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10 Attorneys for Granite Construction Company

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

12 **COUNTY OF LOS ANGELES - CENTRAL DISTRICT**

13 ANTELOPE VALLEY GROUNDWATER  
14 CASES

15 **Included Actions:**

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

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

24 Wm. Bolthouse Farms, Inc. v. City of Lancaster,  
25 Diamond Farming Co. v. Lancaster, Diamond  
26 Farming Co. v. Palmdale Water Dist., Superior  
27 Court of California, County of Riverside, Case  
28 No. RIC 353 840, RIC 344 436, RIC 344 668.

Judicial Council Coordination No. 4408

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

**DECLARATION OF STEVEN  
MCCRACKEN IN LIEU OF  
TESTIMONY AT PHASE IV TRIAL**

Phase 4 Trial Date: May 28, 2013

Time: 9:00 a.m.

Dept.: 1

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**DECLARATION**

I, STEVE MCCRACKEN, declare:

1. I am employed by Granite Construction Company (Granite) as the Manager of Construction Materials for Granite's Southern California and Central California Regions.

Attached as **Exhibit A** is a statement of my professional qualifications. If called as a witness, I could and would competently testify to the facts set forth herein from my personal knowledge.

2. My duties include overseeing operations at Granite's Littlerock Quarry in the Littlerock Area of Antelope Valley.

3. There are three groundwater wells located at the Littlerock Quarry. Groundwater is used on site to control dust and to wash and process rock, sand and gravel. Pump #1 is rated at 40 HP, 325 gallon per minute. Pump #2 is rated at 20 HP, 105 gallons per minute. Pump #3 is rated at 30 HP, 230 gallons per minute.

4. The wells do not have flow meters or isolated electrical panels. Accordingly, I have estimated Granite's groundwater use at the Littlerock Creek Quarry as a function of water consumed during production, water used for dust control, pond evaporation, pond infiltration and system leakage. Granite's production output for years 2000 through 2012 is confidential and can be provided upon request to counsel who have executed the protective order. My conclusion of water production at the Littlerock Quarry for years 2011 and 2012 is as follows:

<u>Year</u>	<u>Water (AF)</u>
<b>2011</b>	<b>417.8</b>
<b>2012</b>	<b>423.3</b>

5. My conclusions are based on several factors. First, I estimated that produced sand contains 20% water by weight and that produced aggregates contain .5% water by weight.

1 Groundwater used in the processing of rock is pumped from the three wells into two ponds with a  
2 combined surface area of approximately 4.5 acres. I estimated evaporative losses from the pond of  
3 83.7 (sic) inches per year or 31.28 acre feet per year based on average pan evaporation data for the  
4 Bakersfield AP obtained from the California Climate Data Archive. I estimated pond  
5 infiltration/seepage of two inches per day or 270 acre feet per year based upon hydraulic  
6 conductivity values for "clayey sand" of three inches per day obtained from Table 5-56 the  
7 Geotechnical Aspects of Pavement Reference Manual, a copy of which is attached as **Exhibit B**. I  
8 then adjusted the hydraulic conductivity downward conservatively to two inches per day. I  
9 assumed plant leakage and loss of 5% of clean water input. Granite operates water trucks on site  
10 to control dust. The water trucks hold 4,500 gallons of water, operate on average 275 days per  
11 year, 9 hours a day and are typically required to be refilled three times per hour. Thus, I calculated  
12 27 truck loads per day or 103 acre feet per year at the Littlerock Quarry for dust control.

15 6. As an alternate means of estimating groundwater production, I calculated the  
16 theoretical daily capacity of Pump # 1 and Pump #2. Pump # 3 is generally reserved for double-  
17 shifting during periods of high production. I conservatively assumed that Pump #3 was not  
18 operated. Pump # 1 is operated on average 236 days per year, 24 hours per day. Pump #2 is  
19 operated on average 275 days per year, 24 hours per day. I calculated the output of Pumps # 1 and  
20 #2, based on Granite's average days of operation and conservatively assumed no production from  
21 Pump #3 and arrived at an estimated 471 acre-Feet of production. A table summarizing my  
22 computation is shown below.  
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EXHIBIT						
GRANITE LITTLEROCK QUARRY PUMPING CAPACITY						
Desc.	Location	HP	GPM	Est. Days Per Year	Est. Hrs Per Day	Estimated AC*Ft/Yr
Pump 1	Plant	40	325	236	24	342
Pump 2	Office	20	105	275	24	129
Pump 3	SE	30	320	0	0	0
TOTAL ANNUAL PUMPING						471


7. Granite also owns in fee 145 acres of land in the Big Rock Area of Antelope Valley on which Big Rock Creek Quarry is located. The Big Rock Creek Quarry is permitted, but not currently operational. Granite produces groundwater from one well at the Big Rock Quarry to maintain its landscaping consisting of a 30-foot wide strip of oleanders, junipers and other vegetation around the perimeter of the property. Granite applied approximately 16 acre feet per year in 2011 and 2012 for landscape maintenance.

8. Granite's total groundwater production in the AVAA for 2011 and 2012 is estimated as follows:

- a. 2011 - 433.8 acre feet
- b. 2012 - 439.3 acre feet

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

Executed this 29 day of May, 2013, at Indio, California.

  
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Steve McCracken