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Exempt from Filing Fees  
Government Code § 6103

6 Attorneys for  
7 Antelope Valley Watermaster

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

10  
11 Coordination Proceeding,  
Special Title (Rule 1550(b))

Judicial Council Coordination  
Proceeding No. 4408

12 LASC Case No.: BC 325201

13 **ANTELOPE VALLEY**  
14 **GROUNDWATER CASES**

Santa Clara Court Case No. 1-05-CV-049053  
Assigned to the Hon. Jack Komar, Judge of  
the Santa Clara Superior Court

15 **DECLARATION OF PHYLLIS STANIN**  
16 **IN SUPPORT OF WATERMASTER'S**  
17 **OPPOSITION TO THE PEOPLE**  
18 **CONCERN, INC'S MOTION FOR**  
19 **ACTION AND IMPLEMENTATION**

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21 

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AND ALL RELATED ACTIONS

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Date: August 24, 2023  
Time: 2:00 p.m.  
Dept: Courtcall

22 I, PHYLLIS STANIN, declare and state as follows:

23 1. I make this declaration in support of the Antelope Valley Watermaster's Opposition  
24 to the Motion for Action and Implementation filed by The People Concern, Inc. as agent for Barrel  
25 Springs Properties, LLC (the "Opposition"). All capitalized terms not defined herein have the same  
26 definitions as set forth in the Opposition.

27 2. I am the Vice President and Principal Geologist at Todd Groundwater, the  
28 Watermaster Engineer. I have personal knowledge of the facts stated herein and, if called upon to  
do so, I could testify to these facts.

3. I prepared the Findings and am familiar with the facts and data relied upon by the Watermaster Engineer in reviewing Barrel Springs' Application.

4. Although the Watermaster Engineer asked for additional information on the specific water demands for each component of the Project, the Watermaster Engineer did not independently verify the proposed domestic uses and future Project demands beyond what was presented in the Application. The Watermaster Engineer also assumed that stringent conservation measures would be incorporated into the Project as represented in the Application. Although the Watermaster Board expressed concerns over the proposed water uses, Barrel Springs has not provided additional assurances of the reasonableness of the water use estimates and the conservation measures.

5. The Watermaster Engineer asked Barrel Springs on several occasions for additional information regarding the existing wells in the vicinity of the Project and shown on the Application. The lack of data for these nearby wells is the reason the findings include the caveat that “future impacts to existing wells cannot be ruled out.” The Findings could be enhanced if Barrel Springs were to provide this additional data, which has not been provided to date.

6. The Watermaster Engineer remains concerned about the lack of hydrogeologic data for the area of the Basin surrounding the Project. A test well to establish aquifer parameters would help clarify potential impacts on local wells and assess whether a well in the proposed location can support a water use of 120 acre-feet per year.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration is executed on August 9, 2023, at Lafayette, California.

Phyllis A. Stanim

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PHYLLIS STANIN

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA, COUNTY OF SANTA BARBARA

3 I am employed in the County of Santa Barbara, State of California. I am over the age of  
4 eighteen (18) and not a party to the within action. My business address is 200 East Carrillo Street,  
Fourth Floor, Santa Barbara, California 93101.


5 On August 10, 2023, I served the foregoing document described **DECLARATION OF**  
6 **PHYLLIS STANIN IN SUPPORT OF WATERMASTER'S OPPOSITION TO THE**  
7 **PEOPLE CONCERN, INC'S MOTION FOR ACTION AND IMPLEMENTATION** on all  
interested parties in this action by placing the original and/or true copy.

8 ☒ **BY ELECTRONIC SERVICE:** I posted the document(s) listed above to the Santa Clara  
9 County Superior Court Website @ [www.scefilng.org](http://www.scefilng.org) and Glotrans website in the action of  
the Antelope Valley Groundwater Cases.

10 ☒ (*STATE*) I declare under penalty of perjury under the laws of the State of California that  
11 the foregoing is true and correct.

12 ☐ (*FEDERAL*) I hereby certify that I am employed in the office of a member of the Bar of  
this Court at whose direction the service was made.

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14 Executed on August 10, 2023, at Santa Barbara, California.

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16 \_\_\_\_\_  
17 Signature  
18 Elizabeth Wright  
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