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**LOS ANGELES COUNTY WATERWORKS**  
**DISTRICT NO. 40**

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

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**COUNTY WATERWORKS DISTRICT NO. 40**

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES**

**ANTELOPE VALLEY  
GROUNDWATER CASES**

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

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

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

Judicial Council Coordination No. 4408

**CLASS ACTION**

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

**DECLARATION OF ROBERT  
GORRINDO IN LIEU OF DEPOSITION  
TESTIMONY FOR PHASE 4 TRIAL**

## **DECLARATION**

I, Robert Gorrindo, declare:

1. I am Robert Gorrindo for Gorrindo Family Trust/Gorrindo Resourceful, LLC, a party to this action. In lieu of deposition testimony for the Phase 4 trial, I am providing this declaration. This declaration applies only to the categories I have filled in. The items left blank or crossed out do not apply to me. I have personal knowledge of each fact herein and would testify competently thereto under oath.

### **Property Ownership and Parcel Size**

2. Gorrindo Family Trust/Gorrindo Resourceful, LLC owns property that overlies the Antelope Valley Area of Adjudication as decided by this Court. The land is in Los Angeles County and is identified by the following APN/APNs:

3278-003-001

[If additional room is needed, please identify the APN/APNs in Exhibit A.] A true and correct copy of Exhibit A is attached hereto and incorporated herein.

3. Gorrindo Family Trust/Gorrindo Resourceful, LLC claims groundwater rights only as to the properties listed in Paragraph 2 and Exhibit A.

4. For each APN/APNs identified above, the total acreage by parcel is as follows:

3278-003-001 — 640 Acres

[If additional room is needed, please identify the APN/APNs and parcel size in Exhibit B.] A true and correct copy of Exhibit B is attached hereto and incorporated herein.

5. For each APN/APNs identified above Gorrindo Family Trust/Gorrindo Resourceful, LLC owned the property during the following timer period: 1940 to present.

6. The following are all individuals/entities appearing on the title for the above identified APN/APNS from Jan 1, 2000 to the present: Gorrindo Family Trust/Gorrindo Resourceful, LLC.

7. For each individual/entity identified in paragraph 6 that individual/entity appeared on the title during the following time :

Gorrindo Family Trust until December 2009 when Maria Gorrindo died. After death, the

property passed to son, daughter, grandchildren, as in part of Gorrindo Resourceful, LLC.

**Leases**

8. John Calandri (declarant or party affiliated with declarant) leases property that Gorrindo Family Trust/Gorrindo Resourceful, LLC own and that overlies the Antelope Valley Area of Adjudication as decided by this court and identified by the following APNS: 3278-003-001.

9. The total acreage by parcel is: 640.

10. The property is currently leased to: John Calandri.

11. The property was leased on the following dates:

John Calandri: 1974 to 1982

Clyde Larson: 1985 to 1989

John Calandri: 2003 to 2008, 2011, 2013.

12. The lease provides that Gorrindo Family Trust/Gorrindo Resourceful, LLC may claim groundwater rights from the use of water on the leased property. Attached to this declaration is a true and correct copy of the lease. See attachment from John Calandri.

[If additional room is needed, please list APN/APNs, acreage by APN, Lessee by APN and dates for each Lessee by APN for each parcel in Exhibit C.] A true and correct copy of Exhibit C is attached hereto and incorporated herein.

13. \_\_\_\_\_ leases property from \_\_\_\_\_ which overlies the Antelope Valley Area of Adjudication as decided by this court and is identified by the following APNS:

\_\_\_\_\_.

14. The total acreage by parcel is:

\_\_\_\_\_.

.

15. The Lease provides that \_\_\_\_\_ may claim groundwater rights from use of water on leased property. Attached to this declaration is a true and correct copy of the lease.

[If additional room is needed, please attach APN/APNs, Name of the Lessor and acreage by APN for each parcel list in Exhibit D to this declaration.] A true and correct copy of Exhibit D is attached hereto and incorporated herein.

16. \_\_\_\_\_ claims groundwater rights only as to the leasehold interests listed in Paragraph 15 and Exhibit D.

17. \_\_\_\_\_ claims groundwater rights only as to the properties listed in Paragraph 2 and Exhibit A and as to the leasehold interests listed in Paragraph 8 and Exhibit C.

18. To the best of my knowledge, only \_\_\_\_\_ claims groundwater rights as to the leased parcel(s) identified in paragraph 15 and Exhibit D.

#### **Water Meter Records**

19. \_\_\_\_\_ measures the groundwater production on the above referenced properties by water meters. Exhibit E contains the records for these water meters for the following years:

\_\_\_\_\_.

A true and correct copy of Exhibit E is attached hereto and incorporated herein.

20. Exhibit F sets forth the total yearly production amounts by metered water well on the above referenced properties for the years 2000-2004, 2011, and 2012. A true and correct copy of Exhibit F is attached hereto and incorporated herein.

