244-140-03
- 244-140-04
- 244-140-05
- 244-140-06
- 244-150-01
- 244-150-02
- 244-150-03
- 244-150-04
- 244-150-05
- 244-150-06
- 244-150-07
- 244-150-08
- 244-160-01
- 244-160-02
- 244-160-03
- 244-160-04

Los Angeles County  
Assessor Identification Number

San Bernardino County  
Assessor Parcel Numbers



Exhibit A - Assessor Parcel Numbers for Edwards AFB

Kern County  
Assessor Parcel Numbers

244-160-05  
244-160-06  
244-160-07  
244-160-08  
244-160-09  
244-170-01  
244-170-02  
244-170-03  
244-170-04  
244-170-05  
244-170-06  
244-170-07  
244-170-08  
244-170-09  
244-170-10  
244-180-01  
244-180-02  
244-180-03  
244-180-04  
244-180-05  
244-180-06  
244-190-01  
244-190-02  
244-190-03  
244-190-04  
244-190-05  
244-190-06  
244-190-07  
244-190-08  
244-200-01  
244-200-02

Los Angeles County  
Assessor Identification Number

San Bernardino County  
Assessor Parcel Numbers

Exhibit A - Assessor Parcel Numbers for Edwards AFB

Kern County  
Assessor Parcel Numbers

244-200-03  
244-200-04  
244-200-05  
244-200-06  
244-210-01  
244-210-02  
244-210-03  
244-210-04  
244-210-05  
244-210-06  
244-210-07  
244-210-08  
244-240-01  
244-240-02  
244-240-03  
244-240-04  
244-240-05  
244-240-06  
244-250-01  
244-250-02  
244-250-03  
244-250-04  
244-250-05  
244-250-06  
244-250-07  
244-250-08  
244-260-01  
244-260-02  
244-260-03  
244-260-04  
244-260-05

Los Angeles County  
Assessor Identification Number

San Bernardino County  
Assessor Parcel Numbers

Exhibit A - Assessor Parcel Numbers for Edwards AFB

Kern County  
Assessor Parcel Numbers

244-260-06  
244-270-01  
244-270-02  
244-270-03  
244-270-04  
244-270-05  
244-270-06  
244-270-07  
244-270-08  
248-010-01  
248-010-02  
248-010-03  
248-010-04  
248-010-05  
248-020-01  
248-020-02  
248-020-03  
248-020-04  
248-020-05  
248-030-01  
248-030-02  
248-030-03  
248-030-04  
248-040-01  
248-040-02  
248-040-03  
248-040-04  
248-040-05  
248-040-06  
248-040-07  
248-040-08

Los Angeles County  
Assessor Identification Number

San Bernardino County  
Assessor Parcel Numbers

Exhibit A - Assessor Parcel Numbers for Edwards AFB

Kern County  
Assessor Parcel Numbers

248-040-09  
248-050-01  
248-050-02  
248-050-03  
248-050-04  
248-050-05  
248-050-06  
248-050-07  
248-050-08  
248-060-01  
248-060-02  
248-060-03  
248-060-04  
248-060-05  
248-060-06  
248-070-01  
248-070-02  
248-070-03  
248-070-04  
248-070-05  
248-070-06  
248-070-07  
248-080-01  
248-080-02  
248-080-03  
248-080-04  
248-080-05  
248-080-06  
248-090-01  
248-090-02  
248-090-03

Los Angeles County  
Assessor Identification Number

San Bernardino County  
Assessor Parcel Numbers

Exhibit A - Assessor Parcel Numbers for Edwards AFB

Kern County  
Assessor Parcel Numbers

248-090-04  
248-090-05  
248-090-06  
248-090-07  
248-090-08  
248-100-01  
248-100-02  
248-100-03  
248-100-04  
248-100-05  
248-100-06  
248-100-07  
248-110-01  
248-110-02  
248-110-03  
248-110-04  
248-110-05  
248-110-06  
248-110-07  
248-110-08  
248-110-09  
248-110-10  
248-120-01  
248-120-02  
248-120-03  
248-120-04  
248-120-05  
248-120-06  
248-130-01  
248-130-02  
248-130-03

Los Angeles County  
Assessor Identification Number

San Bernardino County  
Assessor Parcel Numbers

Exhibit A - Assessor Parcel Numbers for Edwards AFB

Kern County  
Assessor Parcel Numbers

248-130-04  
248-130-05  
248-130-06  
248-140-01  
248-140-02  
248-140-03  
248-140-04  
248-140-05  
248-140-06  
248-150-01  
248-150-02  
248-150-03  
248-150-04  
248-150-05  
248-150-06  
248-160-01  
248-160-02  
248-160-03  
248-160-04  
248-160-05  
248-160-06  
248-160-07  
248-160-08  
248-160-09  
248-170-01  
248-170-02  
248-170-03  
248-170-04  
248-170-05  
248-170-06  
248-170-07

