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EXEMPT FROM FILING FEES
[Gov. Code, § 6103]

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 COUNTY OF LOS ANGELES

11
12 **Coordination Proceeding**
13 **Special Title (Rule 3.550(c))**

14 **ANTELOPE VALLEY GROUNDWATER**
15 **CASES**

16 **Included Actions:**

17 **Los Angeles County Waterworks District**
No. 40 v. Diamond Farming Co.
18 **Superior Court of California County of Los**
Angeles, Case No. BC 325 201

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

21 **Wm. Bolthouse Farms, Inc. v. City of**
Lancaster, Diamond Farming Co. v. City of
22 **Lancaster, Diamond Farming Co. v.**
23 **Palmdale Water Dist. Superior Court of**
California, County of Riverside,
24 **consolidated Actions, Case Nos. RIC 353**
840, RIC 344 436, RIC 344 668

25 **AND RELATED ACTIONS.**
26
27
28

Judicial Council Coordination
Proceeding No. 4408

Santa Clara Case No. 1-05-CV-049053

SUPPLEMENTAL DECLARATION OF
JEROME R. MARCOTTE P.E. ON
BEHALF OF STATE OF CALIFORNIA,
DEPARTMENT OF TRANSPORTATION
PURSUANT TO CASE MANAGEMENT
ORDER FOR PHASE IV TRIAL

[Assigned for All Purposes to the Honorable
Jack Komar]

Trial Date: May 28, 2013
Time: 1:00 p.m. .
Dept: 322

Action Filed: October 26, 2005

1 I, JEROME R. MARCOTTE P.E. declare as follows:

2 1. I am a Senior Sanitary Engineer for the California Department of Transportation
3 (Caltrans), an agency of the State of California, one of the parties hereto. I have a Bachelor of
4 Science degree in Civil Engineering from Worcester Polytechnic Institute in 1978. I am
5 employed in the Office of Electrical, Mechanical, Water and Wastewater Engineering of the
6 Division of Engineering Services of Caltrans. I have been employed in that position since July
7 2005. Prior to that position, I held the position of Senior Transportation Engineer with Caltrans
8 from March 2000 through June, 2005. I am authorized to make this declaration for and on behalf
9 of Caltrans. If called as a witness, I could and would competently testify to the information set
10 forth in this declaration.

11 2. On January 31, 2013, my declaration was filed with this Court. (Marcotte
12 Declaration). In addition, I have reviewed the State of California Stipulation of Facts For Phase
13 IV Trial filed on May 24, 2013.

14 3. To clarify my Declaration and to specifically highlight the information sought by
15 the Court on the groundwater pumping figures for the years of 2011 and 2012 in the amount of
16 15.47 acre-feet in 2011 and 15.64 acre-feet in the year of 2012 for the State of California,
17 Department of Transportation, I provide a further explanation as follows:

18 4. In my Declaration at paragraph 7, I explained my calculations and estimated the
19 water usage for toilets, urinals, sinks, and drinking fountains for 2012 at the Boron SRRAs
20 (Eastbound and Westbound) from two active wells as 7.03 acre-feet. In paragraph 8, I explained
21 my calculations and estimated the water use for landscaping at the Boron SRRAs to be
22 approximately 8 acre-feet per year. Together, the total groundwater pumped from the two wells
23 at the Boron SRRAs for 2012 was 15.03 acre-feet.

24 5. In my Declaration at paragraph 12, I explained my calculations and estimated
25 water use at the Claymine Road Overcrossing for roadway and roadside maintenance activities
26 and fire and dust suppression as .61 acre feet in 2012.
27
28


6. Together, the total groundwater pumped at three wells for the Boron SRRAs and the Claymine Road Overcrossing is 15.64 acre-feet in 2012.

7. Utilizing the same calculations, I prepared similar water usage figures for the State of California Stipulation of Facts filed on May 24, 2013. In paragraph 46 of that Stipulation, I calculated water usage for toilets, urinals, sinks and drinking fountains at the Boron SRRAs for 2011 to be 6.86 acre-feet and 8 acre-feet for landscaping. I calculated a total of 14.86 acre-feet for the Boron SRRAs two wells in 2011. In paragraph 47 of that Stipulation, I calculated the total for both the Boron SRRAs and the Claymine Overcrossing to be 15.47 acre-feet in 2011. Therefore, the estimate for the Claymine Road Overcrossing was .61. acre-feet for 2011.

8. The exhibits attached to my Declaration support the groundwater pumping estimates for 2011 and 2012 and they are all correct.

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

Executed on May 29, 2013, in Sacramento, California.

By: 
JEROME MARCOTTE
Senior Sanitary Engineer
California Department of Transportation

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CERTIFICATE OF SERVICE

Case Name: **Antelope Valley Groundwater
Cases**

No. **JCCP 4408**

I hereby certify that on May 29, 2013, I electronically served the following document(s)

**SUPPLEMENTAL DECLARATION OF JEROME R. MARCOTTE P.E. ON BEHALF
OF STATE OF CALIFORNIA, DEPARTMENT OF TRANSPORTATION PURSUANT
TO CASE MANAGEMENT ORDER FOR PHASE IV TRIAL**

on the interested parties in this action, by posting the document(s) listed above to the Santa Clara County Superior Court e-filing website (<http://www.scefiling.org>) under the Antelope Valley Groundwater matter pursuant to the Court's Order dated October 27, 2005.

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on May 29, 2013, at Los Angeles, California.

Blanca Cabrera
Declarant


Signature