#### **State Water Project Purchases**

21. \_\_\_\_\_ purchases State Water Project water from a State Water Contractor for use by \_\_\_\_\_ on the properties referenced above. Exhibit G contains true and correct copies of the invoices for delivery of State Water Project Water to the properties referenced above.

22. Exhibit H sets forth the total yearly State Water Project water deliveries to the properties referenced above for the years 2000-2004, 2011, and 2012. A true and correct copy of Exhibit H is attached hereto and incorporated herein.

**Pump Tests/ Electric Records**

23. In order to calculate groundwater pumped and used on the properties referenced above, \_\_\_\_\_ relied on pump tests and electric records. Exhibit I contains true and correct copies of the pump test records and electrical records for wells on the properties referenced above. The electric records attached to this declaration as Exhibit I do not include electric use on the properties referenced above for anything other than pumping groundwater.

24. Exhibit J sets forth the amount of total yearly groundwater that \_\_\_\_\_ estimates was pumped and used on the properties referenced above for the years 2000-2004, 2011, and 2012 based on the attached pump test records and electrical records for the wells on the properties referenced above. A true and correct copy of Exhibit J is attached hereto and incorporated herein.

25. Pump tests were performed on the following dates: when wells were developed.

26. \_\_\_\_\_ is not producing pump test records for the following dates \_\_\_\_\_ because: \_\_\_\_\_.

27. I am not aware of any other pump tests having been performed on the properties referenced above.

**Pump Tests/Diesel Records**

28. In order to calculate groundwater pumped and used on the properties referenced above, \_\_\_\_\_ relied on pump tests and diesel fuel records. Exhibit K contains true and correct copies of the records pertaining to pump tests and diesel fuel purchases for the properties referenced above. The diesel fuel records attached to this declaration as Exhibit K do

not include diesel fuel used on the properties referenced above for anything other than pumping groundwater.

29. Exhibit L sets forth the amounts of total yearly groundwater pumped and used on the properties referenced above for the years 2000-2004, 2011, and 2012. A true and correct copy of Exhibit L is attached hereto and incorporated herein.

30. Pump tests were performed on the following dates:

\_\_\_\_\_.

31. \_\_\_\_\_ is not producing pump test records for the following dates \_\_\_\_\_ because:

\_\_\_\_\_.

32. I am not aware of any other pump tests having been performed on the properties referenced above.

#### **Crop Duties and Irrigated Acres**

33. In order to calculate water use on the properties referenced above, Gorrindo Family Trust/Gorrindo Resourceful, LLC relies on the amount of acres in irrigation on the properties referenced above multiplied by the crop duty identified in the Summary Expert Report, Appendix D-3: Table 4, a true and correct copy of which is attached to this declaration as Exhibit M.

34. The total amount of irrigated acres and type of crops on the properties referenced above by APN for the years 2000-2004, 2011 and 2012 are described in Exhibit N. A true and correct copy of Exhibit N is attached hereto and incorporated herein.

#### **Other Sources of Water**

35. On the properties referenced above, \_\_\_\_\_ received water from sources other than groundwater pumped within the Basin or State Water Project Water. Exhibit O sets forth the source of the water and the amounts received for the years 2000-2004, 2011, and 2012.

**Use of Water** (*Complete for each APN. If water for used for multiple purposes, identify the amount of water for each use.*)

36. I used 0 acre feet of water on APN# 3278-003-001 in 2000. The water was used for the following: \_\_\_\_\_.

[State the crop type and number of acres of that crop. If not used for irrigation, describe the use.

In lieu of answering this question, a crop map may be attached that shows the date, crop type, irrigated acreage and parcels.]

37. I used 0 acre feet of water on APN# 3278-003-001 in 2001. The water was used for the following: \_\_\_\_\_.

[State the crop type and number of acres of that crop. If not used for irrigation, describe the use.

In lieu of answering this question, a crop map may be attached that shows the date, crop type, irrigated acreage and parcels.]

38. I used 0 acre feet of water on APN# 3278-003-001 in 2002. The water was used for the following: \_\_\_\_\_.

39. Gorrindo Family Trust/Gorrindo Resourceful, LLC used 1456 acre feet of water on APN# 3278-003-001 in 2003. The water was used for the following: Carrots on 320 acres\_\_\_\_\_.

[State the crop type and number of acres of that crop. If not used for irrigation, describe the use.

In lieu of answering this question, a crop map may be attached that shows the date, crop type, irrigated acreage and parcels.]

40. Gorrindo Family Trust/Gorrindo Resourceful, LLC used 1456 acre feet of water on APN# 3278-003-001 in 2004. The water was used for the following: Carrots on 320 acres\_\_\_\_\_.

[State the crop type and number of acres of that crop. If not used for irrigation, describe the use.

In lieu of answering this question, a crop map may be attached that shows the date, crop type, irrigated acreage and parcels.]

