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6 Attorneys for Granite Construction Company

7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
8 **COUNTY OF LOS ANGELES - CENTRAL DISTRICT**

9 **ANTELOPE VALLEY GROUNDWATER**  
10 **CASES**

11 **INCLUDED ACTIONS:**

12 Los Angeles County Waterworks District No. 40  
v. Diamond Farming Co., Superior Court of  
California, County of Los Angeles, Case No. BC  
13 325201;

14 Los Angeles County Waterworks District No. 40  
v. Diamond Farming Co., Superior Court of  
California, County of Kern, Case No. S-1500-CV-  
15 254348;

16 Wm. Bolthouse Farms, Inc. v. City of Lancaster,  
17 Diamond Farming Co. v. Lancaster, Diamond  
Farming Co. v. Palmdale Water Dist., Superior  
18 Court of California, County of Riverside, Case  
No. RIC 353840, RIC 344436, RIC 344668

19 Rebecca Lee Willis v. Los Angeles County  
20 Waterworks District No. 40  
Superior Court of California, County of Los  
21 Angeles, Case No. BC 364553

22 Wood v. A.V. Materials, Inc., et al., Superior  
23 Court of California, County of Los Angeles, Case  
No. BC 509546

24 Little Rock Sand and Gravel, Inc. v. Granite  
25 Construction Co., Superior Court of California,  
26 County of Los Angeles, North Judicial District,  
Case No. MC026932  
27

**Judicial Council Coordination No. 4408**

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

**SUPPLEMENTAL DECLARATION**  
**OF WILLIAM TAYLOR IN**  
**SUPPORT OF MOTION BY**  
**GRANITE CONSTRUCTION**  
**COMPANY TO INTERPRET AND**  
**ENFORCE THE JUDGMENT AND**  
**TO PARTITION THE EXHIBIT 4**  
**“Granite Construction Company**  
**(Little Rock Sand and Gravel, Inc.)”**  
**PRODUCTION RIGHT**

Date: June 20, 2018

Time: 9:00 a.m.

Dept. 222

1 I, WILLIAM TAYLOR, declare as follows:

2 1. I am employed by Granite Construction Company (“Granite”) as the Resource  
3 Development Manager for the Central California Region. I have been employed by Granite since  
4 2008.

5 2. I am over the age of eighteen and if I were called as a witness, I would and could  
6 testify to the facts set forth herein.

7 3. I previously submitted a Declaration of William Taylor in Opposition to Lane  
8 Family’s Motion for Post Judgment Supplemental Order Re Granite Construction Company filed  
9 with the Court on March 8, 2016, as Doc # 11262. This declaration supplements my previous  
10 declaration.

11 4. I am one of the managers in charge of managing Granite’s facilities, operations  
12 and related permits for the Central California Region, which includes the Antelope Valley Area  
13 of the Adjudication (AVAA). Since Granite first appeared in 2012, I have participated in and  
14 assisted counsel in protecting Granite’s groundwater rights in Judicial Council Coordination No.  
15 4408, the Antelope Valley Groundwater Cases. I attended numerous mediation sessions before  
16 Justice Ronald Robie and also worked with our counsel in reaching the global settlement on  
17 allocation in March, 2014.

18 5. I am familiar with the operation and permitting of Granite’s Littlerock Quarry and  
19 permitting of Granite’s Big Rock Quarry. Granite is actively mining its own property adjacent to  
20 the property it leases from LS&G. When the aggregate deposits near depletion on Granite’s  
21 adjacent property, Granite will phase-out commercial operations at its Littlerock Quarry and  
22 phase-in operations at its Big Rock Quarry which will include an aggregate extraction and  
23 processing facility, asphalt batch plant and concrete ready-mix plant on site. Condition 8c of  
24 Granite’s surface mining permit requires that Granite phase out production at the Littlerock  
25 Quarry as it phases in production at the Big Rock Quarry. The condition states:

26 “The permittees existing Palmdale Plant shall be phased out as  
27 production at the subject facility is phased in. The combined  
28

1 production rates at the old and new plants shall not exceed 4,000  
2 tons per day while both plants are in production.”

3 6. The Big Rock Quarry consists of about 145 acres of land owned by Granite in fee.  
4 Water demand varies greatly with production volumes. Granite was only allocated a Production  
5 Right of 126 AF for its Big Rock Quarry and plans to make up the shortfall by transferring its  
6 Littlerock Quarry Production Right to Big Rock.

7 7. Water is critical to Granite’s mining operations for dust control, washing and  
8 processing aggregates, landscape irrigation and domestic use. If Granite was awarded less than  
9 50% of the Littlerock Quarry Production Right, Granite would be forced to buy additional water  
10 supplies, driving up its costs of production and putting Granite at a competitive disadvantage  
11 with its competitors in the AVAA, including Vulcan Materials and Robar Enterprises and Hi-  
12 Grade Materials.

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

15 Executed this 14 day of April, 2018, at Santa Barbara, California.

16 

17 \_\_\_\_\_  
18 William Taylor