Los Angeles County  
Assessor Identification Number

San Bernardino County  
Assessor Parcel Numbers

Exhibit A - Assessor Parcel Numbers for Edwards AFB

Kern County  
Assessor Parcel Numbers

248-170-08  
248-170-09  
248-170-10  
248-180-01  
248-180-02  
248-180-03  
248-180-04  
248-180-05  
248-180-06  
248-190-01  
248-190-02  
248-190-03  
248-190-04  
248-190-05  
248-190-06  
248-200-01  
248-200-02  
248-200-03  
248-200-04  
248-200-05  
248-200-06  
248-210-01  
248-210-02  
248-210-03  
248-210-04  
248-210-05  
248-210-06  
248-220-01  
248-220-02  
248-220-03  
248-220-04

Los Angeles County  
Assessor Identification Number

San Bernardino County  
Assessor Parcel Numbers

Exhibit A - Assessor Parcel Numbers for Edwards AFB

Kern County  
Assessor Parcel Numbers

248-220-05  
248-220-06  
248-220-07  
248-220-08  
248-220-09  
248-230-01  
248-230-02  
248-230-03  
248-230-04  
248-230-05  
248-230-06  
248-230-07  
248-230-08  
248-230-09  
248-230-10  
248-240-01  
248-240-02  
248-240-03  
248-240-04  
248-240-05  
248-240-06  
248-250-01  
248-250-02  
248-250-03  
248-250-04  
248-250-05  
248-250-06  
248-250-07  
248-250-08  
248-260-01  
248-260-02

Los Angeles County  
Assessor Identification Number

San Bernardino County  
Assessor Parcel Numbers



Exhibit A - Assessor Parcel Numbers for Edwards AFB

Kern County  
Assessor Parcel Numbers

248-260-03  
248-260-04  
248-260-05  
248-260-06  
248-270-01  
248-270-02  
248-270-03  
248-270-04  
248-270-05  
248-270-06  
248-270-07  
248-270-08  
430-011-01  
430-011-02  
430-011-03  
430-011-04  
430-011-05  
430-011-06  
431-010-03  
431-010-04  
431-010-05  
431-010-06  
431-010-07  
431-010-08  
471-010-02  
471-010-03  
471-010-04  
471-010-05  
471-010-06  
471-010-08  
471-010-09

Los Angeles County  
Assessor Identification Number

San Bernardino County  
Assessor Parcel Numbers

Exhibit A - Assessor Parcel Numbers for Edwards AFB

Kern County  
Assessor Parcel Numbers

471-010-11  
471-030-02  
471-030-03  
471-030-04  
471-030-05  
471-030-06  
471-030-07  
471-030-08  
471-040-02  
471-040-03  
471-040-04  
471-040-06  
471-040-07  
471-040-08

Los Angeles County  
Assessor Identification Number

San Bernardino County  
Assessor Parcel Numbers

**Exhibit B - Edwards AFB Water Well Locations and Production**

		<b>Groundwater produced (acre-feet)</b>						
		<b>Kern County</b>						
<b>Type of Well</b>	<b>APN for Well</b>	2000	2001	2002	2003	2004	2011	2012 (Nov)
Production	248-180-04	21.21	93.78	308.91	202.62	184.53	9.96	178.49
Production	248-120-03	13.17	9.97	11.31	9.62	32.97	0	0
Production	248-190-03	6.59	5.02	11	52.26	182.92	52.65	6.65
Production	248-120-05	8.37	12.15	20.59	20.26	41.4	72.37	37.5
Production	248-120-02	9.04	6.41	12.79	24.41	4.22	0	73.77
Production	248-200-04	3110.32	2879.4	2260.01	1028.1	2011.58	461.48	389.06
Production	248-200-06	235.58	283.79	254.06	320.89	333.49	119.12	313.31
Production	248-120-01	6.72	4.96	5.17	0	25.66	88.74	41.83
Extraction for remedial system	244-180-02	0	6.95	22.76	15.05	14.23	0	0
Extraction for remedial system	244-180-04	35.92	54.18	34.85	11.08	22.07	0	0
Extraction for remedial system	244-200-03	49.78	40.4	21.22	7.78	1.85	0	0
Extraction for remedial system	248-110-01	6.7	33.81	37.35	24.34	46.96	0	0
Extraction for remedial system	244-080-02	0	4.38	18.33	11.03	8.12	0	0
Extraction for remedial system	244-080-03	1.49	0.53	0.32	0.33	1.46	0	0
		<b>Los Angeles County</b>						
		2000	2001	2002	2003	2004	2011	2012 (Nov)
Production	3310-001-901	299.33	829.17	235.88	318.63	285.85	34.43	21.92
Production	3310-001-900	38.47	12.69	20.15	12.7	16.55	0	0
<b>Total</b>		<b>3842.69</b>	<b>4277.59</b>	<b>3274.7</b>	<b>2059.1</b>	<b>3213.86</b>	<b>838.75</b>	<b>1062.53</b>

Exhibit C - Edwards AFB Surface Water Purchases (acre-feet)

2000	2001	2002	2003	2004	2011	2012 (Nov)
2842.55	2522	2232.55	2875.47	1976.56	1744.76	1687.34

Exhibit D - Edwards AFB Recycled Water Use (acre-feet)

Purpose	2000	2001	2002	2003	2004	2011	2012 (Nov)
Irrigation	955.27	880.53	938.19	880.05	714.7	534.51	142.81
Evaporation ponds	781.1	538.1	332.68	561.85	524.28	129.71	110.16