41. Gorrindo Family Trust/Gorrindo Resourceful, LLC used 728 acre feet of water on APN# 3278-003-001 in 2011. The water was used for the following: Carrots on 160 acres\_\_\_\_\_.

[State the crop type and number of acres of that crop. If not used for irrigation, describe the use. In lieu of answering this question, a crop map may be attached that shows the date, crop type, irrigated acreage and parcels.]

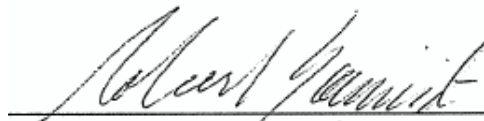
42. \_\_\_\_\_ used \_\_\_\_\_ acre feet of water on APN# \_\_\_\_\_ in 2012. The water was used for the following:

\_\_\_\_\_.

[State the crop type and number of acres of that crop. If not used for irrigation, describe the use. In lieu of answering this question, a crop map may be attached that shows the date, crop type, irrigated acreage and parcels.]

43. Other than what is declared hereinabove, Gorrindo Family Trust/Gorrindo Resourceful, LLC did not produce or use water within the Antelope Valley Area of Adjudication for 2000-2004, 2011, and 2012.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 24th day of January 2013, at Lancaster, California.



\_\_\_\_\_

**EXHIBIT “A”**

## EXHIBIT "B"

[illegible]






EXHIBIT “E”

## EXHIBIT "F"

[illegible]


EXHIBIT “G”

EXHIBIT “H”

EXHIBIT “T”

EXHIBIT “J”

EXHIBIT “K”

EXHIBIT “L”

EXHIBIT “M”

**Appendix D-3: Table 4**  
**Applied Crop Water Duties and Irrigation Efficiency Values**  
(DU = 80%)  
**Antelope Valley Area of Adjudication**

Crop	ET <sub>c</sub> <sup>1</sup> (in)	P <sub>e</sub> <sup>2</sup> (in)	ET <sub>AW</sub> <sup>3</sup> (in)	DU <sup>4</sup> (%)	AW <sub>c</sub> <sup>5</sup> (in)	AW <sub>er</sub> <sup>6</sup> (in)	AW <sub>pr</sub> <sup>7</sup> (in)	AW <sub>T</sub> <sup>8</sup> (in)	(ft)	E <sub>irr</sub> <sup>9</sup> (%)
Alfalfa	62.10	1.77	60.33	80	75.42	0	2.0	77.42	6.5	81
Carrots	27.47	0.00	27.47	80	34.33	6	6.5	46.83	3.9	85
Grain	22.94	1.42	21.52	80	26.90	0	4.0	30.90	2.6	83
Melons/Squash	23.91	0.00	23.91	80	29.88	0	4.0	33.88	2.8	82
Onions	37.57	0.00	37.57	80	46.96	3	4.0	53.96	4.5	83
Orchard (Deciduous)	47.38	0.00	47.38	80	59.22	0	0.0	59.22	4.9	80
Pasture	66.19	1.77	64.42	80	80.53	0	0.0	80.53	6.7	80
Potatoes	24.02	0.00	24.02	80	30.03	0	4.0	34.03	2.8	82
Silage	27.31	0.00	27.31	80	34.14	0	4.0	38.14	3.2	82
Sugar Beets	40.55	0.00	40.55	80	50.68	0	4.0	54.68	4.6	81
Vineyard (Grapes)	35.33	0.00	35.33	80	44.16	0	0.0	44.16	3.7	80

<sup>1</sup> ET<sub>c</sub> = K<sub>c</sub> \* ET<sub>o</sub>, where ET<sub>o</sub> = average ET<sub>o</sub> for specified periods, based on data from Victorville CIMIS Station, 1994-2003); K<sub>c</sub> values from Univ. California Cooperative Extension

<sup>2</sup> P<sub>e</sub> = effective precipitation offsetting ET<sub>c</sub>, up to 1/2 of the average precipitation, in Dec. - Feb., inclusive

<sup>3</sup> ET<sub>AW</sub> = evapotranspiration of applied water = ET<sub>c</sub> - P<sub>e</sub>

<sup>4</sup> DU = irrigation distribution uniformity

<sup>5</sup> AW<sub>c</sub> = applied water for crop requirement = ET<sub>AW</sub> \* DU

<sup>6</sup> AW<sub>er</sub> = applied water for erosion control

<sup>7</sup> AW<sub>pr</sub> = applied water for field preparation and pre-irrigation

<sup>8</sup> AW<sub>T</sub> = applied crop water duty = AW<sub>c</sub> + AW<sub>er</sub> + AW<sub>pr</sub>

<sup>9</sup> E<sub>irr</sub> = overall irrigation efficiency for beneficial uses = (ET<sub>AW</sub> + AW<sub>er</sub> + AW<sub>pr</sub>) / AW<sub>T</sub>

EXHIBIT "N"



EXHIBIT "O"