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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA

)
) Santa Clara
 ANTELOPE VALLEY GROUNDWATER CASES,) Case No.
) 1-05-CV-049053
) VOLUME VII

TRIAL TESTIMONY OF JOSEPH SCALMANINI
WEDNESDAY, JANUARY 19, 2011

REPORTED BY:
TOM FRASIK, RPR, CSR 6961

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1 A. Yes.

2 You didn't describe effective precipitation
3 quite right, but it's close enough for this discussion,
4 I think.

5 Q. Okay. And then you divided by some number, 11:28:12
6 and in your case that was called distribution
7 uniformity, and the end result was your crop water
8 requirement; is that correct?

9 A. Applied water requirement, yes.

10 Q. So if you could turn to Exhibit 52? 11:28:27

11 We started out the description of your method
12 that you multiplied your referenced evapotranspiration
13 by your crop coefficients, and on Exhibit 52 does this
14 exhibit show both your referenced evapotranspiration and
15 your crop coefficients? 11:29:01

16 A. It shows the ones we used, yes.

17 Q. And where did you get your crop coefficient
18 numbers?

19 A. From University of California Cooperative
20 Extension, a table that's included as Exhibit 56. 11:29:18

21 Q. And where the table that's marked Exhibit 56?

22 A. I don't remember exactly where it got it in the
23 first place, but -- well, that's the best answer.

24 Q. Well, it's a table to something and, again,
25 my copy is illegible so I can't see. I think it says 11:29:40

1 Table 2?

2 A. Yes.

3 Q. So it Table 2 to something. What is it Table 2
4 to?

5 MR. WEEKS: Objection; calls for speculation. 11:29:51

6 THE WITNESS: Well, we made some effort to try
7 to find that out. Ultimately contacted -- if you look
8 at the -- give me a second. Yeah, the bottommost line
9 on the figure says "Modified by G.J. Poole, LA County
10 Forum Advisor, 2004." 11:30:30

11 And so we contacted him last year to try to
12 gain some clarification of what this was part of. And
13 he communicated that regardless of the Table 2 number,
14 because it was logical to me as well, that this was part
15 of a paper or something to that effect, but he said it 11:30:42
16 wasn't, that it was prepared independently to provide
17 this kind of information available to those who would
18 want to use it for the California High Desert. So it's
19 a stand-alone table even though it says Table 2.

20 BY MR. FIFE: 11:30:59

21 Q. So this isn't part of a publication of any
22 kind?

23 A. As far as I know, it's not. That's what he
24 said.

25 Q. And since you called him to get it, you didn't 11:31:05

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1 get this table from him?

2 A. No, no. No, we didn't get it from him, no.

3 We'd had it for some time. We'd made attempts to

4 contact him in years earlier, but he'd not responded.

5 Q. And it had to come from somewhere. It's not in 11:31:21

6 a publication. You didn't get it from Poole. It didn't

7 just appear. Where --

8 A. I told you I don't remember.

9 MR. DUNN: Objection; argumentative, compound.

10 BY MR. FIFE: 11:31:37

11 Q. So you have no idea where this table came from?

12 A. How I got it in the first place?

13 Q. Yes.

14 A. I don't remember.

15 Q. So, now, according to your methodology, as we 11:31:51

16 described from Exhibit 52, you multiplied the crop

17 coefficients by the referenced evapotranspiration and

18 that gave you the evapotranspiration of crops as

19 expressed in Exhibit 53; is that correct?

20 A. Yes. 11:32:12

21 Q. Now, if we turn to Exhibit 56, 56 also has a

22 set of numbers for evapotranspiration of crops; is that

23 correct?

24 This would be the second set of numbers labeled

25 Crop Water Use Estimates, and then in parenthesis it 11:32:58

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